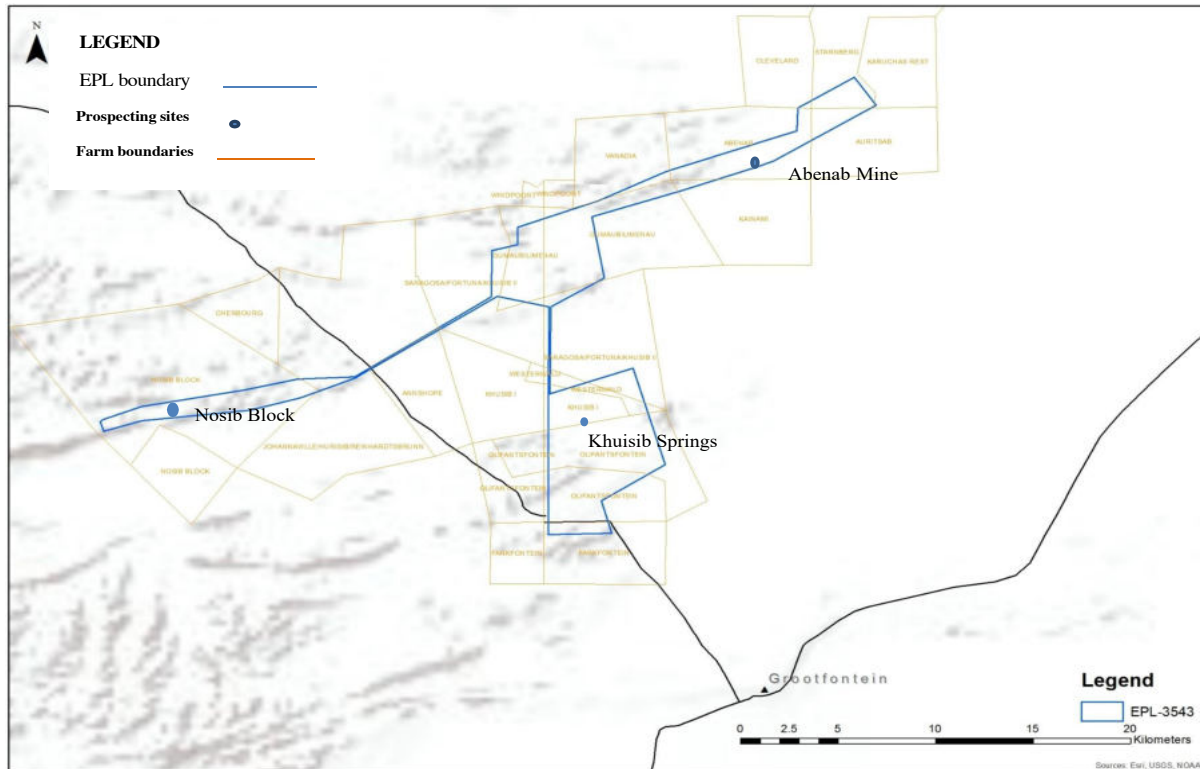




RED-DUNE CONSULTING CC

Application For the **RENEWAL** Of Environmental Clearance Certificate For EPL 3543 Located In The Area Between Tsumeb, and Grootfontein Otjozondjupa Region



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DOCUMENT INFORMATION

Proponent	Huab Energy Pty Ltd
License Number	EPL 3543
Location	Between Grootfontein and Tsumeb, 15 Km North East of Grootfontein, Otjozondjupa Region
Stage	Final
Author	Ipeinge E. Mundjulu
Aim	RENEWAL of Environmental Clearance Certificate
Date	24 th January 2023

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ACRONYMS

AIDS	Acquired Immune Deficiency Syndrome
DEA	Department of Environmental Affairs
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
HIV	Human Immune Virus
MEFT	Ministry of Environment Forestry and Tourism
MME	Ministry of Mines and Energy
RC	Reverse Circulation
RDC	Red-Dune Consulting CC

Acknowledgements

The renewal of this Environmental Clearance Certificate follows an existing Environmental Management Plan (EMP) for the Exclusive Prospecting License 3543 that was approved by the office of the Environmental Commissioner. This EMP was developed by SLR Consulting Namibia.

Initially, Red-Dune Consulting has reviewed the EMP for purposes of renewing the Environmental Clearance Certificate as requested by Huab Energy Pty Ltd in 2019. Again in 2022, the company requested Red-Dune Consulting to review the EMP and apply for the renewal of the ECC.

Red-Dune Consulting continues to acknowledge the great work that was first done by SLR Consulting. This document remains the property of Huab Energy Pty Ltd. Red-Dune Consulting does not claim full copy right to this document.

Executive Summary

Huab Energy (Pty) Ltd is a holder of the Exclusive Prospecting: License (EPL) 3543. The EPL was granted in 2011, exploration is a listed activity under the Environmental Management Act (Act No. 7 of 2007) that may not be undertaken without an Environmental Clearance Certificate (ECC). The company was initially issued with an ECC in 2014 and undertook Geological studies, field mapping, Soil surveys, Geophysical surveys and Drilling (Reverse Circulation) between 2014 and 2017. The ECC was renewed in January 2017 where bi-annual and rehabilitation reports detailing undertaken activities were submitted, which formed the basis of the ECC renewal.

For the period between 2017 to 2019 no exploration activities took place, hence the state of the environments remained the same since the renewal of the ECC in 2017 and the ECC for this period was due to expire in January 2020. Consequently, the company applied for the renewal in 2019 for the period of 2020-2022 which was granted.

Currently the ECC for the period 2020-2022 expired in December 2022, henceforth the company is hereby applying for the renewal of the ECC to cater for the period of December 2022 – December 2024.

Between 2019 to 2020, no exploration activities were undertaken on the EPL. During this period the company focused on completing development studies of the projects under EPL-3543, including Metallurgical test work and processing studies of the Abenab vanadium ore, incorporating preliminary mining studies of the deposit based on the 2019 resource update.

While between 2020-2021, various exploration activities such as line cutting, drilling, Geochemical Soil Sampling, Trenching, were undertaken at Khusib Springs and Nosib Project sites. Drill site, line cutting and trenches were properly rehabilitated. While minor oil spill during handling of hydraulics and engine oils were picked up and disposed off at the an approved disposal site at Grootfontein.

1. Introduction

Huab Energy (Pty) Ltd was granted an Exclusive Prospecting License EPL 3543 as per the Mineral Resource Act 1992. Exploration is a listed activity under Environmental Management Act (Act No. 7 of 2007) (EMA), that may not be undertaken without an Environmental Clearance Certificate (ECC). The company was initially issued with an ECC in 2014.

In accordance with EMA, the ECC is valid for a period of three years and Section 56 of EMA provides for the renewal of the ECC. In accordance with this provision, the ECC was renewed in 2017 for the period of 2017-2019 as well as in 2019 for the period between 2019-2022. The renewed ECC of 2019 has expired in December 2022. Correspondingly, the company is hereby applying for the third renewal of the ECC for EPL 3543 for the period of 2022-2024.

2. Overview of the project

2.1.1. Location

The EPL 3543 is located in the area between Tsumeb and Grootfontein (Figure 1). The center of the EPL is located at 19.63250000 S, 17.58666667 E. The EPL covers an area of 4334.35 hectares. It covers several commercial farms, whose main land use is agriculture, predominantly cattle farming.

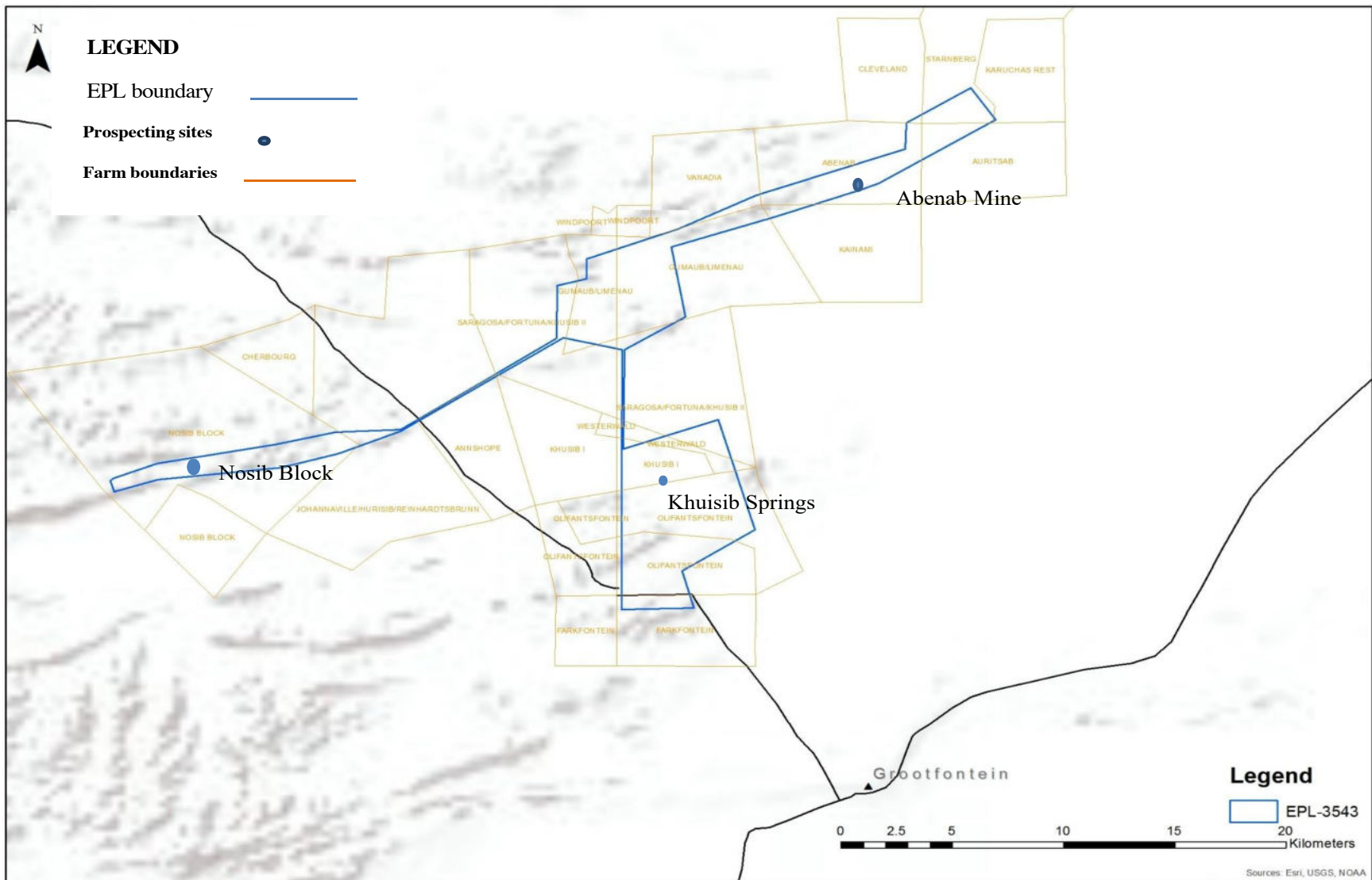


Figure 1. Location of EPL 3543

2.1.2. Exploration activities

2.1.3. Period 2014-2017

The company was issued with an ECC in 2014. The following exploration activities took place; Geological studies and field mapping, Soil surveys, Geophysical surveys, and Drilling (Reverse Circulation) between 2014 and 2017. The ECC was renewed in January 2017 where bi-annual and rehabilitation reports detailing undertaken activities were submitted and formed the basis of the ECC renewal.

2.1.4. Period 2017-2019

For the period between 2017 to 2019 no exploration activities took place. The company applied for the renewal of the ECC which was granted and due to expire in December 2019. (Annex 1).

2.1.5. Period 2019-2022

(a) 2019 to 2020

Between 2019 to 2020, no exploration activities were undertaken on the EPL. During this period the company focused on completing development studies of the projects under EPL-3543, including Metallurgical test work and processing studies of the Abenab vanadium ore, incorporating preliminary mining studies of the deposit based on the 2019 resource update.

(b) 2020 to 2021

Between December 2020 and December 2021, the company undertook the following activities; Drilling, Trenching, Ground Electromagnetic Survey, Line Cutting and, Geochemical Soil Sampling at two target site; Khusib Springs and Nosib Project.

i. Khusib Springs

At Khusib Springs, the company, using RC Drill, undertook 10 drill holes in April 2021 with a depth range of 10-90m. While in August 2021, 8 drill hole were drilled using Diamond Drilling with a depth range of 20-540m.

In addition, Ground Electromagnetic Survey was undertaken. The geophysical measurements were taken at 50m intervals from 850m traverses and separated by 100m spacing. The traverse lines required clearing of non-protected vegetation to create access of about 1m for the geophysical technicians and their equipment along the traverses.



Figure 2. The traverse line and technician undertaking Ground Electromagnetic Survey

Lastly at Khusib Springs, Geochemical Soil Sampling was undertaken where soil samples were collected from 30cm pits measuring about 15cm in diameter. The samples were collected along traverses separated by 100m spacing at 50m intervals. A total of 650 samples were collected.

ii. Nosib Project

At Nosib prospect a two phased drill program was undertaken between April and December 2021. The first program comprised of 15 RC drill holes that has a depth range of 40-101m. The second drill program was undertaken by diamond drilling, where a total of 7 drill holes were undertaken at the depth range of 80-140m deep. Furthermore, 3 drill holes were drilled by means of coring with one vertical and two inclined drill holes.

It was only at Nosib project where three (3) trenches of about 20m long with a depth range of 0.5-2m were dug. The trenches were localized within the historical mine site at Nosib. The trenches were dug using a Tractor-Loader-Backhoe (TLB) to allow bulk sampling of in-situ mineralization.

3. Environmental Mitigation Actions

3.1. General waste and Oil spill

Minor oil spills from handling of fuel, oils and lubricants occurred and contaminated soils were immediately picked up. General waste was also picked up immediately and disposed at the Grootfontein disposal site.



Figure 3. General waster and spill kit at the drill site

3.2. Drilled holes

The drill holes were cased up to 3-18m with pvc casing to keep the drill holes from collapsing, upon completion of the drilling, the casing was cut to ground level and capped. The Reverse Circulation sample bags were removed and disposed of appropriately.



Figure 4. PVC casing cut to the ground and capped

3.3. Access roads to drill sites

Tracks leading to drill sites were leveled which allows smooth revegetation



Figure 5. Track to access road before and after rehabilitation

3.4. Trenches

Two of the sampling trenches were back-filled as soon as the sampling was completed.



Figure 6. A Trench before and after backfilled

One trench was left open for further sampling work. This trench is fenced off to prevent cattle and wild animals from falling in.



Figure 7. A Fenced Trench

3.5. Soil Sample Pits

Soil sample pits were immediately backfilled after a sample was collected.



Figure 8. A 30cm soil pit before and after it is backfilled

4. The Environmental Management Plan

4.1. 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.

4.2. Compliance to the EMP

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

4.3. Roles and Responsibilities

4.3.1. Proponent

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

4.3.2. Environmental Compliance Officer (ECO)

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

4.3.3. Site Manager

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

4.3.4. Employees

It shall be responsibility of employees to always adhere to the provision of EMP when on site.

4.4. Disciplinary Action

4.4.1. Proponent

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

5. The EMP Tables Mitigation Measure and Commitments

This EMP table is not altered as provided from the proponent. The EMP was developed by SLR Consulting. Red-Dune reviewed the EMP, the gaps /comments are provided in red.

Table 5-1 Field Mapping, Geophysical Surveys And Soil Sampling

Activity	Potential Impact	Management and Mitigation Measures	Monitoring Indicators	Action Plan	
				Frequency	Responsible Parties
Air survey	Noise	<ul style="list-style-type: none"> • Discuss flight plans and schedule with land owners prior to air surveys. • Avoid residences, game and livestock enclosures where possible. 	<ul style="list-style-type: none"> • Complaints from farmers and members of public 	Prior to air surveys	Project Manager Pilots
Ground survey, mapping and soil sampling	Socio-economic	<ul style="list-style-type: none"> • Honour agreements set out in the site-access contracts • Consult and provide feedback regarding activities on the individual properties • Provide contact details to a designated Huab Energy Pty Ltd person, who will serve as liaison between landowners and the exploration teams 	<ul style="list-style-type: none"> • Record of Conflicts between Huab and Farmers / Land Owners 	Duration of mapping and surveying	Project Manager Site supervisor

Activity	Potential Impact	Management and Mitigation Measures	Monitoring Indicators	Action Plan	
				Frequency	Responsible Parties
		<ul style="list-style-type: none"> Land owners to be provided with a list of all people working on site 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. 			
	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 minimized as far as is practically possible. Huab Energy will implement a zero tolerance policy with regards to the killing or collecting of any biodiversity. This applies to people directly employed by Huab Energy as well as any contractors working on 	<ul style="list-style-type: none"> Record Complains from farmers Footprint to cut down trees Report of fires Complaints from farmers and record of poaching 	Duration of mapping and surveying	Project Manager Site supervisor

Activity	Potential Impact	Management and Mitigation Measures	Monitoring Indicators	Action Plan	
				Frequency	Responsible Parties
		<p>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. • No open fires will be permitted on site. • Speed limits will be enforced so as to prevent road kills. • Permits will be required for the removal of protected tree species. 			
	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"> • Complain of dust pollution 	Duration of mapping and surveying	Project Manager Site supervisor

Activity	Potential Impact	Management and Mitigation Measures	Monitoring Indicators	Action Plan	
				Frequency	Responsible Parties
	Heritage	<ul style="list-style-type: none"> • Employee must be trained on the possible find of heritage and archaeological material in the area. • In the event that 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; <ul style="list-style-type: none"> • Inform the operational manager or supervisor • Cordoned of the area with a danger tape and manager to take appropriated pictures. • Manager/supervisor must report the finding to the competent authorities National Heritage Council of Namibia (061 244 	<ul style="list-style-type: none"> • Sighting report/s of heritage resources / artefacts 	Duration of mapping and surveying	Project Manager Site supervisor

Activity	Potential Impact	Management and Mitigation Measures	Monitoring Indicators	Action Plan	
				Frequency	Responsible Parties
		<p>375) National Museum (+264 61 276800) or the National Forensic Laboratory (+264 61 240461).</p> <ul style="list-style-type: none"> • An appropriate heritage specialist will be appointed to assess the find and related impacts; and • Permitting applications will be made to the necessary authorities, if required. • In the event that any graves are discovered during the exploration activities, these will be avoided and preserved as a first priority. If damage is unavoidable, prior to damaging or destroying any identified graves, permission for the exhumation and relocation of 			

Activity	Potential Impact	Management and Mitigation Measures	Monitoring Indicators	Action Plan	
				Frequency	Responsible Parties
		<p>graves must be obtained from the relevant descendants (if known) and the relevant local and provincial authorities</p>			

Table 5-2 Drill Site Establishment

Activities	Potential Impact	Management and Mitigation Measures	Monitoring Indicator	Action Plan	
				Frequency	Responsible Parties
<ul style="list-style-type: none"> - Access the drill site using a new access track where necessary - Set-up drilling machine with drip trays and groundsheets - Strip vegetation and topsoil (up to 300mm where available) - Temporarily store topsoil adjacent to drill site - Set-up ablution facilities - Set-up fuel and 	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 • Minimize new access route development (routes to be approved by land owners prior to development) 	• Same as Above	On-going	Project Manager Site supervisor
	Noise	<ul style="list-style-type: none"> • Vehicles will travel maximum 30 km/hour near houses/settlements 	• Complains from farmers	Ongoing	Project Manager Site supervisor
	Biodiversity	<ul style="list-style-type: none"> • Refer to biodiversity management measures relating to ground surveying, mapping and sampling (Table 4-1). • Honour agreements set out in the site-access contracts, specifically relating to the areas 	• Same as above	Ongoing	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Monitoring Indicator	Action Plan	
				Frequency	Responsible Parties
lubricants storage area - Waste management		<p>utilized for game and livestock farming. Special consideration should be given to the sensitive hunting season.</p> <ul style="list-style-type: none"> • Provide appropriate toilet facilities for the exploration workers on the site or agree with landowner to use certain facilities on the farm. 			
	Land use	<ul style="list-style-type: none"> • Access agreements to be prepared and approved prior to drill site establishment. • The footprint of the area to be disturbed will be minimized as far as is practically possible. • Movement of heavy vehicles must be coordinated and restricted to be on access roads • Normally, gravel roads are meant for light vehicles, exploration vehicles have the potential to damage the farm access roads. 	Physical Inspection and Complain Records	Ongoing	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Monitoring Indicator	Action Plan	
				Frequency	Responsible Parties
		<p>Hence proper road maintenance must be implemented to ensure that the roads are left on good state</p> <ul style="list-style-type: none"> • Areas used as laydown areas are to be raked and/or ploughed to encourage re-vegetation • Agree on relevant compensation with land-owners where land uses are impacted 			
	Heritage	<ul style="list-style-type: none"> • Refer to heritage management measures relating to ground surveying, mapping and sampling (Table 4-1) 		Ongoing	Project Manager Site supervisor
	Socio-economic	<ul style="list-style-type: none"> • Refer to socio-economic management measures relating to ground surveying, mapping and sampling (Table 4-1) 		Ongoing	Project Manager

Table 5-3. Drilling

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> - Drill borehole - Contain all drilling water in the sump and allow to settle - Log the drill core and place on core trays - Maintain ablution facilities 	Contamination of soil/Hydrocarbon spillages	<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 refueling and any maintenance of vehicles will take place on impermeable surfaces. • Pollution will be prevented through basic infrastructure design and through 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 contractor • Huab Energy will establish environmental awareness in employees and contractors • A PVC lined sump will be used for collection of oils and silt contained in the drilling water • Any spills will be contained and cleaned up immediately 	On-going for all drilling activities	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		<ul style="list-style-type: none"> • Non-toxic and biodegradable drilling lubricant will be used • Used oil, grease and lubricants cans must be collected in appropriate drums and disposed of at an approved site. 		
	Groundwater contamination	<ul style="list-style-type: none"> • Refer to management measures relating to contamination of soils. • 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 the exploration workers on the site or agree with landowner to use certain facilities on the farm. 	On-going for all drilling activities	Project Manager Site supervisor
	Air quality deterioration	<ul style="list-style-type: none"> • Vehicle speeds will be limited to 40km/h on access routes to limit dust. • The movement of drilling related vehicles on unpaved access track will be on a small scale. • Water sprays can be used around the lay-down area when a drill-site is located 	On-going for all drilling activities	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		<ul style="list-style-type: none"> • near settlements (or sensitive land-use areas, i.e. horticultural areas). 		
	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 land owners prior to initiation. • Vehicles will travel maximum 30 km/hour near houses/settlements. 	On-going for all drilling activities	Project Manager Site supervisor
	Land use	<ul style="list-style-type: none"> • Refer to land use management measures relating to drill site establishment (Table 4-2) 	On-going for all drilling activities	Project Manager Site supervisor
Water abstraction	Groundwater quantity	<ul style="list-style-type: none"> • Water use licenses in terms of the Water Resource Management Act (Act No. 11 of 2013) will be obtained for all boreholes. • Water levels will be measured prior to abstraction, during abstraction (daily) and after completion. Levels will be reported to land owners. 	On-going for all drilling activities	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		<ul style="list-style-type: none"> Should water be reached during drilling the landowners will be informed. Should the landowners wish it; the holes will be cased and left for use by the farmers (liability relating to the boreholes will then be transferred to the landowners). 		

Table 5-4. Relevant to All Exploration Activities

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
All exploration activities	Social – provision of toilet facilities and other Socio Economic Impacts (Employment, Alcohol and Drug Abuse,	<ul style="list-style-type: none"> Provide appropriate toilet facilities for the exploration workers on the site or agree with landowner to use certain facilities on the farm. <p>Employment</p> <ul style="list-style-type: none"> Recruit locals for unskilled labour Where possible, procure materials from local suppliers <p>Alcohol and Drug Abuse</p> <ul style="list-style-type: none"> Ban the use of alcohol and drugs at work place 	On-going for all exploration activities	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
	HIV and AID	<ul style="list-style-type: none"> • Teach employees about dangers alcohol and substance abuse • All employees must be screen with the breathalyser to avoid intoxicated personnel on site <p>HIV and AIDS</p> <ul style="list-style-type: none"> • Provide HIV / AIDS awareness at induction • Avail Condoms at the mine site 		
	Waste Management	<ul style="list-style-type: none"> • Waste generated will be handled in accordance with the contract signed with the landowner. • Suitable receptacles for waste disposal will be provided at appropriate locations on site. These receptacles will be clearly marked for different waste types. • Employees and contractors will be shown the importance of correct waste disposal as well as waste minimization and recycling. • Waste will be removed from site and disposed of at a suitable licensed waste disposal facility. 		Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
		<ul style="list-style-type: none"> Hazardous waste (including hydrocarbon contaminated material/soil) will be disposed of at a licensed hazardous waste disposal facility. 		

Table 5-5. Closure and Rehabilitation

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<p>General closure activities:</p> <ul style="list-style-type: none"> - Close drill holes (unless otherwise agreed with farmers) - 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 	<p>Groundwater and surface water contamination</p>	<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 refueling and any maintenance of vehicles will take place on impermeable surfaces. • Pollution will be prevented through basic infrastructure design and through 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 	<p>Once- Closure of drill site</p>	<p>Project Manager Site supervisor</p>
	<p>Noise pollution</p>	<ul style="list-style-type: none"> • Vehicles will travel maximum 30 km/hour near houses/settlements. 	<p>On-going</p>	<p>Project Manager Site supervisor</p>

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
subsidence) and plug borehole (unless an agreement is in place with landowner for alternative uses) - Move drill core trays, ablution facilities, water bowser, stores and drill rig from the site - Dispose of any general waste to a permitted landfill site - Remove temporary fencing - Rip and plough compacted areas	Contamination of soils	<ul style="list-style-type: none"> Refer to management measures relating to contamination of water 	On-going and closure	Project Manager Site supervisor
	Air quality deterioration	<ul style="list-style-type: none"> Vehicle speeds will be limited to 40km/h on access routes to limit dust. The movement of drilling related vehicles on unpaved access track will be on a small scale. 	On-going	Project Manager Site supervisor
	Soil erosion	<ul style="list-style-type: none"> Impacted footprints are to be raked and/or ploughed to encourage re-vegetation Access routes will be ripped unless the land owners wish for them to remain. A monitoring program will be implemented to establish re-vegetation progress Agree on relevant compensation with land-owners where land used for hunting purposes is impacted 	Starts at closure, continues for a pre-determined time (as stated in agreements)	Project Manager Site supervisor

Activities	Potential Impact	Management and Mitigation Measures	Action Plan	
			Frequency	Responsible Parties
<ul style="list-style-type: none"> - Replace topsoil over disturbed area - Rehabilitate access track by ripping - GPS marker to identify - drill site 	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 	Once off	Project Manager Site supervisor
	Land use	<ul style="list-style-type: none"> • Land owners will be invited to carry out site inspections following rehabilitation in order to ensure that it has been carried out suitably. 	Post-closure	Project Manager Site supervisor

6. Conclusion and Recommendations

6.1. 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 was due for renewal in December 2022;
- 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.

6.2. 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.

7. Reference

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- J.E. Misiewicz 1988., The Geology and Metallogeny of the Otavi Mountain land, Damara Orogen, Swa/Namibia, with particular reference to the Berg Aukas Zn·Pb-V Deposit - A Model of Ore Genesis

8. Appendixes

Appendix 1: Environmental Clearance Certificate 2017-2019


REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

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Enquiries: Ms. Rikka Shikongo

Chr Robert Mugabe &
Dr Kenneth Kaunda Street
Private Bag 13306
Windhoek
Namibia

24 January 2017

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

The Managing Member
Huab Energy Pty Ltd
P.O. Box 87100
Eros
Windhoek

**MINISTRY OF MINES
AND ENERGY**
MINING COMMISSIONER
02 FEB 2017
Private Bag 10487
F1 9000 WINDHOEK
OFFICIAL

Dear Sir/Madam

SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE EXCLUSIVE PROSPECTING LICENSE 3543, OTAVI- GROOTFONTEIN, OTJOZONDJUPA REGION


Environmental Management Plan submitted is sufficient as these have made an adequate provisions of the environmental management concerning the proposed activities. From this perspective regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored from time to time.


This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project.


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

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

Yours sincerely,


Teofilus Nghitila
ENVIRONMENTAL COMMISSIONER





"Stop the poaching of our rhinos"

All official correspondence must be addressed to the Permanent Secretary

Appendix 1: Environmental Clearance Certificate 2019-2022

ECC – 00424 Serial: fuveaA424



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT AND TOURISM
OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

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

TO

Huab Energy PTY LTD
P.O Box 5, Kombat

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

Mining Exprolation in the Exclusive Prospecting License (EPL) 3543 in the area between Otavi, Grootfontein and Tsumeb


DEPUTY ENVIRONMENTAL COMMISSIONER



Issued on the date: 2019-12-13
Expires on this date: 2022-12-13

(See conditions printed over leaf)



This certificate is printed without erasures or alterations