COPY

EPEMBE MINING (PTY) LTD

A MEMBER OF

NAMIBIA CRITICAL METALS INC.

09 February 2022

The Environmental Commissioner
Ministry of Environment Forestry and Tourism
c/o Robert Mugabe and Uhland Streets
Windhoek

For Attention: Mr. Timoteus Mufeti,

Dear Sir,

Renewal of Environmental Clearance Certificates (ECC) for EPL/MDRL 3299

1. Epembe Mining (Pty) Ltd (Epembe), hereby submits its renewal applications for EPL 3299 located in Kunene Region.

2. The EPL has been converted to an MDRL and the proponent wishes this renewal to be issued in the name of the MDRL.

3. All the company prospecting activities on the EPLs have been conducted in an environmentally and socially sensitive way.

4. The Table below gives detail on the EPL/MDRL granted to Epembe and provides basic information on the mineral categories being explored as well as the size of the EPL/MDRL.

5. In the light thereof, we attach hereto the duly completed Form1 **(Annexure A)**, duly stamped in the amount of N$300.00, representing the prescribed fee.

6. **Annexure B** provides a copy of the existing ECC for EPL 3299

7. **Annexure C** provides the proof of submissions of the bi-annual reporting for past 6 periods

Should you require any further information, please do not hesitate to contact us.

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
DIRECTORATE OF ENVIRONMENTAL AFFAIRS
10 FEB 2022
RECEIVED
Signature

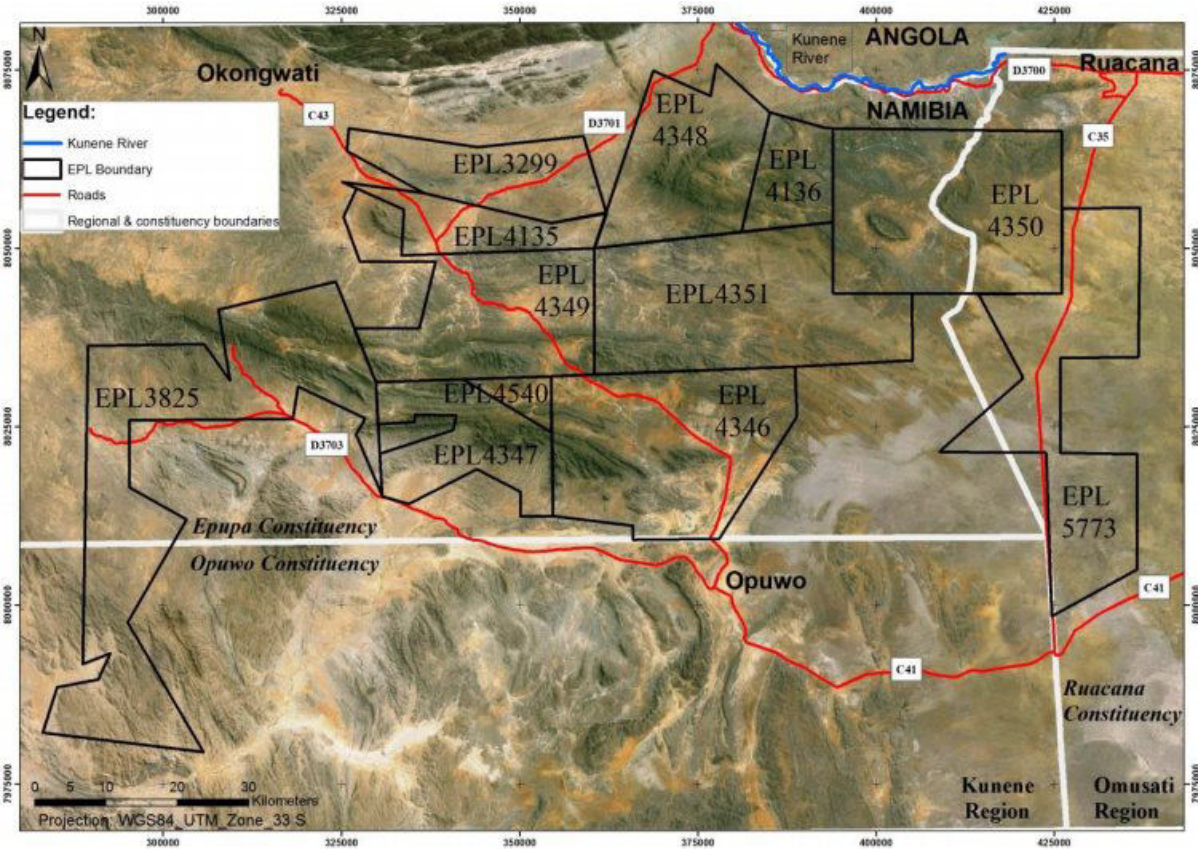
Yours sincerely,

Oliver Krappmann
Geokey Consult cc
oliver@gecko.na

Table: Epembe Project Licence Overview

License Number	Name	Location / area	Commodities	License Holder	Size (ha)
EPL 3299	Epembe Mining	Epembe, Kunene	BRM, IM, PM, PS	Former Gazania 25/Epembe Minerals (Pty) Ltd	29,050
MDRL 3299	Epembe Mining	Epembe, Kunene	BRM, IM, PM, PS	Former Gazania 25/Epembe Minerals (Pty) Ltd	29,050

ENVIRONMENTAL SCOPING AND MANAGEMENT PLAN FOR THE *KAOKO PROJECT*, KUNENE AND OMUSATI REGIONS, NAMIBIA



20 January 2016

Prepared by:

environmental consulting

Prepared for:

KUNENE RESOURCES

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7 Environmental Management Plan

7.1 Goal, Aim and Structure of the Environmental Management Plan

The ultimate goal of an Environmental Management Plan (EMP) is to ensure that the physical, biophysical and socio-economic objectives are met to such an extent that the overall product of the activity will not result in a net negative impact.

The aim of the EMP is to assist KRN and their Contractor(s) to ensure that the day-to-day operations are carried out in an environmentally responsible manner, thereby preventing or minimizing the negative effects and maximizing the positive effects of KRN's current and proposed exploration activities (the *Kaoko Project*).

Once approved by the Directorate of Environmental Affairs (DEA), Ministry of Environment and Tourism (MET), in the form of an Environmental Clearance Certificate (ECC), the EMP will become a legally binding document and KRN, its Contractor(s), and their Sub-Contractor(s) are required to abide to the conditions stipulated in the EMP.

The EMP is presented as a comprehensive matrix: for each Activity/Process and related Aspects and Impacts, Management Actions required to address the impacts arising directly and indirectly from the various aspects of KRN's current and proposed exploration activities are listed.

Copies of the EMP should be made available at the Office of KRN during the exploration and rehabilitation phases of the *Kaoko Project*.

External auditing (and monitoring) should be carried out to ensure compliance with the EMP. Parties responsible for transgression of the EMP should be held responsible for any rehabilitation that needs to be undertaken.

Note that the EMP is not a static document and that the document should be updated as the Project progresses/more information re the proposed activities becomes available.

7.2 Permits and Approvals

The most pertinent legislation, with the aim of informing KRN of the legal requirements pertaining to the Project during the exploration and rehabilitation phases of the *Kaoko Project*, is listed under Section 4 of this Report.

A summary of the relevant legislation and regulatory authorities (including contact details) as far as permits and/or approvals are concerned, is provided:

Legislation	Regulatory Authority	Permit/Approval	Contact Details
Nature Conservation Ordinance No. 4 of 1975	Ministry of Environment and Tourism (MET)	A permit is required prior to the picking, cutting/chopping/picking off, taking, gathering, uprooting, damaging or destroying, or transporting any protected plant.	Mr Toivo Uahengo Directorate Scientific Services Tel. 061-2842506 tuahengo@met.na
Forest Act 12 of 2001 (as amended by the Forest Amendment Act 13 of 2005)	Ministry of Agriculture Water and Forestry, Directorate of Forestry	A permit is required prior to the removal of any protected tree species.	Mr Vincent G. Louw Deputy Director: Forest and Botanical Research Tel. 061-208 7327 LouwV@mawf.gov.na
National Heritage Act 27 of 2004	Ministry of Sport, Youth and National Service, Directorate National Heritage and Culture	Inform the National Heritage Council of Namibia should any archaeological material be found during the exploration phase	Rev Salomon April Director, National Heritage Council of Namibia Tel. 061-244375 salomon@nhc-nam.org

Legislation	Regulatory Authority	Permit/Approval	Contact Details
Environmental Management Act 7 of 2007	Ministry of Environment and Tourism (MET), Directorate of Environmental Affairs	Environmental Clearance Certificate.	Mr Teofilus Nghitila Environmental Commissioner Tel. 061-2842751 nghitila@met.na or tnghitila@yahoo.com
Labour Act 11 of 2007	Ministry of Labour, Industrial Relations and Employment Creation	Permission is needed to run 12-hour shifts (should it be required).	Mr Henri Kassen Labour Commissioner Tel. 061-379100 hkassen@mol.gov.na

7.3 Roles and Responsibilities

KRN is responsible for fulfilling the requirements in the EMP for the *Kaoko Project*.

In addition to the before-mentioned, the following actions are proposed:

1. The provision by KRN of, on an on-going basis, sufficient management sponsorship and human and financial resources for the implementation of the EMP;
2. The development of a monitoring programme(s) (as needed) (see Section 7.5); and
3. External auditing (by an independent, external auditor) of the management actions as contained in the EMP for the exploration and rehabilitation phases of KRN current and proposed exploration activities (the *Kaoko Project*).

7.4 Environmental Management Plan

This Section contains the Environmental Management Plan (EMP) for the exploration and rehabilitation phases (Table 10) of KRN's *Kaoko Project* (also see IFC, 2007a, b; Prospectors and Developers Association of Canada (PDAC), 2009).

Table 10: Environmental Management Plan for the exploration and rehabilitaion phases of Kunene Resources Namibia (Pty) Ltd's current and proposed exploration activities, *Kaoko Project*, Kunene and Omusati Regions, Namibia.

ASPECT	IMPACT	MITIGATION/COMPENSATION
***Kaoko Project* Exploration and Rehabilitation: Social and Environmental Performance**		
Management and Monitoring	Social and Environmental Performance	Adhere to all Namibian Legislation, including Best Practice Guidelines. Ensure that all aspects related to the Environmental Management Plan (EMP) are implemented during the exploration (and rehabilitation) phases.
Consultation and Disclosure	Social and Environmental Performance	Maintain open and direct lines of communication with the Authorities and Interested and Affected Parties (I&APs) (e.g. the Ministry of Environment and Tourism (MET), the Ministry of Mines and Energy (MME), the Traditional Authorities, and the Chairpersons/Managers of the Conservancies) with regards to environmental matters. Consult with I&APs throughout the project process and adequately incorporate I&APs' concerns.
Grievance Mechanism	Social and Environmental Performance	Implement a grievance mechanism for receiving and resolving any concerns and grievances related to the project's social and environmental performance throughout the project life cycle. Inform all I&APs about the mechanism. Address concerns promptly and transparently and in a culturally appropriate manner. Keep a register of all concerns/issues received from I&APs, as well as the measures taken to address these.
Training, including awareness and inductions	Social and Environmental Performance	Train employees and contractors in matters related to the project's social and environmental performance and Namibia's regulatory requirements. Ensure adequate environmental awareness training for all senior site personnel. Give environmental induction presentations to all site personnel prior to work commencement (note that rehabiliation issues need to be addressed, i.e. the need to avoid damage as far as possible and from the start).
Employment and procurement opportunities	Social and Environmental Performance	Include the EMP in the contract(s) with the contractors (e.g. drilling contractors)/service providers so that the latter can make provision for the implementation of the EMP. Penalties for non-compliance with the stipulations of the EMP should be agreed upon (and can be included in the contract documents). Source contracting companies/service

ASPECT	IMPACT	MITIGATION/COMPENSATION
		providers/ experts/workers based on merit and expertise giving preference to local contractors/service providers/experts/workers on condition that the local contractors/service providers/experts/workers have the required experience and expertise. Consider utilising local labour for unskilled work and to then provide training to workers in order to perform semi-skilled work; this should be done under the supervision of managers/specialists to ensure maximum local beneficiation. Ensure that contractors/service providers/experts adhere to the Namibian Labour, Social Security, Health and Safety, and Affirmative Action laws. Tender documents/contracts to stipulate that all contractors/service providers have an **HIV/AIDS Policy and Programme** in place. Source maximally from local resources to ensure maximum economic beneficiation of local businesses in terms of new business sales.
Labour and Working Conditions	Social and Environmental Performance	Establish, maintain and improve the worker-management relationship. Base the employment relationship on equal opportunity and fair treatment and no discrimination to be allowed. Comply with Namibia's labour and employment laws. Promote safe and healthy working conditions and the protection and promotion of worker health. Document and communicate the Working Conditions and Terms of Employment. Respect Collective Agreements and the right of workers to organize and bargain collectively. Implement a Grievance Mechanism.
Occupational Health and Safety and Security	Social and Environmental Performance	Adhere to all Namibia's Health and Safety Regulations (Labour Act, 1992: Regulations Relating to the Health and Safety of Employees at Work). Prepare and submit a **Health and Safety Plan**. A SHE (Safety, Health, Environment) Representative to be appointment once the staff complement reaches 20. Occupational Health and Safety Training to be provided to all employees. Ensure that qualified first aid can be

ASPECT	IMPACT	MITIGATION/COMPENSATION
		provided at all times. Comply with all safety regulations re. electricity supply. Ensure that employees are trained in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times. Provide and ensure the active use of Personal Protective Equipment (PPE) (e.g. protective glasses and dust masks in dusty working conditions, overalls, gloves, safety shoes and hard hats). Make suitable arrangements, as far as practicable, for the maintenance of health, the prevention and overcoming of outbreaks of disease and of adequate first aid services. Supply potable water for human consumption and other domestic uses; conduct chemical testing of water samples on a monthly basis (if applicable). A water supply borehole should not be within 30 m of a French drain, not within 30 m of fuel or waste oil storage areas, not within 100 m of a waste dumpsite and not within an active drilling area; conduct groundwater test pumping to ensure a perennial supply; water storage tanks/reservoirs to be insect and animal-proof and to be covered to reduce evaporation; ensure that pipelines laid from the borehole to the camp- and/or drill sites do not unduly disturb vegetation and/or soil; drinking-water quality to be in accordance with the Ministry of Agriculture, Water and Rural Development's *Guidelines for the evaluation of drinking-water quality for human consumption with regard to chemical, physical and bacteriological quality.* Prevent communicable disease (e.g. Sexually Transmitted Infections (STIs) such as HIV transmission): provide surveillance and active screening and treatment of employees; prevent illness among employees (through health awareness and education initiatives); ensure ready access to medical treatment, confidentiality and appropriate care, particularly with respect to migrant workers; and promote immunization. Ensure that security arrangements are in place.
Community Health and Safety	Social and Environmental Performance	Notice or information boards relating public health and safety hazards and emergency contact details should be put up at the entrances to the Exclusive Prospecting License (EPL)-areas/pits and trenches/drill site(s)/blasting sites.

ASPECT	IMPACT	MITIGATION/COMPENSATION
		Transport safety: all vehicles/trucks moving on the roads should not exceed 60 kilometres per hour (km/h). Enforce a strict ban on the recruitment of workers at the entrances to the EPL-areas and on visitors gaining entry to the workers on site. Restrict construction activities to demarcated areas; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land/properties.
***Kaoko Project* Exploration: General**		
Exploration Activities	Disturbance of fauna and flora and habitat alteration	Carry out a baseline ecological survey (of the vertebrate fauna and flora) prior to any trench sampling (and especially blasting), bulk sampling (and especially blasting), or drilling, being carried out in sensitive mountain habitats. Avoid important habitats (e.g. ephemeral rivers, rocky outcrop and mountainous areas, and clumps of protected tree species) in the selection of camp and other temporary lay over sites. Avoid the removal of any protected flora species as far as feasible. A permit is required prior to the picking, cutting/chopping/picking off, taking, gathering, uprooting, damaging or destroying, or transporting any protected tree and/or plant. No trees or natural vegetation may be removed for the making of fires. No fires will be allowed, unless a specific area has been set aside for the cooking of food. Ensure that the kitchen areas/areas where fires will be made are cleared of grass (to prevent accidental fires which could cause wildlife and domestic stock mortalities). Ensure the availability of firefighting equipment (e.g. fire beaters, spades, extinguishers, etc.) at the exploration/camp sites. Avoid introducing dogs and cats as pets to the camp sites (these can cause significant mortalities to local fauna (by cats) and even stock losses (by dogs)). Do not introduce non-indigenous/invasive alien plant species. Implement a policy of “no kill” with regards

ASPECT	IMPACT	MITIGATION/COMPENSATION
		to fauna (e.g. poaching for meat (snares); the collection of veld foods (e.g. tortoises); the capture/killing of birds; the killing of snakes, etc.). No wild animal may be injured, fed, trapped, hunted or harmed in any way. Should areas have to be cordoned off (e.g. pits, trenches and drill sites), alternative arrangements should be made to ensure that livestock can have access to grazing areas and water points at all times. Implement a suitable and appropriate refuse removal policy (littering could result in certain animals becoming accustomed to humans and the associated activity and result in typical problem animal scenarios). Avoid off-road and unnecessary nocturnal driving in the area (as it could result in the destruction of slow moving fauna, i.e. various reptiles and other nocturnal species). Implement and maintain (internal) track discipline with maximum speed limits (e.g. 30 km/h; in the villages and around animals, a speed limit of 20 km/h to be enforced) (this would result in fewer faunal road mortalities and associated dust pollution problems). Teach drivers to use three point turns (vs full circle turns), or restrict turning to designated areas. Make use of existing tracks/roads as much as possible; where tracks have to be made, the routes should be selected so as to cause minimal damage to the environment (e.g. cross drainage lines at the right angles, and avoid placing tracks within drainage lines). Restrict all activities to previously demarcated areas; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land. No trespassing on adjoining properties is allowed and no game/vegetation is to be interfered with.
Exploration Activities	Loss of or damage to archaeological material	All staff (i.e. personnel, contractors, subcontractors, etc.) to be made aware of the provisions of the National Heritage Act 27 of 2004 with regard to the protection of all archaeological sites and the need to report any new finds.

ASPECT	IMPACT	MITIGATION/COMPENSATION
		Consult with the Traditional Authorities and the Chairpersons of the communal conservancies re the location of e.g. grave(s) in the various EPL-areas. Carefully examine the area before any site preparation/excavation is undertaken. Implement the Chance Finds Procedure (see Annexure B): should a possible or suspected site be discovered (e.g. a grave), immediately stop work, cordon the area off and photograph the area/site; immediately inform the project manager/supervisor, and contact Dr Kinahan, the National Heritage Council of Namibia, and the Police in Opuwo. Under no circumstances are archaeological and/or cultural heritage sites to be disturbed or any relics to be removed from such a site.
Exploration Activities	Pollution of biophysical environment (air, soil and water)	No fires will be allowed, unless specific areas have been identified and set aside for the cooking of food. Cooking appliances are to be properly maintained and ventilated. Pit latrines to be provided and used at the exploration and camp sites(s). Sanitary wastewater to be released into a French drain system. Use bio-degradable detergents on site. Vehicle maintenance/servicing/washing not to be allowed anywhere on site. Fuel tanks (portable), gas cylinders and chemicals (if relevant) are to be properly stored and transported. All diesel generators on site to be placed on concrete slabs/a tarpaulin sail. Oil and grease traps or sumps to be installed and maintained. Immediately report and clean up any accidental hydrocarbon spill: Sunsorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site; ensure the availability of absorbent pads and/or spill kits and ensure that personnel are trained in their use. Enforce proper waste (hazardous and non-hazardous) management practices (as per **Waste Management Plan**) – waste and litter to be disposed of in scavenger and weatherproof bins and the refuse to be collected and disposed of at least once a

ASPECT	IMPACT	MITIGATION/COMPENSATION
		week.
Exploration Activities (Soil Sampling, Pits and Treches, and Drilling)	Clearing of vegetation for exploration activities / negative impact on floral species	Carry out a baseline ecological survey (of the vertebrate fauna and flora) prior to any trench sampling (and especially blasting), bulk sampling (and especially blasting), or drilling, being carried out in sensitive mountain habitats. Avoid the removal of and/or damage to any protected flora species as far as feasible. A permit is required prior to the picking, cutting/chopping/picking off, taking, gathering, uprooting, damaging or destroying, or transporting any protected tree and/or plant. Do not clear any vegetation more than six months in advance of when it is required. Bulldozer blading and clear cutting to be avoided (if possible) (excavators and backhoes do a neater job), also clearing with heavy machinery. Where possible, preserve the organic mat, i.e. drive over flattened vegetation (for rootstock preservation and the prevention of soil erosion). Leave large trees standing where possible. Reduce the visual impact of vegetation clearance as far as possible. E.g. weave roads around trees or relocate facilities to help reduce the visual impact of vegetation clearance. Avoid removing vegetation adjacent to rivers and streams. Leave a buffer zone of undisturbed vegetation at least 10 m wide on either side of the stream or waterway. Cutting vegetation: cut vegetation close to ground level; buck cut trees; trim overhanging vegetation; do not fell live saplings of any species over 150 mm in diameter unless absolutely necessary. Line Cutting and Surveys: use hand tools to cut lines; survey lines or walking tracks to not exceed 1 m in width; only use biodegradable and then also only small lengths of tape.
Exploration Activities (Pits and Trenches)	Land disturbance / negative impact on floral species	Locate trenches and pits to avoid large trees (>150 mm in diameter) (where feasible), or pre-cut trees and move them to one side for salvage. For large trenches that will be left open for weeks or months, strip the topsoil and move it to one side of the trench into long, narrow piles, no more than 1-2 m in height; ensure proper drainage through the topsoil piles. Place the subsoil plus any excavated rock in separate piles (i.e. not on top of the topsoil).

ASPECT	IMPACT	MITIGATION/COMPENSATION
		Use excavators and backhoes to dig trenches (vs bulldozers). When refilling the trench, replace the rock and subsoil first, and then the topsoil/vegetation layers. If topsoil is stored for more than three months, fertilizing may be needed and if it is stored for more than six months, seeding may be beneficial.
Exploration Activities (Drilling, including rigs, vehicles, generators)	Pollution of biophysical environment (soil and groundwater)	Use biodegradable and non-toxic drill fluids/additives. All diesel generators on site to be placed on a tarpaulin sail. Oil traps to be installed in appropriate places to collect potential toxic materials. Immediately report and clean up any accidental hydrocarbon spill: Sunsorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site. Ensure the availability of absorbent pads and/or spill kits and ensure that personnel are trained in their use. (Backfill or) seal all drill holes with a steel or uPVC casing equipped with a secure cap (to prevent groundwater contamination from taking place through the drill holes). Drill cuttings not to be used for backfilling; use clean sand or clay where possible. Drill holes not to be used as pit latrines and/or for the disposal of waste.
Exploration Activities	Possible loss of the seed bank in the topsoil	Any decaying vegetation, overlying the soil layer, should be removed first and stockpiled. The upper layer of soil (10 - 20 cm), where alluvial, to be stripped and stockpiled separately (1 – 2 m high piles to allow for proper aeration). Install drainage to protect the topsoil pile from (water) erosion and cover it to protect it from (wind) erosion. Any excavated subsoil and rock also to be stockpiled for backfilling.
Exploration Activities (airborne geophysical survey)	Noise pollution (disturbance of fauna, landowners and residents)	Inform and discuss flight plans with the Traditional Authorities. Avoid flying over residences and game/livestock enclosures (if feasible). No wildlife to be chased, diverted, followed, or otherwise harassed by aircraft.
Exploration Activities	Soil erosion	Sediment mobilization and transport: reduce or prevent soil erosion (schedule activities to avoid heavy rainfall periods;

ASPECT	IMPACT	MITIGATION/COMPENSATION
		contour and minimize length and steepness of slopes; mulching to stabilize exposed areas; re-vegetate areas promptly (if feasible); and design channels and ditches for post-construction flow). Note that the area(s) towards and adjacent to the drainage line(s) are easily eroded and further development may exacerbate this problem. Road design: limit access road gradients to reduce run-off induced erosion; provide adequate road drainage based on road width, surface material, compaction and maintenance. Structural (slope) stability: provide effective short-term measures for slope stabilization, sediment and subsidence control until long-term measures (during operations) can be implemented; provide adequate drainage systems to minimize and control infiltration.
Increased traffic, presence and movement of machinery	Air quality (dust or Particulate Matter (PM) pollution)	Minimize dust generation from vehicles on the roads; all vehicles, trucks moving in the area should not exceed 30 km/h; in the villages and around animals, a speed limit of 20 km/h to be enforced. Minimize the area in which the movement of vehicles will take place to reduce the effects of dust pollution. Avoid the excavation, handling and transport of erodible materials under high wind conditions or when a visible dust plume is present. Maintain the road surface to preserve surface characteristics (e.g. texture and roughness). Use dust control/suppression methods (if needed), such as applying water or non-toxic chemicals to minimize dust (oil and oil by-products is not a recommended measure to control road dust).
Increased traffic, presence and movement of machinery (exhaust from diesel engines)	Air quality & Occupational and Community Health and Safety	Implement manufacturer recommended engine maintenance programmes (to control vehicle emissions: Carbon Monoxide (CO), Nitrogen Oxide (NO_x), Sulphur Dioxide (SO_2), Particulate Matter (PM) and Volatile Organic Compounds (VOCs)).
Increased traffic, movement of machinery	Occupational and Community Safety	Adopt best transport safety practices by implementing the following measures: emphasize safety aspects among drivers; improve driving skills and require licensing of drivers; adopt limits for trip duration; avoid dangerous routes and times of day; and use speed control devices. Regularly maintain vehicles and use manufacturer approved parts. Use locally sourced materials (where possible) to minimize transport distances.

ASPECT	IMPACT	MITIGATION/COMPENSATION
		Employ safe traffic control measures, including the use of traffic and safety warning signs and flag persons to warn of dangerous conditions.
Use of Explosives for Blasting	Occupational Health and Safety	Ensure that the use, handling, and transporting of explosives is in accordance with the Regulations of the Explosives Act 26 of 1956.
***Kaoko Project* Exploration: Change in Land Use**		
Exploration Activities	Change in land use	Restrict all exploration and related activities to demarcated areas; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land. Should areas have to be cordoned off (e.g. pits, trenches and drill sites), alternative arrangements should be made to ensure that livestock can have access to grazing areas and water points at all times.
***Kaoko Project* Exploration: Resource Use**		
Energy Management	Resource use (e.g. coal) / depletion of natural resources	Promote the sustainable use of energy (that will result in the reduction of use and cost reductions) (e.g. energy efficient light sources). Raise awareness amongst the staff and contractors/service providers (to save energy).
Water Management	Resource use / depletion of natural resources	Ensure prudent use of water in all activities. Implement a water conservation program, promoting the continuous reduction in water consumption; treatment and disposal costs commensurate with the magnitude and cost of water use. Water storage tanks to be insect and animal-proof and to be covered to reduce evaporation.
***Kaoko Project* Exploration: Hazardous Materials Management**		
Hazardous materials management	Social and Environmental Performance	Establish hazardous materials management priorities (based on hazard analysis of risky operations). Avoid, or minimize the use of hazardous materials. Prevent uncontrolled releases of hazardous materials to the environment or uncontrolled reactions that may result in fire or explosion.
Hazardous materials management	Pollution of biophysical environment (soil and water)	Implement prevention and control measures for the use, handling and storage of hazardous materials: Materials transfer: regularly inspect, maintain and repair fittings/pipes/hoses; make use of drip trays/other drip containment measures at connection/possible overflow points; Overfill protection: use trained filling operators; install gauges on tanks to measure the volume inside; make use of dripless hose connections (vehicle tanks)

ASPECT	IMPACT	MITIGATION/COMPENSATION
		and fixed connections (storage tanks); use a catch basin/drip tray around the fill pipe to collect spills; Reaction, fire, and explosion prevention: hazardous materials to be stored in marked containers and separate (from non-hazardous materials); incompatible hazardous materials (acids, bases, flammables, oxidizers, reactive chemicals) to be stored in separate areas and with containment facilities separating material storage; smoking or working with open flames not to be permitted in the presence of these substances; limit access to hazardous waste storage areas and clearly label and demarcate the area; conduct regular inspections of the areas and document the findings; prepare and implement spill response and emergency plans; train employees in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times. Secondary containment: use bunding (made of impervious, chemically resistant material) that can contain the larger of 110% of the largest tank or 25% of the combined tank volumes for above-ground tanks with a total storage volume equal or greater than 1,000 litres. Train workers on the correct transfer and handling of fuels and chemicals and the response to spills. Immediately report and clean up any accidental hydrocarbon spill: Sunsorb, Drizit, Peatsorb can be used to clean up small spills; in case of larger spills, the spill together with the polluted soil should be removed and disposed of at e.g. a biological remediation site.
Hazardous materials management	Occupational Health and Safety	Implement hazard communication and training programmes (including information on Material Safety Data Sheets (MSDS)) to make employees aware of workplace chemical hazards and how to respond to these. Provide and ensure the active use of PPE.
***Kaoko Project* Exploration: Waste Management**		
Waste management: non-hazardous and hazardous	Pollution of biophysical environment	Prepare and submit a **Waste Management Plan** before the activities commence. The generation of waste should be avoided or minimized as far as practicable; where it cannot be avoided, but has been minimized, waste should be recovered and reused; where waste cannot be recovered/reused, it should be treated, destroyed and disposed of in an environmentally sound manner. Institute and maintain good housekeeping and operating practices; littering is not allowed. Runoff from areas where surface water

ASPECT	IMPACT	MITIGATION/COMPENSATION
		might have become contaminated should be captured and treated to sewage effluent standards; uncontaminated runoff should be diverted around areas where such water might become contaminated. Non-hazardous and hazardous waste to be collected and stored separately. Non-hazardous waste: refuse (that will not be recycled) to be stored in covered refuse bins, collected on a regular basis and disposed of at a waste disposal facility (e.g. Opuwo). Non-hazardous, recyclable waste: refuse to be stored in covered bins/bags, collected on a regular basis and disposed of at the waste disposal facility in Windhoek. Hazardous waste: recycle petroleum (fuels and lubricants) waste products and collect and recycle batteries and print cartridges (if relevant). The remainder to be transported to a recognized hazardous waste disposal site (e.g. Windhoek).
Waste management: sanitary	Pollution of biophysical environment	Pit latrines to be provided and used at the exploration and camp sites(s). Sanitary wastewater to be released into a French drain system. Ensure that the discharge of sanitary wastewater to land conform to the regulatory requirements.
Wastewater management - wastewater treatment	Pollution of biophysical environment	Ensure that the discharge of process wastewater and/or sanitary wastewater and/or wastewater from utility operations and/or stormwater to land conform to the regulatory requirements (if relevant). Runoff from areas where surface water might have become contaminated should be captured and treated to sewage effluent standards; uncontaminated runoff should be diverted around areas where such water might become contaminated.
Wastewater management - stormwater management	Soil erosion	Regular inspection and maintenance of permanent erosion and runoff control features.
***Kaoko Project*: Rehabilitation & Decommissioning**		
Rehabilitation	Social and Environmental Performance	Rehabilitation to take place on a continuous basis. Drill dust to be raked into already disturbed areas (e.g. tracks), or the dust to be removed to a dump site. If water is struck while drilling, a sump must be built to capture the mud; the water must be left to evaporate; salt crusts must then be covered with gravel and topsoil / removed. Disturbed areas to be backfilled with rocks and subsoil, and then the topsoil/vegetation

ASPECT	IMPACT	MITIGATION/COMPENSATION
		layers. If topsoil is stored for more than three months, fertilizing may be needed and if it is stored for more than six months, seeding may be beneficial. Manually rip (using picks or rakes) disturbed areas where compaction has taken place; avoid creating parallel furrows (this will promote erosion). Reshape all disturbed areas to their original contours / manually rip disturbed areas, where compaction has taken place. Manually remove all weedy / invasive alien species that are present at the site. Adequately drain pipelines and tanks prior to decommissioning (to avoid pollution of the biophysical environment (soil and groundwater)).
Decommissioning	Social and Environmental Performance	Clean out the oil traps, seal all petrol, diesel, oil and grease containers and remove these from the site(s) to a recognized hazardous waste facility (in Windhoek). Remove all equipment, waste, temporary structures, etc. from the site(s). Pending the approval by the relevant people, the Company may donate infrastructure, etc. to the Community or Organizations aimed at uplifting the standards of the local Communities. Inform the Ministry of Environment and Tourism to assess the rehabilitation effort for approval and signoff.

COPY

EPEMBE MINING (PTY) LTD

A MEMBER OF

NAMIBIA CRITICAL METALS INC.

29 October 2018

The Permanent Secretary
Ministry of Environment and Tourism
Private Bag 13306, Windhoek
REPUBLIC OF NAMIBIA

For Attention: Mr. Theofilus Nghitila – Environmental Commissioner

Dear Sir,

Environmental Reporting for the period January 2018 – June 2018 for the company EPLs

Two Prospecting Licences (EPL3299 & MDRL3299) are held by Epembe Mining (Pty) Ltd (Epembe), and Epembe hereby submits its Bi-annual Environmental Report for the period January to June 2018.

During this time period, Epembe did not undertake any invasive exploration activities within EPL . The Table below lists the licences granted to Epembe and provides a status update regarding exploration progress and relevant environmental matters to report.

The company received the Environmental Clearance Certificate for further prospecting on the EPL, in June 2016, from the MET. All the company prospecting activities on the EPL are being conducted in an environmentally and socially sensitive way in accordance with the Environmental Management Plan.

Yours sincerely,

Philip Hooks
Environmental Consultant
philip.nigel.hooks@gmail.com
+264 81 127 9936 (mobile) / +44 7340 238 047 (WhatsApp)

EPEMBE MINING (PTY) LTD

A MEMBER OF

NAMIBIA CRITICAL METALS INC.

15 January 2019

The Permanent Secretary
Ministry of Environment and Tourism
Private Bag 13306, Windhoek
REPUBLIC OF NAMIBIA

For Attention: Mr. Theofilus Nghitila – Environmental Commissioner

Dear Sir,

Environmental Reporting for the period July 2018 – December 2018 for the company EPLs

Two Prospecting Licences (EPL3299 & MDRL3299) are held by Epembe Mining (Pty) Ltd (Epembe), and Epembe hereby submits its Bi-annual Environmental Report for the period July to December 2018.

During this time period, Epembe Mining did not undertake any invasive exploration activities within EPL. The Table below lists the licenses granted to Epembe and provides a status update regarding exploration progress and relevant environmental matters to report.

The company received the Environmental Clearance Certificate for further prospecting on the EPL, in June 2016, from the MET. All the company prospecting activities on the EPL are being conducted in an environmentally and socially sensitive way in accordance with the Environmental Management Plan (EMP).

Yours sincerely,

Philip Hooks
Environmental Consultant
philip.nigel.hooks@gmail.com
+264 81 127 9936 (mobile) / +44 7340 238 047 (WhatsApp)

ENVIRONMENTAL REPORT (ER)
(Prospecting Companies)
MDRL 3299

INSTRUCTIONS:

1. An Environmental Report shall be submitted to the Ministry of Environment and Tourism (MET) biannually. Jan to Jun and Jun to December: Please indicate:

January to June 2019

2. This form shall be the minimum reporting format. Prospecting Companies are expected to attach a map of their prospecting area to this report. Prospecting Companies are welcome to attach any other information they like, such as copies of new agreements, letters of explanation, aerial photographs, or anything else of interest.

3. The map shall be used to indicate the following:

* Areas where prospecting has taken place,
* Roads or tracks made and/or used,
* Houses and other infrastructure erected,
* Excavations or other scars which have been rehabilitated,
* Conflict areas, etc….

4. It is recommended (but not compulsory) that Prospecting Companies attach photographs to their report which visually illustrate the activities described in their report.

5. Failure to submit an Environmental Report shall constitute a breach of the Environmental Contract, which could result in steps taken against the Prospecting Company.

6. All information contained in the Environmental Report shall be treated as Confidential.

7. The Prospecting Company shall ensure that all the information recorded in the Environmental Report is, to their best knowledge, accurate and correct.

Completed Environmental Reports should be sent to:

The Permanent Secretary
Ministry of Environment and Tourism
Private Bag 13306
Windhoek

For Attention: Mr. Theofilus Nghitila – Environmental Commissioner

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For Attention: Mr. Theofilus Nghitila – Environmental Commissioner

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
DIRECTORATE OF ENVIRONMENTAL AFFAIRS
15 JAN 2021
RECEIVED
Signature:

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(Prospecting Companies)
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