CC/2024/07232

TITLE OF THE PROJECT: ENVIRONMENTAL MANAGEMENT PLAN FOR EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 7405- 7407 LOCATED NEAR OTJOZONDU, IN THE OTJOZONDJUPA REGION

DOCUMENT VERSION: DRAFT

ECC RENEWAL APPLICATION NUMBER: 004757

PROPONENT

Proponent: Wepex Mining Resources (Pty) Ltd

Contact person: Stefanus Nambili

Telephone: +264 (0)61 218079

Email: nambilinat@gmail.com

ENVIRONMENTAL ASSESSMENT PRACTIONER (EAP) / CONSULTANCY

Author: Mr. Mandume Leonard

Company: Savannah Environmental Consulting Services

Telephone: +264 (81) 81 812 867 7

Email: savannahconsultants277@gmail.com

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1 INTRODUCTION

1.1 Project Background

Wepex Mining Resources Pty Ltd (*hereby referred as the proponent or Wepex Mining Resources in this document*) was issued an Environmental Clearance Certificate (ECC-01706) on 27 October 2021, to permit exploration works on EPL No. 7405 - 7407 until 27 October 2024. The proponent was given the right to conduct exploration and prospecting on EPL 7405 – 7407 for Base and Rare Metals, Industrial Minerals, Dimension Stones, and Precious Metals on the 1 928.3171 hectares located near Otjozondu in the Otjozondjupa region as shown in **Figure 1** below.

As per the requirements of the Environmental Impact Assessment (EIA) Regulations No. 30 of 2012 gazette under the Environmental Management Act, (EMA), 2007, (Act No. 7 of 2007), and a condition of the Environmental Clearance Certificate (ECC) issued for works on the EPLs, the proponent must appoint an independent consultant to carry out the renewal of the ECC once it expires and submit it to the relevant authority. The current ECC (ECC-01706) is valid between 27 October 2021 to 27 October 2022. Therefore, Wepex Mining Resources has appointed Savannah Environmental Consulting Services CC (*hereby referred as the consultant in this document*) to submit the ECC renewals on their behalf.

This Environmental Management Plan (EMP) has been developed to manage all the impacts identified during the project's Environmental Assessment (EA). Additionally, The EMP has been developed in terms of the Environmental Management Act (EMA) No 7, of 2007, EIA regulations of 2012, and other legislation binding to Namibia.

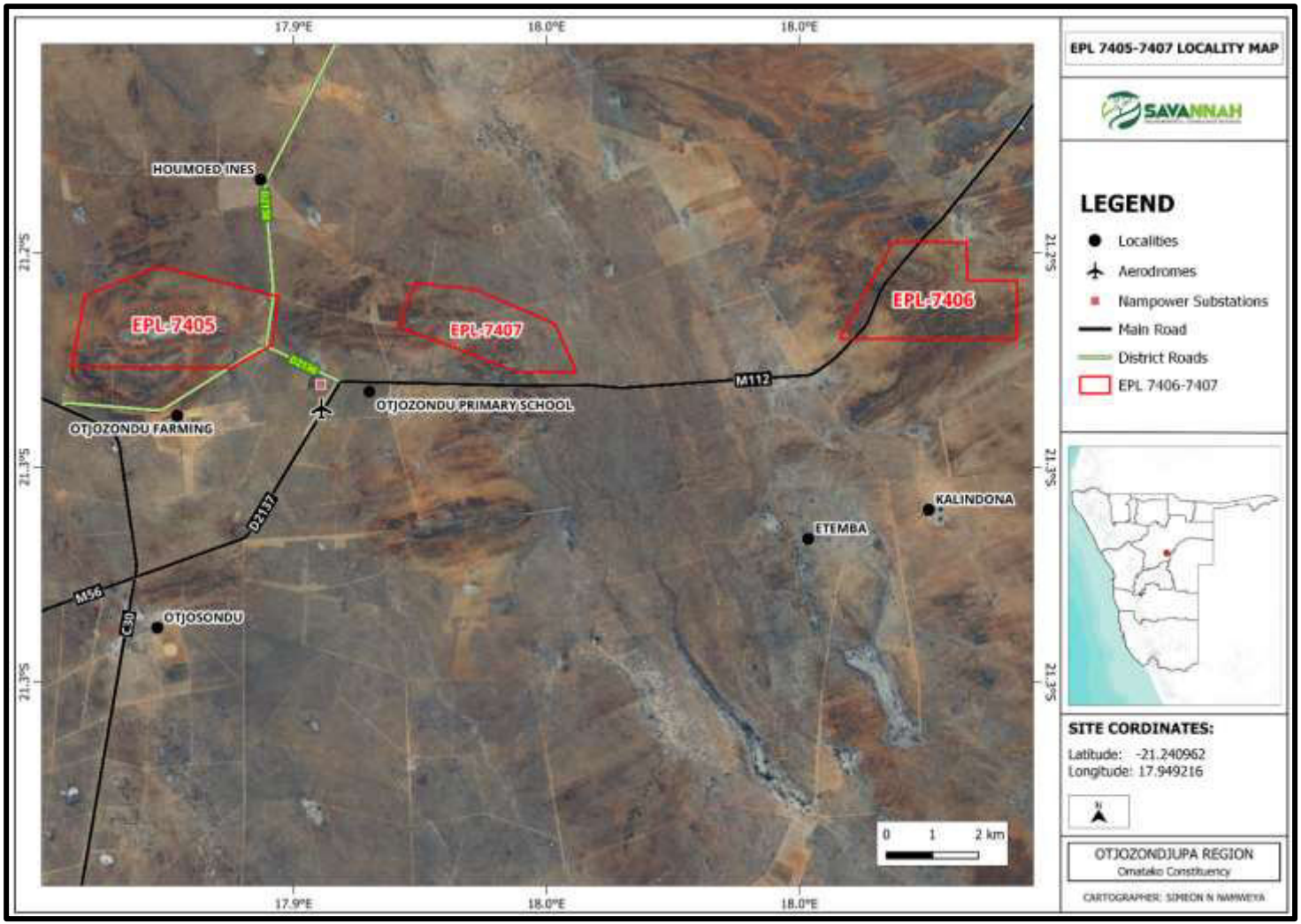

Figure 1: The Locality of the EPLs 7405 – 7407

2. GUIDELINES FOR THE PROPOSED PROJECT LEGISLATION, POLICIES AND ACTS

This section outlines the relevant legal frame works that the proponent should consider once the ECC of the proposed project is renewed.

The legislations included or identified in this document, need to be honored by the proponent, during the course of the project. The legal requirements provided here are those that are required for prospecting and exploration.

Table 1: Regulatory framework applicable to the project

Legislation / Policies / Guidelines	**Relevant Provisions**	**Relevance to Projects**
Environmental Management Act, 2007	Section 27: Requires Environmental Impact Assessments (EIAs) for activities that may impact the environment. Section 34: Requires environmental clearance certificates for activities impacting the environment.	Measures outlined in the EMP to mitigate environmental impacts during prospecting should be honored. Proponent should comply to all mitigation actions.
Minerals (Prospecting and Mining) Act, 1992	Section 50: Includes environmental obligations for prospecting activities.	The Proponent should Ensures that EPLs projects follow regulations to prevent environmental degradation during exploration activities.

Water Resources Management Act, 2013	Section 34: Protection of water resources from contamination and overuse.	The proponent must ensure that the mitigation measures provided in the EMP for the provisions for protecting water resources during prospecting, especially in water-sensitive areas are adhered to.
Pollution Control and Waste Management Bill	Provisions for waste management and pollution control.	The proponent must adhere to the waste management practices and pollution prevention measures in the EMP.
Forestry Act, 2001	Section 22: Prohibits the clearing of forest areas without proper authorization.	Should there be protected plant species, that are known to occur within the project site, and require removal for exploration operations to occur, a permit should be obtained from the nearest Forestry Office (MEFT) prior to removal.
Soil Conservation Act, 1969	Provides measures to prevent soil erosion and degradation.	The proponent must follow the soil conservation practices in the EMP to minimize land degradation.
National Heritage Act, 2004	Section 46: Protects heritage and archaeological sites from damage during prospecting.	The proponent must ensure that heritage and cultural sites within the prospecting area are identified and preserved.

Atmospheric Pollution Prevention Ordinance, 1976	Controls air pollution from industrial and mining activities.	The proponent should adhere to the measures to mitigate dust, emissions, and air pollution caused by prospecting activities.
Hazardous Substances Ordinance, 1974	Regulates the handling, storage, and disposal of hazardous substances.	The proponent must ensure the safe management of hazardous materials used during prospecting.
Labour Act, 2007	Provisions for health and safety of workers.	The proponent must ensure the health and safety measures to protect workers from hazards during prospecting activities.
Biodiversity Policy (2001)	Promotes biodiversity conservation and sustainable use of biological resources.	The proponent must adhere to the measures to prevent biodiversity loss and promote the protection of ecosystems during prospecting.
National Development Plan (NDP 5)	Emphasizes sustainable resource use and environmental protection.	Proponent must align with Namibia's sustainable development goals.
Namibian Constitution (Article 95)	Mandates the state to protect the environment and promote sustainable development.	The proponent should reflect Namibia's constitutional commitment to environmental protection and sustainability.

3. EMP ADMINISTRATION

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint an overall responsible person (project manager) to ensure the successful implementation of the EMP as highlighted below.

Table 2: Roles and Responsibilities in EMP Implementation

ROLE	ENVIRONMENTAL RESPONSIBILITIES
Wepex Mining Resources (Pty) Ltd	Responsible to enforce EMP implementation to contractors
Environmental Control Officer	• Implement, review and update the EMP. • Ensure all reporting and monitoring required under EMP is undertaken, documented and distributed as needed • Conduct environmental site training (tool box talks) and inductions with the support of an environmental consultant. • Conducts environmental audit at work site with the support of environmental consultant. • Close out all non-conformances. • Ensure materials being used on site are environmentally friendly and safe.
The Department of Environmental Affairs	• Approve the EMP and any amendments to the EMP. • Approve reports of environmental issues and non-conformances as issued. • Review and approve environmental reports submitted as part of EMP implementation
Environmental Consultant	• Conduct and monitor actions required by the EMP if required • Conduct environmental site training (tool box talks) and inductions if assistance is required • Conducts environmental audit at work site • Ensure materials being used on site are environmentally friendly and safe.
Site Technical Team	• Control and monitor actions required by the EMP. • Report all environmental issues to Environmental Control Officer. • Ensure documented procedures are followed and records kept on site. • Ensure any complaints are passed onto the management within 24 hours of receiving the complaint.
Workers	• Follow requirements as directed by site technical. • Report any potential environmental issues to site engineer/project manager, indicating spilt oil, excess waste, excessive dust generation, dirty water running off the site and other possible non-conformances

4. EMP Management Actions

The management actions aim to avoid potential impacts where possible. Where impacts cannot be avoided, management actions are outlined in order to minimize the significant impacts.

The tables below outline the specific management actions which need to be undertaken during the exploration phase of the development to ensure that the site activities are compliant.

3.1 MANAGEMENT ACTIONS DURRING EXPLORATION PHASE

The table below outlines the management actions to be undertaken during the exploration phase in order to ensure that the proponent complies with the EMP.

Table 3: Management action during the exploration phase

Impact	Description	Effects	Class	Responsibility	Action	Phase
Noise pollution	• Noise will be generated through: -Exploration activities by moving vehicles and machinery.	• The health of working personnel could be disturbed. • Community residents could be disturbed by the noise. • General annoyance - Driving away of local animals' species near • the project site	Environmental	• Environmental Control Officer • Site Manager	• Workers will be issued earplugs to protect them from excessive noise. • The public will be notified through a printed timetable stating planned operational activities. • Exploration activities will be conducted during the daytime, unless otherwise. • Site notices will be erected on, and around the site- notifying visitors, and nearby residents of different hazards on site.	**Throughout the exploration phase**
Dust Generation	Dust will accumulate because of the land preparation, onsite movements of vehicles and machines and also wind blowing on loose material.	• Can lead to respiratory illnesses especially to those working in the area. • General air pollution. • Nuisance to nearby residents	Environmental	• Environmental Control Officer • Site Manager	• Dust suppression will be done through watering dust sources surfaces. • All Exploration vehicles should not drive at a speed more than 30 km/h, to avoid dust generation around the area.	**Throughout the exploration phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
					• Watering down dusty surfaces, • Ensure that protective equipment such as respirators are distributed to employees, and ensure their use. • Site notices to be erected on and around the site to inform visitors and surrounding residents.	
Excavations, Steep slopes and unprotected areas	• Exploration activities may result in ground excavations during extraction of samples	Unprotected excavation are a safety hazard for those in the project area as well as animals	Safety	• Environmental Control Officer • Site Manager	• Ensure all dangerous areas are protected and barriers put in place. • All disturbed areas are to be rehabilitated to ensure public safety	**Throughout the exploration phase**
Loss of Biodiversity	• Vegetative plants on site will be removed • Habitat destruction for both ground dwelling species and tree dwelling species. • Soil disturbance on and around the site.	• The clearing of vegetation will result in the breaking of the ecosystem processes in the area. • Loss of aesthetic value of the	Environmental	• Environmental Control Officer • Site Manager	• Ground disturbance will only be limited to the boundary area to avoid affecting a large area. • Upon completion of exploration works activities rehabilitation of the exploration footprint affected area is recommended. A rehabilitation expert can be engaged.	**Throughout the exploration phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
		proposed project area. • The few small animals still habiting the place such as small rodents and birds will be forced away.			• Poaching of wildlife in the area is strictly prohibited. • Project workers should refrain from killing or snaring livestock that may be found on and around the site. •	
Bush fires	In areas that have vegetative cover bush /veld fires may arise	This may cause property damage as well affect habitats of any animals that dwell in and round the project area	Environmental	• Environmental Control Officer • Site Manager	• Where necessary construction of fire breaks / cutlines • Carry out awareness programmes on prevention of fire • At least three fire station must be available onsite during exploration	**Throughout the exploration phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
Greenhouse gas emissions	Green House Gasses (GHGs) emissions will be produced from the following activities: • Fuels combustion for (machinery, vehicles and equipment) • Ground excavation releases releases particulate matter into the atmosphere.	• Global climate change • Air pollution	Environmental	• Environmental Control Officer • Site Manager • Department of Environmental Affairs.	• Adopt the use of ethanol blended fuels wherever necessary. • Design an operation system that cuts on fuel consumption. • Use of solar energy system for lighting and other minor energy needs.	**Throughout the exploration phase**
Waste Generation	• Exploration activities are associated with a lot of raw material and activities that results in environmental pollution i.e plastics	• Pollution from oil spills resulting from the handling of various machineries used • empty packaging containers/bags and materials remnants. •	Environmental	• Environmental Control Officer • Site Manager	• Ensure that all waste from exploration activities is stored and contained in designated containers and transported to an approved waste disposal site. • All project employees should be sensitized to the impacts of soil pollution and advised to follow appropriate fuel delivery and handling procedures. • Visual inspections monitoring of oil spill ,garbage and any waste	**Throughout the exploration phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
					• No waste must be buried on site	
Safety and Health risks	General Safety and Health hazards from the associated project activity	Injuries to workers such as Occupational dermatitis, slips and fall of humans and objects, musculoskeletal disorders, etc.	Health and safety	ECO	• Equip workers with Personal Protective Equipment (PPE), provide trainings on how to effectively use the PPE. • Provide platforms for briefings and meetings about possible safety and health hazards in the work place • Provide site signs warning and informing about different hazards on site. • Safety signs during exploration phase should be put on site, no go areas should be labelled, PPE specifications should be clear to maintenance personnel.	**Throughout the exploration phase**

Impact	Description	Effects	Class	Responsibility	Action	Phase
Land use change	There will be change in land use and visual aesthetics	• The area will no longer be suitable for agriculture. • Sudden change in landscape appearances may be unfavourable to the conservatives.	• Social • Terrestrial environment	• Environmental Control Officer • Site Manager	• The area is to be rehabilitated after exploration activities in order to ensure that it is in state that is useful for the local community.	Throughout the exploration phase
Employment creation	The development provides an opportunity of outsourcing workers	• Improves disposable income to those employed and their immediate families.	Socio-economic	Site Manager	Work with local leadership (councillor) on acquiring non-skilled labour from the residents.	Throughout the exploration phase
Archeology and heritage	Accidental disturbance and destruction of archaeological or heritage objects and sites	• Accidental disturbance and destruction of archaeological or heritage objects and sites	Social	Site manager	A "No-Go-Area" should be put in place where there is evidence of archaeological site, historical, rock paintings, cave/rock shelter or past human dwellings. During the prospecting and exploration works, it is important to take note and recognize any objects that are	

Impact	Description	Effects	Class	Responsibility	Action	Phase
					discovered on and around project site. A chance of finding must always be employed.;	
Business linkages	Raw materials acquiring and contracting companies provide an opportunity for businesses.	• Local suppliers will be presented with an opportunity to empower their businesses. • Workers can be provided with accommodation, food and services from the local community increasing business activities.	Socioeconomic	Site Manager	The proponent will outsource most of its materials and services from surrounding areas in the region.	Throughout the exploration phase

Impact	Description	Effects	Class	Responsibility	Action	Phase
Potential mineral resource utilization	The development presents an opportunity for establishing the viability of the mining of graphite. This promotes enhanced knowledge in the area's economic resources and potential activities that may be undertaken in the area	• Development will facilitate economic growth and will also pave the way for future developers to grow interests in the area resulting in ripple effects and quick growth of the area.	Socioeconomic	Site Manager	Ensure exploration work is comprehensive and thorough in order to ensure as much information as possible is captured for planning purposes.	Throughout the exploration phase
Ongoing rehabilitation	drilling and digging trenches/pits on the target sites to get samples, thus they need to be rehabilitated	Disturbance and damage of the landscape	Environment	Site Manager	The stockpiled topsoil should be leveled soon after the completion of works at the sites. All drilled boreholes and excavated pits related to the project activities should be capped and backfilled, respectively. Remove project vehicles and equipment from the site and take to designated parking facility off-site.	Throughout the exploration phase and after exploration

Impact	Description	Effects	Class	Responsibility	Action	Phase
					All accumulated waste (hazardous, solid, and general) up until the cessation of exploration activities must be removed site and transported to designate off site waste management facilities.	

5. ENVIRONMENTAL MONITORING PLAN

Monitoring is very important for identifying the success of mitigation measures formulated for the significant impacts identified. Monitoring of activities will identify impacts that have not been foreseen and give enough time to analyse the situation and formulate measures to minimise impacts. Survey records and results must be maintained for these monitoring and inspections, highlighting any problems and the measures taken to address it.

The major elements of the environmental impact monitoring programme to be implemented during the all the project phases of the project are as follows:

- Site clearance to ensure that trees marked for protection are left untouched and that large areas of soil are not left exposed and uncovered for extended periods of time.
- Rehabilitation of disturbed areas and protection of any dangerous areas.
- Site drainage and surface runoff, especially during and shortly after major rainfall events, to ensure there is no flooding, ponding and runoff of surface water
- Compliance of exploration works with site and landscape plans.
- The contractor must immediately and completely clean up spills oil of materials and all machineries and vehicles must be equipped with drip trays to avoid oil spillage.
- Solid waste disposal practices to ensure appropriate on-site management and final disposal at approved dumping site.

6. CONCLUSION AND RECOMMENDATIONS

The renewals of the Environmental Clearance Certificate (ECC) of the proposed Exploration Activities on EPLs 7405, 7406 and 7407, near Otjozondu, in the Otjozondjupa Region is conducted in accordance to the Environmental Management Act 2007 and EMA Regulation 2012. Further consideration was given to relevant legislation throughout the entire process to ensure a successful assessment process.

Impacts likely to occur during project phases were assessed depicting a positive outlook despite limited details of the magnitude of the proposed development. Based on the assessment, the overall project is less damaging to the environment demonstrating improved economic development, high job creation opportunities and community development. Impacts with negative effects were also identified and summarized in a form of environmental management plan to ensure sustainable implementation.

It is important that the proponent observe and maintain accountability to both socio-economic and environmental sensitive activities from the project, such that the project is harmonized with policy, regulations, administrative frameworks and social interface with the public as proposed in the environmental management plan. Failure to observe these measures will significantly affect the local environment and lead to non-compliance. Therefore, implementation environmental protection measures should be executed in consultation with the key stakeholders.

Savannah Environmental Consulting Services cc hereby recommends that MET: DEA to renew the environmental clearance certificate for Exploration Activities on EPLs 7405, 7406, and 7407, under the condition of full implementation of the project's EMP.

APPENDIX 1: CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

Areas of proposed development activity are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such finds.

Scope: The "*chance finds*" procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The "chance finds" procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): "*a person who discovers any archaeological …. Object ……must as soon as practicable report the discovery to the Council*". The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Responsibility:

Operator: To exercise due caution if archaeological remains are found.

Foreman: To secure site and advise management timeously.

Superintendent: To determine safe working boundary and request inspection.

Archaeologist: To inspect, identify, advice management, and recover remains.

Procedure:

Action by person identifying archaeological or heritage material

a) If operating machinery or equipment stop work

b) Identify the site with flag tape

c) Determine GPS position if possible

d) Report findings to foreman

Action by foreman

a) Report findings, site location and actions taken to superintendent

b) Cease any works in immediate vicinity

Action by superintendent

a) Visit site and determine whether work can proceed without damage to findings

b) Determine and mark exclusion boundary

c) Site location and details to be added to project GIS for field confirmation by an archaeologist

Action by Archaeologist

a) Inspect site and confirm addition to project GIS

b) Advise NHC and request written permission to remove findings from work area

c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by archaeologist to confirm that remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.