



Submitted to: Damaran Exploration Namibia (Pty) Ltd.
Attention: Mr Keith Webb
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Namibia

REPORT:

EXPLORATION ACTIVITIES ON EPL 4818-

COMPLIANCE REPORT

PROJECT NUMBER: ECC-143-537-REP-02-A

REPORT VERSION: REV 01

DATE: 2 SEPTEMBER 2024

Prepared by:



TITLE AND APPROVAL PAGE

Project Name: Exploration activities on EPL 4818- Compliance report
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Status of Report: Final for Government Submission
Project Number: ECC-143-537-REP-02-A
Date of issue: 2 September 2024
Review Period NA

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ABBREVIATIONS

ABBREVIATION	DESCRIPTION
%	percentage
Damaran Exploration	Damaran Exploration Namibia (Pty) Ltd
DEA	Department of Environmental Affairs
ECC	Environmental clearance certificate
ECC	Environmental Compliance Consultancy (Pty) Ltd
EIA	environmental impact assessment
EPL	exclusive prospecting license
EMP	environmental management plan
JV	joint venture
km	Kilometre
Km/h	Kilometre per hour (distance covered over a period)
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
MRE	mineral resource estimate
MAWLR	Ministry of Agriculture, Water and Land Reform
N/A	Not applicable
PVC	Polyvinyl chloride
RAB	Rotary Air Blast
RC	Reverse Circulation
TA	Traditional authority

1 INTRODUCTION

1.1 COMPANY BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Damaran Exploration Namibia (Pty) Ltd (Damaran Exploration), (hereafter referred to as the Proponent), to renew their environmental clearance certificate for EPL 4818. Mandarin Investment (Pty) Ltd is the holder of the license (EPL 4818), which is a joint venture (JV) between Damaran Exploration (Pty) Ltd and Epangelo Mining Company (Pty) Ltd. The Proponent holds an approved environmental clearance certificate (ECC-01620) issued by the Ministry of Environment, Forestry and Tourism (MEFT) on 19 September 2021 (see Appendix A) for exploration activities on exclusive prospecting licence (EPL) 4818 for base and rare metals, and precious metals in the Omaruru district, Erongo Region. As part of this application, an environmental compliance audit has been undertaken to determine the status of compliance with the environmental management plan.

EPL 4818 is situated ~15 km from Okombahe and ~30 km east of Uis in the Erongo Region (-21.19388, 15.277164). The EPL is bordered by the C36 main road to the south and falls within the Okombahe Reserve, while the southwestern portion of the EPL falls within the Tsiseb Conservancy as shown in Figure 1 below.

1.1 PURPOSE OF THIS REPORT

The purpose of this report is to document the findings of the environmental compliance audit which took place on the 3rd of June 2024 along with preceding environmental audit and bi-annual reports, to assess the compliance of the Proponent with their environmental management plan and conditions of their environmental clearance certificate. The bi-annual reports from 2021-2024 and other environmental audit reports accompany the renewal application for the environmental clearance certificate for the Project.

The approved EMP for the existing environmental clearance certificate is audited to monitor the proceeds of the project and ensure that all measures stipulated in the document are met and effectively adhered to, as required by the Department of Environmental Affairs (DEA). In an event where the project activities are altered, the EMP is required to be revised and amended accordingly.

As per the Environmental Management Act, No. 7 of 2007 and its EIA Regulations of 2012, the Project cannot be undertaken without a valid environmental clearance certificate.

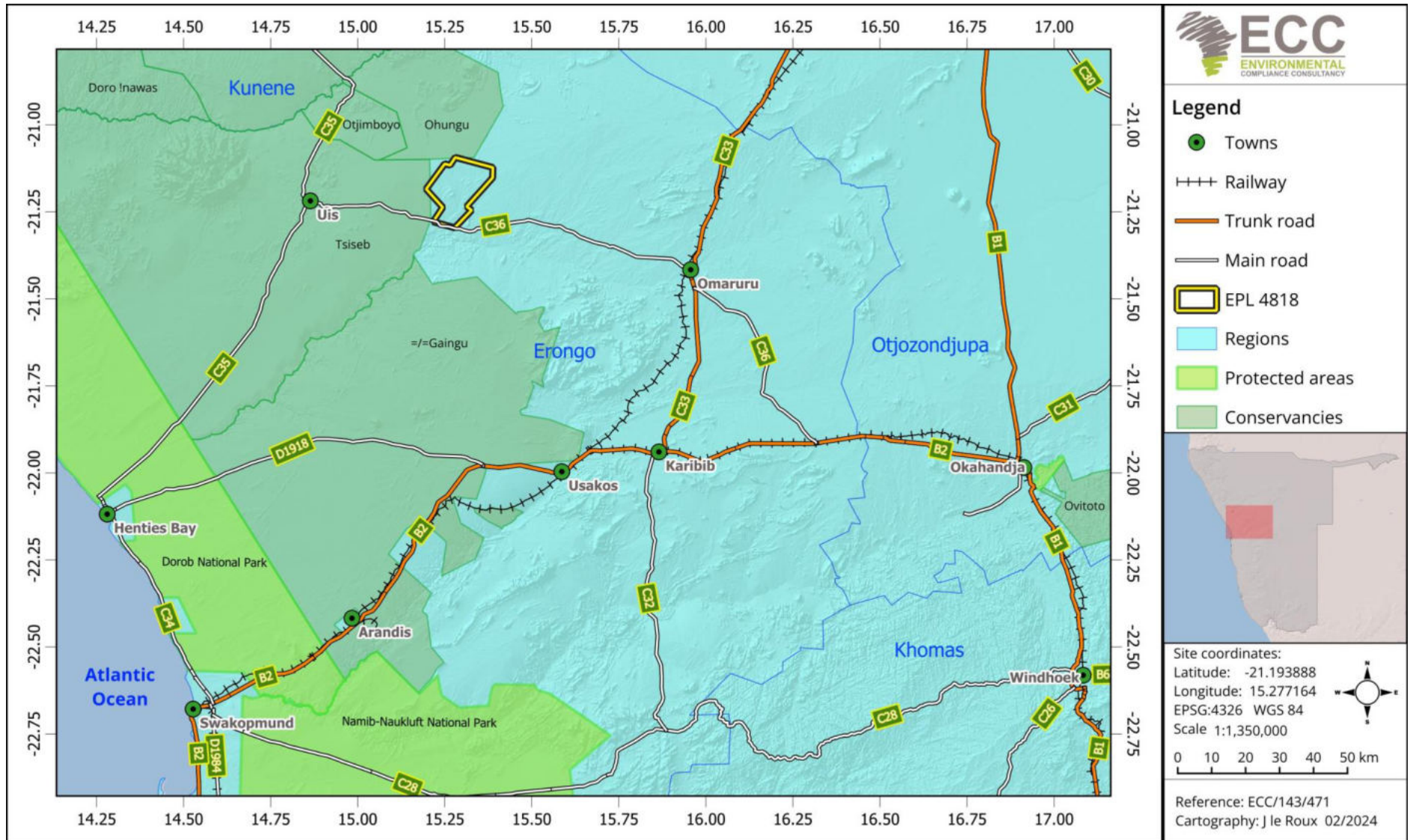


Figure 1 - Location of EPL 4818.

1.2 THE PROPONENT OF THE PROJECT

Table 1 – Proponent’s details

Company Representative:	Contact Details:
Mr Keith Webb Country Manager	Damaran Exploration Namibia (Pty) Ltd Private Bag 12012 Ausspannplatz Windhoek Namibia kwebb@wiagold.com.au +264 81 302 2167

1.3 ENVIRONMENTAL AND SOCIAL ASSESSMENT PRACTITIONER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

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2 BACKGROUND TO THE PROJECT

Exploration of EPL 4818 by the Proponent commenced in 2018. Since then, a series of drilling campaigns have been conducted including Reverse Circulation (RC), Rotary Air Blast (RAB), diamond and percussion drilling. As a result of those drilling campaigns, a significant gold deposit with an inferred mineral resource estimate (MRE) has emerged, resulting in further exploration to confirm and potentially grow the MRE.

2.1 RENEWAL ACTIVITIES

The proposed project is for the exploration of base, rare and precious metals, industrial minerals and precious stones. As part of the proposed exploration project, the following activities are envisaged for the renewal period:

- Drilling (RC, RAB, diamond and Percussion)
- Mineral sampling
- Soil sampling

3 ENVIRONMENTAL COMPLIANCE AUDIT

3.1 SITE INSPECTIONS

An EMP compliance audit was carried out by ECC on the 3rd of June 2024. The findings of the audit are captured in Table 2 below.

3.1.1 BI-ANNUAL MONITORING

An environmental report is submitted to the Ministry of Environment, Forestry and Tourism (MEFT) biannually. The reporting periods are from January to June and July to December. These reports report on compliance regarding the activities taking place on-site, roads or tracks made or used, accommodation structures and infrastructure erected, any rehabilitation done, and any incidents of conflict reported. The bi-annual reports for EPL 4818 are attached in Appendix C.

3.2 ACTIVITIES FOR THE MONITORING PERIOD

During the period under review, the Proponent undertook numerous geochemical surveys and geophysics associated with exploratory drilling. These activities include:

- RC drilling
- RAB drilling
- Diamond drilling
- Percussion drilling
- Creation of new tracks
- Soil sampling
- Environmental monitoring campaigns

In addition to the various drilling campaigns, new tracks were created to allow access to the various drilling sites as shown in Figure 2 below.



Figure 2 - Creation of new tracks to provide access to the various drilling sites.

In addition, and in support of the above, environmental monitoring was undertaken. This included dust fallout monitoring, groundwater level and quality monitoring.

Dust fallout monitoring aims to quantify, assess, and understand dust generation and associated potential impacts that the exploration activities may have on the air quality of the surrounding environment. Dust fall monitoring prior to commencement of mining activities also provides a useful baseline against which future results and impacts can be assessed.

Groundwater quality sampling and measuring of rest water levels is undertaken at two (2) boreholes, namely the community borehole and the exploration tank borehole. Groundwater monitoring is aimed at establishing temporal and spatial baseline data against which future trends and changes may be evaluated.

Below are images of waste being disposed of at the Okombahe waste disposal site and hydrocarbon containers being placed on and contained in plastic lined areas, shown in Figure 3 and Figure 4 below.



Figure 3 - Waste from site being disposed of at the Okombahe disposal site.



Figure 4 - Waste from site being disposed of at the Okombahe disposal site.



Figure 5 - Storage and utilization of hydrocarbons on plastic sheeting to prevent soil contamination.



Figure 6 - PVC sheeting around diesel tank fuelling station in site



Frontier Multi Industries
 t/a Capitec Waste Management Services

WASTE MANIFEST / SAFE DISPOSAL CERTIFICATE
 CONTRACTING FOR WINDHOEK MUNICIPALITY

Weighbridge Transaction No.: B
 Weighbridge Transaction No.: B 1204565

KUPFERBERG WASTE DISPOSAL SITE
 P.O. Box 41077, Ausspannplatz, Windhoek, Namibia
 Cell: 081 144 3313 / 081 840 7012
 E-mail: info@frontiernamibia.com
 Website: www.capitecwaste.com

Ref. No.: **5085**

GENERATOR'S NAME AND ADDRESS		CONTACT PERSON		
Ferrod Drill Namibia (Pty)		Name: <u>Quinton</u> Delivery Date: <u>2024/03/08</u>		
TRANSPORTER'S NAME		CONTACT PERSON		
John Free Steen		Name: Delivery Date: <u>2024/03/08</u>		
DISPOSAL SITE		CONTACT PERSONS		
KUPFERBERG GENERAL & HAZARDOUS WASTE DISPOSAL SITE C 26 KUPFERBERG ROAD, WINDHOEK		Mr. S. Shilongo - Cell: +264 81 144 3313 Miss E. Weyulu - Cell: +264 81 840 7012		
WASTE DETAILS, TYPE & COMPOSITION				QTY (Kg/No.)
Condemned/Off-Spec. Foods	Condemned Cosmetics	Seized Goods	Waste Outside WHK	
Blood Waste	Animal Carcasses	Meat and Bone Meal	Film Effluent	
Sewage Sludge	Tannery Effluent	Leather Trimmings	Petroleum Sludge	
Waste Oils	Waste Oil Sludge	Contaminated Soil	Transformer Oils	200kg
Incineration Ash	Medical Waste	Pharmaceuticals	Histological (Lab)	
Paints/Thinners	Carbide Lime	Asbestos	Bitumen	
Chemicals	Sulphuric Acid	Ferrous Sulphate	Fluorescent Tubes	
Plant Poisons	Chemical Containers	Flooring Adhesive	Carbon Dioxide Filters	
SPECIAL INSTRUCTIONS, TESTING & TREATMENT				
Trenching: Excluding pre-treatment	<input checked="" type="checkbox"/> TRENCHING	<input type="checkbox"/> Co-Disposal by Trenching		
Pre-treatment required	<input checked="" type="checkbox"/> FLY-ASH	<input type="checkbox"/> ENCAPSULATION		
Pre-treatment required	<input type="checkbox"/> LIME	<input type="checkbox"/> Other (CHEMICALS)		
REMARKS:				
CERTIFICATION		NAME (PRINTED)	SIGNATURE	
GENERATOR: I hereby declare that the contents are properly described, packaged, marked and labelled prior to transportation according to all relevant legislation.				
TRANSPORTER: Acknowledgement of receipt of waste.		<u>Quinton</u>	<u>[Signature]</u>	
FACILITIES/ OR OPERATOR: Acknowledgement of receipt of waste.				
HEALTH INSPECTOR: Acknowledgement of Off-Spec Foodstuffs.				

THIS DOCUMENT FORMS PART OF A WASTE TRACKING MEASURE TO ENSURE A SAFE DISPOSAL SYSTEM. IF FOUND PLEASE RETURN TO THE GENERATOR AS LISTED ABOVE.
 prime press 080022

Figure 7 - Certificate from the Windhoek dump site where the drilling contractor disposes the contaminated soil.

3.3 ANNUAL COMPLIANCE AUDIT

The EMP provides the technical details for each mitigation, monitoring and institutional measure, including the impact(s) to which it relates and the conditions when required, together with designs, equipment descriptions and operating procedures as granted.

3.4 COMPLIANCE AUDIT FINDINGS

This section outlines the findings of the environmental audit completed for the project. It addresses obligations in terms of the key Acts that govern the activities on site, and the

commitments made in the EMP, and presents the findings and recommended corrective actions where applicable (Table 2 - Table 5).

The EMP:

- Identifies all mineral exploration activities that could cause environmental damage (risks and potential impacts) and provides a summary of actions required.
- Identifies institutions responsible for ensuring compliance with the EMP and provides their contact information.
- Provides standard procedures to avoid, minimise and mitigate the identified negative environmental impacts and to enhance the positive impact of the proposed activities on the environment.
- Provides for site rules and actions required.
- Forms a written record of procedures, responsibilities, requirements and rules for contractor/s, their staff and any other person who must comply with the EMP.
- Ensure zero pollution incidents; minimal vegetation clearing and earthworks, protect local flora, fauna, and water resources; and use water and other natural resources effectively and efficiently.
- Provides a monitoring and auditing programme to track and record compliance and identify and respond to any potential or actual negative environmental impacts and record any mitigation measures that are implemented.

3.5 ISSUES OF NON-COMPLIANCE

Numerous issues of non-compliance had been noted during both bi-annual and EMP compliance audits. The non-compliances are listed below:

- No sign of speed limit of 30km/h enforcement on site
- No visible exits available for small animals when they fall into trenches
- No suitable receptacles for waste disposal are provided at appropriate locations on site.
- No receptacles marked for different waste types.
- Refuelling and maintenance of vehicles are not being conducted on impermeable surfaces.
- PVC lined sumps have not been used for the collection of oil and silt contained in drilling water.
- Spills are not being contained and cleaned up immediately.



Figure 8 - Oil spillage not contained or cleaned up immediately.

- The proponent is in the process of applying for the required permits in terms of the new Water Act for drilling boreholes.

Table 2 - EMP Audit.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
Air survey	<ul style="list-style-type: none"> - Noise 	<ul style="list-style-type: none"> - Discuss flight plans and schedule with community prior to air surveys. - Avoid residences and livestock enclosures where possible. - Adjust survey heights over sensitive receptors or bypass them to minimise noise disturbance. - Communication of the flight schedules with the local Conservancy Offices and Traditional Authorities to provide fair warning to hunters and other tourism-related operators. 	<ul style="list-style-type: none"> - Partially Compliant 	<ul style="list-style-type: none"> - No record of communication with traditional authority for the period under review.
Ground survey	<ul style="list-style-type: none"> - Socio-economic 	<ul style="list-style-type: none"> - Honour agreements set out in the site-access contracts. - Schedule exploration activities in such a way that disturbances to hunting operations are minimised. - No new access tracks are created during mapping and soil sampling if not otherwise agreed with the landowner during the land access agreement. - No firearms are allowed on site. - Consult and provide feedback regarding activities. - Provide contact details of a designated Epangelo person, who will serve as a liaison between landowners and the exploration teams. - Poaching and plant theft will not be tolerated, and staff found in possession will be prosecuted. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - Several new tracks created were recorded, which were preapproved by the TA as per conversations with the proponent. - No reports of poaching were recorded. - Continuous engagement is conducted by the proponent however there are no physical records of engagement for this reporting period. - Traditional authorities have stated that they do not

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
		<ul style="list-style-type: none"> - Traditional Authorities are to be provided with a list of all people working on site along with a photographic key for easy identification. - Staff will be provided with visible identification. - All staff operating on-site will be provided with identification and proof that they are working for the applicant. - Ensure gates are closed after entry and exit. - Scheduling/planning along with residents. - Notify Traditional Authority in advance of planned exploration activities. - Include in the Traditional Authority agreement that no smoking is permitted in the veld. 		<ul style="list-style-type: none"> - require a list of people working on-site. - Traditional authorities have been informed of all activities taking place on-site, however no records are available. - The proponent ensures that all contractors and employee's uniforms are branded with the company logo to provide some form of official identification when on site. - No non-smoking agreement is in place, however smoking areas are now demarcated, and a bucket cigarette are put out.
	<ul style="list-style-type: none"> - Biodiversity 	<ul style="list-style-type: none"> - The footprint of the area to be disturbed for surveying/mapping and for providing access to survey sites will be minimised as far as is practically possible. - Epangelo will implement a zero-tolerance policy about the killing or collecting of any biodiversity. This applies to people directly employed by 	<ul style="list-style-type: none"> - Partially Compliant 	<ul style="list-style-type: none"> - No speed limits were seen to be enforced on site. - No exits seen in tranches should small animals fall into trenches. - No open fires were reported during this reporting period.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
		<p>Epangelo as well as any contractors working on their behalf.</p> <ul style="list-style-type: none"> - Employees and contractors will be shown the value of biodiversity and the need to conserve the species and systems that occur within the project area. - Inform Epangelo of botanical sensitive areas, including no-go areas in the access agreement. - No open fires will be permitted on site. - Speed limits will be enforced to prevent road kills. - Permits will be required for the removal of protected tree species. - Pits and trenches will either be opened and closed on the same day or will be fenced off until they can be closed. - Ensure that trenches and pits allow for smaller animals to exit the pits/trenches if they fall into them. - No excavations will be left open overnight unless fenced off. - Consult residents to help identify important sites and species. 		<ul style="list-style-type: none"> - No tree removals were reported during this reporting period. - No incidences of poaching were recorded or reported during this period. - The proponent shared the relevant footprints and ECC agreed the disturbance was minimised as best possible. - No training was reported during the period under review. - Drill holes were rehabilitated after drilling and samples had been extracted.
	<ul style="list-style-type: none"> - Air quality 	<ul style="list-style-type: none"> - Vehicle speeds will be limited to 40km/h on access routes to limit dust. 	<ul style="list-style-type: none"> - Compliant 	<p>The Proponent complied with the requirements of the EMP.</p>

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
	<ul style="list-style-type: none"> - Heritage 	<ul style="list-style-type: none"> - If archaeological resources are discovered; a chance find emergency procedure will be implemented which includes the following: - All work at the find will be stopped to prevent damage. - An appropriate heritage specialist will be appointed to assess the findings and related impacts. - Permitting applications will be made to the necessary authorities if required; and - If any graves are discovered during the exploration activities, these will be avoided and preserved as a priority. If damage is unavoidable, before damaging or destroying any identified graves, permission for the exhumation and relocation of graves must be obtained from the relevant descendants (if known) and the relevant local and provincial authorities. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - All staff on site were made aware of the Chance find procedure. - No archaeological resources were discovered during the reporting period. - Chance finds procedure will be implemented as required.

Table 3 - EPL 4818 exploration EMP compliance audit - Drill site establishment.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
<ul style="list-style-type: none"> - Access the drill site using a new access track where necessary. - Set up the drilling machine with drip trays and groundsheets - Strip vegetation and topsoil (up to 300mm where available) - Temporarily store topsoil adjacent to the drill site - Set up ablution facilities 	<ul style="list-style-type: none"> - Air quality – dust and gaseous emissions 	<ul style="list-style-type: none"> - The movement of drilling-related vehicles on the unpaved access track will be on a small scale. - Vehicle speeds will be limited to 30km/h on site. - Vehicles and the drilling rig will be maintained in good working order. - Minimise new access route development (routes to be approved by landowners before development) 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The drilling and exploration teams move together on existing tracks and stay away from farming activities, it was also confirmed that only 1-2 rigs were present at a time. - The Proponent complied with the requirements of the EMP.
	<ul style="list-style-type: none"> - Noise 	<ul style="list-style-type: none"> - Vehicles will travel a maximum of 30 km/hour near houses/settlements. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - The Proponent complied with the requirements of the EMP.
	<ul style="list-style-type: none"> - Biodiversity 	<ul style="list-style-type: none"> - Refer to biodiversity management measures relating to ground surveying and sampling. - Honour agreements set out in the site-access contracts, specifically relating to the areas utilised for hunting and 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - Compliance with these measures was confirmed by the proponent.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
<ul style="list-style-type: none"> - Set up fuel and lubricants storage area - Waste management 		<ul style="list-style-type: none"> livestock farming. Special consideration should be given to the sensitive hunting season. - Provide appropriate toilet facilities for the exploration workers on the site or agree with the community to use certain facilities in the area. 		
	<ul style="list-style-type: none"> - Land use 	<ul style="list-style-type: none"> - Access agreements to be prepared and approved before drill site establishment. - The footprint of the area to be disturbed will be minimised as far as is practically possible. - Areas used as laydown areas are to be raked and/or ploughed to encourage revegetation. - Agree on relevant compensation with landowners where land uses are impacted 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - Continuous engagement with the traditional authority has been maintained to ensure prior approval of drill site establishment. - Drill sites no longer in use have been rehabilitated.
	<ul style="list-style-type: none"> - Heritage 	<ul style="list-style-type: none"> - Refer to heritage management measures relating to ground surveying and sampling. 	<ul style="list-style-type: none"> - Compliant 	<ul style="list-style-type: none"> - No archaeological resources were discovered during the period under review.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
				- Chance find procedure will be implemented as required.
	- Socio-economic	- Refer to socio-economic management measures relating to ground surveying.	- Compliant	- The Proponent complied with the requirements of the EMP.
	- Waste Management	<ul style="list-style-type: none"> - Waste generated will be handled by the contract signed with the Traditional Authority. - Suitable receptacles for waste disposal will be provided at appropriate locations on site. These receptacles will be marked for different waste types. - Employees and contractors will be shown the importance of correct waste disposal as well as waste minimisation and recycling. - Waste will be removed from the site and disposed of at a suitable licensed waste disposal facility. - Hazardous waste (including hydrocarbon-contaminated material/soil) will be disposed of at a 	- Partially Compliant	<ul style="list-style-type: none"> - Suitable receptacles for waste disposal are not provided at appropriate locations on site. - These receptacles are not marked for different waste types. - General waste is not being dumped at a licensed waste disposal facility. - The proponent provided certificate of disposal of hazardous materials

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
		licenced hazardous waste disposal facility.		to the Windhoek hazardous waste disposal site as shown in Figure 7.

Table 4 - EPL 4818 exploration EMP compliance audit - Drilling

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
<ul style="list-style-type: none"> - Drill borehole. - Contain all drilling water in the sump and allow it to settle. - Log the drill core and place it on core trays - Maintain ablution facilities 	<ul style="list-style-type: none"> - Contamination of soils and hydrocarbon spillages. - Potential erosions through surface runoffs. 	<ul style="list-style-type: none"> - In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances. - All refuelling and any maintenance of vehicles will take place on impermeable surfaces. - Pollution will be prevented through basic infrastructure design and maintenance of equipment. - Spill kits will be readily available on-site. Employees and/or contractors will be shown to use the spill kits to enable containment and remediation of pollution incidents. - Environmental awareness training of contractors. - Epangelo will establish environmental awareness in employees and contractors. 	<ul style="list-style-type: none"> - Partially Compliant 	<ul style="list-style-type: none"> - PVC lined sumps were not used for the collection of oil and silt contained in drilling water - PVC liners were placed under the fuel tanks to prevent leaks shown in Figure 6 - All areas where hydrocarbons are utilised or stored on plastic sheets.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
		<ul style="list-style-type: none"> - A PVC-lined sump will be used for the collection of oils and silt contained in the drilling water. - Any spills will be contained and cleaned up immediately. - Non-toxic and biodegradable drilling lubricant will be used. 		
	<ul style="list-style-type: none"> - Groundwater and surface water contamination 	<ul style="list-style-type: none"> - Refer to management measures relating to contamination of soils (Table 3). - Licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained for all drilled holes (not just boreholes). - Provide appropriate toilet facilities for exploration workers on the site or agree with the community to use certain facilities in the area. - Drilling activities will avoid any ephemeral pans or Omirambas in the area. 	<p>- Non - Compliant</p>	<ul style="list-style-type: none"> - The proponent is in the process of applying for the required permits for drilling boreholes in terms of the new Water Act. - The proponent has mapped out their drilling sites and has made sure to avoid ephemeral pans or Omirambas in the area.
	<ul style="list-style-type: none"> - Air quality deterioration 	<ul style="list-style-type: none"> - Vehicle speeds will be limited to 60km/h on access routes to limit dust. 		<ul style="list-style-type: none"> - The Proponent complied with the requirements of the EMP.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
		<ul style="list-style-type: none"> – The movement of drilling-related vehicles on unpaved access tracks will be on a small scale. – Water sprays can be used around the lay-down area when a drill site is located near settlements. 		
	– Noise generation	<ul style="list-style-type: none"> – Drilling will only be conducted during the day when drill sites are located close to inhabited homesteads. – Drilling plans and schedules will be discussed and agreed upon with landowners before initiation. – Vehicles will travel a maximum of 30 km/hour near houses/settlements. 	– Compliant	– Exploration activities restricted to daytime (08:00 – 17:00).
	– Land use	<ul style="list-style-type: none"> – Refer to land use management measures relating to drill site establishment (Table 3). 	– Compliant	– The Proponent complied with the requirements of the EMP.
	– Social – provision of toilet facilities	<ul style="list-style-type: none"> – Provide appropriate toilet facilities for exploration workers on the site or agree with the community to use certain facilities in the area. 	– Compliant	– The Proponent complied with the requirements of the EMP.
Water abstraction	– Groundwater quantity	– Water use licenses in terms of the Water Resource Management Act (Act	– Non-Compliant	– The Proponent is in the process of applying for the necessary

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
		<p>No. 11 of 2013) will be obtained for all boreholes.</p> <ul style="list-style-type: none"> – Water levels will be measured before abstraction, during abstraction (daily) and after completion. Levels will be reported to Traditional Authorities. – Should water be reached during drilling the Traditional Authority will be informed. Should the Traditional Authority wish it; the holes will be cased and left for use by the community (liability relating to the boreholes will then be transferred to the Traditional Authority). 		abstraction and drilling permits.

Table 5 - EPL 4818 exploration EMP compliance audit - Closure and rehabilitation.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
<p>General closure activities:</p> <ul style="list-style-type: none"> – Close drill holes (unless otherwise agreed with the Traditional Authority). 	<ul style="list-style-type: none"> – Groundwater and surface water contamination 	<ul style="list-style-type: none"> – In all areas where there is storage of hazardous substances (i.e. hydrocarbons), there will be containment of spillages on impermeable floors and bunded trays that can contain 110% of the volume of the hazardous substances. 	<ul style="list-style-type: none"> – N/A 	<ul style="list-style-type: none"> – The proponent is still conducting exploration and has not entered the rehabilitation stage yet.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
<ul style="list-style-type: none"> - Remove water from the sump and drip trays. - Remove oils and silt from drip trays and store until disposal to permitted hazardous landfill site. - Backfill the sump once it has dried out (dome to allow for subsidence) and plug the borehole (unless an agreement is in place with the community for alternative uses). - Move drill core trays, ablution facilities, water bowser, stores, and 		<ul style="list-style-type: none"> - All refuelling and any maintenance of vehicles will take place on impermeable surfaces. - Pollution will be prevented through basic infrastructure design and maintenance of equipment. - Spill kits will be readily available on-site. Employees and/or contractors will be shown how to use the spill kits to enable containment and remediation of pollution incidents. - Any spills will be contained and cleaned up immediately. 		
	<ul style="list-style-type: none"> - Noise pollution 	<ul style="list-style-type: none"> - Vehicles will travel a maximum of 30 km/hour near houses/settlements. 	<ul style="list-style-type: none"> - N/A 	<ul style="list-style-type: none"> - The proponent is still conducting exploration and has not entered the rehabilitation stage yet.
	<ul style="list-style-type: none"> - Contamination of soils 	<ul style="list-style-type: none"> - Refer to management measures relating to contamination of water (Table 4). 	<ul style="list-style-type: none"> - N/A 	<ul style="list-style-type: none"> - The proponent is still conducting exploration and has not entered the rehabilitation stage yet.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
<ul style="list-style-type: none"> – drill rig from the site. – Dispose of any general waste to a permitted landfill site. – Remove temporary fencing. – Rip and plough compacted areas. – Replace topsoil over disturbed areas. – Rehabilitate access track by ripping. – GPS marker to identify drill site. 	<ul style="list-style-type: none"> – Air quality deterioration 	<ul style="list-style-type: none"> – Vehicle speeds will be limited to 60km/h on access routes to limit dust. – The movement of drilling-related vehicles on unpaved access tracks will be on a small scale. 	<ul style="list-style-type: none"> – N/A 	<ul style="list-style-type: none"> – The proponent is still conducting exploration and has not entered the rehabilitation stage yet.
	<ul style="list-style-type: none"> – Soil erosion 	<ul style="list-style-type: none"> – Impacted footprints are to be raked and/or ploughed to encourage revegetation. – Access routes will be ripped unless the landowners wish for them to remain. – A monitoring program will be implemented to establish re-vegetation progress. – Agree on relevant compensation with landowners where land used for hunting purposes is impacted. 	<ul style="list-style-type: none"> – N/A 	<ul style="list-style-type: none"> – The proponent is still conducting exploration and has not entered the rehabilitation stage yet.
	<ul style="list-style-type: none"> – Waste management 	<ul style="list-style-type: none"> – Decommission ablution facilities. – Ensure that all waste generated during activities is removed from the site and disposed of appropriately. 	<ul style="list-style-type: none"> – N/A 	<ul style="list-style-type: none"> – The proponent is still conducting exploration and has not entered the rehabilitation stage yet.

Activity	Potential impacts	Management/mitigation measures	Compliance	Comments
	<ul style="list-style-type: none"> - Land use 	<ul style="list-style-type: none"> - Traditional Authorities will be invited to carry out site inspections following rehabilitation to ensure that it has been carried out suitably. 	<ul style="list-style-type: none"> - N/A 	<ul style="list-style-type: none"> - The proponent is still conducting exploration and has not entered the rehabilitation stage yet. - No non -non-conformances reported.

4 CONCLUSION AND RECOMMENDATIONS

During the period under review, information was collected through on-site visits during the EMP audit, monthly monitoring campaigns and consultation with the proponent. The Proponent conducted various geophysical and geochemical surveys (RC, RAB, and Diamond Drilling campaigns) during the reporting period.

It is recommended that the proponent promptly apply for the necessary drilling and water abstraction permits from MAWLR and MME and adhere to the permit conditions. The site lacks signage to enforce the 30km/h speed limit and no smoking rules and has no visible exits for small animals in trenches. Additionally, there are no suitable waste receptacles, including those for different waste types. Lastly, the proponent should maintain records of engagement with the local community and traditional authority.

Upon renewal of the environmental clearance certificate, we strongly recommend the proponent address the non-compliances addressed in this report and adhere to all mitigation and management measures stipulated in their environmental management plan.

APPENDIX A – ENVIRONMENTAL MANAGEMENT PLAN

APPENDIX B – ENVIRONMENTAL CLEARANCE CERTIFICATE

ECC – 01620 Serial: SQE8DM1620



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

Epangelo Mining Company (Pty) Ltd
P. O. Box 13369, Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**Proposed prospecting and exploration activities for EPL 4818 situated
in the Omaruru District, Erongo Region**

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

(See conditions printed over leaf)



ENVIRONMENTAL COMMISSIONER



This certificate is printed without erasures or alterations.

APPENDIX C – BI-ANNUAL REPORTS