

**EPL 9292 – Detailed Environmental Management Plan (Exploration EMP)**



**Environmental Management Plan (EMP)  
Exploration Activities - EPL 9292  
(16,651 ha) - Kunene Region, Namibia**

*Project Proponent: Profile Energy (Pty)  
Ltd*

<b>Document Title</b>	Environmental Management Plan (EMP) - EPL 9292
<b>Proponent</b>	Profile Energy (Pty) Ltd (subsidiary of Profile Investments Investment Holdings (Pty) Ltd)
<b>EPL</b>	EPL 9292
<b>Area</b>	16,651 ha
<b>General Location</b>	Kunene Region; west of Fransfontein; access via C35 corridor between Fransfontein and Kamanjab
<b>Document Version</b>	Version 1.0
<b>Date</b>	22 February 2026
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<b>Application Number</b>	250313005523

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## 1. Introduction

This Environmental Management Plan (EMP) sets out the management measures, operational controls, monitoring requirements and reporting responsibilities to ensure that exploration activities undertaken within **EPL 9292** are implemented in a manner that is environmentally responsible, socially acceptable, and compliant with Namibia's environmental permitting requirements and any conditions attached to the Environmental Clearance Certificate (ECC). The EMP is designed specifically for **mineral exploration and prospecting** activities and therefore focuses on temporary, low-footprint interventions and on preventing cumulative impacts that can arise through repeated exploration campaigns (e.g., track proliferation, pad expansion, unmanaged waste and erosion). The EMP applies to all project phases including pre-mobilisation planning, field operations (mapping, sampling, geophysics, trenching/pitting where authorised, and drilling where authorised), and progressive rehabilitation and closure.

## 2. EMP Purpose and Objectives

The purpose of the EPL 9292 EMP is to provide a clear, enforceable framework for environmental protection and management during exploration, ensuring that impacts are avoided where possible and reduced to acceptable residual levels through well-defined controls.

The EMP objectives are to:

- Maintain exploration within the assessed **reasonable activity envelope** and ensure change management where activities deviate materially.
- Prevent pollution and protect **groundwater and surface drainage features**, including avoiding contamination pathways associated with fuel handling, sanitation, drilling fluids/cuttings and waste.
- Minimise disturbance to **soils and vegetation** through footprint control and strict access management, and prevent erosion and sediment mobilisation during intense rainfall events.
- Manage **dust, noise and traffic safety** impacts on nearby receptors, land users and road users.
- Protect **heritage, archaeological and palaeontological resources** through mandatory chance-find procedures and avoidance.

- Prevent conflict with land users by enforcing land access agreements, gate/fence protocols, livestock disturbance controls, and an accessible grievance mechanism.
- Ensure progressive rehabilitation and verified close-out of disturbed areas to prevent cumulative degradation and the proliferation of informal tracks.
- Establish a monitoring and reporting system (registers, inspections, corrective actions) that demonstrates compliance with ECC conditions and supports adaptive management.

### 3. Scope and Applicability

#### 3.1 Project scope covered by this EMP

This EMP covers the exploration activities anticipated for EPL 9292, including:

- Desktop target generation and reconnaissance field mapping;
- Geochemical sampling (rock chips, soil/lag sampling, stream sediment sampling where applicable);
- Geophysical surveys (e.g., ground magnetics/gravity; potential EM/IP lines), with minimal vegetation clearing;
- Limited trenching/pitting where authorised and justified, including strict rehabilitation requirements;
- Exploration drilling (RC and/or diamond) at selected targets where authorised, including temporary drill pads, sumps (where needed), cuttings management and rehabilitation;
- Support logistics including temporary camps or day-trip operations, equipment laydown areas, fuel storage and refuelling, water carting, waste management, and site security.

#### 3.2 Explicit exclusions (unless separately authorised)

This EMP does **not** cover mining, bulk sampling at mining scale, permanent infrastructure, permanent waste facilities, ore processing plants, or any activity outside the ECC-approved exploration envelope. If the proponent intends to introduce any excluded activity, a formal change assessment and additional approvals will be required prior to implementation.

### 3.3 Geographic applicability

This EMP applies to all activities within the EPL 9292 licence boundary and to any associated access routes, temporary laydown areas, and support areas used to service activities within the EPL, including areas that may lie outside the boundary but are functionally required (e.g., public roads, authorised access tracks, and off-site waste disposal facilities).

## 4. Roles, Responsibilities and Competency

### 4.1 Purpose of this section

This section defines the environmental management governance structure for exploration on **EPL 9292 (16,651 ha)** and assigns clear roles, responsibilities, authority and competency requirements to ensure that all exploration activities are undertaken in compliance with the ECC conditions, the approved exploration activity envelope, this EMP, and all applicable Namibian legal requirements. The intent is to eliminate ambiguity by identifying who is accountable for: (i) planning and approvals prior to disturbance, (ii) implementation of controls on the ground, (iii) monitoring, inspection and reporting, (iv) corrective actions and incident response, and (v) closure and rehabilitation verification. These provisions apply to the Proponent and all contractors and subcontractors, including drilling and earthworks contractors.

### 4.2 Environmental management structure (governance and lines of accountability)

Exploration activities are typically executed through multiple teams (field mapping/sampling crews, geophysics crew, earthworks crew, drill contractor, logistics providers). Environmental performance depends on day-to-day operational decisions (routing, speed, refuelling practices, waste handling, siting of pads/camps) and therefore requires clear command lines and environmental oversight embedded into operations. The recommended structure for EPL 9292 is:

- **Proponent (Profile Energy / project management):** overall accountability and resourcing; ensures compliance with ECC and EMP; appoints competent contractors and the ECO; approves the exploration plan and activity envelope.
- **Environmental Control Officer (ECO):** independent or semi-independent site environmental oversight; conducts inspections, verifies compliance, maintains registers, issues corrective actions, and has authority to recommend suspension/stop-work where material risk or non-compliance occurs.
- **Exploration Manager / Site Supervisor:** day-to-day operational control; ensures field teams implement EMP requirements; approves daily work plans and ensures they align with permitted routes and sensitive-area exclusions.

- **Contractors (including drill contractor):** direct implementation of EMP controls within their scope; maintain equipment, manage wastes, prevent spills, rehabilitate disturbances, and comply with ECO/site supervisor instructions.
- **HSE Function (Proponent or Contractor):** ensures integration of environmental and safety controls (traffic safety, hazardous substances, emergency response) and that training/inductions are completed and documented.
- **Drivers / Equipment Operators:** frontline compliance with access rules, speed limits, refuelling controls, spill response readiness and reporting; immediate duty to stop and report environmental incidents.

This hierarchy must be reflected in appointment letters, contract clauses, site induction materials, and daily work planning.

## 4.3 Role definitions and detailed responsibilities

### 4.3.1 Proponent (Profile Energy / Project Owner)

**Accountability:** Ultimate accountability for environmental performance, ECC compliance, and ensuring adequate resources are available to implement the EMP.

**Key responsibilities include:**

#### 1. Regulatory compliance and authorisations

- Obtain and maintain the ECC and ensure all ECC conditions are communicated to staff and contractors.
- Ensure exploration remains within the **assessed activity envelope**; implement formal change-control for any scope escalation (e.g., additional drill sites, extended camps, trenching expansion).
- Secure land access permissions/agreements (commercial farms and/or communal authorities as applicable), including access routes, gate protocols, no-go areas and any timing restrictions.

#### 2. Appointments and resourcing

- Appoint a competent **Environmental Control Officer (ECO)** with clear authority and reporting lines.

- Appoint a competent Exploration Manager/Site Supervisor with responsibility for operational environmental compliance.
- Ensure contractors (geophysics, earthworks, drilling, logistics) are appointed with environmental obligations embedded in contracts, including penalties for non-compliance and obligations for rehabilitation and waste disposal.

### 3. Management systems and oversight

- Approve the EMP and ensure it is implemented, monitored and periodically reviewed.
- Provide resources for: spill kits, bunding, waste containment, signage, rehabilitation tools, and monitoring registers.
- Ensure stakeholder engagement continues during implementation (notifications of major activities, grievance management).

### 4. Reporting

- Ensure submission of required compliance reporting to the competent authority if required by ECC conditions.
- Maintain an incident escalation protocol and ensure timely reporting of notifiable incidents (spills, heritage finds, significant non-compliance).

#### 4.3.2 Environmental Control Officer (ECO)

**Accountability:** Environmental compliance verification and advisory support; independent oversight to identify and correct non-compliances before they become significant impacts or regulatory breaches.

#### **Key responsibilities include:**

##### 1. Compliance monitoring and inspections

- Conduct inspections at a frequency appropriate to activity intensity (e.g., during drilling, weekly or more; during low-intensity mapping/sampling, at least periodic planned inspections).

- Verify compliance with: approved routes, vegetation clearing limits, drainage buffers, waste housekeeping, fuel storage bunding, spill preparedness, sanitation controls, and rehabilitation measures.
- Verify that sensitive areas (drainages, waterpoints, heritage sites, sensitive vegetation) are respected and demarcated as no-go zones where required.

## **2. Registers and documentation**

- Maintain, review and sign off key environmental registers: route/disturbance register (GPS tracks, pads, trenches), waste manifest records, spill/incident register, grievance/complaints register, inspection checklists, and rehabilitation close-out forms.
- Ensure photo evidence is captured for: pre-disturbance conditions, active work sites, and rehabilitated sites.

## **3. Corrective actions and enforcement**

- Issue corrective action instructions to the Site Supervisor/Contractor for non-compliances, with defined timeframes for close-out.
- Verify close-out of corrective actions and escalate unresolved issues to Proponent management.

## **4. Incident and emergency response support**

- Support spill response and investigation, including root-cause analysis and prevention measures.
- Trigger and manage the environmental aspects of emergency response (containment, clean-up verification, disposal records).

## **5. Authority**

- The ECO must have written authority to require immediate corrective actions and to recommend stop-work where serious risk exists (e.g., refuelling near drainage lines without bunding, uncontrolled spill, trenching in no-go zone, unauthorised clearing).
- Where immediate environmental harm is imminent, the ECO may invoke stop-work directly (see Section 4.6).

### **4.3.3 Exploration Manager / Site Supervisor (Proponent Representative)**

**Accountability:** Day-to-day implementation of the EMP and ensuring that all crews (including contractors) operate within the authorised footprint and controls.

**Key responsibilities include:**

- Prepare daily/weekly work plans showing proposed routes, work sites and activities; confirm alignment with ECC/EMP restrictions and landowner agreements.
- Ensure all staff and contractors complete induction and remain compliant (toolbox talks; refreshers after incidents).
- Ensure demarcation of work sites, approved tracks and exclusion zones (drainage buffers, waterpoints, heritage buffers where applicable).
- Ensure availability and readiness of environmental equipment: spill kits, drip trays, bunds, waste bins, sanitation, fire extinguishers.
- Coordinate with the ECO on inspections, corrective actions, and rehabilitation close-out.
- Ensure rehabilitation is implemented progressively and verified before demobilisation from a site.
- Maintain communication with landowners/occupiers and ensure grievances are addressed through the formal mechanism.

### **4.3.4 HSE Officer / HSE Function (Proponent or Contractor)**

**Accountability:** Integration of environmental controls with occupational health and safety and community health and safety, ensuring that high-risk activities are properly planned and managed.

**Key responsibilities include:**

- Ensure all high-risk activities (refuelling, fuel storage, drilling, trenching, lifting operations, working near traffic) have method statements and that environmental controls are embedded within them.
- Ensure driver safety and roadworthiness checks (speed management, fatigue management, vehicle inspections).

- Ensure emergency preparedness: spill response plan, fire response, first aid provisions, communication plan, and evacuation procedures.
- Ensure incident reporting systems capture environmental incidents as well as safety incidents, and that lessons learned are communicated.

#### **4.3.5 Contractors (General – mapping/geophysics/earthworks/logistics)**

**Accountability:** Full compliance with the EMP within their scope of work; implementation of controls is a contractual obligation.

**Key responsibilities include:**

- Operate only within approved work areas and routes; do not establish new tracks without written approval.
- Apply best practice housekeeping: waste segregation, secure storage, removal to licensed facilities; maintain waste records.
- Manage fuels and hazardous substances responsibly: bunding, drip trays, controlled refuelling, spill kits and immediate incident reporting.
- Maintain equipment to minimise dust, noise, leaks and unnecessary disturbance.
- Implement progressive rehabilitation of disturbances created by the contractor (pads, trenches, lines), including re-contouring and stabilisation measures where required.
- Provide competent personnel and ensure all staff attend induction and comply with site rules.

#### **4.3.6 Drill Contractor (RC/Diamond Drilling Contractor)**

**Accountability:** Highest-risk contractor from an environmental perspective due to potential for spills, cuttings/fluids management issues, noise, and localised footprint disturbance.

**Key responsibilities include:**

**1. Pre-mobilisation**

- Submit drill method statement incorporating: pad design, sumps (if required), cuttings containment, fuel handling, refuelling plan, waste management and rehabilitation plan.

- Provide evidence of equipment maintenance and leak prevention (hoses, fittings, bunding systems).

## **2. Drill site establishment and operations**

- Construct pads only in approved locations; minimise clearing; avoid drainages and sensitive habitats.
- Manage drilling fluids and cuttings: keep contained, prevent discharge to land or drainage lines; implement lined sumps where required by conditions and site sensitivity.
- Maintain bunded storage for fuel and oils; refuel only in designated controlled areas using drip trays; ensure spill kits are present at rigs and refuelling points.
- Control noise and light: maintain silencers; implement daylight drilling where practicable and agreed with land users; manage generator placement.

## **3. Decommissioning and rehabilitation**

- Plug/secure drill holes as required; backfill and stabilise any sumps; remove all waste and materials; re-contour and rip compacted surfaces; close access spurs and implement erosion controls.
- Provide close-out documentation (photos, coordinates, waste disposal records) for each drill site.



#### **4.3.7 Drivers and Equipment Operators (including subcontracted drivers)**

**Accountability:** Frontline compliance; drivers and operators are the most common cause of cumulative impacts (track proliferation, dust, wildlife collisions) and spill incidents if not managed.

**Key responsibilities include:**

- Comply with approved routes and strictly avoid off-road driving.
- Observe site speed limits and safe driving practices; avoid night driving where practicable; maintain convoy communications where used.
- Report erosion risk areas, damaged culverts/crossings, or unsafe conditions to the Site Supervisor.
- Refuel only at approved locations using drip trays; immediately report any leaks/spills.

- Carry required equipment: spill kit (where applicable), fire extinguisher, first aid kit, and communications device.
- Respect landowner rules: gates as found, no disturbance to livestock, no unauthorised access.

#### 4.4 Competency requirements (minimum standards)

To ensure effective implementation, the following minimum competency requirements apply:

##### 1. **ECO**

- Proven experience in Namibian EIA/EMP implementation and ECC compliance for exploration or similar field-based projects.
- Demonstrable knowledge of erosion control, spill response, waste management, rehabilitation and heritage chance-find management.
- Competent in record keeping and reporting (registers, inspections, corrective action tracking).
- Authority and independence to enforce compliance and escalate non-compliance.

##### 2. **Exploration Manager / Site Supervisor**

- Demonstrated experience managing exploration field operations in Namibia.
- Familiarity with ECC conditions, land access protocols and stakeholder engagement requirements.
- Ability to implement and enforce route control, demarcation, and rehabilitation requirements.

##### 3. **HSE function**

- Competent in risk assessment, incident reporting, emergency response planning, and contractor management.
- Familiar with hazardous substances handling and transport requirements for field contexts.

##### 4. **Contractors and drill contractor**

- Competent supervisors onsite who understand EMP requirements and can implement controls.
- Operators licensed/competent for machinery used (drill rigs, excavators, forklifts) and trained in spill response and waste management.
- Demonstrated capacity to rehabilitate disturbances and remove wastes properly (equipment and logistics).

## 5. Drivers

- Valid driving licences and proven experience on gravel roads and remote-area driving.
- Induction completed and signed; awareness of livestock/wildlife driving risks and emergency procedures.

### 4.5 Training, induction and toolbox talks (competency assurance)

All personnel entering the EPL for project work must complete a **site induction** that includes, at minimum: route discipline and no-off-road rule; drainage and waterpoint avoidance; waste and sanitation requirements; fuel handling and spill response; speed limits and road safety; wildlife and livestock considerations; heritage chance-find and stop-work; grievance mechanism; incident reporting; and disciplinary consequences for non-compliance. Refresher toolbox talks must be held at least weekly during active phases and after any incident or non-compliance event. Training records must be retained in the project file.

### 4.6 Stop-work authority and escalation protocol

Because exploration impacts can occur rapidly (e.g., refuelling spill near a drainage line, trenching in a no-go zone, uncontrolled off-road driving, heritage find disturbance), the EMP establishes clear stop-work authority:

#### **Who can issue a stop-work instruction:**

- **ECO** (immediate stop-work where imminent environmental harm or serious non-compliance is observed).
- **Exploration Manager/Site Supervisor** (stop-work for unsafe/non-compliant practices or where conditions require).
- **HSE Officer** (stop-work for combined safety/environmental risk situations).

- **Any employee or contractor** has the right and duty to **stop the task** and report immediately if they observe an imminent risk of significant environmental harm (e.g., active spill, refuelling without bunding, disturbance of a grave/artefact, driving into a drainage line, uncontrolled erosion initiation).

#### **Stop-work triggers (minimum):**

- Any fuel/chemical spill that is not immediately contained.
- Refuelling or fuel storage occurring outside controlled/bunded arrangements.
- Works occurring inside no-go zones (drainage buffers, protected/sensitive areas, known heritage areas).
- Discovery of suspected heritage artefacts, graves, or fossils (chance-find trigger).
- Severe erosion initiation (active gulying) requiring immediate stabilisation.
- Repeated speeding/off-road driving incidents.
- Any condition where continued operation is likely to cause material environmental damage or breach ECC conditions.

#### **Escalation and restart conditions:**

1. **Stop** the activity immediately and secure the area.
2. **Notify** the Site Supervisor and ECO (and HSE where relevant).
3. **Assess** the incident/non-compliance: cause, extent, immediate controls.
4. **Implement corrective actions** (containment/clean-up/rehab; disciplinary measures; re-induction).
5. **Document** the event in the relevant register (incident/spill, non-compliance, heritage find, grievance).
6. **Restart** only once the ECO and Site Supervisor confirm that: (i) the cause has been addressed, (ii) the area is stabilised/secured, and (iii) additional controls are in place to prevent recurrence.

#### **4.7 Responsibility matrix (summary of accountability)**

To support clarity, responsibilities may be summarised as follows:

- **Compliance with ECC/EMP:** Proponent (accountable), Site Supervisor (responsible), Contractors (responsible), ECO (verification).
- **Route control and demarcation:** Site Supervisor (responsible), Drivers/Contractors (implementation), ECO (verification).
- **Spill prevention and response:** Contractors/Drill contractor (responsible), HSE (support), Site Supervisor (oversight), ECO (verification).
- **Waste management:** Contractors (responsible), Site Supervisor (oversight), ECO (verification).
- **Rehabilitation close-out:** Contractor/Drill contractor (responsible), Site Supervisor (oversight), ECO (sign-off recommendation), Proponent (accountable).
- **Stakeholder engagement and grievances:** Proponent/Site Supervisor (responsible), ECO (support/record verification).

## 5. Induction, Training, Communication, Documentation and Management of Change

### 5.1 Purpose of this section

This section establishes the procedures and minimum requirements for (i) induction and training of all personnel and contractors working on **EPL 9292**, (ii) internal and external communication to maintain compliance, transparency and social licence, (iii) documentation and recordkeeping necessary to demonstrate ECC compliance, and (iv) formal Management of Change (MoC) controls to ensure that any deviation from the ECC-approved exploration envelope and EMP commitments is assessed and authorised before implementation. These measures are designed to prevent the most common causes of exploration non-compliance in Namibia—namely uncontrolled access/track proliferation, poor waste and spill management, inadequate rehabilitation, and insufficient evidence trails for ECC audits.

### 5.2 Induction (site entry requirements)

#### 5.2.1 Induction policy and applicability

No person may commence work on EPL 9292 (including short-duration visits) unless they have completed a **site environmental and HSE induction** appropriate to their role. This applies to:

- Proponent staff and visitors;
- All contractors and subcontractors (including drilling and earthworks contractors);
- Drivers and logistics providers;
- Specialists or auditors conducting field verification.

Induction completion must be documented and filed before site access is granted. A refresher induction is required when: (i) a person has been offsite for more than 30 days during active operations; (ii) there has been a significant incident; (iii) the EMP is updated; or (iv) MoC introduces new activities or hazards.

#### 5.2.2 Induction content (minimum)

The induction must cover, at minimum, the following topics in a practical, field-operational manner:

## 1. **Regulatory context and commitments**

- ECC purpose and obligations; consequence of non-compliance.
- Boundaries of EPL 9292 and the **approved exploration activity envelope**.
- Explicit exclusions (mining, bulk sampling at mining scale, permanent infrastructure, processing, permanent waste facilities).

## 2. **Footprint and access control**

- Approved routes, no-go areas and buffer zones (drainages, waterpoints, sensitive habitats).
- Prohibition of off-road driving and “track multiplication”.
- Gate and fence protocol (leave gates as found; no fence cutting; report and repair damage).

## 3. **Soils, erosion and stormwater**

- Avoidance of steep slopes and drainage corridors for pads/track formation.
- Basic erosion prevention practices; post-storm inspections and reporting.

## 4. **Water resource protection**

- No discharge into watercourses; protection of waterpoints.
- Drill cuttings/fluids management requirements (if drilling occurs).
- Sanitation requirements (no open defecation; managed toilets; greywater controls).

## 5. **Fuel, hazardous substances and spill response**

- Bunding requirements ( $\geq 110\%$  capacity); refuelling rules; drip trays.
- Spill kit contents, deployment steps, reporting timelines, and incident escalation.
- Prohibited practices (refuelling in drainages; unattended fuel containers).

## 6. **Waste management and housekeeping**

- Zero-litter rule; segregation and secure storage; removal to authorised facilities.

- Hazardous waste handling and documentation.

#### 7. **Air quality, dust, noise and traffic safety**

- Speed limits; dust minimisation measures; safe driving and wildlife/livestock awareness.
- Working-hour restrictions and nuisance prevention near receptors.

#### 8. **Biodiversity and fauna interactions**

- No harassment/feeding; wildlife collision avoidance; sensitive habitat avoidance.
- Invasive species prevention measures.

#### 9. **Heritage and chance finds**

- Stop-work triggers for artefacts/graves/fossils; protection of the find; reporting chain.

#### 10. **Community health & safety and grievance mechanism**

- Respectful behaviour on farms/communal land; interaction protocol.
- How to receive and record complaints; escalation and close-out expectations.

#### 11. **Emergency preparedness**

- Fire response, medical response, communication protocols, evacuation routes, and emergency contacts.

#### **5.2.3 Induction delivery and verification**

- Induction must be delivered by the Site Supervisor and/or ECO/HSE representative.
- Induction must include **map-based briefing** showing approved routes, sensitive areas and no-go buffers.
- Inductees must sign an **Induction Register** acknowledging understanding and commitment to comply.
- A short competency check (verbal Q&A or checklist) should confirm comprehension of high-risk topics (spill response, route discipline, chance finds).

## 5.3 Training and competency development

### 5.3.1 Training objectives

Training ensures that personnel have the practical skills to implement EMP controls consistently, not merely understand them in principle. The objectives are to:

- Prevent predictable incidents (spills, off-road driving, unmanaged waste, erosion);
- Embed consistent standards across contractors;
- Provide an auditable record of competency and due diligence.

### 5.3.2 Training programme (minimum)

The following training elements must be implemented:

#### 1. Toolbox talks (operational refreshers)

- Frequency: at least **weekly** during active operations; **daily** during high-risk activities (drilling mobilisation, trenching, fuel transfers).
- Content: one focused topic per session (e.g., “refuelling protocol”, “drainage buffers”, “drill cuttings containment”, “gate etiquette”, “post-storm erosion checks”).

#### 2. Task-specific training

- **Spill response practical drills:** at least once per campaign, and after any spill.
- **Waste segregation and hazardous waste handling:** for camp/logistics crews.
- **Driver safety and environmental driving:** speed, dust, wildlife/livestock, route discipline, night driving restrictions.
- **Rehabilitation training:** ripping/scarifying, re-contouring, stabilisation measures, closure of spurs, photo documentation.

#### 3. Contractor supervisor training

- Ensure supervisors can enforce EMP controls, keep registers, and implement corrective actions.

- Ensure drill contractor supervisors understand containment, bunding, sump management and close-out requirements.

### 5.3.3 Training records

Training must be recorded in a **Training Register** capturing:

- Date, topic, trainer, attendees, and signatures;
- Location/campaign reference;
- Any competency observations and corrective follow-up actions.

## 5.4 Communication (internal and external)

### 5.4.1 Internal communication (site governance)

Effective internal communication is essential to prevent non-compliance caused by poor coordination (e.g., teams using unapproved routes, refuelling without bunding, trenching too close to drainages). Minimum internal communication measures include:

- **Daily pre-start briefings** led by the Site Supervisor:
  - Planned activities for the day, locations, routes, and sensitive-area reminders.
  - Weather considerations (wind/dust; rainfall risk; road condition constraints).
  - Safety and environmental risks and controls for the day.
- **Weekly environmental coordination meetings** (or combined HSE meetings):
  - Review inspection findings, incidents, grievances/complaints, rehabilitation progress.
  - Assign corrective actions with deadlines and responsible persons.
  - Confirm upcoming high-risk activities and resource needs (spill kits, bunds, waste removal).
- **Communication channels**
  - Maintain a clear chain for reporting incidents and non-compliance (drivers → supervisor → ECO/HSE → proponent management).

- Use WhatsApp/radio/phone as appropriate for remote field settings, but ensure that key decisions are formally recorded in logs.

#### **5.4.2 External communication (stakeholders and authorities)**

External communication must maintain transparency and social licence and should be aligned with the Public Participation Plan and land access agreements.

Minimum measures include:

- **Landowner/occupier notifications** prior to mobilisation, drilling, trenching, or any activity likely to increase traffic/noise/dust.
- **Point-of-contact:** a dedicated project contact number/email for enquiries and complaints.
- **Grievance mechanism:** ensure stakeholders know how to submit complaints and how they will be addressed.
- **Authority communication:** notify the competent authority of reportable incidents if required by ECC conditions, and maintain records of such notifications.

### **5.5 Documentation and recordkeeping (ECC compliance evidence)**

#### **5.5.1 Document control principle**

All EMP-related documents, registers and evidence must be controlled such that they are:

- Current and accessible (latest version in use);
- Traceable (who created/approved/changed the document and when);
- Auditable (evidence can be produced for ECC inspections or complaints investigations).

A Document Controller role may be assigned to the Site Supervisor or an appointed administrator, with oversight by the Proponent.

#### **5.5.2 Core documents to be available on site (minimum)**

The following documents must be accessible at camp/site office and in digital form:

- ECC and any attached conditions;
- EMP (current version) and method statements;

- Approved route maps and no-go/sensitive area maps;
- Land access agreements and gate/fence protocols;
- Emergency response plan and contact list;
- Contractor environmental clauses and proof of inductions.

### **5.5.3 Mandatory registers and forms (minimum set)**

The following registers must be maintained and available for audit:

1. **Induction Register** (all personnel and contractors).
2. **Training Register** (toolbox talks, spill drills, task training).
3. **Inspection Checklist Log** (ECO and Site Supervisor inspections).
4. **Route & Disturbance Register** (GPS tracks, new spurs, drill pads, trenches; with dates and rehabilitation status).
5. **Waste Register and Disposal Records** (including manifests/receipts for authorised disposal).
6. **Hazardous Substances Register** (fuels, oils, chemicals; storage locations; bunding verification).
7. **Spill/Incident Register** (spill details, containment actions, volumes, disposal, close-out evidence).
8. **Rehabilitation Close-out Forms** (per pad/trench/line/spur; before/after photos).
9. **Complaints and Grievance Register** (issue, complainant if provided, response, corrective action, close-out).
10. **Heritage Chance-Find Register** (trigger, location, action taken, authority notification, outcome).

Each register should be standardised with minimum fields and should be backed up electronically.

### **5.5.4 Evidence standards (minimum)**

For each relevant activity, the EMP requires evidence sufficient to demonstrate compliance:

- **Photo evidence:** geo-tagged where possible; before–during–after.
- **GPS evidence:** track logs and pad coordinates for footprint control.
- **Receipts/manifests:** for waste disposal and any contaminated material disposal.
- **Signed forms:** inductions, training attendance, inspection sign-offs, rehabilitation sign-offs.

## 5.6 Management of Change (MoC)

### 5.6.1 MoC principle and triggers

Exploration programmes evolve. However, environmental authorisation and stakeholder agreements are based on a defined scope. Management of Change ensures that any material change is assessed before execution to prevent unauthorised impacts and ECC non-compliance.

MoC must be initiated when any of the following occur (non-exhaustive):

- Introduction of **new activity types** not assessed in the current EMP (e.g., trenching where previously not planned; increased drilling intensity; new camp type).
- Significant **increase in intensity or footprint** (e.g., additional drill pads, multiple new access spurs, expanded laydown areas).
- Changes to **locations** that may affect sensitive receptors (moving activities closer to drainages, waterpoints, settlements, or heritage-sensitive areas).
- Changes to **materials/hazardous substances** (new chemicals, increased fuel storage volumes).
- Changes to **water sourcing** (new abstraction point, new borehole drilling, or significant increase in water demand).
- Changes to **schedule** that introduce new risks (night operations, wet-season mobilisation).
- Any new information from stakeholders or field verification that indicates higher sensitivity than assumed.

### 5.6.2 MoC process (step-by-step)

The MoC process must follow these steps:

**1. Change identification**

- Proposed change is described by the Site Supervisor/Contractor (what, why, where, when, duration, footprint).

**2. Preliminary screening**

- ECO and Site Supervisor screen whether the change is within the approved envelope or constitutes a material deviation.
- Confirm whether landowner permissions are affected (new routes/areas).

**3. Risk and impact review**

- Identify incremental risks (drainage proximity, erosion, groundwater risk, biodiversity/heritage sensitivity, nuisance to receptors).
- Update mitigation measures and monitoring requirements accordingly.

**4. Approval decision**

- If the change is minor and within envelope: approve internally (Proponent + ECO sign-off) and update method statements.
- If the change is material: escalate to Proponent management and determine whether **amended ECC approval / additional assessment** is required prior to implementation.

**5. Implementation controls**

- Update route maps, no-go buffers, training and inductions as needed.
- Communicate the change to all affected teams via toolbox talk and written instruction.

**6. Documentation**

- Record the change in an MoC Register (change description, risk assessment summary, approvals, dates, updated documents, training evidence).

**7. Verification**

- ECO verifies implementation and effectiveness of additional controls during inspections.

### **5.6.3 MoC documentation (MoC Register minimum fields)**

- Unique change ID; date raised; raised by; description; location; footprint estimate; duration; reason for change; risk screening outcome; required additional controls; landowner permission status; approvals (names/signatures); date implemented; verification date; close-out notes.

## **5.7 Non-compliance, corrective action and continuous improvement (link to MoC)**

All non-compliances, incidents, and repeated complaints must trigger review of whether the EMP requires improvement. The Site Supervisor and ECO must:

- Record the event in the relevant register;
- Implement immediate corrective action;
- Conduct root-cause analysis for repeated events;
- Update method statements or controls where needed via the MoC procedure;
- Re-induct or retrain personnel where behavioural causes are identified.

## 6.1 Footprint and Access Control

### 6.1.1 Objective and performance standard

Footprint and access control is the primary mitigation for exploration on **EPL 9292** and is designed to prevent the most common and cumulative exploration impact: **uncontrolled track proliferation and progressive expansion of disturbed area**. The objective is to ensure that all vehicles, crews and equipment operate strictly within **approved routes and work sites**, that sensitive features (drainages, waterpoints and other no-go areas) are avoided, and that any temporary disturbance created is rehabilitated promptly and verifiably. The performance standard is: **no off-road driving, no unauthorised new tracks, minimum necessary clearing widths**, and a **fully auditable disturbance record** (GPS + photos) demonstrating that the exploration programme remains within the assessed activity envelope and ECC conditions.

### 6.1.2 Applicability

This method statement applies to all phases and activities, including:

- reconnaissance mapping, sampling and geophysics;
- mobilisation and demobilisation of crews and equipment;
- trenching/pitting and drilling (if authorised);
- temporary camps, laydown areas, refuelling points and water carting.

It applies to all vehicles (light vehicles, bakkies, trucks, water bowsers, drill rigs, excavators) and all contractors/subcontractors.

### 6.1.3 Route approval system

#### (a) Route hierarchy and principles

Routes and access are managed under a hierarchy to minimise new disturbance:

1. **Public roads** (primary access): use existing public roads to access the general area.
2. **Existing internal tracks** (preferred): use existing farm/communal tracks and previously disturbed routes within the EPL where permission is granted.
3. **Temporary authorised access spurs** (last resort): only established when no practicable existing route exists and only after formal approval and environmental screening.

## Core principles:

- Use the **shortest practical route** that avoids sensitive features.
- Do not create parallel tracks to avoid corrugations; manage driving behaviour instead.
- Keep turning circles and parking areas within demarcated footprints.
- Apply “**one route in, one route out**” where feasible to prevent braided track networks.

## (b) Route planning and approval steps

No new route or access spur may be used until the following steps are completed:

### 1. **Proposed route identification**

The Site Supervisor identifies a proposed route based on operational need, landowner permissions and map-based constraints (drainage lines, waterpoints, steep slopes, sensitive areas).

### 2. **Environmental screening by ECO/Site Supervisor**

The ECO screens the proposed route against sensitivity criteria, including:

- proximity to drainage lines/ephemeral channels and flood-prone flats;
- proximity to waterpoints, wells/boreholes and associated infrastructure;
- steep slopes or erosion-prone soils;
- sensitive vegetation areas (if identified) and riparian/rangeland condition;
- known heritage-sensitive zones or areas with potential for graves/artefacts.

### 3. **Land access confirmation**

Confirm permission to use the route (commercial farm owner/occupier and/or communal authority). This includes confirmation of gate locations, restrictions, timing and livestock considerations.

### 4. **Route demarcation and communication**

Once approved, the route is:

- recorded on the **Route Map** (hard copy + digital);
- communicated in daily pre-start briefings and toolbox talks;

- demarcated on the ground where needed (e.g., flagging at junctions, signage near sensitive features).

## 5. Entry into Route & Disturbance Register

The approved route is assigned a unique ID and entered into the Route & Disturbance Register, including the reason for the spur (if new), start/end coordinates, and rehabilitation/closure requirements.

### (c) Prohibited access behaviours

The following actions are strictly prohibited and constitute non-compliance:

- **Off-road driving** outside approved routes (except true emergencies affecting safety, which must be documented and reported).
- Creating **parallel tracks** or bypasses around corrugations, puddles or vegetation.
- Driving through **drainage channels**, riparian zones, or wet areas unless at a pre-approved crossing.
- Driving or parking within **buffer zones** (see 6.1.5).
- Unauthorised widening of tracks or clearing beyond the defined width limits.

## 6.1.4 GPS tracking and disturbance recording (auditable footprint control)

### (a) Minimum GPS requirements

To ensure traceability and prevent cumulative impacts, GPS evidence is mandatory as follows:

- **Daily GPS track logs** must be recorded for at least one lead vehicle per field team (mapping/sampling/geophysics), and for all drilling and earthworks support vehicles where feasible.
- If available, use vehicle tracking apps or GPS units with exportable formats (GPX/KML).
- Drill pads, trenches, new spurs, laydown areas, camps, refuelling points and waste storage areas must be captured as **point coordinates and/or polygons**.

### (b) Disturbance Register content (minimum)

Each disturbance entry must include:

- Unique ID (route/pad/trench/camp etc.);
- Date opened; activity type; responsible contractor/team;
- Coordinates (start/end for routes; centroid for pads; polygon where available);
- Estimated footprint (m<sup>2</sup> or ha) and clearing width (m);
- Photos: before, during, after (geo-tagged where possible);
- Rehabilitation status and close-out date;
- ECO verification notes/sign-off recommendation.

### **(c) Reporting and review**

- GPS tracks and the disturbance register must be reviewed **weekly during active operations** by the Site Supervisor and ECO to identify any drift from approved routes and to confirm that closure rehabilitation is progressing.
- If repeated deviations occur, corrective actions must include re-induction, disciplinary measures, and closure/rehabilitation of unauthorised tracks.

## **6.1.5 Buffers and no-go areas (drainage lines and waterpoints)**

### **(a) Drainage-line buffers**

Given the erosion and sediment delivery risks associated with ephemeral drainage systems in the EPL, drainage features must be treated as high-sensitivity receptors.

#### **Minimum requirements (scoping-level default):**

- No siting of camps, fuel storage, refuelling points, waste areas, drill pads, sumps, or laydown areas within **50 m** of any mapped drainage line or obvious ephemeral channel.
- No new tracks within **30 m** of drainage lines unless unavoidable; where unavoidable, the route must be specifically approved, designed to follow stable ground, and include erosion control measures.

- Crossings of channels may only occur at **existing crossings** or at specifically approved crossing points. Crossing approaches must be stabilised to prevent rutting and bank erosion.

**Field refinement:** Where drainage lines are wider/more incised, where evidence of flood damage exists, or where soils are particularly erodible, the ECO may require larger buffers based on site conditions.

### **(b) Waterpoint buffers**

Waterpoints are critical livelihood assets and must be protected from disturbance, dust, spills and access conflicts.

#### **Minimum requirements:**

- No refuelling, fuel storage, chemical storage, washing, waste storage, or sanitation facilities within **100 m** of any borehole, well, water trough, windpump, tank, or other waterpoint infrastructure.
- No drilling pad, camp, laydown area, or trenching within **100 m** of waterpoints unless justified and approved with landowner consent and additional controls.
- Vehicles must not park or idle near waterpoints unless required for authorised access, and must not obstruct livestock movement.
- Access routes must avoid waterpoints wherever possible; if a route passes nearby, enforce speed limits and dust suppression measures where feasible.

### **(c) Additional no-go areas**

The following must be treated as no-go unless specifically authorised:

- known graves, cemeteries, cultural sites, or heritage features (with buffers established once identified);
- riparian vegetation corridors and wet patches (especially after rainfall);
- any areas explicitly restricted in land access agreements (e.g., sensitive grazing camps, calving areas).

## 6.1.6 Gate and fence procedure (mandatory land-user protocol)

### (a) Purpose

In pastoral landscapes, gates and fences are key management infrastructure. Improper gate handling can cause livestock loss, conflict and safety risks. This procedure applies to all project personnel.

### (b) Rules of conduct

1. **Leave gates as found:**

- If open, leave open. If closed, close behind you.

2. **No fence cutting or forced entry:**

- If access is blocked, stop and contact the Site Supervisor for guidance.

3. **Use designated gates and crossings only:**

- Do not create new openings in fences or drive around gates.

4. **Report damage immediately:**

- Any fence/gate damage must be reported to the Site Supervisor the same day and recorded in the Incident Register.

5. **Repair and make good:**

- The proponent/contractor is responsible for immediate temporary repair and permanent repair as soon as practicable, in consultation with the landowner/occupier.

6. **Livestock right-of-way:**

- Vehicles must stop for livestock and herders, avoid hooting/harassing, and maintain safe distances.

### (c) Gate/fence log

A Gate & Fence Log must record:

- location of gates used (description/coordinates);
- incidents/damage (nature, cause, repair actions, close-out);

- landowner communication and confirmation.

### 6.1.7 Demarcation and on-site controls

To make footprint discipline practical in the field, the following controls apply:

- **Work site demarcation:** pads, trenches, laydown areas and camps must be clearly demarcated (flagging tape, pegs, cones) prior to disturbance.
- **Clearing width limits:** any unavoidable line clearing must be the minimum required for safe passage and equipment operation (target  $\leq 3\text{--}4$  m for light vehicle tracks; wider only where engineering justification exists for drill rigs and only within the approved footprint).
- **Signage:** install basic signage at camps and key junctions (speed limits, “No off-road driving”, spill response, waste rules).
- **Pre-start checks:** daily briefings must confirm which routes are approved and which areas are excluded.

### 6.1.8 Non-compliance and corrective actions

Non-compliance with access controls is treated as a high-risk issue because it drives cumulative impacts and stakeholder conflict. The following graduated response applies:

- **First incident (minor deviation):** immediate correction, documented warning, refresher toolbox talk.
- **Repeated deviations or significant breach (off-road driving, new track creation, entering buffer/no-go zones):** stop-work for the individual/team, formal incident report, disciplinary action, immediate rehabilitation of unauthorised tracks, and review via Management of Change (MoC) if route needs are legitimate.
- **Severe breach with environmental harm (e.g., rutting in drainage line, damage to waterpoint, fence cutting):** stop-work, notification to landowner, corrective action plan with ECO oversight, potential removal of contractor from site.

### 6.1.9 Mini monitoring table: Footprint & Access Control

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Approved route system and no off-road driving	% operations on approved routes; number of route deviations	GPS track review; ECO inspections; driver interviews	Site Supervisor; ECO	Weekly during active operations (daily during drilling/earthworks)	GPS (GPX/KML), route maps, inspection checklists
No unauthorised new tracks or parallel tracks	Count of unauthorised spurs/parallel tracks	Field inspection; compare tracks to approved map	ECO; Contractor supervisors	Weekly; after heavy rainfall	Inspection logs; photos; corrective action forms
Drainage buffers enforced	No works/parking within buffer; authorised crossings only	Site walkover; pad/route coordinates vs drainage map	Site Supervisor; ECO	Pre-disturbance approval + weekly checks	Disturbance register; site photos; signed approvals
Waterpoint buffers enforced	No refuelling/waste within 100 m; no obstruction to livestock	Field inspection; landowner feedback	Site Supervisor; ECO	Weekly; after refuelling events	Inspection logs; stakeholder log; incident register
Gate and fence procedure compliance	Number of gate/fence incidents; closure/repair time	Incident reporting; gate/fence log; landowner confirmation	Drivers; Site Supervisor	Continuous; reviewed weekly	Gate & Fence Log; incident register; repair photos
Disturbance mapping and close-out	% disturbances with coordinates, photos, and rehab sign-off	Register audit and verification	ECO; Site Supervisor	Weekly; at demobilisation	Disturbance register; rehab forms; before/after photos

## 6.2 Vegetation Clearing and Invasive Species

### 6.2.1 Objective and performance standard

The objective of this method statement is to minimise vegetation disturbance during exploration on **EPL 9292** by ensuring that clearing is avoided wherever practicable, kept to the **absolute minimum footprint** where unavoidable, and fully rehabilitated progressively to prevent long-term habitat degradation and cumulative impacts. A parallel objective is to prevent the introduction and spread of **invasive alien plant species (IAS)** and problem plants along disturbance corridors (tracks, camps, drill pads, trenches), which is a common secondary impact of exploration activities in semi-arid rangelands.

#### **Performance standard:**

- **Avoid clearing** wherever practicable; use existing tracks and natural openings first.
- Where clearing is unavoidable, it must be **pre-approved, minimised, and demarcated**, with no clearing beyond the approved width and no clearing in sensitive areas (especially drainage/riparian zones).
- **No introduction or spread of invasive plants** attributable to the project; any IAS detected is treated promptly (early detection and rapid response).
- Progressive rehabilitation restores surface stability and reduces disturbed corridors that facilitate invasives.

### 6.2.2 Applicability

This method statement applies to all exploration activities that may disturb vegetation, including:

- movement along tracks and any widening for access;
- geophysical line cutting (if required);
- establishment of temporary camps and laydown areas;
- trenching/pitting (if authorised);
- drilling pads and associated working areas (if authorised);
- any temporary soil stockpiles, sumps or disturbed surfaces.

It applies to proponent staff, all contractors/subcontractors, and all equipment operators.

### 6.2.3 Mini monitoring table: Vegetation Clearing & Invasive Species

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Clearing avoidance and micro-siting	% activities using existing tracks/clearings; number of new clearings required	Work plan review; route/pad approvals	Site Supervisor; ECO	Pre-disturbance + weekly review	Approved work plans; route maps; MoC records
Clearing limited to approved footprint	Clearing widths within approved limits; no damage outside demarcation	Field inspections; spot measurements; photo verification	ECO; Contractor supervisor	Weekly during active clearing; after mobilisation	Inspection logs; photos; Disturbance Register
No clearing in drainage buffers and riparian zones	Zero instances of clearing within drainage buffers	Inspection; GPS overlay of disturbance vs drainage map	ECO; Site Supervisor	Pre-disturbance approval + weekly	GPS/GIS evidence; sign-off forms
No clearing within waterpoint buffer; protect waterpoints	No vegetation disturbance around waterpoints beyond approved access	Inspection; landowner feedback	Site Supervisor; ECO	Weekly; during high-traffic periods	Inspection logs; stakeholder log
Vehicle hygiene / IAS prevention	% incoming machinery inspected/cleaned; no imported soil without approval	Visual checks; source documentation	Contractor; Site Supervisor	At mobilisation; monthly checks	Equipment inspection checklist; source records
IAS early detection and rapid response	Number of IAS sightings; time to treatment; no seed set	IAS inspections; photo/GPS record; follow-up check	ECO; Site Supervisor	Weekly during growing season; after rains	IAS Register; treatment notes; photos

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Rehabilitation supports vegetation recovery and prevents re-use	Closed spurs brush-packed/blocked; visible discouragement of re-use	Inspection; post-rain checks	Contractor; ECO	Weekly; after rainfall	Rehab close-out forms; photos; GPS points

## 6.3 Soils, Erosion Control and Stormwater Management

### 6.3.1 Objective and performance standard

The objective of this method statement is to prevent **soil degradation, erosion initiation and sediment mobilisation** associated with exploration activities on **EPL 9292**, recognising that erosion impacts can be disproportionate in semi-arid environments where intense episodic rainfall events can rapidly concentrate runoff along disturbed corridors (tracks, pads, trenches) and deliver sediment to ephemeral drainage lines. This section therefore establishes controls to maintain soil stability, preserve infiltration where possible, prevent channelling of stormwater, and protect drainage features through avoidance buffers (linked to **Section 6.1**) and minimal clearing (linked to **Section 6.2**).

#### **Performance standard:**

- No creation of new erosion features (rills, gullies) attributable to the project.
- No measurable sediment deposition into drainage lines caused by project activities.
- All disturbed surfaces stabilised promptly with **progressive rehabilitation** and verified close-out.
- Stormwater managed so that flow paths are dispersed and returned to natural patterns, not concentrated by tracks or pad berms.

### 6.3.2 Applicability

This method statement applies to all activities with ground disturbance potential, including:

- use or formation of tracks and access spurs;
- geophysical line preparation (if any);
- drill pad and camp establishment;
- trenching/pitting and stockpiling (if authorised);
- installation of temporary sumps/settling pits (if authorised/required);
- water carting and any grading/scraping for access or safety.

### 6.3.3 Baseline sensitivity and linkage to other controls

Erosion risk on EPL 9292 is controlled by slope, soil texture/structure, vegetation cover, and drainage connectivity. The primary protection mechanism is **avoidance of high-risk zones**, which is already embedded in:

- **Section 6.1 (Drainage buffers and route approval):** prevents disturbance in or near channels and limits crossings, reducing direct sediment delivery risk.
- **Section 6.2 (Minimal clearing):** maintains ground cover and root structure, improving soil stability and infiltration and reducing wind/water erosion susceptibility.

This section provides the engineering and operational measures to control erosion where disturbance is unavoidable.

### **6.3.4 Planning and siting controls (avoidance first)**

#### **(a) Site selection rules for pads, camps, laydowns and trenches**

Before disturbance, the Site Supervisor (with ECO input where feasible) must apply the following siting rules:

- Prefer **stable interfluves** and gently sloping ground over valley floors, swales and convergent hollows.
- Avoid siting any pad/camp/laydown/trench on:
  - steep slopes,
  - depositional flats with evidence of sheetflow,
  - areas with active rills/gullies,
  - within drainage buffers (Section 6.1), or
  - near tributary confluences where runoff concentrates.
- Ensure that pad edges do not create berms that divert runoff toward channels.

#### **(b) Wet-season and storm-event precautions**

- Schedule new ground disturbance, where practicable, outside periods of forecast intense rainfall.

- Establish a practical storm readiness protocol: secure stockpiles, stabilise exposed soils, and avoid travel on wet tracks that can rut and create permanent flow channels.

### **6.3.5 Soil handling and surface protection (method statement)**

#### **(a) Topsoil and soil horizon management (where applicable)**

Where soils are sufficiently developed to distinguish topsoil:

- Strip and stockpile **topsoil separately** (where practicable) for later re-spreading during rehabilitation.
- Keep topsoil stockpiles:
  - low (<1–1.5 m) and stable,
  - within approved footprints,
  - outside drainage buffers,
  - not placed where they block natural runoff paths.

In very shallow, stony soils typical of many exploration settings, “topsoil” may be limited; in such cases the priority is to minimise disturbance and use scarification/brush packing during rehabilitation to restore stability.

#### **(b) Compaction minimisation**

Compaction reduces infiltration and increases runoff. Controls include:

- Restrict driving to **one defined track** (no braiding).
- Prohibit unnecessary turning and “spinning” of tyres.
- Keep heavy vehicles on the most stable ground and avoid repeated passes on soft soils.
- Avoid grading unless required for safety or access; if grading occurs it must include drainage relief measures (water bars/turnouts).

#### **(c) Clearing limits and ground cover retention (link to Section 6.2)**

- Maintain vegetation cover wherever possible—vegetation is the primary erosion control in semi-arid systems.

- Use selective trimming instead of clearing; keep cleared width to the approved minimum.
- Do not clear vegetation in drainage corridors or riparian zones.

### **6.3.6 Track and access erosion control (primary operational risk)**

#### **(a) Track alignment and construction rules**

For any unavoidable new temporary spur (last resort under Section 6.1 approval):

- Align tracks to avoid steep fall-lines; where possible, follow gentle contours to reduce flow concentration.
- Avoid low points and swales that convey sheetflow; if unavoidable, design crossing and install stabilisation.
- Do not create continuous berms along track edges that channel runoff; break berms and provide dispersal.

#### **(b) Drainage relief structures (practical measures)**

The following simple measures must be used as needed, based on site conditions:

##### **1. Water bars / diversion humps**

- Low ridges angled across the track to divert runoff off the track into stable vegetated areas.
- Install on sloping sections where runoff may concentrate, especially after grading.

##### **2. Turnouts / cross-drains**

- Shallow cut-outs that direct water away from the track at intervals.
- Ensure discharge is onto stable ground, not into channels.

##### **3. Armouring at crossings**

- Use rock/stone armouring at approved crossings where rutting risk is high.
- Avoid importing gravel unless essential; if imported, approve source to reduce invasive risk (link to 6.2).

#### 4. **Rutting avoidance**

- Suspend travel on saturated tracks where rutting is occurring; ruts become preferential flow paths and initiate gullies.

#### **(c) Channel crossing rules (link to Section 6.1 buffers)**

- Crossings are permitted only at existing or specifically approved crossing points.
- Do not widen crossings or cut banks.
- Stabilise approaches if rutting begins.
- If a crossing fails (erosion, bank collapse), stop using it until repaired and stabilised under ECO/Site Supervisor oversight.

### **6.3.7 Drill pads, trenches and camp stormwater controls**

#### **(a) Drill pads (if authorised)**

- Site pads on gently sloping ground away from drainages; maintain buffers (Section 6.1).
- Construct pads to shed water without concentrating flows.
- Where pad cut/fill is required, stabilise batters and avoid creating bare erodible slopes.
- Use **shallow diversion berms** upslope only where needed to keep clean runoff away from operational areas, ensuring diverted water is discharged onto stable ground and not into channels.

#### **(b) Trenches/pits (if authorised)**

- Avoid trenching in drainage-linked depressions and along valley floors.
- Manage excavated material to prevent it washing into channels:
  - place spoil on the upslope side where appropriate,
  - compact lightly to reduce erosion,
  - stabilise/cover spoil if rainfall is forecast.
- Do not leave open trenches that can capture runoff; backfill or secure if operations pause.

### **(c) Camps and laydown areas**

- Site camps on stable, well-drained ground (not in swales).
- Implement basic stormwater control:
  - keep surfaces compact and tidy,
  - prevent ponding,
  - ensure runoff disperses to natural flow paths.
- Do not allow greywater discharge to form erosion channels; manage greywater as per sanitation requirements (Section 6.6).

### **6.3.8 Progressive rehabilitation and erosion repair**

#### **(a) Progressive rehabilitation principles**

Rehabilitation must occur **as soon as practicable** after an area is no longer needed, to minimise the time that soils remain exposed and vulnerable. Rehabilitation must be recorded in the Disturbance Register (Section 6.1).

#### **(b) Standard rehabilitation actions**

Depending on disturbance type:

- **Ripping/scarifying** compacted surfaces to restore infiltration and reduce runoff velocity.
- **Re-contouring** to restore natural micro-topography and eliminate berms/ruts that concentrate water.
- **Brush packing** with cleared vegetation (link to 6.2) to stabilise surfaces, reduce wind erosion, and discourage re-use of closed tracks.
- **Stone lines / rock packing** on small rills and erodible slopes to slow flow and trap sediment (use local rock where available).
- **Closure berms** and “soft barriers” (brush/rocks) to prevent vehicle re-entry and track proliferation.

#### **(c) Erosion response protocol (trigger-based)**

If rilling/gullying begins, the Site Supervisor must:

1. Stop traffic or disturbance causing the erosion.
2. Implement immediate stabilisation (brush packing, stone checks, diversion off the disturbed surface).
3. Notify ECO and record as a non-compliance/incident if caused by project activities.
4. Review whether route/pad design requires change (MoC process).

### **6.3.9 Inspections and monitoring (storm-focused)**

#### **(a) Routine inspections**

- ECO/Site Supervisor to inspect:
  - high-use tracks (especially on slopes),
  - any new spurs,
  - drill pads and trenches,
  - drainage crossing approaches, and
  - rehabilitation sites.

#### **(b) Post-storm inspections (mandatory trigger)**

Because erosion often initiates after rainfall, the following is mandatory:

- Conduct a targeted inspection **after significant rainfall events** (or where runoff is observed), focusing on rutting, new rills, crossing stability, sediment deposition and diversion structure performance.
- Implement corrective actions immediately if erosion is identified.

### 6.3.10 Mini monitoring table: Soils, Erosion and Stormwater

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Avoidance of erosion-prone areas and drainage buffers (linked to 6.1)	No pads/trenches/camps in drainage buffers; minimal crossings	Pre-approval screening; site inspections	Site Supervisor; ECO	Pre-disturbance + weekly	Approval forms; GPS overlays; photos
Clearing minimised to retain soil stability (linked to 6.2)	Clearing widths within limits; ground cover retained outside footprint	Inspection; photo checks	ECO; Contractor supervisor	Weekly during clearing	Inspection logs; Disturbance Register
Tracks designed to prevent runoff concentration	No continuous ruts/berms; water bars/turnouts installed where needed	Field inspection; maintenance checks	Site Supervisor; Contractor	Weekly; after grading	Track maintenance log; photos
Crossings stable and not eroding	No bank collapse/rutting at approaches; no sediment fans into channels	Site inspection; post-storm checks	Site Supervisor; ECO	Weekly + after rainfall	Crossing checklist; photos
Pads/trenches/camps manage stormwater without erosion	No rills/gullies on pads; spoil stable; no ponding causing scour	Inspection; post-storm checks	Contractor; ECO	Weekly; after rainfall	Inspection logs; photos; corrective actions
Progressive rehabilitation implemented promptly	% disturbed areas rehabilitated within agreed timeframe; closure effective	Register audit; site verification	Contractor; ECO	Weekly; at demobilisation	Rehab close-out forms; before/after photos; GPS points
Rapid response to erosion initiation	Time from detection to stabilisation; recurrence rate	Incident/non-compliance review	Site Supervisor; ECO	As triggered	Incident log; MoC record; corrective action forms

## 6.4 Water Resources Protection (Surface Water + Groundwater)

### 6.4.1 Objective and performance standard

The objective of this method statement is to prevent any degradation of **surface water features (ephemeral drainage lines)** and **groundwater resources** within and adjacent to **EPL 9292**, recognising that even where surface flows are episodic and groundwater yields may be locally variable, the consequences of contamination in arid environments are typically high (limited dilution, slow recovery, and dependence on waterpoints for livelihoods).

#### **Performance standard:**

- Zero discharge of pollutants to drainage lines and zero contamination of groundwater attributable to exploration activities.
- No refuelling, hazardous storage, waste handling, sanitation systems, or drilling-fluid/cuttings management within specified buffer distances.
- Stormwater is managed to prevent sediment-laden runoff and to maintain natural drainage patterns (link to Section 6.3).
- Water sourcing is lawful, disclosed, and does not compromise local users.

### 6.4.2 Applicability

This method statement applies to all activities and facilities that may affect water resources, including:

- access roads and crossings;
- camps and laydown areas;
- fuel storage and refuelling;
- waste storage and disposal;
- sanitation and greywater;
- trenching/pitting;
- drilling (RC/diamond), including sumps, cuttings and washdown;
- water abstraction (existing boreholes/wells) or water carting.

### 6.4.3 Water resource receptors and sensitivity (EPL 9292 context)

Water resources potentially affected by exploration include:

- **Ephemeral drainage lines:** typically dry but can convey high-energy runoff after intense rainfall, quickly transporting sediments and contaminants.

- **Groundwater:** accessed via boreholes/wells and potentially present in fractured aquifers and alluvial/colluvial deposits; critical for farms/communities, livestock, and any project water needs.
- **Waterpoints and associated infrastructure:** boreholes, windpumps, tanks, troughs, pipelines—highly sensitive because they underpin livelihoods.
- **Soil-water interface:** spills and poor waste management can infiltrate through permeable soils and fractures, creating persistent contamination sources.

Given these receptors, the primary controls are: strict **avoidance buffers** (Section 6.1), **erosion and stormwater controls** (Section 6.3), and robust **hazardous substances controls** (expanded in Section 6.5).

#### 6.4.4 Avoidance buffers and exclusion zones (mandatory)

##### (a) Drainage lines (surface water protection)

The drainage buffers established in **Section 6.1** apply as minimum standards:

- No siting of **camp, fuel storage, refuelling points, waste areas, drill pads, sumps, laydowns** within **50 m** of mapped or clearly evident drainage lines/ephemeral channels.
- No new tracks within **30 m** of drainage lines unless unavoidable and specifically approved; any such route must include erosion/stormwater relief measures (Section 6.3).
- Crossings may occur only at **existing or specifically approved** points and must be stabilised to prevent rutting and bank erosion.

##### (b) Waterpoints and boreholes

The waterpoint buffers established in **Section 6.1** apply as minimum standards:

- No refuelling, fuel/chemical storage, sanitation facilities, washing, waste storage or spill-prone activities within **100 m** of any waterpoint infrastructure.
- No drill pads, trenches, camps or laydowns within **100 m** of waterpoints unless specifically approved with landowner consent and additional controls.
- The project must not obstruct livestock access and must avoid dust nuisance around waterpoints through strict traffic and speed control.

##### (c) Field refinement and no-go marking

Where field verification shows larger channels, flood-prone flats, or evidence of active flow paths, buffers must be increased at the ECO's discretion. Drainage lines and waterpoints within operational areas must be identified on the ground (flagging/signage) where practical.

#### **6.4.5 Water sourcing and use (lawful, transparent, minimal demand)**

##### **(a) Water supply principle**

Exploration water demand must be minimised and met through **lawful** and **agreed** sources. The default hierarchy is:

1. **Water carting** from authorised suppliers or permitted sources.
2. **Use of existing boreholes/wells** only where lawful and with written landowner/authority consent.
3. **New abstraction/borehole drilling** is avoided at scoping/early exploration stage; if required, it must be treated as a change trigger requiring MoC and potential additional authorisation.

##### **(b) Water use efficiency**

- Use water efficiently (controlled use at camps, targeted dust suppression only at high-use points where feasible).
- For drilling (if authorised), apply efficient circulation practices and minimise unnecessary washdown.

##### **(c) Documentation**

Maintain a **Water Use Log** recording:

- source location, consent/permit references, quantities (estimated or metered where feasible), dates, and purpose (camp, drilling, dust suppression).  
This is important for stakeholder trust and ECC auditability.

#### **6.4.6 Surface water protection (drainage integrity and sediment control)**

##### **(a) No pollution or discharge to drainage lines**

- No disposal of waste, cuttings, greywater, sewage, hydrocarbons, or chemicals into drainage lines or areas that may convey runoff to channels.
- No washing of vehicles/equipment in channels or on surfaces draining directly into channels.

##### **(b) Sediment control ([link to Section 6.3](#))**

Because sediment is a major “water quality pollutant” during storm runoff, the following apply:

- Prevent rutting on tracks and at crossings (ruts become flow channels).
- Stabilise disturbed ground promptly (ripping, re-contouring, brush packing, stone checks).
- Protect spoil piles and pad edges from erosion; avoid placing spoil where it can wash into channels.

### **(c) Crossings and storm readiness**

- Keep crossings minimal and stable; inspect crossings routinely and after rainfall.
- If a crossing shows erosion, rutting, or bank instability: suspend use and implement stabilisation under ECO/Site Supervisor oversight.

## **6.4.7 Groundwater protection (contamination prevention and controls)**

### **(a) Primary contamination pathways**

Key groundwater contamination risks during exploration are:

- Hydrocarbon leaks/spills from vehicles, generators, and refuelling.
- Poor sanitation and greywater management at camps.
- Uncontrolled drill cuttings and fluids (if drilling occurs).
- Waste mismanagement leading to leachate or scattered litter.

### **(b) Controls (core requirements)**

- Store all fuels/oils/chemicals in bunded areas ( $\geq 110\%$  of largest container) and ensure drip trays during refuelling (interface with Section 6.5).
- Keep sanitation facilities managed and leak-proof; ensure sewage is removed by licensed service providers or managed through approved portable systems.
- Ensure that any drilling-related sumps (where required) are appropriately lined/contained and located outside drainage buffers.
- No burial of hazardous wastes; all hazardous waste removed to authorised facilities.

### **(c) Drillhole and borehole integrity (if drilling occurs)**

- Prevent cross-contamination of aquifers by ensuring appropriate drilling practices and secure handling of fluids.
- Plug/secure drillholes as required by good practice and any regulator/landowner requirements.
- Do not leave open holes that may act as contamination conduits or safety hazards.

## **6.4.8 Camps, sanitation and greywater (water resource interface)**

### **(a) Camp siting (water protection criteria)**

- Camps must be located on stable, well-drained ground outside drainage buffers and waterpoint buffers.
- Camps must not be placed in swales or areas prone to ponding/flow concentration.

### **(b) Sanitation and greywater rules (summary interface; detailed in Section 6.6)**

- Use portable toilets or managed ablution systems; no open defecation.
- Greywater must be managed to avoid ponding or channelised flows; no discharge into drainages.
- All wastewater removal/disposal must be documented.

#### **6.4.9 Incident response and reporting (water-related triggers)**

##### **(a) Immediate response triggers**

Stop-work and immediate response is required for:

- any spill that is not immediately contained, especially if near a drainage line, low point, or permeable surface;
- evidence of contaminated runoff migrating toward a drainage line;
- sewage leaks;
- drill fluid/cuttings loss to the environment beyond the contained footprint.

##### **(b) Response actions (minimum)**

- Stop source, contain spread, recover contaminated material, and dispose at authorised facility.
- Record incident in the Spill/Incident Register; implement corrective action and review via MoC if systemic.

#### **6.4.10 Monitoring and verification**

##### **(a) Routine inspections**

The ECO/Site Supervisor must verify:

- compliance with drainage and waterpoint buffers;
- integrity of crossings and evidence of sediment delivery;
- camp sanitation effectiveness and absence of discharges;
- evidence of leaks from vehicles/generators;
- presence and readiness of spill kits.

##### **(b) Post-rainfall inspections (mandatory)**

After notable rainfall/runoff events:

- inspect tracks, crossings, pads, spoil piles and any downslope areas for rilling and sediment movement;

- confirm that no sediment fans or contaminant pathways have formed toward drainage lines;
- implement corrective actions immediately.

**(c) Optional water quality baseline/trigger monitoring (risk-based)**

At exploration scoping level, routine water quality monitoring is not always required. However, if:

- drilling becomes intensive/extended,
- there are known sensitive waterpoints nearby, or
- stakeholders raise concerns,  
then implement targeted baseline/spot checks (e.g., EC, pH, turbidity) at agreed waterpoints with landowner consent, and document results for transparency.

6.4.11 Mini monitoring table: Water Resources Protection

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Drainage buffers enforced (link to 6.1)	Zero facilities/pads/fuel/waste crossings only within 50 m of drainages; approved	Pre-approval screening; overlay; inspections	GPS Site site ECO	Supervisor; Pre-disturbance weekly; after rainfall	+ Approvals; GPS points; inspection logs; photos
Waterpoint enforced (link to 6.1)	Zero refuelling/waste/sanitation within 100 m; no obstruction to livestock	Inspections; landowner feedback	Site Supervisor; ECO	Weekly; during high activity	Inspection logs; stakeholder log; incident register
Sediment effectiveness (link to 6.3)	No sediment fans into channels; stable crossings and track relief	Post-storm drainage inspections; crossing checks	Site Supervisor; Contractor; ECO	After rainfall weekly	+ Post-storm checklist; photos; corrective action forms
Lawful sourcing and minimised demand	water Documented source and water quantities recorded	source permissions; Water Use consent records	Log; Proponent; Supervisor	Site Continuous; reviewed monthly	Water Use Log; agreements/permits

<b>Measure Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Groundwater contamination prevention	No leaks/spills; bunds and drip trays in place	Inspections; maintenance checks	Contractor; HSE; ECO	Weekly; daily during refuelling/drilling	Inspection logs; hazardous substances register
Sanitation greywater control	No sewage leaks; no discharge to drainages	Inspections; service records	Site Supervisor; Contractor; ECO	Weekly	Sanitation log; service receipts; photos
Spill/event readiness and response	Spill kits present; response time; incidents closed out	Spot checks; incident review	Site Supervisor; ECO; HSE	Weekly; as triggered	Spill kit checklist; incident register; disposal receipts

## 6.5 Fuel, Hazardous Substances and Spill Prevention/Response

### 6.5.1 Objective and performance standard

The objective of this method statement is to prevent pollution and ensure effective management of fuels, oils, lubricants and any hazardous substances used during exploration on **EPL 9292**, with particular focus on preventing contamination of soils, drainage lines and groundwater (link to **Section 6.4**) and preventing nuisance and safety risks associated with poor storage and handling. Given the arid/semi-arid context and reliance on groundwater/waterpoints, even small spills can create long-lasting impacts; prevention and rapid containment are therefore critical.

#### Performance standard:

- **Zero uncontrolled releases** of hydrocarbons or hazardous substances to the environment.
- All fuels and hazardous substances stored in **bunded containment (≥110%)** and handled only in controlled areas.
- **No refuelling** or hazardous handling within waterpoint buffers or drainage buffers (link to **Section 6.1** and **6.4**).
- All spills contained and cleaned up immediately, contaminated materials disposed of lawfully, and incidents recorded and closed out with evidence.

### 6.5.2 Applicability

This method statement applies to:

- diesel/petrol storage (including jerry cans and bulk tanks), oils and lubricants;
- drilling additives/consumables (if drilling occurs), greases, hydraulic fluids;
- generators, compressors and mobile plant;
- refuelling operations (mobile and fixed);
- transport of fuels and hazardous substances;
- storage and use of cleaning agents, solvents, batteries, and any other hazardous materials used on site.

### 6.5.3 Roles and responsibilities (minimum)

- **Proponent/Site Supervisor:** ensures procedures are implemented, refuelling sites designated, and resources (bunds/spill kits) available.
- **ECO:** verifies compliance, inspects storage/refuelling areas, audits logs, and escalates non-compliance.
- **HSE Officer/Function:** ensures training, emergency preparedness, PPE, and incident reporting.
- **Contractors/Drill contractor:** responsible for bunding, housekeeping, leak prevention, spill response readiness, and waste disposal documentation within their work areas.
- **All personnel:** duty to report leaks/spills immediately and stop work if imminent environmental harm is likely (stop-work protocol in Section 4.6).

#### **6.5.4 Hazardous substances inventory and Safety Data Sheets (SDS)**

##### **(a) Hazardous Substances Register**

Before mobilisation and updated throughout operations, maintain a **Hazardous Substances Register** including:

- substance/product name and use;
- hazard classification (as per SDS);
- maximum quantity stored/used on site;
- storage location;
- responsible person/contractor;
- SDS availability and revision date;
- specific controls required (bunding, PPE, incompatibilities).

##### **(b) SDS availability and communication**

- SDS for all hazardous substances must be available on site (hard copy and/or digital) and accessible to personnel.
- Personnel handling hazardous substances must be briefed on key risks, PPE and first aid measures as part of induction/toolbox talks.

## **6.5.5 Storage requirements (bundling, segregation, siting)**

### **(a) Siting rules (buffers and exclusions)**

All fuel storage, refuelling and hazardous substance storage must comply with:

- **≥100 m** away from waterpoints (Section 6.1/6.4).
- **≥50 m** away from drainage lines and any low points that convey runoff (Section 6.1/6.4).
- Located on stable, well-drained ground, not in swales, not on steep slopes, and not where stormwater can pond.

### **(b) Bunding and secondary containment**

- All bulk tanks, drums and hazardous containers must be placed within a bund or secondary containment system with minimum capacity of **110% of the largest container**, or **25% of total stored volume** (whichever is greater) as good practice for mixed storage (use the stricter applicable criterion).
- Bunds must be impermeable (e.g., lined or constructed with appropriate materials) and kept free of debris.
- Bunded areas must be inspected for integrity, and any accumulated rainwater must be managed as potentially contaminated unless confirmed clean (see 6.5.9).

### **(c) Container standards and labelling**

- All containers must be intact, sealed, clearly **labelled**, and stored upright.
- No unlabelled containers are permitted.
- Use drip trays under small containers (e.g., jerry cans, oil containers) when in storage.

### **(d) Segregation and incompatibles**

- Store fuels separately from oxidising chemicals and other incompatibles (as per SDS).
- Store batteries and hazardous wastes in designated areas with containment and weather protection.

### **(e) Generator and plant leak prevention**

- Generators/compressors must sit on drip trays or within contained areas where feasible.
- Daily pre-start checks must confirm no leaks and that hoses/fittings are intact.

### **6.5.6 Refuelling procedures (controlled activity)**

#### **(a) General rules**

Refuelling is a high-risk activity and must be controlled as follows:

- Refuelling only at **designated refuelling points** approved by Site Supervisor (and screened by ECO where feasible).
- No refuelling within buffers (waterpoints/drainages) or on surfaces that drain directly to channels.
- No refuelling during heavy rain or when runoff is present/likely.
- No unattended refuelling; refuelling must be supervised by a trained person.

#### **(b) Mobile refuelling (field refuelling)**

Where mobile refuelling is required:

- Use a mobile bowser or approved containers with controlled pour spouts.
- Place **drip trays** under nozzles/couplings and under equipment fill points where practicable.
- Keep a spill kit within immediate reach.
- Stop engines where safe to do so; prohibit smoking and ignition sources.

#### **(c) Refuelling step-by-step checklist (minimum)**

1. Confirm location is approved, stable and outside buffers.
2. Deploy spill kit and drip tray; ensure fire extinguisher available.
3. Inspect hose/nozzle/couplings for leaks/damage before dispensing.
4. Refuel slowly; never “top off” to overflowing.
5. Close and secure caps; wipe drips; remove drip tray carefully.

6. Inspect ground for any spills; if present, respond immediately (6.5.10).
7. Record refuelling event (where required), especially for bulk transfers.

#### **6.5.7 Transport of fuels and hazardous substances**

- Transport fuels in approved containers secured upright, with caps sealed, and protected from damage.
- Vehicles transporting hazardous substances must carry a basic spill kit and fire extinguisher.
- Do not transport leaking containers; remove from service immediately.
- Maintain manifests for bulk deliveries and retain supplier documentation where applicable.

#### **6.5.8 Waste oils, oily rags, filters and hazardous waste management (interface with Section 6.6)**

- Waste oils, oily rags, used filters, contaminated absorbents and empty chemical containers must be treated as **hazardous waste** and stored in sealed, labelled containers in a bunded hazardous waste area.
- No burial, burning, or on-site dumping is permitted.
- Dispose through authorised waste service providers and retain disposal receipts/manifests.

#### **6.5.9 Bund water and stormwater in containment areas**

- Bunds must be kept free of standing water where possible.
- Where rainwater accumulates in bunds, treat as potentially contaminated.
- If visual sheen/odour is present, handle as contaminated and remove for lawful disposal.
- Do not pump/discharge bund water onto the ground unless it is confirmed uncontaminated and approved by ECO (with evidence and rationale).

## 6.5.10 Spill response procedure (step-by-step, mandatory)

### (a) Spill classification (for practical response)

- **Minor spill:** small leak/drip contained within drip tray or <~5 litres on soil, not near drainages/waterpoints.
- **Moderate spill:** >~5 litres or repeated leaks; requires containment, contaminated soil removal, and formal incident reporting.
- **Major spill:** any spill with potential to reach drainage lines, waterpoints, or groundwater; any spill not immediately contained; any spill >~20 litres (or as defined by ECC conditions/contract standards). Major spills trigger stop-work and escalation.

### (b) Immediate response actions (“Stop–Contain–Recover–Report”)

#### 1. STOP

- Stop the source immediately (close valve, upright container, shut down equipment).
- Stop work in the immediate area if necessary.

#### 2. CONTAIN

- Prevent spread using absorbent booms/socks, sand, soil berms, or spill pads.
- Protect pathways to drainages: block low points and flow paths first (highest priority).

#### 3. RECOVER / CLEAN UP

- Apply absorbent material to recover free product.
- Excavate contaminated soil where needed until visibly clean.
- Place contaminated materials in sealed, labelled containers/bags for hazardous disposal.

#### 4. REPORT

- Notify Site Supervisor immediately; notify ECO/HSE as per escalation.

- Record the spill in the Spill/Incident Register with photos and GPS point.
- If required by ECC conditions or severity, notify competent authority and landowner promptly.

## **5. RESTORE**

- Backfill excavated area with clean material (where appropriate), re-contour and stabilise.
- Implement measures to prevent recurrence (equipment repair, procedural changes, retraining).

### **(c) Special case: spills near drainages or waterpoints**

If a spill occurs within the buffer zone or has a realistic pathway to a drainage line:

- stop-work immediately;
- prioritise placement of booms/berms between spill and the drainage;
- escalate as a major spill;
- ensure ECO attends/oversees containment and clean-up;
- conduct post-clean inspection after the next rainfall event.

### **6.5.11 Minimum spill kit specification (site + vehicle kits)**

#### **(a) Minimum vehicle spill kit (each active field team / high-risk vehicle)**

Each operational team should carry at least one vehicle spill kit containing:

- absorbent pads (oil-only) – minimum 10–20;
- absorbent socks/booms – minimum 2;
- absorbent granules or equivalent – 1 small bag;
- heavy-duty disposal bags and cable ties;
- nitrile gloves (multiple pairs) and basic PPE (eye protection);
- small shovel/trowel;

- laminated quick-response card (“Stop–Contain–Recover–Report” + contacts).

**(b) Minimum refuelling/drill site spill kit (higher capacity)**

At each designated refuelling point and each drill rig (if applicable), provide a larger kit including:

- absorbent pads – minimum 50+;
- booms/socks – 4–6;
- absorbent granules – 1 large bag;
- drain covers or plastic sheeting (for temporary containment);
- shovel, pick and heavy-duty scoop;
- sealable hazardous waste drums or containers;
- PPE: nitrile gloves, chemical-resistant gloves, goggles/face shield;
- fire extinguisher appropriate to fuel fires;
- spill response signage and quick-response guide.

**(c) Spill kit readiness**

- Spill kits must be inspected weekly and after any use; depleted items replaced immediately.
- Inspection must be recorded on a Spill Kit Checklist.

**6.5.12 Training and drills**

- All personnel involved in refuelling or handling hazardous substances must receive task-specific training and spill response briefing.
- Conduct at least one **spill response drill per campaign** (and after any significant spill).
- Maintain training/drill records in the Training Register (Section 5).

### 6.5.13 Mini monitoring table: Fuel, Hazardous Substances and Spill Management

Measure / Commitment	Monitoring indicator	Method	Responsibility	Frequency	Evidence / Record
Hazardous Substances Register and SDS availability	Register complete and current; SDS accessible	Document audit	Site Supervisor; HSE; ECO	Monthly; at mobilisation	Hazardous Substances Register; SDS file
Bunding and storage compliance	100% of storage in bunds/drip trays; bund capacity adequate; no leaks	Site inspections; checklist	Contractor; Site Supervisor; ECO	Weekly; daily during drilling	Storage inspection logs; photos
Buffer compliance (drainages/waterpoints)	No storage/refuelling within buffers	GPS overlay; field inspection	Site Supervisor; ECO	Pre-approval + weekly	Approvals; GPS points; inspection logs
Refuelling procedure compliance	Refuelling only at approved points; drip trays used; no spills	Spot checks; refuelling checklist	Site Supervisor; Contractor supervisor	Weekly; during refuelling events	Refuelling logs/checklists; photos
Spill kit readiness	Spill kits complete; replacement after use	Spill kit checklist	Site Supervisor; HSE	Weekly; after use	Spill kit inspection forms
Spill response effectiveness	Time to containment; volume recovered; proper disposal	Incident review; close-out audit	ECO; HSE; Site Supervisor	As triggered	Spill/Incident Register; disposal receipts; before/after photos
Hazardous waste management	Proper storage of waste oils/rags/filters; lawful disposal	Inspections; manifest verification	Contractor; Site Supervisor; ECO	Weekly; monthly review	Hazardous waste log; manifests/receipts
Training and drills completed	% relevant staff trained; drill conducted	Training register audit	HSE; Site Supervisor	Monthly; per campaign	Training Register; drill report

## 6.6 Waste Management and Sanitation

### 6.6.1 Objective and performance standard

The objective of this method statement is to ensure that all waste streams generated during exploration on **EPL 9292** are **minimised, contained, collected, transported and disposed of lawfully**, and that sanitation is managed in a manner that prevents pollution of soils, drainage lines, and groundwater. Poor waste control is a common driver of reputational harm, wildlife interactions, and ECC non-compliance; sanitation failures can directly contaminate water resources and create serious community health concerns.

#### **Performance standard:**

- **Zero litter** and zero uncontrolled disposal/burning/burying of waste.
- All waste stored securely and removed to **authorised disposal facilities** with proof of disposal.
- **No discharge** of sewage or greywater to drainage lines or areas that convey runoff to channels (link to Section 6.4).
- Hazardous waste handled, stored and disposed of as per Section 6.5 with full traceability.

### 6.6.2 Applicability

This method statement applies to all exploration phases and facilities, including:

- temporary camps and day-operation staging areas;
- drill pads and drilling camps (if applicable);
- geophysical and sampling crews;
- laydown areas and refuelling points;
- vehicle maintenance activities and washdown (washdown should be avoided onsite unless controlled).

### 6.6.3 Waste management hierarchy and planning

#### **(a) Waste hierarchy (mandatory)**

All teams must apply the following hierarchy:

1. **Avoid / Reduce** (minimise packaging, bulk purchasing where possible).
2. **Reuse** (reusable water containers; avoid single-use plastics where practical).
3. **Recycle** (where services exist and are practicable).
4. **Dispose** (only at authorised facilities; no onsite dumping).

#### **(b) Waste management planning (pre-mobilisation)**

Before mobilisation, the Site Supervisor must confirm:

- waste storage arrangements at camp(s) and field staging points;
- waste collection frequency and transport logistics;
- the disposal route and authorised facility/service provider;
- hazardous waste storage and collection arrangements (oily waste, filters, contaminated absorbents, batteries).

#### **6.6.4 Waste stream classification (minimum categories)**

Waste must be segregated at source into at least the following categories:

1. **General domestic waste:** food waste, packaging, paper, plastics (non-hazardous).
2. **Recyclables** (where practicable): plastics, cans, paper/cardboard, glass.
3. **Scrap metal:** offcuts, worn parts (non-contaminated).
4. **Hazardous waste** (*interface with Section 6.5*):
  - waste oils and lubricants;
  - oily rags and absorbents;
  - used filters;
  - contaminated soils;
  - chemical containers (if not certified clean);
  - batteries;
  - aerosol cans;

- hydrocarbon-contaminated PPE or pads.

5. **Sanitary waste:** contents of chemical toilets/portable toilets; any related consumables.

If drilling is undertaken, additional waste streams may include:

- **Drill cuttings and drilling fluids** (handled under drilling method statements and water protection requirements; must not be discharged into drainages).

## 6.6.5 Waste containment and storage (site controls)

### (a) General waste containment

- Provide designated, clearly labelled bins/skips at camp and staging areas.
- All waste must be stored in **closed containers** or secured skips to prevent wildlife scavenging and wind-blown litter.
- Waste storage areas must be maintained in a clean, orderly condition with regular removal.

### (b) Waste storage location (water protection integration)

Waste storage and handling areas must comply with water protection buffers (Section 6.4):

- located outside **drainage buffers** and not in low points or swales;
- outside **waterpoint buffers** and away from livestock access routes;
- on stable ground where runoff will not carry waste/leachate toward channels.

### (c) Field operations (“pack-in/pack-out”)

For mapping/sampling/geophysics crews operating away from camp:

- apply strict **pack-in/pack-out** waste rules;
- carry waste bags on vehicles;
- prohibit disposal of any waste in the field (including cigarette butts and food scraps).

### (d) Litter prevention (zero-litter rule)

- Conduct daily housekeeping at camp and weekly checks along frequently used routes.

- Any litter observed must be collected immediately and recorded as a non-compliance if persistent.

#### **6.6.6 Hazardous waste management (interface with Section 6.5)**

Hazardous wastes must be managed as follows:

##### **(a) Hazardous waste storage**

- Store hazardous waste in a designated area with secondary containment (bunded) and weather protection where practical.
- Use sealed, labelled containers (drums) for waste oils and oily materials.
- Store contaminated absorbents and oily rags in sealed bags/containers to prevent leachate and odours.

##### **(b) Prohibited practices**

- No burning of any waste, particularly plastics, oily materials, or chemical containers.
- No burial or burial pits.
- No decanting of waste oils onto the ground or into sumps.

##### **(c) Disposal and documentation**

- Dispose hazardous waste through authorised service providers/facilities.
- Retain **manifests/receipts** for each disposal event and record in the Hazardous Waste Log.

#### **6.6.7 Sanitation management (portable toilets and hygiene)**

##### **(a) Sanitation standards (mandatory)**

- Provide adequate sanitation for all personnel at camps and any semi-permanent work sites (e.g., drill sites where crews are present for extended periods).
- **No open defecation** is permitted anywhere in the EPL.
- Toilets must be located outside drainage and waterpoint buffers and on stable ground.

## **(b) Portable toilets / managed ablutions**

Preferred sanitation options for exploration are:

- **portable chemical toilets**, serviced by competent providers; or
- managed ablution systems with contained waste removal.

Toilets must be:

- stable and secured (wind-proof);
- inspected routinely for leaks;
- serviced at appropriate intervals to prevent overflow.

## **(c) Hygiene and worker welfare**

- Provide handwashing facilities (water + soap/sanitiser).
- Provide clear rules on cleanliness and housekeeping to prevent vermin/wildlife attraction.

## **(d) Sanitary waste disposal**

- All toilet waste must be removed by authorised service providers and disposed of at authorised facilities.
- Retain service records/receipts for ECC audit purposes.

## **6.6.8 Greywater management (water protection integration)**

Greywater (from washing, kitchens, laundry) can cause pollution and erosion if unmanaged.

### **Controls:**

- Minimise greywater generation (water-efficient practices).
- Do not discharge greywater into drainage lines, channels, or onto slopes where it can form erosion rills.
- Where greywater discharge is unavoidable (for small camps), discharge to a controlled area:

- on stable ground,
  - dispersed (no point discharge), and
  - sufficiently far from drainages and waterpoints,
  - with measures to prevent pooling and odours (e.g., small infiltration area where suitable).
- Avoid use of harsh detergents and ensure biodegradable products where possible.

For larger or longer-duration camps, treat greywater management more conservatively (collection and removal where feasible), especially in sensitive zones.

### **6.6.9 Drilling-related wastes (interface note)**

If drilling is undertaken:

- manage drill cuttings/fluids per drilling method statements and water protection controls (Section 6.4).
- do not allow cuttings or fluids to enter drainages or disperse downslope.
- where sumps are required, they must be located outside buffers and appropriately contained; sumps must be closed and rehabilitated at demobilisation.

### **6.6.10 Monitoring, inspections and corrective actions**

#### **(a) Routine inspections**

The ECO/Site Supervisor must inspect:

- camp waste storage and housekeeping;
- presence of litter and wind-blown waste around camp and high-use areas;
- hazardous waste storage integrity and labels;
- sanitation facilities (stability, leaks, service schedule);
- any evidence of waste disposal in the field.

## **(b) Corrective action triggers**

Immediate corrective action is required if:

- litter is observed and not promptly cleaned;
- waste bins are overflowing;
- hazardous waste is not properly contained/labelled;
- sanitation leaks/overflows occur;
- any waste is dumped, burned, or buried.

## **(c) Incident response**

Sanitation leaks or hazardous waste releases must be treated as incidents:

- stop source; contain; clean up; remove contaminated materials; document and dispose lawfully; notify ECO and Site Supervisor; implement root-cause correction.

### 6.6.11 Mini monitoring table: Waste Management & Sanitation

Measure / Commitment	Monitoring indicator	Method	Responsibility	Frequency	Evidence / Record
Zero-litter and pack-in/pack-out compliance	Litter count = 0 at camp and field sites; no field dumping	Inspections; route sweeps	Site Supervisor; crew leads	ECO; Daily housekeeping; weekly ECO check	Inspection logs; photos; corrective action forms
Waste segregation and secure storage	Bins labelled; waste secured from wind/wildlife; no overflow	Camp inspections	Contractor/camp manager; Site Supervisor	Daily (camp); weekly (ECO)	Housekeeping checklist; photos
Lawful disposal of general waste	Waste removed on schedule; disposal receipts available	Document review	Site Supervisor	Weekly/monthly (depending on generation)	Waste register; receipts/manifests
Hazardous waste storage and containment (link to 6.5)	Bunded hazardous waste area in place; containers labelled; no leaks	Inspections; checklist	Contractor; HSE; ECO	Weekly; daily during drilling	Hazardous waste log; photos

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Hazardous waste disposal traceability	100% hazardous waste disposed through authorised provider	Manifest verification	Site Supervisor; ECO	Monthly; demobilisation	at Manifests/receipts; register
Sanitation provision and integrity	Adequate toilets; no leaks/overflows; service intervals met	Inspections; service records	Camp manager/Contractor; Site Supervisor	Weekly; servicing	after Sanitation log; service receipts; photos
Greywater and not discharged drainages	controlled No channelised greywater flow; discharge location stable	Inspection	Site Supervisor; ECO	Weekly	Inspection logs; corrective actions
Corrective closed out	actions Close-out timeframes met; recurrence rate	Register audit	ECO; Site Supervisor	Monthly; as triggered	Corrective action log; MoC records

## 6.9 Biodiversity and Fauna Interaction Controls

### 6.9.1 Objective and performance standard

The objective is to avoid and minimise impacts on vegetation communities, fauna, habitats, and ecosystem function within **EPL 9292**, recognising that exploration impacts are typically driven by access/footprint expansion, vegetation clearing, disturbance/noise, waste attracting wildlife, and mortality risks from vehicle collisions. This section builds directly on the **avoidance and footprint discipline** in Sections **6.1–6.3**, and on waste controls in **6.6**.

#### **Performance standard:**

- No disturbance to sensitive habitats (especially riparian/drainage-associated habitats) beyond approved footprints.
- No harm, harassment or intentional killing of wildlife; no project-related wildlife feeding or attraction.
- Vehicle-related fauna mortality is minimised through speed control and driving rules.
- Progressive rehabilitation supports recovery and reduces cumulative habitat fragmentation.

### 6.9.2 Applicability

Applies to all exploration activities and facilities, including mapping/sampling, geophysics, trenching, drilling, camps, laydowns, and all vehicle movements.

### 6.9.3 Key biodiversity receptors and risk context

At exploration scoping level, key receptors typically include:

- **Drainage-associated habitats** (often higher productivity and biodiversity): treated as sensitive via buffers (Section 6.1/6.4).
- **Rangeland vegetation** and locally dense shrub/tree patches that provide habitat and browsing resources.
- **Fauna**: reptiles, small mammals, birds, and larger mammals using tracks/waterpoints; livestock-wildlife interface areas.
- **Protected or notable plants**: large specimens and locally rare species, where present, requiring avoidance/micro-siting.

#### **6.9.4 Mitigation measures (method statement)**

##### **(a) Habitat avoidance and micro-siting (primary control)**

- Apply strict drainage and waterpoint buffers (Sections **6.1** and **6.4**)—these are the primary biodiversity protection measures.
- Avoid clearing in drainage corridors and any visually sensitive vegetation patches; re-route or micro-site pads/lines.
- Use existing tracks and minimise new spurs (Section **6.1**); restrict line cutting (Section **6.2**).

##### **(b) Fauna interaction rules (mandatory)**

- No feeding of wildlife and no intentional attraction (food waste must be secured; link to **6.6**).
- No hunting, trapping, or harassment of animals by any staff or contractors (zero tolerance).
- If fauna is encountered on routes or at work sites:
  - stop and allow animals to move away;
  - do not chase or attempt to handle wildlife unless trained/authorised for safe relocation (rare and only where necessary).

##### **(c) Vehicle collision prevention**

- Enforce speed limits (Section **6.7**) and reduce speed near waterpoints, dense vegetation, and at dawn/dusk.
- Avoid night driving where practicable.
- Record any wildlife collisions and implement corrective action (speed controls, route/time adjustments).

##### **(d) Lighting and nuisance controls (where relevant)**

- Keep lighting minimal and directed downward at camps/drill sites.
- Avoid bright floodlighting unless required for safety; if night work is unavoidable, reduce footprint and time.

**(e) Invasive species interface**

- Implement invasive prevention and rapid response (Section 6.2), with additional emphasis after rainfall events when weeds may establish along disturbed corridors.

**6.9.5 Monitoring and corrective actions**

- ECO/Site Supervisor inspections must include checks for:
  - disturbance outside approved footprints;
  - evidence of wildlife attraction (scavenging, waste exposure);
  - collision incidents;
  - invasive establishment along tracks/pads.

Any recurring issues trigger: re-induction, stricter speed and access controls, improved waste containment, and MoC review if the exploration footprint needs adjustment.

### 6.9.6 Mini monitoring table: Biodiversity and Fauna Interaction

Measure / Commitment	Monitoring indicator	Method	Responsibility	Frequency	Evidence / Record
Drainage habitats protected via buffers (link to 6.1/6.4)	No disturbance within buffers; approved crossings only	GPS overlay; inspections	Site Supervisor; ECO	Weekly; rainfall	after Inspection logs; GPS points; photos
No wildlife attraction (waste secured) (link to 6.6)	No exposed waste; no scavenging observed	Camp inspections	Camp manager/Contractor; ECO	Weekly	Housekeeping checklists; photos
Vehicle collision reduction	Number of wildlife collisions/near misses	Incident reporting	Drivers; Supervisor; HSE	Site Continuous; monthly review	Incident register; corrective actions
No harassment/hunting policy enforced	Zero confirmed cases	Induction/toolbox spot checks	+ Site Supervisor; ECO	Continuous	Induction records; disciplinary records (if any)
Invasive prevention and response maintained (link to 6.2)	IAS sightings promptly; no spread corridors	IAS inspections	ECO; Site Supervisor	Weekly; rains	after IAS register; treatment records

## 6.10 Heritage Chance Finds

### 6.10.1 Objective and performance standard

The objective is to prevent disturbance or loss of heritage resources—including archaeological artefacts, structures, graves, and palaeontological materials—during exploration activities on **EPL 9292**, particularly where ground disturbance occurs (new tracks, trenching, drill pads). Heritage impacts are often irreversible, so the core control is avoidance supported by a mandatory **chance-find procedure** and clear stop-work authority (Section 4.6).

#### **Performance standard:**

- Zero disturbance of graves or heritage sites.
- Any chance find is protected, reported and managed before works resume.

### 6.10.2 Applicability

Applies to all activities with ground disturbance potential: route formation/widening, trenching/pitting, drilling pad preparation, camp establishment, and any excavation or grading.

### 6.10.3 Heritage risk pathways

Exploration may affect heritage through:

- excavation and soil stripping (trenches, pits, sumps, pads);
- track formation and clearing;
- collection or displacement of artefacts;
- disturbance of graves or culturally significant sites.

### 6.10.4 Chance-find procedure (mandatory, step-by-step)

#### **(a) Recognise potential heritage materials**

All personnel must be trained to recognise indicators such as:

- stone tools, pottery shards, worked stone;
- bone concentrations or fossil-like materials;
- cairns, grave markers, ceremonial sites;
- ruins, old foundations, historical objects.

**(b) STOP WORK immediately**

If any suspected heritage item/site is discovered:

1. Stop work in the immediate area.
2. Do not touch, remove, collect, or disturb the item/site.
3. Stop vehicle movement and prevent further disturbance.

**(c) Secure and protect the area**

- Establish a temporary exclusion buffer (default **20–30 m**; increased if the feature appears extensive).
- Mark the area with tape/markers and prevent access.
- If a grave is suspected, treat as highly sensitive and increase the buffer.

**(d) Notify and escalate**

- Inform the Site Supervisor and ECO immediately.
- ECO to initiate the heritage response pathway, including consultation with relevant heritage authority and/or a qualified heritage specialist as appropriate.

**(e) Assessment and decision**

- A qualified specialist (or competent authority process) determines:
  - whether the find is heritage/palaeontology and its significance;
  - required avoidance buffer and whether permits are required;
  - whether works can resume and under what conditions (e.g., re-routing, monitoring).

**(f) Resume work only with approval**

Work may resume only once:

- the ECO and Site Supervisor confirm clearance/approval; and
- the agreed controls (reroute, buffer demarcation, monitoring) are implemented.

**6.10.5 Documentation requirements**

Record all chance finds in a **Chance-Find Register** including:

- date/time; GPS coordinates; description; photos; discoverer; immediate actions; buffer size; authority/specialist contacted; outcomes and approvals; close-out notes.

**6.10.6 Mini monitoring table: Heritage Chance Finds**

<b>Measure / Commitment</b>	<b>Monitoring indicator</b>	<b>Method</b>	<b>Responsibility</b>	<b>Frequency</b>	<b>Evidence / Record</b>
Workforce awareness and compliance	and % staff inducted on chance finds	Training/induction audit	Site Supervisor; At ECO	monthly	mobilisation; Induction register; toolbox records
Immediate stop-work protection of finds	and Response time; buffer established	Incident/chance-find review	ECO; Supervisor	Site As triggered	Chance-find register; photos; site notes
No disturbance of graves/sites	Zero confirmed disturbances	Inspections; stakeholder feedback	ECO; Supervisor	Site Weekly (during disturbance works)	Inspection logs; corrective actions
Specialist/authority engagement where needed	Contact outcomes documented	and Document review	ECO	As triggered	Correspondence records; approvals

## 6.11 Rehabilitation and Closure Criteria

### 6.11.1 Objective and performance standard

The objective is to ensure that all exploration-related disturbances on **EPL 9292** are rehabilitated progressively and closed to a standard that prevents erosion, prevents ongoing dust generation and track re-use, reduces invasive establishment, and restores land capability consistent with pre-disturbance use (primarily grazing). Rehabilitation is a core ECC expectation and must be **auditable** through coordinates, photos, and close-out verification (linked to Sections **6.1–6.3**).

#### **Performance standard:**

- Progressive rehabilitation implemented throughout operations (not left to end-of-campaign).
- No ongoing erosion or channelised runoff from disturbed areas.
- All temporary access spurs closed and effectively prevented from re-use.
- Waste removed and no contamination remains (spill sites remediated).
- Close-out evidence complete and verifiable.

### 6.11.2 Applicability

Applies to all disturbed areas, including:

- temporary access spurs and widened tracks;
- drill pads, sumps (if any), laydown areas, camp footprints;
- trenches/pits and spoil areas;
- any ancillary disturbance zones (parking/turning areas).

### 6.11.3 Rehabilitation principles (what “good” looks like)

Rehabilitation aims to:

- restore **surface stability** and natural micro-topography;
- restore infiltration and prevent runoff concentration;
- reinstate drainage patterns;

- reduce visual impact;
- support natural re-vegetation over time.

#### **6.11.4 Progressive rehabilitation requirements (timing)**

- Areas must be rehabilitated **as soon as practicable** once they are no longer required.
- High-risk areas (steeper slopes, crossings, pads near drainage connectivity) receive priority.
- No demobilisation from a work site (e.g., drill site) without a rehabilitation close-out inspection and sign-off process.

#### **6.11.5 Standard rehabilitation actions (by disturbance type)**

##### **(a) Tracks and access spurs**

- Remove or break any berms/ruts that channel water (link to **6.3**).
- Rip/scarify compacted surfaces along the track alignment (depth sufficient to break compaction, adjusted for soil/rockiness).
- Re-contour and blend into surrounding ground.
- Close entry points using brush packing, rocks, or soft barriers to prevent re-use (link to **6.2**).
- Install water bars/turnouts where residual slope may concentrate runoff.

##### **(b) Drill pads and laydown areas**

- Remove all waste and materials, including any contaminated materials.
- Rip/scarify compacted pad surfaces; re-contour pad edges and batters.
- Backfill and close any sumps; ensure no ponding and stable surfaces.
- Apply brush packing/stone packing where needed to stabilise and discourage access.

##### **(c) Trenches and pits (if authorised)**

- Backfill to near original ground level, compact lightly to reduce subsidence.
- Re-contour and ensure runoff disperses naturally.

- Stabilise spoil; apply brush packing where appropriate.

**(d) Spill remediation sites (interface with 6.5)**

- Remove contaminated soils/absorbents to authorised hazardous disposal.
- Backfill with clean material and stabilise.
- Record GPS location and maintain post-rainfall check.

**6.11.6 Closure criteria and sign-off requirements**

A disturbed site is considered “closed out” only when the following criteria are met:

**1. Footprint close-out**

- All disturbance coordinates captured; final footprint recorded.

**2. Stability**

- No visible rills/gullies; no active erosion; no sediment delivery to channels.

**3. Hydrology**

- No channelised runoff created by tracks/pads; drainage patterns restored.

**4. Access prevention**

- Closed spurs effectively blocked and not being re-used.

**5. Waste and contamination**

- No waste remains; no hydrocarbon staining; spill sites remediated and documented.

**6. Evidence**

- Before/after photos, close-out form completed, ECO verification recorded.

**6.11.7 Monitoring and post-rainfall verification**

- Rehabilitation sites must be checked after rainfall events (erosion triggers) and repaired if failures occur.
- Any rehabilitation failure triggers corrective action and MoC review of methods.

### 6.11.8 Mini monitoring table: Rehabilitation and Closure

Measure / Commitment	Monitoring indicator	Method	Responsibility	Frequency	Evidence / Record
Progressive rehabilitation implemented	% disturbed areas rehabilitated within set timeframe	Register audit; site verification	Contractor; Supervisor; ECO	Site Weekly; demobilisation	at Disturbance register; rehab close-out forms
Erosion-free rehabilitation outcome	No rills/gullies; no sediment fans	Post-rain inspections; photos	Site Supervisor; ECO	After rainfall monthly	+ Post-rain checklist; photos
Track/spur closure effectiveness	No re-use; entry blocked	Field checks; GPS	Contractor; ECO	Weekly	Closure photos; GPS points
Drill pad/sump closure verified	Pads ripped/re-contoured; sumps closed; no ponding	Inspections	Drill contractor; ECO	At demobilisation; post-rain	Close-out forms; photos
Spill remediation verified (link to 6.5)	Contaminated material removed; disposal evidence	Document review; inspection	ECO; HSE	As triggered	Spill register; receipts; photos
Invasive establishment prevented (link to 6.2)	No weed corridors along rehab sites	IAS inspections	ECO; Site Supervisor	After quarterly	rains; IAS register; treatment records

## 7. Monitoring Plan and Registers

### 7.1 Purpose and performance intent

This section consolidates the monitoring system required to demonstrate implementation of the EMP for **EPL 9292** and compliance with ECC conditions and land access agreements. The monitoring framework is designed to: (i) detect non-compliance early, (ii) verify the effectiveness of mitigation measures, (iii) provide an auditable evidence trail for ECC inspections, and (iv) support transparent engagement with landowners/communities through a functioning grievance mechanism.

#### Performance intent:

- Monitoring is **routine, documented, and risk-based** (more frequent during drilling/earthworks).
- All key environmental risks have **clear indicators, assigned responsibilities, and defined records**.
- Registers are kept current, backed up, and available for inspection at any time.

### 7.2 Monitoring approach and tiers

Monitoring is implemented at three tiers, aligned to exploration risk levels:

1. **Daily operational checks** (performed by Site Supervisor/Contractors)
  - housekeeping, waste, sanitation, vehicle condition, refuelling controls, and active worksite compliance.
2. **Routine compliance inspections** (ECO + Site Supervisor)
  - weekly or more frequent during high-intensity phases (drilling, trenching, high traffic).
3. **Triggered inspections**
  - post-rainfall checks (erosion/runoff), incident response follow-ups (spills), and complaint investigations.

### **7.3 Monitoring schedule (minimum frequencies by activity intensity)**

**Minimum inspection frequencies** (may be increased by ECO based on risk, season, or complaint history):

- **Low-intensity phase (mapping/sampling/geophysics; day trips):**
  - Site Supervisor checks: daily when teams are active
  - ECO inspections: at least **bi-weekly** (or as agreed)
  - Post-rainfall inspections: **as triggered**
- **Moderate-intensity phase (multiple teams; temporary camp; increased traffic):**
  - Site Supervisor checks: daily
  - ECO inspections: **weekly**
  - Post-rainfall inspections: **as triggered**
- **High-intensity phase (drilling/trenching/heavy vehicle mobilisation):**
  - Site Supervisor checks: daily + refuelling checks per event
  - ECO inspections: **weekly or more frequent** (e.g., twice weekly during mobilisation and initial pad establishment)
  - Post-rainfall inspections: mandatory for tracks/crossings/pads and rehab sites

### **7.4 Responsibilities (monitoring and recordkeeping ownership)**

**Proponent (Profile Energy / Project Manager):**

- overall accountability for ensuring monitoring occurs and reports are produced;
- ensures resourcing (ECO, forms, equipment) and contractors comply;
- reviews monthly performance summaries and ensures corrective actions are closed.

**Site Supervisor / Exploration Manager:**

- implements daily monitoring;
- maintains core registers (or delegates to a document controller);

- coordinates inspections, ensures evidence is collected, and executes corrective actions.

**ECO:**

- conducts compliance inspections;
- verifies register completeness and close-out evidence;
- issues corrective actions;
- prepares compliance summaries and supports reporting to authorities if required.

**HSE Officer/Function:**

- integrates environmental and safety incident reporting;
- verifies training, driver compliance, emergency readiness;
- supports investigation and corrective action tracking.

**Contractors (including drill contractor):**

- maintain operational checklists and logs within their scope (refuelling logs, maintenance logs, housekeeping checklists);
- provide evidence to Site Supervisor/ECO;
- implement corrective actions and rehabilitation.

## **8. Audits, Corrective Actions and Reporting (Implementation System)**

### **8.1 Purpose and performance intent**

This section establishes how the Proponent ensures continual compliance through: (i) internal audits and inspections, (ii) formal corrective and preventive action (CAPA) management, (iii) incident investigation, and (iv) structured reporting and document control. It ensures the EMP operates as a management system rather than a static document.

#### **Performance intent:**

- Issues are identified early, corrected quickly, and prevented from recurring.
- Repeat non-compliances are treated as systemic and trigger MoC and strengthened controls.
- Evidence is maintained to demonstrate due diligence and ECC compliance.

### **8.2 Audits and inspections (types and frequencies)**

#### **(a) Routine inspections (operational compliance)**

- ECO and Site Supervisor inspections as per Section 7 schedule.
- Contractor self-checks daily/weekly for their work areas.

#### **(b) Internal audits (system-level)**

Conduct internal audits at least:

- **Quarterly** during active exploration; or
- **Per campaign** (start/mid/end) where exploration is seasonal or episodic.

Internal audit scope should include:

- document control (latest EMP, route maps, MoC records);
- register completeness and evidence quality;
- compliance with buffers and route approvals;

- hazardous storage and spill readiness;
- waste and sanitation compliance;
- rehabilitation close-out effectiveness;
- grievance management and stakeholder communication records.

### **(c) Contractor audits**

Where drilling or major contractors are active, audit contractor compliance at least **monthly** during their mobilisation/operations, including method statements, maintenance logs, spill readiness, and rehab close-out performance.

## **8.3 Non-compliance classification (practical severity levels)**

To standardise response, classify findings as:

- **Minor non-compliance:** low risk, easily correctable, no environmental harm (e.g., bin not labelled, minor housekeeping lapse).
- **Major non-compliance:** significant risk or repeated minor issues; potential for harm or breach of buffers/route rules (e.g., unauthorised spur, refuelling not in designated area, sanitation leak).
- **Critical non-compliance/Incident:** actual environmental harm, spill not contained, entry into no-go zones, suspected heritage disturbance, or repeated major issues; triggers stop-work and escalation.

## **8.4 Corrective and Preventive Action (CAPA) procedure**

### **(a) CAPA steps**

1. **Record the issue** (inspection finding / incident / complaint).
2. **Assign responsibility** (named person/contractor) and a **due date**.
3. **Implement corrective action** (fix the immediate problem).
4. **Root-cause analysis** (for major/critical or recurring issues).

5. **Preventive actions** (training, procedure changes, engineering controls).
6. **Verification and close-out** by ECO/Site Supervisor with evidence.
7. **Escalation** if overdue or repeated (management intervention; potential contractor sanctions).

## **8.5 Incident management and investigation**

### **(a) Reportable incidents (minimum)**

- hydrocarbon/chemical spills;
- sewage/greywater releases;
- erosion failure causing sediment movement toward drainages;
- wildlife collisions (where significant or repeated);
- heritage chance finds;
- any event likely to generate stakeholder grievance or reputational risk.

### **(b) Investigation requirements**

For major/critical incidents:

- conduct a documented investigation within a defined period (e.g., 24–72 hours depending on access);
- identify root causes;
- implement CAPA;
- record evidence (photos, GPS, disposal receipts);
- determine whether authority notification is required under ECC conditions and document actions taken.

## **8.6 Management of Change (MoC) linkage**

Where audits, incidents, or monitoring show that:

- the activity envelope is evolving materially, or

- controls are ineffective, or
- new sensitivities are identified,

the **MoC procedure** (Section 5.6) must be triggered to revise method statements, adjust routes/siting, update training, and (where required) determine whether additional authorisation is needed.

## **8.7 Reporting and record retention**

### **(a) Reporting outputs (minimum)**

- Weekly compliance summary (ECO/Site Supervisor): key issues, actions, rehab progress, incidents, complaints.
- Monthly management report (Proponent): KPI dashboard (see below), CAPA status, MoC updates, and stakeholder engagement summary.
- End-of-campaign close-out report: footprints and rehab close-out evidence, waste disposal records, incident summaries, and outstanding commitments (if any).

### **(b) Suggested KPIs for the monthly report**

- number of route deviations (and close-out status);
- hectares/m<sup>2</sup> disturbed vs rehabilitated (progressive rehab ratio);
- number and volume of spills (and close-out time);
- number of complaints (dust/noise/access) and close-out time;
- number of non-compliances (minor/major/critical) and closure rate;
- training/toolbox talks completed vs planned.

### **(c) Record retention**

Maintain EMP records for at least the duration of the ECC validity and a reasonable period thereafter, including:

- registers, approvals, MoC records, photos/GPS datasets, disposal manifests, and stakeholder communications.

## **8.8 Enforcement and contractor management**

Where contractors repeatedly fail to comply:

- escalate to Proponent management;
- apply contractual remedies (penalties, suspension);
- require retraining and revised method statements;
- consider replacement where systemic non-compliance persists.

Stop-work authority remains in effect (Section 4.6) for critical risks and incidents.

## 9. Emergency Preparedness and Response

### 9.1 Purpose and performance intent

This section sets out the integrated **Emergency Preparedness and Response Plan (EPRP)** for exploration on **EPL 9292**, covering both environmental and HSE emergencies. The intent is to ensure that foreseeable emergencies are prevented where possible, managed rapidly and effectively when they occur, and documented to demonstrate due diligence and ECC compliance.

#### Performance intent:

- Emergency risks are identified and controlled through planning, training and readiness checks.
- Clear command structure and escalation pathways exist at site level.
- Emergency equipment is available, inspected and fit for purpose.
- Incidents are managed using a consistent approach: **protect life** → **prevent escalation** → **protect the environment** → **recover and restore** → **report and learn**.

### 9.2 Emergency risk scenarios (minimum set)

The following scenarios are considered credible for exploration operations in the EPL 9292 setting:

#### Environmental emergencies

- Fuel/chemical spill (minor/moderate/major) including spills with a pathway to drainage lines or waterpoints (links to Sections **6.4** and **6.5**).
- Sewage/greywater release from camp sanitation systems (link to **6.6**).
- Erosion or stormwater failure causing sediment delivery to drainages after rainfall (link to **6.3**).
- Wildfire caused by camp activity, vehicles or equipment.
- Discovery of graves/heritage during ground disturbance (link to **6.10**).

#### HSE emergencies

- Vehicle collision/rollover, including livestock/wildlife collisions (link to 6.7).
- Medical emergency (injury, snakebite, dehydration/heat stress).
- Fire/explosion risk at fuel storage/refuelling points.
- Severe weather event (intense rainfall, flooding at crossings, high winds/dust storms).
- Security incident (theft, conflict, unauthorised access).

### 9.3 Emergency organisation, roles and command structure

Emergency response operates under a simple incident command model appropriate to exploration operations:

- **Incident Controller (IC):** Site Supervisor (or most senior competent person present)
  - overall command; initiates stop-work; coordinates response; ensures reporting.
- **ECO (Environmental Lead):**
  - directs environmental containment and remediation (spills, erosion failures, sanitation releases); verifies buffers; manages evidence; advises on authority notifications.
- **HSE Lead / First Aid Officer:**
  - manages medical response, safety perimeter control, and coordination with emergency services; ensures PPE and responder safety.
- **Spill Response Team (as applicable):**
  - trained personnel responsible for deploying spill kits, booms, containment berms, and recovery materials.
- **Contractor Supervisors (incl. drill contractor):**
  - execute response actions within their work areas; provide equipment and personnel; implement corrective actions.

**Stop-work authority:** Any worker may initiate stop-work where imminent risk to life or serious environmental harm is likely, and must immediately notify the IC.

## **9.4 Emergency communications and escalation**

### **(a) Emergency contact list (site-controlled document)**

Maintain a current **Emergency Contact List** accessible at camp and in vehicles, including:

- Site Supervisor / Incident Controller
- ECO and HSE lead
- Medical/emergency services contacts
- Nearest clinic/hospital (as applicable for the operating area)
- Local police station
- Landowners/occupiers contact(s) for access and incident notification
- Key contractors (drill contractor supervisor, fuel supplier, sanitation service provider)

The contact list must be reviewed at mobilisation and updated whenever personnel change.

### **(b) Notification rules (internal/external)**

- **Immediate internal notification** for all incidents: IC + ECO + HSE.
- **Landowner notification** for incidents that may affect property, access, fences, livestock, waterpoints, or reputation (spills, fires, collisions, heritage).
- **Authority notification** where required by ECC conditions or incident severity, especially for major spills, heritage-related incidents, or significant pollution events.

All notifications must be documented (date/time, person contacted, summary).

## **9.5 Emergency equipment and readiness**

### **(a) Minimum emergency equipment (site level)**

- Vehicle and site spill kits as per Section 6.5 (including booms, pads, granules, PPE).
- Fire extinguishers at:
  - fuel storage/refuelling points;

- generators and high-risk equipment;
- key vehicles (where feasible).
- First aid kits in vehicles and at camp; at least one trained first aider per team.
- Communication devices (phones/radios) and backup charging/power.
- Basic recovery tools for erosion response (shovel, pick, sandbags/rocks/brush packing capability).
- Emergency lighting and signage at camp (as needed).

**(b) Inspection and readiness checks**

- Spill kit inspections weekly and after use (Section 7 templates).
- Fire extinguisher checks monthly (pressure/seal/expiry).
- First aid kit checks monthly and after use.
- Vehicle roadworthiness checks per Section 6.7.

**9.6 Emergency response procedures (step-by-step)**

### 9.9 Mini monitoring table: Emergency Preparedness and Response

Measure / Commitment	Monitoring indicator	Method	Responsibility	Frequency	Evidence / Record
Emergency equipment readiness	Spill kits complete; extinguishers/first aid kits in date	Checklist audits	Site Supervisor; HSE	Weekly (spill kits); monthly (others)	Checklists; photos
Emergency contacts current	Contact list reviewed/updated	Document control check	Site Supervisor	At mobilisation; monthly	Controlled contact list
Drills conducted	Drills completed; actions tracked	Drill reports	HSE; ECO	Per campaign; annually minimum	Drill records; CAPA log
Incident response effectiveness	Time to contain; recurrence rate	Incident review	ECO; HSE	As triggered; monthly review	Incident register; close-out evidence
Post-event learning applied	CAPA closure rate	CAPA audit	Site Supervisor; ECO	Monthly	CAPA register

## **10. Decommissioning / Final Closure and Post-Closure Commitments**

### **10.1 Purpose and closure principle**

This section defines how the Proponent will demobilise exploration activities, rehabilitate all disturbed areas, remove all wastes and infrastructure, and demonstrate closure to a standard acceptable to landowners and ECC compliance expectations. The closure approach is founded on **progressive rehabilitation** (Section 6.11) and **evidence-based close-out** (Section 7), ensuring that final closure is not left as a single end-of-project action.

**Closure principle:** return the land to a stable condition compatible with pre-existing land use (primarily grazing), with no residual contamination, no ongoing erosion, and no persistent access routes that promote cumulative disturbance.

### **10.2 Applicability and triggers for closure actions**

Final closure applies when:

- a campaign ends and sites are demobilised;
- exploration in an area is suspended for an extended period; or
- the ECC period ends or is not renewed;
- the proponent exits the EPL or transfers operations (handover requirements apply).

### **10.3 Decommissioning and demobilisation actions (minimum requirements)**

#### **(a) Removal of temporary infrastructure and materials**

- Remove all camp structures, storage facilities, signage (unless agreed), and temporary fencing/barriers.
- Remove all fuel storage systems, drums, jerry cans, and hazardous materials from site.
- Remove laydown materials, scrap, and any abandoned equipment parts.
- Ensure no waste remains at any work site, including drill pads and staging areas.

### **(b) Waste removal and disposal verification**

- Remove all general waste and hazardous waste; no burial/burning permitted.
- Compile a **final waste dossier**: disposal receipts/manifests for general and hazardous waste.

### **(c) Drill site closure (if drilling undertaken)**

- Close out drill pads and any sumps in line with Section **6.11**.
- Ensure any drill holes are left safe and in accordance with good practice and any applicable licence or landowner requirements (plugging/capping as required).
- Confirm no ponding or erosion risks remain.

### **(d) Track and access spur closure**

- Close and rehabilitate all temporary access spurs and any unauthorised tracks created (if any), including:
  - ripping/scarifying; re-contouring; berm removal; brush packing/rock barriers; water bars where needed.
- Ensure closed routes are not easily re-used (closure effectiveness is a core criterion).

## **10.4 Final rehabilitation completion and closure criteria**

Final closure is achieved only when the following are met across all disturbance sites (consistent with Section **6.11**):

1. **Stability**: no active erosion features; runoff disperses naturally.
2. **No contamination**: no staining/odours; spill sites remediated; contaminated soils removed and disposed.
3. **No waste**: all waste removed; receipts available.
4. **Access control**: temporary spurs closed; no track proliferation legacy.
5. **Evidence**: GPS coordinates, before/after photos, and sign-off forms complete.

6. **Stakeholder acceptance:** landowner/occupier consultation undertaken and issues addressed where practicable.

## **10.5 Closure verification, sign-off and reporting (implementation-ready)**

### **(a) Internal closure verification**

- Site Supervisor compiles a **Closure Pack** including:
  - updated Disturbance Register (final status for each site);
  - Rehabilitation Close-out Forms;
  - photos and GPS dataset;
  - waste disposal receipts/manifests;
  - incident and CAPA close-out summary;
  - final stakeholder communications/complaints close-out status.
- ECO conducts a closure inspection and provides written confirmation of closure status and any residual actions required.

### **(b) Landowner/occupier engagement at closure**

- Notify landowners before demobilisation.
- Offer a joint walkover (where feasible) to confirm closure outcomes and identify any residual concerns (e.g., gate/fence repairs, access reinstatement).
- Record agreements and any final actions.

### **(c) Authority reporting (where required)**

Where ECC conditions require a close-out submission, provide the relevant summary report and evidence pack. Even where not explicitly required, maintain readiness to provide closure evidence upon request.

## **10.6 Post-closure monitoring and commitments**

Because erosion and rehabilitation failures often emerge after rainfall, the following post-closure commitments apply (risk-based):

- **Post-rainfall verification:** inspect key rehab sites (crossings, steep segments, pads) after the first significant rainfall event following closure, where feasible and proportionate to intensity of disturbance.
- **Rectification commitment:** if erosion or instability is identified and attributable to the project, implement repairs promptly and document close-out.
- **Invasive monitoring:** if IAS establishment is observed along rehab corridors after rains, implement treatment consistent with Section 6.2.

The scope and frequency of post-closure monitoring should be proportional to the intensity of disturbance (drilling campaigns typically require more post-closure checks than mapping-only campaigns).

### **10.7 Handover, retention of records and continuity**

If the EPL changes hands or a new contractor/proponent takes over:

- provide the latest EMP, maps, registers, and disturbance/rehabilitation records;
- ensure open CAPAs and any residual obligations are clearly documented;
- maintain record retention in line with Section 8.7.

### 10.8 Mini monitoring table: Final Closure and Post-Closure

Measure / Commitment	Monitoring indicator	Method	Responsibility	Frequency	Evidence / Record
Closure pack completion	100% disturbance sites closed-out with evidence	Closure pack audit	Site Supervisor; ECO	At demobilisation	Closure pack; registers; photos/GPS
Waste removed and lawful disposal proven	Receipts/manifests complete	Document verification	Site Supervisor	At closure	Waste dossier; manifests
Access spurs closed effectively	No re-use; barriers intact	Field verification	ECO; Supervisor	Site At closure; post-rain check	Photos; GPS points
Rehab stability verified	No erosion/pooling/sediment fans	Post-rain inspection	ECO; Supervisor	Site After rain	significant Post-rain log; corrective actions
Residual issues addressed	All closure CAPAs closed	CAPA audit	Proponent; ECO	Within timeframe	agreed CAPA register; sign-offs

If you want the EMP to be fully submission-ready as a single coherent document, the last useful addition is a

## Conclusion and Recommendations

### Conclusion

This Environmental Management Plan (EMP) for **EPL 9292 (16,651 ha) near Fransfontein in the Kunene Region** has been prepared to provide a practical, implementation-ready management system for exploration activities associated with the proposed base and precious metals exploration programme. The EMP is structured around the key, predictable impact drivers for exploration in semi-arid rangelands—namely **access and footprint expansion, vegetation disturbance, erosion initiation and stormwater concentration, waste and sanitation failures, and fuel/hydrocarbon spill risks**—and integrates these controls into a coherent set of method statements, monitoring indicators, registers, and escalation procedures.

The EMP establishes a clear **avoid–minimise–rehabilitate** hierarchy, anchored by (i) strict route approval and GPS-based footprint control, (ii) mandatory buffers to drainage lines and waterpoints, (iii) progressive rehabilitation with auditable close-out criteria, and (iv) robust hazardous substances and spill response systems. When implemented as intended, the residual environmental risk of the exploration envelope is expected to be **low to moderate**, largely localised and reversible, provided that traffic discipline, erosion controls, waste management, and spill prevention measures are consistently enforced and verified through routine inspections and documented evidence. The monitoring framework (Section 7) and audit/CAPA system (Section 8) convert the EMP from a descriptive document into an operational compliance tool suitable for ECC expectations.

### Recommendations

To ensure the EMP achieves its intended outcomes and remains defensible during ECC review and any compliance inspections, the following recommendations are made:

- 1. Implement strict footprint governance from Day 1**  
Apply the route approval system, GPS tracking requirements, and disturbance register consistently. Treat unauthorised track creation and track braiding as major non-compliances requiring immediate closure and rehabilitation.
- 2. Maintain zero-tolerance controls around drainage lines and waterpoints**  
Enforce buffers for camps, refuelling, waste storage, sanitation, drill pads and crossings.

Where field verification indicates higher sensitivity (e.g., active flow paths or high-use livestock waterpoints), increase buffer distances and document the rationale.

- 3. Prioritise erosion prevention and post-rainfall verification**  
Given the episodic intense rainfall typical of the region, make post-rainfall inspections mandatory for crossings, sloping tracks, pads and rehabilitation sites, with rapid repairs where rilling or gullyng initiates. This is one of the most scrutinised exploration risks after track proliferation.
- 4. Elevate spill prevention and refuelling discipline as a critical control**  
Keep refuelling at designated points only, ensure bunding/drip trays are used, and maintain spill kits and trained responders. Any spill with a pathway to a drainage line or waterpoint must trigger stop-work, escalation, and documented remediation close-out.
- 5. Operate a visible and functional grievance mechanism**  
Maintain an accessible complaints register (dust/noise/access/waterpoints) with clear response timeframes, feedback loops, and close-out evidence. This reduces conflict risk and demonstrates good-faith management to both landowners and regulators.
- 6. Strengthen contractor compliance through audits and enforceable CAPA**  
During drilling or high-intensity phases, increase ECO inspection frequency and audit contractor records (refuelling, housekeeping, hazardous waste, rehabilitation). Repeat non-compliance should trigger formal CAPA escalation and management intervention.
- 7. Complete targeted pre-disturbance walkovers for sensitive work areas**  
Before trenching, drilling pads, new access spurs, or camps are established, conduct a short ECO-led walkover to confirm micro-siting, verify buffers, and identify any red flags (heritage indicators, sensitive habitats, erosion-prone surfaces).
- 8. Apply progressive rehabilitation and closure as a continuous process**  
Do not defer rehabilitation to end-of-campaign. Close and stabilise spurs, pads and trenches as soon as they are no longer needed, and compile closure packs (GPS + before/after photos + receipts) so that ECC close-out requirements can be met without delay.
- 9. Trigger Management of Change (MoC) for material scope escalation**  
If activities expand beyond the described envelope (e.g., increased drilling intensity,

new camps, new water abstraction, additional clearing), initiate MoC and determine whether additional assessment, permits, or ECC amendments are required before proceeding.

**10. Maintain a complete, inspection-ready evidence trail**

Keep all registers current, backed up, and available: disturbance/rehab records, spill and waste manifests, sanitation service records, inspection checklists, training registers, and stakeholder communications. The evidence trail is often the deciding factor in ECC compliance confidence.

**Overall recommendation:**

Proceed with exploration under this EMP, provided that the proponent commits adequate resources to implementation (competent Site Supervisor, active ECO oversight, trained contractors, and functional monitoring and CAPA systems). With these measures in place, exploration activities on EPL 9292 can be managed to maintain environmental integrity, protect water resources and livelihoods, and meet Namibia's ECC compliance expectations.