



Excel Dynamic Solutions (Pty) Ltd

**Draft Environmental Management Plan (EMP):
THE PROPOSED PROSPECTING & EXPLORATION ACTIVITIES
ON EXCLUSIVE PROSPECTING LICENSE (EPL) No. 8798
LOCATED ABOUT 50 KM WEST UIS, ERONGO REGION.**

ECC Application Reference No.: APP-

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Author(s): Mr. Mandume Leonard	Proponent: Century Vibe Mining and Exploration (Pty) Ltd
Reviewer: Ms. Rose Mtuleni	Contact Person: Mr. Chris Fraser
Company: Excel Dynamic Solutions (Pty) Ltd	Cellphone: +264 (0) 81 741 7977
Telephone: +264 (0) 61 259 530	Postal Address: P .O. Box 2566 ,Swakopmund
Fax2email: +264 (0) 886 560 836	Email: chris@cgfmining.com
Email: info@edsnamibia.com	

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1 INTRODUCTION

1.1 Project Background

The Proponent, Century Vibe Mining and Exploration (Pty) Ltd, intends to conduct prospecting and exploration activities on Exclusive Prospecting License (EPL) 8798. On March 8, 2022, an application for EPL 8798 was filed. The approval and granting of EPL No. 8798 require an Environmental Clearance Certificate (ECC). The total area of the EPL is 98 591.2639 hectares (ha), and it is located About 50 km West Uis in the Erongo Region (coordinates: -21.26972; 14.25415) (**Figure 1**). The EPL covers (overlies) Tsiseb Conservancy only (**Figure 2**).

The Proponent intends to carry out prospecting and exploration works for Base and Rare Metals, Dimension Stones, Industrial Minerals, and Precious Metals.

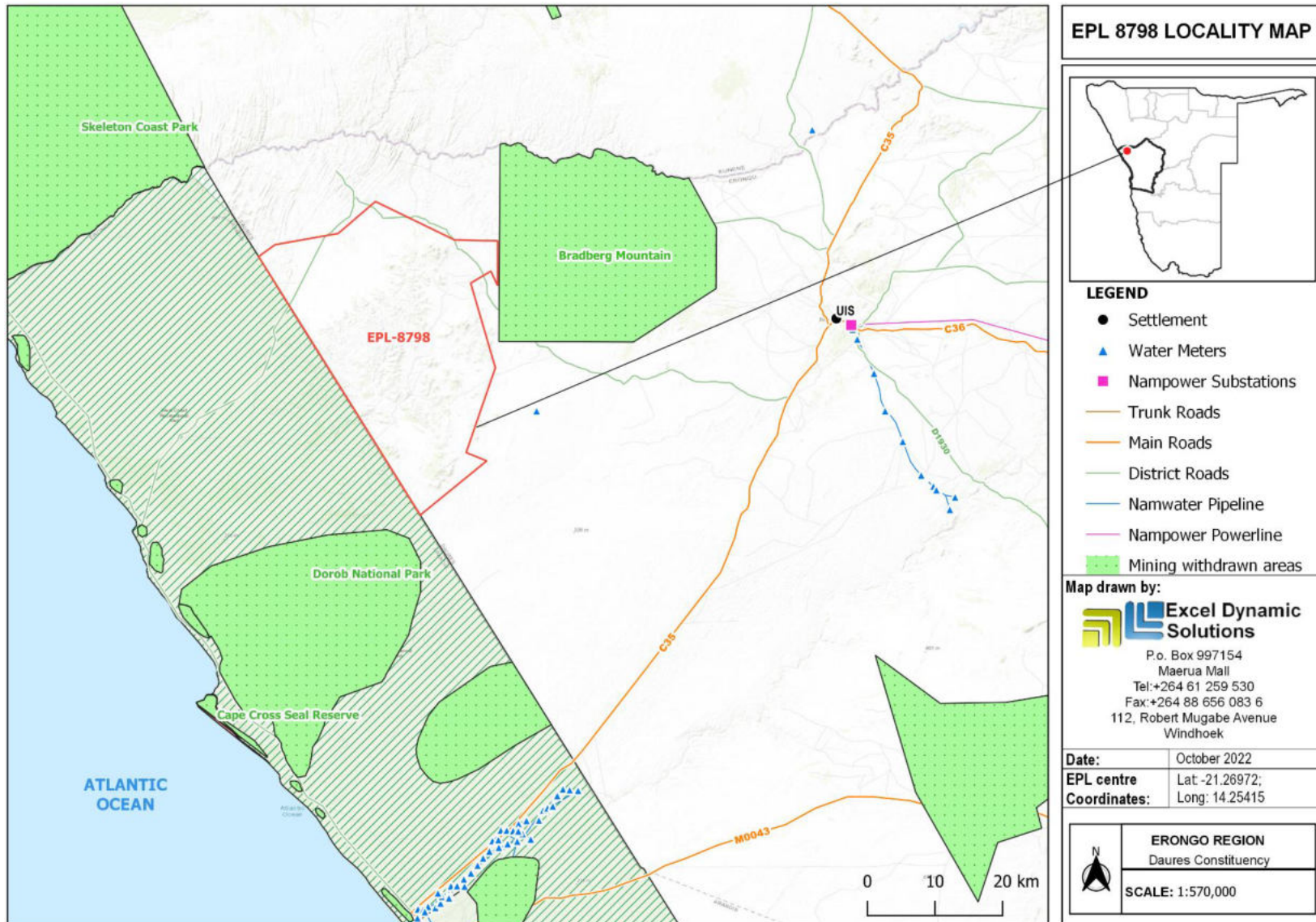


Figure 1: Location of EPL 8798

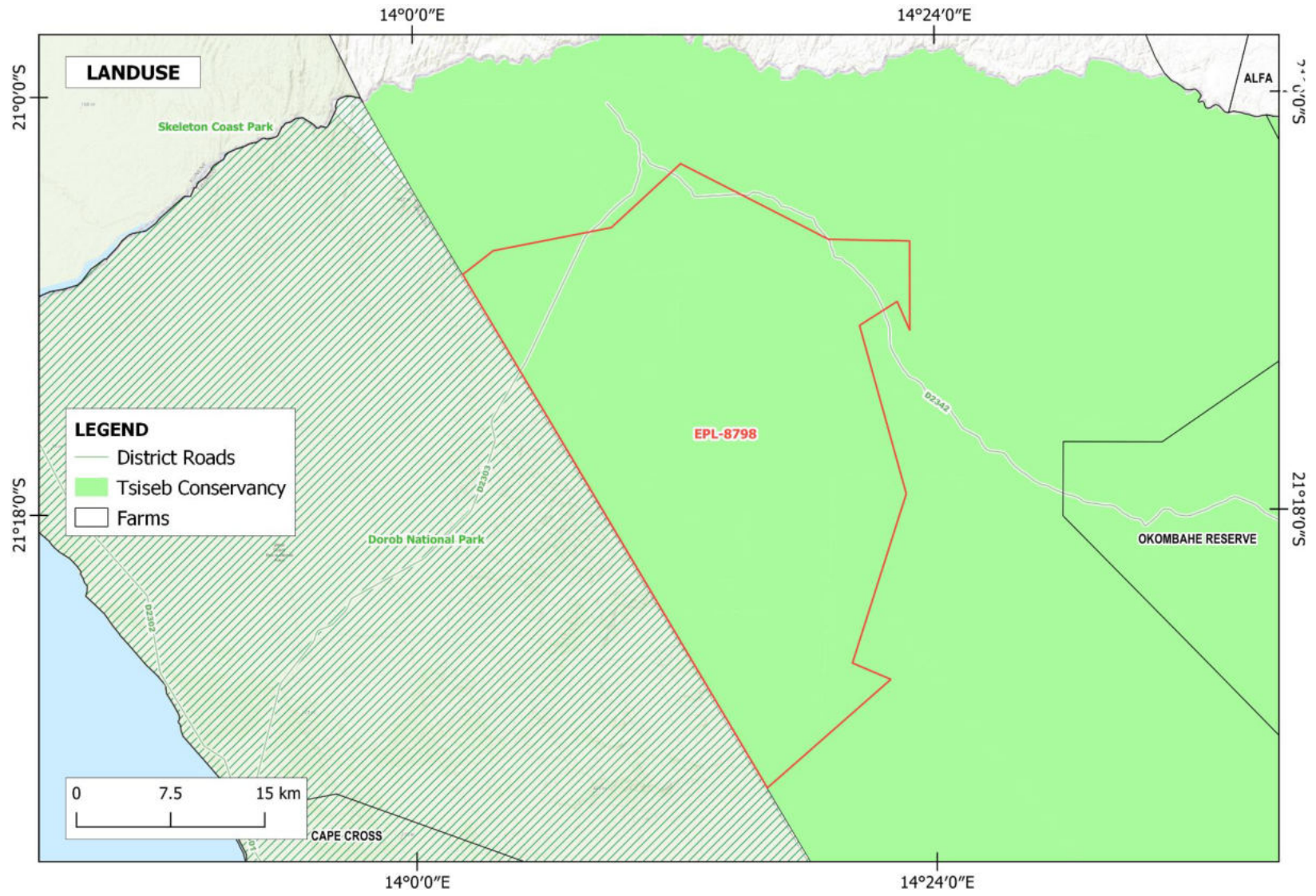


Figure 2: Land Use Map



Excel Dynamic Solutions (Pty) Ltd

In terms of Section 27 (1) of the Environmental Management Act (EMA) (Act No. 7 of 2007) and in line with Sections 32-37 of the EMA, the proposed prospecting and exploration activities on EPL 8798 form part of the listed activities that may not be conducted without an EIA undertaken and an ECC granted. The relevant listed activities as per EIA regulations are:

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

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.

This document has been prepared as a legal requirement of Section 8 of the EMA (Act No. 7 of 2007). The compilation of this EMP is one of the outputs required of the environmental consultant by the Proponent. It is required of the environmental consultant to comply with the EMA and provide for the following:

- Prepare a detailed Environmental Management Plan to be used as a guideline to monitor compliance with the recommendations stipulated in the EIA, and to assist in managing and monitoring activities throughout the proposed exploration project on the EPL.
- The environmental consultant must clarify in the EMP, the roles and responsibilities of the proponent, the contractors, and any other identified stakeholders.

1.2 Aim of the Draft Environmental Management (EMP)

Regulation 8(j) of the EIA Regulations (2012) requires that a draft Environmental Management Plan (EMP) shall be included as part of the Environmental Assessment (EA). A “**management plan**” is defined as:

“...a plan that describes how activities that may have significant environmental effects on the environment are to be mitigated, controlled and monitored.”

An EMP is one of the most important outputs of the EA process. It synthesizes all the proposed management & mitigation and monitoring actions, set to a timeline and with specific assigned

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responsibilities. Additionally, it provides a link between the impacts identified in the EA process and the required mitigation measures. It is important to note that an EMP is a statutory document and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and can be modified to address project changes, environmental conditions, and compliance monitoring feedback.

The purpose of this document is, therefore, to guide environmental management throughout the different phases of the proposed exploration activities, namely: planning, prospecting and exploration, and decommissioning and rehabilitation.

- **Planning phase** - This is the stage of the proposed project during which the Proponent prepares all administrative and technical requirements needed for the actual works on the site. The planning phase includes obtaining of the necessary permits and authorizations from relevant national and local stakeholders, and facilitating the recruitment and procurement processes, in preparation for the exploration activities.
- **Prospecting and Exploration phase** - This is the phase where the Proponent carries out prospecting and exploration activities for the target commodities, and undertakes related activities on site. It is also the phase during which maintenance of the area, equipment and machinery is done by The Proponent.
- **Decommissioning and Rehabilitation** – This is the phase during which the exploration activities on the EPL cease. The decommissioning of exploration operations may be considered due to poor exploration results or a decline in the commodity market price. Before the decommissioning phase, the proponent will need to put site rehabilitation measures in place.

Environmental Monitoring Requirements: To support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented alongside the mitigation plan.

This draft EMP is for use by the proponent, employees and/or contractors to provide management measures to be undertaken during exploration, to address the environmental impacts identified in the scoping report and ensure that the impacts on the environment are avoided, or limited if they cannot be avoided completely.

1.3 Appointed Environmental Assessment Practitioner

To fulfil the requirements of the EMA and its 2012 EIA Regulations, the Proponent appointed Excel Dynamic Solutions (Pty) Ltd (EDS), an independent environmental consulting company to conduct the required EA process on their (Proponent's) behalf. This draft EMP will be submitted as part of an application for the proposed exploration method on the EPLs to the Environmental Commissioner at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT).

2 .LEGAL OBLIGATIONS GOVERNING THE PROPOSED ACTIVITIES

The content of the EMP must meet the requirements of Section 8 (j) of the EIA Regulations, and the EMP must address the potential environmental impacts of the prospecting and exploration activities on the environment throughout the project life cycle. It must also include a system for assessing of the effectiveness of monitoring and management arrangements after project implementation.

The Proponent, therefore, has the responsibility to ensure that the exploration activities as well as the EA process conform to the principles of the EMA, and must ensure that employees act in accordance with such principles. **Table 1** below lists the requirements of an EMP as stipulated by Section 8(e) of the EIA regulations, focusing on specific approvals and permits that may be required for the activities required of the EPL.

Table 1: Applicable legal requirements and permits to the activities of the EPLs No. 8709

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007).	Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). Describes principles which are to guide all EIAs.	The EMA and its regulations should inform and guide this EA process. Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue. Contact details at the Department of Environmental Affairs and Forestry (DEAF),

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	<p>Details requirements for public consultation within a given environmental assessment process (GN 30 S21).</p> <p>Details the requirements for what should be included in a scoping report (GN 30 S8) and an assessment report (GN 30 S15).</p>	<p>Ministry of Environment, Forestry and Tourism (MEFT), Office of the Environmental Commissioner.</p> <p>Mr. Timoteus Mufeti</p> <p>Tel: +264 61 284 2701</p>
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	<p>Section 48 (3): To enable the minister to consider any application referred to in section 47 the minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice.</p> <p>Section 54(2): details provisions pertaining to the decommissioning or abandonment of a mine.</p> <p>Under this Act (Section 51 (1a)),A holder of a mineral license cannot exercise any rights on a private land until the holder has entered into an agreement with the owner regarding payment of compensation.</p>	<p>The proponent should ensure that all necessary permits/authorization for these EPL are obtained from the Ministry of Mines and Energy (MME).</p> <p>Contact person and details at the MME (Mining Commissioner).</p> <p>Mr. Erasmus Shivolo</p> <p>Tel: +264 61 284 8167</p> <p>The Proponent should timely enter into and sign access and land use agreement (consent) with the respective affected farm owners.</p>
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that “No person shall possess or store any fuel except under authority of a license or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in	<p>The Proponent should obtain the necessary authorisation form the MME for the F=fuel storage on-site.</p> <p>Mr. Carlo Mcleod (Ministry of Mines and Energy: Acting Director – Petroleum Affairs)</p> <p>Tel: +264 61 284 8291</p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
	any container kept at a place outside a local authority area".	
Forestry Act 12 of 2001, Amended Act 13 of 2005.	Prohibits the removal of any vegetation within 100 m of a watercourse (Forestry Act S22 (1)). The Act prohibits the removal and transport of various protected plant species.	<p>Should there be any protected plant species, that are known to occur within the project site, these are required to be removed and a permit should be obtained from the nearest Forestry office (Ministry of Environment, Forestry and Tourism (MEFT)) prior to removing them.</p> <p>Mr. Fillemon Kayofa (Acting Director of Forestry Division)</p> <p>Tel: +264 61 208 7320</p>
National Heritage Act No. 76 of 1969.	Calls for the protection and conservation of heritage resources and artifacts.	<p>Should any archaeological material, such as bones, old weapons/equipment etc be found on the EPL site, work should stop immediately, and the National Heritage Council of Namibia must be informed as soon as possible. The Heritage Council will then decide whether to clear the area or conserve the site or material.</p> <p>Contact Details at National Heritage Council of Namibia.</p> <p>Ms. Agnes Shiningayamwe (Regional Heritage Officer) – National Heritage Council of Namibia</p> <p>Tel: (06) 301 903</p>

2.1 EMP Limitations

This EMP has been drafted with the acknowledgement of the following limitations:

- This EMP has been drafted based on the Environmental Assessment (EA) conducted for targeted prospecting and exploration activities of Base and Rare Metals, Dimension Stones, Industrial Minerals, and Precious Metals on EPL 8798.
- The mitigation measures recommended in this EMP document are based on the risks/impacts identified in the ESA, the project description as provided by the Proponent, site investigation and public input. Should the scope of the proposed project change, the risks/impacts will have to be reassessed and mitigation measures provided accordingly.

3 EMP IMPLEMENTATION, ROLES AND RESPONSIBILITIES

The Proponent is ultimately responsible for the implementation of the EMP. However, the Proponent may delegate this responsibility at any time, as they deem necessary during the project phases. The roles and responsibilities of all delegates and parties involved in the effective implementation of this EMP are set out below:

3.1 Competent Environment Monitoring Authorities (DEAF, MEFT)

The DEAF is responsible for enforcing compliance with the EMA, its regulations and full implementation of this EMP. The competent authority also reviews biannual reports and grants ECC renewal after 3 years, following the fulfillment of required environmental compliance audits.

Institutions that provide additional monitoring include, but are not limited to:

- **The National Heritage Council of Namibia:** for archaeological and heritage resources (sites and objects).
- **Ministry of Mines and Energy:** for compliance with the relevant prospecting and exploration requirements, including petroleum products' storage and handling on site.

3.2 The Exploration Manager (or the Proponent)

This manager, *who may also be the Proponent*, is responsible for the following:

- Development and management of schedules for daily activities in compliance with the EMP.
- Managing or overseeing the implementation of this EMP and updating and maintaining it when necessary.

- Ensure that relevant commitments contained in the EMP Action Plans are adhered to.
- Ensure the relevant staff is trained in procedures entailed in their duties.
- Through consultations and cooperation with the ECO/SHE officer, issuing fines to individuals who may be in breach of the EMP provision and if necessary, removing such individuals from the site.
- Setting up and managing the schedule for the day-to-day activities.
- Ensuring all incidents are recorded and documented.
- Undertaking an annual review of the EMP and amending the document when necessary.

3.3 Safety, Health and Environmental (SHE) or Environmental Control Officer (ECO)

The SHE or ECO (as appropriate) is responsible for ensuring that project activities are completed on time, efficiently and sustainably. The ECO/SHE Officer's duties and responsibilities will include the following:

- The SHE Officer will be responsible for the following activities:
- Planning and carrying out site inductions for the workers on-site and visitors to the worksite(s).
- Ensuring compliance with relevant environmental and related authorizations and license conditions.
- Ensure that the requirements of the EMP are carried out during applicable activities throughout the project life span.
- Monitor the overall implementation of the EMP.
- Identifying and appointing appropriately qualified specialists (where necessary) to undertake the programmes in a timely manner and to acceptable standards

3.4 Public Relation Officer (PRO)

The Public Relation Officer is responsible for the following tasks:

- Liaison between the affected farmers (property owners) and/or occupiers of land as well as other stakeholders, and the Proponent.
- Ensure effective communication with stakeholders (affected farmers or landowners or occupiers of land), media (if necessary) and the public.
- Managing public relations issues.

- Preparing and submitting public relations reports, if required.
- Collaborating with personnel and maintaining project-related open communication among personnel.
- Cooperate with all relevant interested and affected parties and stakeholders

3.5 Archaeology: Chance Finds Procedure (CFP) Implementation Roles

The following personnel have been assigned responsibilities as per the Chance Finds procedure (Appendix 1):

- **Operator:** To exercise with due caution if archaeology remains are found.
- **Foreman:** To secure the site and advise management promptly.
- **Superintendent:** To determine a safe working boundary and request inspection.
- **Archaeologist:** To inspect, identify, advise management, and recover remains.

The proponent should thoroughly evaluate these commitments and acknowledge their obligation to the specific management actions outlined in the tables in the following sections:

4 ENVIRONMENTAL MANAGEMENT & MITIGATION MEASURES

4.1 Management of Key Potential Adverse Environmental Impacts.

From the assessment conducted, the following key potential negative impacts have been identified :

- Potential disturbance of grazing land areas,
- Physical land / soil disturbance
- Impact on local biodiversity (fauna and flora), habitat disturbance and potential illegal wildlife hunting (poaching) in the area.
- Potential impact on water resources and soils particularly due to pollution,
- Air quality issue: potential dust generated from the project.
- Potential occupational health and safety risks
- Vehicular traffic safety and impact on services and infrastructure such as local roads.
- Vibrations and noise associated with drilling activities may be a nuisance to locals.

- Environmental pollution (solid waste and wastewater)
- Archaeological and heritage resources impact
- Potential social nuisances and conflicts

4.2 Aim of the Environmental Management Plan Actions

The aim of the management actions of the EMP is to avoid the above-listed potential negative impacts, where possible. Where impacts cannot be avoided, measures are provided to reduce their significance.

Management actions recommended for the potential impacts rated in the ESA carried out for the prospecting and exploration activities were based on the following project stages (phases):

- Planning, Prospecting and Exploration (and site maintenance) phases (**Table 2**)
- Monitoring (**Table 3**)
- Decommissioning and Rehabilitation (section 4.5).

The responsible person(s) should assess these actions in detail and acknowledge their commitment to the specific management actions detailed in the phases given under the following subsections:

4.3 Planning, Prospecting and Exploration Phase Management Action Plans (Mitigation Plan)

The management and mitigation action plans recommended for this phase are presented in **Table 2** below.

Table 2: Management and mitigation action plans for the planning and exploration phases

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
PLANNING PHASE						
EMP implementation and training.	Lack of EMP awareness and implications thereof.	<p>-A Comprehensive Health and Safety Plan for the project activities should be compiled. This will include all the necessary health, safety, and environmental considerations applicable to respective works on sites.</p> <p>An EMP non-compliance penalty system should be implemented on-site.</p> <p>The Proponent should appoint an ECO to be responsible for managing the EMP implementation and monitoring.</p>	<p>-All required Plans and systems are compiled and in place.</p> <p>and Environmental Control Officer (ECO) is appointed.</p>	Proponent	EMP implementation Plans and Systems.	Pre-exploration works.
Authorizations	Lack of Agreements, Permits/ Licenses.	<p>-All the required agreements and licences or permits should be applied for and signed, respectively, before the commencement of work on the EPL or as required.</p> <p>-The permits and agreements referred to herein include land access and land use agreements,</p>	<p>-Applicable permits and licences to be obtained from relevant authorities and kept on site for record keeping and future inspections.</p> <p>-Agreements/permits signed and obtained</p>	Proponent	<p>Proponent</p> <p>Respective authorities and services provider(s)</p>	Prior to exploration works.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		compensation agreements (if necessary), rehabilitation commitment agreements, and petroleum storage permits (if necessary).	from on time, min. 2 months prior to the plan commencement date of works.			
Communication between the Proponent and other neighbouring land users and custodians.	Lack of communication (proper liaison) between land users and Proponent with regards to land use.	-The Proponent may appoint a Public Relation Officer (PRO) or a representative to liaise with the land users. -A clear communication procedure/plan which should include a grievance mechanism.	A PRO is appointed -Ongoing Farmers' Engagement & Consultation throughout the project cycles, when and as required. PRO contact details to be provided to the affected landowners.	Proponent	PRO Complaint's logbook	PRO appointment (Prior to project activities) and their responsibilities throughout the project activities.
Employment	Creation of employment opportunities	- Preference for employment of general and semi-skilled workers should be prioritized towards	-Number of locals employed for exploration activities	Proponent in collaboration with the Exploration	Record of employees	Pre-project activities and when

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>residents. Employment of non-residents, especially should be justified,</p> <p>-Equal opportunity should be provided for both men and women, when and where possible.</p>		Manager (if necessary)		necessary, throughout
Specialised procurement of services.	Contractors and services	The Proponent should use locally derived services where practically possible	Number of hired contractors.	Proponent Exploration Manager	Record of hired or contracted companies or services providers	Pre-project activities and when necessary, throughout
PROSPECTING AND EXPLORATION PHASE						
EMP implementation and training	Lack of EMP awareness and implications thereof	<p>- All new workers on site should receive EMP training.</p> <p>-All site personnel should be aware of necessary health, safety,</p>	Compliance monitoring conducted bi-annually and should be recorded.	ECO	Bi-annual reports	Throughout the exploration phase and as required

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>and environmental considerations applicable to their respective work.</p> <p>-The implementation of this EMP should be monitored.</p> <p>The site should be inspected, and a compliance audit should be done throughout the project cycle.</p> <p>An EMP non-compliance penalty system should be implemented on site.</p>			<p>Records of EMP training conducted.</p>	
<p>Communication between the Proponent and other neighbouring land users and custodians</p>	<p>Lack of communication (proper liaison) between farmers and Proponent with regards to land use</p>	<p>-The PRO/project representative contact details must be shared with all affected parties prior to undertaking activities, for easy communication during exploration activities.</p> <p>The Proponent should compile a clear communication procedure / plan which should include a grievance and response mechanism.</p>	<p>PRO is part of the project personnel.</p> <p>Ongoing Farmers and affected parties,' engagement and consultation throughout the project cycles, when and as required.</p>	<p>PRO</p>	<p>Complaint's logbook.</p> <p>PRO contact details to be provided to the affected land users.</p> <p>Records of farmers' consultation.</p>	<p>Throughout the exploration activities</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
			-Community/farmers' grievances addressed to their satisfaction.		Land access agreement conditions	
Grazing land	Loss of grazing areas	<p>-Any unnecessary removal or destruction of grazing land, due to exploration activities should be avoided.</p> <p>-Vegetation found on the site, but not in the targeted exploration areas should not be removed but left to preserve biodiversity and grazing land.</p> <p>-Workers should refrain from driving off-road and creating unnecessary tracks that may contribute to soil erosion and the loss of grazing land.</p> <p>-Environmental awareness on the importance of the preservation of grazing land for local livestock should be provided to the workers.</p>	<p>-Limited cleared sites</p> <p>-Less access tracks</p> <p>-No complaints from farmers regarding significant land/vegetation clearing</p>	<p>Proponent / Exploration Manager</p> <p>ECO</p>	Grievance logbook	Throughout the phases
Water Resources Use	Over-abstraction (water demand)	The Proponent should be water-use conscious and consider voluntary water use reduction by sticking to their proposed	Water supply agreements	Proponent	Water supplier	Once off supply agreement

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
	and availability)	threshold volumes or less when possible. - The Proponent should aim to use water efficiently, recycle and re-use where necessary and possible. -Water used to cool off operational equipment may be captured and used for the cleaning of project equipment, if possible. -Water conservation awareness and saving measures training should be provided to all the project workers to promote water conservation.	-Proof or recording and quantification of water saving efforts. -Water supplier -Water permits -Inspection of water storage tanks on site	Exploration Manager	Water supplying agreements. Proponent	Throughout the exploration phase
Soils	Physical soil/land disturbance	-Overburden should be handled efficiently during operations to avoid erosion when subjected to erosional processes.	-No proliferation of informal vehicle tracks.	ECO	-Proponent -All personnel	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
	and loss of topsoil.	<p>-Stockpiled topsoil and drill materials should be used to backfill the excavated and disturbed site areas or spots.</p> <p>-Soils that are not within the intended and targeted footprints of the site should be left undisturbed and soil conservation implemented as far as possible.</p> <p>-Project vehicles and machinery should stick to access roads provided for the project operations and avoid the unnecessary creation of further tracks on site, resulting in soil compaction.</p> <p>-The project footprint area should not be cleared entirely, and the exploration vehicles and equipment must have designated sites for parking/storage in order to avoid soil disturbance.</p> <p>-Sites of operations must be rehabilitated after completion of works onsite.</p>	-No new erosion gullies.		-Complaint's logbook	
Soils and water resources	-Soils and water resources pollution	-Oil and wastewater spill control preventive measures should be in place on site to manage soil contamination, preventing and minimizing the contamination from reaching water bodies.	-There have been no reports of pollutants on the soils or, eventually, in the water as a result of exploration activities.	ECO	<p>-Complaint's logbook</p> <p>-Non-permeable material to cover the ground surface in</p>	-Throughout exploration phase.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-All project employees should be sensitized to the impacts of soil pollution and advised to follow appropriate fuel delivery and handling procedures.</p> <p>-The Proponent should develop and prepare countermeasures to contain, clean up, and mitigate the effects of oil spills. This includes keeping spill response procedures and a well-stocked cache of easily accessible supplies.</p> <p>-Ensure employees receive basic Spill Prevention, Control, and Countermeasure (SPCC) training and mentor new workers as they get hired.</p> <p>-Project machines and equipment should be equipped with drip trays to contain possible oil spills when operated on site.</p> <p>-Polluted soils must be removed immediately and put in a designated waste container for later disposal.</p> <p>- Drip trays must be readily available to ensure that any accidental fuel spills along fuel storage facilities or near fuel-consuming equipment are caught</p>	<p>-No visible oil spills on the ground or pollution spots.</p> <p>-Waste containers are available at exploration work sites and campgrounds.</p>		<p>areas where hydrocarbons and potential pollutants are utilized.</p>	

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>and cleaned up as soon as possible.</p> <p>-Heavily polluted soil must be collected and transported away from the site to a hazardous waste treatment facility that has been approved and appropriately classified.</p> <p>-Washing and servicing of equipment contaminated by hydrocarbons should take place at a dedicated area, where contaminants are prevented from contaminating soil or water resources.</p> <p>-Sewage and ablution wastewater should be treated according to the portable toilet manufacturer's instructions.</p>				
Biodiversity	Loss of Fauna and Flora	<p>Fauna:</p> <p>-Poaching of wildlife on the conservancy and surrounding areas is strictly prohibited.</p> <p>-Project workers should refrain from killing or snaring wild animals that may be found on and around the site.</p>	<p>-No disturbance to unmarked areas.</p> <p>-Locals have made no complaints about the unauthorised removal of vegetation or the felling of trees.</p>	ECO	<p>-Barricading tape (to indicate working areas)</p> <p>-Complaint logbook</p>	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-Access roads (even existing ones) should be utilized appropriately in a manner that disturbs minimal land areas as possible, to minimize faunal habitat destruction.- To minimise faunal habitat destruction, access roads (even existing ones) should be used in an appropriate manner that disturbs as few land areas as possible.</p> <p>-Environmental awareness on the importance of faunal preservation should be provided to the workers and contractors.</p> <p>Flora:</p> <p>-The Proponent should avoid unnecessary removal of vegetation</p> <p>-Vegetation found on the site, but not in the targeted exploration areas should not be removed but left to preserve biodiversity on the site.</p> <p>-Movement of vehicles and machinery should be restricted to existing roads and tracks to prevent unnecessary damage to vegetation.</p>	<p>-No complaints of wildlife hunting by the project personnel.</p> <p>-No intentional disturbance or destruction of site vegetation and faunal species</p> <p>-Visible preservation of onsite vegetation</p>			

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-Design access roads appropriately in a manner that disturbs as little vegetation as possible.</p> <p>-Make use of the existing road network as much as possible and avoid off-road driving</p> <p>-Vegetation clearing to be kept to a minimum. The vegetation of the site is mostly low and open, therefore whole-sale vegetation clearing should be applied where necessary and within the EPL footprint.</p> <p>-Vegetation found on the site, but not in the targeted areas should not be removed but left to preserve biodiversity on the site.</p> <p>-Environmental awareness on the importance of floral biodiversity preservation should be provided to the workers and contractors.</p>				
Illegal hunting	-Illegal hunting of wildlife	<p>-No wildlife hunting is permitted.</p> <p>-Site personnel should refrain from killing/poaching or intentionally disturbing wildlife, or any faunal species found on or around the EPL site.</p>	<p>-Incident reports of illegal hunting of wildlife by the project workers.</p> <p>-Contact details of the anti-poaching police</p>	ECO	<p>-Complaint's logbook</p> <p>-Anti-poaching Police Unit</p> <p>-ECO</p>	During site set up, and throughout the exploration phase.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		-The no tolerance to poaching Policy should be developed and made applicable to all site personnel.	unit are provided and visible onsite.			
Land Use	-Conflict between land uses and exploration activities.	-Exploration activities should not in any way hinder the existing land uses within the EPL, but rather promote co-existence throughout the project's operations while respecting other land users. -The project workers and vehicles should be limited to the actual EPL active sites, and not unnecessarily wander or loiter around other parts of the site. -The Proponent should ensure that their activities comply with the conditions set by the competent, regulatory, and affected authorities such that the proposed exploration activities do not severely impact the different existing activities around the EPL.	-Land access and use permits and authorizations. -Compliance with conditions set within operational permits by -Relevant and affected authorities. - There have been few to no complaints about significant interference from adjacent land users.	-PRO -Proponent -ECO	-Proponent -Relevant authorities (MEFT, MME, etc.)	Throughout the exploration phase.
Road use and safety	Increase in vehicular traffic flow	-Vehicles should be driven only on existing access roads and the temporary access roads created on site to facilitate operations; no new roads should be constructed, where possible.	-No complaints from members of the public regarding vehicular traffic issues related to the project activities.	Proponent ECO	Number of project vehicles on site Names of drivers	Throughout exploration phase Site access permit (s) to be

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-The transportation of project materials, equipment and machinery should be kept at minimum, to reduce pressure on local roads.</p> <p>-Heavy truck loads should comply with the maximum allowed limit while transporting materials and equipment/machinery on the public and access roads.</p> <p>-Drivers of all project vehicles should be in possession of valid and appropriate driving licenses.</p> <p>Vehicle drivers should adhere to the road safety rules.</p> <p>-Drivers should drive slowly (40km/hour or less), and be on the lookout for livestock, wildlife and pedestrians.</p> <p>-Project vehicles should be in a road worthy condition and serviced regularly to avoid accidents because of mechanical faults of vehicles.</p>	<p>-All personnel operating the project vehicles and machinery are appropriately licensed and possession of valid driving licenses.</p> <p>-Demarcated areas for parking, offloading, and loading zones are on sites.</p> <p>-If required, site access road permits obtained, and requirements fulfilled.</p> <p>-No creation of unnecessary tracks on site.</p>		<p>Frequency of water carting</p>	<p>applied for and obtained prior to commencement of exploration works</p>
<p>Local services and infrastructure</p>	<p>Overuse and maintenance</p>	<p>-The heavy trucks transporting materials and services to site should be scheduled to travel minimally and at efficiently scheduled times to avoid daily</p>	<p>-Visible efforts of maintaining access and community roads by the Proponent</p>	<p>-Proponent Exploration Manager</p>	<p>Road clearing machinery (bull dozers)</p>	<p>Throughout the exploration phase, when necessary</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>travelling to site, unless on cases of emergencies.</p> <p>The heavy trucks transporting materials and services to site should be scheduled to travel at least twice or thrice a week to avoid daily travelling to site</p> <p>-The Proponent should consider frequent maintenance of local roads on the farms to ensure that the roads are in a good condition for other roads users.</p>				
Occupational Health and safety	General health and safety associated with project activities in both phases	<p>-As part of their induction, project workers should be provided with awareness training of the risks of mishandling equipment and materials on site, as well as health and safety risk associated with their respective jobs.</p> <p>-When working on site, employees should be properly equipped with adequate Personal Protective Equipment (PPE) such as coveralls, gloves, safety boots, earplugs, dust masks, safety glasses, etc.</p> <p>-Heavy vehicle, equipment and fuel storage site should be properly secured, and appropriate</p>	-Comprehensive health and safety plan for all exploration activities compiled.	<p>-Proponent</p> <p>Exploration Manager</p> <p>ECO</p>	<p>-Occupational Health and Safety Personnel</p> <p>Health and Safety Trainings</p> <p>First aid kits</p> <p>Trained worker to administer first aid</p>	Throughout the exploration phase and trainings offered as and when requiredMa

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>warning signage placed where visible.</p> <p>-Drilled boreholes no longer in use or to be used later after being drilled should be properly marked for visibility and capped/closed off.</p> <p>-Ensure that after completion of drilling, the exploration drill cuttings are put back into the holes, and the holes filled and levelled.</p> <p>-An emergency preparedness plan should be compiled, and all personnel appropriately trained.</p> <p>-Workers should not be allowed to consume intoxicants prior to and during working hours, or allowed on site when under the influence, as this may lead to mishandling of equipment, resulting in injuries and other health and safety risks.</p> <p>-The site is to be equipped with "danger" or "cautionary" signs at any potential danger or risk area identified on site.</p>				
	<p>Accidental fire outbreak</p>	<p>-Portable fire extinguishers should be provided on site.</p> <p>-No open fires to be created by project personnel on site.</p>	<p>No wildfires recorded (due to presence of workers)</p>	<p>Proponent</p> <p>ECO</p>	<p>Fire extinguishers (1 per vehicle) and 1 per working site</p>	<p>Throughout exploration phase</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-Potential flammable areas and structures such as fuel storage tanks should be marked with clearly visible signage.</p>				
<p>Archaeology and heritage</p>	<p>-Accidental disturbance and destruction of archaeological or heritage objects and sites</p>	<p>-A “No-Go-Area” should be put in place where there is evidence of archaeological site, historical, rock paintings, cave/rock shelter or past human dwellings. It can be a demarcation by fencing off or avoid the site completely by not working closely or near the known site.</p> <p>-On-site personnel (s) and contractor crews must be sensitized to exercise and recognize “chance finds heritage” in the course of their work.</p> <p>-During the prospecting and exploration works, it is important to take note and recognize any significant material being unearthed and make the correct judgement on which actions should be taken (refer to the CFP Appendix attached to the EMP).</p>	<p>Preservation of all artefacts and objects that are discovered on and around project site</p> <p>No-Go Areas avoided</p>	<p>Proponent</p> <p>ECO</p> <p>Operator</p> <p>Foreman</p> <p>Superintended</p>	<p>Salvage equipment</p> <p>Archaeologist</p>	<p>As and when required, i.e., prior to site set up, and during exploration.</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-The footprint impact of the proposed prospecting and exploration activities should be kept to minimal to limit the possibility of encountering chance finds within the EPL boundaries. Throughout their stay (duration of their presence) in the area, the proponent should maintain a buffer of 50 metres on all archaeological and cultural sites observed within the project site and wider area. -</p> <p>-A landscape approach to site management must consider culture and heritage features in the overall planning of exploration infrastructure within and beyond the licence boundaries.</p> <p>-The Proponent and contractors should adhere to the provisions of Section 55 of the National Heritage Act in the event significant heritage and cultural features are discovered while conducting exploration works.</p> <p>- Subject to the recommendations herein made and the implementation of the mitigation measures and adoption of the project Archaeological Management Plan (AMP) or</p>		<p>Archaeologist</p>	<p>Flag tapes</p> <p>GPS (site marking)</p>	

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>Environmental Management Plan (EMP), should be complied.</p> <ul style="list-style-type: none"> - An archaeologist or heritage specialist should be present on-site to monitor any significant earthmoving activities that may be carried out as part of the proposed project activities. -When the removal of topsoil and subsoil on the site for exploration purposes, the site should be monitored for subsurface archaeological materials by a qualified Archaeologist. -Show overall commitment and compliance by adapting “minimalistic or zero damage approach”. -In addition to these recommendations , there should be a controlled movement of the contractor, exploration crews, equipment, setting up of camps and everyone else involved in the prospecting and exploration activities to limit the proliferation of informal pathways, gully erosion and disturbance to surface and sub-surface artefacts such as stone tools and other buried materials etc. 				

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
Littering and waste management (general waste and sanitation).	Environmental Pollution	<ul style="list-style-type: none"> -Workers should be sensitized to dispose of waste in a responsible manner and not litter. -After each day's works, the Proponent should ensure that there is no waste left on the site. -All daily domestic and general project waste should be contained until it can be transported to designated waste sites in a nearby town. -No waste may be buried or burned on site or anywhere else. -The exploration site should be equipped with separate waste bins for hazardous and general or domestic waste. -Sewage waste should be stored as per the available sewage system (long drop toilets) supplied on site and regularly disposed of at the nearest treatment facility. -Oil spills should be taken care of by removing and treating soils affected by the spill. -A penalty system for irresponsible disposal of waste on site and anywhere in the area should be implemented. 	<ul style="list-style-type: none"> -No visible litter around the project area -Provision of sufficient waste storage containers. -Waste management awareness. 	ECO	<ul style="list-style-type: none"> - Waste storage containers Waste disposal permits to municipalities Environmental, Health and Safety Statements and Policy 	Throughout exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>-Careful storage and handling of hydrocarbons on site is essential, therefore should be enforced.</p> <p>-Potential contaminants such as hydrocarbons and wastewater should be contained on site and disposed of in accordance with municipal wastewater discharge standards so that they do not contaminate surrounding soils and eventually groundwater.</p> <p>-An emergency plan should be available for major/minor spills at the site during exploration (with consideration of air, groundwater, soil, and surface water) and during the transportation of the product(s) to the sites.</p>				
	<p>Wastewater generated by exploration workers living on-site.</p>	<p>-Provision of toilet facilities for workers (mobile/portable chemical toilet if possible).</p> <p>-Emptying of chemical toilets according to the manufacturer's specifications.</p>	<p>-Adequate toilet and basic ablution facilities on site.</p>	<p>Proponent ECO</p>	<p>-Chemical toilets</p> <p>-Sewage removal operator</p> <p>-waste treatment agents/chemicals</p>	<p>Throughout exploration phase</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
Air Quality	Dust generation	<ul style="list-style-type: none"> -Exploration vehicles should not drive faster than 40 km/h to avoid generating dust in the area. -Dust control measures may be considered to suppress dust, in the event that there are local complaints of high levels of dust generation. -Dust masks, eye protective glasses and other respiratory personal protective equipment (PPE) such as face masks should be provided to the workers in the drilling areas where they are exposed to dust. -Excavating equipment should be regularly maintained to ensure drilling and excavation efficiency and so to reduce dust generation and harmful gaseous emissions. 	<ul style="list-style-type: none"> -No complaints from the public about vehicle emissions and dust generation. -Visible efforts to curb dust 	ECO	<ul style="list-style-type: none"> Complaint's logbook Dust suppressant (Water) 	Throughout exploration phase
Noise	Nuisance	<ul style="list-style-type: none"> -Noise from project vehicles and equipment on the working sites of the EPL should be at acceptable levels. - Exploration hours should be restricted to between 08h00 and 17h00, or at the times agreed upon in writing between the Proponent and land owners, in order to avoid noise pollution and 	<ul style="list-style-type: none"> -Complaints from farmers and neighbouring land users about excessive noise. 	ECO	<ul style="list-style-type: none"> -Complaint's logbook -Noise protective equipment for workers 	Throughout exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>vibrations generated by exploration equipment before or after hours, as agreed upon.</p> <p>-When operating the drilling machinery onsite, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce exposure to noise.</p> <p>-All drilling activity and noise-producing activity on site must be schedule and conducted with consideration for the tranquility of any nearby residents.</p>				
Social nuisance	Local properties disturbance and values	<p>-The Proponent should inform their workers on the importance of respecting the farmers' properties by not intruding on or, damaging their houses, fences or snaring and killing their livestock and wildlife.</p> <p>-Any workers or site employees that will be found guilty of intruding peoples 'privately owned properties should face disciplinary or be dealt with as per their employer' (Proponent)'s code of employment conduct</p> <p>-The project workers should be advised to respect the community</p>	No complaints from farmers about property theft, disturbance, or intrusion	ECO	<p>Grievance logbook</p> <p>Land access agreement conditions</p>	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		<p>and local's private properties, values, and norms.</p> <p>-No worker should be allowed to wander in private yards or fences without permission.</p> <p>-Workers are not allowed to kill or in any way disturb local livestock and wildlife on farms.</p> <p>--No worker should be allowed to, without permission cut down or damage trees belonging to land owners</p>				
PROGRESSIVE REHABILITATION AND DECOMMISSIONING PHASE						
Rehabilitation	Disturbance and damaging of land	<p>-All drilled boreholes and excavated pits related to the project activities should be capped and backfilled, respectively.</p> <p>-During exploration activities, all waste generated and stored on site should be disposed of at the nearest solid waste management site.-</p> <p>-The stockpiled topsoil should be levelled as soon as the work at the sites is completed.</p> <p>--Any temporary setup on site should be dismantled and the area</p>	<p>Capped boreholes and backfilled pits</p> <p>No sign of waste or littering seen on site and around site areas.</p> <p>Carrying away of waste, and removal of vehicles and equipment from site</p> <p>No stockpiled topsoil (topsoil is levelled after</p>	Proponent	<p>Excavators and other backfilling/demolishing machinery</p> <p>Record of pits excavated, and boreholes drilled (if any)</p> <p>Waste containers on sites</p> <p>Photo records of backfilled sites</p>	<p>Progressive rehabilitation done throughout the exploration phase and complete decommission and rehabilitation done after completion of exploration works.</p>

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Resources	Timeline
		rehabilitated to its original state as much as possible. --Explored areas on construction sites should be gradually rehabilitated through stockpiling and backfilling. -Provision of both financial and technical resources for progressive rehabilitation.	completion of each work). -Campsite dismantled and materials taken away from site. -Visible signs of stockpiled topsoil.		Records of finances set aside for decommissioning activities	

4.4 Monitoring Action Plans (Monitoring Plan)

To support and ensure that the proposed mitigation measures are achieving the desired results, a monitoring plan must be implemented. The monitoring action plan recommended for the proposed exploration works is presented in **Table 3** below.

Table 3: Monitoring Action Plan

Environmental Feature	Impact	Monitoring Actions	Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Archaeology and Heritage	Presence or unearthing of archaeological or cultural heritage resources.	-To prevent destruction of artefacts and sites. Preservation of all artefacts and sites that are discovered within the site boundary or around the project site area. -Inspection of records of findings.	ECO Archaeologist	Daily	Unearthing of archaeological or cultural heritage resources	Cease all activities on site and wait for NHC to inspect site and give further instructions / actions
Soils	Loss of topsoil	All measures should be considered to prevent the loss of topsoil.	ECO and Exploration Manager	weekly	Proliferation of new vehicle tracks.	Rehabilitation of affected areas
Monitoring	EMP non-compliance	-The ECO or the Proponent/contractor should monitor the implementation of this EMP to ensure compliance. - The ECO(s) should inspect the site throughout the exploration period and after completion.	ECO	Daily	Increase in health, safety and environmental damage incidence.	Daily safety talks, Remedy the consequences
Biodiversity	Loss of biodiversity	-Comply with any marked no-go areas and avoid areas sensitive to any type of disturbance. Clear only footprint areas to maintain as much of the remaining natural vegetation on site as possible and to prevent habitat loss of habitat (if so, as advised by MEFT). -	ECO Workers involved in this phase.	Weekly	Vegetation clearance outside of marked areas.	Rehabilitation of affected areas to the satisfaction of the ECO

Environmental Feature	Impact	Monitoring Actions	Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Health and Safety	Health and safety of the workers	<p>-Workers should be trained on how to handle materials and equipment on site (if they do not already know how to) to avoid injuries.</p> <p>-Exploration equipment and materials should be securely fastened to vehicles (trucks and cars) being transported to the site. This is to ensure that the materials and equipment do not fall off the vehicles and cause injuries to anyone while transporting them.</p> <p>- All personnel are to be provided with appropriate personal protective equipment (PPE), always during exploration hours on site, to prevent serious injuries or loss of life.</p> <p>-Workers should not be allowed to consume intoxicants prior to and during working hours, as this may lead to mishandling of equipment, which may result in injuries and other health and safety risks.</p>	<p>ECO</p> <p>Worker Involved in this phase</p>	Daily/Weekly	Health and safety incident	Remedy the consequences

Environmental Feature	Impact	Monitoring Actions	Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
Neighbouring land users to the site	Disturbance	Exploration works schedule should be limited to normal working hours, between 08h00 and 17h00. This is to ensure generated noise does not become nuisance to the neighbors.	ECO Exploration Manager	Weekly	A logged complaint about excessive noise	Revision of site activities
Waste	Environmental Pollution	-The site should be always kept tidy. All domestic and general construction waste produced daily should be cleaned and contained daily to prevent environmental pollution. -Separate waste containers (bins) for hazardous and domestic / general waste must be provided on site to avoid mixing of waste.	ECO All workers involved in this phase.	Daily	-Visible litter around project site -Alogged complaint.	-Clean-up of the affected areas and ensuring exploration workers utilise waste containers provided.
Transport	Transportation of workers to and from site	-Project workers must be transported in suitable passenger vehicles to and from site to ensure workers safety. -No off-road driving.	ECO	Daily	A logged complaint about bad form of transport affecting occupational safety and health of workers	
Vehicular traffic safety	Increase in local traffic flow.	-All drivers of the project vehicles should be in possession of a valid and appropriate driving licences to operate such vehicles.	ECO	Weekly	A logged complaint about traffic increase or damage to roads.	Find alternative access roads for the team. Rehabilitation of affected roads.

Environmental Feature	Impact	Monitoring Actions	Implementation responsibility	Frequent	Threshold	Action if threshold is exceeded
		<p>-Project vehicles must be in a road worthy condition and serviced regularly to avoid accidents because of mechanical faults of vehicles.</p> <p>-Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol.</p> <p>-No heavy trucks or project related vehicles should be parked on biologically sensitive areas.</p>				

4.5 Decommissioning and Rehabilitation

Successful rehabilitation requires careful consideration of the local ecological context, in combination with rehabilitation goals. The most important steps in undertaking a successful rehabilitation are planning and environmental awareness (environmental education) on the importance of progressive rehabilitation (or post-activity rehabilitation,) and its importance to the environment. Furthermore, the rehabilitation program, the characteristics of the site, the nature of the disturbance, the rehabilitation methods, and resource availability will all play a role in the successful implementation of the planned rehabilitation.

Rehabilitation of the EPL site may include the re-vegetation of areas with species consistent with surrounding vegetation, the refilling of trenches in such a way that subsoil is replaced first, and topsoil replaced last, and where necessary, revegetation of the sites, if clearing has widely occurred due to exploration activity.

Site Specific Rehabilitation Plan

To ensure that they do their best to rehabilitate the disturbed areas, the Proponent intends to:

- Utilize stockpiled subsoil and topsoil to back fill the excavated pits and trenches.
- Make financial provision that will be used for the post-exploration rehabilitation program.
- Backfilling of all pits and trenches.
- Levelling of topsoil that was stockpiled for exploration purposes.
- Removal of project vehicles and equipment from the site and taken to designated parking facility off site.
- All project support structures such as ablution facilities (toilet and washroom systems), and storage containers/tanks shall be demolished, and the waste taken to designated waste sites. The site areas on which these structures were set up will be rehabilitated to pre-exploration state.
- All accumulated waste (hazardous, solid, and general) up until the cessation of exploration activities must be removed site and transported to designated off site waste management facilities.

Decommissioning and rehabilitation will involve the following:

- Capping of drill holes and backfilling of all excavated pits.
- Collecting and disposing of domestic waste at the nearest landfill or dumpsite.
- Leveling the stockpiled topsoil during exploration phase.
- Any temporary setup of campsites must be dismantled, and the area should be rehabilitated as far as possible to its pre-exploration state.

5 ENVIRONMENTAL MONITORING AND REPORTING

To minimize the "medium" and uphold the "low" significance ratings of impacts identified and assessed in the ESA report, monitoring reports are to be compiled and submitted to the DEAF for archiving on a bi-annual basis (every 6 months throughout the project operations) or as required by the Environmental Commissioner (as per the ECC conditions). This practice will make any considerations for ECC renewal easy as it nears expiration. Therefore, the Proponent should meritoriously monitor and submit the reports to the DEAF. The submission is not only done for record keeping purposes, but also in compliance with environmental legislation.

6 CONCLUSIONS AND RECOMMENDATIONS

In the event that the Environmental Commissioner considers ECC issuance for EPL 8798, it is recommended that an ECC for this EPL be granted, subject to the following recommendations:

- All mitigations provided in this report and the management action plans in the EMP should be implemented and monitoring conducted as recommended.
- All the necessary environmental and social (occupational health and safety) precautions provided should be adhered to.
- Sites where exploration activities such as excavated pits have ceased should be rehabilitated, as far as practicable, to their original state.
- The monitoring of the implementation of mitigation measures should be conducted, applicable impact actions taken and , reporting done and recorded as recommended in the Draft EMP.

Because the proposed prospecting and exploration area contains some sensitive environmental and social components that could be harmed, potential negative impacts from these activities were recognized, assessed, and mitigation measures implemented.. The mitigation measures indorsed in the ESA report and management action plans provided in the Environmental Management Plan can be considered adequate to elude and/or reduce the risks to acceptable levels.As a result, Excel Dynamic Solutions (Pty) Ltd guarantees that these measures are adequate for environmentally sustainable and safe exploration work on the EPL.. It is recommended that a written approval for the ECC may be issued on the condition that the provided management measures and action plans are effectively implemented on site and monitored. Predominantly, monitoring of the environmental components described in the ESA should be conducted by the Proponent and applicable competent authorities, to ensure that all potential impacts identified in this study and other impacts that might arise during implementation are properly identified in time and addressed.

APPENDIX 1: CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

Areas of proposed development activity are subject to a heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such finds.

Scope: The “*chance finds*” procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “*a person who discovers any archaeological Objectmust as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Manager/Supervisor must report the finding to the following competent authorities:

- National Heritage Council of Namibia (061 244 375)
- National Museum (061 276800),
- National Forensic Laboratory (061 240461).

Archaeological material must NOT be touched. Tempering with the materials is an offence under the heritage act and punishable upon conviction by the law.

Responsibility:

Operator: To exercise due caution if archaeological remains are found

Foreman: To secure the site and provide timely updates to management

Superintendent: To determine safe working boundary and request inspection

Archaeologist: To inspect, identify, advise management, and recover remains.

Procedure:

Action by person identifying archaeological or heritage material:

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine the GPS position if possible.
- d) Report findings to foreman

Action by the foreman

- a) Report findings, site location and actions taken to the superintendent
- b) Cease any work in the immediate vicinity

Action by superintendent

- a) Visit site and determine whether work can proceed without damage to findings
- b) Determine and mark exclusion boundary
- c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by Archaeologist

- a) Inspect the site and confirm the addition to the project GIS
- b) Advise NHC and request written permission to remove findings from work area
- c) Recovery, packaging and labelling of findings for transfer to National Museum.

In the event of discovering human remains

- a) Actions as above
- b) An archaeologist will conduct a field examination to confirm that the remains are human.
- c) Provide advice and liaison with the NHC and the police.
- d) Recovery of remains and removal to the National Museum or National Forensic Laboratory, as directed.