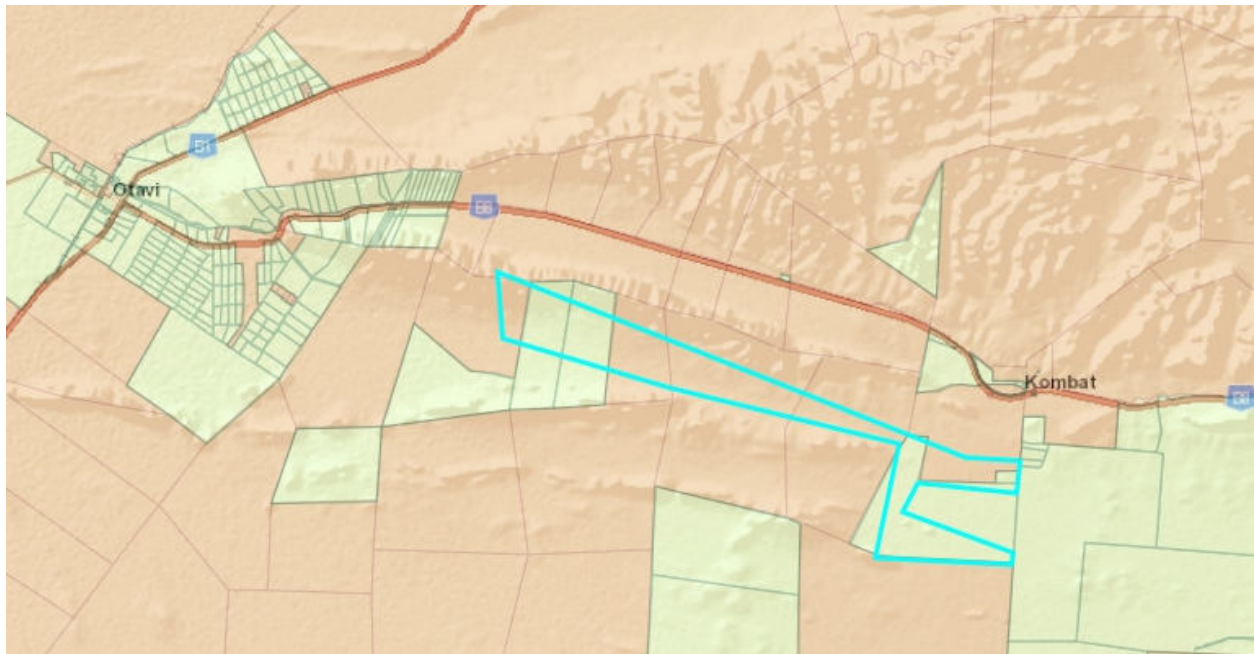




RED-DUNE CONSULTING CC

Application No: APP-000862

Application for **RENEWAL** Of Environmental Clearance Certificate For Exclusive Prospecting License Number 5233 Between Otavi And Kombat Area, Otjozondjupa Region



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CLIENT	Huab Energy Pty Ltd
PROJECT CONSULTANT	Mr. Ipeinge Mundjulu
LOCATION	Between Otavi and Kombat, Otjozondjupa Region
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ACRONYMS

DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
MEFT	Ministry of Environment Forestry and Tourism
PPE	Personal Protective Equipment
RC	Reverse Circulation
RD	Red-Dune Consulting CC
SM	Site Manager
TORs	Terms of Reference

EXECUTIVE SUMMARY

Huab Energy (Pty) Ltd is a holder of the Exclusive Prospecting: License (EPL) 5233. The company was initially issued with an ECC in 2022 and undertook Geological studies, field mapping, Soil surveys, Geophysical surveys and Drilling.

Currently the ECC is due to expire in April 2023, henceforth the company is hereby applying for the renewal of the ECC.

During exploration, there were no complaints registered with the proponent and neither with the relevant Ministries. No major activities such as drilling has taken place on this EPL. Soil samples of less 30cm deep and less were immediately backfilled after samples were collected.

Thus, the review of this EMP recommends to the approving authority for the ECC to be renewed.

1. Overview

This Environmental Management Plan (EMP) is updated resultant of the expiry of the ECC that was initially issued for EPL 5233 in April 2023.

2. Purpose of the EMP

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

3. Compliance to the EMP

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

4. Roles and Responsibility

4.1. Proponent

The proponent. Huab Energy Pty Ltd shall take overall responsibility for proper implementation of the EMP. It remains the responsibility of the proponent to appoint key personnel for the implementation of the EMP such as Site Manager and ensure that all employees and contractors are conversant with the EMP.

4.2. Site Manager

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

4.3. Employees

It shall be responsibility of employees to adhere to the provision of EMP at all times when on site

4.4. Environmental Compliance Officer

Compliance to EMP is enforced by the environmental inspector as provided for under Environmental Management Act (No. 7 of 2007) (EMA)

5. Disciplinary Action

This EMP is a legally binding document, non-compliance to the EMP is punishable in accordance to the provision of EMA

6. EPL Location

The EPL is located at Otavi area toward eastern direction in Otjozondjupa Region Figure 1 and table 1 shows the EPL coordinates points (-19.772842, 17.690423).

Table 1. GPS Coordinates for EPL 5233

Order	Lat Deg	Lat Min	Lat Sec		Long Deg	Long Min	Long Sec	
1	- 19	42	51.60	S	17	30	14.76	E
2	- 19	40	13.06	S	17	30	2.82	E
3	- 19	44	24.81	S	17	41	23.71	E
4	- 19	44	29.94	S	17	42	40.68	E
5	- 19	46	51.39	S	17	42	30.27	E
6	- 19	46	42.39	S	17	39	12.18	E
7	- 19	44	7.82	S	17	39	46.51	E
8	- 19	42	49.55	S	17	34	11.77	E

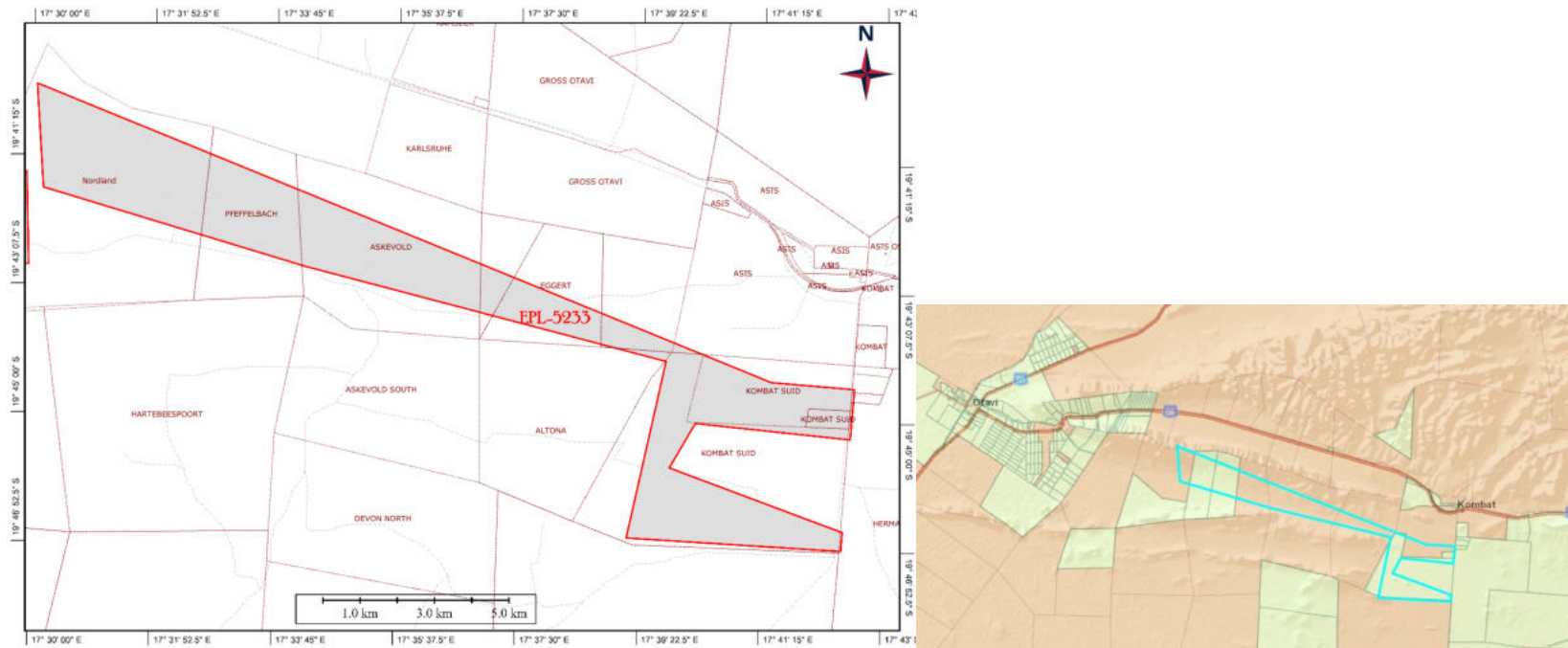


Figure 1. Location of EPL 5233

6.1. Site description

It measures 6197.82 ha and covers farm Askevold 1694, Nauesis 1695, Kaiserden, Dambeck, Pfeffelbach, Eggert, Altona, Kombat Suid, Helmanus.

7. Exploration Activities 2020-2022

7.1. Period 2020-2021

The company was first issued with an ECC in April 2020. During this period, soil geochemical survey, where a total of 330 soil samples were collected and analyzed from the Kombat South Prospect-Farm Altona. The samples were collected at 100m intervals from N-S lines spaced by 100m (Fig 2). The sample pit, which measured 10cm in diameter and ~30cm deep were backfilled immediately.

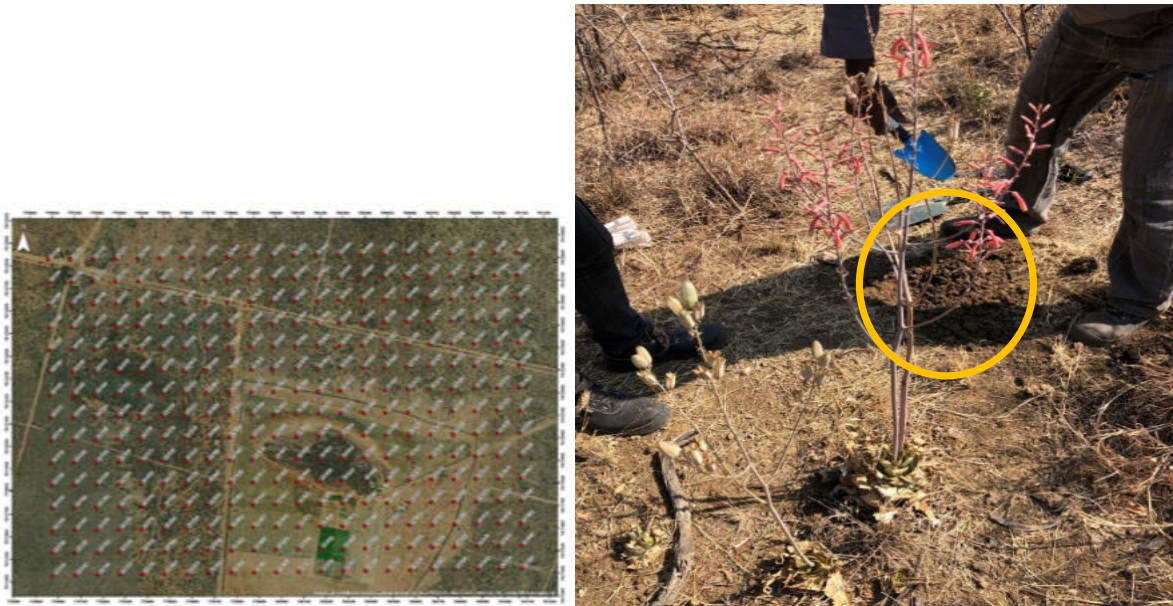


Figure 2. Soil samples at Kombat South

In 2021, data review from soil sample collected in 2020 were undertaken which informed the **Geochemical Mapping**. The mapping exercise involves a Geologist and an assistant walking over

rock units and recording of geological information observed on the rocks. Furthermore in 2021, a total of 536 soil samples were collected from the Otavi circular Prospect located on farm Rentes. The samples were collected at 50m intervals from traverse with 400m spacing. The sample pits were back filled immediately after collection (Fig 3).



Figure 3. Back filled Soil Sample

7.2. Period 2022

During 2022, Data Review for samples collected including regional assessment of historical geochemical soil data and geophysical data, particularly the aero-mag data was undertaken. Furthermore, 772 soil samples were collected along long N-S traverses spaced by 100 meters, were undertaken at the Askevold Valley farms; Askevold, Phaffelbach, Noordland and Eggert. These samples were collected using a hand-held auger. The pits measuring ~10cm in diameter were dug to a depth of ~30cm using an auger, upon which a soil sample was collected and were immediately backfilled.

8. Policy, Legal and Administrative Framework

Table 2. Regulatory framework applicable to the project

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

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

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

9. The EMP table

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
<p>Access</p> <p>Access to farms must be communicated land owners to avoid conflict</p>	<p>To avoid conflict between farmers and Huab</p>	<ol style="list-style-type: none"> 1. Inform land owners well in advance before your planned activities 2. Ensure access agreement is place 	<p>Recorded conflict</p>	<p>Site Manager</p>
<p>Induction</p>	<p>To ensure that all employees are familiar with the requirements of the EMP</p>	<ol style="list-style-type: none"> 1. All employees must go through an induction course for the provision of the EMP. 2. Staff operating specialised equipment and heavy vehicle must be properly trained 	<p>Induction Minutes, report and Attendance Register</p>	<p>Site Manager</p>
<p>Employment</p>	<p>Although significant employment is not expected, the proponent must abide to the relevant labour laws</p>	<ol style="list-style-type: none"> 1. Ensure that all general work is reserved for local people unless in circumstances where specialized skills are required. 2. Fair compensation and labour practise as per Namibian Labour Laws must be followed 3. Ensure skill transfer to the locals 	<p>Employees records and their nationalities Labour unrest over unfair compensation</p>	<p>Site Manager</p>

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
HIV/AIDS, Alcohol and Drug abuse	To sensitise employees about the danger of alcohol, drugs and HIV/AIDS	<ol style="list-style-type: none"> 1. Provide awareness to the employees on danger of alcohol, (HIV/AIDS) and drug abuse 2. Provide Condoms at on site 	Awareness meeting minutes	Site Manager
General Safety	To ensure good health and safety for the employees and public	<ol style="list-style-type: none"> 1. Abide by the Occupational Health and Safety and Labour Act of Namibia and other statutory requirement such as International Labour Practise (ILO) 2. Develop a health and safety plan / policy 3. Ensure that every employee went through an induction course about safety; 4. Employees must be equipped with all necessary Personal Protective Equipment (PPE). These includes, Helmet, Overall, Safety Shoes, Safety Glasses, Gloves, Earmuff etc; 5. During operation, minor accidents are eminent, hence there must be a first aid kit; 6. Only qualified and licenced personnel must be allowed to operate machinery and vehicles; 	Induction Minutes Valid driver licenses for heavy vehicles Complain of health issues by employees PPE for all employees	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<ul style="list-style-type: none"> 7. No employee must be allowed to be onsite without PPE; 8. Adequate safety signs must be displayed on site; 9. Unauthorised fire shall not be permitted on site 		
Health	To ensure good health for the employees	<ul style="list-style-type: none"> 1. Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. 2. Adhere to the Labour act, non-toxic human dust exposure levels may not exceed 5mg/m³ for respiratory dust and 15mg/m³ for total dust. 3. Supply clean drinking water to the site, such as portable water tank; 4. There must be suitable, clean and user-friendly ablution facilities. 5. Ensure that supervisor has gone through occupational health and first aid course, 6. Train employee on hazard and risk avoidance 7. Provide insect repellent, mosquito nets and if necessary immunization to prevent deadly diseases such as malaria 	Health complaints from employee and employees fitness certificate	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		8. All employees must be in possession of the health certificate and screened for communicable diseases such as TB.		
Visual Impact	To prevent litter / waste scattered all over and preserve aesthetic value	1. Maintain good house keeping 2. Trenches, access roads , camping places must be rehabilitated and kept clean	Scattered Litter, Visual inspection	Site Manager
Impact on Flora	To ensure sustainable conservation the vegetation	1. Mature trees must be avoided to be cut down 2. Do not plant alien trees 3. Don not harvest firewood	Complain and records	Site Manager
Impact on Fauna	To ensure protection of animals especially wild animals	1. Do not kill animals if found on site (unless it is an eminent danger to human life) 2. There must be ZERO tolerance to poaching 3. The food must be stored in the closed place in order not to attract baboons	Complaints from farmers and record of poaching	Site Manager
Conservation of Ground Water Resource	To prevent exposure of ground water	1. Ensure that drilled holes are properly closed to prevent ground water exposure	Rehabilitated drilled sites	Site Manager
Surface and Ground water pollution	To prevent water pollution	1. Fueling of heavy vehicle on site must be well coordinated at designated places 2. Stationary vehicles must be provided with drip tray	Physical inspection	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		<p>to capture oil, lubricants and hydraulic fluids leakages</p> <p>3. All vehicle and machinery must be well service to avoid leakages</p> <p>4. Provide and train on oil spill emergency response</p> <p>5. Servicing of vehicles and machinery must take place at designated sites</p>		
Land Degradation	To prevent soil erosion	1. Movement of heavy vehicles must be coordinated and restricted to be on access roads	Physical inspection	Site Manager
Waste Generation	To ensure good housekeeping and prevent littering	<p>1. Provide Skip bins to collect waste and be disposed of at an approved disposal site</p> <p>2. Do not burry waste on site</p> <p>3. Excavate a small biodegradable waste site that would be dump filled at the end of the project</p> <p>4. Used oil, grease and lubricants cans must be collected in appropriate drums and disposed of at an approved site.</p>	<p>Waste bins on site</p> <p>Physical inspection</p>	Site Manager
Noise Impacts	To prevent noise pollution from flying aircraft	<p>1. The aircraft must fly at heights which may not cause noise nuisance to animals</p> <p>2. A fixed wind air craft is recommended than a</p>	Complaints from farmers and members of public	Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
		helicopter 3. Confirm flying schedules with farmers, whose operation is tourism related		
Traffic	To ensure coordinated movement of heavy vehicles	1. Trucks must be installed with a rotating headlight beam lights 2. Truck must maintain a low speed to prevent excessive dust and accident 3. The roads must be maintained by scrapping and compacting 4. Install warning signs where necessary	Records of public complain Visible warning signs	Site Manager
Oil Leakages	Manage fuels, oils and lubricants leakages from Vehicles and Machinery to prevent pollution	1. Ensure all vehicle are well service and leak inspection are done; 2. Provide drip trays to stationary vehicle 3. Servicing of vehicle must be done at an approved site; 4. Re-fuelling, oil replacement must be done on approved sites;	Physical verification and routine monitoring	Management or Site Manager
Archaeology / Heritage	Preserve Heritage	1. Employee must be trained on the possible find of archaeological material in the area; 2. Implement a chance find and steps to be taken when	Sighting report/s of heritage resources / artefacts	Management or Site Manager

Environmental / Social Impact	Objectives	Proposed Mitigation Measures	Monitoring Indicator	Party Responsible
Resources / Artefacts		<p>archaeological material finding (Heritage (rock painting and drawings), human remains or artefacts) are unearthed</p> <p>Stopping the activity immediately</p> <ul style="list-style-type: none"> i. Informing the operational manager or supervisor ii. Cordoned of the area with a danger tape and manager to take appropriated pictures. iii. Manager/supervisor must report the finding to the National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461). 		

10. Closure / Decommissioning Plan

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

11. Conclusions and Recommendations

1.1. Conclusion

The following are points of consideration;

- The review of the Environmental Management Plan found it to be adequate, practical and efficient towards the improvement of environmental sustainability;
- The ECC is due for renewal in April 2023;
- In accordance to the activities undertaken and consent from farmers affected, there were no red-flags or complaints from farmers about environmental performance;
- With adequate implementation of the EMP, the project is not expected to pose harm to the environment.

1.2. Recommendations

- It is recommended to the approving authority to approve the renewal of the Environmental Clearance Certificate.
- It is further recommended to the approving authority conduct site inspection of site, especially the drilled site and establish cordial relationship with farmers' associations whom are crucial at monitoring the exploration activities in order to ensure compliance to the law and the EMP.

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