ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN FOR THE PROPOSED MINERAL EXPLORATION ON EPL 7912 IN THE NAMIB NAUKLUFT NATIONAL PARK WALVIS BAY DISTRICT, ERONGO REGION

APPLICATION NUMBER: 003708

FOR

TUMAS GRANITE CC

PREPARED BY:

outrun consultants cc

P. O. BOX 70822 KHOMASDAL,
WINDHOEK.
+264 812 683 578
outrungreeninfo@gmail.com

APRIL 2025

DOCUMENT CONTROL SHEET

DOCUMENT TYPE	**ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN FOR THE PROPOSED MINERAL EXPLORATION ON EPL 7912 IN THE NAMIB NAUKLUFT NATIONAL PARK IN ERONGO REGION.**
APPLICATION NUMBER	**APP: 003708**
DOCUMENT VERSION	**FINAL**
ENVIRONMENTAL CONSULTANT	**PROPONENT**
OUTRUN CONSULTANTS CC P. O. BOX 70822 KHOMASDAL WINDHOEK +264 812 683 578 outrungreeninfo@gmail.com	TUMAS GRANITE CC P. O. BOX 20244 WINDHOEK, NAMIBIA +264 811 283520 mark@nssnamibia.com
CONTACT PERSON **LEAD ENVIRONMENTAL ASSESSMENT PRACTITIONER** JOSIAH T. MUKUTIRI (MR)	**CONTACT PERSON** **MANAGER** JURGEN HOFFMANN (MR)
SIGNATURE: ……DATE:.03 / 01 / 2023	**SIGNATURE……..DATE: ..03 / 01 / 2023**

ENVIRONMENTAL SCOPING REPORT FOR THE PROPOSED MINERAL EXPLORATION ON EPL7912 IN WALVIS BAY DISTRICT, ERONGO REGION, NAMBIA.

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF ABBREVIATIONS

Abbreviation	Full Name
BID	Background Information Document
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
ESIA	Environmental & Social Impact Assessment
ESMP	Environmental & Social Management Plan
MEFT	Ministry of Environment, Forestry and Tourism

DEFINITION OF TERMS

"Biome" A biome is described as an area with similar vegetation and includes all animal life that lives in that area.

"**Competent authority**" is defined as an organ of state which is responsible, under any law, for granting or refusing and authorisation; or the competent authority identified in terms of section 30 of the EMA, Act, 2007.

"Environment" – this refers to the ecology, economy, society and politics.

"**Listed activity**" means an activity listed in terms of section 27 (1) or 29.

"Mineral exploration" is the process of finding ores (commercially viable concentrations of minerals) to mine. Mineral exploration is a much more intensive, organized and professional form of mineral prospecting and, though it frequently uses the services of prospecting, the process of mineral exploration on the whole is much more involved.

"**Organ of state**" means any office, ministry or agency of State or administration the local or regional sphere of government or any other functionary or institution: exercising a power or performing a function in terms of the Namibian Constitution or exercising a public power or performing a public function in terms of any law but does not include a court or judicial officer.

"**Proponent**" means a person who proposes to undertake a listed activity.

"Public" refers to the community or people in general.

"Stakeholders" – this refers to the people, organisations, NGOs that are directly or indirectly affected by the project and / or have an interest in the project.

PURPOSE OF THE DOCUMENT

The Environmental & Social Management Plan (ESMP) was compiled as part of the Environmental & Social Impact Assessment (ESIA) for the proposed mineral exploration activities on EPL7912 in Walvis Bay District in Erongo Region. It describes the proposed mitigation measures and management plan for the potential negative impacts identified for the respective exploration activities presented in the Environmental Scoping Report (ESR) accompanying this ESMP. It is a legal document which forms the basis upon which the Environmental Clearance Certificate will be issued, and failure of implementation will be violation of the Environmental Management Act (EMA) and is a chargeable offence. The ESMP will be submitted to the Ministry of Mines and Energy (MME), Competent Authority and the Ministry of Environment, Forestry and Tourism (MEFT) for approval. The decision from the MEFT will be communicated to the registered I&APs as required by the EMA.

DOCUMENT STRUCTURE / ROAD MAP

The ESMP is intended to meet all requirements as stipulated in the Environmental Management Act (2007) and its Regulations of 2012. To provide clarity to the reader, a document roadmap is provided in terms of the regulatory requirements (Table 1):

CHAPTER	TITLE	OVERVIEW
	Purpose of the Environmental & Social Management Plan	N / A
	Document Road Map	N / A
1	Introduction	This section contains project background information about the proposed exploration project.
2	Legal Authorisation	National legal requirements
3	ESMP matrix	Mitigation measures, ESMP monitoring and implementation budget.
4	Conclusion and Way Forward	Conclusion based on the proposed ESMP.
5	List of References	List of references quoted in the document

1 INTRODUCTION

The proponent, TUMAS GRANITE CC (TG) is planning to embark on exploration of dimension stone, nuclear fuels, base and rare metals and industrial minerals from EPL 7912 located in Walvis Bay District in Erongo Region. The planned work will progressively include geophysical surveying, geological mapping and sediment geochemical sampling and testing. Mineral exploration activities are listed activities that require an Environmental Clearance Certificate (ECC) from the Ministry of Environment, Forestry & Tourism (MEFT). It is against this background that the Proponent appointed an independent consultant, Outrun Consultants CC to conduct the Environmental & Social Impact Assessment (ESIA) to comply with the requirements of the Environmental Management Act (2007). An Environmental Scoping Report (ESR) was generated from the ESIA process and will be submitted to the Competent Authority as an accompanying document to this ESMP for the purposes of applying for an ECC.

1.1 Project Location

The proposed project is in the Namib Naukluft National Park in Erongo region, and the locality map of the proposed project is shown in Figure. 1 below.

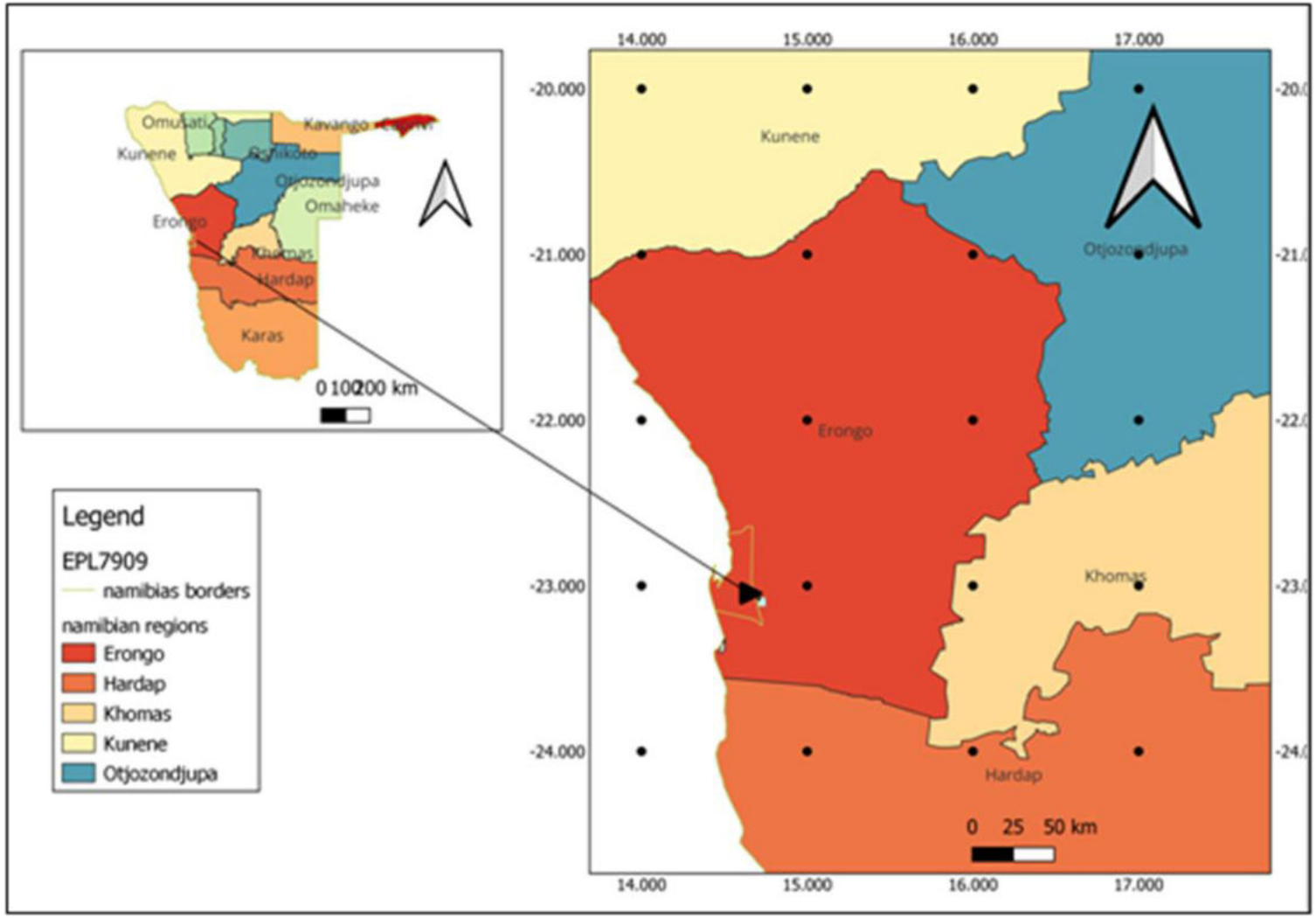
Omusati
Kavango
Kunene
Otjozondjupa
Omaheke
Erongo
Khomas
Hardap
Karas
0 100200 km
14.000
15.000
16.000
17.000
-20.000
-21.000
-22.000
-23.000
-24.000
Kunene
Otjozondjupa
Erongo
Khomas
Hardap
0 25 50 km
Legend
EPL7909
namibias borders
namibian regions
Erongo
Hardap
Khomas
Kunene
Otjozondjupa

Figure 1: The location of the project area (EPL 7912) in Walvis Bay District, Erongo Region.

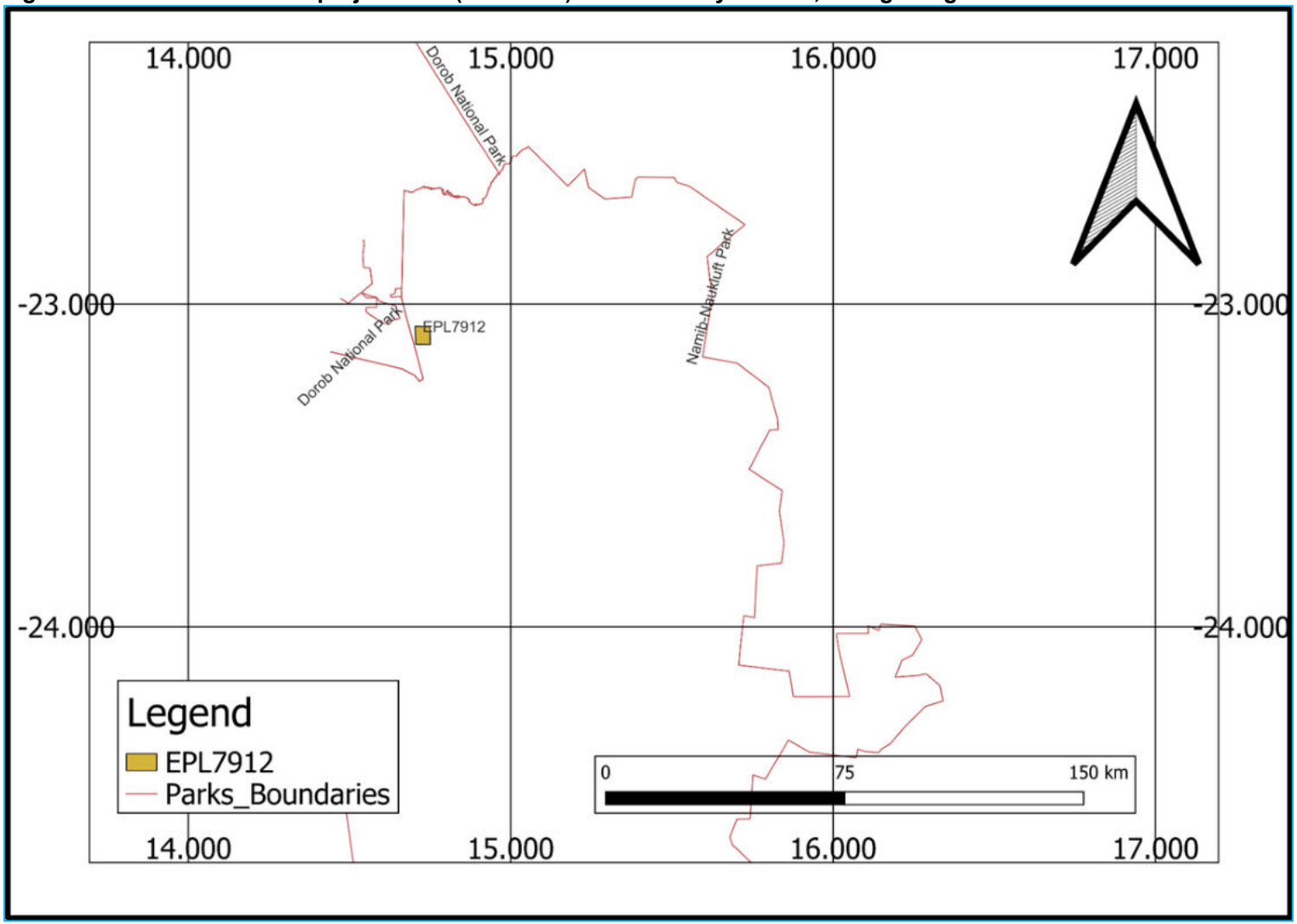

Figure 2: The location of EPL7912 in the Namib Naukluft National Park in Erongo Region. Source: Own map.

2 LEGAL AUTHORISATION AND RESPONSIBLE PARTIES

2.1 Legal authorization

The construction of facilities for any process or activities which requires a license, right or other form of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act), 1992.
b) Other forms of mining or extraction of any natural resources whether regulated by law or not. 3.3 Resource extraction, manipulation, conservation and related activities.

2.2 Responsible parties

TG's Environmental Manager is primarily responsible for the implementation of the ESMP during all the mineral exploration phases. TG, as the Proponent, is responsible for:

- Ensuring that the objects of the ESMP are being obtained.
- Ensuring that all environmental impacts are managed according to the environmental principles of avoiding, minimizing, mitigating and rehabilitation. This will be achieved through the successful implementation of the ESMP.
- Ensuring that appropriate monitoring and compliance auditing are executed.
- Ensuring that the environment is rehabilitated to its natural state as far as possible.

TG shall ensure that all employees attend an Environmental, Awareness Training Course. This course shall be structured to ensure that attendees:

- Become familiar with the environmental controls contained in the ESMP.
- Are made aware of the need to conserve water and minimise waste.
- Are made aware of TG's Code of Conduct.
- Are aware that a copy of the ESMP is readily available at the plant and that all staff are aware of the location and have access to the document.
- Are informed that employee information posters, outlining the environmental "dos" and "don'ts" (as per the environmental awareness training course) will be placed at prominent locations throughout the site.

3 ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN (ESMP)

3.1 Introduction

The environmental management plan presents a summary of management initiatives that will be required to ensure the identified potential negative and positive impacts are mitigated and maximized respectively. However, this ESMP will be focusing on negative impacts presented in the ESR which should be read together with this document. Indicators are suggested for each identified impact, and this is followed by the assigned responsible implementing agent and the monitoring frequency.

The proposed plan for monitoring the potential impacts during the mineral exploration project activities and decommissioning are also presented in this Chapter. The ESMP is also aimed at ensuring continued compliance even after the duration of project. It is important that the proponent implements this ESMP with reference to the impact analysis and evaluation chapters which details the impacts and the suggested mitigation measures (ESR). It is the Proponent's responsibility to enforce and ensure that the environmental obligations arising from this ESMP are always met during the project life cycle.

This ESMP relates to environmental and social management initiatives that apply to the identified potential negative and positive impacts of the activities of the holder of EPL 7912. Impacts caused and left without rehabilitation or mitigation by previous mineral licence holders are not the responsibility of the proponent.

Table 1: Environmental & Social Management Plan

ACTIVITY	ENVIRONMENTAL ASPECT	IDENTIFIED IMPACT	POSITIVE \NEGATIVE	SOURCE	MITIGATION	INDICATOR (S)	IMPLEMENTING AGENT	RESPONSIBLE AGENT	MONITORING AGENT	MONITORING FREQUENCY
EXPL ORATION PLANNING PHASE										
Setting up of surface structures such as office, store rooms, kitchen. Toilets and sample handling and preparation area etc.	**Land degradation**	Vegetation loss	-ve	Land clearing	Settle where there is minimal or no vegetation as much as possible. Avoid settling where there are sensitive habitats.	Vegetation cover	Exploration Manager	TG	MEFT	At the planning and exploration phase.

Movement of personnel, equipment, materials, water etc.	**Land degradation**	Vegetation loss	-ve	Land clearing	Use existing tracks and avoid making new roads.	Vegetation cover.	Exploration Manager	TG	MEFT	At the planning and mobilization to site in preparation for exploration work.

ACTIVITY	ENVIRONMENTAL ASPECT	IMPACT	POSITIVE \NEGATIVE	SOURCE	MITIGATION	INDICATOR	IMPLEMENTING AGENT	RESPONSIBLE AGENT	MONITORING AGENT	MONITORING FREQUENCY
EXPLORATION PHASE										
Soils and rock sampling	**Soil and rocks**	Land degradation	-ve	Excavation of top soil and rock outcrops during sampling	Avoid digging steep slopes prone to erosion and digging out plants. Close sampling holes after collecting sample.	Eroded and disturbed landscapes.	Project Geologist	TG	MEFT	During the middle and end of the exploration phase

Geological core drilling	**Air pollution from dust, smoke etc** Fugitive dust comprising total suspended particulates and $PM_{10.}$	Dust irritates workers at the site. Causes and / or contributes to respiratory illnesses.	-ve	Trenching and Core drilling.	Use of water and providing dust masks to employees during drilling; Contractors should have appropriate adequate personal protective equipment; No vehicles should be left unnecessarily idling.	Dust count	Contractor	TG	MEFT	During the middle and end of the exploration phase

ACTIVITY	ENVIRONMENTAL ASPECT	IMPACT	POSITIVE \NEGATIVE	SOURCE	MITIGATION	INDICATOR	IMPLEMENTING AGENT	RESPONSIBLE AGENT	MONITORING AGENT	MONITORING FREQUENCY
					have undergone safety training.					
	Noise	Noise pollution irritates and impairs Operators' hearing.	-ve	Drilling using poorly maintained equipment.	Ensure regular maintenance of equipment, machinery and vehicles; and provide appropriate PPE to employees, ear plugs; Define and obey speed limitations for exploration mobile equipment and vehicles; Turn off machinery and equipment when not in use;	Decibels	Contractor	TG	Ministry of Labour, Industrial Relation & Employment Creation	Quarterly during the exploration work

	Land degradation	Vegetation loss	-ve	Land clearing	Anchor rigs or position drill holes where there is minimal environmental disturbance i.e. no vegetation if possible. If unavoidable then plants should be relocated for future rehabilitation.	Vegetation cover.	Exploration Manager	TG	MEFT	At the exploration phase in preparation for exploration work.
Trenching and geological core drilling	**Land use change**	Loss of tourism functions in the area	-ve	The area will be restricted from the public or visitors.	Identify other areas from the exploration activities for similar tourism activities.	The picnic area within the EPL should be restricted from the tourists.	Exploration Manager	TG	MEFT	During exploration
Fueling of vehicles, machinery and other equipment	**Chemical spills**	Soil contamination or pollution from hazardous products such as petroleum products	-ve	Accidental spillages, inadequate waste receptacles, servicing equipment onsite, poor	Above ground fuel storage tank must be bund walled with impermeable coating on the surface and a volume of 200% of the stored material; Prevent spillages; Use drip trays when vehicles have leaks, No major servicing of equipment onsite, Fuel storage and handling should be done on areas	Oil and fuel spills, waste runoff from toilets	Exploration Manager	TG	MEFT	During exploration.

		e.g. lubricants, fuel and coolants.		maintenance of vehicles and equipment.	prepared for that purpose only; Spillage control procedures must be in place; Adequate containment for toilet facilities should be provided; Liquid waste from toilets should be properly contained to avoid leakages and / or spills and should be regularly be disposed of at a suitable sewage disposal site; Runoff due to overflows should be avoided at all costs; Proper environmental awareness and remedial response training of exploration team must be conducted on a regular basis;					

ACTIVITY	ENVIRONMENTAL ASPECT	IMPACT	POSITIVE \NEGATIVE	SOURCE	MITIGATION	INDICATOR	IMPLEMENTING AGENT	RESPONSIBLE AGENT	MONITORING AGENT	MONITORING FREQUENCY
Geophysical surveying	**Airborne survey**	Disturbs breeding wildlife and birds and has potential to cause accidents with planes	-ve	Fying drones during geophysical survey	Ensure no flying drones in birds breeding areas; Fly the drones only on designated flight heights; No flying drones close to the ground. No flying drones without a permit from NCAA and MEFT.	Number of flights and permits issued by MEFT; Number of incidences / accidents etc	Exploration Manager	TG	MEFT	At the exploration phase in preparation for exploration work.
Trenching and geological core drilling	**Aesthetics**	Visual impacts / aesthetics	-ve	Vehicle tracks and foot paths.	Broom sweeping	Occurrence or frequency of tracks and foot paths	Contractor	TG	MEFT	Quarterly during the exploration period and at decommissioning.

	Ground water pollution	Contamination of ground water	-ve	Drilling into the water table and introducing toxic chemical based coolants	Use biodegradable coolants. There are available on the market and cost is no excuse for noncompliance. All drill holes should be sealed immediately after use.	Ground water quality	Contractor and the Exploration Manager	TG	MEFT	Quarterly during exploration work.

3.2 ESMP Management Actions

The ESMP presented above is supported by the guiding notes presented below. The Proponent should familiarize with this section for a better understanding of the summarized ESMP framework.

Exploration Planning

The following controls will be implemented during the exploration planning phase:

- All drill rigs to be used on site will be fitted with the appropriate dust and noise suppression equipment (e.g. water sprays and mufflers),
- Any requirements for discharging of water should be identified during exploration planning and the appropriate consultations done.

Controls

The following controls will be implemented during the operational phase of exploration activities:

- all equipment used on site will be maintained in good working order.
- pre-start inspections of equipment will include inspections of noise and dust controls to ensure they are always operational.

Waste Management and Pollution Prevention

To prevent the improper disposal of waste and to prevent pollution, the following management actions shall be enforced:

- All waste will be removed to an appropriate waste dump,
- No waste should be buried.

General Waste: Includes wastepaper, plastic, cardboard, harmless organic (e.g. vegetables) and domestic waste.

- No littering will be allowed. The camping and exploration area will be kept free of waste at all times.
- Provide sufficient waste bins at worksites.
- Make sure that all waste is removed from the worksites.

Hazardous Substances include sewerage, fuels, lubrication oils, hydraulic and brake fluid, solvents, paints, anti-corrosives, insecticides and pesticides, chemicals, acids etc. It should be disposed of at designated hazardous disposal sites.

- Contaminated soil should be stored in drums and taken to the nearest appropriate waste dumpsite.
- Do not change oil on uncovered ground. Drip trays will be used to catch oil when vehicles are repaired in the field.
- Used oil and hydraulic fluids will not be discarded on the soil or buried. It will be removed from site and taken back to an appropriate dump.
- In the event of a hazardous spill:
    - Immediately implement actions to stop or reduce the spill.
    - Contain the spill.
    - Arrange implementation of the necessary clean-up procedures.
    - Collect contaminated soil, water and other materials and dispose it at an appropriate waste disposal site.
- Used solvents and grease should be stored in drums or other suitable containers. It should be sealed and recycled or disposed at an appropriate disposal site.
- Hazardous waste should not be burnt.
- Bunding, concrete slabs and/or other protective measures should be installed where hazardous materials are handled.
- Ensure that the staff are informed and have information pertaining to the management of spills or ingestion.

3.2.1.1 Controls

The following controls will be implemented during exploration to ensure compliance with the above requirements and to minimize potential impacts associated with waste management.

Operational Control

- Exploration areas will always be maintained in a clean and tidy condition.
- All wastes, including sanitary wastes, will be collected, segregated and stored in properly constructed containers and removed to an approved landfill or other disposal site in accordance with local council requirements.
- All chemicals, fuels and oils will be appropriately bunded.

- A supply of appropriate spill and dust prevention and oil absorbent materials should be maintained at all drill sites.
- All drill cuttings and fluids will be contained in above-ground tanks or in-ground sumps. Any drilling additives used will be non-toxic and biodegradable.
- Any soil contaminated by chemicals, oils and fuels, or drilling mud or drill core containing toxic metals will be collected and disposed of in an approved manner, and the site rehabilitated.
- No servicing of equipment is to be undertaken on site.

Vegetation

The project is being implemented in an area endowed with protected and endemic plant species and it is important for the Proponent to ensure that the Environmental Control Officer identifies species of concern as the exploration target become known. This should be guided by the preidentified areas in the scoping report, the gravel plains, ephemeral rivers and the rocky hills. Any identified protected and endemic plant species should be collected and planted in a greenhouse for future replanting during rehabilitation. The Proponent is recommended to liaise with the Namibia Botanic Gardens (NBG) for assistance. Beyond that the following recommendations were formulated to ensure environmental commitment:

- Use existing tracks to access the exploration site. Should new tracks need to be explored, sensitive areas should be avoided always. This is to ensure minimal or no degradation to the area.
- Fires should be properly exterminated after use and firefighting equipment should be provided and be in good working order.
- No collection of flora or firewood should be allowed in the project area including dead wood.
- No poaching or any form of hunting during exploration.

Landscape Visual Impacts

Vehicle tracks and foot paths will be broom swept to match the natural environment. In addition to that it is important to make sure supportive action plans are put in place:

- Use only one access road or track from the main road and should be marked.
- Chose tracks with minimal impact or that do not pass through sensitive areas.

- Drivers should use the three points turn only rather than circling.
- If necessary, drive on riverbeds rather than on riverbeds.
- No hard bracking and speeding.
- Drivers should engage 4-wheel drive to reduce risk of getting stuck in the desert sands.
- Tracks should be rehabilitated when exploration is completed.

Drill holes and offroad driving by the drill rig

- The access roads and tracks should be visibly marked with reflective materials on either side of the road.
- The site should be accessed using existing roads and tracks as much as possible.
- Only drill rig and supporting truck will be allowed to leave access tracks to the drill points and use the same way back to the track.
- Drill holes will be sealed, surveyed and marked for easy identification in the future.

Waste Management

All remaining refuse, chemicals, fuels and waste materials will be removed from the site following the completion of drilling activities.

Surface Structures such as offices, kitchen and ablutions facilities

- The location of each worksite camp shall be guided by minimal environmental disturbance principle.
- The site should be considered in accordance with minimal requirements of the NNNP Management and approval or guidance should be sort from park authorities.
- Wastewater from the showers and the kitchen will be drained through a soakaway trench.
- All surface structures erected on the exploration site will be removed on decommissioning and all waste removed and leave it clean and tidy.

Environmental Awareness

- Instilling a sense of environmental awareness and consideration in all employees, but especially ESMP. It is therefore recommended that a general environmental awareness training course targeting the Exploration Team members be undertaken.

Health and Safety

To minimise the risk of the occurrence of injuries the following management actions shall be enforced:

- Make sure that all staff are equipped and know how to use safety and protective gear. This includes hard hats, goggles, hearing protectors, dusk masks, steel-toed shoes etc.
- Keep a comprehensive first aid kit at the site.
- Establish an emergency rescue system for evacuation of serious injured people.
- Emergency procedures for accidents should be communicated to all employees.
- Dangerous areas must be clearly marked and access to these areas controlled or restricted.
- Good driving and adherence to safety rules will result in a minimum number of road and workplace accidents.
- Fire extinguishers must be available at all refuelling sites. Staff should be trained to handle such equipment.
- Nobody is allowed to dispose a burning or smouldering object in an area where it may cause the ignition of a fire.
- Hazardous substances must be kept in adequately protected areas to avoid soil, air or water pollution.
- Work areas, such as these for the maintenance of equipment, must be on concrete slabs.
- Explosives should be stored according to the prescribed regulations.

3.2.1.2 Gender Based Violence (GBV), HIV / AIDS and Sexual Exploitation & Abuse (SEA).

Gender-based violence is defined by the United Nations Multilingual Terminology Database (UNMTD), as physical, mental or social abuse (including sexual violence) that is attempted or threatened, with some type of force (such as violence, threats, coercion, manipulation, deception, cultural expectations, weapons or economic circumstances) and is directed against a person because of his or her gender roles and expectations in a society or culture. In circumstances of GBV, a person has no choice to refuse or pursue other options without severe social, physical, or psychological consequences. Forms of GBV include sexual violence, sexual abuse, sexual harassment, sexual exploitation, early marriage or forced marriage, gender discrimination, denial (such as education, food, freedom) and female genital mutilation". GBV is rooted in structural inequality in power relations between women and men (UNFPA, 2010).

Violence against women and girls has devastating short and long-term consequences on their health and wellbeing. These include physical injuries, depression, anxiety disorders, and even death. It is linked to negative outcomes in sexual and reproductive health, including unintended pregnancies, increase risks of miscarriage, unsafe abortions, stillbirth and increased vuTGrability to HIV and other sexually transmitted infections. It places significant demand on the health, social, justice system and economic sector. It has been observed that influx of many different people into a community disintegrates the social fabric resulting in lack of respect, bad attitude, and bad behaviour compounded by drug / alcohol abuse increase the risk of GBV, HIV and SEA. Coupled with increase in disposable income, such cases can increase tremendously to the detriment of the community in which the project is being implemented.

3.2.1.2.1 Integration of HIV / AIDS and Gender related issues in the EIA process in Namibia

There is evidence that links large scale projects such as infrastructure development with increased prevalence of HIV rising mainly from the large numbers of migrant workers. In Namibia, integrating or mainstreaming health and social issues into the EIA process is one practical way to ensure that large scale project purposefully consider these during the project life cycle. Failure to mainstream HIV and gender issues negatively impacts the efforts to improve livelihoods and socio-economic welfare of the people. Analysis of the EMA Act shows that HIV and gender can be factored into the EIA process at many different stages of the assessment and the various stakeholders can be actively engaged for this purpose as well. However, there is need for enforcement of the EMA Act and regulations led by MEFT to guide the scope and content of ESMPs and their implementation.

3.2.1.2.2 Namibia's Corona virus disease (Covid – 19) / Occupational Safety and Health Guidelines of 2021.

Covid – 19 is a viral disease which affects the upper respiratory system and manifests itself like a flu. Patient shows symptoms of fever, runny nose, sneezing, cough, shortness of breath and generally body weakness. In response to the outbreak, the government of Namibia put in place response guidelines to combat the devastating effects of the disease.

3.2.1.2.3 Purpose of the guidelines

- To promote the integration of Covid – 19 prevention and management into the broader workplace safety and health management.
- To outline the minimum preventive measures that employers should take to curb the spread of Covid – 19 at workplace.

Policies and procedures

In respect of the guidelines the following is required for all Employers:

a. An Employer should develop and implement an OSH policy that incorporates Covid – 19 in consultation with OSH committee. The written policy shall contain a declaration of the management commitment to reduce the risk of exposure to occupational hazards including the transmission of Covid – 19 at the workplace.
b. Develop a Preparedness and Response Plan (PRP) for Covid – 19 in considering all work areas and tasks performed by workers and potential sources of exposure.
c. Develop a procedure setting out the steps describing who, what, where, when and why establishing compliance and accountability actions.
d. Develop flexible attendance and sick leave measures that encourage employees to stay home when sick or when caring for the sick family members on well-defined terms and conditions.

3.3 Action to be taken in order to integrate HIV, Covid and gender-related issues

Government authorities (Environmental Commissioner, Organ of State and Line Ministry)

- Check that the Proponent's budget for health management and gender / social issues are separate line items and are sufficient to cover all the required measures, and;
- Check that the Proponent has identified specific personnel to manage the health and gender/ social programmes (internal staff, NGOs, Community based organisations (CBOs) and Consultants).

Proponents

- ESMPs are incorporated into the standard exploration procedures (SEP).
- Mainstream HIV and management of gender / social issues into SEPs.
- Ensure that the budget for health (HIV) management and social (especially gender) issues are separate line items and are sufficient to cover all required measures.
- Identify and recruit specific personnel to manage the health and gender programmes.

Grievance redressal mechanism

The grievance management mechanism will be established by the project proponent to extend an opportunity to all the stakeholders, particularly those affected by the project to air their views on the project proposals. This will form a channel to allow two-way communication from the lowest level to the top and vice-versa and in a way allow access to information and to cascade

resolutions. Grievances will be handled by the Exploration Team Leader and will include the following steps and timelines:

- Provide for communication of the issue / concern by the concerned party / stakeholder.
- Open discussion of the issue by project team and proponent to formulate resolution(s).
- Provide for communication of the resolution to the concerned stakeholder(s).
- Provide for an appeal process if the stakeholder is not satisfied with the proposed resolution of the complaint.

If the stakeholder is still unsatisfied then they should be advised of their right to legal recourse. It is important to have multiple and widely known ways to register grievances. Anonymous grievances can be raised and addressed. The grievance registration form is attached at the end of this report under Annexure 1. Several uptake channels to consider include:

- Walk-ins at focal point, Exploration site office
- Emails
- Telephone calls

Once an issue is received it must be recorded and resolved within a specified period. All issues should be reported on and followed up during monthly progress meetings.

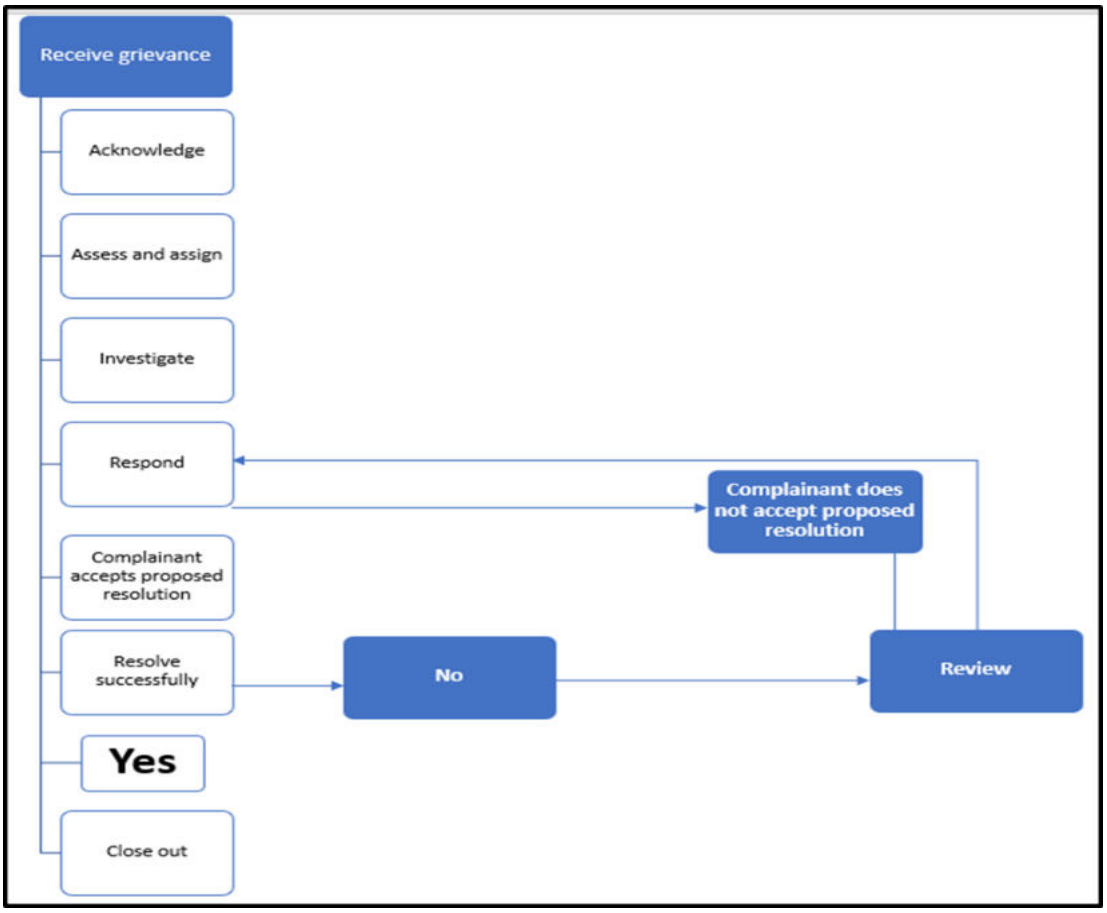

Figure 3: Grievance redressal mechanism process flow.

Site Closure and Rehabilitation

It is the process of returning the land in each area that has been disturbed by construction and earthworks to some degree of its former state, or an otherwise determined state. Many projects, if not all, will result in the land becoming degraded to some extent. However, with proper rehabilitation most impacts associated with the mineral exploration project, could be mitigated and restored to an acceptable level. Poorly rehabilitated exploration areas provide a difficult legacy issue for governments, communities and companies, and ultimately tarnish the reputation of operators. Objectives of proper site closure and rehabilitation include the following:

- Reduction or elimination of the need for a long-term management program to control and minimise the long-term environmental impacts.
- Clean-up, treatment or restoration of contaminated areas (e.g. soils contaminated by oil or fuel spills, concrete spills, etc.).
- Excavation of contaminated material and disposal thereof in an acceptable manner.

Rehabilitation measures to implement:

- A site inspection will be held quarterly by the Environmental Manager after every phase during exploration. Rehabilitation will be done to the satisfaction of the MEFT.
- Frequent inspections of the equipment and effective follow-up procedures, to prevent minor defects from becoming major repair jobs.
- Make sure all soil polluted during exploration and maintenance work is properly stored in drums and removed to an appropriate waste dump.
- Make sure all windblown litter is removed once maintenance has seized.
- Make sure that all potential hazards (i.e. the sewerage pit) are properly closed and left in a safe and neat position.

Rehabilitation will be completed when the above have been achieved and should be completed as soon as possible after the cessation of exploration work, before demobilization and / or the expiry of the licence.

3.4 Institutional arrangement for ESMP Implementation

The proposed project is being undertaken by TG, a privately owned company. Its business objectives are exploration nuclear fuels, industrials minerals, base and rare earth metals in Southern Africa. This ESMP was compiled as part of the ESIA being undertaken for the proposed project in accordance with the requirements of the Environmental Management Act (EMA), No.7 of 2007 and the Environmental Impact Assessment Regulations, No. 30 of 2012. The EMA is implemented by various stakeholders, organs of state and agents. The Minister of the Ministry of Environment, Forestry & Tourism (MEFT) is responsible for developing policies for the management, protection and use of the environment, prepare and publish policies, strategies, objectives and standards for the management of the environment, coordinate environmental management at national level and monitor and ensure compliance with EMA. The implementation of the act directly rests with the Environmental Commissioner (EC). The EC advises Organ of state on the preparation of environmental plans, receives and record applications for ECCs and the overall management, protection, reviewing of assessment report and enforcement of monitoring and implementation of environmental plans in accordance with the EMA. Other Ministries, Government agencies, Local Governments and Traditional Authorities participate in the ESIA process for activities that are within their mandate and conduct inspections for monitoring compliance with EMA relevant to their Ministry. According to MEFT, Erongo Regional Council have not been delegated as such and projects taking place there rely on MEFT enforcement.

There is need for capacity building of these institutions focused on EIA reviews, ESMP implementation and enforcement.

Estimated overall annual ESMP implementation budget

An estimated overall annual budget for the implementation of all environmental and social measures is provided in the table below.

Table 2: Estimated overall ESMP implementation budget.

Impact / activity	**Estimated Cost (Nam$)**
Solid waste management	50 000.00
Soil contamination	120 000.00
Nosie monitoring	30 000.00
SEA / GBV / HIV AIDS	150 000.00
EIA review, ESMP implementation and Enforcement Capacity building program (Erongo Regional Council and local tourism associations)	150 000.00
Total	**500 000.00**

4 CONCLUSIONS AND WAY FORWARD

4.1 Conclusion

This report was compiled from information obtained from relevant authorities, stakeholders, technical experts and professionals. It has presented the context, the setting and the social and economic environment influencing the envisaged project, benefits of the project and the environmental scope. The proposed mineral exploration project in the Erongo Region poses potential environmental damage in the form of destruction of the landscape and aesthetic view of the desert and disturbance of the natural environment. However, the predicted environmental impacts can be managed resulting in minimal or insignificant residual effects through the successful implementation of the proposed Environmental and Social Management Plan.

4.2 Way forward

The final ESMP will be submitted to MEFT: DEA. The decision made by MEFT: DEA will be made known to all registered I&APs and stakeholders.

5 REFERENCES

Bertram, S. and Broman, C. M. 1999.Assessment of Soils and Geomorphology in central Namibia. Swedish University of Agricultural Sciences, International Office, Uppsala, Sweden.

Namibia Botanical Research Institute. (2013). A Checklis of Namibian Indigenous and Naturalised Plants. Windhoek: Namibia Botanical Research Institute.

National Planning Commission, 2012.Namibia Population and Housing Census Preliminary Results, Windhoek, Republic of Namibia.

S. A. Ipinge, W. R. Lechner and E. S. Monyo, 1994. Farmer participation in on-station evaluation of plant and grain traits: the case of pearl millet in Namibia: in Drought tolerant crops for Southern Africa: Proceedings of the SADC / ICRISAT Regional Sorghum and Pearl Millet Workshop, Gaborone – Botswana.

Sadler. B, 1996. Environmental assessment in a changing world: evaluating practice to improve performance. International study of the effectiveness of environmental assessment. Final Report. International Association for Impact Assessment/Canadian Environmental Assessment Agency. Minister of Supply and Services, Canada.

Namibia Botanical Research Institute. (2013). *A Checklis of Namibian Indigenous and Naturalised Plants.* Windhoek: Namibia Botanical Research Institute.

ANNEXURE 1: GRIEVANCE REDRESSAL FORM

GIEVANCE REGISTRATION FORM

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT: THE PROPOSED MINERAL EXPLORATION ON EPL 7912 IN WALVIS BAY DISTRICT, ERONGO REGION.

KINDLY COMPLETE THIS FORM IN DETAIL AND RETURN TO:
TUMAS GRANITE CC
Environmental Manager / Site Foreman
Date…….Name & Surname……

Postal / Residential Address:……Email
……..……

Town…….…… Phone Number……..
Subject of grievance
……
…
Description of grievance
……
……
……
……**Date of receipt / acknowledge:……Complainant reference:……..**

Expected time of redressal:.....…….

If time not met:
Reason for delay of redressal……

Action to be taken…….

Updated time of redressal……...

Final redressal……

Action taken……

If Complainant is not satisfied advise on pathway to pursue the matter

SIGNATURE (s):
Complainant:……..Grievance Committee Chairperson……

Date:……Date:……