

UPDATED ENVIRONMENTAL MANAGEMENT PLAN FOR THE RENEWAL OF AN ENVIRONMENTAL CLEARANCE CERTIFICATE FOR MINING CLAIMS 70108, 70109, AND 70110, OMUSATI REGION

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CONSULTANT	PROPONENT
Impala Environmental consulting Unit 89, Auas Hill Village, Auas Blick, Windhoek Postal Address: P.O Box 29532, Windhoek, Namibia Tel: 061258910/0856630598 eia@impalac.com www.impalac.com	Twaya Investment CC 833 Okaramba Street, Wanahaeda, Windhoek, Namibia P.O Box 23772, Windhoek, Namibia Cell: +264811484477 eemosho@gmail.com

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Table of Contents

1. Project Background	3
1.1 Introduction	3
2. Summary of applicable legislation	6
2.1 Environmental Management Act of 2007	6
2.2 The Minerals Prospecting and Mining Act of 1992	6
2.3 Water Resources Management Act of 2004	6
2.4 Nature conservation ordinance, ordinance No. 4 of 1975	7
2.5 National Heritage Act, 2004 (Act No. 27 of 2004)	7
2.6 Petroleum Products and Energy Act No. 13 of 1990	7
2.7 Forest Act, No. 12 of 2001	8
2.8 Atmospheric Pollution Prevention Ordinance (1976)	8
2.9 Hazardous Substance Ordinance, No. 14 of 1974	9
2.10 Namibian Water Corporation (Act 12 of 1997)	9
3. Environmental Management Plan	10
3.1 Overview	10
3.2 Environmental Management Principles	10
3.3 Impacts on the Bio-physical Environment	12
3.3.1 Impacts on Archaeological Sites	12
3.3.2 Impacts on Fauna	13
3.3.3 Impacts on Avifauna	13
3.3.4 Impact on Vegetation	13
3.3.5 Impacts of Alien invasive Plants	14
3.3.6 Impacts on Socio-Economic	15
3.3.7 Visual Impacts	15
3.3.8 Use of Natural Resources	16
3.3.9 Generation of Solid Waste	16
3.3.10 Noise	16
3.3.11 Air Quality	16
3.4 Summary of Environmental Management Plan during construction, operation and decommissioning phases	17
3.5 Monitoring, Auditing and Reporting	20
3.5.1 Inspections and Audits	20
3.5.2 Environmental Management System Framework	22

4. Conclusion	25
5. References	26

List of Figures

Figure 1 A satellite imagery showing the orientation of the mining claims.....	3
Figure 3 Locality map of the exclusive prospecting licence area.....	5

1. Project Background

1.1 Introduction

The proponent, Twaya Investment CC, was granted mining claims 70108, 70109, and 70110, by the Ministry of Mines and Energy. The licence holder intends to continue with the establishment and mining of industrial minerals at Uundundu waNandjila Village, Ruacana Constituency, Omusati Region. An outline of the area is shown in the image below.



Figure 1 A satellite imagery showing the orientation of the mining claims.

Although mining is very costly, environmentally friendly mining is a cornerstone. The proponent believes that social and environmental responsibility is a prerequisite for providing a conducive environment for future mining activities.

An environmental impact assessment and environmental management plan (EMP) for the mining claims and its operations were completed and an environmental clearance certificate (ECC) was issued by the Ministry of Environment and Tourism. The proponent requires the renewal of the ECC and has requested Impala Environmental to assist with the process.

2. Summary of applicable legislation

All mineral rights, related to mineral exploration and mining activities in Namibia, are regulated by the Ministry of Mines and Energy whereas the environmental regulations are regulated by the Ministry of Environment and Tourism. The acts that affect the implementation, operation and management of mining activities in Namibia are shown below.

2.1 Environmental Management Act of 2007

Line Ministry: Ministry of Environment, Forestry and Tourism

The regulations that accompany this act lists several activities that may not be undertaken without an environmental clearance certificate issued in terms of the Act. The act further states that any clearance certificate issued before the commencement of the act (6 February 2012) remains in force for one year. If a person wishes to continue with activities covered by the act, he or she must apply for a new certificate in terms of the Environmental Management Act.

2.2 The Minerals Prospecting and Mining Act of 1992

Line Ministry: Ministry of Mines and Energy

The Minerals Prospecting and Mining Act No.33 of 1992 approves and regulates mineral rights in relation to exploration, reconnaissance, prospecting, small scale mining, mineral exploration, large-scale mining and transfers of mineral licences.

2.3 Water Resources Management Act of 2004

Line Ministry: Ministry of Agriculture, Water and Forestry

The act provides for the management, protection, development, usage and conservation of water resources; to provide for the regulation and monitoring of water resources and to provide for incidental matters.

2.4 Nature conservation ordinance, ordinance No. 4 of 1975

Line Ministry: Ministry of Environment and Tourism

The Nature Ordinance 4 of 1975 covers game parks and nature reserves, the hunting and protection of wild animals (including reptiles and wild birds), problem animals, fish, and the protection of indigenous plants. It also establishes a nature conservation board. The basic set of regulations under the ordinance is contained in GN 240/1976 (OG 3556). The topics covered in the regulations include tariffs (game parks), regulations relating to game parks, swimming baths, use of boats in game parks, inland fisheries, keeping game and other wild animals in capturing. In addition, the ordinance also regulates game dealers, game skins, protected plants, birds kept in cages, trophy hunting of hunt-able game, hunting at night, export of game and game meat, sea birds, private game parks, nature reserves, regulations of wildlife associations and registers for coyote getters.

2.5 National Heritage Act, 2004 (Act No. 27 of 2004)

Line Ministry/Body: National Heritage Council

The National Heritage Act provides for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.

2.6 Petroleum Products and Energy Act No. 13 of 1990

Line Ministry/Body: Ministry of Mines and Energy

The act regulates the importation and usage of petroleum products. The act reads as “To provide measures for the saving of petroleum products and an economy in the cost of the distribution thereof, and for the maintenance of a price thereof; for control of the furnishing of certain information regarding petroleum products; and for the rendering of services of a particular kind, or services of a particular standard; in connection with motor vehicles; for the establishment of the National Energy Fund and

for the utilization thereof; for the establishment of the National Energy Council and the functions thereof; for the imposition of levies on fuel; and to provide for matters incidental thereof”.

2.7 Forest Act, No. 12 of 2001

Line Ministry/Body: Ministry of Agriculture, Water and Forestry

The act regulates the cutting down of trees and reads as follows “To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of forests and forest produce; to provide for the protection of the environment and control and management of forest trees; to repeal the preservation of Bees and Honey proclamation 1923, preservation of Trees and Forests Ordinance, 1952 and the Forest Act, 1968; and to deal with incidental matters”.

The constitution defines the function of the Ombudsman and commits the government to sustainable utilization of Namibia’s natural resources for the benefit of all Namibians and describes the duty to investigate complaints concerning the over-utilization of living natural resources for the benefit of all Namibians and describes the duties to investigate complaints concerning the over-utilization of living natural resources, the irrational exploitation of non-renewable resources, the degradation and the destruction of ecosystem and failure to protect the beauty and character of Namibia. Article 95 states that *“the state shall actively promote and maintain the welfare of the people by adopting; inter-alia policies aimed at maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians both present and future”*.

2.8 Atmospheric Pollution Prevention Ordinance (1976)

Line Ministry/Body: Ministry of Health and Social Services

This ordinance provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, with the exception of

East Caprivi, is proclaimed as a controlled area for the purposes of section 4(1) (a) of the ordinance.

2.9 Hazardous Substance Ordinance, No. 14 of 1974

Line Ministry/Body: Ministry of Safety and Security

The ordinance provides for the control of toxic substances. It covers manufacture, sale, use, disposal and dumping as well as import and export. Although the environmental aspects are not explicitly stated, the ordinance provides for the importing, storage and handling.

2.10 Namibian Water Corporation (Act 12 of 1997)

Line Ministry/Body: Namibian Water Corporation

The act caters for water rehabilitation of prospecting and mining areas, environmental impact assessments and for minimising or preventing pollution.

3. Environmental Management Plan

3.1 Overview

This Environmental Management Plan is intended to give effect to the recommendations of the Environmental Impact Assessment. To achieve this goal, it is essential that all personnel involved on the mining activities are fully aware of the environmental issues and the means to avoid or minimize the potential impacts of activities on site. Legal and policy requirements are well known and understood by the proponent, its employees and contractors and will be strictly enforced by its management team.

Environmental management requires a joint effort on the part of all parties involved. The proponent has assigned certain roles to ensure that all players fulfil their responsibilities in this regard.

3.2 Environmental Management Principles

The proponent will ensure that all parties involved in the project uphold the following broad aims:

1. All persons will be required to conduct all their activities in a manner that is environmentally and socially responsible. This includes all consultants, contractors, and sub-contractors, transport drivers, guests and anyone entering the project areas.
2. Health, Safety and Social Well Being
 - Safeguard the health and safety of project personnel and the public against potential impacts of the project. This includes issues of road safety, precautions against natural dangers on site, and radiation hazards; and,
 - Promote good relationships with the local authorities and their staff.
3. Biophysical Environment
 - Wise use and conservation of environmental resources, giving due consideration to the use of resources by present and future generations;

- Prevent or minimise environmental impacts;
- Prevent air, water, and soil pollution, Biodiversity conservation and Due respect for the purpose and sanctity of the area.

To achieve these aims, the following principles need to be upheld.

A. Commitment and Accountability:

The proponent's senior executives and line managers will be held responsible and accountable for:

Health and safety of site personnel while on duty, including while travelling to and from site in company vehicles and environmental impacts caused by mining activities or by personnel engaged in the mining activities, including any recreational activities carried out by personnel in the area

B. Competence

The proponent will ensure a competent work force through appropriate selection, training, and awareness in all safety, health and environmental matters.

C. Risk Assessment, Prevention and Control

Identify, assess and prioritise potential environmental risks. Prevent or minimize priority risks through careful planning and design, allocation of financial resources, management and workplace procedures. Intervene promptly in the event of adverse impacts arising.

D. Performance and Evaluation

Set appropriate objectives and performance indicators. Comply with all laws, regulations, policies and the environmental specifications. Implement regular monitoring and reporting of compliance with these requirements.

E. Stakeholder Consultation

Create and maintain opportunities for constructive consultations with employees, authorities, other interested or affected parties. Seek to achieve

open exchange of information and mutual understanding in matters of common concern.

F. Continual Improvement

Through continual evaluation, feedbacks, and innovation, seek to improve performance about social health and well-being and environmental management throughout the lifespan of the mining project.

G. Financial Provisions for Mining

In line with Namibia's environmental rehabilitation policy, the proponent will make the necessary financial provision for compliance with the EMP.

3.3 Impacts on the Bio-physical Environment

3.3.1 Impacts on Archaeological Sites

The **nature of impact** is outlined below:

- Potential damage to archaeological sites as a result of vehicle tracks, footprints and actions of contractors, employees and visitors of the mining site.
- As the mitigation measures below are fully enforced, any impact will be significantly reduced compared to with present situation.

Mitigation Measures to be enforced:

- Buffer zones will be created around the sites.
- Adhere to practical guidelines provided by an archaeologist to reduce the archaeological impact of mining activities.
- All archaeological sites to be identified and protected before further exploration commences.
- Notices/information boards will be placed on sites.
- Training employees regarding the protection of these sites.

Methods for monitoring:

- An archaeologist will inspect any identified archaeological sites before commencing with the mining activities.

3.3.2 Impacts on Fauna

The **nature of impact** is outlined below:

- Movement of vehicles in and out of the site.
- Noise produced by moving earth-moving equipment.

Mitigation Measures to be enforced:

- Some habitat areas such as trees of the riverbeds and tunnels outcrops will be avoided wherever possible.
- A fauna survey will be conducted to determine the effect of fragmented habitat on game species should the need arise.
- No animals shall be killed, captured or harmed in any way.
- No foodstuff will be left lying around as these will attract animals which might result in human-animal conflict.
- Care will be taken to ensure that no litter is lying around as these may end up being ingested by wild animals
- No animals shall be fed. This allows animals to lose their natural fear of humans, which may result in dangerous encounters.

Methods for monitoring:

- Regular monitoring of any unusual signs of animal habitat.

3.3.3 Impacts on Avifauna

Birds or Nest sites will not be disturbed by any employee, visitor or contractor.

3.3.4 Impact on Vegetation

The **nature of impact** is outlined below:

- Negative impacts on plants from trenching, compacting and removal of plants.

- Negative Impact from movement of vehicles and the movement of people around the site.
- Negative impacts from land-clearing and mining operations.

Mitigation Measures to be enforced:

- Environmental considerations will always be adhered to before clearing roads, trenching and excavating.
- Paths and roads will be aligned to avoid root zones. Permeable materials will be used wherever possible.
- The movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive areas will be avoided.
- The movement of vehicles will be restricted to certain tracks only.
- Areas with species of concern will be avoided.
- Ministry of Environment and Tourism will be informed of any protected species which will be transplanted in consultation with MET.

3.3.5 Impacts of Alien invasive Plants

The **nature of impact** is outlined below:

- Plant or seed material may adhere to car tyres or animals
- Seed or plant material may be imported to site in building materials if the source is contaminated.
- Seeds may blow from debris removed at sites.

Mitigation Measures to be enforced:

- The miner will ensure that debris is properly disposed of.
- Vehicle tyre inspections can be carried out although this may not be a practical mitigation measure.
- Eradicating alien plants by using an Area Management Plan

Methods for monitoring:

- Regular monitoring of any unusual signs of alien species.

3.3.6 Impacts on Socio-Economic

The **nature of impact** is outlined below:

- Impact from loss of grazing for domestic livestock in “exclusive use zone”
- Impacts on cultural and spiritual values.
- Demographic factors: Attraction of additional population that cannot benefit from the project.
- Perception of Health and Safety risks associated with mining.

Mitigation Measures to be enforced:

- The population change can be mitigated by employing people from the local community and encouraging the contractors to employ local individuals.
- The perception of risks will be mitigated by putting up safety signs wherever possible and ensuring that all employees and visitors to the site undergo a safety induction course.

Methods for monitoring:

- Public meetings will be held by the proponent whenever necessary.

3.3.7 Visual Impacts

The **nature of impact** is outlined below:

- Tracks and damaged vegetation caused by the mining vehicles.

Mitigation Measures to be enforced:

- Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating.

Methods for monitoring:

- Employees will be trained on the importance of minimising visual impacts.

3.3.8 Use of Natural Resources

Water and electricity are very scarce in Namibia. During the exploration, best international practices will be considered as a minimum standard for operation. The bulk of the power supply to the exploration site will be sourced from the proponent's own generator. The proponent will maximise water recycling opportunities wherever possible.

3.3.9 Generation of Solid Waste

Correct management of solid waste will involve a commitment to the full waste life cycle by all the employees and contractors of the site. The Proponent's goal is to avoid the generation of solid waste in the first place and if not possible, to minimise the volumes generated by looking at technologies that promote longevity and recycling of products. Ideally, the proponent should transport solid waste to a registered site for disposal. However, it is not certain if such facilities are available in the area or if they have the capacity to handle large increases in volume. Appropriate on-site facilities will be designed to store large volumes of waste.

3.3.10 Noise

The **nature of impact** is outlined below:

- Movement of people, and vehicles.
- Noise may be generated from an airborne geophysical survey which may be carried out at a later stage.

Mitigation Measures to be enforced:

- Disturbance to fauna that roam the area will be minimized by training the employees on ways to minimise noise.

3.3.11 Air Quality

The **nature of impact** is outlined below:

- Dust from movement of people, vehicles and earth-moving machinery. Emissions from vehicles and drill rigs as well.

Mitigation Measures to be enforced:

- All staff on should be equipped with dosimeters that measure exposure levels to radiation.
- All staff must be made aware of the health risk and obliged to wear dust masks.

3.4 Summary of Environmental Management Plan during construction, operation and decommissioning phases

Construction/Initial Phase			
Environmental Impact	Proposed mitigation measures	Responsibility	Monitoring plan
Air pollution	<ul style="list-style-type: none"> • Control speed and operation of construction vehicles. • Prohibit idling of vehicles. • Maintenance of vehicles and equipment. • Sensitize field exploration workers and contractors. • Workers should be provided with dust masks if working in sensitive areas. 	<ul style="list-style-type: none"> • Contractor • Site Manager 	<ul style="list-style-type: none"> • Amount of dust produced. • Level of Landscaping carried out.
Noise pollution	<ul style="list-style-type: none"> • Maintain equipment and vehicles. • Field work should only be carried out only during daytime i.e. 08h00 to 17h00. • Workers should wear earmuffs if working in noisy section. • Management to ensure that noise is kept within reasonable levels. 	<ul style="list-style-type: none"> • Contractor • Management 	Amount of noise
Solid waste	<ul style="list-style-type: none"> • Any debris should be collected by a waste collection company • If trenches are dug, waste should be re-used or backfilled. • The site should have waste receptacles with bulk storage facilities at convenient points to prevent littering during mining. 	<ul style="list-style-type: none"> • Management 	Presence of well-Maintained receptacles and central collection point.
Oil leaks and spills	<ul style="list-style-type: none"> • Vehicles and equipment should be well maintained to prevent oil leaks. • Contractor should have a designated area where maintenance is carried out and that is protected from rainwater. • All oil products should be handled carefully. 	<ul style="list-style-type: none"> • Contractor 	No oil spills and leaks on the site
First aid	<ul style="list-style-type: none"> • A well-stocked first aid kit shall be maintained by qualified personnel 	<ul style="list-style-type: none"> • Management 	Contents of the first aid kit.
Visual	<ul style="list-style-type: none"> • Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating. 	<ul style="list-style-type: none"> • Management 	<ul style="list-style-type: none"> • Employees will be trained on the importance of minimising visual impacts.
Archaeological Sites	<ul style="list-style-type: none"> • Buffer zones will be created around the sites. • Adhere to practical guidelines provided by an archaeologist to reduce the archaeological impact of mining activities. • All archaeological sites to be identified and protected before further mining commences. 	<ul style="list-style-type: none"> • Management 	<ul style="list-style-type: none"> • Register of all archaeological sites identified.

Occupational Health and Safety	<ul style="list-style-type: none"> • Provide Personal Protective Equipment • Train workers on personal safety and how to handle equipment and machines. • A well-stocked first aid kit shall be maintained by qualified personnel. • Report any accidents / incidences and treat and Compensate affected workers. • Provide sufficient and suitable sanitary conveniences which should be kept clean. 	<ul style="list-style-type: none"> • Contractor • Management 	<ul style="list-style-type: none"> • Workers using Protective Equipment. • Presence of Well stocked First Aid Box. • Clean sanitary facilities.
Fauna	<ul style="list-style-type: none"> • Some habitat areas such as trees of the riverbeds and tunnels outcrops will be avoided wherever possible. • A fauna survey will be conducted to determine the effect of fragmented habitat on game species should the need arise. • No animals shall be killed, captured or harmed in any way. • No foodstuff will be left lying around as these will attract animals which might result in human-animal conflict. 	<ul style="list-style-type: none"> • Management 	<ul style="list-style-type: none"> • Regular monitoring of any unusual signs of animal habitat.
Alien Invasive Plants	<ul style="list-style-type: none"> • The miner will ensure that debris is properly disposed off. • Vehicle tyre inspections can be carried out although this may not be a practical mitigation measure. • Eradicating alien plants by using an Area Management Plan 	<ul style="list-style-type: none"> • Management • Contractor 	<ul style="list-style-type: none"> • Regular monitoring of any unusual signs of alien species.
Loss of vegetation	<ul style="list-style-type: none"> • Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating. • Paths and roads will be aligned to avoid root zones. Permeable materials will be used wherever possible. • The movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive areas will be avoided. • The movement of vehicles will be restricted to certain tracks only. 	<ul style="list-style-type: none"> • Contractor • Management 	<ul style="list-style-type: none"> • Warning signs on site • restored vegetation
Operational Phase			
Environmental/ Social Impact	Proposed mitigation measures	Responsibility	Monitoring plan
Noise pollution	<ul style="list-style-type: none"> • Maintain vehicles and drilling equipment. • Workers to wear earmuffs if working in noisy section • Management to ensure that noise is kept within reasonable levels. 	<ul style="list-style-type: none"> • Contractor • Management 	<ul style="list-style-type: none"> • Amount of noise
Visual	<ul style="list-style-type: none"> • Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating. 	<ul style="list-style-type: none"> • Management 	<ul style="list-style-type: none"> • Employees will be trained on the importance of minimising visual impacts.

Fauna	<ul style="list-style-type: none"> Some habitat areas such as trees of the riverbeds and tunnels outcrops will be avoided wherever possible. A fauna survey will be conducted to determine the effect of fragmented habitat on game species should the need arise. No animals shall be killed, captured or harmed in any way. No foodstuff will be left lying around as these will attract animals which might result in human-animal conflict. 	<ul style="list-style-type: none"> Management 	<ul style="list-style-type: none"> Regular monitoring of any unusual signs of animal habitat.
Alien Invasive Plants	<ul style="list-style-type: none"> The miner will ensure that debris is properly disposed of. Vehicle tyre inspections can be carried out although this may not be a practical mitigation measure. Eradicating alien plants by using an Area Management Plan 	<ul style="list-style-type: none"> Management Contractor 	<ul style="list-style-type: none"> Regular monitoring of any unusual signs of alien species.
Loss of vegetation	<ul style="list-style-type: none"> Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating. Paths and roads will be aligned to avoid root zones. Permeable materials will be used wherever possible. The movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive areas will be avoided. The movement of vehicles will be restricted to certain tracks only. 	<ul style="list-style-type: none"> Contractor Management 	<ul style="list-style-type: none"> Warning signs on site restored vegetation
Solid waste	<ul style="list-style-type: none"> Minimize solid waste generated on site. Recycle waste especially waste from trenching. Debris should be collected by waste collection company. Excavation waste should be re-used or backfilled. 	<ul style="list-style-type: none"> Contractor Management 	<ul style="list-style-type: none"> Amount of waste on Site Presence of well-Maintained receptacles and central collection point.
Oil leaks and spills	<ul style="list-style-type: none"> Machinery should be well maintained to prevent oil leaks. Contractor should have a designated area where maintenance is carried out and that is protected from rainwater. All oil products should be stored in a site store and handled carefully. 	<ul style="list-style-type: none"> Contractor 	<ul style="list-style-type: none"> No oil spills and leaks on the site.
Archaeological Sites	<ul style="list-style-type: none"> Buffer zones will be created around the sites. Adhere to practical guidelines provided by an archaeologist to reduce the archaeological impact of mining activities. All archaeological sites to be identified and protected before further mining commences. 	<ul style="list-style-type: none"> Management 	<ul style="list-style-type: none"> Update Register of all archaeological sites identified.
First aid	<ul style="list-style-type: none"> A well-stocked first aid kit shall be maintained by qualified personnel 	<ul style="list-style-type: none"> Management 	<ul style="list-style-type: none"> Contents of the first aid kit.
Fire preparedness	<ul style="list-style-type: none"> Firefighting drills carried out regularly. Firefighting emergency response plan. Ensure all firefighting equipment are regularly maintained, serviced and inspected. Fire hazard signs and directions to emergency exit, route to follow and assembly point in case of any fire incidence. 	<ul style="list-style-type: none"> Management 	<ul style="list-style-type: none"> Number of fire drills carried. Proof of inspection on firefighting equipment.

			<ul style="list-style-type: none"> • Fire Signs put up in strategic places. • Availability of firefighting equipment.
Environment Health and Safety	<ul style="list-style-type: none"> • Train workers on personal safety and disaster preparedness. • A well-stocked first aid kit shall be maintained by qualified personnel. • Report any accidents / incidences and treat and compensate affected workers. • Provide sufficient and suitable sanitary conveniences which should be kept clean. • Conduct Annual Health and Safety Audits. 	<ul style="list-style-type: none"> • Management 	<ul style="list-style-type: none"> • Provide sanitary facilities. • Copies of Annual Audit
	Decommissioning Phase		
Environmental/Social Impact	Proposed mitigation measures	Responsibility	Monitoring plan/indicator
Noise & Air pollution	<ul style="list-style-type: none"> • Maintain plant equipment. • Decommissioning works to be carried out only during daytime. • Workers working in noisy section to wear earmuffs. • Workers should be provided with dust masks. 	<ul style="list-style-type: none"> • Contractor • Management 	<ul style="list-style-type: none"> • Amount of noise
Disturbed Physical environment	<ul style="list-style-type: none"> • Undertake a complete environmental restoration programme and introducing appropriate vegetation 	<ul style="list-style-type: none"> • Management 	
Solid waste	<ul style="list-style-type: none"> • Solid waste should be collected by a contracted waste collection company • Excavation waste should be re-used or backfilled. 	<ul style="list-style-type: none"> • Contractor • Management 	<ul style="list-style-type: none"> • Amount of waste on Site. • Presence of well-maintained receptacles and central collection point.
Occupational Health and Safety	<ul style="list-style-type: none"> • Provide Personal Protective Equipment. • Train workers on personal safety and how to handle equipment and machines. • A well-stocked first aid kit shall be maintained by qualified personnel. • Demarcate area under decommissioning. 	<ul style="list-style-type: none"> • Contractor 	<ul style="list-style-type: none"> • Workers using Protective Equipment. • Presence of a First Aid Box.

3.5 Monitoring, Auditing and Reporting

3.5.1 Inspections and Audits

During the life of the project, performance against the EMP commitments will need to be monitored, and corrective action taken where necessary, in order to ensure compliance with the EMP and relevant enviro-legal requirements.

3.5.1.1 Internal Inspections/Audits

The following internal compliance monitoring programme will be implemented:

1. Project kick-off and close-out audits will be conducted on all contractors. This applies to all phases, including drilling contract work during operations:
 - Prior to a contractor beginning work, an audit will be conducted by the applicable phase site manager to ensure that the EMP commitments are included in Contractors' standard operating procedures (SOPs) and method statements.
 - Following completion of a Contractors work, a final close-out audit of the contractor's performance against the EMP commitments will be conducted by the applicable phase site manager.
2. Monthly internal EMP performance audits will be conducted during the construction/initial and decommissioning phases.
3. Ad hoc internal inspections can be implemented by the applicable phase mining manager at his/her discretion, or in follow-up to recommendations from previous inspection/audit findings.

3.5.1.2 External Audits

- At the close of each project phase, and annually during the operational phase, an independently conducted audit of EMP performance will be conducted.
- Specialist monitoring/auditing may be required where specialist expertise are required or in order to respond to grievances or authorities directives.
- Officials from the DEA may at any time conduct a compliance and/or performance inspection of mining operations. The proponent will be provided with a written report of the findings of the inspection. These audits assist with the continual improvement of the mining project and the proponent will use such feedback to help improve its overall operations.

3.5.1.3 Documentation

Records of all inspections/audits and monitoring reports will be kept in line with legislation. Actions will be issued on inspection/audit findings. These will be tracked and closed out.

3.5.1.4 Reporting

Environmental compliance reports will be submitted to the Ministry of Environment and Tourism on a bi-annual basis.

3.5.2 Environmental Management System Framework

In order implement Environmental Management Practices, an Environmental Management System (EMS) will be established and implemented by the proponent and their Contractors. This subchapter establishes the framework for the compilation of a project EMS. The applicable mining manager will maintain a paper based and/or electronic system of all environmental management documentation. These will be divided into the following main categories:

3.5.2.1 Policy and Performance Standards

A draft environmental policy and associated objective, goals and commitments has been included in the EMP. The mineral explorer may adapt these as necessary.

3.5.2.2 Enviro-Legal Documentation

A copy of the approved EMP documentation will always be made available by the proponent. Copies of the Environment Clearance Certificate and all other associated authorisations and permits will also be kept with the mining team. In addition, a register of the legislation and regulations applicable to the project will be maintained and updated as necessary.

3.5.2.3 Impact Aspect Register

A register of all project aspects that could impact the environment, including an assessment of these impacts and relevant management measures, is to be maintained. This Draft EMP identifies the foreseeable project aspects and related potential impacts of the proposed project, and as such forms the basis for the Aspect-Impact Register; with the Project Activity. It is however noted that during the life of the project additional project aspects and related impacts may arise which would need to

be captured in the Aspect-Impact Register. In this regard, the impact identification principles set forth in the scoping report can be used to update the Register. This method can be modified as required by the applicable mining manager as necessary during the life of the project.

3.5.2.4 Procedures and Method Statements

In order to affect the commitments contained in this EMP, procedures and method statements will be drafted by the relevant responsible mining staff and Contractors. These include, but may not be limited:

- Standard operating procedures for environmental action plan and management programme execution.
- Incident and emergency response procedures.
- Auditing, monitoring and reporting procedures, and
- Method statements for EMP compliance for ad hoc activities not directly addressed in the EMP action plans.

All procedures are to be version controlled and signed off by the applicable mining manager. In addition, knowledge of procedures by relevant staff responsible for the execution thereof must be demonstrable and training records maintained.

3.5.2.5 Register of Roles and Responsibilities

During project planning and risk assessments, relevant roles and responsibilities will be determined. These must be documented in a register of all environmental commitment roles and responsibilities. The register is to include relevant contact details and must be updated as required.

3.5.2.6 Site Map

An up to date map of the mining site indicating all project activities is to be maintained. In addition to the project layout, the following detail must be depicted:

- Materials handling and storage;
- Waste management areas (collection, storage, transfer, etc.);
- Sensitive areas;

- Incident and emergency equipment locations; and Location of responsible parties.

3.5.2.7 Environmental Management Schedule

A schedule of environmental management actions is to be maintained by the applicable phase site managers and/or relevant Contractors. A master schedule of all such activities is to be kept up to date by the mining manager. Scheduled environmental actions can include, but are not limited to:

- Environmental risk assessment;
- Environmental management meetings;
- Soil handling, management and rehabilitation;
- Waste collection
- Incident and emergency response equipment evaluations and maintenance
- Environmental training;
- Stakeholder engagement; Environmental inspections; and
- Auditing, monitoring and reporting.

3.5.2.8 Change Management

The EMS must have a procedure in place for change management. In this regard, updating and revision of environmental documentation, of procedures and method statements, actions plants etc. will be conducted as necessary in order to account for the following scenarios:

- Changes to standard operating procedures (SOPs);
- Changes in scope;
- Ad hoc actions;
- Changes in project phase; and
- Changes in responsibilities or roles

All documentation will be version controlled and require sign off by the applicable phase site managers.

4. Conclusion

The updated environmental management plan is prepared for the establishment and mining of industrial minerals on mining claims; 70108, 70109, 70110 situated at Uundundu waNandjila Village, Ruacana Constituency, Omusati Region. The review of the Environmental Management Plan found it practical and efficient towards the improvement of environmental sustainability.

The EMP contains a set of Environmental Specifications that will form part of all contracts between the proponent and contractors such as drilling companies. The requirements of the EMP will be enforced on site by the Management team, and periodic environmental audits will be undertaken and submitted to MET.

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