



ENVIRONMENTAL
COMPLIANCE CONSULTANCY

ECC-46-87-REP-01-A



NATIONAL ENVIRONMENTAL STRATEGY & ACTION PLAN

NAMIBIAN MINING INDUSTRY

2017 – 2019

Prepared for:



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Additional report information

Development of an Environmental Strategy and Action Plan for the 2017 -2019 Chamber of Mines of Namibia Strategic Plan

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if we are
to take
then we
must
give back!



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DEFINITIONS AND ABBREVIATIONS

CoM	Chamber of Mines
CoMEC	Chamber of Mines Environmental Committee
CSR	Corporate social Responsibility
DEA	Directorate of Environmental Affairs
ECC	Environmental Compliance Consultancy
EMA	Environmental Management Act
EMP	Environmental Management Plan
GRN	Government
I&AP	Interested and affected parties
LTIFR	Lost time injury frequency rate
MAWF	Ministry of Agriculture Water and Forestry
MD	Managing Director
MET	Ministry of Environment and Tourism
ML	Mining Licence
MME	Ministry of Mines and Energy
NCE	Namibian Chamber of Environment
NGO	Non-Government Organisation
ToR	Terms of Reference



1. WELCOME

1.1. MESSAGE FROM THE COORDINATOR – MR CHARLES LOOTS

Our mining businesses do not operate in an isolated environment. Levels of scrutiny towards environmental and social performance are increasing, the strength of the community voice is growing, and higher standards of governance and accountability (e.g. King IV) are influencing and guiding the way companies do business. Understanding and meeting environmental and community expectations is a pre-requisite for mining operations in Namibia.

As resolved at the Chamber of Mines' Council Bosberaad in September 2016, a comprehensive Environmental Strategy and Action Plan should be developed and implemented as part of the Chamber's 2017-2019 Strategic Plan. In response, this plan (covering the period 2017-2019) was developed by a collective group of environmental professionals within the mining and minerals industry. The plan has been compiled from information gathered during a two-day workshop held on 28th – 30th June 2017 at Otjikoto Trust Environmental and Education Centre.

The purpose of the workshop was to share information on the environmental work being carried out at each mine, discuss successes and challenges, identify key environmental issues to be addressed in the plan, identify main actions needed to implement the environmental components of the plan, and to consider an independent and external environmental assessment awards programme for the Namibian mining industry.

The workshop coordinated by the Namibian Chamber of Environment and the Chamber of Mines was a great success with members from across the country attending and actively participating in the development of this plan. The consolidated plan outlined in this document will focus the industry's attention on key environmental and social performance areas for mining and mineral operations in Namibia.

The actions derived from the Strategic Environmental Plan have set a demanding programme for the period ahead. We are confident that with your support we can achieve our objectives and improve industry's environmental and social performance.

We look forward to implementing the plan and welcome your feedback at any time throughout the life of the plan.

Yours sincerely

Mr. Charles Loots
B2Gold General Manager



CHAMBER OF MINES ENVIRONMENTAL COMMITTEE (CoMEC)



2. STRATEGY AND VISION

This Environmental Strategy and Action Plan (ESAP) is a three-year strategic plan that forms part of the Chamber of Mines' strategic plan, and outlines the vision, mission and strategic framework for the Namibian mining and minerals industry.

The Strategic Environmental Plan 2017-2019 (this plan) was developed by a collective group of environmental professionals within the mining and minerals industry, working with the Namibian Chamber of Environment (NCE). This plan will be reviewed annually to reflect our progress towards our goals.

2.1. VISION AND MISSION

The Namibian Chamber of Mines' (CoM) vision for the mining industry, reflecting the consensus of all members of the CoM, is as follows.

"Our vision for the Namibian Mining Industry is to be widely respected as a safe, environmentally responsible, globally competitive and meaningful contributor to the long-term prosperity of Namibia".

Chamber of Mines Mining Industry Vision

The future of the Namibian minerals industry is directly linked to the global mineral producer's commitment to sustainable development. The Brundtland Commission's definition of sustainable development is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". In the mining and minerals sector, this translates to investments in minerals projects that should be **financially profitable, technically appropriate, environmentally sound and socially responsible**.

Industry's mission as stated by the CoM is **"to effectively promote, encourage, protect, foster and contribute to the growth of responsible exploration and mining in Namibia to the benefit of the country and all stakeholders"**.

To achieve continual improvement and successful implementation of the National Environmental Strategic Plan for the minerals and extractive industry, the CoM and the NCE have developed this framework in collaboration with representatives from the environment departments of exploration and mining companies operating in Namibia.



2.2. METHODOLOGY

The ESAP was compiled based on information gathered during a two-day workshop held in June 2017. Each mining company gave a presentation on their work, challenges, successes and what they considered to be the key strategic issues for the industry. Arising from the information provided and a series of facilitated working group sessions, eight priority focus areas were identified that form the foundation of this plan.

The ESAP is thus based on eight pillars that outline what we want to achieve and incorporates a number of strategic priorities to each of the eight focus areas (see diagram below). These are supported by the necessary actions considered necessary to achieve the strategic priorities. The specific actions have been allocated to key personnel to coordinate, manage and implement.

OUR EIGHT FOCUS AREAS





3. ENVIRONMENTAL STRATEGY & ACTION PLAN

THESE ARE OUR PRIORITIES...	> THIS IS HOW WE PLAN TO ACHIEVE THEM	> THIS IS HOW YOU CAN MEASURE OUR SUCCESS	LET US INTRODUCE OUR AMBASSADORS WHO WILL DRIVE OUR SUCCESS	OUR AMBASSADOR WILL COMPLETE THIS BY
ESTABLISH AN INSTITUTIONAL BODY WITHIN THE CHAMBER OF MINES FOCUSED ON ENVIRONMENTALLY RESPONSIBLE MINING IN NAMIBIA.	Establish the CoM Environmental Committee (CoMEC).	<ul style="list-style-type: none"> CoMEC charter and TOR signed by mining members and member appointed. 	Mr Veston Malango	Quarter 4 2017
	CoMEC will develop and implement a Terms of Reference (TOR) that addresses objectives, goals, functionality, frequency of meetings, members and key roles of the committee i.e. committee chairperson. CoMEC to meet biannual in year one and annually thereafter.	<ul style="list-style-type: none"> TOR approved by CoM TOR implemented and CoMEC operating in accordance with TOR Biannual and annual meetings held by the CoMEC 	Mr Charles Loots	Quarter 4 2017
	CoMEC to prepare a pragmatic programme of work to implement this plan	<ul style="list-style-type: none"> CoMEC to recommend reporting indicators for MDs to integrated environmental indicators into the CoM Council reporting (for example safety indicators (LTIFR) as reported currently) 	Mr Charles Loots	Quarter 4 2017
CoMEC WILL ESTABLISH AND MAINTAIN RELATIONS WITH GOVERNMENT TO KEEP ABREAST OF CURRENT AND FORMATIVE LEGAL AND POLICY ISSUES	Actively participate in reviews of relevant laws, policies, standards and guidelines that facilitate the mining and minerals sectors contribution to sustainable development within the national sustainable development strategies	<ul style="list-style-type: none"> CoM, NCE and CoMEC members to flag any draft or new policies, legislation, guidelines and standards, so that these can be reviewed by the sector in the context of sustainable development in the mining sector, to provide technical expert opinion 	Mr Veston Malango, Dr Chris Brown, CoMEC	Quarter 4 2017
	Make recommendations to government to improve, consolidate and streamline laws, policies, standards and guidelines where possible	<ul style="list-style-type: none"> CoM and NCE in consultation with CoMEC to commission a legal, policy and guideline gap analysis, including areas of mismatch between the concept of sustainable development in the mining sector and existing policy and legislation (for example Namibia does not have an air quality standard and industry currently defers to the South African legislation) 	Mr Veston Malango, CoMEC, Dr Chris Brown	Quarter 2 2018
	Establish relationships with government to provide information to and from industry on policy or sector opinion	<ul style="list-style-type: none"> CoMEC to invite and encourage representation and engagement of GRN at meetings and in other appropriate ways 	Mr Veston Malango & Mr Charles Loots	Quarter 1 2018
	Support the development of scientifically sound policies, regulations, product standards and decisions that encourage responsible mining	<ul style="list-style-type: none"> CoMEC to explore and implement appropriate ways to share scientific data and research obtained from mining operations to aid in developing sound regulations and policies. 	Charles Loots & CoMEC, with support from Mr Veston Malango & Chris Brown	Quarter 3 2018
STRENGTHEN WORKING RELATIONSHIP WITH THE OFFICE OF THE ENVIRONMENTAL COMMISSIONER, DEPARTMENT OF ENVIRONMENTAL AFFAIRS	Assist GRN to build capacity and ensure staff in the Office better understand the mining sector and its requirements	<ul style="list-style-type: none"> Invite GRN officials to the CoMEC meetings 	Mr Veston Malango	Quarter 2 2018
	Prepare a standardised reporting framework for Environmental Management Plan reporting for the mining sector for approval by the Office of the Environmental Commissioner, to address current inconsistencies from the regulator	<ul style="list-style-type: none"> In conjunction with MET develop a standardised reporting framework for industry In conjunction with MET and CoMEC develop guidelines for review by the regulator to promote consistency 	Mr Charles Loots & CoMEC	Quarter 4 2018



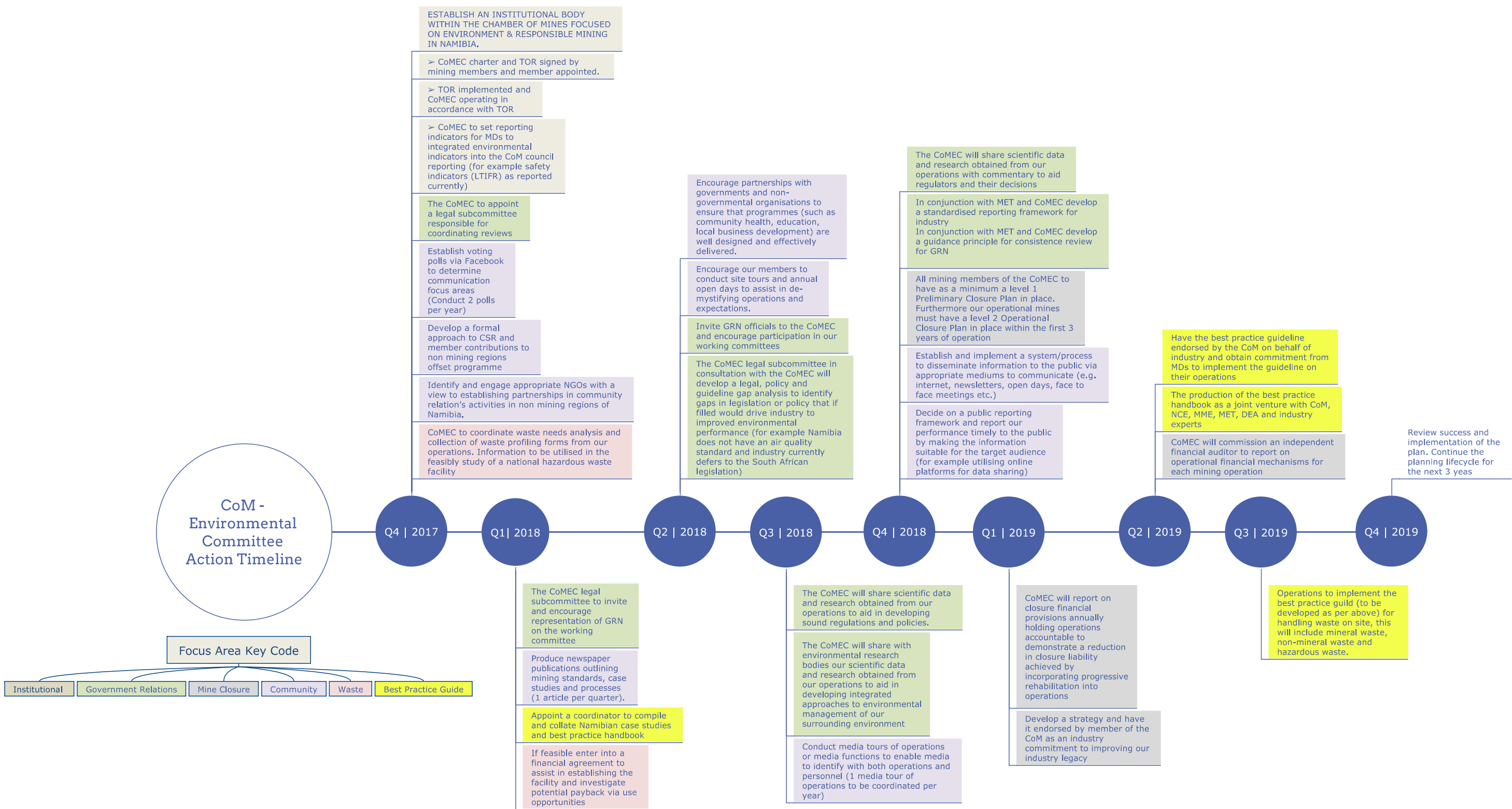
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AND OTHER RELEVANT MINISTRIES & INSTITUTIONS.	Provide regulators and other stakeholders with scientifically sound data and analysis regarding our products and operations as a basis for regulatory decisions. <small>ISEP</small>	<ul style="list-style-type: none"> CoMEC will share scientific data and research obtained from our exploration and mining operations with commentary to aid regulators and their decisions 	Mr Veston Malango & CoMEC	Quarter 4 2018
INTEGRATE MINE CLOSURE, CARE & MAINTENANCE, REHABILITATION AND FINANCING THEREOF, INTO ALL PHASES OF THE MINE LIFE	CoMEC to drive implementation of the CoM Namibian Mine Closure framework to hold our industry accountable for progress	<ul style="list-style-type: none"> All mining members of CoMEC to have as a minimum a level 1 Preliminary Closure Plan in place. Furthermore, our operational mines must have a level 2, Operational Closure Plan in place within the first 3 years of operation 	Mr Veston Malango & CoMEC	Quarter 4 2018
	CoMEC to drive concurrent/operational rehabilitation by integrating this approach into operational schedules and plans to reduce closure risks and obligations returning revenue opportunities to the operations	<ul style="list-style-type: none"> CoMEC will report on closure financial provisions annually holding operations accountable to demonstrate a reduction in closure liability achieved by incorporating progressive rehabilitation into operations 	Mr Veston Malango & CoMEC	Quarter 1 2019
	Establish a standardised and transparent approach for operations to report on closure financials mechanisms (for example trust accounts, independent fund) not just a balance sheet showing provisions.	<ul style="list-style-type: none"> CoMEC will commission an independent financial auditor to report on operational financial mechanisms for each mining operation 	Mr Veston Malango	Quarter 2 2019
	Engage industry, GRN, MME and NUST to develop improvement plans and strategies for abandoned mines and commence remediation planning based on risk profile	<ul style="list-style-type: none"> Develop a strategy and have it endorsed by member of the CoM as an industry commitment to improving our industry legacy 	Mr Veston Malango	Quarter 1 2019
WORK TOWARDS IMPROVING PUBLIC PERCEPTIONS OF MINING AND ENVIRONMENTAL PERFORMANCE	Better understand and address the perceptions, expectations, aspirations and needs of the public wrt the mining sector	<ul style="list-style-type: none"> Establish voting polls via Facebook to determine communication focus areas (Conduct 2 polls per year) 	CoMEC	Quarter 4 2017
	Increase awareness of environmental performance across community from the local to the national level	<ul style="list-style-type: none"> Produce newspaper articles and radio programmes and video clips outlining mining standards, case studies and processes (on average media piece per quarter). 	CoMEC	Quarter 1 2018
	Lead the way in engaging with stakeholders to fully understand concerns, and respond with sensitivity to build trust in and acceptance of a responsible mining industry	<ul style="list-style-type: none"> Establish and implement a system/process to disseminate information to the public via appropriate mediums to communicate (focus on social media, open days at mines, public talks) 	Mr Veston Malango, Mr Charles Loots & CoMEC	Quarter 4 2018
	Cultivate relationships of mutual benefit with media stakeholders to encourage informed commentary. Implement a media relations programme incorporating a proactive publicity strategy that includes promotion of positive stories.	<ul style="list-style-type: none"> Conduct media tours of operations or media functions to enable media to identify with both operations and personnel (1 media tour of operations to be coordinated per year) 	CoMEC	Quarter 3 2018
	Report on our environmental and social performance and our contribution to sustainable development.	<ul style="list-style-type: none"> Decide on a public reporting framework and report our performance timely to the public by making the information suitable for the target audience (for example utilising online platforms for data sharing) 	Mr Charles Loots Mr Veston Malango & CoMEC	Quarter 4 2018



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DEVELOP A BEST PRACTICE ENVIRONMENTAL GUIDE FOR THE MINING SECTOR		Develop a national handbook to guide our members in best environmental practice for the mining and minerals industry		– The production of the best practice handbook as a joint venture with CoM, NCE, MME, MET, DEA and industry experts	Dr Chris Brown, Mr Charles Loots & Mr Veston Malango & CoMEC	Quarter 1 2019
		Incorporate Namibian specific case studies into the best practice guide		– Appoint a coordinator to compile and collate Namibian case studies and best practice handbook, involving CoMEC for guidance and case studies	Mr Charles Loots, Dr Chris Brown Mr. Veston Malango & CoMEC	Quarter 1 2018
		Develop and implement national principles and practices for responsible mining that management is committed to enforcing		– Have the best practice guideline endorsed by the CoM on behalf of industry and obtain commitment from MDs to implement the guideline on their operations	Mr Veston Malango	Quarter 1 2019
IMPLEMENTATION OF THE CoM OFFSET AND INVESTMENT IN NON-MINING REGIONS (CSR)		CoMEC to drive the implementation of the CoM community offset and investment in non-mining regions programme.		– Develop a formal and coordinated approach to CSR and member contributions to non-mining regions offset programme	Dr Chris Brown & Mr Veston Malango	Quarter 4 2017
		CoMEC to take a proactive social role through listening to internal and external stakeholders, focusing on creating partnerships and aligning community and business values.		– Identify good projects that address both environmental and socio-economic development priorities, in line with national development goals (Harambee, NDP5, Vision 2030), targeting disadvantaged communities non-mining regions of Namibia.	Dr Chris Brown	Quarter 4 2017
				– Encourage involvement and collaboration with government and non-governmental organisations, and community groups; and promote match funding, particularly by beneficiaries to ensure that projects are well positioned to deliver successful results.	Dr Chris Brown	Quarter 1 2018
EXPLORE OPPORTUNITIES TO IMPROVE NON-MINERAL WASTE AND HAZARDOUS WASTE MANAGEMENT GENERATED BY OUR INDUSTRY		Provide for safe storage and disposal of residual wastes from our operations		– Operations to implement the best practice guide (to be developed as per above) for handling waste on site, this will include mineral waste, non-mineral waste and hazardous waste.	CoMEC	Quarter 4 2019
		Coordinate a needs analysis across our operations to define the requirements of a national waste facility		– CoMEC to coordinate waste needs analysis and collection of waste profiling forms from our operations. Information to be utilised in the feasibility study of a national hazardous waste facility	Mr Veston Malango	Quarter 4 2017
		Encourage and support the development of a national waste facility to receive mining waste generated by our operations (e.g. hazardous waste to be disposed of in a purpose-built facility that ensures protection of our environment)		– If feasible enter into a financial agreement to assist in establishing the facility and investigate potential payback via use opportunities	Mr Veston Malango	Quarter 1 2018



4. IMPLEMENTATION TIMELINE



5. ENSURING WE ARE ACCOUNTABLE

We want to measure our success, we want to know when we are doing well and we want to know when and where we can improve. Importantly we want to establish a reporting framework that holds us accountable for our environmental and social performance. CoMEC together with the Namibian Eco Awards programme plan to implement a mining award system that is independent, transparent and holds our operators accountable for their performance.

**The Chamber of Mines Environmental Committee would like to introduce you to
The ‘Responsible Mining Awards’ program.**

The Responsible Mining awards programme will be a prestigious hallmark that all mining operators will use to demonstrate their success. Based on a five-star rating, each operation will be independently audited against specific criteria formulated on the performance standards of the International Finance Corporation (IFC) for responsible mining. We won’t stop there, we will use the award system to benchmark operations against their peers, and use this transparent approach to engage and educate the public.

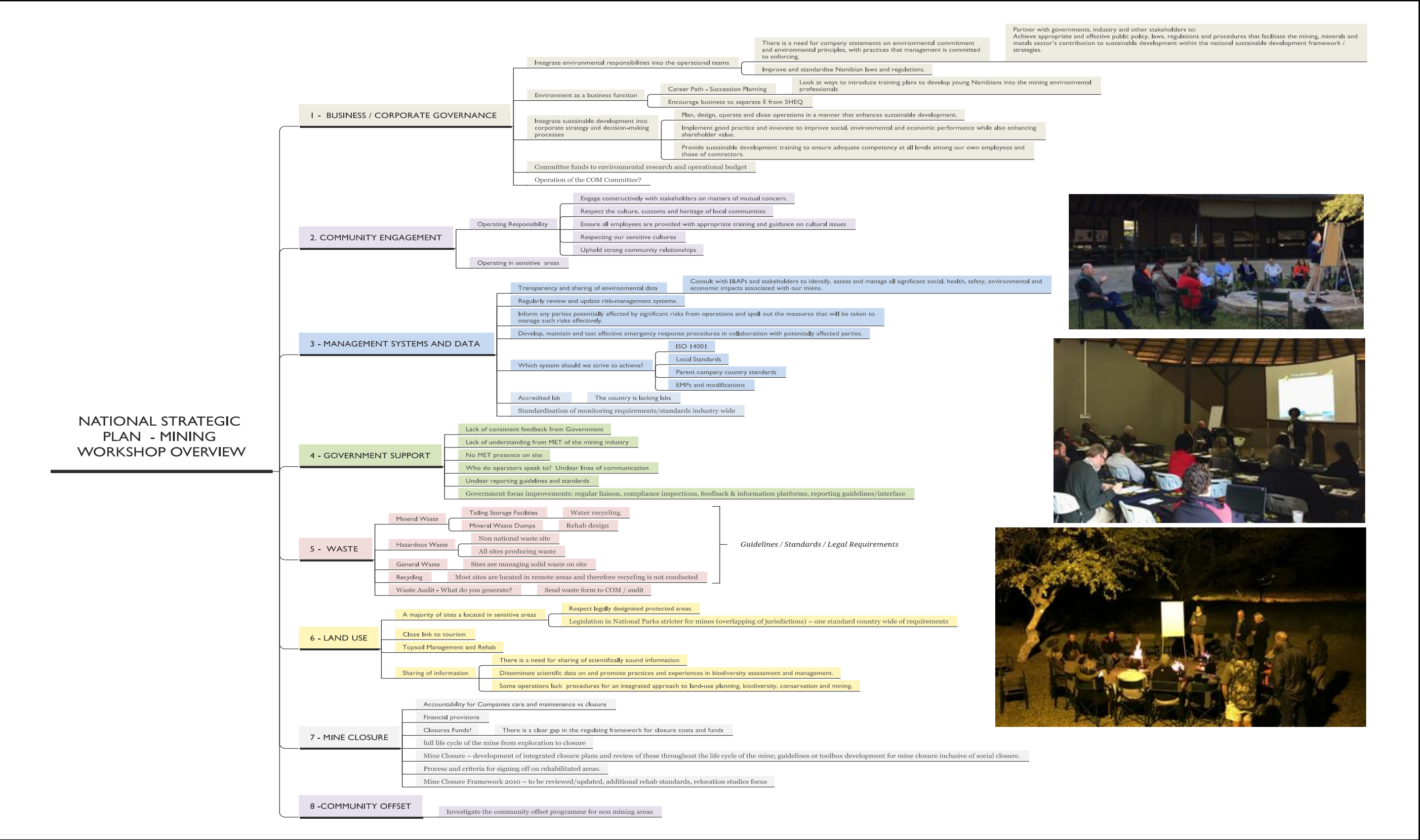
The areas for assessment will align with our strategic plan and will link to the relevant IFC performance standard. An annual independent audit will be conducted by the ‘Eco Awards’ organization. We will strengthen the Eco Awards organization by providing training and mining expertise to the audit team, provide toolkits for assessment and as a mining environmental committee, review findings from the field audit that will result in the issue of the operations ‘Responsible Mining’ award. CoMEC fully supports this initiative and is seeking the commitment from the CoM Council to develop and implement the ‘Responsible Mining’ awards system.

IFC E&S Performance Standards



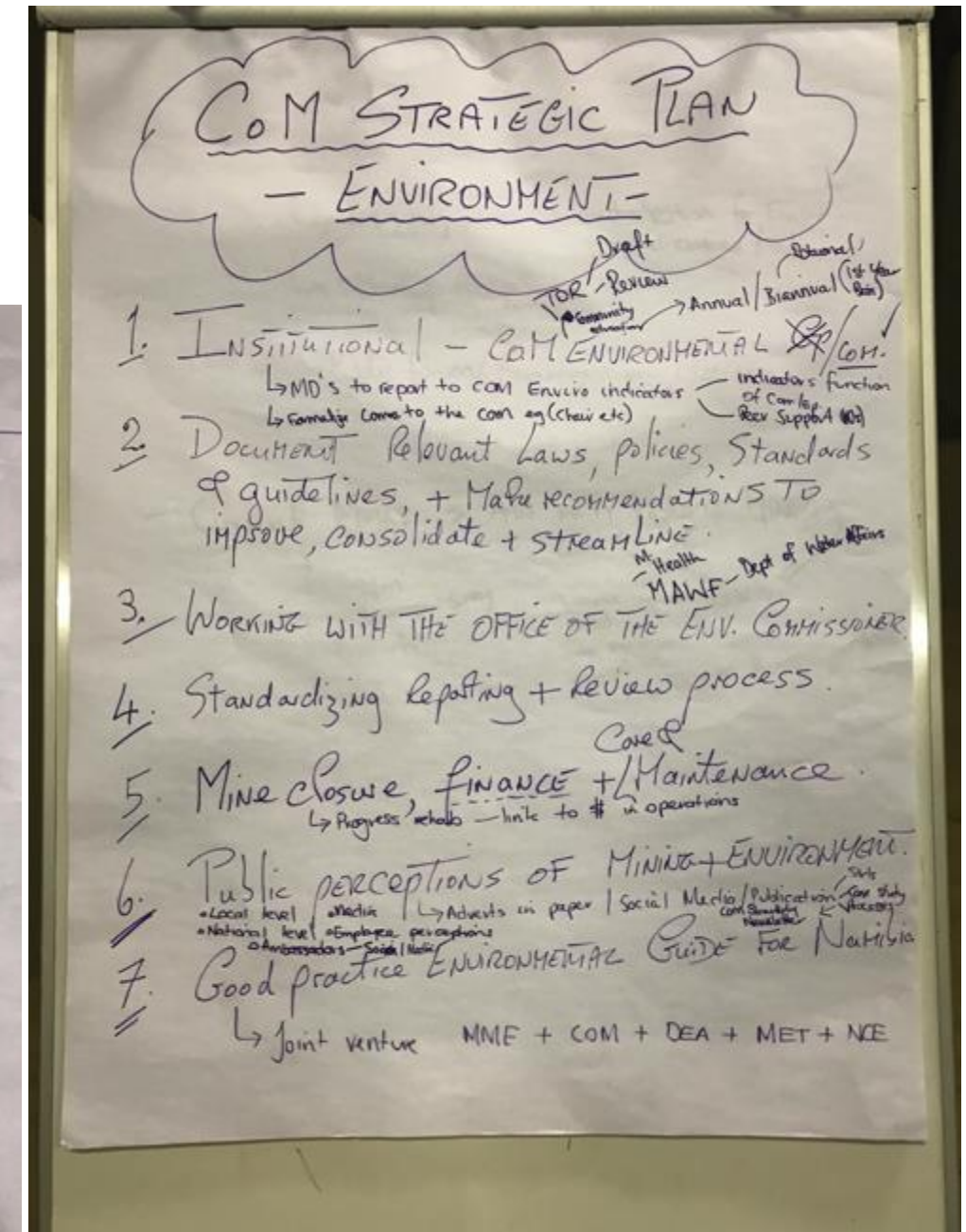
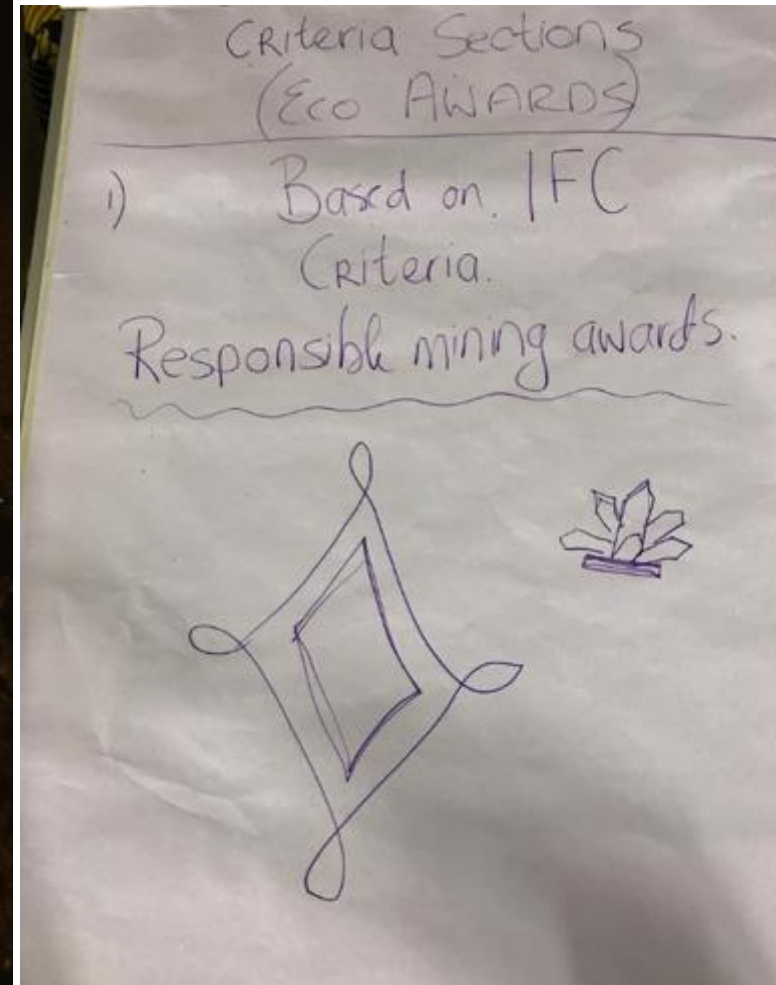
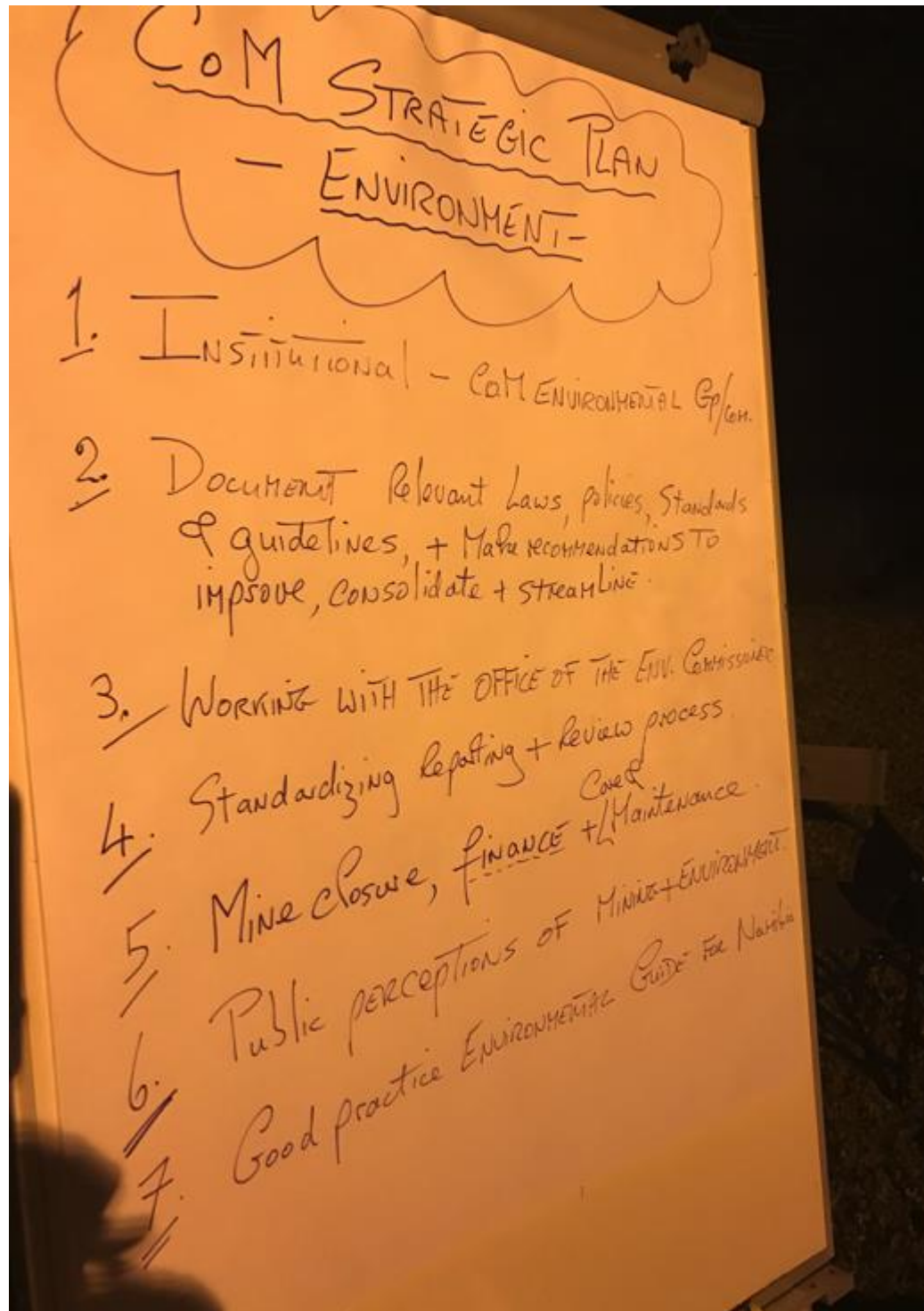


ANEXURE A – WORKSHOP BASELINE INFORMATION

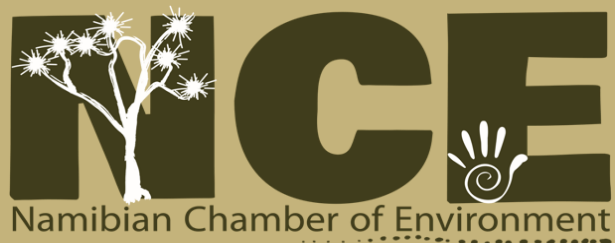




ANEXURE B – WORKSHOP PHOTOS



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PRODUCED BY



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