## ENVIRONMAENTAL MANAGEMENT PLAN FOR MINERAL EXPLORATION ACTIVITIES ON EPL 8375 IN THE SKELETON COAST, KUNENE REGION.



# MAY 2022 PREPARED FOR GRAVITY MINING CC PREPARED BY:

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#### . Environmental management plan

#### 6.1 Overview

Conducting an environmental assessment prior to engaging in an activity such as mining or exploration is one means of anticipating future environmental repercussions and creating ways to avoid or minimize them. Prior to prospecting or mining a specific location, it is usual practice to have an environmental management plan in place. It's crucial to have a well-structured, all-encompassing plan in place, as well as an environmental management system put up by a certified environmental consultant to assist management in making responsible and realistic decisions. Each on-site employee should be given a simplified explanation of the EMP's needs at the start of exploratory activities. Employees must be informed that they are required to follow this plan when this paper is issued.

#### 6.2 Environmental management principles

Everyone will be expected to conduct all of their activities in an environmentally and socially responsible manner. This includes all consultants, contractors, and subcontractors, as well as transport drivers, visitors, and anybody else involved in the mineral exploration project who enters the exploration regions. Protect project staff and the general public's health and safety from the project's potential consequences. This covers road safety, on-site protection from natural risks, and radiation concerns. Environmental resource management and conservation that takes into account the needs of current and future generations Prevent contamination of the air, water, and soil, and conserve biodiversity.

#### 6.3 Impacts on the bio-physical environment

Table 1 Possible effects on the bio-physical environment, mitigation measures, and their monitoring methods

Impacts	Mitigation measures Monitoring methods
Impacts on	- Buffer zones will be created An archaeologist will inspect any
Archaeological	around the sites. identified archaeological sites
Sites	- Adhere to practical before commencing with the
	guidelines provided by an mineral exploration activities.
	archaeologist to reduce the
	archaeological impact of
	mineral exploration
	activities.

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	- All archaeological sites to be
	identified and protected
	before further exploration
	commences.
	- Notices/information boards
	will be placed on sites.
	- Training employees
	regarding the protection of
	these sites.
Impacts on	- Some habitat areas such as Regular monitoring of any
Fauna	trees of the riverbeds and unusual signs of animal habitat.
	tunnels outcrops will be
	avoided wherever possible.
	- A fauna survey will be
	conducted to determine the
	effect of fragmented habitat
	on game species should the
	need arise.
	- No animals shall be killed,
	captured or harmed in any
	way.
	- No foodstuff will be left
	lying around as these will
	attract animals which might
	result in human-animal
	conflict.
	- Care will be taken to ensure
	that no litter is lying around
	as these may end up being
	ingested by wild animals
	- No animals shall be fed. This
	allows animals to lose their
	natural fear of humans,
	natural toal of numans,

Impact on - Environmental - Environmental education awareness, and regular monitoring be adhered to before clearing roads, trenching and excavating.  - Paths and roads will be aligned to avoid root zones. Permeable materials will be used wherever possible.  - The movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive areas will be avoided.  - The movement of vehicles will be restricted to certain tracks only.  - Areas with species of concern will be avoided.  - Ministry of Environment
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concern will be avoided.  - Ministry of Environment
- Ministry of Environment
and Tourism will be
informed of any protected
species which will be
transplanted in consultation
with MET.
Impacts on - The population change can Public meetings will be held by
Socio- be mitigated by employing the proponent whenever
Economic people from the local necessary.
community and encouraging
the contractors to employ
local individuals.

	- The perception of risks will	
	be mitigated by putting up	
	safety signs wherever	
	possible and ensuring that all	
	employees and visitors to the	
	site undergo a safety	
	induction course.	
Visual Impacts	Environmental considerations will	Employees will be trained on the
	be adhered to at all times before	importance of minimizing visual
	clearing roads, trenching and	impacts.
	excavating.	
Generation of	Commit to the management of solid	Transportation of solid waste to a
Solid Waste	waste life cycle by all the employees	registered site for disposal.
	and contractors of the site.	
Noise	Disturbance to fauna that roam the	Restriction duration of noise
	area will be minimized by training	pollution.
	the employees on ways to minimize	
	noise.	
Air quality	- All staff on should be	
	equipped with dosimeters	
	that measure exposure levels	
	to radiation.	
	- All staff must be made aware	
	of the health risk and obliged	
	to wear dust masks.	

### 6.4 Table 2 Summary of Environmental Management Plan during the phases of the project

CONSTRUCTION PHASE			
Environmental	Proposed mitigation measures	Responsibility	Monitoring plan
impacts			
Solid waste	- Any debris should be collected by	Management	Presence of well-
	a waste collection company		Maintained

		receptacles and
	- If trenches are dug, waste should	central collection
	be re-used or backfilled.	point.
	- The site should have waste	
	receptacles with bulk storage	
	facilities at convenient points to	
	prevent littering during	
	exploration.	
Oil leaks and	- Vehicles and equipment should be Proponent	No oil spills and
spills	well maintained to prevent oil	leaks on the site
	leaks.	
	- Contractor should have a	
	designated area where	
	maintenance is carried out and	
	that is protected from rainwater.	
Visual	- Environmental considerations Management	Employees will be
	will be adhered to at all times	trained on the
	before clearing roads, trenching	importance of
	and excavating.	minimizing visual
		impacts.
Archaeological	- Adhere to practical guidelines Management	
Sites	provided by an archaeologist to	
	reduce the archaeological impact	
	of mineral exploration activities.	
	- All archaeological sites to be	
	identified and protected before	
	further exploration commences.	
Air pollution	- Maintenance of vehicles and Site manager	Control amount of
	equipment.	dust produced
	- Control speed and operation of	
	construction vehicles.	

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	- Prohibit idling of vehicles.		
	- Workers should be provided with		
	dust masks if working in sensitive		
	areas.		
Noise pollution	- Field work should only be carried	Proponent and	Control amount of
	out only during daytime at a	management	noise
	specific time.		
	- Workers should wear earmuffs if		
	working in noisy section.		
	- Management to ensure that noise		
	is kept within reasonable levels.		
Soil pollution	- Clearly mark/demarcate vehicle	Project	Proper planning
P COLUMN	routes.	coordinator	and management
	- No worker should ever drive off	Management	
	road, but to stick to the	and park	
	demarcated routes.	warden	
	demarcated rodies.	waruch	
Flora	- Care should be taken to	Management	Warning signs on
riora	avoid/minimize destruction of	_	site and restored
		and proponent	
	endemic and Red Data Species.		vegetation
	- A geologist should be consulted		
	with respect to the viability of		
	moving the trench to avoid		
	destruction of fragile species.		
Fauna	- Some habitat areas such as trees	Management	Regular
	of the riverbeds and tunnels		monitoring of any
	outcrops will be avoided		unusual signs of
	wherever possible.		animal habitat.
	- A fauna survey will be conducted		
	to determine the effect of		
	fragmented habitat on game		
	species should the need arise.		
	species should the need arise.		

Occupational Health and Safety	<ul> <li>No animals shall be killed, captured or harmed in any way.</li> <li>No food will be left lying around as these will attract animals which might result in human-animal conflict</li> <li>Provide Personal Protective Equipment Train workers on personal safety and how to handle equipment and machines.</li> <li>A well-stocked first aid kit shall be maintained by qualified personnel.</li> <li>Provide sufficient and suitable</li> </ul>	Proponent	- Workers using protective equipment Presence of Well stocked first aid kit.
	sanitary conveniences which should be kept clean.		- Clean sanitary facilities.
<b>OPERATIONA</b>	L PHASE		
Oil leaks and spills	<ul> <li>Impervious PVC sheets should be deployed as flooring and covered with sand to absorb spillages</li> <li>Should spillages occur, contaminated sand needs to be removed and stored in a drum, to be later removed to an approved disposal site</li> </ul>	_	To oil spills and eaks on the site.
Solid waste	<ul> <li>Under no conditions should any waste be buried or burned at the site</li> <li>Minimize solid waste generated on site.</li> </ul>	Management M	resence of well-Maintained eceptacles and entral collection oint.

	- Waste to be deposited at a	
	demarcated waste site in the park	
	or if it needs to be removed to	
	designated sites outside the park	
Visual	- Environmental considerations Park ward	dens Employees will be
	will be adhered to at all times and	trained on the
	before clearing roads, trenching Managemer	nt importance of
	and excavating.	minimizing visual
	- Siting of roads should avoid the	impacts.
	traversing of tops of ridges and	
	always use of existed roads rather	
	than creating new ones.	
	- Erected infrastructure should be	
	sited in depressions not on hill	
	tops or rises and should not be	
	visible from any major tourist	
	roads lookout points.	
Archaeological	- Adhere to practical guidelines Managemer	t Update Register of
Sites	provided by an archaeologist to	all archaeological
	reduce the archaeological impact	sites identified.
	of mineral exploration activities.	
	- Should any item of interest be	
	located, all activities need to cease	
	immediately at that location, and	
	notify the National Monuments	
	Council.	
Noise pollution	- Workers to wear earmuffs if Proponent	Control amount of
	working in noisy section Managemer	nt noise
	- Management to ensure that noise	
	is kept within reasonable levels.	
Soil pollution	- The top soil needs to be removed Project	Proper planning
	and stockpiled coordinator	and management

	- Stockpiled soil must be covered to	Management	
	prevent it from being windblown	and park	
	within three months	warden	
	- All hydro-carbon products need to		
	be stored in a bunded area, to		
	avoid any accidental spillages.		
Flora	- Care should be taken to	Management	Warning signs on
	avoid/minimize destruction of endemic	and contractor	site and restored
	and Red Data Species.		vegetation
	- A geologist should be consulted		
	with respect to the viability of moving the		
	trench to avoid destruction of fragile		
	species.		
Fauna	- Strict employee's code of conduct	Management	Regular
	including prohibition of hunting		monitoring of any
	or trapping or interfering in any		unusual signs of
	manner with any wild animals.		wild animal
	- No feeding of wild animals		habitat.
	should be allowed.		
	- Litter should be prevented and		
	adequately disposed of to prevent		
	attracting scavenging wild		
	animals.		
Environment	- Train workers on personal safety	Management	Provide sanitary
Health and	and disaster preparedness.		facilities.
Safety	- A well-stocked first aid kit shall		
	be maintained by qualified		
	personnel.		
	- Report any accidents / incidences		
	and treat and compensate affected		
	workers.		

	- Provide sufficient and suitable		
	sanitary conveniences which		
	should be kept clean.		
	-		
	Safety Audits.		
Fire	- Firefighting emergency response	Management	- Proof of
preparedness	plan.		inspection
	- Ensure all firefighting equipment		on
	are regularly maintained, serviced		firefighting
	and inspected.		equipment
	- Fire hazard signs and directions to		- Fire Signs
	emergency exit, route to follow		put up in
	and assembly point in case of any		strategic
	fire incidence.		places.
			- Availabilit
			y of
			firefighting
			equipment.
DECOMMISSION	ONING PHASE		түмүст
Solid waste	- Solid waste should be collected	Proponent and	Amount of waste
Sonu waste		-	
	by a contracted waste collection	Management	on
	company		Site.
	- Excavation waste should be re-		Presence of well-
	used or backfilled.		maintained
			receptacles and
			central collection
			point
Noise & Air	- Maintain plant equipment.	Proponent and	Amount of noise
pollution	- Decommissioning works to be	Management	
	carried out only during daytime.		
1	carried out only during daytime.		
	- Workers working in noisy section		
	- Workers working in noisy section		

	- Workers should be provided with		
	dust masks.		
	dust masks.		
Soil pollution	- The contaminated soil needs to be	Proponent	
	treated either by adding bacteria		
	which break down spilled hydro-		
	carbon, or by simply distributing		
	the soil thinly in direct sunlight to		
	naturally break down the hydro-		
	carbons.		
Disturbed	- Undertake a complete	Management 1	Management
Physical	environmental restoration		
environment	program and introducing		
	appropriate vegetation		
Occupational	- Provide Personal Protective	Proponent	- Workers
Health and	Equipment.	-	using
Safety	- Train workers on personal safety		Protective
	and how to handle equipment and		Equipment.
	machines.		- Presence of
	- A well-stocked first aid kit shall		a First Aid
	be maintained by qualified		Box.
	personnel.		Bon.
	- Demarcate area under		
	decommissioning.		
Visual	- Rake the track or drag tyres to	1	Rehabilitation of
	smooth tracks		
pollution			every foreign
	- Removal of all construction		material at the site
	equipment, surplus material and		
	temporary structures, fences and		
	works of every kind, and		
	everything that was brought at the		
	site.		

#### 6.5 Monitoring, Auditing and Reporting

#### 6.5.1 Inspections and Audits

Performance against the EMP commitments will need to be reviewed throughout the project's life cycle, with corrective action implemented as needed, to guarantee compliance with the EMP and any Enviro-legal obligations. This will include conducting both the internal inspections/audits and external audits, documentation, reporting, establishing an environmental management systems, adhere to the drafted environmental policy, maintain the impact aspect register, drafting procedures and method statements by the relevant responsible mineral exploration staff and contractors, determining the relevant roles and responsibilities, and others.

Internal compliance monitoring will be implemented in the following manner:

- a) All contractors will be subjected to project kick-off and close-out audits. This applies to all phases of the process, including drilling contract work:
- Before a contractor begins work, the applicable phase site manager will perform an audit to confirm that the EMP commitments are reflected in the contractor's standard operating procedures (SOPs) and method statements.
- After a contractor's work is completed, the applicable phase site manager will conduct a final close-out audit of the contractor's performance against the EMP commitments.
- b) During the construction/initial and decommissioning phases, monthly internal EMP performance audits will be conducted.

#### 6.5.2 Roles and responsibilities for environmental management

#### 6.5.2.1 Communication between Parties

Emphasis will be put towards open communication between all parties, in order to reach a proactive approach towards potential environmental issues deriving from the project. This approach should guarantee that environmental impacts are anticipated and prevented, or minimised, rather than adopting a negative "policing" approach after negative impacts have already occurred. The importance of a proactive approach cannot be overemphasised, particularly in relation to preventing unnecessary tracks, and damage to vegetation (i.e. protected and endemic species) as these impacts cannot easily be remedied.

#### 6.5.2.2 The Operating Company

The company is ultimately responsibility for all stages of the project and the impacts resulting from those activities. The responsible persons will be the company's Environmental Control Officer (ECO) and Managing Director to ensure that:

- The EMP and its environmental specifications are included in contractual documents and it is required that contractors, and subcontractors, consultants etc. do meet the EMP requirements;
- The company and all its subcontractors, consultants etc. comply with all Namibian legislation and policies and any relevant International Conventions;
- Compliance with the environmental specifications are enforced on a day-to-day basis;
- Environmental audits are conducted periodically by a suitably qualified ECO to confirm that the environmental requirements are properly understood and effectively implemented;
- Sufficient budget is provided to implement those measures that have cost implications;
- The site manager must commission tree surveys well in advance of planned road construction or drill pad preparation so that the necessary site visits by forestry personnel and forestry permits are acquired; and,
- Open an effective communication between all parties concerning environmental management on the project.

#### 6.5.2.3 Site managers

Day-to-day responsibility for environmental management will be assigned to the ECO and Manager Field Operations site manager for the duration of all operational activities to:

- Be familiar with the contents of the EMP and applicable sections of the EIA and the measures recommended therein;
- Monitor compliance with the environmental specifications on a daily basis and enforce the environmental compliance on site by communicating the ECO's directions to all personnel involved;
- In the event of any infringements leading to environmental damage, personnel need to consult with the ECO and seek advice on any remedial measures to limit or rectify the damage;
- Maintain a record (photographic and written) of "before-and-after" conditions on site;
- Facilitate communication between all role players in the interests of effective environmental management.

#### 6.5.2.4 Environmental Control Officer (ECO)

KMZ Enterprises cc must appoint a suitably qualified ECO who is responsible to:

- Undertake environmental audits of overall compliance with the environmental specifications. This should be done at least bi-annually for the warehouse.
- Submit a site inspection report to the Managing Director and MFO;
- Advise the MFO on interpretation and implementation of the environmental specifications as required; and,
- Make recommendations for remedial action in cases of non-compliance with the environmental specifications.

#### 6. 5.3 Environmental Management System Framework

The proponent and its contractors will create and implement an Environmental Management System (EMS) in order to apply Environmental Management Practices. The structure for compiling a project EMS is established in this section. All environmental management paperwork will be kept in a paper and/or electronic system by the applicable exploration manager. These will be classified into the following groups:

#### a) Policy and Performance Standards

The EMP includes a draft environmental policy as well as accompanying objectives, targets, and pledges. These can be adjusted by the mineral explorer as needed.

#### b) Enviro-Legal Documentation

The proponent will always have a copy of the approved environmental assessment and EMP documents. The exploration team will also save copies of the Environment Clearance Certificate and all other related authorizations and licenses. In addition, a record of the project's applicable laws and regulations will be maintained and updated as needed.

#### c) Impact Aspect Register

The Aspect-Impact Register with the Project Activity is based on this Draft EMP, which specifies the foreseeable project features and related possible effects of the proposed project. It should be noted, however, that more project aspects and related affects may occur during the project's life cycle and will need to be recorded in the Aspect-Impact Register. The impact identification principles outlined in the scoping study can be utilized to update the Register in

this regard. During the project's life cycle, the applicable exploration manager can make changes to this approach as needed.

#### d) Procedures and Method Statements

Procedures and method statements will be drafted by the relevant accountable mineral exploration employees and Contractors in order to influence the promises included within the EMP. These may include, but are not limited to:

- Standard operating procedures for the implementation of the environmental action plan and management program.
- Procedures for dealing with incidents and emergencies.
- Procedures for auditing, monitoring, and reporting, as well as
- EMP compliance method statements for ad hoc actions not explicitly covered in the EMP action plans.

#### e) Register of Roles and Responsibilities

Relevant roles and duties will be identified during project planning and risk assessments. All environmental commitment duties and obligations must be documented in a register. The register must include pertinent contact information and be updated as needed.

#### f) Site Map

It is essential to keep an up-to-date map of the exploration site that shows all project activities. The following detail, in addition to the project layout, must be depicted:

- Material handling and storage
- Waste management (collection, storage, and transfer, among other things);
- Areas with a high level of sensitivity;
- The location of the incident and emergency equipment; and the location of the accountable parties.

#### g) Environmental Management Schedule

The applicable phase site managers and/or relevant Contractors must keep a schedule of environmental control actions. The exploration manager is responsible for keeping a master schedule of all such activities up to date. Environmental risk assessments, environmental management meetings, and other scheduled environmental actions include, but are not limited to:

- Handling, managing, and rehabilitating soils
- Waste removal
- Inspection and repair of incident and emergency response equipment
- Environmental education
- Participation of stakeholders; environmental inspections; and
- Auditing, monitoring, and reporting are all part of the auditing, monitoring, and reporting process.

#### h) Change Management

The EMS must have a change management procedure in place. In this regard, environmental documentation, procedures and method statements, action plants, and other related documents will be updated and revised as needed to account for the following scenarios:

Changes in standard operating procedures (SOPs), scope changes, ad hoc activities, project phase changes, and duties or roles changes

#### 6.6 Closure Plan

The proposed project's closing plan is to develop a secure, stable, and non-polluting post-prospecting landscape that may support integrated, self-sustaining, and value-generating activities, leaving a positive legacy in the process. The closure plan's goals are to:

- Prioritizing the creation of a functional post-prospecting environment that allows for self-sustaining agricultural operations whenever possible.
- To promote the restoration of terrestrial and aquatic wetland biodiversity, when appropriate.

#### 6.6.1 Alternatives Considered

Because this is an exploration project, the proposed project is not complicated, and the hazards associated with prospecting are well understood and may be mitigated once the project is completed. There are few alternatives for closure. There are just two activity possibilities for the closure plan that have been considered:

#### First alternative:

Closure or backfill of boreholes with overburden removed during drilling (best option).

#### **Second alternative:**

Leaving boreholes open to allow for groundwater recharge from surface run-off.

#### 6.6.2 Preferred Alternative: Rehabilitation/ Backfill of boreholes

The restoration of a disturbed environment that has been deteriorated as a result of operations such as mining, road construction, or waste disposal to a land use similar to that which existed before the activity began is known as rehabilitation. This involves aesthetic concerns, so that a disturbed region does not stand out from the surrounding surroundings. Backfilling boreholes with overburden removed during development and covering with growth medium to produce vegetation is the preferred technique for preserving physical, chemical, and biological ecosystem functions in degraded environments. This option provides a number of benefits, which are listed below:

#### **Benefits:**

- The site will be pleasing to the eye
- The location will blend in with the surroundings
- The site will be a suitable habitat for fauna and flora again
- The site will be safe and pollution-free

Option 1, which is to leave boreholes unbackfilled, carries the risk of these boreholes filling with water, which could attract wildlife and communities, resulting in drowning and the possibility of getting trapped in the declines. Backfilling is required to reduce these dangers.

#### 6.6.3 Closure Assumptions

This closure plan was created using the minimal information available, including environmental data. During the operational phase, some of the already accessible data may need to be enhanced. To construct the suggested closure actions, numerous assumptions were made about general conditions, as well as the closure and rehabilitation of the site's facilities. These assumptions will be examined and amended as more information becomes available during operations.

The following are some of the assumptions that were utilized to create this plan:

- Once the last intended weight of minerals has been removed from the site for laboratory testing, the closing period will begin.
- The recommended prospecting sites will be followed to the letter in order to minimize potential consequences.
- Vegetation will be established in accordance with the native vegetation of the project area.
- Water management infrastructure constructed during the operational period will be kept for closure / end of project life if needed.

- There are few chances to build infrastructure on site, and any infrastructure that is created will be of minimal utility to the community. As a result, all structures will be demolished.
- All hazardous and household garbage will be carried offsite to licensed landfills for disposal.
- Existing roads will be utilized to the greatest extent practicable. Where access tracks have been built in the absence of roads, they will be restored and closed as part of the standard closure process.

#### 6.6.4 Closure and Rehabilitation Activities

The remediation procedures that will be conducted when the projected prospecting activities reach the end of their life cycle are explained below:

#### 6.6.4.1 Infrastructure

All infrastructure will be decommissioned, and the footprints will be repaired so that vegetation can grow. To minimize any surplus materials at closure, material inventories will be maintained at the end of prospecting activities. Equipment and materials of value that aren't needed for post-closure operations will be sold or removed from the site as much as possible. Scrap and salvageable equipment will be removed from the site and sold to recyclers.

Following the completion of demolition activities, a soil contamination investigation will be carried out. The goal is to identify potential contaminated locations and then create and implement appropriate remediation methods to ensure that soil contaminants are removed. The following actions will be taken to bring the situation to a close:

- Prior to undertaking any decommissioning work, all power and water services will be disconnected and certified as safe
- All remaining inert equipment and decommissioning waste will be disposed of at the nearest licensed general waste disposal facility
- Salvageable equipment will be removed and transported offsite prior to and during decommissioning
- All tanks, pipes, and sumps containing hydrocarbons will be flushed or emptied prior to removal to ensure no hydrocarbon/c is present

#### 6.6.4.2 Boreholes

Boreholes will be backfilled with overburden stripped before prospecting activities begin. All overburden should be dumped into the vacuum, and the finished surface should be moulded to match the surrounding terrain while remaining free draining. After backfilling, a growth medium cover will be installed, and vegetation will begin to grow.

#### 6.6.4.3 Roads

- Existing roads will be utilized to the greatest extent practicable. All signage, fences, and shade structures, as well as traffic barriers, will be removed as part of the road and parking area closure.
- All 'hard top' surfaces, as well as any concrete structures, must be ripped.
- All potentially contaminated soils must be identified and delineated for further treatment
- All haul routes treated with saline dust suppression water must be treated, with the upper surface pulled off and disposed of in authorized contaminated disposal places.

#### 6.6.4.4 Remediation of Contaminated Areas

- All hydrocarbon-containing tanks, pipes, and sumps will be flushed or emptied, and removed soils will be treated according to the nature and amount of the pollution.
- The liquid storage tanks will be drained, the structure will be removed/demolished, and the sub-surface holes will be plugged; and
- All equipment used to store or transport chemicals will be cleaned and disposed of at a proper disposal facility.

#### 6.6.4.5 Vegetation

Using non-invasive plants that meet the habitat's criteria, successful revegetation will help control erosion of soil resources, maintain soil productivity, and reduce sediment loading in streams (e.g. soils, water availability, slope and other appropriate environmental factors). Invasive species will be avoided, and the area will be managed to keep them from spreading. On slopes, naturally occurring grassland species will be planted to combat the effects of erosion. These plants will increase soil holding capacity while also lowering runoff velocity. The flat areas will be re-vegetated with the goal of establishing a long-term ecology. Before vegetation is removed, the presence of protected plant species must be identified, and the necessary licenses for destruction or relocation must be secured.

#### 6.6.4.6 Waste Management

Hazardous waste will be controlled, sorted, and disposed of, while non-hazardous garbage will be disposed of in a nearby permitted landfill site. Scrap and waste steel will be sold to recyclers. Wastes to be contained in animal-proof drums with a solid lid, and drums be in an enclosed fence, to prevent windblown debris from escaping, and scavenging animals from rummaging through the waste.