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**APP: 004528**

**APPLICATION FOR THE RENEWAL OF ENVIRONMENTAL  
CLEARANCE CERTIFICATE FOR EPL 5496 LOCATED AT  
GROOTFONTEIN DISTRICT OTJOZONDJUPA REGION**



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## DOCUMENT INFORMATION

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|--|--|
| <b>Document Status</b>   | <b>Final</b>   |
| <b>Application Number</b>  | <b>APP: 004528</b>   |
| <b>Project Title</b>   | Renewal Of Environmental Clearance Certificate for EPL 5496 Located at Grootfontein District Otjozondjupa Region |
| <b>Proponent</b>   | Huab Energy Pty Ltd  |
| <b>Location</b>  | Grootfontein District, Otjozondjupa Region   |
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| <b>Aim</b>   | <b>RENEWAL</b> of Environmental Clearance Certificate  |
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## **ACRONYMS**

|              |  |
|--------------|--|
| <b>AIDS</b>  | Acquired Immune Deficiency Syndrome            |
| <b>DEA</b>   | Department of Environmental Affairs            |
| <b>ECC</b>   | Environmental Clearance Certificate            |
| <b>EIA</b>   | Environmental Impact Assessment                |
| <b>EMA</b>   | Environmental Management Act (No. 7 of 2007)   |
| <b>EMP</b>   | Environmental Management Plan                  |
| <b>EPL</b>   | Exclusive Prospecting: License                 |
| <b>HIV</b>   | Human Immune Virus                             |
| <b>MAWLF</b> | Ministry of Agriculture, Water and Land Reform |
| <b>MEFT</b>  | Ministry of Environment Forestry and Tourism   |
| <b>MME</b>   | Ministry of Mines and Energy                   |
| <b>OML</b>   | Otavi Mountain Land                            |
| <b>RC</b>    | Reverse Circulation                            |
| <b>RDC</b>   | Red-Dune Consulting CC                         |

## EXECUTIVE SUMMARY

### (a) Proponent

Huab Energy (Pty) Ltd is a mining and exploration company registered in Namibia whose main exploration focus is for base, rare and precious metals in the Otavi Mountain Land (OML). The company holds the Exclusive Prospecting License (EPL) 5496. The company has been undertaking exploration activities since August 2018.

### (b) Renewal of Environmental Clearance Certificate

Mineral exploration is a listed activity under the Environmental Management Act (Act No. 7 of 2007) (EMA) that may not be undertaken without an Environmental Clearance Certificate (ECC). The company was initially issued with an ECC in August 2018 and expired in August 2021.

In accordance with EMA, the ECC is valid for a period of three years and Section 56 of EMA provides for the renewal of the ECC. The company renewed its ECC in September 2021 and this ECC is now due to expire in September 2024. Accordingly, the company is hereby applying for the renewal of the ECC that is due to expire in September 2024.

### (c) Summary of exploration activities

The summary of exploration activities since 2018 is provided in **Table 1** below.

**Table 1.** Summary of Exploration on EPL 5496

| Program                               | Farm(s) | Details               | Remarks                                 |
|---------------------------------------|---------|-----------------------|---|
| Brocken Ore stockpile sampling        | Abenab  | 154 samples collected | Samples analysed by Genalysis_Australia |
| Channel Sampling – Abenab Underground | Abenab  | 169 samples collected |   |
| Abenab Tailing sampling               | Abenab  | 342 samples collected | Samples analysed by Genalysis_Australia |

|                            |        |  |   |
|----------------------------|--------|--|---|
| Bulk sampling              | Abenab | 8 Ton bulk sample                              | Metallurgical test work Dispatched to Generous metals (China) |
| Abenab Volumetric survey   | Abenab | 130,000 Tons Brocken ore & 100,000ton tailings | Abenab Tailings<br>Abenab rock stockpile                      |
| Abenab Diamond RC Drilling | Abenab | 2000   | Samples analysed by Genalysis _Australia                      |

**(d) Period under review September 2021 - August 2024**

The company did not undertaken exploration during the period under review. Rather, the is continuing with analysing the collected samples.

**(e) Submission of bi-annual reports**

Bi-annual reports report detailing undertaken activities are submitted to the office of the Environmental Commissioner, which forms the basis of this application.

**(f) Conclusion**

The company continues to undertake its exploration activities in accordance with the EMP. There has not been complains of the company activities by farm owners nor by public. This EMP is updated based on omission since the during the reporting period, no exploration activities has taken place.

**(g) Recommendation**

It is recommended to the approving authority to renew the ECC for EPL 5496.

## 1. Introduction

The proponent, Huab Energy (Pty) Ltd was granted the Exclusive Prospecting License EPL 5496 as per the Mineral Resource Act 1992. Exploration activity is a listed under Environmental Management Act (Act No. 7 of 2007) (EMA), that may not be undertaken without an Environmental Clearance Certificate (ECC).

The company was initially issued with an ECC in August 2018. In accordance with EMA, the ECC is valid for a period of three years and Section 56 of EMA provides for the renewal of the ECC. The ECC renewal has been as follows (**Table 2**).

**Table 2.** History is ECC application for EPL 5496

| No | Date of issue  | Expiry date    | Renewed date                    | Annexure       |
|----|----------------|----------------|---------------------------------|----------------|
| 1. | August 2018    | August 2021    | September 2021                  | <b>Annex 1</b> |
| 2. | September 2021 | September 2024 | Current application for renewal | <b>Annex 2</b> |

In accordance with Section 56 of EMA, this document forms part of the application for the renewal of ECC for EPL 5496. This BID summaries activities that were undertaken under the review period. An updated Environmental Management Plan will be submitted.

## 2. Overview of the project

### 2.1. Location & Geology

The EPL is in Grootfontein district of Otjozondjupa region in an area commonly known as Otavi Mountain Land, 25km North East of Grootfontein on M73 via B8 (**Figure 1, Table 3**). It measures 1284.87 hectares (ha) in size with a length of 23.7km. It is covering two commercial farms (Abenab 707, Vanadia 560) where land use is mainly agricultural, of which cattle farming is prominent.



**Table 3.** Coordinates of EPL 5496

| Point | Latitude    | Longitude  |
|-------|-------------|------------|
| 1     | -19.3075791 | 18.0458164 |
| 2     | -19.2970677 | 18.0422366 |
| 3     | -19.2726139 | 18.1163258 |
| 4     | -19.2839970 | 18.1158890 |



**Figure 1.** Location of EPL 5496

The EPL covers the exhausted Abenab vanadium deposit and historic Abenab Mine which was established in 1921 and closed 1958. These mine, hosted in the Auros Formation limestones (uppermost Abenab Subgroup), has been known to be largest concentration of vanadate ore in the world.

## 2.2. Historic Environmental Management

The area has been subjected to exploration and mining on large and small scale for more than a century, with virtually all the reported deposits and occurrences prospected and explored in the

1900s. The area has received sporadic pollution by past mineral processing and extraction activities. All disused mine shafts within the license area have been sealed off as a precautionary measure (**Figure 2**).



**Figure 2.** Fenced of historical shaft ,Abenab \_EPL 5496

The license area incorporates the historic Abenab Mine (V, Pb, Zn) and incorporates the historic Abenab (V, Pb, Zn), (Figure 2), which were operational mines in the middle years of the 20th century. There is no other evident damage to the environment from current and previous exploration or mining activities outside of these historic mining centres.



**Figure 3.** Abenab open pit within EPL 5496

### **3. Huab Energy Exploration activities**

#### **3.1. Period August 2018-December 2018**

The following exploration activities took place between August 2018 – December 2018. Broken Ore stockpile sampling, Chanel Sampling in the Abenab Underground Channel, Abenab Tailing sampling, Bulk sampling, Abenab Volumetric survey from Abenab tailing and rock stockpile (**Figure 4**). The bi-annual and rehabilitation reports detailing undertaken activities were submitted, and forms the basis of the application of renewal.

#### **3.2. Period January-December 2019**

During 2019, exploration activities that were undertaken includes. Bulk sampling Abenab, Broken Ore Stockpile, Bulk Sampling Abenab, Tailings auger sampling. Drilling was done by Diamond RC Drilling. After collecting drill samples, the drilled hole is covered up and marked (**Figure 5**).

#### **3.3. Period January 2020– September 2021**

During this period **no** exploration activities took place, hence the state of the environments remained the same. Because of this, there were no bi-annual reports produced. This was officially communicated to your good office.

#### **3.4. Period September 2021– August 2024 (Period under review)**

No exploration activities were undertaken on the EPL. However, the company has been analysing geological samples collected on the EPL between 2018 – 2021.



**Figure 4.** Bulk Sampling from Historical Stock Piles of the Abenab Mine



**Figure 5.** Shallow Drilling



Figure 6. Diamond Core Drilling and Core samples (Safety signs were observed)



**Figure 7.** Drilling sites and Channel Line around the old Abenab open cast.

### **3.5. Waste management**

All refuse such as, bottles, tins, paper, and plastic, were collected from active sites, sealed, and removed from the area on a weekly basis and deposited within the Grootfontein town municipal waste site. The exploration personnel were accommodated off the license area at Kombat Camp. Very little domestic refuse was therefore generated from the active areas and dumped at Grootfontein dumpsite. The license area was left clean after the drilling exploration programme during the period under review.

### **3.6. Exploration Infrastructural Development**

There are no major infrastructural developments set up within the license area. Exploration personnel are housed in Kombat settlement.

### **3.7. Water**

Water for drilling are abstracted from the existing farm boreholes and the Abenab Open Pit.

## **4. The Environmental Management Plan**

### **4.1. Purpose of the EMP**

The Environmental Management Plan (EMP) is a risk strategy that contains logical framework, monitoring programme, mitigation measures, and management control strategies to minimize environmental impacts. It further stipulates the roles and responsibility of persons involved in the project. These strategies are developed to reduce the levels of impacts for the projects.

### **4.2. Compliance to the EMP**

This EMP is a legally binding document as given under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). The proponent and its contractors must adhere to the framework of this document.

### **4.3. Roles and Responsibilities**

#### **4.3.1. Proponent**

The proponent, shall take overall responsibility for proper implementation of the EMP. It remains the responsibility of the proponent to appoint key personnel for the implementation of the EMP.

The proponent must therefore;

- Appoint a site Manager;
- Ensure employees understand the guidelines of the EMP;
- Ensure the EMP is well explain to Contractors;
- Ensure safer working environment;
- Provide workers with Personal Protective Clothing;
- Ensure the environment is protected and;

In events where the proponent hires or subcontract contractors for the job, the proponent must ensure that the contractor is in position to execute the mandate of the EMP;



#### 4.3.2. Environmental Compliance Officer (ECO)

Compliance to EMP is enforce by the environmental inspector as provided for under Environmental Management Act (No. 7 of 2007) (EMA). Hence the Environmental Compliance Officer (ECO) is an individual appointed as an environmental inspector under EMA. Depending on his/her work schedule, the ECO shall visit the site at any time for environmental inspection and monitoring.

#### 4.3.3. Site Manager

The Site Manager (SM) represents the proponent on site. He/she shall be responsible for daily activities in ensuring environmental protection. All communication about the implementation of EMP must be channelled through the SM.

#### 4.3.4. Employees

It shall be responsibility of employees to adhere to the provision of EMP. At all times when on site, employees are expected to ensure their safety by wearing personal protective equipment clothing, report worn out PPE and request for replacement.

### **4.4. Disciplinary Action**

#### 4.4.1. Proponent

The EMP is a legally binding document, non-compliance to the EMP is punishable upon conviction under EMA. Amongst others, legal action, fines and suspension of work or both.

#### 4.4.2. Workers

Workers found contravening the EMP must be disciplined by the proponent such as written warning.

## 5. Policy, Legal and Administrative Framework

Regulatory framework applicable to the project

| Legislation  | Summary  | Applicability to Assessment  |
|--|--|--|
| <b>The Namibian Constitution</b>                         | The State shall actively promote and maintain the welfare of the people by adopting policies aimed at ... The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future | Protection of the environment and biodiversity. Ensures that these principles are enshrined in the EIA documentation                             |
| <b>Environmental Management Act No. 7 of 2007</b>        | To promote sustainable management of the environment and the use of natural resources and to provides for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters   | The Act provides a list of activities that may not be undertake without an environmental clearance certificate to prevent environmental damages. |
| <b>Mineral Resource Act, Act 1992.</b>                   | Prospecting and Mining of Mineral in Namibia and Issuance of all Permits.  | Issuance of Mining permits   |
| <b>Draft Pollution Control and Waste Management Bill</b> | This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management.   | To protect the Environment from possible hydrocarbons and oil leaks from the machinery, trucks and vehicles.                                     |

| Legislation   | Summary   | Applicability to Assessment  |
|---|---|--|
| <b>Environmental Policy framework (1995)</b>  | This policy subjects all developments and project to environmental assessment and provides guideline for the Environmental Assessment.  | Consideration of all possible impacts and incorporate them in the development stages                       |
| <b>Regulations Related to the Health and Safety of Employees at Work. Reg No. 156</b> | Promotes the Safety and Health of employees at the work place   | To ensure employees health and safety at work  |
| <b>Public Health Act No. 36 of 1919</b>   | To Protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health. | To ensure that the project is not a nuisance to land owners and the public at large                        |
| <b>Labour Act No. 11 of 2007</b>  | This Act outlines the labour laws which encompass protection and safety of employees at work.   | Fair labour practises to be observed about this act  |
| <b>Water Act No, 54 of 1956</b>   | All water resources belong to the State. It prevents pollution and promotes the sustainable utilization of the resource   | Prevention of discharging contaminated water at unauthorised places  |
| <b>Soil Conservation Act No. 76 of 1969</b>   | To promotes the conservation and compacting of soil erosion   | Uncontrolled movement of heavy vehicles and truck at areas surrounding the site may cause land degradation |

| Legislation  | Summary   | Applicability to Assessment   |
|--|---|---|
| <b>Water Resource Management Act No.11 of 2011</b>         | The Act stipulates the prevention of pollution for Surface and Ground water sources.  | Oil spillage coming from machinery requires proper monitoring.  |
| <b>Public Health Act no. 36 of 1919</b>                    | The Act gives provision for the protection for the health of all people.  | The noise and dust level emanating from the project could affect the surrounding community and vegetation in the vicinity.        |
| <b>National Heritage Act No.27 of 2004</b>                 | The Act gives provision of the protection and conservation of places and objects with heritage significance.  | The chance find of Human Remains due to colonial history or crime, Artefacts, and or heritage materials within the EPL            |
| <b>Minerals (Prospecting and Mining) Act No 33 of 1992</b> | Section 50 (i) requires “an environmental impact assessment indicating the extent of any pollution of the environment before any prospecting operations or mining operations are being carried out and an estimate of any pollution, if any, likely to be caused by such prospecting operations or mining operations” | The proposed activity is prospecting for minerals, hence it requires an EIA to be carried out and adhere to the act’s provisions. |

## 6. The EMP Tables Mitigation Measure and Commitments

Red-Dune reviewed the EMP and the gaps /comments are provided in red.

| Environmental /<br>Social Impact | Objectives  | Proposed Mitigation Measures  | Monitoring Indicator  | Party Responsible |
|----------------------------------|---|---|---|-------------------|
| <b>Access to farms</b>           | To avoid conflict between farmers and Huab Energy   | <ol style="list-style-type: none"> <li>1. Inform farm owners well in advance before any planned activities</li> <li>2. <del>All COVID-19 measures must be implemented (wearing of mask and hand sanitizers)</del></li> </ol>  | Recorded conflict<br>Physical inspection  | Site Manager      |
| <b>Induction</b>                 | To ensure that all employees are familiar with the requirements of the EMP                            | <ol style="list-style-type: none"> <li>1. All employees must go through an induction course for the provision of the EMP.</li> <li>2. Staff operating specialised equipment and heavy vehicle must be properly trained</li> </ol>   | Induction Minutes, report and Attendance Register                                   | Site Manager      |
| <b>Employment</b>                | Although significant employment is not expected, the proponent must abide to the relevant labour laws | <ol style="list-style-type: none"> <li>1. Ensure that all general work is reserved for local people unless in circumstances where specialized skills are required.</li> <li>2. Where possible, procure materials from local suppliers</li> <li>3. Fair compensation and labour practise as per Namibian Labour Laws must be followed</li> </ol> | Employees records and their nationalities<br>Labour unrest over unfair compensation | Site Manager      |

| Environmental / Social Impact           | Objectives   | Proposed Mitigation Measures  | Monitoring Indicator   | Party Responsible |
|---|--|---|--|-------------------|
|   |  | 4. Ensure skill transfer to the locals  |  |                   |
| <b>HIV/AIDS, Alcohol and Drug abuse</b> | To sensitise employees about the danger of alcohol, drugs and HIV/AIDS | <ol style="list-style-type: none"> <li>1. Provide awareness to the employees on danger of alcohol, (HIV/AIDS) and drug abuse</li> <li>2. Provide Condoms at on camp sites</li> </ol>  | Awareness meeting minutes  | Site Manager      |
| <b>General Safety</b>                   | To ensure good health and safety for the employees and public          | <ol style="list-style-type: none"> <li>1. Abide by the Occupational Health and Safety and Labour Act of Namibia and other statutory requirement such as International Labour Practise (ILO)</li> <li>2. Develop a health and safety plan / policy</li> <li>3. Ensure that every employee went through an induction course about safety;</li> <li>4. Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Earmuff etc;</li> <li>5. During operation, minor accidents are eminent, hence there must be a first aid kit;</li> </ol> | Induction Minutes<br>Valid driver licenses for heavy vehicles<br>Complain of health issues by employees<br>PPE for all employees | Site Manager      |

| Environmental /<br>Social Impact | Objectives             | Proposed Mitigation Measures  | Monitoring Indicator                      | Party Responsible |
|----------------------------------|------------------------|---|---|-------------------|
|                                  |                        | <ol style="list-style-type: none"> <li>6. Only qualified and licenced personnel must be allowed to operate machinery and vehicles;</li> <li>7. No employee must be allowed to be onsite without PPE;</li> <li>8. Adequate safety signs must be displayed on site;</li> </ol>  |   |                   |
| <b>Fire Risks</b>                | To prevent field fires | <ol style="list-style-type: none"> <li>1. Unauthorised fire shall not be permitted on site</li> <li>2. There must be clear safety signs at designated sites such as, NO SMOKING “DANGER”, “ENTRANCE PROHIBITED” etc</li> <li>3. Smoking is only permitted at designated sites with low risk to fire;</li> <li>4. There must be adequate and suitable fire-fighting equipment which must be well inspected at all time;</li> <li>5. There must be clear signs of high risk fire areas;</li> <li>6. There must be an emergency team to respond to fire eventualities</li> </ol> | Farm complaint<br>Reported fire incidence | Site Manager      |

| Environmental /<br>Social Impact | Objectives                              | Proposed Mitigation Measures  | Monitoring Indicator  | Party Responsible |
|----------------------------------|---|---|---|-------------------|
| <b>Health</b>                    | To ensure good health for the employees | <del>1. Implement COVID-19 preventative measures</del><br>2. Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours.<br>3. Adhere to the Labour act, non-toxic human dust exposure levels may not exceed 5mg/m <sup>3</sup> for respiratory dust and 15mg/m <sup>3</sup> for total dust.<br>4. Supply clean drinking water to the site, such as portable water tank;<br>5. There must be suitable, clean and user-friendly ablution facilities.<br>6. Ensure that supervisor has gone through occupational health and first aid course,<br>7. Train employee on hazard and risk avoidance<br>8. Provide insect repellent, mosquito nets and if necessary immunization to prevent deadly diseases such as malaria | Health complaints from employee and employees fitness certificate | Site Manager      |



| Environmental /<br>Social Impact | Objectives  | Proposed Mitigation Measures   | Monitoring Indicator                | Party Responsible |
|----------------------------------|---|--|-------------------------------------|-------------------|
|                                  |   | 9. All employees must be in possession of the health certificate and screened for communicable diseases such as TB.<br>10. Appoint a cleaner or rotate cleaning responsibilities among workers to ensure clean ablution facilities<br>11. Separate Male and female toilets<br>12. Inspect ablution facilities regularly<br>13. Supply safe drinking water<br>14. Abide by the Occupational Health and Safety and Labour Act of Namibia and other statutory requirement such as International Labour Practise (ILO) |                                     |                   |
| <b>Visual Impact</b>             | To prevent litter / waste scattered all over and preserve aesthetic value | 1. Maintain good house keeping<br>2. Trenches, access roads , camping places must be rehabilitated and kept clean  | Scattered Litter, Visual inspection | Site Manager      |
| <b>Impact on Flora</b>           | To ensure sustainable conservation the vegetation                         | 1. Line layout must avoid mature trees not to be cut down<br>2. Do not plant alien trees   | Complain and records                | Site Manager      |

| <b>Environmental / Social Impact</b>         | <b>Objectives</b>                                       | <b>Proposed Mitigation Measures</b>   | <b>Monitoring Indicator</b>                    | <b>Party Responsible</b> |
|--|---|---|--|--------------------------|
|  |   | 3. Don not harvest firewood   |  |                          |
| <b>Impact on Fauna</b>                       | To ensure protection of animals especially wild animals | <ol style="list-style-type: none"> <li>1. Do not kill animals if found on site (unless it is an eminent danger to human life)</li> <li>2. There must be ZERO tolerance to poaching</li> <li>3. The food must be stored in the closed place in order not to attract baboons</li> <li>4. No weapons may be taken to the site</li> </ol>   | Complaints from farmers and record of poaching | Site Manager             |
| <b>Conservation of Ground Water Resource</b> | To prevent exposure of ground water                     | <ol style="list-style-type: none"> <li>1. Ensure that drilled holes are properly closed to prevent ground water exposure</li> </ol>   | Rehabilitated drilled sites                    | Site Manager             |
| <b>Surface and Ground water pollution</b>    | To prevent water pollution                              | <ol style="list-style-type: none"> <li>1. During drilling, water must be retained in a lined pond to prevent pollution</li> <li>2. Fuelling of heavy vehicle on site must be well coordinated at designated places</li> <li>3. Stationary vehicles must be provided with drip tray to capture oil, lubricants and hydraulic fluids leakages</li> <li>4. All vehicle and machinery must be well service to avoid leakages</li> </ol> | Physical inspection                            | Site Manager             |

| Environmental /<br>Social Impact | Objectives              | Proposed Mitigation Measures   | Monitoring Indicator | Party Responsible |
|----------------------------------|-------------------------|--|----------------------|-------------------|
|                                  |                         | <ol style="list-style-type: none"> <li>5. Oils, lubricants and hydrocarbons must be stored in a proper storage facility with bunded grounds</li> <li>6. Provide and train on oil spill emergency response</li> <li>7. Servicing of vehicles and machinery must take place at designated sites</li> <li>8. In event of any pollution, polluted soils must be collected and dumped at an approved site.</li> <li>9. The water collection pit from drilling must be layered to avoid seepage</li> </ol> |                      |                   |
| <b>Land Degradation</b>          | To prevent soil erosion | <ol style="list-style-type: none"> <li>1. Movement of heavy vehicles must be coordinated and restricted to be on access roads</li> <li>2. Normally, gravel roads are meant for light vehicles, exploration vehicles have the potential to damage the farm access roads. Hence proper road maintenance must be implemented to ensure that the roads are left on good state</li> </ol>   | Physical inspection  | Site Manager      |

| Environmental / Social Impact | Objectives  | Proposed Mitigation Measures   | Monitoring Indicator                                | Party Responsible |
|-------------------------------|---|--|---|-------------------|
| <b>Waste Generation</b>       | To ensure good housekeeping and prevent littering | <ol style="list-style-type: none"> <li>1. Provide Skip bins to collect waste and be disposed of at an approved disposal site</li> <li>2. Do not burry waste on site</li> <li>3. When necessary excavate a small biodegradable waste site that would be dump filled at the end of the project</li> <li>4. Used oil, grease and lubricants cans must be collected in appropriate drums and disposed of at an approved site.</li> </ol> | Waste bins on site<br>Physical inspection           | Site Manager      |
| <b>Noise Impacts</b>          | To prevent noise pollution from flying aircraft   | <ol style="list-style-type: none"> <li>1. The aircraft must fly at heights which may not cause noise nuisance to animals</li> <li>2. A fixed wind air craft is recommended than a helicopter</li> <li>3. Confirm flying schedules with farmers, whose operation is tourism related</li> </ol>  | Complaints from farmers and members of public       | Site Manager      |
| <b>Traffic</b>                | To ensure coordinated movement of heavy vehicles  | <ol style="list-style-type: none"> <li>1. Trucks must be installed with a rotating headlight beam lights</li> <li>2. Truck must maintain a low speed to prevent excessive dust and accident</li> </ol>   | Records of public complain<br>Visible warning signs | Site Manager      |

| Environmental /<br>Social Impact                            | Objectives  | Proposed Mitigation Measures  | Monitoring Indicator                                | Party Responsible          |
|---|---|---|---|----------------------------|
|   |   | 3. The roads must be maintained by scrapping and compacting<br>4. Install warning signs where necessary   |   |                            |
| <b>Oil Leakages</b>   | Manage fuels, oils and lubricants leakages from Vehicles and Machinery to prevent pollution | 1. Ensure all vehicle are well service and leak inspection are done;<br>2. Provide drip trays to stationary vehicle<br>3. Servicing of vehicle must be done at an approved site;<br>4. Re-fuelling, oil replacement must be done on approved sites;   | Physical verification and routine monitoring        | Management or Site Manager |
| <b>Archaeology /<br/>Heritage Resources /<br/>Artefacts</b> | Preserve Heritage   | 1. Employee must be trained on the possible find of archaeological material in the area;<br>2. Implement a chance find and steps to be taken when archaeological material finding (Heritage (rock painting and drawings), human remains or artefacts) are unearthed<br>Stopping the activity immediately <ul style="list-style-type: none"> <li>i. Informing the operational manager or supervisor</li> <li>ii. Cordoned of the area with a danger</li> </ul> | Sighting report/s of heritage resources / artefacts | Management or Site Manager |

| Environmental /<br>Social Impact | Objectives | Proposed Mitigation Measures   | Monitoring Indicator | Party Responsible |
|----------------------------------|------------|--|----------------------|-------------------|
|                                  |            | <p>tape and manager to take appropriated pictures.</p> <p>iii. Manager/supervisor must report the finding to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).</p> <p>iv. No artefacts must be removed or be interfered without prior authorisation from the Namibian National Heritage Council (NHC)</p> |                      |                   |

## 7. Closure / Decommissioning Plan

During exploration, evasive processes includes trenching and drilling. Trenching is normally done by hand, they are not deep and they are immediately rehabilitated after sampling. Drilling may necessitate the establishment of access roads to targets site, hence these roads must be rehabilitated immediately. After geochemical sampling with the drill, the casing must be removed and the drill hole must be properly covered, unless otherwise agreed with the locals to leave the casing for purpose of making water borehole (**Figure 8**).



**Figure 8** RC drill hole after rehabilitation

## **8. Conclusion and Recommendations**

### **8.1. Conclusion**

The following are points of consideration;

- The review of the Environmental Management Plan found it be adequate, practical and efficient towards the improvement of environmental sustainability;
- In accordance to the submitted bi-annual reports, there were no red-flags about environmental performance;
- With adequate implementation of the EMP, the project is not expected to pose harm to the environment.
- Should this exploration yield into the potential of establishing a mine, a comprehensive EIA must be undertaken which shall include all necessary specialist studies.

### **8.2. Recommendations**

- It is recommended to the approving authority to approve the renewal of the Environmental Clearance Certificate for EPL 5496.



## 9. Reference

- Dr. Martin Pickford and Dr Brigitte Denut 2010., Memoir 21 Karst Geology and Palaeobiology of Northern Namibia, Ministry of Mines and Energy Geological Survey of Namibia
- Enviro Dynamics 2014., Environmental Assessment for the exploration of base metals on exclusive prospecting licenses 5606, 4934, 5712 & 5713), Kavango East Region, Namibia.
- Greg Christelis and Wilhelm Struckmeier 2011., Groundwater in Namibia; An Explanation to the Hydrogeological Map, Ministry of Agriculture Water and Forestry
- J.E. Misiewicz 1988., The Geology and Metallogeny of the Otavi Mountain land, Damara Orogen, Swa/Namibia, with particular reference to the Berg Aukas zn·pb-v Deposit - A Model of Ore Genesis

## 10. Appendixes

### 10.1. Appendix 1. ECC: August 2018 - September 2021



REPUBLIC OF NAMIBIA

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**MINISTRY OF ENVIRONMENT AND TOURISM**

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C/o Police Magistrate  
Dr Kenneth Kaunda Street  
P.O. Box 12308  
Windhoek  
Namibia  
22 August 2018

**OFFICE OF THE ENVIRONMENTAL COMMISSIONER**

The Manager  
Huab Energy (Pty) Ltd  
P O Box 5  
Kombat

Dear Sir/Madam

**SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE PROPOSED EXPLORATION OF BASE AND RARE METALS WITHIN THE EXCLUSIVE PROSPECTING LICENSE NO. 5496 AT GROOTFONTEIN DISTRICT, OTJOZONDJUPA REGION**

The Environmental impact assessment and Environmental Management Plan submitted are sufficient as they have made an adequate provision of the environmental management for the proposed activities. From this perspective, regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored throughout this process.

This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project. From this perspective, I issue this clearance with the following condition: All relevant permits should be obtained prior to the commencement of the proposed activities.

On the basis of the above, this letter serves as an environmental clearance certificate for the project to commence. However, this clearance letter does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from this project's activities. Instead, full accountability rests with Huab Energy (Pty) Ltd and his consultants.

This environmental clearance is valid for a period of (three) 3 years, from the date of issue unless withdrawn by this office.

Yours sincerely,

  
Teofilus Nghitila  
**ENVIRONMENTAL COMMISSIONER**





**"Stop the poaching of our rhinos"**

All official correspondence must be addressed to the Permanent Secretary

# 10.2. Appendix 1. ECC: September 2021- September 2024

ECC – 01619

Serial: FUmYD41619



**REPUBLIC OF NAMIBIA**  
**MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM**

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

**ENVIRONMENTAL CLEARANCE CERTIFICATE**

ISSUED

In accordance with Section 37(2) of the Environmental  
Management Act (Act No. 7 of 2007)

TO

Huab Energy Pty Ltd  
P O Box 5, Kombat

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**EXPLORATION ACTIVITIES IN THE EXCLUSIVE PROSPECTING LICENSE  
(EPL) 5496 LOCATED AT GROOTFONTEIN DISTRICT  
OTJOZONDJUPA REGION**

Issued on the date: 2021-09-09  
Expires on this date: 2024-09-09

(See conditions printed over leaf)



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