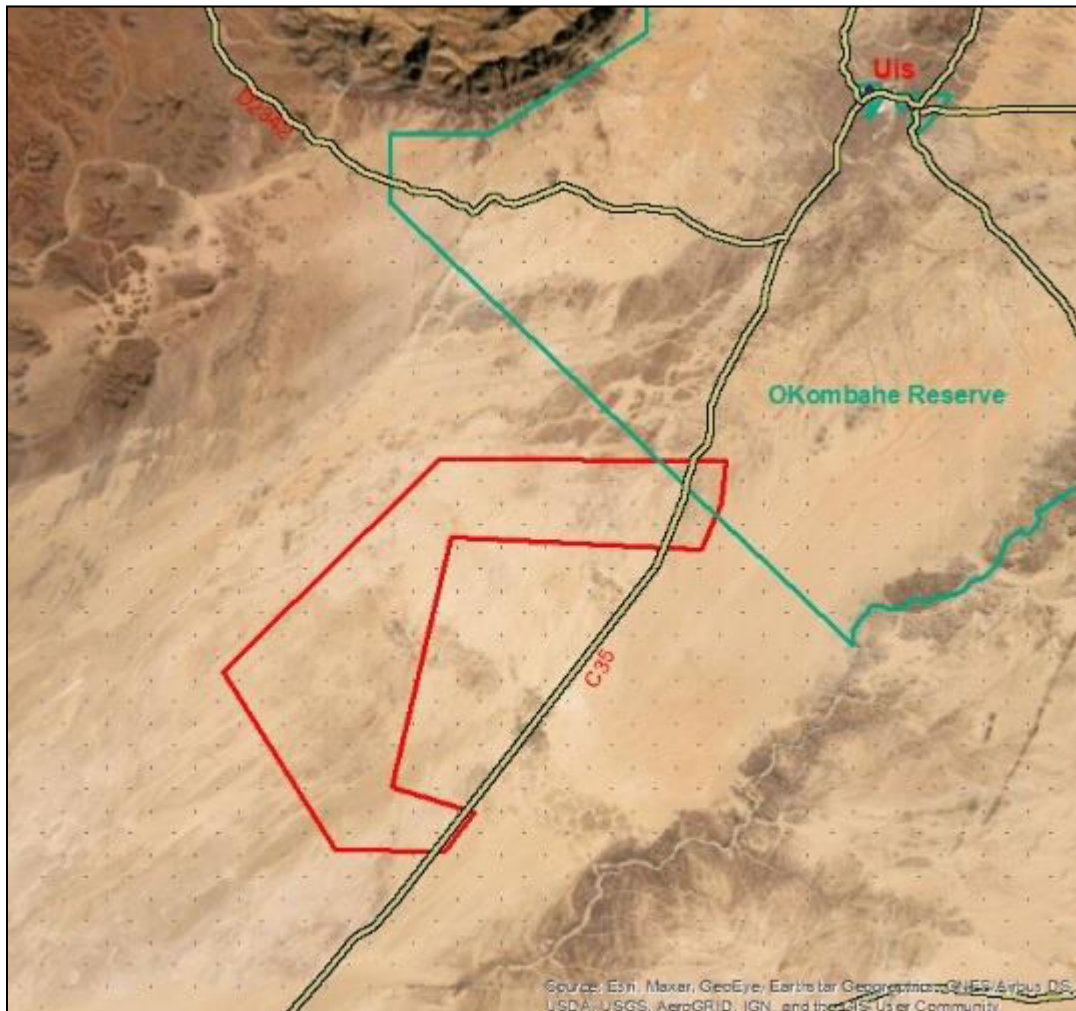


**A SCOPING REPORT ON THE ENVIRONMENTAL IMPACT ASSESSMENT FOR
THE FOR PROPOSED MINERAL PROSPECTING AND EXPLORATION ON EPL
8841, DAURES CONSTITUENCY, ERONGO REGION.**



Prepared by:




**Minera-Xplore Consultancy CC
P.O. Box 31671, Windhoek,
Tel: (+264)085 761 4750**

Proponent:

**Liina Ndinela Hipunya
P.O. Box 4497
Windhoek, Namibia
Contact: (+264) 81 468 5578**

APP-

DOCUMENT DATA SHEET

Title	A Scoping Report on the Environmental Impact Assessment (EIA) for the proposed mineral prospecting and exploration on EPL 8841, Dâures Constituency, Erongo Region		
Report Status	Final		
Proponent	Liina Ndinela Hipunya P.O. Box 4497 Windhoek, Namibia Contact Number :+264 81 468 5578 Email: lixuanfaith@yahoo.com		
Environmental Practitioner	Minera-Xplore Consultancy CC P.O. Box 31671, Windhoek Contact Person: Ms Nangula Ndakunda Contact Number: +264 85 761 4750 Email: info@minera-xplore.com or frontdesk@minera-xplore.com		
MET Project No.	APP-		
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	Name	Signature	Date
Author	Nangula Ndakunda		22/09/2022

EXECUTIVE SUMMARY

Liina Ndinelaο Hipunya (hereinafter referred to as the proponent), provisionally acquired mineral rights over the project area on Exclusive Prospecting License (EPL8841), for base and rare metals, dimension stone, industrial minerals, non-nuclear fuels, precious metals, precious stones and semi precious stones. EPL8841 is located in western central Namibia in Erongo Region, Dâures Constituency. The project area is gazetted as the Tsiseb (Hada-Huigu) conservancy by the Ministry of Environment, Forestry and Tourism in 2001, sandwiched by the Dorob national park on the left and #Gaingu Conservancy on the right.

The proposed exploration and mining activities falls under the activities that are listed in the Environmental Management Act, 2007 (Act No. 7 of 2007) and Environmental Regulations procedure (GN 30 of 2012). These activities cannot be undertaken without an Environmental Clearance Certificate (ECC). In order to obtain an Environmental Clearance Certificate for the proposed activities, the proponent is required to have undertaken an Environmental Impact Assessment (EIA) study and Environmental Management Plan (EMP). As such, an environmental clearance certificate must be applied for in accordance with regulation 6 of the 2012 environmental regulations. Therefore, the proponent has appointed Minera-Xplore Consultancy CC to conduct the Environmental Impact Assessment for the proposed mineral prospecting and exploration on Exclusive Prospecting License (EPL8841).

The proposed exploration activities will run for three years subject to a two year renewal if the prospects are favorable. Activities will include: geophysical surveys, geochemical survey, geological mapping, trenching, drilling and geochemical sampling as well as laboratory analysis aimed discovering mineral resources of economic interest. The proponent plans to implement these activities as soon as the clearance certificate has been issued. EPL 8841 is located on the Cape-Cross-Uis pegmatite belt, which consists of a wide range of syn-, late- and post-tectonic granites and pegmatites that are of Pan African age, which has been found to host minerals of economic value such as lithium, tin, tantalum, tungsten and REE. The Cape-Cross-Uis pegmatite belt is approximately 120 km long and up to 24 km wide and it is thought to represent a half-

graben with the prominent Uitseb Thrust fault juxtaposing the stratigraphically higher Amis River Formation. The lithium-cesium-tantalum (LTC) pegmatites are restricted to the schistose Amis River Formation within the half-graben

Once the deposit proves to be economically feasible, conventional small scale open pit mine development will proceed. Since the targeted lithium-cesium-tantalum (LTC) pegmatites extends close to the surface, it is assumed that mining will be open pit, with approximately 10 m bench heights for both mineralized material (pegmatite) and waste (shist). Mining will be by conventional trucks and excavators. Drilling and blasting will be required to break in-situ rock. Run of mine (ROM) mineralized, material will be loaded onto a dump truck using an excavator and transported to the plant for concentration. Waste material will be backfilled onto the pit footfall using excavator.

Based on the findings of this report, the proposed project benefits outweigh project negative impacts. Potential positive and negative impacts of the proposed project were identified assessed, and mitigation measures are provided in the EMP. These mitigation measures and recommendations provided are deemed sufficient to minimize the identified impacts to acceptable levels. The project area is not pristine, it already hosts other authorized mining activities such as Uis tin mining in Uis settlement, therefore the natural setting of the area is accustomed to similar operations and that potential negative impact of the proposed project on the natural environment of the surrounding area will be negligible. This project has the potential to contribute to Namibia's economy both directly and indirectly through taxes and royalties, employment creation and socio-economic development, hence the need for this project. It is hereby recommended that proposed lithium mining operations and exploration activities on Exclusive Prospecting License (EPL8841), be granted an Environmental Clearance Certificate, provided that: All mitigations provided in this report are implemented as stipulated and where required and emphasized, improvement should be effectively put in place.

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ACRONYMS AND ABBREVIATIONS

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

Acronyms / Abbreviations	Definition
DEA	Directorate of Environmental Affairs
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
GDP	Gross Domestic Products
GPS	Geographical Positioning System
HIV/AIDS	Human Immunodeficiency Virus/Acquire Immunodeficiency Syndrome
I&AP	Interested and Affected parties
LTC	lithium-cesium-tantalum
MCs	Mining Claims
MEFT	Ministry of Environment, Forestry and Tourism

MEFT: DEA	Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs
MME	Ministry of Mines and Energy
NDP5	Fifth National Developmental Plan
REE	Rare Earth Elements
Target area	The area covered by the mining claims

1. Introduction

1.1. Project Overview

Liina Ndinelaio Hipunya (hereinafter referred to as the proponent), provisionally acquired mineral rights over the project area on Exclusive Prospecting License (EPL8841), for base & rare metals, dimension stone, industrial minerals, nuclear fuels, non-nuclear fuels, precious metals, precious stones, semi precious stones from the Ministry of Mines and Energy (MME). The Ministry of Mines and Energy (MME), through the department of Mines undertakes to exploit the country's mineral resources through issuance of mineral rights and it is through this process that EPL 8841 was provisionary issued, pending approval subject to an Environmental Clearance Certificate (ECC). The issuance of an Environmental Clearance Certificate by Ministry of Environment, Forestry and Tourism (MEFT) will pave way for the envisaged exploration activities.

The exploration process will involve geophysical surveys, stream sediment sampling, soil sampling, laboratory analysis, trenching, RC and diamond drilling. The focus of the exploration to search for mineralization of economic value and the exploration strategy to be employed will revolve around the mineralization model. EPL 8841 is located on the Cape-Cross-Uis pegmatite belt, which consists of a wide range of syn-, late- and post-tectonic granites and pegmatites that are of Pan African age, which has been found to host minerals of economic value such as lithium, tin, tantalum, tungsten and REE.

1.2 Project location

The project area (EPL 8841) is accessible 35 km southwest directly via the C35 road, connecting Henties Bay to Uis Settlement. The area is located in western central Namibia in Erongo Region (Fig. 1), Dâures Constituency (Fig. 2). It covers state land, while its northeastern portion is covered in Okombahe reserve (Fig. 3). The area is gazetted as the Tsiseb (Hada-Huigu) conservancy by the Ministry of Environment, Forestry and Tourism in 2001, it is sandwiched by

the Dorob national park on the left and #Gaingu Conservancy on the right. From Windhoek, the capital city of Namibia the project area is accessed from via the sealed (tarred) B1 highway north to Okahandja, the sealed (tarred) B2 highway from Okahandja westwards to Wilhelmstal, and the sealed (tarred) C36 main road northwestwards to Omaruru. From Omaruru westwards to Uis settlement, the C36 is a gravel road. The distance by road from Windhoek to Uis is approximately 330 km. From Walvis Bay, access is via the B2 sealed (tarred) highway northwards to Swakopmund, the main C34 salt road north along the coast to Henties Bay, and then the gravel main M76/C35 road northeast to the village of Uis. The total driving distance is approximately 225 km. GPS coordinates for EPL 8841 are given in Table 1 and the entire area covers a total of 46 937.56 Hectares.

Table 1: Coordinate demarcation boundary for EPL 8841.

No.	Latitude	Longitude	No.	Latitude	Longitude
1	21° 29' 59.00" S	14° 32' 11.00" E	6	21° 44' 59.00" S	14° 30' 00.00" E
2	21° 30' 00.00" S	14° 45' 13.00" E	7	21° 46' 05.00" S	14° 33' 46.00" E
3	21° 31' 57.00" S	14° 45' 02.00" E	8	21° 47' 52.00" S	14° 32' 24.00" E
4	21° 34' 05.00" S	14° 44' 05.00" E	9	21° 47' 47.00" S	14° 27' 25.00" E
5	21° 33' 32.00" S	14° 32' 40.00" E	10	21° 39' 40.00" S	14° 22' 17.00" E
Total Area: 46 937.56 Hectares					
Centre point		Latitude		Longitude	
		-21.604292°		14.481031°	
		21°36'15.45"S		14°28'51.71"E	

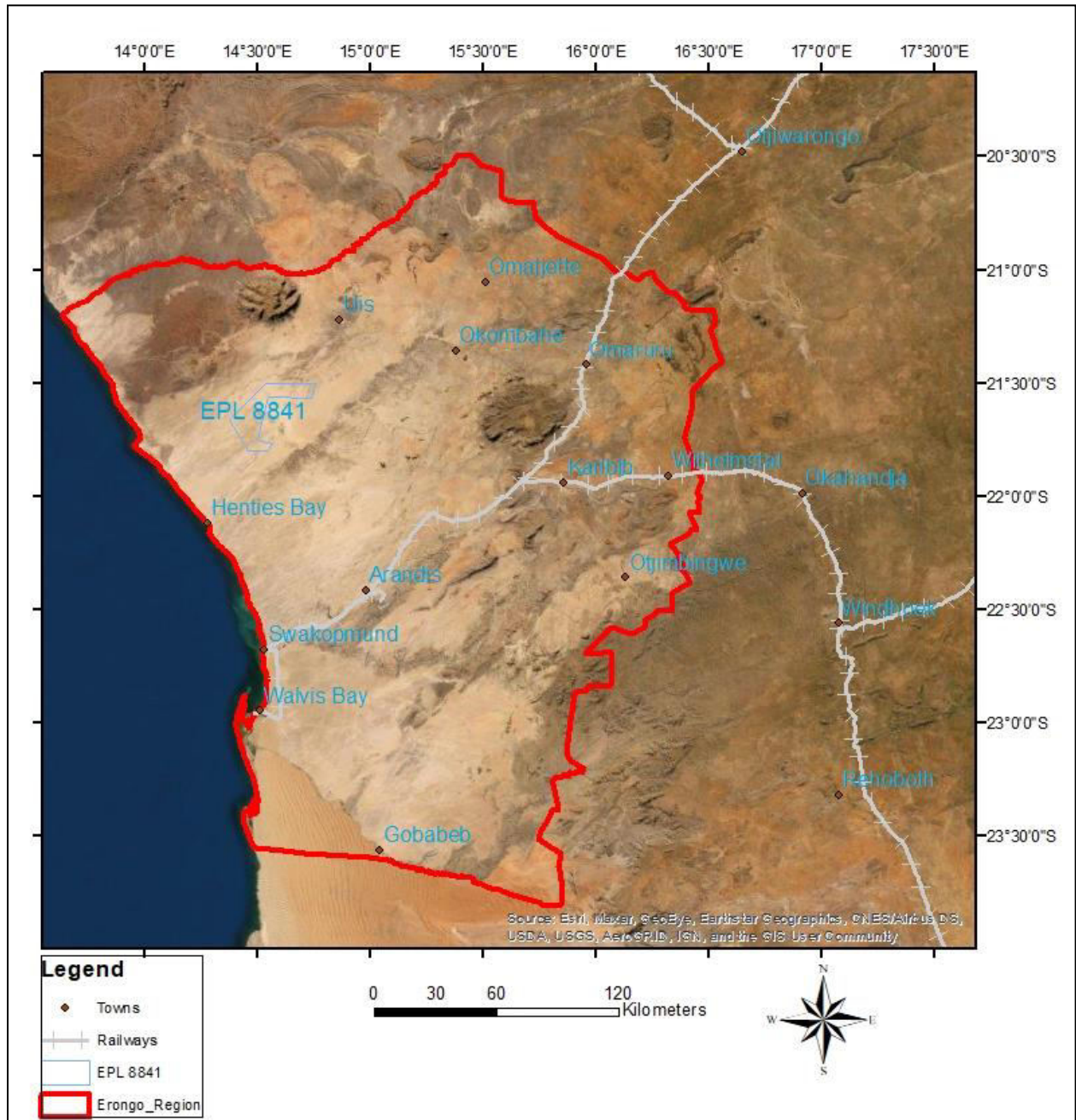


Fig. 1. Locality of EPL 8841 in Erongo Region, western central Namibia.

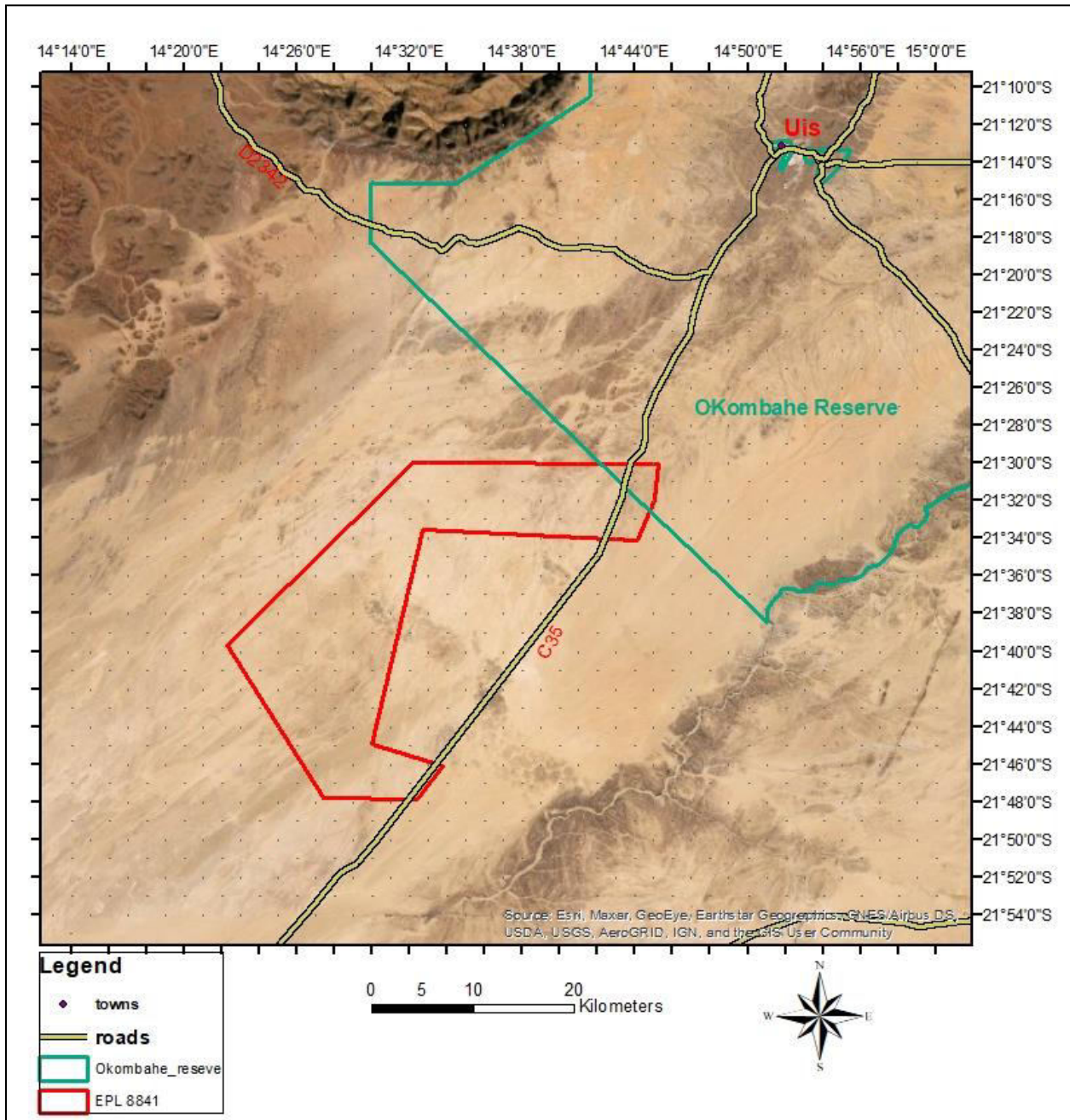


Fig. 2. Google map showing the location EPL 8841, accessible via C35 gravel road approximately 35 km southwest of Uis settlement in Dâures Constituency. The EPL boundary is demarcated by the red polygon.

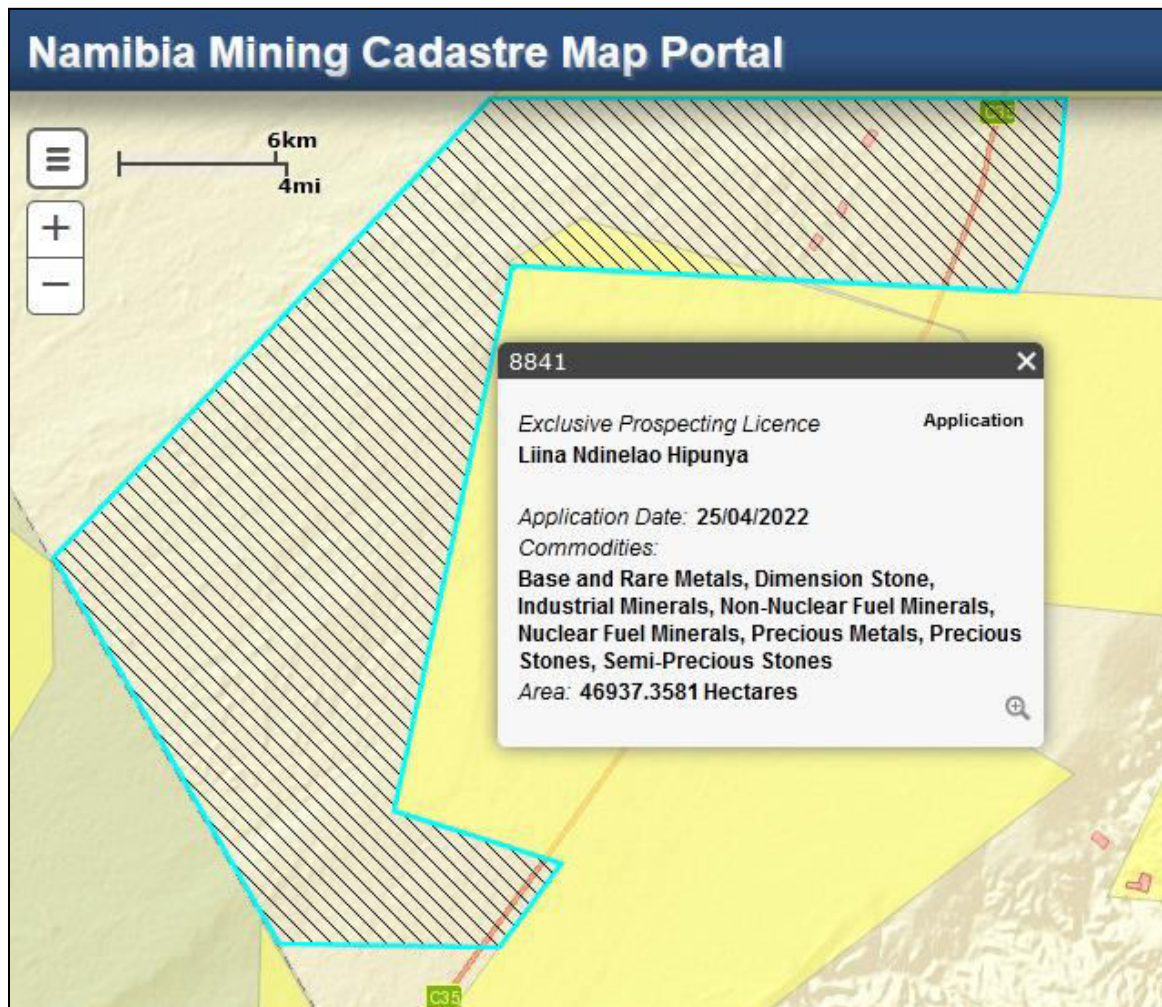


Fig. 3. Exclusive Prospecting License (EPL8841), on Namibia mining cadastre map portal (<https://maps.landfolio.com/Namibia>).

1.3 Terms of Reference

Minera-Xplore Consultancy was appointed by the proponent to undertake a scoping, conduct an Environmental Impact Assessment (EIA) and to prepare an Environmental Management Plan (EMP) for the mineral prospecting and exploration on Exclusive Prospecting License (EPL8841). A site visit to the area took place on the 23rd of June 2022. This assessment study

was carried out in accordance with the Environmental Management Act (No. 7 of 2007) and Environmental Regulations of 2012, as well as the Terms of Reference (ToR) which were provided by the proponent). It is a guiding document which indicates the description of the environment that may be affected by the activity and the manner in which the activity may affect the environment. Information relating to the receiving environment and its social surroundings has been sourced through the following methods:

- Legal and policy review; Identify all legislation and guidelines that have reference to the proposed project.
- Identify existing environmental (both bio-physical and socio-economic) conditions of the area.
- Inform Interested and Affected Parties (I&APs) and relevant authorities of the details of the proposed development and provide them with a reasonable opportunity to participate during the process.
- Consider the potential (both bio-physical and socio-economic) impacts of the development and assess the significance of the identified impacts.
- Document opinions and concerns raised by I&AP's and stakeholders.
- Describe the need and desirability of the activity, propose alternative measures where it is noticed that adverse effects may occur.
- Provide a high level of environmental and social impact assessment on feasible alternatives that were considered.
- Outline management and mitigation measures in an Environmental Management Plan (EMP) to minimize and/or mitigate potentially negative impacts.
- Submit the final assessment report to the competent authority and the Environmental Commissioner.

1.4 Approach to the impact assessment

1.4.1 Objectives of the Environmental Assessment Process

The main objective of this environmental assessment is to determine and assess the potential environmental impacts that are likely to result from the proposed mineral prospecting and exploration on Exclusive Prospecting License (EPL8841). In a nutshell, an environmental assessment process is carried to achieve better developmental interventions through protecting human, physical, and biotic environments. This is one component in the environmental planning and management of projects, that focuses upon the consent stage of the project. The study entails assessments of likely short and long term positive and negative environmental impacts of the activities related to the proposed exploration project.

This Scoping Report (including an assessment of impacts), together with the EMP, will provide sufficient information for the Ministry of Mines and Energy (MME) as the Competent Authority and the Ministry of Environment, Forestry and Tourism (MEFT) to make an informed decision regarding the proposed project, and whether an environmental clearance certificate can be issued or not.

The assessment covered the proposed study for the following developmental stages:

- Pre-construction and Construction
- Operation and ongoing monitoring
- Decommissioning and closure

1.5 Exploration programme activities

Activities will include:

- Geological mapping - Involves visual assessment of outcropping rocks: No environmental impact, no activity footprint to be left behind.
- Ground geophysical surveys—Handheld geophysical equipment or drones are utilized to collect data from subsurface rocks. This is achieved through traversing lithological units

of interest: this process does not leave behind any environmental impact and activity footprint.

- Geochemical sampling –A small holes of roughly a few centimeters deep are dug from which sample/s are collected and the hole is then covered after sampling leaving no activity footprint left behind.
- Trenching–A trench is a ground excavation that generally deeper than its width and narrower than its length. Trenching is mainly for purposes of the orientation of the targeted lithology and mineralization as well as sampling. Impact is localized and the trenches are covered after sampling leaving to no activity footprint.
- Pitting - excavation or diggings of areas are done to obtain a representative bulk sample of the mineralization as well as getting a 3D view of the mineralization. Impact is also localized and the trenches are covered after sampling leaving to no activity foot print.
- RC and diamond drilling - Holes are drilled and drill samples collected will be used for geotechnical analysis and analysis of elements and minerals. Holes are capped after drilling and the drilling site for each hole is localized and rehabilitated after drilling.

1.6 Environmental legal requirements

Mineral prospecting, exploration, and all mining related activities are among the listed activities that may not be undertaken without an Environmental Clearance Certificate (ECC) according to Section 27 (1) of the Environmental Management Act (EMA) (No. 7 of 2007) and its 2012 Environmental Impact Assessment (EIA) Regulations. As such, individuals or organizations may not carry out exploration activities among those listed, without an EIA Study undertaken and an ECC awarded. The listed activities as per EIA regulations that are relevant to the proposed prospecting and exploration activities are as follows:

- 3.1 The construction of facilities for any process or activities which requires a licence, right or other form of authorization, and the renewal of a licence, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act),1992.

- The proponent was conditionally granted Exclusive Prospecting License (EPL8841) by MME, pending clearance certificate (ECC). Therefore, the proponent now requires an ECC from DEA/MEFT for mineral exploration/prospecting.
- 3.2 Other forms of mining or extraction of any natural resources whether regulated by law or not.
- 3.3 Resource extraction, manipulation, conservation, and related activities.
- Soil and rocks will be sampled within selected target areas of the project area.
 - Soil and rocks will be sampled within selected target areas of the project area.
- 8.1 The abstraction of ground or surface water for industrial or commercial purposes.

1.7 Purpose of the Assessment Report

The assessment report is prepared for the Environmental Impact Assessment for Mineral prospecting, exploration. The main purpose of this report is to provide information relating to the proposed exploration and mining activities and to indicate which environmental aspects and potential impacts that have been identified during the screening and assessment phases. Environmental assessment is a critical step in the preparation of an EIA for the proposed exploration activities. The assessment process shall be concluded with the establishment of terms of reference for the preparation of an EIA, as set out by the Ministry of Environment, Forestry and tourism. The purpose of this assessment report is to:

- ❖ Identify any important environmental issues to be considered before the commencement of the proposed exploration and consequently mining activities on mineral prospecting and exploration on Exclusive Prospecting License (EPL8841)
- ❖ To identify appropriate time and space boundaries of the EIA study.
- ❖ To identify information required for decision-making.

As such, the key objectives of this assessment study are to:

- ❖ Inform the public about the proposed exploration activities.

- ❖ Identify the main stakeholders and incorporate their comments and concerns.
- ❖ Define reasonable and practical alternatives to the proposal.
- ❖ To establish the terms of reference for an EIA study.

The assessment study provides a clear description of the environment that may be affected by the activity and the manner in which the activity may affect the environment. Information relating to the receiving environment and its social surroundings has been sourced through the following methods;

- ❖ Site visits to collect primary data;
- ❖ Legal and policy review;
- ❖ Gathering existing information relating to similar developments and issues;
- ❖ Discussions, meetings and site visits with authorities;
- ❖ Opinions and concerns raised by I&AP's and stakeholders; and
- ❖ Qualified opinions from professional studies.

This report is the Assessment Report. Taking the above mentioned into consideration, this report, together with the attached EMP, will provide sufficient information for MEFT to make an informed decision regarding the proposed exploration activities, and whether an environmental clearance certificate can be issued or not. A schematic representation of the EIA process in Namibia is given in Fig. 4.

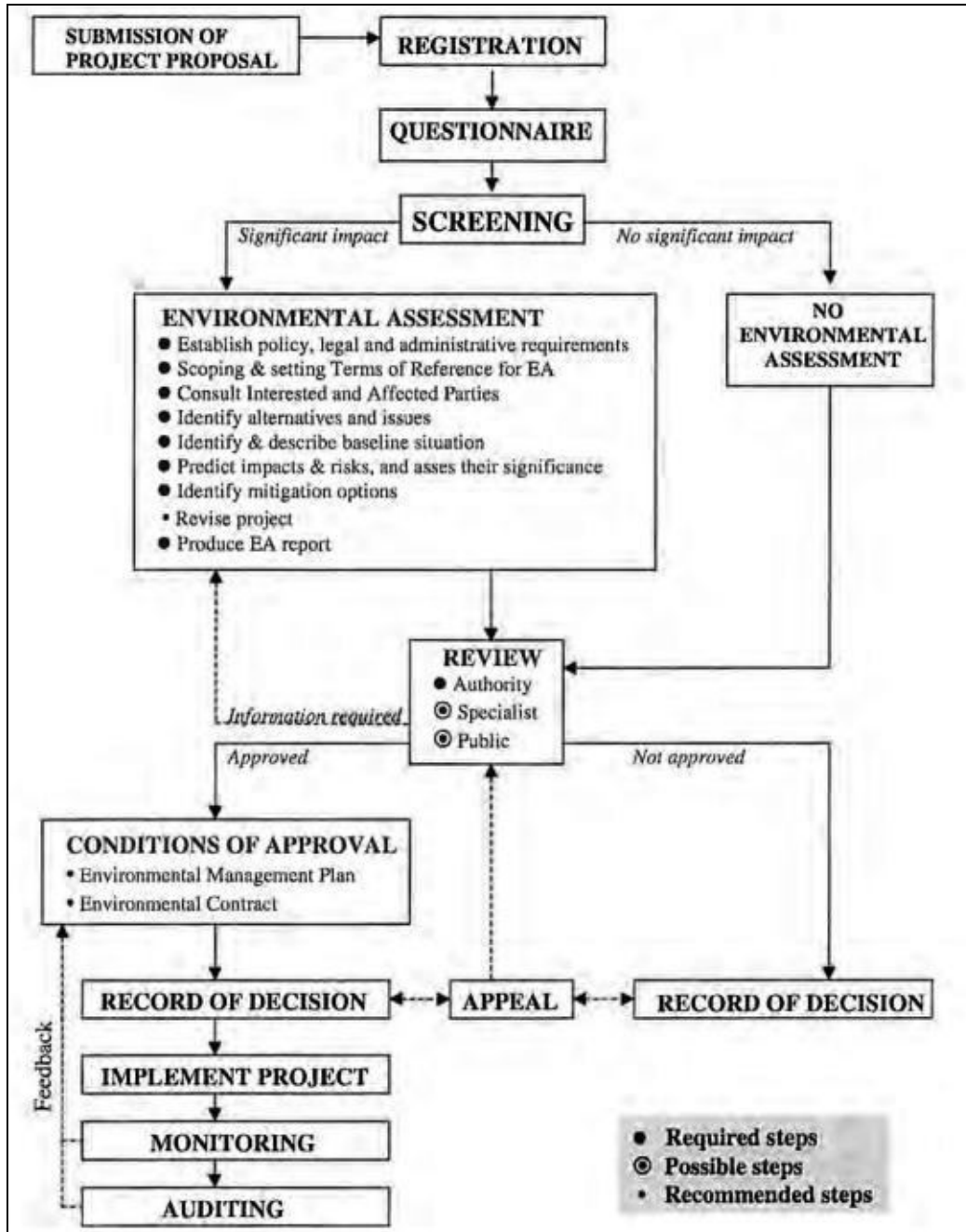


Fig. 4. General schematic presentation of the Environmental Impact Assessment process in Namibia (SELH, 2012).

1.7.1 Environmental Consultant

Minera-Xplore Consultancy (Reg. No. CC/2021/10286) is a wholly Namibian owned close corporation, established in 2021 to provide consulting services to various public and private sectors in areas such as Strategic Environmental Assessments (SEA), Environmental Impact Assessments (EIA) and development of Environmental Management Systems. The Environmental Assessment Practitioner (EAP) for this study is Ms. N Ndakunda. Her main area of expertise includes Mineral exploration, Environmental Management as well as Groundwater exploration and resource management. She holds a B.Sc (Honours) in Geology (University of Namibia), B.Sc (Honours) in Geohydrology (University of Free State) and is currently doing a Master's Degree in Integrated Environmental Management & Sustainable Development (International University of Management). CV is attached for further information on her educational qualifications and experience.

1.8 Synopsis of the EIA process

Environmental Impact Assessment (EIA) Regulations, 2012 and the Environmental Management Act (EMA), 2007, (Act No. 7 of 2007) served as the guiding tools for the EIA and EMP process. The environmental assessment steps undertaken and way forward are summarized as follows:

- Preparation of the Background Information Document (BID) (*Carried out in August 2022*).
- Preparation of the Public Notice published in the local newspapers, for two consecutive weeks, as part of required public consultation process (*Carried out in August (3-18) 2022*).
- Published public notices in the *Confidante Newspaper (5-11 August and 12-18 August 2022)* and *Windhoek Observer (3 August to 18 August 2022)* daily.
- Site notices were placed around the Daure Daman Traditional Authority, Community Hall in Okombahe, where the public meeting took place. Some posters were placed

around Uis settlement and Omaruru town (Community library and Municipality Office). Erecting site notices around the EPL area was not going to serve its purpose as the area is isolated from people.

- All issues raised were incorporated into the assessment report. These submissions were tabled and responded to as indicated in the public participation section of the assessment report.
- Online registration of the project with MEFT through an online Portal (www.eia.met.gov.na).
- Stakeholder register made available to I&APs to register their comments and inputs via email for inclusion in the EIA and EMP Reports (*21 June 2022 to 17 July 2022*)
- Public meeting was held on *9th July 2022* at Daure Daman Traditional Authority, Community Hall in Okombahe as part of mining claims 70515 & 70516, located within EPL8841.
- EIA and EMP reports (hard copies) to be submitted to the Environmental Commissioner in MEFT through the MME (Competent Authority) and submission of digital copies with MEFT (*to be carried out in September 2022*).
- Additional 14 days to be afforded to the interested and affected parties to submit comments / inputs on the proposed project activities directly to the Environmental Commissioner after submission of the application for ECC to the Environmental Commissioner, on the MEFT digital Portal: www.eia.met.gov.na. (*to be carried out in September- October 2022*).
- Wait for the Decisions from the Environmental Commissioner (*from October 2022*).

1.9 Environmental assessment approach and methodology

Environmental assessment process in Namibia is governed by the Environmental Impact Assessment (EIA) Regulations No. 30 of 2012 gazetted under the Environmental Management Act, (EMA), 2007, (Act No. 7 of 2007) and in line with the provisions of the Cabinet approved Environmental Assessment Policy for Sustainable Development and Environmental

Conservation of 1995. This report has taken into consideration all the requirements for preparation of all the supporting documents and application for an Environmental Clearance Certificate and lodgments of such application to the Environmental Commissioner (EC), Department of Environmental Affairs (DEA) in the Ministry of Environment, Forestry and Tourism (MEFT). The steps undertaken during the Assessment Phase are summarized below.

1.9.1 Project initiation and screening

The project was registered on the online ECC portal (eia.met.gov.na) in order to provide notification of the commencement of the EIA process and to obtain clarity on the process to be followed.

1.9.2 Initial assessment public participation process

The objective of the public assessment process was to ensure that interested and affected parties (I&APs) were notified about the proposed project, given a reasonable opportunity to register on the project database and to provide initial comments. Steps that were undertaken during this phase are summarized below:

I&AP identification:

A project specific I&AP stakeholder database was developed, this database has been maintained and updated as and when required. A copy of the I&AP database is attached in Appendix A. The farmer's contact details were obtained during site visit, contact details of other interested and affected parties that were provided by the proponent. Furthermore, I&APs were added to the database based on responses to the advertisements and notification letters.

Notification letter and Background Information Document (BID):

BIDs were distributed via email to relevant authorities and stakeholder on the I&APs database. A notification letter was also distributed for review and comment for a period of 3 weeks after commencement of the project. The purpose of the BID was to inform I&APs about the proposed project, the assessment process being followed. Attached to the BID was a registration and

response form, which provided I&APs with an opportunity to submit their names, contact details and comments on the project. A copy of the BID is attached in Appendix D.

1.9.3 Compilation and Review of Draft Assessment Report (DSR)

The Draft assessment report (DSR) was prepared in compliance with Section 8 of the EIA Regulations of 2012 and incorporated with comments received during the initial Public Participation Process. The DSR will be distributed for a 14-day review and comment period.

1.9.4 Final Assessment Report and Completion of the Assessment Phase

The Final Assessment Report (FSR) summarizes the following: the legal and policy framework; approach to the EIA and process methodology; the project's need and desirability; proposed project activities; key characteristics of the receiving environment; and key issues of concern that will be further investigated and assessed in the next phase of the EIA. The FSR complies with Section 8 of the EIA Regulations 2012. All written submissions received during the DSR review and comment period will be collated and responded to. The FSR will be submitted to the competent authority. In terms of Section 32 of the Environmental Management Act, 2007 (No. 7 of 2007), the competent authority is then required to make a recommendation on the acceptance or rejection of the report to Ministry of Environment, Forestry and Tourism (MEFT): Department of Environmental Affairs (DEA), who will make the final decision.

1.10 List of Specialist Studies Undertaken

Section 9(a) of the Environmental Regulations of 2012 requires a disclosure of all the tasks to be undertaken as part of the assessment process, including any specialist to be included if necessary. A specialist study on archaeology was undertaken by a qualified archaeologist. As part of the study, a foot survey was undertaken to identify any potential artefacts or human remains which may occur in the area. Archaeological specialist study, together with the consent letter from the Heritage Council of Namibia, is annexed to this report.

1.11 Assumptions and limitations of the assessment study

This EIA report is based on currently available information and, as a result, the following assumptions and limitations apply:

- The report is based on project information provided by the proponent.
- The proposed activities as well as all the plans, maps, line boundary / coordinates, and appropriate data sets received from the proponent, project partners, regulators and competent authorities are assumed to be current and valid at the time of conducting the studies and preparation of this report.
- The impact assessment outcomes, mitigation measures and recommendations to be provided in the EIA/ Scoping and EMP reports are valid for the lifecycle of the proposed project.
- Descriptions of the natural and social environments are based on fieldwork, relevant specialist studies and available literature, where baseline information and impact assessment guidelines were insufficient or unavailable, a precautionary principle approach has been implemented

2. Regulatory framework

National Legislation

This chapter outlines the regulatory framework applicable to the proposed project. All mineral rights in Namibia are regulated by the Ministry of Mines and Energy (MME) whereas environmental regulations are regulated by the Ministry of Environment, Forestry and Tourism (MEFT). Below is a list of applicable legislation and the relevance to the project.

2.1 Constitution of the Republic of Namibia, 1990

The Constitution is the supreme law in Namibia, providing for the establishment of the main organs of state as well as guaranteeing various fundamental rights and freedoms. Provisions relating to the environment are contained in Chapter 11, article 95, which is entitled “promotion of the Welfare of the People”. This article states that the Republic of Namibia shall – “actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for all Namibians, both present and future.

Relevance to the Project: The project will enable the full execution of right to practice any profession, or carry on any occupation, trade, or business by availing necessary provisions such as practicing any profession, or carry on any occupation, trade or business in the country. Through implementation of the environmental management plan, the proposed exploration activities will ensure conformity to the constitution in terms of environmental management and sustainability.

2.2 Environmental Management Act of 2007

Line Ministry: Ministry of Environment, Forestry and Tourism

The regulations that accompany this act lists several activities that may not be undertaken without an environmental clearance certificate issued in terms of the Act. This Act and its

regulations should inform and guide this EIA process. The project proponent will ensure that all provisions of the mineral exploration EMP are implemented and regular environmental compliance auditing conducted by independent consultants. The act further states that clearance certificate be issued before the commencement of such activities and remains in force for three (3) years. If a person wishes to continue with activities covered by the act, he or she must apply for a new certificate in terms of the Environmental Management Act.

2.3 The Minerals Prospecting and Mining Act of 1992

Line Ministry: Ministry of Mines and Energy

The Minerals Prospecting and Mining Act No.33 of 1992 approves and regulates mineral rights in relation to exploration, reconnaissance, prospecting, small scale mining, mineral exploration, large-scale mining and transfers of mineral licences. The proponent has to acquire an Exclusive Prospecting Licence from MME prior to mineral prospecting.

2.4 Water Resources Management Act of 2013

Line Ministry: Ministry of Agriculture, Water and Land Reform

The act provides for the management, protection, development, usage and conservation of water resources; to provide for the regulation and monitoring of water resources and to provide for incidental matters.

2.5 Nature conservation ordinance, ordinance No. 4 of 1975

Line Ministry: Ministry of Environment, Forestry and Tourism

The Nature Ordinance 4 of 1975 covers game parks and nature reserves, the hunting and protection of wild animals (including reptiles and wild birds), problem animals, fish, and the protection of indigenous plants. It also establishes a nature conservation inland fisheries, keeping game and other wild animals in capturing. In addition, the ordinance also regulates game dealers, game skins, protected plants, birds kept in cages, trophy hunting of hunt-able game, hunting at night, export of game and game meat, sea birds, private game parks, nature reserves, regulations of wildlife associations and registers for coyote getters.

2.6 National Heritage Act, 2004 (Act No. 27 of 2004)

Line Ministry/Body: National Heritage Council

The National Heritage Act provides for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.

Relevance to the project: There might be potential for heritage objects to be found on site, therefore the stipulations in the Act have been taken into consideration and are incorporated into the EMP. Section 55 compels exploration companies to report any archaeological findings to the National Heritage Council after which a permit needs to be issued before the find can be disturbed. In cases where heritage sites are discovered the “chance find procedure” will be used

2.7 Petroleum Products and Energy Act No. 13 of 1990

Line Ministry/Body: Ministry of Mines and Energy

The act regulates the importation and usage of petroleum products. The act reads as “To provide measures for the saving of petroleum products and an economy in the cost of the distribution thereof, and for the maintenance of a price thereof; for control of the furnishing of certain information regarding petroleum products; and for the rendering of services of a particular kind, or services of a particular standard; in connection with motor vehicles; for the establishment of the National Energy Fund and for the utilization thereof; for the establishment of the National Energy Council and the functions thereof; for the imposition of levies on fuel; and to provide for matters incidental thereof”.

2.8 Forest Act, No. 12 of 2001

Line Ministry/Body: Ministry of Agriculture, Water and Land Reform

The act regulates the cutting down of trees and reads as follows “To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of forests and forest produce; to provide for the protection of the environment and control and management of forest trees; to repeal the

preservation of Bees and Honey proclamation 1923, preservation of Trees and Forests Ordinance, 1952 and the Forest Act, 1968; and to deal with incidental matters”.

The constitution defines the function of the Ombudsman and commits the government to sustainable utilization of Namibia’s natural resources for the benefit of all Namibians and describes the duty to investigate complaints concerning the over-utilization of living natural resources for the benefit of all Namibians and describes the duties to investigate complaints concerning the over-utilization of living natural resources, the irrational exploitation of non-renewable resources, the degradation and the destruction of ecosystem and failure to protect the beauty and character of Namibia. Article 95 states that *“the state shall actively promote and maintain the welfare of the people by adopting; inter-alia policies aimed at maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians both present and future”*.

2.9 Atmospheric Pollution Prevention Ordinance 11 of 1976

Line Ministry/Body: Ministry of Health and Social Services

This ordinance provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, with the exception of East Caprivi, is proclaimed as a controlled area for the purposes of section 4(1) (a) of the ordinance.

2.10 Hazardous Substance Ordinance, No. 14 of 1974

Line Ministry/Body: Ministry of Safety and Security

The ordinance provides for the control of toxic substances. It covers manufacture, sale, use, disposal and dumping as well as import and export. Although the environmental aspects are not explicitly stated, the ordinance provides for the importing, storage and handling.

2.11 Namibian Water Corporation (Act 12 of 1997)

Line Ministry/Body: Namibian Water Corporation

The act caters for water rehabilitation of prospecting and mining areas, environmental impact assessments and for minimizing or preventing pollution.

2.12 Public and Environmental Health Act, 2015

Line Ministry/Body: Ministry of Health and Social Services provide a framework for a structured uniform public and environmental health system in Namibia; and to provide for incidental matters.

2.13 Agricultural (Commercial) Land Reform Act 6 of 1995

Line Ministry/Body: Ministry of Lands and Resettlement

To provide for the acquisition of agricultural land by the State for the purposes of land reform and for the allocation of such land to Namibian citizens who do not own or otherwise have the use of any or of adequate agricultural land, and foremost to those Namibian citizens who have been socially, economically or educationally disadvantaged by past discriminatory laws or practices; to vest in the State a preferment right to purchase agricultural land for the purposes of the Act; to provide for the compulsory acquisition of certain agricultural land by the State for the purposes of the Act; to regulate the acquisition of agricultural land by foreign nationals; to establish a Lands Tribunal and determine its jurisdiction; and to provide for matters connected therewith.

2.14 Labour Act No.11of2007

Line Ministry/Body: Ministry of Labour, industrial Relation and employment creations. This act details the occupational health & safety, minimum wages, fundamental rights as well as the basic conditions of employment to be followed.

Relevance to the Project: The proposed project will comply with stringent health and safety policies, including the compulsory use of specific PPE in designated areas to ensure adequate protection against health and safety risks. Proper storage and labeling of hazardous substances are required. The project will ensure employees in charge of and working with hazardous substances needs to be aware of the specific hazardous substances in order not to compromise worker and environmental safety.

Recommendations on Permitting Requirements

It is hereby recommended that the Proponent shall follow the provisions of all relevant national legislations throughout the proposed project lifecycle and must obtain the following permits/authorizations as may be applicable / required as the proposed project develops:

- Valid Exclusive Prospecting License as may be applicable from Department of Mines in the Ministry of Mines and Energy (MME).
- Valid ECC from the Department of Environmental Affairs in the Ministry of Environment, Forestry and Tourism (MEFT).
- The Proponent shall apply for a fresh water abstraction and waste water discharge permits from the Department of Water Affairs (DWA) in the MAWLR before drilling a water borehole and discharge wastewater into the environment respectively, and.
- All other permits as may be become applicable during the proposed exploration operations.

3. Project Description

3.1 Project need and desirability

Exploration forms part of the backbone of the mining industry as it is the only process through which the mineral potential of a given area can be realized and it's through exploration activities that the much sought-after ore deposits of economic potential can be discovered. In the event that the exploration project is successful, and mineral resource with commercially viable mineral concentrations can be defined, exploration operations can contribute greatly to socio-economic development of the Region. A mining project which is the end result of the proposed exploration project may assist in helping Namibia attain some of the goals set out in National Development Plans such as the Fifth National Development Plan (NDP5) and the Harambee Prosperity Plan (HPP). Mining, Namibia's leading economic sector, accounts for roughly 10% of Namibia's GDP every year, and thus the largest contributor to the Namibian economy through royalty and taxes.

3.2 Project alternatives

One of the objectives of an EIA is to investigate alternatives to the proposed project. Alternatives should include consideration of all possible means by which the purpose and need of the proposed activity could be accomplished. The no-go alternative must also in all cases be included in the assessment phase as the baseline against which the impacts of the other alternatives are assessed

3.2.1 Location

The purpose of mineral exploration/ prospecting is the discovery and acquisition of new mineral deposit amenable to economic extractive operations now or in future. A mineral deposit is any occurrence of a valuable commodity or mineral that is of sufficient size and grade (concentration) that has potential for economic development under past, present or future favorable conditions. Prospecting activities usually begin in an office, where all existing data on

the bedrock and its chemical and physical properties are reviewed to determine whether the area is favorable to certain types of mineralization and ore. The general principle of mineral exploration works by extracting pieces of geological information from several places, and extrapolating this over the larger area to develop a geological picture. Different types of rock concentrate different metals, so that if the proponent is looking for particular mineral commodities, they look for rock types that are favorable to such deposits. In this case, the proponent is interested in lithium. The target rock units are pegmatites located in the Cape-Cross-UIS pegmatite belt, well known to host minerals of economic value such as lithium, tin, tantalum, tungsten and REE.

3.2.2 Mining Method Alternatives

Topography and the physical characteristics of the deposit strongly influence the choice of mining method. Pegmatite bodies of the study area show structural control, such as being emplaced along faults, lithologic boundaries, and plutonic contacts at shallow depths. Therefore, the proposal is to conduct open pit mining and extend to underground mining in the future when surface orebody gets depleted.

3.2.3 Substitutes/ mineral use alternatives

Substitution for lithium compounds is possible in batteries, ceramics, greases, and manufactured glass. Examples are calcium, magnesium, mercury, and zinc as anode material in primary batteries; calcium and aluminum soaps as substitutes for stearates in greases; and sodic and potassic fluxes in ceramics and glass manufacture.

3.3 No-Go Alternatives

A comparative assessment of this option requires a comparison between the alternative of proceeding with the proposed project, with that of not proceeding with the proposed project.

The environmental benefits will include no negative environmental impact on the receiving environment. However, it is important to understand that even if the proposed project does not take place, to which the likely negative environmental impacts is likely to be low and localized, the current and other future land uses such as agriculture will still have some negative impacts on the receiving environment. The likely negative environmental impacts of other current and future land uses may still happen in the absence of the proposed mining activities.

No-go alternative will mean that the current land activities such as farming and important vegetation species will not be disturbed, that is, there will not be disturbance of the flora and fauna. No-go alternative will result in the non-mining of minerals and bring benefications to the receiving environment. However, the no-go alternative is not considered since it will lead to negative socio-economic impacts.

Furthermore, proceeding with the proposed project will result in proponent being able to mine the ore body, and in so doing:

- Provide employment opportunities for Namibians;
- Contribute to Namibia's economy and GDP;
- Provide an additional tax base for government revenue, and
- Enable the proponent to generate an operating income and earn revenue.

3.4 Infrastructure and Services

3.4.1 Site access/roads

The project area (EPL 8841) is accessible 35 km southwest directly via the C35 road, connecting Henties Bay to Uis Settlement. The area is located in western central Namibia in Erongo Region, Dâures Constituency. It covers state land, while its northeastern portion is covered in Okombahe reserve. The area is gazetted as the Tsiseb (Hada-Huigu) conservancy by the Ministry of

Environment, Forestry and Tourism in 2001, it is sandwiched by the Dorob national park on the left and #Gaingu Conservancy on the right. From Windhoek, the capital city of Namibia the project area is accessed from via the sealed (tarred) B1 highway north to Okahandja, the sealed (tarred) B2 highway from Okahandja westwards to Wilhelmstal, and the sealed (tarred) C36 main road northwestwards to Omaruru. From Omaruru westwards to Uis settlement, the C36 is a gravel road. The distance by road from Windhoek to Uis is approximately 330 km. From Walvis Bay, access is via the B2 sealed (tarred) highway northwards to Swakopmund, the main C34 salt road north along the coast to Henties Bay, and then the gravel main M76/C35 road northeast to the village of Uis.

The area under exploration is accessible by 4x4 /2x2 pick-up vehicle by the existing tracks and otherwise, the sensitive section of the project area will only be accessed by foot to ensure minimum impacts on the receiving environment. Prior to project commencing access agreements would need to be negotiated and entered between the proponent and the responsible landowner. Furthermore, location of off-road tracks would be constructed in consultation with the responsible landowner(s).

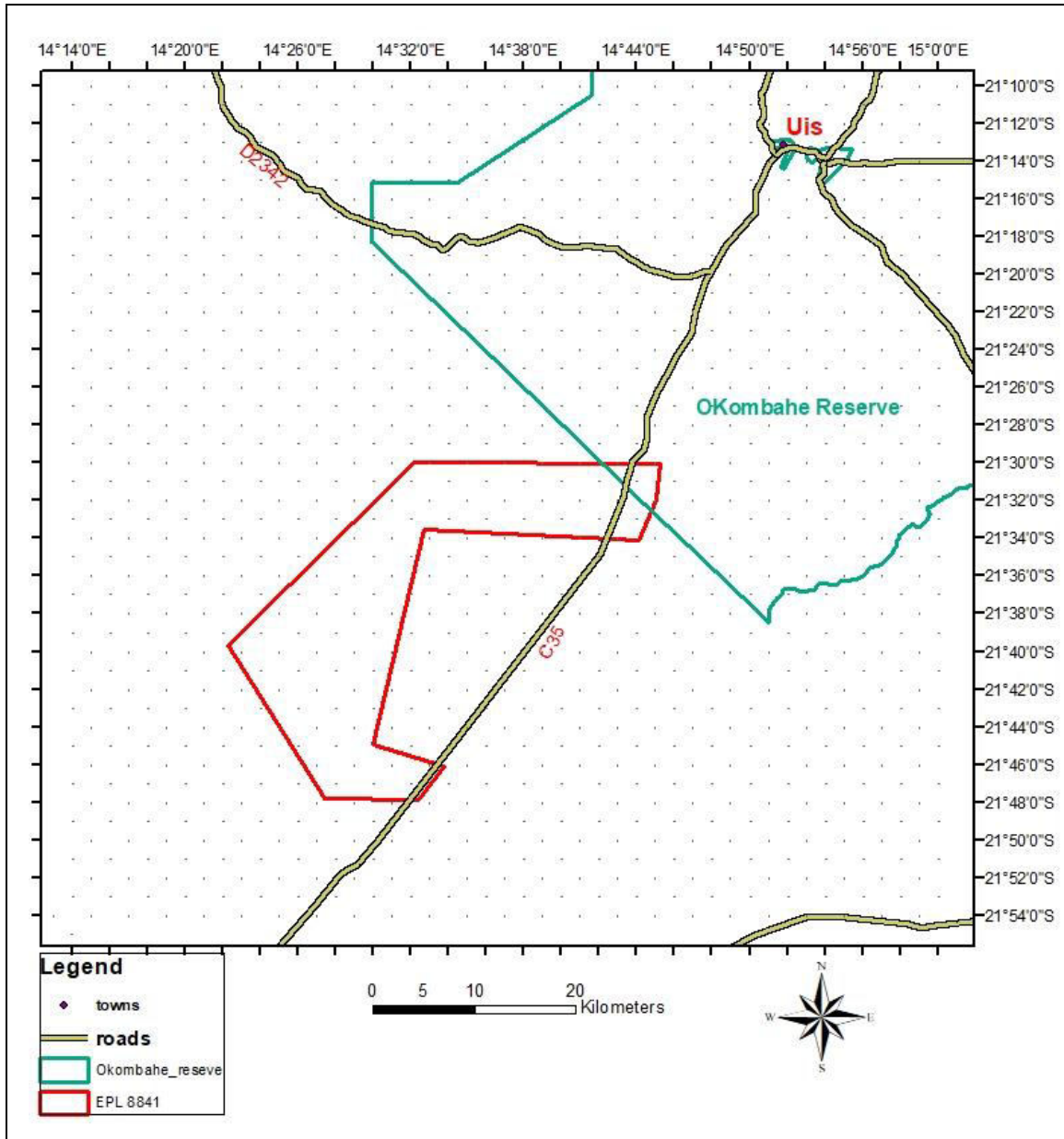


Fig. 5. Location of Exclusive Prospecting License (EPL8841) in Okombahe Reserve area, accessible from Uis Settlement by C35 gravel road.

3.4.2 Water supply

Water will be required mainly for domestic and exploration activities. Exploration purposes water is required for diamond core drilling and dust suppression. Drilling works water requirement will potentially be around 4000-6000 litres (L) per day. It is anticipated that water will be sourced from Okombahe Bulk Water Supply Scheme. Okombahe Bulk Water Supply

Scheme is a groundwater scheme managed by Namibia Water Corporation Ltd (NamWater) supplying potable water to the Erongo Regional Council, a police station and two schools. Alternatively, water can be supplied from Omaruru Municipality Bulk Water Supply Scheme, supplied by the Omaruru Municipality, one of the few Municipalities that operates and manages their own bulk water supply scheme. This scheme supplies water from two well fields, four boreholes in the immediate vicinity of Omaruru and from three boreholes of the Kranzberg scheme east of Omaruru town.



Fig.6. Similar containers to be used for portable water during the exploration phase.

During mining operation phase, water will be required for drilling, crushing, mineral beneficiation and for dust suppression. Given the low groundwater potential in the project area, the aquifers may not be able to sustainably supply the project. However, about 12 km South East of the project area, there is a porous aquifer of moderate production from which groundwater can be abstracted. Boreholes can be drilled with permission from the Department of Water Affairs in the Ministry of Agriculture, Water and Land Reform (MAWLR) as well as from the responsible landowner(s). Adoption measures will be adopted in order for processing water to be recycled back into the system.

3.4.2 Power supply

Basic energy supply requirement supply will be provided by generators and solar as may be required for exploration purposes as well as domestic purposes by the exploration team. As of December 2013, Uis settlement was connected to the Namibia's national power transmission grid. Erongo Regional Electricity Distributer Company (Pty) Ltd (Erongo RED), a NamPower legal entity, is tasked with the supply and distribution of electricity within the Dâures constituency where the project is located. Once the power demand increases beyond generators and solar, then Erongo RED will become the main power supplier for the mining project.

3.4.3 Accommodation, transportation and infrastructure

Where practical and possible, it is strictly recommended that for unskilled labour, local community members are employed. It is suggested that project staff members will be based in Uis settlement during the exploration programme. Staff transports arrangements from Uis to exploration sites will be provided by the proponent. Another available option would be to setting up accommodation camp on site in consultation with the Conservancy Management Committee and most preferably within an appropriately zonation area.

During the whole prospecting period, it is anticipated that about 20 persons will be employed; furthermore, temporary employment will potentially be available for graduate Geologists, geo-technicians and semi/unskilled personnel for the purpose of geological mapping and geochemical surveys. Drilling will be executed by an appointed Qualified and registered Namibian drilling contractor(s), and it is expected that they will have their own workforce (drilling crew). A drilling team will consist of a drill operator and usually three to four support staff, including drivers, one or two geologists, geo-technicians and 2 technical assistants and laborers. All employees will undergo a safety induction, first aid training course and wildlife awareness program. The Labour Act of 2007 will always be adhered to.

3.4.4 Fire fighting and safety services

Portable fire-extinguishers will be fitted on all vehicles as well as in the mobile containers where possible. Provision will be made for two-way radios to enable the drill rig operators and the onsite staff to communicate effectively. Portable fire-extinguishers will be fitted on all vehicles as well as in the mobile containers where possible. Provision will be made for two-way radios to enable the drill rig operators and the onsite staff to communicate effectively.

3.4.5 Waste dumps and waste management

During the exploration activities, domestic waste (non-hazardous) will be produced in small volumes. Domestic waste will be stored in a manner that there can be no contamination to the environment and shall be disposed of correctly. Therefore, sufficient waste bins (containers) will be made available at both exploration sites and campsite for waste storage. The bins will be emptied into the main onsite container for disposal at the nearest Municipality solid waste site, it should however be noted that a waste disposal agreement between the proponent and the Municipality has to be reached before.

All vehicles, machinery and fuel consuming equipment will be provided with drip trays to capture potential fuel spills and waste oils. Potential hydrocarbon spills from vehicles, heavy equipment and drilling equipment might lead to soil contamination and needs to be treated as a hazardous waste if not bio-remediated. Hazardous waste will be carefully stored in a standardized container until such a time that it can be disposed of at the nearest approved hazardous waste management facility or removal by an external hazardous handling & management contractor.

3.4.6 Sanitation and ablution facilities

Existing ablution facilities will be used by personnel if available and with consent from the landowner. Should activities be conducted in remote locations, portable chemical toilets and

associated ablution facilities will be provided for use by personnel. Due to health and safety concerns, personnel may not relieve themselves in the surrounding bush. Wastewater will be transported offsite to the treatment facility either by the proponent or a designated/appointed external waste management contractor.



Fig. 7. Toilet facilities similar to these to be made available on site.

3.4.7 Materials, Equipment and Vehicles

The input required for the exploration program in terms of vehicles, machines and equipment but not limited to the following. These will be kept at a demarcated storage area on site that will be established within the EPLs. These include:

- Two to four 4X4 pickup trucks,
- Heavy trucks for equipment transportation,
- One to two water tankers and storage tanks,
- An excavator / front-end loader to scoop up sandy overburden,
- Dozers (to clear vegetation along planned drilling site access roads, where vegetation is encountered and a hindrance)
- Drill rig and machines,
- Drilling fluids and biodegradable drilling mud additives stored in manufacturers approved containers

- Air compressors,
- Drill samples storage containers / trays,
- One or two diesel generators for power supply, and
- Two-way radios for constant communication on site.

3.5 Potential Land Use Conflicts

The proponent provisionally acquired mineral rights on Exclusive Prospecting License (EPL8841), for base & rare metals, dimension stone, industrial minerals, nuclear fuels, non-nuclear fuels, precious metals, precious stones, semi precious stones from the Ministry of Mines and Energy (MME). Surface rights in the Project area belong to the Government of Namibia and the proponent does not own or hold any title to the surface rights of any land in the area. Therefore, to gain full access to the project area, it is strictly recommended that the proponent negotiates and signs a Surface Use Agreement detailing aspects of conduct and benefit distribution with all key stakeholder i.e. Traditional Authority, Conservancy and other Operators or support institutions e.g. NGOs / CSOs). There are no other significant royalties, payments or agreements or risks that may affect access, title, or the right or ability to execute the proposed mining and exploration work on the project. Considering the current land use practices (agriculture, mining and tourism) it's likely that the exploration project in the general area can still co-exist with the existing and potential future land use options of the general area. However, much more detail assessment of any likely visual and other socioeconomic impacts will need to be undertaken as part of the EIA.

4. Description of the proposed exploration and mining project

Description of activities to be undertaken

(i) Mineral exploration/prospecting

Mineral exploration is a complete sequence of activities. It ranges between searching for a new mineral prospect (reconnaissance) and evaluation of the property for economic mining (feasibility study). It also includes augmentation of additional ore reserves and resources in the mine and total mining district. Mineral rights valid under Exclusive Prospecting License (EPL8841) base & rare metals, dimension stone, industrial minerals, nuclear fuels, non-nuclear fuels, precious metals, precious stones, semi precious stones. The proposed activity will involve will entail both non-invasive and invasive exploration methods as described below. Non-invasive exploration methods usually include remote sensing, geological field mapping, ground geophysical survey, surface sampling, etc. whereas invasive exploration methods include more destructive methods of exploration such as reverse circulation or diamond drilling and pitting/trenching. Non-invasive exploration activities will be undertaken first in order to define the need for more invasive activities. Should the results from the non-invasive activities be positive the detailed site-specific drilling, trenching, and sampling will be undertaken. Project exploration stages are described below.

Exploration stages

(a) Prospecting stage

The objective of prospecting is to identify a deposit for further exploration. Estimates of quantities and grades are inferred, based on interpretation of geological, geophysical and geochemical results. This stage of exploration may include geological mapping, sampling, pitting, trenching, drilling, Petrological and Mineralogical Studies, sample analysis and reserve estimation.

Reserve estimation

The reserve shall include both quality (grade) and quantity (tonnes) aspects

- Reserve estimates must be at least in the “possible” category;
- Reserve must be estimated using an appropriate method depending on type and nature of topography and mineral deposits. Recommended methods are provided in Table below;
- The error of the estimated reserve shall not exceed 50 % ;
- The reserve estimate is based on limited geological, geochemical and /or geophysics information and
- The level of geological confidence on the reserve is low.

(b) General Exploration stage

Based on findings and recommendations of prospecting and/or preliminary socio-economic and environmental assessment, general exploration may undertaken. The objective of general exploration is to establish the main geological features of a deposit, giving a reasonable indication of continuity and providing initial estimate of extent, shape, structure, and grade. The degree of accuracy should be sufficient for deciding whether a detailed exploration is warranted. Estimates of quantities and grades are indicated, based on interpretation of geological, geophysical and geochemical results.

Reserve estimation

- Reserve estimation must be at least in “Probable” category;
- The error of the estimated reserve shall not exceed 30 % ;
- The reserve estimate is based on moderate geological, geochemical and /or geophysics information, and
- The level of geological confidence on the reserve is moderate.

(c) Detailed exploration stage

Detailed exploration involves clear three-dimensional delineation of a known deposit extent, shape, structure, and other characteristics of the deposit with high degree of accuracy. A decision whether to conduct a feasibility study can be made from information provided by detailed exploration. Estimates of quantities and grades are measured, based on interpretation of geological, geophysical and geochemical results. The work items and standards for detailed exploration as follows:

Reserve estimation

- Reserve estimation must be at least in “Proven” category;
- The error of the estimated reserve shall not exceed 20 % ;
- The reserve estimate is based on detailed geological, geochemical and /or geophysics information, and
- The level of geological confidence on the reserve is high.

Exploration programme

Exploration programme activities will include:

- Geological mapping - Involves visual assessment of outcropping rocks: No environmental impact, no activity footprint to be left behind.
- Ground geophysical surveys—Handheld geophysical equipment or drones are utilized to collect data from subsurface rocks. This is achieved through traversing lithological units of interest: this process does not leave behind any environmental impact and activity footprint.
- Geochemical sampling –A small holes of roughly a few centimeters deep are dug from which sample/s are collected and the hole is then covered after sampling leaving no activity footprint left behind.
- Trenching—A trench is a ground excavation that generally deeper than its width and narrower than its length. Trenching is mainly for purposes of the orientation of the

targeted lithology and mineralization as well as sampling. Impact is localized and the trenches are covered after sampling leaving to no activity footprint.

- Pitting - excavation or diggings of areas are done to obtain a representative bulk sample of the mineralization as well as getting a 3D view of the mineralization. Impact is also localized and the trenches are covered after sampling leaving to no activity foot print.
- RC and diamond drilling - Holes are drilled and drill samples collected will be used for geotechnical analysis and analysis of elements and minerals. Holes are capped after drilling and the drilling site for each hole is localized and rehabilitated after drilling.

Exploration activities will be performed in four phases within three years of the validity of the exclusive prospecting licence. The initial stages of the exploration program to be implemented by the proponent as assessed in the EIA report will involve:

4.1 Non-invasive exploration methods

4.1.1 Desktop studies

- Evaluation of satellite, topographic, land tenure, accessibility, supporting infrastructures.
- Purchase and analysis of existing government high resolution magnetics and radiometric geophysical as well as government aerial hyper spectral data.
- Data interpretation and delineating of potential targets for field- based activities.
- Purchase and analysis of any geological, geochemical data as well as remote sensing mapping and data analysis.
- Thematic mapping shall be done to delineate various land use zones and patterns to help improve the multiple land use practices and promote coexistence for all the possible land use options on the farms

Initial regional field-based activities

- Regional geochemical sampling and regional geological mapping aimed at identifying possible targeted based on the results on results of the initial desktop studies.
- Laboratory analysis of the samples collected and interpretation of the results and delineating of potential targets for further detailed site-specific exploration activities.

Localized/ site specific field-based activities

- Once more information on target areas is obtained, the proponent may undertake frequent verification/ mapping/ sampling visits/ trenching/ drilling, but this will only be over specific areas of interest and not the entire project area.
- The only parts of the EPL to be physically visited for exploration purposes in most cases are areas of interest and these tends to be a localized involving only small areas where the mineralization occurs.
- Field verifications of targets will only be done with the permission of the landowner, and they will have knowledge of the exploration activities in the area/farm.
- Local geochemical sampling with the aim of verifying the prospectively of the targets delineated during regional field-based activities.
- Local geological mapping aimed at identifying possible targeted based on the results of the desktop studies, regional geological mapping and analysis undertaken.
- Ground geophysical survey.
- Trenching, drilling, pitting, sampling.
- Laboratory analysis of the samples collected and interpretation of the results and delineation of potential targets.

Prefeasibility and feasibility Studies

The project may and can only advance in to mining if resources of economic potential are discovered. If the proposed exploration activities lead to a discovery of a mineral resource of economic potential, prefeasibility and feasibility studies will then be carried out over the local area hosting the mineralization. During the prefeasibility and feasibility studies, a detailed site-specific Environmental Impact Assessment (EIA) study will be carried out and an Environmental Management Plan (EMP) report will be prepared and these will be done in consultation with all interested and affected parties including the landowners. The process will involve the following:

- Detailed land surveys and detailed geological mapping.
- Detailed drilling and bulk sampling and testing for ore reserve calculations.
- Geotechnical studies for mine design.
- Mine planning and designs inclusive of all supporting infrastructures (water, power and access) and test mining activities.
- EIA and EMP to support the ECC for mining operations. Preparation of feasibility report and application

Field exploration activities

The proposed exploration activities will run for three years subject to a two year renewal if the prospects are favorable. Activities will include: geophysical surveys, geochemical survey, geological mapping, trenching, drilling and geochemical sampling as well as laboratory analysis aimed discovering mineral resources of economic interest. The proponent plans to implement these activities as soon as the clearance certificate has been issued. Once the deposit proves to be economically feasible, conventional small scale open pit mine development will proceed.

Geological mapping

Geological mapping involves surficial traversing of lithological units to gather information on type outcropping lithological units, their orientations, taking coordinates of their contacts as recording of any feasible mineralization for production of localized maps. This process is non-invasive environmentally wise and leaves no footprint behind.

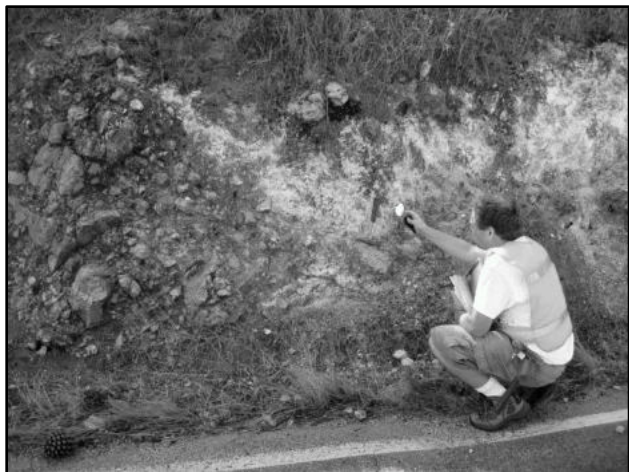


Fig. 8. Geological mapping exercise underway (an environmentally non-invasive activity)

4.1.2 Geophysical surveys

Geophysical surveys are by nature non-invasive to the environment and are primarily conducted to give an overview or a geological picture of the subsurface aimed at identifying underground areas that have mineralization potential in a given area. Various sensors are normally used during the surveys that may include radar, resistivity, magnetic, electromagnetic, etc. These surveys will be conducted in search of mainly metals and some industrial minerals using UAVs, air crafts or by means of ground surveys. The ground geophysical surveys are expected to be conducted over localized areas where potential is known to exist. The following sensors are likely to be utilized:

- Radiometric
- Resistivity
- Ground magnetics are conducted using a magnetometer

- Gravity surveys are conducted with the use of a relative gravimeter
- Electro-magnetic techniques



Fig. 9. Geophysical survey being undertaken.

4.2 Invasive exploration methods

4.2.1 Geo-chemical sampling

Geochemical sampling involves the analysis of geological samples at an analytical laboratory. Samples taken during drilling and surveying will be sent away for analysis, specifically to determine the mineral composition and the level of base metals, namely copper and iron, within the samples. Samples are taken during drilling by either the geologists or geological assistants and can be in either rock, soil or drill core form.



Fig. 10. Geochemical sampling sites

4.2.2. Pitting, trenching and excavations

Pitting and trenching involve the mechanical or manual digging of small-scale pits and trenches in order to provide a soil profile. With regard to the activities within EPL8841, pitting will only occur should results come back positive for mineralization. It is anticipated that the average pit may roughly be 5m x 5m and 3m deep. Trenching is similar to pitting, except a trench will show a latitudinal profile across a longer horizontal access, it is designed to follow an ore body across the landscape. The expected average size of a trench maybe up to 500m x 1m and 2m deep. Excavations will involve opening up some parts of the mineral unit to get a closer look of the mineralization over a wide but localized area, which maybe roughly 2m by 2m.



Fig. 11. Trenching site and a schematic illustration of a trenching site.

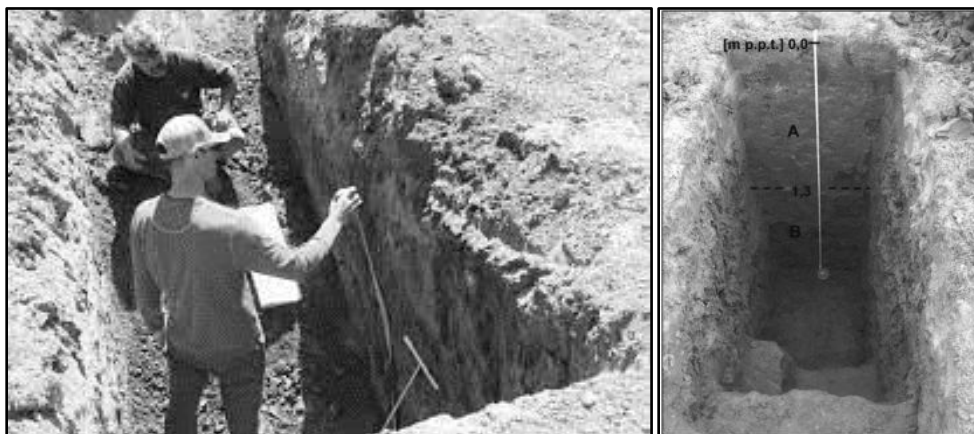


Fig. 12. schematic illustration of pitting sites

4.2.3 Drilling

Exploration drilling is the process which involves collection of subsurface rock samples from drill holes in areas suspected to have potential for mineralization. There are various drilling methods available, for this project the following methods will be utilized: reverse circulation drilling for metal mineralization search and diamond-core drilling for geotechnical assessments of the mineral. The initial total number of meters to be drilled over the project area will depend on the results of the initial exploration activities. Once sampling results are obtained, the areas of

potential are narrowed down and closer spaced holes will be drilled in order to delineate ore-body. A typical drilling area will consist of a drill-rig, an area where the drill core and geological samples can be temporarily stored and a temporary storage area for drill equipment, fuel and lubricants. This area will be cordoned off and off limits to those not partaking in the exploration program.

Reverse Circulation (RC) drilling:

The drilling mechanism is a pneumatic reciprocating piston known as a "hammer" driving a tungsten-steel drill bit. RC drilling utilizes much larger rigs and machinery and depths of up to 500m are routinely achieved. RC drilling ideally produces dry rock chips, as large air compressors dry the rock out ahead of the advancing drill bit.

Diamond-core Drilling:

Diamond core drilling uses an annular diamond-impregnated drill bit attached to the end of hollow drill rods to cut a cylindrical core of solid rock. Holes within the bit allow water to be delivered to the cutting face. This provides three essential functions — lubrication, cooling, and removal of drill cuttings from the hole. Diamond drilling is much slower than reverse circulation (RC) drilling due to the hardness of the ground being drilled. Drilling to a depth 600 meters is common and at these depths, ground is mainly hard rock.

Diamond rigs can also be part of a multi-combination rig. Multi-combination rigs are a dual setup rig capable of operating in either a reverse circulation (RC) and diamond drilling role (though not at the same time). This is a common scenario where exploration drilling is being performed in a very isolated location. The rig is first set up to drill as an RC rig and once the desired meters are drilled, the rig is set up for diamond drilling. This way the deeper meters of the hole can be drilled without moving the rig and waiting for a diamond rig to set up on the pad.



Fig. 13. RC and diamond drilling rigs at work also shown is drill core (activities are very localized with limited footprint).

5. Description of the receiving environment

This chapter provides a description of the receiving environment within the study area. Three components to the environment are: Physical Environment; Biological Environment; and Socio-Economic Environment.

5.1 Socio-Economic Environment

According to the 2011 Namibia Population and Housing Census results, Erongo Region had a population of 150,809 people of which 70,986 were women and 79,823 were men. The region's population was growing at an annual rate of 3.4 percent. Most of the population lived in urban areas (87%) compared to only 13 percent in rural areas. This is due to a large proportion of migration from rural to urban areas in search of job opportunities in towns, particularly among young adults. The main languages spoken at home in the Erongo Region are the Oshiwambo language at 39% Afrikaans language at 20%; Nama/Damara at 19% and Otjiherero language at 10%. Erongo Region comprises of (7) constituencies, namely: Arandis, Dâures, Omaruru, Karibib, Swakopmund, Walvis Bay Rural and Walvis Bay Urban. The project area falls within Dâures Constituency. The total area of Dâures Constituency covers 17 786.6 km² amounting to 28 percent of the total area of Erongo Region. Dâures Constituency is among the least densely populated area in Erongo Region with a population density of approximately 0.6 persons per km² mostly inhabited by Damara and Herero speaking inhabitants. Dâures Constituency population statistics is displayed below.

Table 2: Statistics of Dâures Constituency.

Dâures constituency statistics	
Population	11,350
Male	6, 041
Female	5, 309
Private households	2, 911
Population under 5 years	15 %
Population aged 5 to 14 years	23 %

Population aged 15 to 59	51 %
Population aged 60+ years	11 %
Female : male ratio	100: 114
Female head households	40 %
Male head households	60 %
People with disability	4 %
Employed population	56 %
Unemployed population	44 %
Retired population	63 %
Literacy rate 15 + years, %	82 %
Household income from pension	24 %
Household income from business and non-farming activities	9 %
Household income from farming	24 %
Household income from cash remittance	11 %
Household income from wages and salaries	28 %

5.1.1 Current Land Uses

Livestock farming (cattle, goat and sheep) is the only and major agricultural activities, because the landscape is unsuitable for crop farming due to its aridity and poor soils. Even livestock farming is getting increasingly precarious due to recurrent protracted draughts. Small scale mining for semi-precious stone, sale of handy crafts and employment at tourism facilities also contribute to livelihoods.

5.2 Climatic physiography

Exclusive Prospecting License (EPL8841) is located within a transition zone between a semi-arid climate (Köppen: BSh) and an arid climate (Köppen: BWh) due to its geographic location in the Escarpment between the Namib Desert and the Central Plateau.

5.2.1 Rainfall

Rainfall occurs mainly in summer, from January through to March, with up to 50 mm per month falling during this period. Average annual rainfall is approximately 150mm. Rainfall in Okombahe area is mostly expected from December to March, with March experiencing the highest rainfall days at an average of about 20 days and February with the highest precipitation of about 80 mm. There is little or no rainfall expected around April to October each year. In the past 13 years, the highest rainfall was received in 2011 which was recorded to 410 mm and the second highest rainfall was recorded in last year (2021) at 198mm.

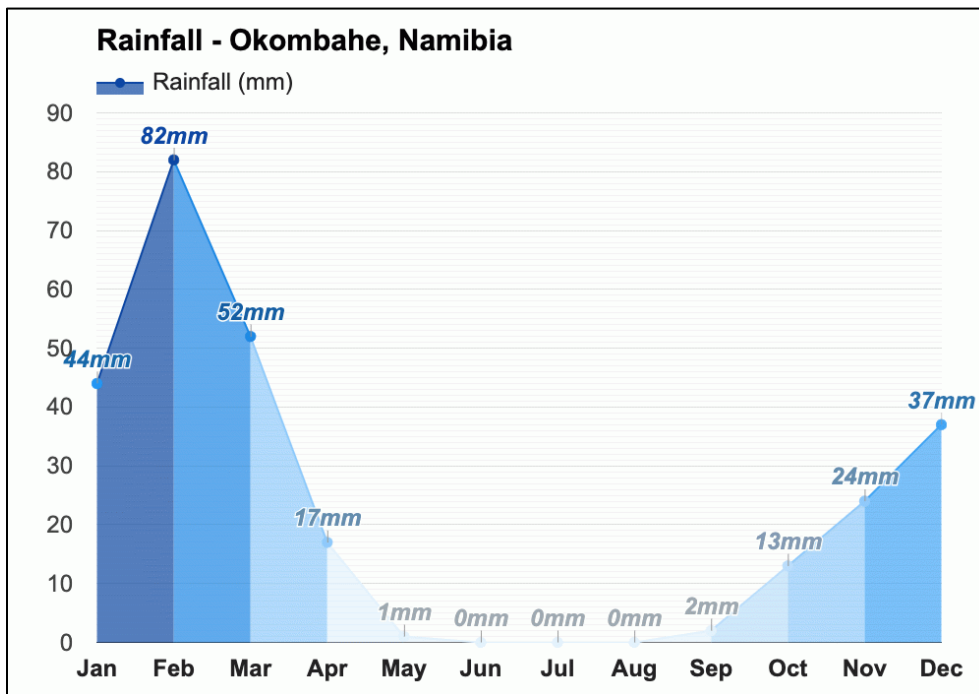


Fig. 14. Monthly average rainfall graph Okombahe and the surrounding areas (Weather Atlas/Okombahe-climate, 2022).

In the past 13 years, the highest rainfall was received in 2011 which was recorded to 410 mm and the second highest rainfall was recorded in last year (2021)

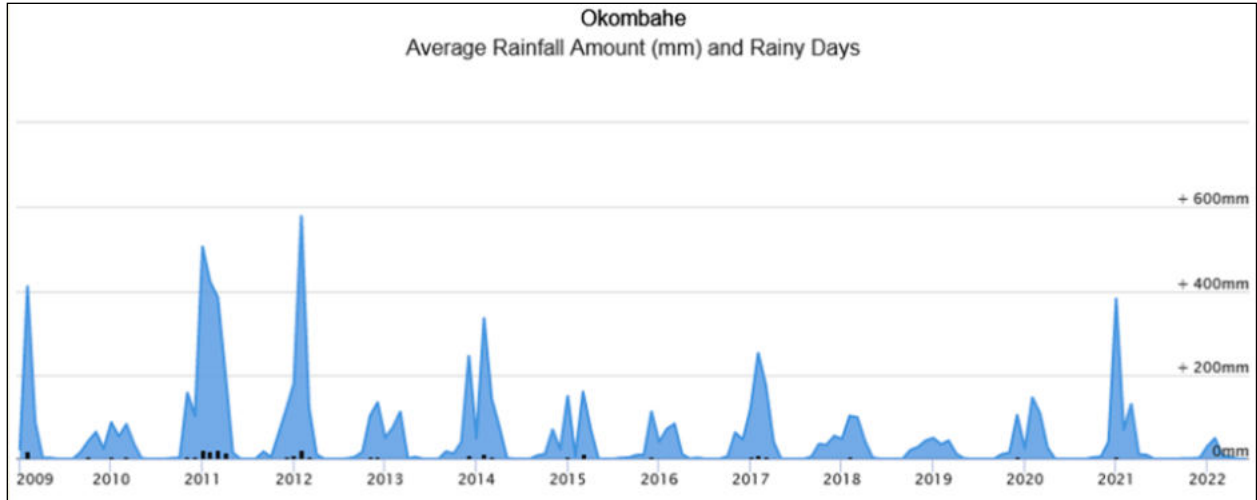


Fig. 15. Annual average rainfall graph Okombahe and the surrounding areas (Weather Atlas/Okombahe-climate, 2022).

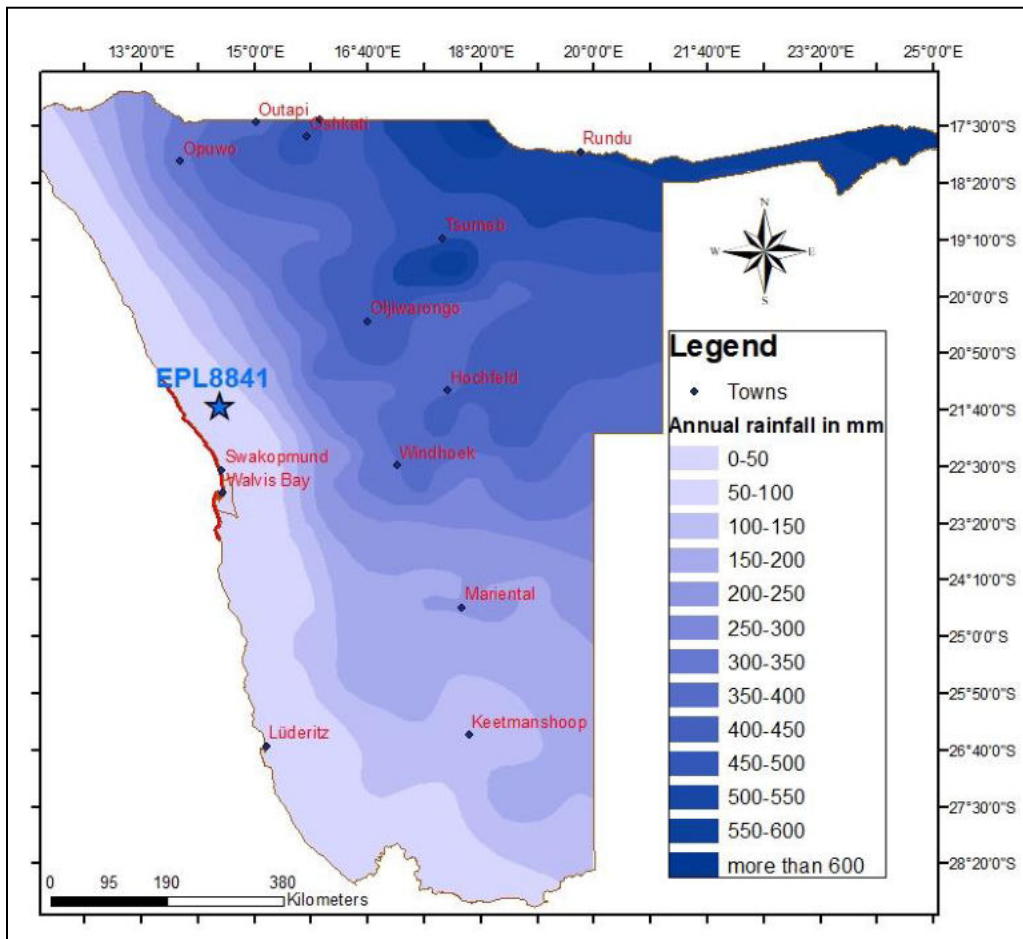


Fig. 16. Average annual rainfall in Namibia (ACACIA, 2002).

5.2.2 Temperature

Days are mostly warm, with very hot days during the summer months, while nights are generally cool. Daytime temperatures range from average highs of 23 °C in the winter period between April and August, and average highs of 30 °C (with temperatures regularly exceeding 40 °C) during the summer (September to March). The average maximum temperature is experienced in October which can go up to 32.4 °C and the lowest in June with an average of 23.6 °C. The average minimum temperature is experienced in July at 9.8 °C and can go as high as 20.1 °C in December. The figure below shows minimum and maximum temperature for a 13 year period, from 2009 to 2022.

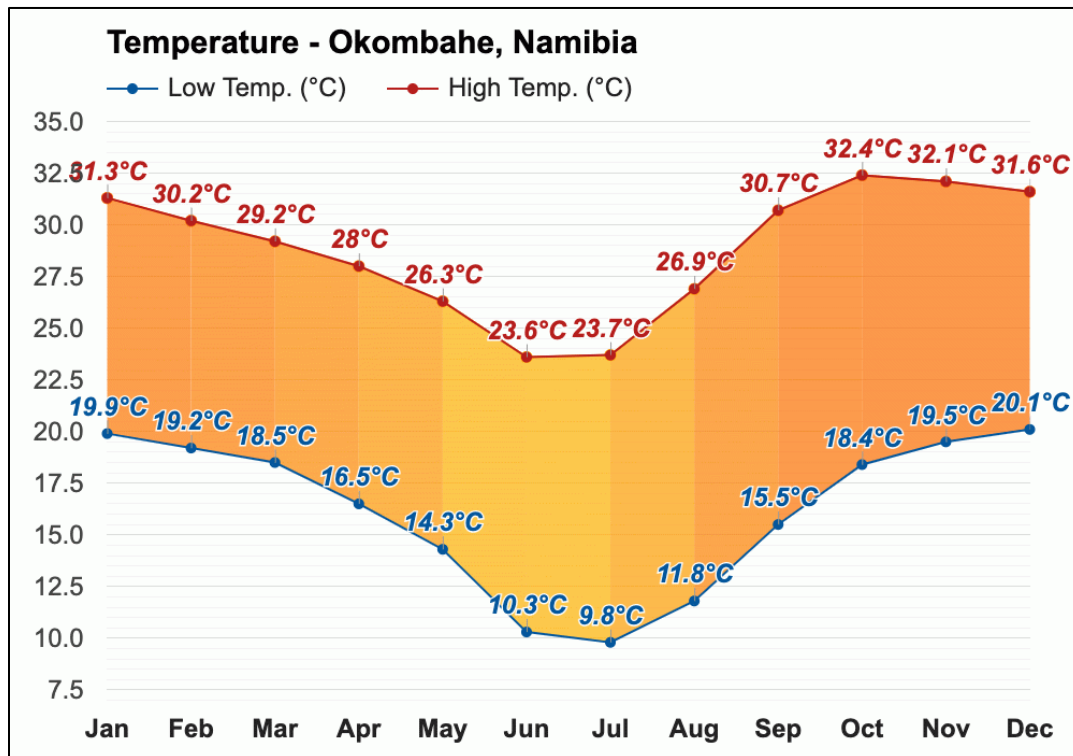


Fig. 17. Monthly average minimum and maximum temperatures of Okombahe that have been extrapolated to Exclusive Prospecting License (EPL8841) (Weather Atlas/Okombahe-climate, 2022).

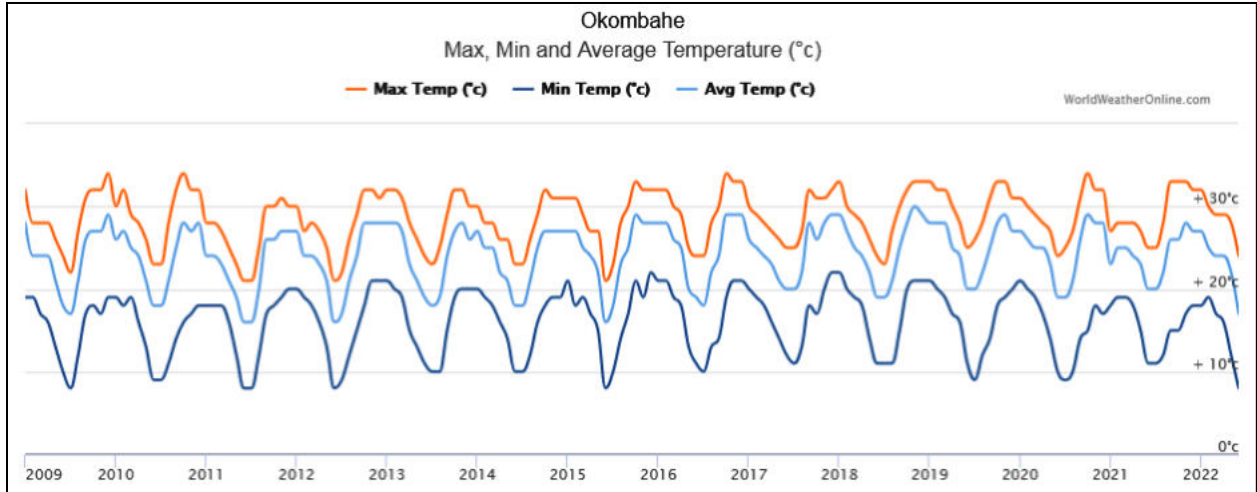


Fig. 18. Annual average minimum and maximum temperatures of Okombahe that have been extrapolated to Exclusive Prospecting License (EPL8841) (Weather Atlas/Okombahe-climate, 2022).

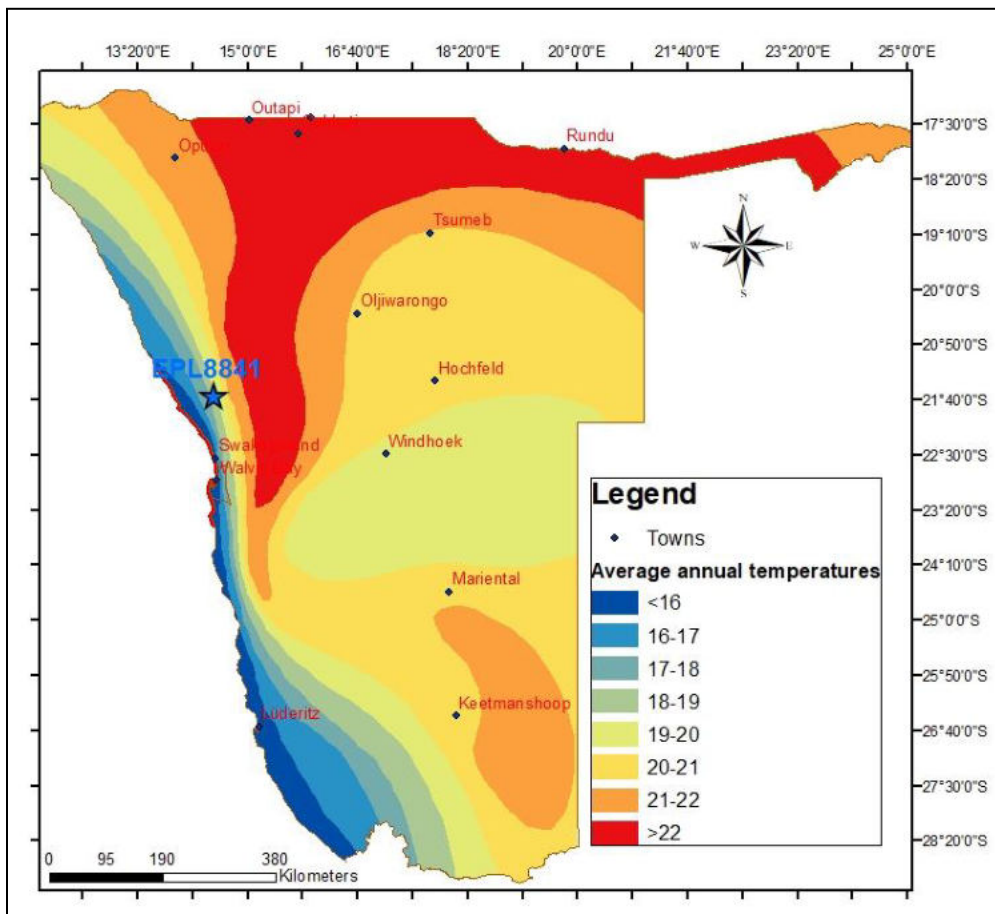


Fig. 19. Average annual temperature in Namibia (ACACIA, 2002).

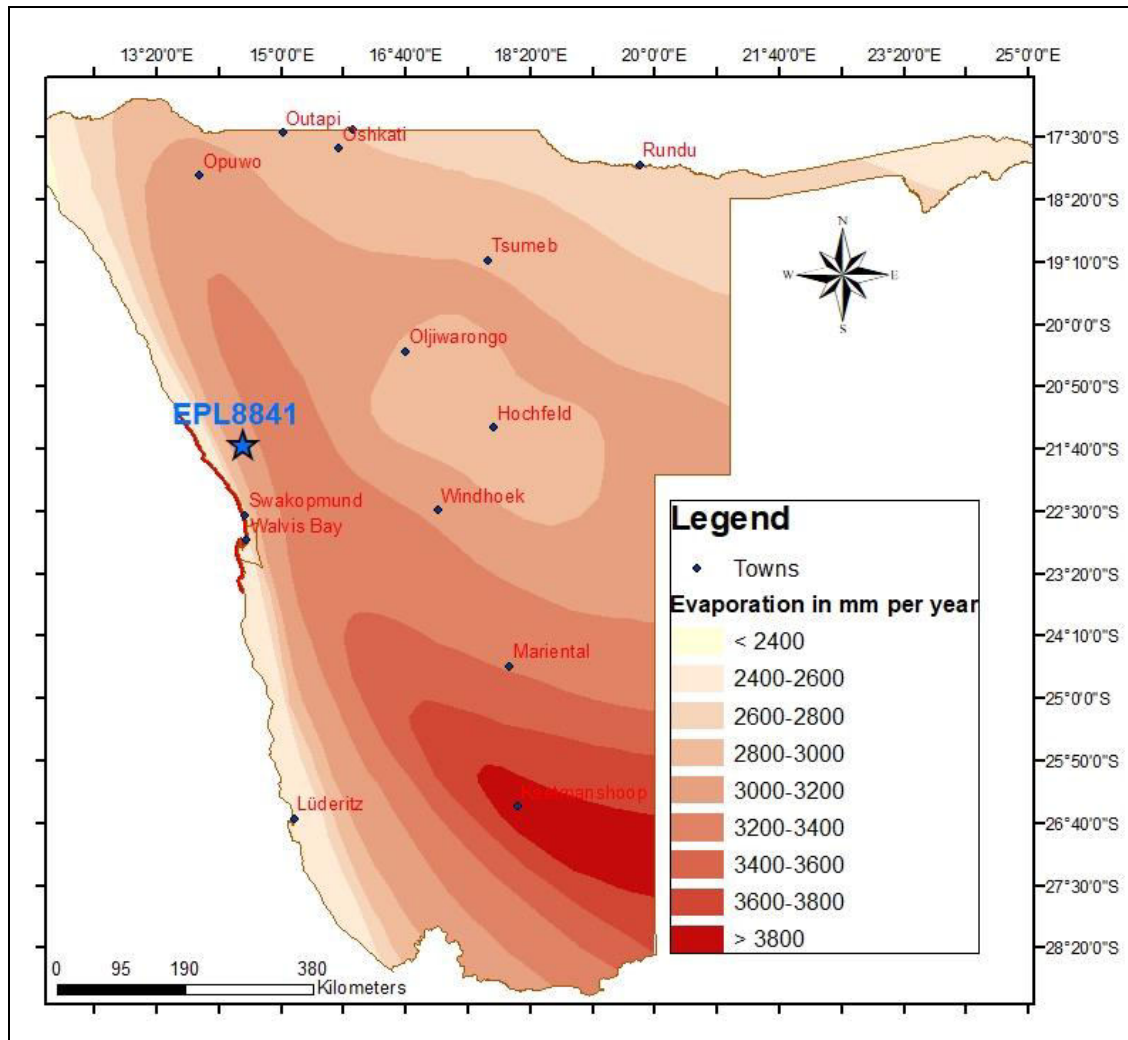


Fig. 20. Average annual evaporation in Namibia (ACACIA, 2002).

Table 3: Average climate in Okombahe and the surrounding areas (weather-atlas, 2022)

Month	Average max. temperature	Average min. temperature	Precipitation (mm)
January	31.4°C	19.9°C	44
February	30.2°C	19.2°C	82
March	29.2°C	18.5°C	52
April	28.0°C	16.5°C	17
May	26.3°C	14.3°C	1
June	23.6°C	10.3°C	0

July	23.7°C	9.8°C	0
August	26.9°C	11.8°C	0
September	30.7°C	15.5°C	2
October	32.4°C	18.4°C </td <td>13</td>	13
November	32.1°C	19.5°C	24
December	31.6°C	20.1°C	37

5.2.3 Wind

Around the project area, average wind speed ranges from 9 km/h which is normally experienced in February to 13.1 km/h experienced in July. Figure 22 below shows the average wind speed over the course of the year in Okombahe. Wind pattern near Okombahe area display two main trends; high velocity and frequency south to south-western winds in summer and high velocity, low frequency east to north-easterly winds during winter. During winter, the east winds generated over the hot Namib Desert have a strong effect on temperature, resulting in temperature in the upper 30 °C and tend to transport plenty of sand. Understanding the wind speed and direction is important so that one can forecast how dust impacts should be mitigated.

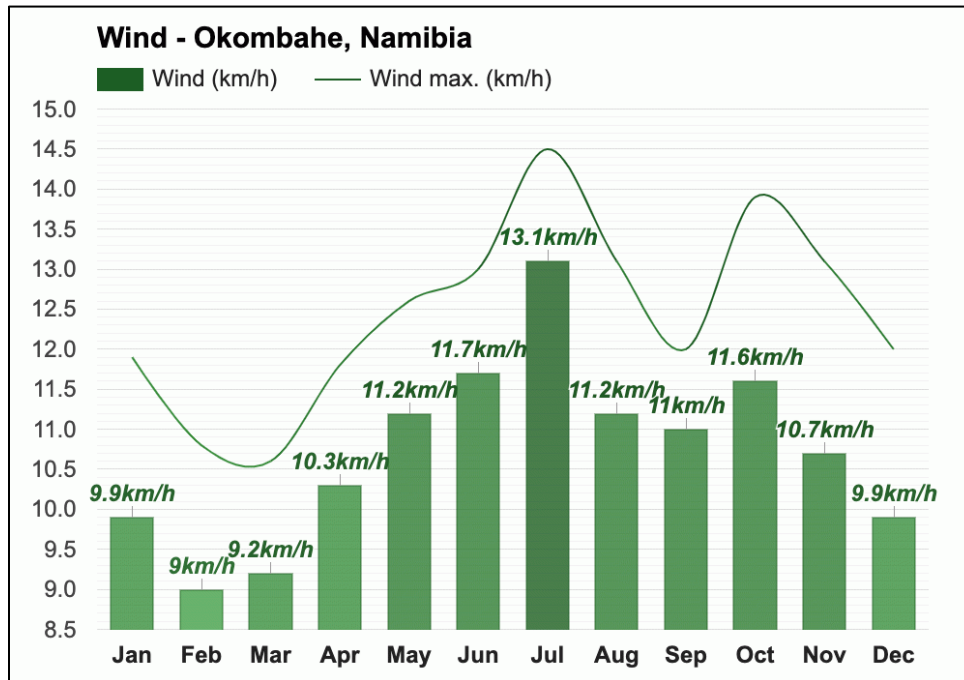


Fig 21. Average wind speed in Okombahe. An average of the wind speed per month is taken (Weather Atlas/Okombahe-climate, 2022).

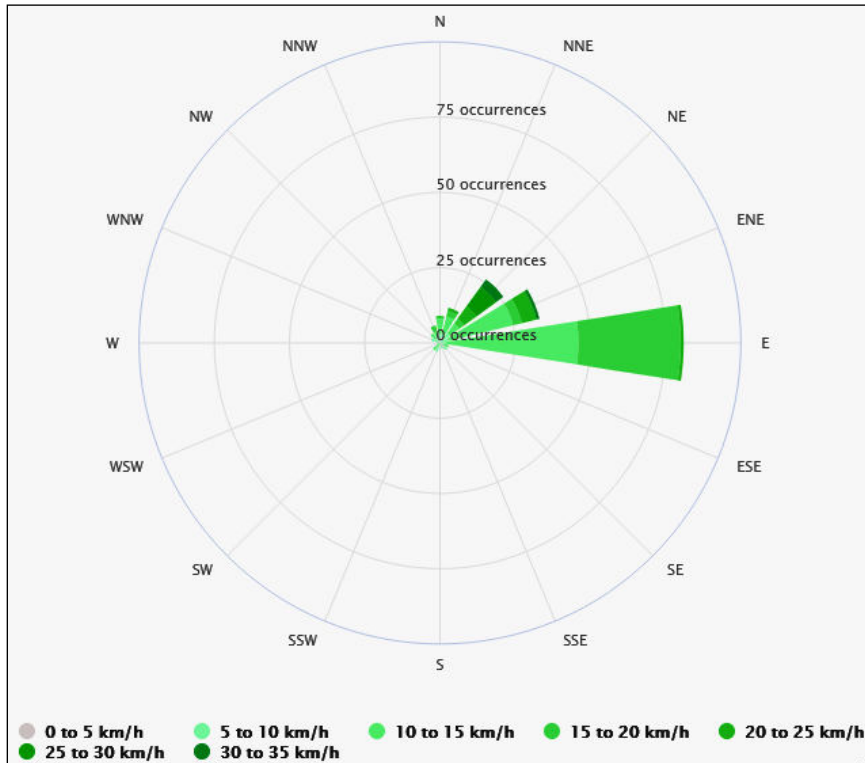


Fig 22. Wind rose for Okombahe (Meteoblue 2022).

5.2.4 Humidity

Humidity is a measure of the amount of water vapor in the atmosphere. The more humid the area is the more likely precipitation will occur. Humidity in Okombahe can rise up to 51% in March and drops as low as 21% in September (Weather Atlas/Okombahe-climate, 2022), in general relative humidity is 20-30%.

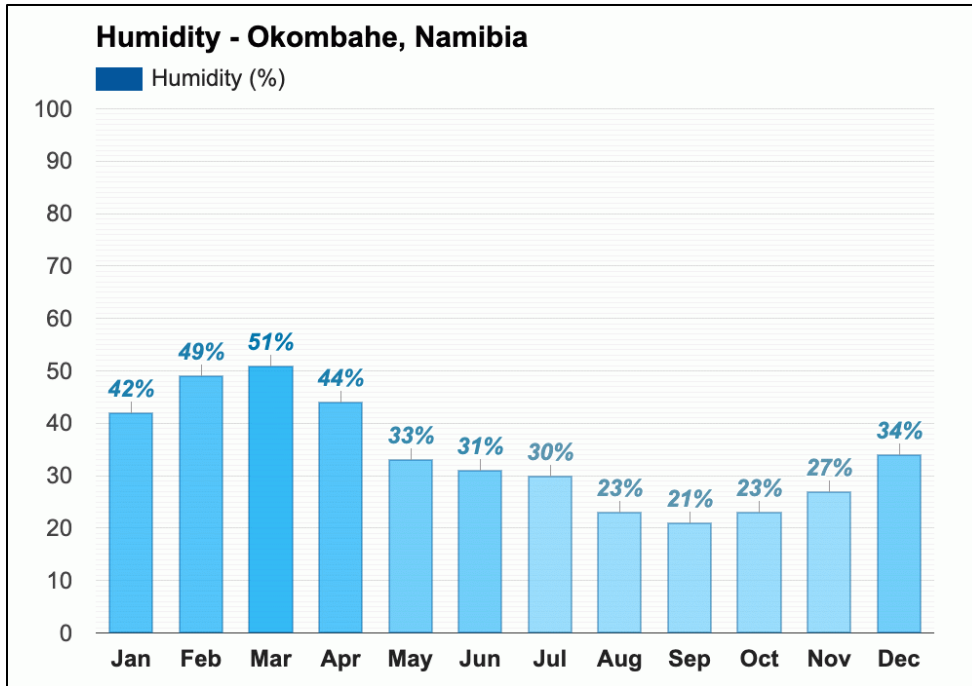


Fig .23. Average humidity in Okombahe. (Weather Atlas/Okombahe-climate, 2022).

5.2.5 .Air Quality

Data from accuweather.com shows that the air quality in the area is generally excellent with an air quality index of 16 AQI. The ground-level ozone (O₃) is about 16 µg/m³ which is excellent. The fine particle matter levels (PM 2.5) are about 7µg/m³. The particle matter (PM10) is about 4 µg/m³. The nitrogen dioxide (NO₂), carbon monoxide (CO), and Sulphur dioxide (SO₂) levels in the area are recorded to be 0 µg/m³. Probable sources of air pollution in the area are emissions and dust from vehicles travelling on gravel roads, dust generated by cattle grazing and wind erosion from the exposed areas.

5.3 Geology

5.3.1 Regional geology

The project area falls within the Damara belt which forms part of the Pan-African collision belts in southern Africa representing the formation of the Gondwana supercontinent (Miller, 2008). The Damara Orogen is a Neoproterozoic orogen consisting of three arms, the NNW-trending

coastal arm (the Kaoko Belt) extending into Angola, the NE-trending arm (the Damara Belt) which extends through central Namibia, across Botswana to the Zambezi belt (Miller, 2008), and the Gariiep Belt to the south extending into north-western South Africa. The Kaoko, Damara and Gariiep Belts evolved through phases of intra-continental rifting, spreading, subduction and continental collision lasting from approximately 800 or 900 Ma to ~460 Ma. In the Damara Belt, the Kalahari Craton was sub ducted beneath the Congo/Angola Craton and continental collision is dated at ~542 Ma (Miller, 2008).

The project area is in the NE-trending, Damara orogenic belt which has been divided into several different zones on the basis of stratigraphy, metamorphic grade, structure, geochronology, plutonic rocks and aeromagnetic expression (Miller, 1983, 1998). The zones are separated by tectonic lineaments, and these are, from north to south: the Northern Platform (NP), Northern Margin Zone (NMZ), **Northern Zone (NZ)**, Central Zone (CZ), Southern Zone (SZ), Southern Margin Zone (SMZ) and the Southern Foreland (Fig.22). The Central Zone is divided into northern (nCZ) and southern (sCZ) zones. The Okahandja Lineament zone (OLZ) is routinely regarded as part of the SZ (Miller, 2008). The project area is located in the Northern Zone (NZ) (Fig 25).

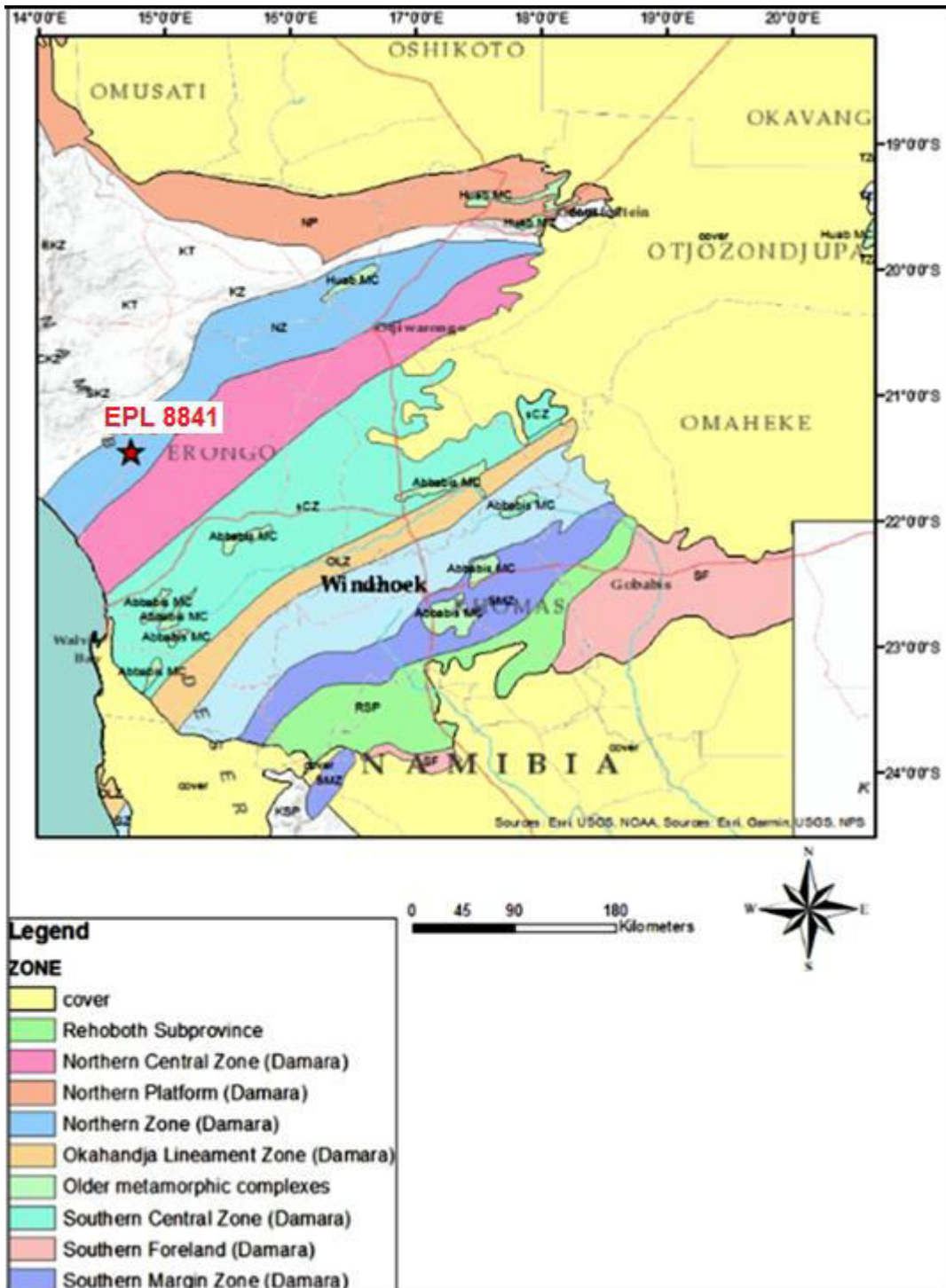


Fig. 24. Tectonic zones of the Damara orogenic belt. (Shape files are from the Geological Survey of Namibia). Exclusive Prospecting License (EPL8841) is located in the northern zone (NZ) of the Damara belt.

The project area falls within the Northern Zone (NZ) of the Damara Sequence. The northern Namibian tin belt, also known as the Cape Cross-Uis belt, is a ~120 km long, ~20 to 24 km wide, northeast trending belt that straddles from Cape Cross at the Atlantic Ocean in the west to beyond the settlement of Uis in the east (Diehl, 1986; Wagener, 1989). This belt belongs to a group of several northeast trending belts with the Cape Cross-Uis belt and the Sandamap-Kranzberg belt being well-known tin suppliers. The Cape Cross-Uis belt is host to numerous pegmatites that intruded into schistose greenschist facies Damaran meta-sedimentary rocks and into gneisses and Pan African granites (Diehl, 1993). These post-tectonic pegmatites contain noteworthy, but mostly sub-economic concentrations of Sn, Nb, Ta and Li.

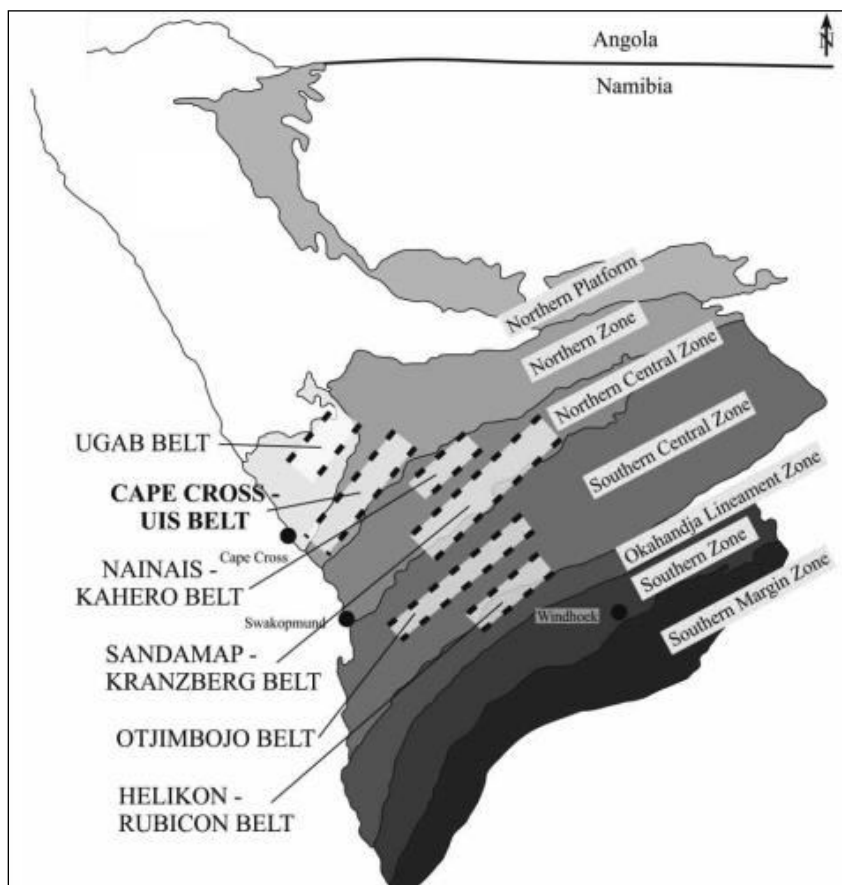


Fig. 25. The proposed project site is within the Cape Cross-Uis belt, one of several northeast trending pegmatite belts known for Li-Nb-Ta-Sn mineralized zones (modified after Keller et al., 1999).

5.3.2 Local Geology

Meta sedimentary rocks within the study area are mica schist and phyllites of the Kuiseb Formation and marbles of the Karibib Formation (Fig. 26). Meanwhile, non-foliated, late tectonic leucogranites (Damara intrusives)/ Lithium-cesium-tantalum pegmatites pre-dominate the southern part of the project area. Sand, gravel and calcrete of quaternary age extensively cover the extreme western portions of the of the project area. Lithium-cesium-tantalum (LCT) pegmatites are extremely coarse-grained granitic rocks that form small but mineralogically spectacular igneous bodies. These rocks account for about one-fourth of the world's lithium production (Naumov and Naumova, 2010).

Lithium-cesium-tantalum (LCT) pegmatites are mined for tin, high purity quartz, potassium feldspar, albite, kaolinite, white mica, gem beryl, gem tourmaline, and museum-quality specimens of many rare minerals (Glover and others, 2012; Simmons and others, 2012). Lithium-bearing phases are dominated by petalite and to a lesser degree amblygonite and the Lithium bearing clay cookeite. However, historic reports generally fail to identify these minerals due to the close resemblance of petalite to feldspar, the historically poor interest in lithium and the extra-ordinary measures required to analytically determine lithium contents. As a result, lithium contents and petalite abundances are historically underreported and are in fact far more significant than previously thought.

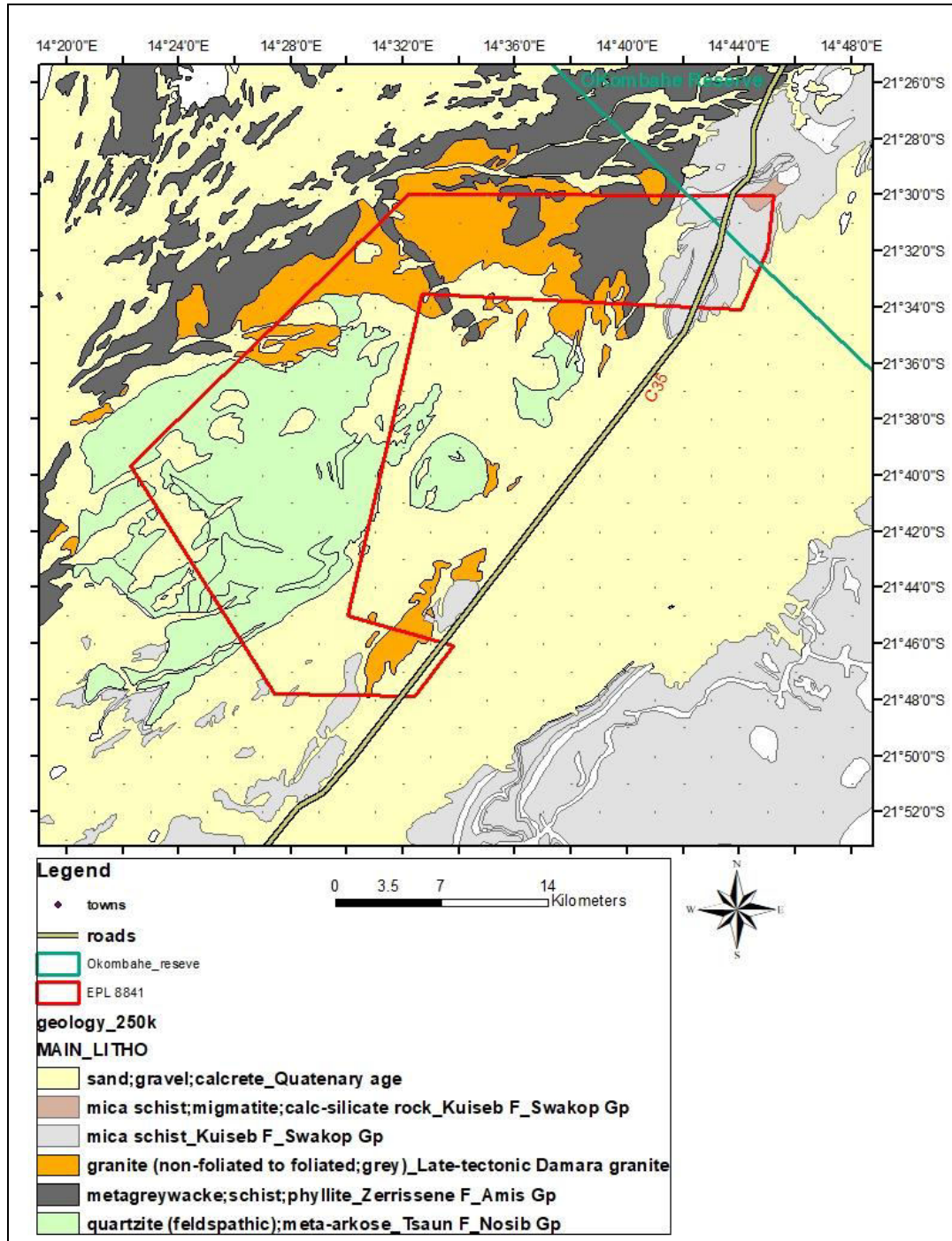


Fig. 26. Detailed local geology of EPL 8841.

5.4 Surface water

The Project is located in the water-scarce, semi-arid climate and arid climate which is largely devoid of surface hydrological features such as rivers, lakes, and dams. Due to the arid climate of the study area, surface water is only available for a short period of time after rainfall events. However, a number of previous mined open pits are filled with water around Uis settlement. Upper north of the project lies Omaruru river, the Omaruru River has its headwaters in the area just to the north of the Etjo Mountains, and south-east of Kalkfeld, and flows in a generally south-westward direction until it reaches the sea at Henties Bay, after approximately 300 km and covers a catchment area of approximately 11,870 km². The river has generated extensive alluvial deposits, which provide useful aquifers for groundwater abstraction at a number of locations along the river (Omaruru, Okombahe, Nei-Neis, Omdel), which are recharged by infrequent flood events.

5.5 Groundwater / hydrogeology

The project area is located in the upper part of Omaruru-Swakop River basin, which stretches over the Khomas, Erongo and Otjozondjupa Region. Tsiseb conservancy has two ephemeral rivers forming part of the conservancy boundaries, the Ugab River on the northern boundary and the Omaruru River flowing along the south-eastern boundary. The immediate EPL area falls within the area with little or no groundwater (Fig. 28), borehole yield range between 0.25 to 30 m³/h. Due to the scarce groundwater potential the yield of borehole water resources is no longer viable as a sustainable source of water resources. However, the eastern part of the project area is underlain by moderate productive but variable aquifer associated with faulted and karstified carbonate rocks which hosts Omaruru Delta (Omdel). Within Omdel, a precursor of the Omaruru River has incised paleo channels up to 120 m deep, which were later filled with sediments. The Omdel Dam was completed in 1994 and has a capacity of 40 Mm³. Its purpose is to catch floodwater, which is released downstream of the dam wall after the silt has settled out. The clear water flows 6 km as surface flow to an infiltration basin. The water infiltrates down to the aquifer where it is protected from evaporation and available for abstraction from the existing production boreholes.

Regional groundwater in the area is associated with the good secondary hydraulic properties of the limited surficial covers and extensive carbonate deposits. Depths to groundwater are within a range of 30-75 meters below ground level (m bgl). The area is in close proximity to Omaruru delta aquifer system which is vulnerable to pollution in case of hydrocarbon spillage on the surface. Therefore, the proponent is recommended to drill at least two to three monitoring borehole in order to carry out quarterly groundwater quality analysis. However, this will only be applicable during the mining phase since no drilling of boreholes will be required during the exploration phase. Permission for borehole drilling, groundwater abstraction will be obtained from the responsible land owners as well as the Ministry of Agriculture, Water and Land Reform (MAWLR) shall the need for groundwater uses arise.

Table 4: Identified boreholes in the vicinity of the project area

Borehole ID	Longitude	Latitude	Total depth	Initial rest water level	Yield(m³/h)
WW016662	14.46880	-21.55070	74.70	21.54	2.00
WW021710	14.39280	-21.56440	75.20	17.70	
WW031239	14.29320	-21.54050	15.00	12.97	
WW031240	14.29330	-21.54040	18.00	16.77	
WW031241	14.29360	-21.54020	28.00	20.22	
WW031242	14.29370	-21.54010	30.00	20.00	0.25
WW031243	14.29390	-21.54010	30.00	20.32	
WW031244	14.29420	-21.54010	36.00	20.02	
WW031245	14.29440	-21.54010	42.00	20.06	
WW031367	14.29480	-21.53480	62.00	42.38	
WW031368	14.29480	-21.53580	38.00	37.59	
WW031369	14.29590	-21.53380	70.00	45.39	
WW031370	14.29590	-21.53540	41.00	31.38	
WW032366	14.29360	-21.54050	18.00	10.18	
WW032367	14.29370	-21.54080	14.00	10.32	
WW032368	14.29380	-21.54100	7.00	1.52	
WW032369	14.29480	-21.54010	15.00	11.00	
WW032370	14.29480	-21.54030	24.00	19.00	
WW032371	14.29490	-21.54060	36.00	18.36	
WW033068	14.29410	-21.54020	30.00	20.65	30.00
WW033069	14.29380	-21.54030	29.00	20.49	20.00

WW033070	14.29400	-21.54030	29.00	19.84	
WW033071	14.29390	-21.54040	28.00	19.74	
WW033072	14.29380	-21.54040	26.00	19.65	
WW033074	14.29370	-21.54030	30.00	19.83	
WW033076	14.29400	-21.54050	27.00	19.54	
WW060109	14.29490	-21.54060	19.00	17.87	
WW086520	14.29330	-21.53560	47.00	41.18	

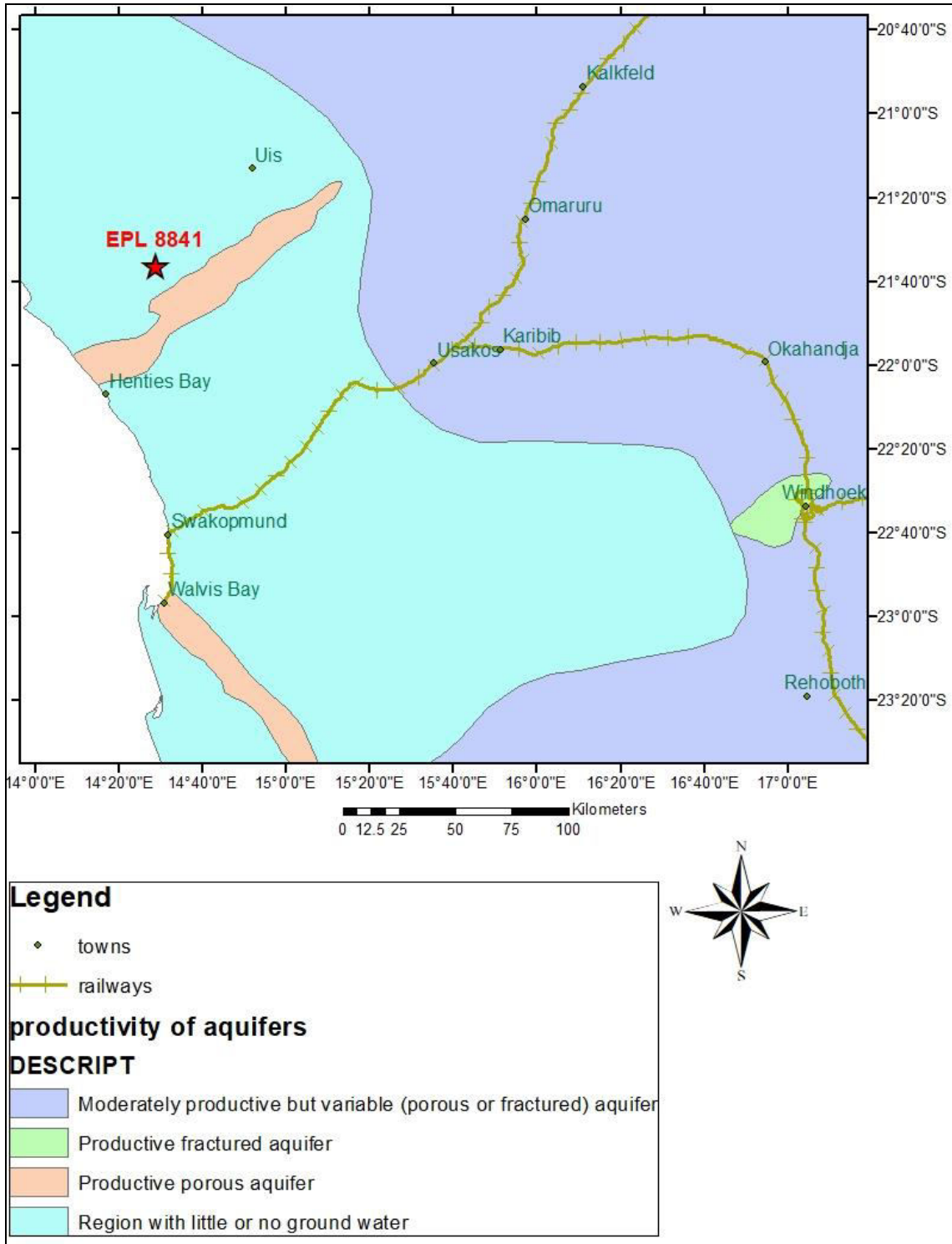


Fig.27.Hydrogeological Map of the project area. The project area is underlain by a region with little or no groundwater.

5.6 Topography

The Project is situated within a transition zone between a semi-arid climate and arid climate due to its geographic location in the escarpment between the Namib Desert and the Central Plateau. Relief is moderate to high with elevation ranging from approximately 800 to 900 m above sea level. To the west, the Brandberg Mountain rises to over 2500m. The study area is characterised by localized mountainous areas with flat regions in between covered by eroded sand, forming conspicuous topographic elevated surface expressions.

5.7 Terrestrial biodiversity: fauna and flora

Introduction

As with all developmental projects in pristine areas impacts on fauna and flora are inevitable as such identification of high-risk habitats prior to commencement of the proposed activities coupled with environmentally acceptable mitigations will lessen the severity of the overall impact. An impact assessment of the proposed exploration on fauna and flora was carried out during the site visits conducted on the 23rd of June 2022. A thorough assessment was carried out within the project area by means of field observations, recording and data collecting. Some of the information is based on a detailed literature review. The purpose of the Fauna and flora literature review is to identify all potential amphibians, reptiles, mammals and plants expected on the project area. The proposed exploration area supports limited fauna species but there are no species that are exclusive to the study area. Further flora assessment was enhanced with the use of species lists of plants occurring within the quarter degree squares which was extracted from the database, Botanical Research and Herbarium Management System which is found at the National Botanical Research Institute in Windhoek.

5.7.1 Flora

The project area falls within the Semi-desert vegetation type. In form, vegetation is generally sparse, with few trees and a thin variety of grass. Regionally the vegetation of the barren and

desolated plains of the Namib Desert is mostly restricted to the sandy beds of non-perennial drainage lines, which flow only after substantial rainfall in their catchment areas further away. Although dry, these riverbeds often contain subsurface water at shallow depths throughout the year. Around the project area, the landscape is more barren and rocky with scanty vegetation. Grass cover only occurs after good local rain events. It is estimated that up to 111 grasses – 73 to 88 species – (Müller, 2007; Van Oudshoorn, 1999) occur in the general area. The most important grass expected in the area is the endemic *Setaria finite* associated with ephemeral drainage lines. Although the season (end of dry and beginning of wet) made the identification of grasses difficult, none of the grasses are exclusively associated with the proposed exploration area, nor protected species, which minimizes the overall effect on grasses. Few shrubs of Camelthorn (red-thorn (*Acacia reficiens*) and creamy smooth bark young shrubs known as kobas (*Cyphostemma currorii*) were also observed during site observation.

5.7.2 Fauna

Mammals

Okombahe is found in the western highlands biome regions. The area supports variety of fauna including as shown in the table below, found in Okombahe reserve. The site visit was conducted during the day and there was no wildlife observed. This, however, does not mean that there was no wildlife in the project area, but it could be explained by the fact that wildlife was hiding in shades of the far vegetation and possibly under rock outcrops, out of sight and away from human presence. Based on literature review, implementation of the proposed project activities in the area will not have a negative impact on any of the species in the project area.

Table 5: Mammal species which are likely to occur within the project area.

No	Scientific name	Common name	No	Scientific name	Common name
1	<i>Acinonyx jubatus</i>	Cheetah	6	<i>Oryx Gazella</i>	Gemsbok
2	<i>Antidorcas marsupialis</i>	Springbok	7	<i>Panthera leo</i>	Lion
3	<i>Crocuta crocuta</i>	Spotted Hyena	8	<i>Panthera pardus</i>	Leopard
4	<i>Equus zebra hartmannae</i>	Zebra	9	<i>Tragelaphus streliceros</i>	Kudu
5	<i>Hyaena brunnea</i>	Brown Hyena	10	<i>Oryx Gazella</i>	Gemsbok

Reptiles

Griffin (1998) highlighted the presence of 261 species of reptiles which are present in Namibia. These reptiles make up 30% of the reptile species found on the continent. 55 species of Namibian Lizards are classified as endemic (Griffin, 1998). The author, Griffin (1998), describes that more than 60% of the reptiles found in Namibia are protected by the conservation Ordinance. Although exploration activities do affect reptile habitat, the project will not have any significant impact on the reptile species within the proposed exploration area. Namibia, with 129 species of lizards, has one of the continent's richest lizard Fauna. Vertebrate fauna species that may likely be affected by the proposed exploration will be mainly those with limited mobility such as some reptiles. The literature review showed that there are approximately 40 reptile species that are expected to occur in the Uis area, meanwhile seven reptile species are strictly endemic to EPL area as shown below:

Table 6: Reptile species which are likely to occur within the project area.

Scientific name	Common name
<i>Sepsina alberti</i>	Albert's skink or Albert's burrowing skink
<i>Pedioplanis husabensis</i>	Husab sand lizard
<i>Nanaqua spinytail lizard</i>	<i>Cordylus namaquensis</i>
<i>Cordylus campbelli</i>	Campbell's spinytail lizard
<i>Cordylus pustulatus</i>	Herero girdled lizard
<i>Pachydactylus gaiasensis</i>	Brandber thick-toed gecko
	Albert's skunk

Avian diversity

Simmons et al (2003) points that although Namibia's Avifauna is comparatively sparse compared to the high rainfall equatorial areas elsewhere in Africa, approximately 658 species have already been recorded with a diverse unique group of arid endemics. There are approximately 650 species of birds that have been recorded in Namibia, although the country's avifauna is comparatively sparse compared to the high rainfall equatorial areas in Africa (Brown & Lawson, 1989). Brown et al (1989) mentions that 14 species of birds are endemic or near

endemic to Namibia with the majority of Namibian endemics occurring in the Savannah of which ten species occur in a north-south belt of dry Savannah in Central Namibia. Approximately 40 bird species may occur in the project vicinity. Although red-listed /species including the Ludwig's Bustard and Kori Bustard, and various eagles are of likely occurrence.

5.8 Archaeology and Heritage Sites

Archaeological and Heritage Impact Assessment for the project area was carried out by a qualified archaeologist in a form of a site walkover survey. Based on Desktop study, there are no declared heritage sites by the National Heritage Council of Namibia on the EPL area. In the 40 km radius of the project area, two declared national heritage sites namely the Brandberg and Cape Cross were documented. Accidental find procedure at the subject site must be strictly followed in accordance with the stipulations of the Namibian National Heritage Act. Moreover, a separate heritage impact assessment will be annexed to this report.

6. Assessment of Impacts

Overview

Environmental aspects and potential impacts were qualitatively assessed and identified by the Environmental Practitioner during the screening and assessment phases, in consultation with authorities, IAPs and the environmental team. This section provides a summary of activities associated with the proposed project in various phases as well as associated environmental aspects and potential impacts. The purpose of this document is, therefore, to guide environmental management throughout the different phases of the proposed exploration activities, namely: planning, prospecting & exploration, and decommissioning & rehabilitation phase:

Project Phases addressed

- (a) **Planning phase** - This is the stage of the proposed project during which the Proponent prepare all the administrative and technical requirements needed for the actual works on the ground. The planning includes things like obtaining the necessary permitting and authorization from relevant national and local stakeholders (such as affected communities, traditional authorities, etc.), facilitating the recruitment and procurement processes, etc., in preparation of the exploration activities (and site maintenance).
- (b) **Prospecting and Exploration phase** - This is the phase where the proponent will do prospecting and exploration activities for the targeted commodities groups and undertake related activities on site. It is also the phase during which maintenance of the area, equipment and machinery is done by the Proponent. This is also the phase when mitigation measures are implemented, and the monitoring plan put in place.
- (c) **Decommissioning, site closure and rehabilitation:**
This is the phase when exploration activities cease as a result of either poor exploration results or loss of market demand for the targeted commodity. Rehabilitation measures will have to put in place during exploration and before decommissioning.

Identified potential impacts

Positive impacts

- Employment creation
- Revenue generation through royalties and taxes
- Local development

Negative impacts

- Air quality : dust generation and fumes emission
- Noise and vibration impacts
- Occupational health and safety
- Impact on terrestrial biodiversity (fauna and flora)
- Impact on ground and surface water
- Heritage and archaeological impact
- Visual impact
- Occupational health, safety and security
- Fire and explosion hazards
- Solid waste management

6.1 Impact analysis and evaluation

In this section, the impacts of the exploration activities on the human and biophysical environment were evaluated and analyzed. The identified impacts were assessed in terms of probability (likelihood of occurring), extent (spatial scale), magnitude (severity) and duration (temporal scale). The impact assessment methodology used to determine the significance of impacts prior and after mitigation. This methodology ensures uniformity and that potential

impacts can be addressed in a standard manner. The following assessment methodology was used to examine each impact identified:

Table 7: Impact assessment criteria

PART A: DEFINITION AND CRITERIA		
Definition of SIGNIFICANCE	Significance = consequence x probability	
Definition of CONSEQUENCE	Consequence is a function of severity, spatial extent and duration	
Criteria for ranking of the SEVERITY of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action. Irreplaceable loss of resources.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints. Noticeable loss of resources.
	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints. Limited loss of resources.
	L+	Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	M+	Moderate improvement. Will be within or better than the recommended level. No observed reaction.
	H+	Substantial improvement. Will be within or better than the recommended level. Favorable publicity.
Criteria for ranking the DURATION of impacts	L	Quickly reversible. Less than the project life. Short term
	M	Reversible over time. Life of the project. Medium term
	H	Permanent. Beyond closure. Long term.
Criteria for ranking the SPATIAL SCALE of impacts	L	Localized - Within the site boundary.
	M	Fairly widespread – Beyond the site boundary. Local
	H	Widespread – Far beyond site boundary. Regional/ national

PART B: DETERMINING CONSEQUENCE					
SEVERITY = L					
DURATION	Long term	H	Medium	Medium	Medium
	Medium term	M	Low	Low	Medium
	Short term	L	Low	Low	Medium

SEVERITY = M					
DURATION	Long term	H	Medium	High	High
	Medium term	M	Medium	Medium	High
	Short term	L	Low	Medium	Medium

SEVERITY = H					
DURATION	Long term	H	High	High	High
	Medium term	M	Medium	Medium	High
	Short term	L	Medium	Medium	High
			L	M	H
			Localized Within site boundary Site	Fairly widespread Beyond site boundary Local	Widespread Far beyond site boundary Regional/ national
SPATIAL SCALE					

PART C: DETERMINING SIGNIFICANCE				
Definite/ Continuous	H	Medium	Medium	High
Possible/ frequent	M	Medium	High	High
Unlikely/ seldom	L	Low	Low	Medium
		L	M	H
CONSEQUENCE				

PART C: DETERMINING SIGNIFICANCE					
PROBABILITY (of exposure to impacts)	Definite/ Continuous	H	Medium	Medium	High
	Possible/ frequent	M	Medium	Medium	High
	Unlikely/ seldom	L	Low	Low	Medium

	L	M	H
	CONSEQUENCE		

PART D: INTERPRETATION OF SIGNIFICANCE	
Significance	Decision guideline
High	It would influence the decision regardless of any possible mitigation.
Medium	It should have an influence on the decision unless it is mitigated.
Low	It will not have an influence on the decision.

H+ = High positive; H= High; L+ = Low positive; L = Low; M = Medium

Mitigation measures

Where negative impacts are identified, mitigation objectives have been set, and practical, attainable mitigation measures must be recommended that will minimize or eliminate the impacts. Where mitigation is not feasible, this has been stated and reasons given. In the case of positive impacts, enhancement measures are recommended for optimizing the benefit to be derived.

Monitoring

Monitoring requirements with quantifiable standards to assess the effectiveness of mitigation actions have been recommended where appropriate. These must indicate what actions are required, by whom, and the timing and frequency thereof. If further investigations must be undertaken and monitoring programmes implemented before, during and after operations.

6.4. Assessment findings

Air quality: This assessment was conducted in terms of dust generated from drilling and vehicle entrainment on gravel and off roads, in close proximity to residents. In the unmitigated scenario there is the potential for nuisance impacts relating to people residing in the surrounding area. However, with appropriate mitigation and management the potential impacts are greatly reduced and the significance rating falls to low.

Biodiversity: The assessment for biodiversity relates to the impact that personnel performing exploration activities have on the surrounding fauna and vegetation. It specifically focuses on the impacts associated with illegal hunting, poaching and the collection of firewood. In the unmitigated scenario the severity and the probability of the impacts were found to be medium, however, with mitigation and management measures both were reduced to a rating of low.

Socio-Economic: The assessment of socio-economic impacts focuses on the inconvenience the exploration activities have on the Conservancy. In the unmitigated scenario the significance rating is medium, however, with appropriate mitigation and management the potential impacts are greatly reduced and the significance rating falls to low.

Land-use: The assessment for land use refers specifically to the impact the exploration activities have on professional hunting activities. In the unmitigated scenario the duration of the impact was found to be medium, as there may be period where the land cannot be used for hunting purposes. With the addition of mitigation and management measure, the duration drops to low and the significance rating drops from medium to low.

Noise: The assessment of noise impacts is with specific regard to exploration activities taking place near a residence and resulting in a nuisance impact, and the severity of the impact is rated medium. In the mitigated scenario, the severity of the impact is reduced and is rated low.

Surface water/

Groundwater: The assessment relates to the impacts associated with the spillage of hydrocarbons within the exploration area, with specific regard to water resources. Given the relatively localized nature of the activities, as well as the introduction of hydrocarbon spill management measures, the significance rating for both the unmitigated and mitigated scenario remain low.

Waste management: Given the remote location and the land-use, the dumping of domestic waste within the exploration area could prove hazardous to wildlife and livestock, as well as impede agricultural production. However, given the small scale of the activities, a large amount of waste will not be generated. With mitigation and management measures in place the rating remain slow. The details regarding the management and mitigation measures can be found in Section 6.2 and the Environmental Management Plan.

6.2 Identified impacts on bio-physical environment

Negative Impacts

The following potential effects on the environment during the construction, operation and decommissioning phase of the quarrying project have been identified:

6.2.1 Air quality impacts: dust generation and fume emissions

The proposed exploration activities are the potential of fugitive sources for the dust particles as they are easily dispersed and carried away by the winds. During the operation phase dust will be generated onsite by earth moving equipment and also on the gravel road by trucks and vehicles. Furthermore, continuous movements of people, vehicles and earth moving vehicles on site can thus loosen and re-suspend the deposited material again into the air leading to air pollution. Windblown particulates from natural exposed surfaces common especially in semi-arid and arid areas can result in significant dust emissions with high particulate concentrations near the source locations. As mentioned above, emission of dust into the environment can be effectively contained by means of damping. Dust may be might be aggravated during the winter months when strong winds occur (>10 m/s).

Moreover, vehicle exhausts contain a number of pollutants including carbon dioxide (CO₂), carbon monoxide (CO), hydrocarbons, oxides of nitrogen (NO_x), Sulphur and PM10. Tiny amounts of poisonous trace elements such as lead, cadmium and nickel are also present. The

quantity of each pollutant emitted depends upon the type and quantity of fuel used, engine size, speed of the vehicle and abatement equipment fitted. Once emitted, the pollutants are diluted and dispersed in the ambient air. Pollution by hydrocarbon combustion in vehicles is of less concern as field vehicles are fitted with suitable exhaust filters.

Dust generated and air pollutants suspended in the air could be inhaled by the workers leading to respiratory diseases. The main respiratory diseases related to inhale mineral dust include pneumoconiosis, chronic obstructive pulmonary disease (CODP) and lung cancer. it should however be noted that the scale and nature of the proposed project is such that prolonged and continuous exposure to mineral dust is not expected. Dust generated and fumes emissions do not only impact humans, but also flora. The fallout dust settling on vegetation is likely to affect rates of photosynthesis and transpiration in a long term. The settled dust on plant leaves may not only affect vegetation functionality but also livestock that feed on vegetation. Where possible the project should avoid, minimize, and control adverse impacts to human health, safety, and the environment from emissions to air.

Table 8:. Qualitative assessment of air quality impacts.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	M/H	L	M	M	M
Mitigated	L	L	L	L	L/M	L

Mitigation Measures to be enforced

- Dust suppressants shall be applied to all the exploration activities as well as all off roads and gravel roads.
- The speed of exploration vehicles must be strictly controlled to reduce dust or prevent deterioration of the roads being used.
- All off roads in the project area should have a speed limit of 50km/h in order to minimize the amount of dust generated by vehicles.
- During high wind conditions the proponent must make the decision to cease works until the wind has calmed down.

- Use of personal protective equipment for proper dust control for respiratory protection and other necessary PPE (gloves, work suits, sun hats etc.).
- Converting high-use vehicles to cleaner fuels, where feasible
- Installing and maintaining emissions control devices, such as catalytic converters.
- Implementing a regular vehicle maintenance and repair program.
- The movement of drilling related vehicles on unpaved access track will be on a small scale.
- Dust control measures such as water spray should be used on gravel road and near exploration sites to suppress the dust that may emanate from exploration activities such as drilling, trenching and test quarrying sites.
- Regardless of the size or type of vehicle, fleet owners /operators should implement the manufacturer recommended engine maintenance programs.

Monitoring

- Daily inspection by the ENC of the gravel roads and exploration site on possible dust creation that requires attention.
- Daily inspection on site by the ENC to ensure that all workers are wearing their protective clothes.

6.2.2 Noise and vibration impacts

Noise sources in the proposed project are of various types, identified sources are: point sources, line source, area source, and moving sources. Potential noise during exploration activities may originate from vehicles, machinery, hammers, excavators, and drill rigs. Drilling rigs may remain on site for periods ranging from days, weeks or months. Noise levels can be up 80dB for diamond drilling and 120dB for reverse circulation at rig source on a <100m² footprint, hence the employees are the immediate receptor of the noise impacts.

Noise pollution can be defined as any disturbing or unwanted noise that interferes or harms human or wildlife. Continuous exposure to noise leads to multiple adverse effects on physical

and mental state of the mining community as a whole. Some of these effects are: tinnitus, and noise induced hearing loss (NIHL), reduced performance, sleeping difficulties, disturbance in conversation, annoyance or stress, anxiety, depression and high blood pressure. According to ISO 18001 standards, workers are not allowed to work under noise levels that are equal to or exceed 85 decibels per 8 hours. Noise pollution has negative impact on wildlife species by reducing habitat quality, increase stress level land masking other sounds.

A noise baseline survey will be undertaken prior to the commencement of the mining project to assess noise level impacts at designated points of the project site. The study will focus on the area noise monitoring to assess noise level of the study as well as a personal noise dosimetry to measure the percentage of noise dose to which a person is exposed during movements in different noisy or quieter areas during a working shift within the mine.

Table 9: Shows qualitative assessment of noise and vibration impact.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	L	M/H	L	M	M
Mitigated	L	L/M	L	L	L/M	L

Mitigation Measures to be enforced:

- Drilling will only be conducted during the day, where the drill-site is located close to a dwelling.
- Noise from project vehicles and equipment on the working sites of the project area should be at acceptable levels.
- Noise levels should not be equal to or exceed 85dBA for workers working an 8-hour shift (according to ISO 18000).
- Workers working near high noise machinery and vehicles should be provided with ear protection equipment such as ear muffs and earplugs.
- Reduction of noise from drilling rigs by using down hole drilling

- No noise generating activities should be undertaken before 8am and after 17:00 hours, over weekends and on public holidays.
- Employees should be limited to working hours only at most 8 hours per day.
- In the event that activities continue outside the stipulated hours the contractor will communicate such occurrences to potentially affected communities prior to commencing such activities.
- Do not allow the use of horns/hooters as a general communication tool, but use it only where necessary as a safety measure.
- Safe minimum distance from noise generating activities should be introduced.

Monitoring

Noise monitoring may be carried out for the purposes of establishing the existing ambient noise levels in the area of the proposed project, or for verifying operational phase noise levels. Noise monitoring programs should be designed and conducted by trained specialists. The type of acoustic indices recorded depends on the type of noise being monitored, as established by a noise expert. Continuous monitoring of noise levels should be conducted to make sure the noise levels at the site does not exceed acceptable limits.

6.2.3 Impacts on terrestrial biodiversity

The transformation of land for any purpose results in the destruction of the site-specific biodiversity, the fragmentation of habitats, reduces its intrinsic functionality and reduces the linkage role that undeveloped land fulfils between different areas of biodiversity importance. The alteration will occur through physical disturbance and continued human presence and use. Biodiversity assessment relates to the impact that personnel have on the surrounding fauna and vegetation. Some of the activities of the proposed project such as vehicle movement, human movements, excavating pose a risk to the integrity of baseline biodiversity as well as the

biological productivity of the site and the immediate proximity. The following mitigations are to be undertaken to minimize further impact on the existing biodiversity:

Fauna

The earthworks, drilling and quarrying done to uncover mineral bearing rock units could result in land degradation, leading to habitat loss. Endemic species are mostly affected since even the slightest disruption to their habitat can result in extinction or put them at high risk of extinction.

The proponent shall ensure that no animal shall be captured, killed or harmed by any of the employees in any way. Wildlife poaching will strongly be avoided as this is an offence and anyone caught infringing in this regard will face suspension from the project and will be liable for prosecution.

Avifauna

If care is not taken, possible disturbance of birds or nest on sites by employees is expected.

Should the employees observe any bird nesting sites for endangered avifauna such as vultures, they should notify Ministry of Environment, Forestry and Tourism.

Flora/ Vegetation

Pollutants such as dust, gaseous emissions and air- borne particulates will be produced and get deposited on the plants. Most of the effects of dust particles on plants include the potential to block and damage the stomata such that photosynthesis and respiration are affected. This will no doubt affect the physiological activities of the plants most especially those around the project site such as in photosynthesis and respiration. The implication of these is that some of the plants may have retarded growth while others may be eliminated

The natural vegetation is seemingly undisturbed in the project area except for grasses, which have been grazed by livestock and wild animals. Some vegetation species in the area may be adversely impacted by the project. If particularly important species are found, they will be located by GPS and their locations communicated to the Ministry of Environment, Forestry and Tourism. Such locations will then be demarcated and completely avoided

Mitigation Measures to be enforced: **flora**

- The footprint of the area to be disturbed will be minimized as far as is practically possible.
- Remove unique fauna and sensitive fauna before commencing with the development activities and relocate to a less sensitive/disturbed site if possible.
- Disturbed areas must be kept to a minimum. Off-road driving should not be allowed and only existing tracks should be used.
- Remove unique fauna and sensitive fauna before commencing with the development activities and relocate to a less sensitive/disturbed site if possible.
- Recommend the planting of local indigenous species of flora as part of the landscaping as these species would require less maintenance than exotic species and have important ecological functions in terms of carbon sequestration from decomposing materials at the site.
- Disturbance of marginal vegetation in the mountains should be limited.
- Where it is clear that certain large species will be destroyed consideration should be given to offering to rescue the individuals involved and relocate them to nearby gardens.
- Transplant removed trees where possible, or plant new trees in lieu of those that have been removed.
- The protected and endemic species should be re-introduced in the area.

Mitigation Measures to be enforced: **fauna**

- Honour agreements set out in the site-access contracts, specifically relating to the areas utilized for professional hunting. Special consideration should be given to the sensitive hunting season.
- Barriers/barricades confining driving trucks must be erected to avoid stray driving and trampling on habitat. Proper demarcation of the exploration area.
- Avoid disturbance on invertebrate on-site and along the gravel road stretch.
- Avoid the creation of multiples roads strips, which could result in the disturbance of breeding sites for various mammals.
- A fauna survey will be conducted to determine the effect of fragmented habitat on game species should the need arise.
- Care will be taken to ensure that no litter is lying around as these may end up being ingested by wild animals
- No workers will be allowed to collect or snare, hunt or otherwise capture any wild animal.
- No domestic animals will be permitted on the exploration site by means of erecting a perimeter fence; small stock should graze at designated areas.
- Birds or Nest sites will not be disturbed by any employee, visitor or contractor.
- If possible encountered bird kills and nest removal should be registered in a biodiversity data-base and information should be made available to the general public.
- There should be limited movement of heavy-duty machinery and exploration equipment in the area to avoid interference.

Methods for monitoring:

- Regular monitoring of any unusual signs of animal habitat.

Table 10: Shows the qualitative impact assessment for terrestrial biodiversity.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	M	M	L	M	M
Mitigated	L	L	L	L	L	L

Alien invasive plants

Alien invasive plants are prevalent in areas affected by land transformation and anthropogenic disturbance. It is a well-known fact that disturbance to the natural environment often encourages the establishment of alien invasive weed species. It is also possible that, plant or seed material may adhere to car tyres or animals. In some cases seeds of alien invasive plants may blow from debris removed at sites.

Some of the plant species that could become invasive in the area are listed below:

- *Prosopisglandulosa*
- *Lantana camara*
- *Cyperusesculentus*
- *Opuntia imbricate*
- *Cereus jamacara*
- *Melia azedarach*
- *Harissia martini*

There are numerous ways in which invasive species can be introduced unintentionally.

Table 11: Shows the qualitative impact assessment of alien invasive plants.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	L	L	L	L	L	L
Mitigated	L	L	L	L	L	L

Mitigation Measures to be enforced:

- The site manager will ensure that debris is properly disposed.
- Vehicle tyres inspections can be carried out although this may not be a practical mitigation measure.
- The proponent should implement an alien plants awareness campaign to educate and sensitize the employees and the local community on the menace of planting alien vegetation in the area.
- Eradicating alien plants by using an Area Management Plan.
- Prevent the introduction of potentially invasive alien ornamental plant species.

- The proponent should adopt and support the implementation of an annual alien plants clearing campaign.

Methods for monitoring:

- Regular monitoring of any unusual signs of alien species.
- The proponent and local community should establish an alien plant task force to ensure that there is no planting of alien plants species in the area.

6.2.4 Land and soil disturbance

Exploration and mining activities such as land clearing, excavations, trenching, drilling and quarrying can potentially result in disturbance of landform and the soil cover in the immediate surroundings of the project site. This could potentially leave the site soils exposed to erosion. This undertaking has the potential of disturbing the structural composition and biological productivity of topsoil and If not taken care of this can lead to land degradation. However, most parts of the project area are covered with grass and shrubs. Plant cover has the potential to prevent wind and water erosion by covering and binding the soil with their roots.

Table 12: Shows the qualitative impact assessment of land and soil disturbance.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	M/H	M	M	H	M
Mitigated	L	L	L	L	M	L

Mitigation Measures to be enforced:

- The footprint of the area to be disturbed will be minimized as far as is practically possible.
- The overburden, i.e., that layer of soil immediately beneath the topsoil, will be removed and stored separately from the topsoil.

- Where topsoil is pre stripped, it should be stored for future site rehabilitation activities. Topsoil management should include maintenance of soil integrity in readiness for future use.
- Implementation of soil conservation measures during the project lifetime. Moreover overburden should be handled more efficiently during exploration works to avoid erosion when subjected to erosional processes.
- Prevent creation of huge piles of waste rocks by performing sequential backfilling.
- Stockpiled topsoil and overburden waste rocks should be used to backfill the trenches, excavations and any disturbed sites on the project.
- The access road to the mining site must be established in consultation with the landowner and usage of existing roads shall be enforced.
- The design, construction, and location of access to main roads will be in accordance with the requirements laid down by the controlling authority.
- Land markings, vehicle tracks, trenches and excavations shall be restored to the original landform and, visual state as much as possible.
- In the case of dual or multiple uses of access roads by other users, arrangements for multiple responsibilities must be made with the other users. If not, the maintenance of access roads will be the responsibility of the proponent.
- Preventative measures such as earth embankments will be put up to prevent erosion will be established where appropriate.
- Pit slopes should be profiled to ensure that they are not subjected to excessive erosion but capable of drainage run-off with minimum risk of scour. A professional mining engineer should be employed to ensure that the slopes created are not endangering the lives and wellbeing of the employees that work directly in the pit.
- If necessary, diversion channels should be constructed ahead of the open cuts as well as above emplacement areas and stockpiles to intercept clean run-off and divert it around disturbed areas into the natural drainage system downstream of the mine.
- All mined areas (where works will take place) will be rehabilitated to control erosion and sedimentation.
- Existing vegetation must be retained as far as possible to minimize erosion.

- Rehabilitation of pits and waste dumps shall be planned and completed on a continuous basis in such a way that the run-off water (if any) will not cause erosion.
- Visual inspections shall be done on a regular basis with regard to the stability of water control structures, erosion and siltation (if required).

6.2.5 Groundwater and surface water contamination

The proposed project activities are associated with a variety of potential pollution sources. The main groundwater and surface water contaminants may include chemicals such as heavy metals, organic solvents, hydrocarbons (oil), microbiological contaminants as well as waste water/effluent discharge. Due to the crystalline and metamorphic nature of the targeted lithology on project area, these pollutants are unlikely to pose any negative impacts on the underground water system. However, these contaminants may infiltrate into the ground and pollute the fractured or faulted aquifer on site and with time disperse further groundwater system of the area. Sources of pollution can be categorized into two major types: point source pollution and non-point source pollution. Point source pollution (e.g. leaking mobile toilets and fuel, oil, chemical spillage) is a single identify localized source while non-point source pollution (diffuse sources such as petrochemical pollution) is characterized by multiple discharge point.

Water resources contamination is greatly linked to land and soil contamination. Land contamination is considered contaminated when it contains hazardous materials or oil concentrations above background or naturally occurring levels from anthropogenic activities. When contamination of land is suspected or confirmed during any project phase, the cause of the uncontrolled release should be identified and corrected to avoid further releases and associated adverse impacts. Contaminated lands should be managed to avoid the risk to human health and ecological receptors. The preferred strategy for land de-contamination is to reduce the level of contamination at the site while preventing the human exposure to contamination.

Another source of water contamination is storm water. Storm water includes any surface runoff and flows resulting from precipitation, drainage or other sources. Typically storm water runoff

contains suspended sediments, metals, petroleum hydrocarbons, Polycyclic Aromatic Hydrocarbons (PAHs), coliform, etc. Rapid runoff, even of uncontaminated storm water, also degrades the quality of the receiving water by eroding stream beds and banks. However, it should be noted that the scale and footprint of the activities where potential sources of pollution is likely to occur is relatively small. Therefore the impact will be moderately low, however groundwater is an important resource and must be protected. The proponent has set out various measures to ensure the protection of groundwater quality.

Table 13: Shows the qualitative impact assessment of surface and groundwater.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M/H	M	M/L	H/M	M	M
Mitigated	L	L	L	L	L	L

Mitigation Measures to be enforced:

- Non-toxic and biodegradable drilling lubricant will be used
- No dumping of waste products of any kind in or in close proximity to surface water bodies and possible recharge areas for groundwater.
- Wastewater should not be discharged directly into the environment
- Waste water / contaminated water should be contained for proper disposal.
- Drip trays must be placed underneath vehicles when not in use to contain all oil that might be leaking from these vehicles.
- Project machines and equipment should be equipped with drip trays to contain possible oil spills when operated on site.
- In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of spillages on impermeable floors and bund walls that can contain 110% of the volume of hazardous substances.
- All refueling and any maintenance of vehicles will take place on impermeable surfaces.
- Spill kits will be readily available on site. Employees and/or contractors will be trained to use the spill kits to enable containment and remediation of pollution incidents.

- Environmental awareness for contractor and employees to be included during inductions
- Accessibility to spill prevention and response equipment, such equipment should be visible and accessible to all employees at any given time.
- Avail a spill response action plan in case of accident and any spills will be cleaned up immediately to the satisfaction of the Environmental Manager by removing the spillage together with the polluted soil and by disposing of them at a recognized facility as stipulated in the spill response action plan.
- Designated waste collection tanks should be available on-site and away from waterways, and such isolation should be maintained at all times.

6.2.6 Fire and explosion hazard

All fuel storage and handling facilities as well as fire precautions and fire control measures at the site must comply with strict safety distances as prescribed by SANS 10089. SANS 10089 is adopted by the Ministry of Mines and Energy as the national standard. Hydrocarbons are volatile under certain conditions and their vapors in specific concentrations are flammable. If precautions are not taken to prevent their ignition, fire and subsequent safety risks may arise. Therefore, a holistic fire protection and prevention plan is needed. It must further be assured that sufficient water is available for firefighting purposes. It is important to recognize that a responsive fire prevention plan does not solely include the availability of firefighting equipment, but more importantly, it involves premeditated measures and activities to timeously prevent, curb and avoid conditions that may result in fires. Therefore, an integrated fire prevention plan should be drafted before drilling. In cases where a fire or an explosion takes place on site, the following mitigation measures should be taken to ensure safety of the people and reduce damage to properties.

Mitigation Measures to be enforced

- Sufficient fire extinguishers will be installed on every project vehicle.

- A designated area needs to be identified as an assembly area where personnel meet in case of such incident. All employees, contractors and visitors should be made aware of this area through inductions conducted before entering the site.
- Personnel will be trained on how to use fire extinguishers. A fire and explosive management policy and procedures document for the site should be drafted and review on a regular basis and every employee should know the content of this document so that they can act accordingly when a fire or an explosion breaks out.
- Refresher courses on the content of the fire and management policy and procedure document should be given on a regular basis to ensure that the employees aware and are competent in reacting to such incidents.
- Sufficient fire extinguishers with sufficient length of hosepipes will be made available on site for fire protection.

Table 14: Shows the qualitative impact assessment of fire and explosion hazards.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	L	L	L	M	M	L
Mitigated	L	L	L	L	L	L

6.2.7 Hazardous waste and material management

Hazardous material can be classified according to the hazard as: explosives, compressed gases, including toxic or flammable gases; flammable liquids; flammable solids; oxidizing substances; toxic materials and corrosive substances. These substances are regarded by the Hazardous Substance Ordinance (No. 14 of 1974) as those substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances.

When a hazardous material is no longer usable for its original purpose and is intended for disposal, but still has hazardous properties, it is considered a hazardous waste. In the proposed project, hazardous waste will be collected and sent for treatment before disposal. The total volume of these hazardous materials and chemicals on site is never likely to be substantial and

thus the overall risks during all project phases are not likely to be high. The overall objective of hazardous materials management is to avoid or, when avoidance is not feasible, minimize uncontrolled releases of hazardous materials or accidents (including explosion and fire) during their production, handling, storage and use, this objective can be achieved by:

- ✓ Establishing hazardous materials management priorities based on hazard analysis of risky operations identified through Social and Environmental Assessment;
- ✓ Where practicable, avoiding or minimizing the use of hazardous materials
- ✓ Preventing uncontrolled releases of hazardous materials to the environment or uncontrolled reactions that might result in fire or explosion;
- ✓ Using engineering controls (containment, automatic alarms, and shut-off systems) commensurate with the nature of hazard;
- ✓ Implementing management controls (procedures, inspections, communications, training, and drills) to address residual risks that have not been prevented or controlled through engineering measures.

Table 15: Shows the qualitative impacts assessment of hazardous waste and materials.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	L	L	M	L	L
Mitigated	L	L	L	L	L	L

Mitigation Measures to be enforced

- All chemicals and other hazardous substances must be stored and maintained in accordance with the Hazardous Substances Ordinance (No. 14 of 1974), with all relevant licences and permits to be obtained where applicable.
- Given the potential harm to human health during handling and use of any of hazardous substances it is essential that all staff be trained with regards to the proper handling of these substances as well as First Aid in the case of spillage or intoxication.

- Storage areas for all substances should be bunded and capable to hold 120% of the total volume of a given substance stored on site.
- Job safety analysis to identify specific potential occupational hazards and industrial hygiene surveys, as appropriate, to monitor and verify chemical exposure levels, and compare with applicable occupational exposure standards.
- Hazard communication and training programs to prepare workers to recognize and respond to workplace chemical hazards. Programs should include aspects of hazard identification, safe operating and materials handling procedures, safe work practices, basic emergency procedures, and special hazards unique to their jobs Training should incorporate information from Material Safety Data Sheets for hazardous materials being handled. MSDSs should be readily accessible to employees in their local language.
- Provision of suitable personal protection equipment (PPE) (footwear, masks, protective clothing and goggles in appropriate areas), emergency eyewash and shower stations, ventilation systems, and sanitary facilities.
- Monitoring and record-keeping activities, including audit procedures designed to verify and record the effectiveness of prevention and control of exposure to occupational hazards, and maintaining accident and incident investigation reports on file for a period of at least five years.

6.2.8 Solid waste management

Waste can be generated from contractors, staff members and other visitors to the area. Proper solid waste management will involve full commitment by all the employees and contractors of the site. Solid waste which will be generated from this project if not managed will have an effect on the environment. Given the remote location and the land-use, the dumping of domestic waste within the project area could prove hazardous to wildlife and livestock, as well as impede agricultural production; the assessment will focus on these impacts. The types of waste that

could be generated during operation include hazardous waste, general industrial waste and domestic waste. Domestic waste will be temporarily handled and stored onsite before being removed for final disposal at permitted waste disposal facilities. A registered Waste Management Company would be contracted to remove all hazardous waste from the site. Furthermore, ablution facilities will use chemical toilets and/or sealed septic tanks and the sewerage taken to the Omaruru town periodically.

Mitigation Measures to be enforced:

- Waste generated will be handled in accordance with the contract signed with the landowner. This shall include: waste should be separated and recycled / re-used where possible. Where waste management procedures do not exist, a procedure should be developed.
- Suitable receptacles for waste disposal will be provided at appropriate locations on site. These receptacles will be clearly marked for different waste types.
- Mandatory waste segregated right at the source of waste generation. The collection of segregated waste would be made from the site and amenity areas.
- The project site should be equipped with separate waste bins for general/domestic waste and hazardous waste.
- Employees and contractors will be shown the importance of correct waste disposal as well as waste minimization and recycling.
- Place priority on waste reduction, waste reuse and waste recycling, in that order.
- Sufficient waste storage bins on site and regular emptying of the waste storage bins.
- Strictly, no burning of waste on the site or at the disposal site, as it possesses environmental and public health impacts.
- The collected solid waste should be disposed at registered and approved disposal site agreed upon by both Municipality and the proponent.

Table 16: Shows qualitative impacts assessment for waste management.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	L	H	L	M	M	L
Mitigated	L	L	L	L	L	L

6.2.9 Heritage and archaeological impacts

Potential damage to archaeological sites may be impacted through unintentional destruction or damages are a result of vehicle tracks, footprints and actions of contractors, employees. This may include the excavation of subsurface graves or other archaeological objects. Currently, there is no information provided about known archaeological heritage remains and sites within the project site. Therefore, this impact can be rated medium to low, if there are no mitigation measures in place. All archaeological remains are protected under the National Heritage Act (2004) and will not be destroyed, disturbed, or removed. The Act also requires that any new discoveries archaeological significant objects on the site should not be disturbed, but are to be reported to the project Environmental officer or National Heritage Council offices.

Table 17: Shows heritage impact assessment.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	L	M	L	M	M/H	M
Mitigated	L	L	L	L	L	L

Mitigation Measures to be enforced

- Adhere to practical guidelines provided by an archeologist on site to reduce archaeological impacts.
- The site location where archaeological features might be found should be d marked with flag tape and the GPS coordinates should be recorded.
- Notices/ information boards information will be placed on site.
- The proponent and contractors should be made aware of the provisions of section 55 of the National Heritage act.

- Training employees regarding the protection of these sites in event significant heritage and cultural features are discovered while carrying out exploration activities.
- Obtain appropriate clearance or approval from the competent authority.
- In the event of such finds, all activities must stop and the project management or contractors should notify the National Heritage Council of Namibia immediately.
- The proponent should engage an archaeologist to survey the project site(s) before project commencement.

6.2.10 Visual impacts

Exploration and mining activities leave scars on the landscape and change the aesthetic appeal of the overall area resulting in negative visual impacts. Landscape alteration by off-road driving is a major concern, particularly with regard to uncontrolled use of 4x4 vehicles and quad-bikes. Another process linked to landscape alteration is the excavations of trenches. These scars can contrast the surrounding landscape, and this can potentially cause a visual nuisance to tourists since the project area is near tourists routes. The project is located close to the C36 road that is not only used by local travelers and local holiday makers but tourists too. Tourists are regarded as visual receptors of high sensitivity since their attention is focused on the landscape which they utilize for visual aesthetic appeal. Motorists are generally classified as visual receptors of low sensitivity due to their momentarily dynamic view and experience of the proposed development.

During mine construction and Operation, the main anthropogenic impact from the implementation of the project will be on the landscape component. The mining pit will be discernible from a distance of 1 km, however it does not significantly affect the overall composition of the view as most of the visual receptors will have a view towards development, although vegetation will screen some receptors. A two-stage process of landscape change will occur during project implementation. The first stage will occur during the construction (operation) of the open pit and the key contributing process will be ore mining, which will change the existing landforms. Another process that is linked with landscape alteration is the

construction of site and access roads, stockpiles, waste facilities and production facilities. The proposed closure process will involve a set of activities whose objective will be to improve the environmental and aesthetic value of the affected landscape.

Table 18: Shows visual impacts impact evaluation.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	L	M	M	M	M/H	M
Mitigated	L	L	L	L	L	L

Mitigation Measures to be enforced

- The access road to exploration sites must be established in consultation with the landowner and usage of existing roads shall be enforced.
- The design, construction, and location of access to main roads will be in accordance with the requirements laid down by the controlling authority.
- The proponent should carry out progressive working and restoration/ rehabilitation over the shortest timescale possible, to avoid excessive areas of disturbance.
- When exploration and mining activities cease, restore the visual sense of the area to its natural state for instance all excavations, pits are to be backfilled and drillings holes to be capped when no longer in use.
- Care must be taken to ensure that all rehabilitated areas are similar to the immediate environment in terms of visual character, vegetation cover and topography and any negative visual impacts will be rectified to the satisfaction of the environmental consultant.
- Minimize disturbance to topsoil, keep existing trees, and introduce indigenous plants for re-vegetation.
- All vehicles, equipment and machinery that do not need to be parked within direct sight of the roads, visible to travelers.
- Overburden will be placed back into excavation as part of the rehabilitation programme.
- Restrict off road vehicles and equipment to designated areas.

- Maintain the small shrubs found on the site and only remove vegetation that has an impact on the development.
- Land markings, vehicle tracks, and excavations shall be restored to the original landform and, visual state as much as possible.
- In the case of dual or multiple uses of access roads by other users, arrangements for multiple responsibilities must be made with the other users. If not, the maintenance of access roads will be the responsibility of the holder of the Mining Claims/proponent.

6.2.11 Occupational health, safety and security

Exploration and mining activities are associated with serious health and safety risks to workers on site. The project site safety of all personnel will be the proponent's responsibility and should be adhered to as per the requirements of the Labour act (No11 of 2007) and the Public Health act (No.36 of 1919). The risk of an accident will be high if the dangerous parts of equipment/machineries are exposed and operators are poorly trained or supervised. This increases the possibility of injuries, and the responsible manager must ensure that all staff members are briefed about the potential risks of injuries on site. Occupational exposures are normally related to the dermal contact with fuels and inhalation of fuel vapors during handling of such products. The manager is further advised to ensure that adequate emergency facilities, including first aid kits, are available on site. All Health and Safety standards specified in the Labour Act (No.11 of 2007) should be complied with.

Mitigation Measures to be enforced:

- An emergency preparedness plan should be compiled, emergency medical treatment should be available on site and all personnel appropriately trained to apply first aid when necessary.
- All vehicular equipment operators must have valid licences for that particular vehicle class.

- Ensure that all exploration personnel are properly trained depending on the nature of their work.
- Provide for a first aid kit and a properly trained person to apply first aid when necessary.
- A wellness program should be initiated to raise awareness on health issues, especially the impact of sexually transmitted diseases as described above.
- A wellness program should be initiated to raise awareness on health issues, especially the impact of sexually transmitted diseases, Covid 19, hepatitis etc. Encourage HIV counseling and testing and facilitate access to Antiretroviral (ARV) medication.
- Prevent diseases spread by biological agents by providing proper toilets and cleaning up facilities, proper waste removal, running water and detergent on site.
- Heavy vehicle, equipment and fuel storage site should be properly secured and appropriate warning signage placed where possible.
- Drilled boreholes that will no longer be used or to be used later after being drilled should be properly marked for visibility and be capped/closed off.
- Clearly demarcate the exploration (area of current activities e.g. drilling site) site boundaries along with signage of “no unauthorized access”.
- Clearly demarcate dangerous areas and no-go areas on site.
- Staff and visitors to the exploration site must be fully aware of all health and safety measures and emergency procedures.
- The contractor must comply with all applicable occupational health and safety requirements.
- The workforce should be provided with all necessary Personal Protective Equipment where appropriate.
- The contractor must comply with all applicable occupational health and safety requirements.
- Implement the use of alcohol detectors.
- The outcome of these meeting should be recorded in a form of a report and the proponent needs to address the issues raised in this meeting.

Table 19: Impact evaluation for occupational health, safety and security.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	M	M	M	M	M
Mitigated	L	L/M	L	L	L/M	L

6.3 Socio-economic impacts

6.3.1 Positive Impacts

1. Employment Creation

Local recruitment will be encouraged during the lifespan of the project by the proponent with a target of at least 65% locals. The types of jobs will range from skilled, semi-skilled and unskilled. This operation will contribute to the alleviation of unemployment which is severe due to recent retrenchments caused by Covid-19 economic recession. Employment on the new project will improve the livelihood of people and contribute to the local economy growth.

Enhancement measures:

- The proponent will introduce training programs (bursary schemes, on the job training etc) in order to boost the supply of local skills
- It is proposed that local people community members from surrounding areas should be considered first for employed. Especially where no specific skills are required.
- Gender equality considerations during recruitment process.
- Employment preference will be afforded to previously disadvantaged Namibians.

2. Generation of revenue

According to the law of Namibia, operating companies are to pay taxes. The proponent will pay tax to the government hence this will benefit the nation at large given that money generated from taxes is diverted to the public by the government.

Enhancement measures:

- Continuous payment of taxes due as regulated in the Namibian laws.

6.3.2 Negative Impacts

6.3.2.1 Disturbance of the grazing area

Livestock farming (cattle, goat and sheep) is the major agricultural activity taking place in the project vicinity, because the landscape is unsuitable for crop farming due to its aridity and poor soils. Extended exploration work may pose a threat to grazing pastures for local livestock farming. However, due to low spatial scale of the proposed project, the impact is minimal.

Table 20: Impact evaluation for grazing area disturbance.

Mitigation	Severity	Duration	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	M/H	M	L/M	M/H	M
Mitigated	L	L/M	L	L	L/M	L

- Vegetation found on the site, but not on targeted exploration areas should not be removed but left to preserve biodiversity and grazing land.
- Agree on relevant compensation with landowners where land used for grazing purposes is impacted.
- Workers should refrain from driving off road and creating unnecessary tracks that may contribute to soil erosion and loss of grazing land.
- Any unnecessary removal or destruction grazing land, due to exploration activities should be avoided.
- Environmental awareness on the importance of grazing land for local livestock should be provided to the workers.

6.3.2.2 Socio-economic concerns

- As the movement of staff and contractors to and from the area increases, the risk of spread of HIV/AIDS and other STDs increases;

- Increased influx of jobseekers to the area as people come in search of job opportunities during the operational phase of the project. This could lead to potential increase in the unemployed people in the area and the establishment/growth in informal settlements which could exacerbate security issues due to increased crime rates.
- Impacts on the size and structure of the population. Increased informal settlement and associated problems;
- Negative impact on the health and safety of the surrounding community and workers
- Impact from loss of grazing for domestic livestock in “exclusive use zone”
- Impacts on cultural and spiritual values.
- Demographic factors: Attraction of additional population that cannot benefit from the project.
- Perception of Health and Safety risks associated with exploration.

Mitigation Measures to be enforced:

- The population change can be mitigated by employing people from the local community and encouraging the contractors to employ local individuals.
- Safeguard against the development of illegal settlements around the project area.
- 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.

Methods for monitoring:

- Public meetings will be held by the proponent whenever necessary.

Table 21: Shows the qualitative impacts assessment for socio economic.

Mitigation	Severity	Durati on	Spatial Scale	Consequence	Probability of Occurrence	Significance
Unmitigated	M	L	M	M	M	M
Mitigated	M	L	M	M	L	L

Actions/Mitigation measures:

- Honour agreements set out in the site-access contracts
- Consult and provide feedback regarding activities on the individual properties
- Provide contact details to a designated person, who will serve as liaison between landowners and the exploration teams
- Provide appropriate toilet facilities for the exploration workers on the site or agree with landowner to use certain facilities on the farm.

Municipal Service Impacts

Proposed exploration project will require provision of the following services:

- ❖ Potable water for domestic purposes
- ❖ Temporary toilets
- ❖ Solid waste management
- ❖ Bulk water and power supply

7. Environmental Management Plan (EMP)

7.1 Purpose of Environmental Management Plan (EMP)

Environmental management plan (EMP) serves as a tool that can ensure sustainable mineral exploration, as it contains measures aimed at protecting, rehabilitating and restoring the environment to its productive state before, during and after exploration/mining. It serves as a risk strategy that contains logical framework, monitoring programs, mitigation measures and management control. The aim of an Environmental Management plan (EMP) is to develop procedures to implement project's mitigation measures and monitoring requirements. It is deemed as a risk strategy that contains logical framework and management control strategies to minimize potential environmental impacts to significant level. The EMP ensures the community that the environmental management of the project is acceptable. As well as stipulating the roles and responsibilities of persons involved in the project. An EMP ensures that legal and policy requirements are well known and understood by the proponent, its employees and contractors and will be strictly enforced by its management team. Issues and concerns identified in the EIA will form a set of environmental specifications that will be implemented on site.

The control measures described in this EMP have been developed following consideration of the findings of the Environmental Impact Study (EIS), which concluded that a number of environmental values would be impacted by the proposed exploration activities. The intent of the proposed control measures is to ensure that project related activities will not negatively affect the environment or the health, welfare and amenity of people and land uses by meeting or exceeding statutory requirements.

Overall objectives of this EMP are:

The following overall environmental objectives have been set for proposed mineral prospecting and exploration project on EPL 8841:

- To develop measures that will mitigate the adverse impacts of the proposed project
- Ensuring compliance with regulatory authority stipulations and guidelines
- To formulate measures to enhance the value of environmental components where possible.
- To formulate measures to protect environmental resources as well enhance the value of environmental components where possible.
- Responding to unforeseen events and providing feedback for continual improvement in environmental performance.

Project Phases Covered in the EMP

The following phases are addressed in this EMP:

- (a) Planning phase** - This is the stage of the proposed project during which the Proponent prepare all the administrative and technical requirements needed for the actual works on the ground. The planning includes things like obtaining the necessary permitting and authorization from relevant national and local stakeholders (such as affected communities, traditional authorities, etc.), facilitating the recruitment and procurement processes, etc., in preparation of the exploration activities (and site maintenance).
- (b) Prospecting and Exploration phase** - This is the phase where the proponent will do prospecting and exploration activities for the targeted commodities groups and undertake related activities on site. It is also the phase during which maintenance of the area, equipment and machinery is done by the Proponent. This is also the phase when mitigation measures are implemented, and the monitoring plan put in place.
- (c) Decommissioning, site closure and rehabilitation:**

This is the phase when exploration activities cease as a result of either poor exploration results or loss of market demand for the targeted commodity. Rehabilitation measures will have to put in place during exploration and before decommissioning.

7.1.1 Legal Implications and obligations under the EMP

The EMP will be sent to the Directorate of Environmental Affairs (DEA) of the Ministry of Environment, Forestry and Tourism (MEFT) for approval. Once the DEA is satisfied with the contents of the EMP, they will issue an Environmental Clearance Certificate (ECC) to the Proponent to commence with the exploration in the proposed area. The ECC is linked with the recommendations of the Environmental Management Plan. Once the ECC is issued, the EMP becomes a legally binding document and each role-player including contractors and sub-contractors are made responsible to implement the relevant sections of the EMP and is required to abide by the conditions stipulated in this document. This Environmental Management Plan (EMP) document is designed to meet legal requirements and avoid or minimize the impacts associated with the implementation of the proposed mineral prospecting and exploration on EPL 8841.

7.1.2 Environmental Management Principles

The proponent will ensure that all parties involved in the project uphold the following broad aims:

1. All persons will be required to conduct all their activities in a manner that is environmentally and socially responsible. This includes all consultants, contractors, and sub-contractors, transport drivers, guests and anyone entering the exploration area in connection with the exploration project.

2. Health, Safety and Social Well Being

- ❖ Safeguard the health and safety of project personnel and the public against potential impacts of the project. This includes issues of road safety, precautions against natural dangers on site, and radiation hazards; and,
- ❖ Promote good relationships with the local authorities and their staff.

3. Biophysical Environment

- ❖ Wise use and conservation of environmental resources, giving due consideration to the use of resources by present and future generations;
- ❖ Prevent or minimize environmental impacts;
- ❖ Prevent air, water, and soil pollution, Biodiversity conservation and due respect for the purpose and sanctity of the area.

To achieve these aims, the following principles need to be upheld.

Commitment and Accountability:

The proponent's senior executives and line managers will be held responsible and accountable for: Health and safety of site personnel while on duty, including while travelling to and from site in company vehicles and environmental impacts caused by exploration activities or by personnel engaged in the exploration activities, including any recreational activities carried out by personnel in the area.

Competence

The proponent will ensure a competent work force through appropriate selection, training, and awareness in all safety, health and environmental matters.

Risk Assessment, Prevention and Control

Identify, assess and prioritize potential environmental risks. Prevent or minimize priority risks through careful planning and design, allocation of financial resources, management and workplace procedures. Intervene promptly in the event of adverse impacts arising.

Performance and Evaluation

Set appropriate objectives and performance indicators. Comply with all laws, regulations, policies and the environmental specifications. Implement regular monitoring and reporting of compliance with these requirements.

Stakeholder Consultation

Create and maintain opportunities for constructive consultations with employees, authorities, other interested or affected parties. Seek to achieve open exchange of information and mutual understanding in matters of common concern.

Continual Improvement

Through continual evaluation, feedbacks, and innovation, seek to improve performance regarding social health and well-being and environmental management throughout the lifespan of the exploration project.

Financial Provisions for exploration

In line with Namibia’s environmental rehabilitation policy, the proponent will make the necessary financial provision for compliance with the EMP.

7.2 Organization plan: Roles and responsibilities

The environmental aspects which may be affected by the proposed project have been categorized into negative and positive impacts as an extension of the preceding sections. This section summarizes the objectives, indicators to be observed, schedules to be adhered to and roles and responsibilities of various stakeholders to the EMP.

Table 22: Roles and responsibilities of various stakeholders to the EMP.

Role	Responsibilities and duties
Proponent	<ul style="list-style-type: none"> - Responsible for the management and implementation of the EMP - Ensure environmental policies are communicated to all personnel throughout the proposed project and that employees understand the guidelines of the EMP - Responsible for providing the resources required to complete the project tasks - Appoint a safety health and environment manager and supporting officers, and - Ensure all workers are inducted on safety measures.
Safety Health and	<ul style="list-style-type: none"> - Oversee safety health and environment related activities - Monitor daily operations and ensure adherence by personnel to the EMP

Environment management	<ul style="list-style-type: none"> - Maintain the community issues and concerns register and keep records of complaints, and - Maintain an up-to-date register of employees who have completed site induction. - Receive, recording and responding to complaints - Ensure adequate resources are available for the implementation of the EMP - Ensure safe and environmentally sound operations, and - Responsible for the management, maintenance, and revisions of this EMP
Foreman on duty	<ul style="list-style-type: none"> - Ensure that all contract workers, sub-contractors and visitors to the site are aware of the requirements of this EMP, relevant to their roles and always adhere to this EMP - Report any non-compliance or accidents to the Safety Health and Environment Manager.
Employees	<ul style="list-style-type: none"> - Adhere to measures set out in the EMP - Ensure they have undertaken a site induction, and - Report any operations or conditions which deviate from the EMP as well as any non-compliant issues or accidents to the environmental manager

The table above is summarized below, with the following parties to aid in overseeing that the overall objective of this document is met;

- Management Committee
- Safety Health and Environment Manager
- Safety and Health Officer
- Environmental Officer
- Foreman on duty
- Personnel on duty/ employees

The following table emphasizes the role of each officer in the different management plans discussed in the previous section.

Table 23: Roles and responsibilities of various stakeholders, environmental indicators and objectives.

Objectives	Indicators	Responsibility
To avoid any form of hydrocarbon spills on and around the exploration site	No hydrocarbon spillage or/and remnants of hydrocarbon spillage shall be visible round the project site	SF,PS, ENC
To avoid any form of liter be it paper, metal, plastic and human waste on and around the exploration site	No litter or/and remnants of liter shall be visible around the project site	SF,PS, ENC
To minimize land and soil disturbance	Driving tracks and excavation shall be restricted and only be visible within the project site.	SM, SF, ENC
To protect and conserve fauna and flora within the project area	Minimum levels of habitat disturbance	SM,SF, ENC
To minimize dust generation on site and atmospheric pollution	Emissions/generation particulate content of the dust around the site and gravel roads shall not exceed maximum allowable concentration that may affect human being and animals	SM,SF, ENC
To ensure compliance with statutory requirements	Assurance measures shall be put in place and Periodic inspections aimed at corrective action undertaken, recorded and documented	EC, PP, ENC

Table 24: Implementation of the objectives should be adhered to as indicated in the table.

Objectives	Indicators	Responsibility
To avoid any form of hydrocarbon spills on and around the mining site	No hydrocarbon spillage or/and remnants of hydrocarbon spillage shall be visible around the project site	Personnel on duty, Foreman on duty
To avoid any form of litter be it paper, metal, plastic and human waste on and around the mining site	No litter or/and remnants of litter shall be visible around the project site	All employees, Environmental Officer, safety, Health and Environment Manager.
To minimize land and soil disturbance	Driving tracks and excavation shall be restricted and only be visible within the project site.	Personnel on duty, Foreman on duty and Environmental Officer.
To protect and conserve fauna and flora within the project area	Minimum levels of habitat disturbance	Safety, Health and Environment Manager, Environmental Officer and personnel on duty
To minimize dust generation on site and atmospheric pollution	Emissions/generation particulate content of the dust around the site and gravel roads shall not exceed maximum allowable concentration that may affect human being and animals	Foreman on duty, Environmental Officer and Safety Health and Environment Manager.
To ensure compliance with statutory requirements	Assurance measures shall be put in place and Periodic inspections aimed at corrective action undertaken, recorded and documented	Environmental Manager, Safety Health and Environment Manager.

The following tables gives the mitigation measures to be undertaken during construction, operation, closure and decommissioning phases with the proponent responsible for implementation.

Table 25: Summary of environmental impacts, mitigation measures and monitoring plan for all project phases.

Construction phase			
Environmental impacts	Proposed mitigation measures	Responsibility	Monitoring plan
Air pollution	<ul style="list-style-type: none"> • Regular maintenance of vehicles and equipments. • Brief workers and contractors. • Control speed and operation of construction vehicles. • Regular maintenance of vehicles, construction equipments and heavy machineries. • Provide workers with dust masks. 	Personnel on duty, Foreman on duty and Environmental Officer	<ul style="list-style-type: none"> • Amount of dust produced. • Level of landscaping executed.
Noise pollution	<ul style="list-style-type: none"> • All noise should be kept within reasonable levels. • Employees and neighbors should be notified of any scheduled unusual noise. • Regular maintenance of vehicles, equipments and heavy machinery. • Workers should be provided with personal hearing protection if working in a noisy environment. 	Foreman on duty, Environmental Officer, Safety Health and Environment Manager.	<ul style="list-style-type: none"> • Amount of noise produced
Solid waste	<ul style="list-style-type: none"> • Littering should be discouraged by having strategically placed bins and refuse skips on site. • Recycling plastic, paper and cans should be encouraged on site • The bins should be emptied on a regular basis by the proponent or an independent contractor. • The site should have containers with bulk storage facilities at convenient points to prevent littering. 	Personnel on duty, Environmental Officer and Safety Health and Environment Manager	<ul style="list-style-type: none"> • Presence of dust bins/waste collection points.

Oil leaks and spills	<ul style="list-style-type: none"> • Contactor should have a sealed designated area where maintenance is carried out to prevent percolation of contaminants. • Oil products should be handled carefully on bounded surfaces; in case it leaks. • Vehicles and equipment should be well maintained to prevent oil leaks. 	Personnel on duty, Foreman on duty Environmental Officer and Safety Health and Environment Manager	<ul style="list-style-type: none"> • Absence of oil spills and leaks on site.
First aid	<ul style="list-style-type: none"> • A well-stocked first aid kit shall be maintained by a qualified personnel. 	Safety Health and Environment Manager, Safety and Health Officer.	<ul style="list-style-type: none"> • Contents of the first aid kits.
Visual	<ul style="list-style-type: none"> • Environmental considerations will always be adhered to before clearing roads, trenching and excavation. 	Safety Health and Environment Manager, Environmental Officer	<ul style="list-style-type: none"> • Employees to be trained on how to minimize impacts that can easily be identified with the eye.
Archaeological sites	<ul style="list-style-type: none"> • Buffer zones will be created around the sites. • Adhere to practical guidelines provided by the responsible archaeologist to reduce archaeological impacts of quarrying activities. • All archaeological sites to be identified and protected before development commences. 	All personnel on duty, Environmental officer, Safety Health and Environment Manager	<ul style="list-style-type: none"> • Register of all archaeological sites identified.
Occupational health and safety	<ul style="list-style-type: none"> • Provide personal protective equipments, train workers on personal safety, and how to handle equipments and machines. • A well-stocked first shall be maintained by qualified personnel. • Report any accidents/ incidences and treat and compensate affected workers. 	Safety and Health Officer, Safety Health and Environment Manager	<ul style="list-style-type: none"> • Workers using personal protective equipments. • Availability of a well-stocked first aid box. • Clean sanitary

	<ul style="list-style-type: none"> • Provide sufficient and suitable sanitary conveniences which should be kept clean. 		facilities.
Fauna	<ul style="list-style-type: none"> • Some habitat areas such as the river and tunnel outcrops will be avoided wherever possible. • A fauna survey will be conducted to determine the effect of fragmented habitat to game species should the need arise. • No animals shall be killed, capture or harmed in any way. • No food stuff shall be left lying around as this will attract animals which may result in human-animal conflict. 	Personnel on duty, Environmental Officer, Safety Health and Environment Manager	<ul style="list-style-type: none"> • Regular monitoring of any unusual signs of animal habitat.
Alien invasive plants	<ul style="list-style-type: none"> • Ensure vehicles and equipment are clean of invasive plants and seeds. • Eradicating alien plants using area management plan. • Contain neighboring infestations and restrict movement of invasive plants from adjacent lands • Educating everyone on site on types of invasive plants. 	Environmental Officer, Environmental Manager	<ul style="list-style-type: none"> • Regular monitoring of any signs of alien plants.
Loss of vegetation	<ul style="list-style-type: none"> • Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating. • The movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive area will be avoided. • The movement of vehicles will be restricted to certain tracks only. 	Environmental Officer, Safety Health and Environment Manager	<ul style="list-style-type: none"> • Warning signs on site • Restored vegetation

Operational Phase			
Environmental /Social Impact	Proposed mitigation measures	Responsibility	Monitoring plan
Noise pollution	<ul style="list-style-type: none"> All noise should be kept within reasonable levels. Employees and neighbors should be notified of any scheduled unusual noise. Regular maintenance of vehicles, equipment and heavy machinery. Workers should be provided with personal hearing protection if working in a noisy environment. 	All employees, Safety Health and Environment Manager Environmental Officer	<ul style="list-style-type: none"> Amount of noise produced
Visual	<ul style="list-style-type: none"> Environmental considerations will be adhered to at all times before clearing roads and excavations 	Safety Health and Environment Manager Environmental officer	<ul style="list-style-type: none"> Employees to be trained on how to minimize visual impacts
Fauna	<ul style="list-style-type: none"> Some habitat areas will be avoided where possible. A fauna survey will be conducted to determine the effects of fragmented habitat game species should the need arise. No animal shall be kept, captured, killed or harmed in any way. No food stuff will be left lying around as these will attract animals which may result in human-animal conflict. 	All employees, Environmental officer Safety Health and Environment Manager	<ul style="list-style-type: none"> Regular monitoring of unusual signs of animal habitat.
Alien invasive plants	<ul style="list-style-type: none"> Ensure debris is properly disposed of. Ensure vehicles and equipment are clean of invasive plants and seeds. Contain neighboring infestations and restrict movement of invasive plants from adjacent lands Educating everyone on site on types of invasive plants. Eradicating alien invasive plants by using an area 	Safety Health and Environment Manager Environmental officer Foreman and personnel on duty	<ul style="list-style-type: none"> Regular monitoring of any signs of alien invasive plants

	management plan.		
Loss of vegetation	<ul style="list-style-type: none"> • Environmental considerations will be adhered to at all times before clearing roads, trenching and excavations. • Paths and roads will be aligned to avoid root zones. • Permeable materials will be used where ever possible. • Movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive areas will be avoided and restricted to certain tracks only. 	Safety Health and Environment Manager	<ul style="list-style-type: none"> • Restored vegetation
Solid waste	<ul style="list-style-type: none"> • Minimize solid waste generated on site. • Encourage segregation of waste on site • Debris should be collected by waste collection contractor. • Excavated waste should be piled at a designated approved location. 	Safety Health and Environment Manager Environmental Officer All foremen, personnel on duty	<ul style="list-style-type: none"> • Amount of waste on site. • Availability of dust bins, waste collection point.
Oil leaks and spills	<ul style="list-style-type: none"> • Machinery should be well maintained to prevent oil leaks. • Contractors should have a designated area where maintenance is carried out and should be underlain by impermeable layer. • Workshops should be bounded by concrete 	Environmental Officer, Safety Health and Environment Manager, Foremen, personnel duty	<ul style="list-style-type: none"> • No observed/detected oil spills and leaks on site

Archaeological sites	<ul style="list-style-type: none"> • Buffer zones will be created around the sites. • Adhere to practical guidelines provided by an archaeologist to reduce archaeological impact of quarrying activities. • All archaeological sites to be identified and protected before further quarrying commences. 	Environmental and safety manager	<ul style="list-style-type: none"> • Up to date register of all archaeological sites identified in the vicinity.
First aid	<ul style="list-style-type: none"> • A well-stocked first aid kit shall be maintained by qualified personnel. 	Safety and health Officer, Safety Health and Environment Manager	<ul style="list-style-type: none"> • Contents of the first aid kit.
Fire preparedness	<ul style="list-style-type: none"> • Fire incidence firefighting emergency response plan. • Ensure all firefighting equipments are always available regularly maintained, serviced and inspected. • Fire hazard signs and directions to emergency exit, route to follow and assembly point in case of any. 	Health safety officer Safety Health and Environment Manager	<ul style="list-style-type: none"> • Fire signs put up in strategic places. • Availability of well-maintained firefighting equipments.
Environmental health and safety	<ul style="list-style-type: none"> • Train workers on personal safety and disaster preparedness. • Provide sufficient and suitable sanitary conveniences which should be kept clean. • Conduct annual health and safety audits. • Report any accidents/incidences, treat and compensate affected workers. • A well-stocked first aid kit shall be maintained by qualified personnel. 	Safety Health and Environment Manager	<ul style="list-style-type: none"> • Provide sanitary facilities. • Copies of annual audit.

Decommissioning phase			
Impacts	Proposed mitigation measures	Responsibility	Monitoring plan/Indicator
Noise and air pollution	<ul style="list-style-type: none"> • Personal hearing protection must be worn by workers in noisy section. • Regular maintenance of vehicles, equipments, heavy machinery on regular basis. • Workers should be provided with dust mask to wear at all times. • Decommissioning work can only be carried out during the day. 	Health safety and Environment Manager Environmental Officer	<ul style="list-style-type: none"> • Amount of noise and dust generated
Disturbed physical environment	<ul style="list-style-type: none"> • Undertake a complete a complete environmental restoration programme and introducing appropriate vegetation for ground stabilization. 	Health safety and Environment Manager Environmental Officer	
Solid waste	<ul style="list-style-type: none"> • Solid waste should be collected by contracted waste collection company. • Excavation waste should be used or backfilled • Open pit must be fenced of o avoid animals and unauthorized people from entering. • Waste dumps must be sloped and lined with top soil to allow re-germination of grasses 	Health safety and Environment Manager Environmental Officer	<ul style="list-style-type: none"> • Amount of waste on site. • Presence of well-maintained receptacles and central collection point.
Occupational health and safety	<ul style="list-style-type: none"> • Train workers on personal safety and how to handle equipments and machines. • Provide personal protective equipments (PEE). • A well-stocked first aid kits shall be maintained by qualified personnel. 	Health and safety officer, Environmental Officer,	<ul style="list-style-type: none"> • Workers using protective equipments. • Availability of a first aid box.

	<ul style="list-style-type: none">• Demarcate area under decommissioning.	Health safety and Environment manager	
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7.3 Monitoring, reporting and corrective action

7.3.1 Monitoring of EMP

Monitoring of the EMP performance for the proposed project by the Contractor emphasizes early detection, reporting, and corrective action. It is divided into three parts, namely:

- Monitoring of project activities and actions to be undertaken by the Environmental Coordinator (ENC) appointed by the Contractor.
- The Environmental Coordinator (ENC) shall report all incidents and situations which have the potential of jeopardizing compliance of statutory provisions as well as provisions of this EMP to the Project Proponent.
- The Environmental Coordinator (ENC) shall take corrective prompt measures, adequate and long-lasting in addressing non-compliance activities or behavior.
- To ensure compliance of the Contractor ENC to the implementation of the EMP, it is highly recommended that an External Environmental Expert is appointed by the proponent to ensure the implementation of the EMP.

7.3.2 Inspections and Audits

During the life of the project, performance against the EMP commitments will need to be monitored and corrective action taken where necessary, in order to ensure compliance with the EMP and relevant environ-legal requirements.

Internal Inspections/Audits

The following internal compliance monitoring programme will be implemented:

1. Project kick-off and close-out audits will be conducted on all contractors. This applies to all phases during exploration:

- Before a contractor begin any work, an audit will be conducted by the applicable phase site manager to ensure that the EMP commitments are included in Contractors' standard operating procedures (SOPs) and method statements.
 - Following completion of a Contractors work, a final close-out audit of the contractor's performance against the EMP commitments will be conducted by the applicable phase site manager.
2. Monthly internal EMP performance audits will be conducted during the construction/initial and decommissioning phases.
 3. Ad hoc internal inspections can be implemented by the applicable manager at his/her discretion, or in follow-up to recommendations from previous inspection/audit findings.

External Audits

- At the end of each project phase, and annually during the exploration phase, an independently conducted audit of EMP performance will be conducted.
- Specialist monitoring/auditing may be required where specialist expertise are required or in order to respond to grievances or authorities directives.
- Officials from the DEA may at any time conduct a compliance and/or performance inspection of exploration activities. The proponent will be provided with a written report of the findings of the inspection. These audits assist with the continual improvement of the exploration project and the proponent will use such feedback to help improve its overall operations.

Documentation

Records of all inspections/audits and monitoring reports will be kept in line with legislation. Actions will be issued on inspection/audit findings. These will be tracked and closed out.

Reporting

Environmental compliance reports will be submitted to the Ministry of Environment, Forestry and Tourism on a bi-annual basis.

Environmental management system framework

Environmental Management System (EMS) will be established and implemented by the proponent and their Contractors. This subchapter establishes the framework for the compilation of a project EMS. The applicable manager will maintain a paper based and/or electronic system of all environmental management documentation. These will be divided into policy and performance standards & Enviro legal documentation.

Policy and Performance Standards

A draft environmental policy and associated objective, goals and commitments has been included in the EMP. The project proponent may adapt these as necessary.

Enviro-Legal Documentation

A copy of the approved environmental assessment and EMP documentation will always be available by the proponent. Copies of the Environment Clearance Certificate and all other associated authorizations and permits will also be kept with the exploration team. In addition, a register of the legislation and regulations applicable to the project will be maintained and updated as necessary.

Impact aspect register

A register of all project aspects that could impact the environment, including an assessment of these impacts and relevant management measures, is to be maintained. This Draft EMP identifies the foreseeable project aspects and related potential impacts of the proposed project, and as such forms the basis for the Aspect Impact Register; with the Project Activity. It should however be noted that during the life of the project additional project aspects and related impacts may arise which would need to be captured in the Aspect-Impact Register.

Procedures and Method Statements

In order to affect the commitments contained in this EMP, procedures and method statements will be drafted by the relevant responsible exploration staff and Contractors. These include, but may not be limited:

- Standard operating procedures for environmental action plan and management programme execution.
- Incident and emergency response procedures.
- Auditing, monitoring and reporting procedures, and
- Method statements for EMP compliance for ad hoc activities not directly addressed in the EMP action plans.

All procedures are to be version controlled and signed off by the applicable manager. In addition, knowledge of procedures by relevant staff responsible for the execution thereof must be demonstrable and training records maintained.

Register of roles and responsibilities

During project planning and risk assessments, relevant roles and responsibilities will be determined. These must be documented in a register of all environmental commitment roles and responsibilities. The register is to include relevant contact details and must be updated as required.

Environmental management schedule

A schedule of environmental management actions is to be maintained by the applicable phase site managers and/or relevant Contractors. A master schedule of all such activities is to be kept up to date by the manager. Scheduled environmental actions can include, but are not limited to:

- Environmental risk assessment;
- Environmental management meetings;
- Soil handling, management and rehabilitation;

- Waste collection;
- Incident and emergency response equipment evaluations and maintenance
- Environmental training;
- Stakeholder engagement;
- Environmental inspections and
- Auditing , monitoring and reporting

Change Management

The environmental management schedule must have a procedure in place for change management. In this regard, updating and revision of environmental documentation, of procedures and method statements, actions plants etc. will be conducted as necessary in order to account for the following scenarios:

- Changes to standard operating procedures (SOPs);
- Changes in scope;
- Ad hoc actions;
- Changes in project phase; and
- Changes in responsibilities or roles

All documentation will be version controlled and require sign off by the applicable phase site managers.

7.4 Environmental code of conduct

The Code of Conduct outlined in this section of the EMP applies to, sub-contractors, visitors, permanent and temporal workers. Therefore, anybody within the boundaries of the project site must adhere to the Environmental Code of Conduct as outlined in this section of the EMP. The Environmental Coordinator ENC will implement on-site environmental guidelines and has the authority to issue warnings as well as discipline any person who transgresses environmental rules and procedures. Persistent transgression of environmental rules will result in a disciplinary

hearing and thereafter continued noncompliance behavior will result in permanent removal from the construction sites.

7.5 Site closure and rehabilitation

The closure period will commence once the last planned blocks of lithium ore has been extracted from the pit, at the end of the active mining period. The scope of the proponent site rehabilitation emphasizes the previously removed top soil and overburden rocks to be gently sloped and distributed evenly so that natural vegetation can regrow. It is also required that pits are properly fenced off to avoid unauthorized entry and incidental fall ins of animals. Mine rehabilitation is the process of repairing the damage done by mining activities. Rehabilitation has been planned with a main aim of returning disturbed environment close to its pre mining state. It is also planned to cater for the access road, vehicle tracks around the site, removal, and restoration of areas covered by stockpile and rock piles. The closure vision for the proposed project is to establish a safe, stable and non-polluting post-prospecting landscape that can facilitate integrated, self-sustaining and value generating opportunities, thereby leave a lasting positive legacy.

Site closure and rehabilitation activities

All waste (such as hazardous and domestic) waste will be transported offsite for disposal in licensed landfills in Omaruru town. Disturbed or/and contaminated areas will be cleaned up, treated where necessary and restored to its pristine state.

- Demolition of camping structures.
- Removing of equipment on site.
- Removal of associated infrastructures such as storage tanks, solar panels and heavy-duty generators.

- Where access tracks have been developed in cases where there are no roads, these will be rehabilitated and closed as part of normal closure actions in consultation with landowners.
- Existing secondary roads in the area should be used to prevent damages of the main road.
- The recovered topsoil and subsoil should be utilized to reconstruct the original soil profile.
- All power and water services to be disconnected and certified as safe prior to commencement of any decommissioning works;
- All remaining inert equipment and decommissioning waste will be disposed to the nearest licensed general waste disposal facility;
- Salvageable equipment will be removed and transported offsite prior and during decommissioning;
- All tanks, pipes and sumps containing hydrocarbons to be flushed or emptied prior to removal to ensure no hydrocarbon/chemical residue remains;

The rehabilitation actions intended to be undertaken at the end of the life of the proposed exploration and mining activities are described below.

Remediation of Contaminated Areas

All soil, contaminated with hydrocarbons, will be identified, excavated and disposed in accordance with nearest town council disposal requirements at appropriate sites.

- Removed soils will be managed as determined by the nature and extent of the contamination.
- All equipment in which chemicals have been stored or transported will be cleaned and disposed of in a suitable disposal facility.

Waste Management

Waste management activities will include:

- Hazardous waste will be managed handled, classified and disposed.
- No burring and burying of waste.
- Nonhazardous substances will be disposed in the nearby landfill sites.
- It may be necessary to fence temporary salvage yards for security reasons, particularly where these are located close to public roads.

8. Public Consultation

8.1 Legal framework

Public consultation is an important part of an environmental impact assessment process. Public consultation gives an opportunity to stakeholders or interested members of the public to get more information on the proposed project and to raise any issues or concerns. The Environmental Management Act 2007 and its EIA regulations of 2012 are the tools governing environmental impact assessment in Namibia. Among the important objectives of the Act is to prevent and mitigate the significant effects of activities on the environment by ensuring that interested and affected parties are afforded opportunity to participate throughout the assessment process; and ensuring that the findings of an assessment are taken into account before any decision is made in respect of activities.

In terms of Section 21 of the EIA Regulations, the person conducting a public consultation process must give notice to all potential interested and affected parties by:

- (a) Fixing a notice board at a place conspicuous to the public at the boundary or on the fence of the site where the activity to which the application relates is or is to be undertaken;
- (b) Giving written notice to:
 - (i) The owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site;
 - (ii) The local authority council, regional council and traditional authority, as the case may be, in which the site or alternative site is situated;
 - (iii) Any other organ of state having jurisdiction in respect of any aspect of the activity;and
- (c) Advertising the application once a week for two consecutive weeks in at least two newspapers circulated widely in Namibia.

In line with the provisions of the regulations, the public notices (attached) were published in the local newspapers during the months of August 2022 for three weeks, from 3 to 18 August. The public consultation process started on July 2022 in conjunction with mining claims 70515 & 70516 public consultation process, mining claims 70515 & 70516 are hosted in EPL 8841. The closing date for registration and submission of written objections, comments, inputs to EPL 8841 environmental assessment process was 24 August 2022. The EIA Regulations clearly state that potential interested and affected parties must be provided with a reasonable opportunity (21 days) to comment on the application under Section 21(6) of the EIA Regulations, which was provided.

A stakeholder's register as shown in Table 27 was created on the 30th of May 2022. Minera Xplore Consultancy CC carried out a public meeting for the two mining claims (70515 & 70516) on (09 July 2022) at : !Oe-†Gan Traditional Authority, Community Hall in Okombahe. The meeting's attendance register, minutes and photos are annexed to this report. These two claims are within EPL 8841 and the public meeting comments were incorporated in this report.

The public were invited through the newspaper advertisements (annexed to this report) to submit written comments / inputs / objections on the proposed minerals exploration activities, however no comments / inputs / objections were received on the proposed mineral prospecting and exploration project on EPL 8841. The back ground information document (BID) annexed to this report was provided to the entire registered stakeholder and to all identified I&APs, so far no submissions was received.

Table 26 (a): Register of Organs of State as per section 22(c) of the EIA regulations of 2012.

No.	Name	Position	Organization
1	Teofillus Ngitila	Executive Director	Ministry of Environment, Tourism and Forestry
2	Timoteus Mufeti	Environmental Commissioner	Ministry of Environment, Tourism and Forestry
3	Maria Amakali	Director: Water Resources	Ministry of Agriculture, Water and

		Management	Land reform
4	Erasmus Shivolo	Mining Commissioner	Ministry of Mines and Energy
5	N P Du Plessis	Senior Environmentalist	NamWater

(b)Registered stakeholders (register was made available from 30 May 2022).

No.	Name	Affiliation	Contact Details
1	Mr Allan Gurirab	Daure Daman Traditional Authority	Contact no. : +264 855 29 692
2	Benjamen Howaseb	Daure Daman Traditional Authority	Contact no. : +264 81 8576 560
3	Ivano Sima		Contact no. : +264 81 3939 670
4	Elina Hamatwi Lumbu	Roads authority	lumbue@ra.org.na
5	Chief Seibeb	Daure Daman Traditional Authority	Contact no. : +264 81 330 983
6	Jaco Swart	Rent-A-Drum Commercial Manager	cm@rent-a-drum.com.na
7	Thomas Rathenam		tirathenam@hotmail.com

8.2 Public and Stakeholder Consultation Outcomes

Concerns and comments raised by interested parties as follows:

Allan Gurirab and Benjamen Howaseb from !Oe-#Gan Traditional Authority

- Mr Allan Gurirab and Benjamen Howaseb vowed to engage the community and in particular those that are likely to be affected by the projects and have them submit comments if any.

Thomas Rathenam

- I promote sustainable business in Namibia and has about 8 -10 years in mining and more than 20 years post articles of traineeship. I hold a B Compt Honours degree and an MBA. I am particularly interested in your mining plan and the specifics of your planned spend on rehabilitation.

Jaco Swart: Rent-A-Drum Commercial Manager

- Rent-A-Drum currently have a presentation in Uis and do AfriTin Waste. Please feel free to ask us any waste related questions.

Elina HamatwiLumbu from Roads authority

- Any exploration within 30m on either side of the road permission needs to be obtained from the Roads Authority.
- If drilling will have an effect on the layers of the road), permission should be obtained from the Roads Authority.

The information given below was shared the concerned parties to shade more light in response to concerns raised:

- Entry only with Knowledge and permission of the landowner.
- Initial stages: thematic mapping to delineate various land use zones and patterns to help improve the multiple land use practices and promote coexistence for all the possible land use options.
- In the initial stages: mainly desktop studies (aerial geophysics, remote sensing and Landsat images interpretations) supported by probably 1- or 2-days field verifications.
- Once more information on target areas has been obtained frequent field target verifications: mapping/ sampling visits/ trenching/ drilling, but this will only be over specific areas of interest and not the entire project area.
- The only parts to be physically visited are areas of interest and this tends to be a localized involving only small area where mineralization occurs.
- Field verifications of targets will only be done with the permission and knowledge of the landowner.
- A land/farm access Agreement will be negotiated between the Proponent and the landowner (s) stipulating conditions of access.

- The land access agreement will include among other important issues such as adherence to Environmental Management Plan which focuses on environmental mitigation measures.
- EMP will cover issues raised by interested and affected parties (I&APs)
- The project can only advance in to mining if resources of economic potential are discovered.
- Statistics shows that the likelihood of any EPL to advance to a mining stage is less than 0.01 or 1% .
- If the exploration activities were to advance to mining stage, it's a process that would take time (on average up to 10 years) and landowners as well as I&APs will be consulted throughout the whole development process.
- If the proposed exploration activities lead to a discovery of a mineral resource of economic potential, prefeasibility and feasibility studies will then be carried out over the local area hosting the mineralization.
- During the prefeasibility and feasibility studies, a detailed site-specific Environmental Impact Assessment (EIA) study will be carried out and an Environmental Management Plan (EMP) report will be prepared and these will be done in consultation with all interested and affected parties including the landowner.
- If a deposit of economic potential was to be discovered, the benefits would be big. It would boost the economy of the constituency and it will better the livelihood of many people in the region

9. Conclusion

The proponent provisionally acquired mineral rights on Exclusive Prospecting License (EPL8841), from the Ministry of Mines and Energy (MME). Therefore, the proponent intends to carryout exploration activities on EPL 8841 for lithium on Cape-Cross-Uis lithium-cesium-tantalum (LTC) pegmatites. The proposed exploration activities will run for three years subject to a two year renewal if the prospects are favorable. The proponent plans to implement these activities as soon as the clearance certificate has been issued of operation and this include: geophysical surveys, geochemical survey, geological mapping, trenching, drilling and geochemical sampling as well as laboratory analysis aimed discovering mineral resources of economic interest. Once the deposit proves to be economically feasible, conventional small scale open pit mine development will proceed. Potential positive and negative impacts of the proposed exploration and mining activities on the EPL8841 were identified assessed, and mitigation measures are provided in the EMP. These mitigation measures and recommendations provided are deemed sufficient to minimize the identified impacts to acceptable levels.

The Environmental Management Plan should be used as an on-site reference document during all phases of the proposed project, and auditing should take place in order to ensure compliance with the EMP of the proposed project. Parties responsible for transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken. Overall, the severity of potential environmental impacts of the proposed project activities on the receiving environment (physical, biological, socioeconomic environments and ecosystem functions) will have low probability of occurrence, localized extent, and low magnitude and temporally duration. This report should be viewed as a framework for integrating mitigation measures and applicable legal tools to ensure both compliance and sustainability. It is therefore very important that the proponent provides adequate support for human and financial resources, for the implementation of the proposed mitigations and effective environmental management during the planned activities.

10. Recommendations

The proposed operations is considered to have, overall low negative environmental impacts and potential for the enhancement of socio-economic benefits provided all protocols including the proposed mitigation measures are adhered to .It is therefore recommended that the mineral prospecting and exploration activities on Exclusive Prospecting License (EPL8841), be granted an Environmental Clearance Certificate, provided that: All mitigations provided in this EMP should are implemented as stipulated and where required and emphasized, improvement should be effectively put in place. The Proponent and all their workers comply with the legal requirements governing this type of project and its associated activities.

In a summary the following are to be observed to:

- The proponent should take all the necessary actions to implement the EMP to minimize adverse impacts on the environment.
- The proponent should take responsibility for ensuring that all contractors and employees are fully informed of the EMP provisions, guidelines and legislative requirements and must ensure that adequate insurance cover is in place prior to entry.
- The environmental risks associated with all mineral prospecting and exploration activities on EPL 8841 should be considered and planned for. Best practice procedures should be implemented to minimize any environmental impact and these procedures should be clearly outlined and communicated to all contractors and employees prior to commencing any activity.
- There should be full consideration and close liaison with relevant landowners and regulatory authorities. The proponent is required to give advance notices and obtain permission to have access from the landowners.
- The exploration and activities should be conducted in line with the EMP, thus implementing the necessary mitigation measures, monitoring and stipulated rehabilitation measures.

- In a case where portable water is discovered during boreholes drilling operations, the proponent shall support other land users in the area in terms of access to freshwater supply for both human consumption, wildlife and agricultural support as may be requested by the local community / landowners/s. Relevant underground water abstraction permit/s be obtained from the Ministry of Agriculture, Water and Land Reform (MAWLR) and abstraction and monitoring conditions thereof be observed.
- Any damage to vegetation, land surface or landowner property that may occur as a result of exploration should be corrected without undue delay.

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Appendix A: Registered IAP's

Name	Organization	Tel	Email
Allan Gurirab	Dâure Daman Traditional Authority	+264 855 29 692	
B. Korhs	Earth life Namibia	061-2022041	earthl@iway.na
C. Sisamu	Nampower	061-2052350	Calvin.Sisamu@nampower.com.na
Benjamen Howaseb	Dâure Daman Traditional Authority	+26481 8576 560	
Chief Seibeb	Dâure Daman Traditional Authority	+264 81 330 983	
C. Tubalike	MURD	061-2975062	ctubalike@murd.gov.na
Coleen Mannheimer	061-2022021	manfam@iafrica.com.na	
E de Paauw	Roads Authority - Specialized road Legislation, Advise & Compliance	061-2847027	dePaauwe@ra.org.na
E Muremi	Ministry of Health and Social Services Director Khomas Region	061-2035001	Elizabeth.Muremi@mhss.gov.na
E. Shivolo	Min. of M&E - Mining Commissioner	061-2848111	Erasmus.Shivolo@mme.gov.na
Esmeralda Strauss	CHIEF FORESTER National Botanical Research Institute (NBRI)	061-2022017	Esmeralda.Strauss@maf.gov.na
F Kreitz	Namibian Environment and Wildlife Society - Media, website and newsletter	061-306450	Information@NEWS-Namibia.org;
F. Sikabongo	MET - Deputy Director of Directorate of Environmental Affairs	061-2842701	frederick.Sikabongo@met.gov.na
Fransiska Nghitila	NWR-Environmental and Compliance Specialist	061-2857190	Fnghitila@nwr.com.na; fnghitila@gmail.com
Elina Lumbu	H Roads authority		<u>lumbue@ra.org.na</u>

Jaco Swart	Rent-A-Drum Commercial Manager		cm@rent-a-drum.com.na
Sonja Loots	Manager: Threatened Plants Programme, National Botanical Research Institute	061-2022014	Sonja.Loots@mawlr.gov. na sonja.loots.solo@gmail.c om
Thomas Rathenam			tirathenam@hotmail.com

Appendix B: Proof of Advertisements, Letters and Notices

Appendix C: CV of EAP

Appendix D: BID