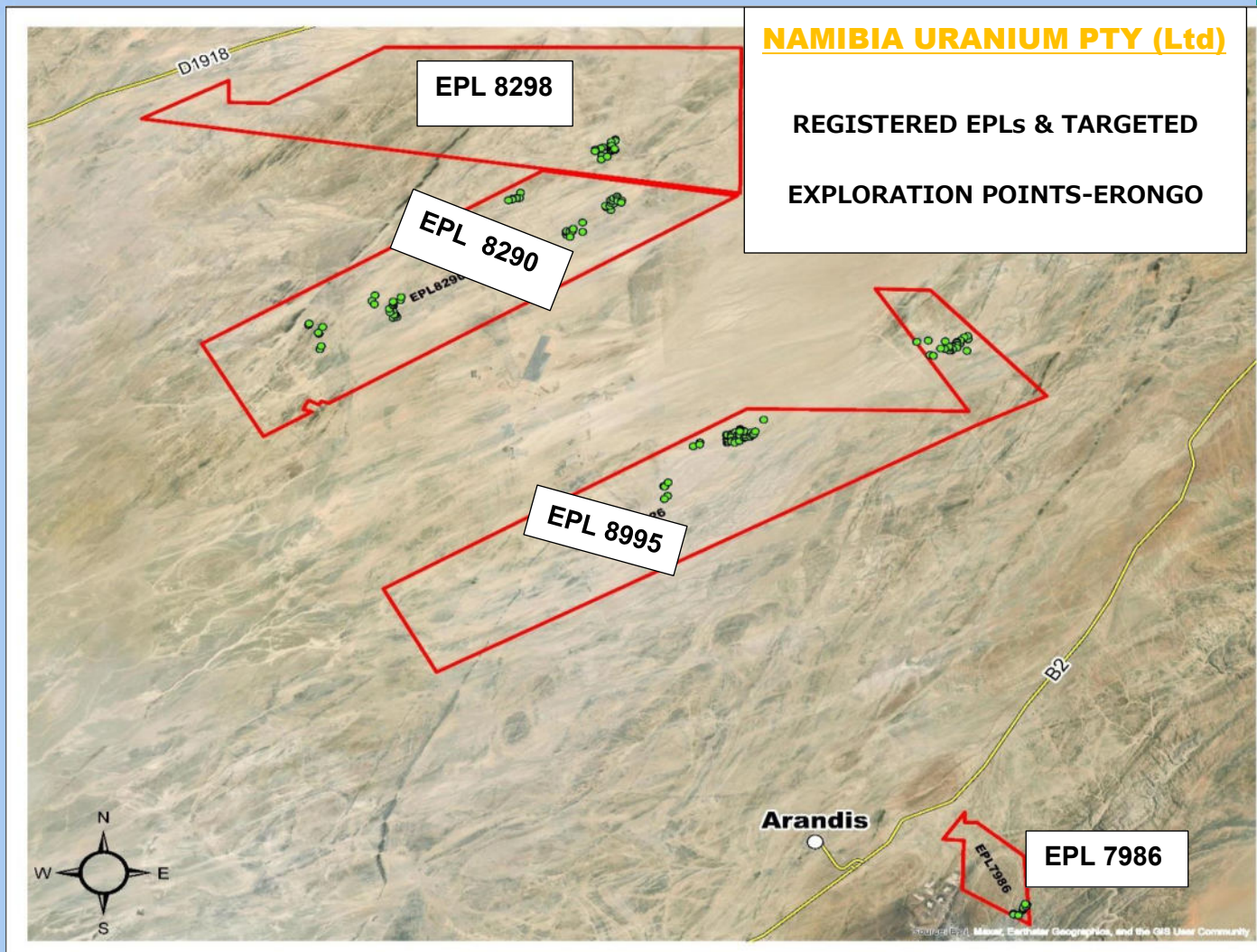


The Proposed Mineral Exploration Activities on EPL 7986, Arandis, Erongo Region - Namibia

Updated Environmental Management Plan

Version-Final for submission

MEFT APP-5719



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RENEWAL AND AMENDMENT OF ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED MINERAL EXPLORATION ACTIVITIES ON EPL 7986, ARANDIS, ERONGO REGION -NAMIBIA

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Acronyms

TERMS	DEFINITION
BID	Background Information Document
EAP	Environmental Assessment Practitioners
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
GHG	Greenhouse Gasses
ISO	International Organization for Standardization
I&Aps	Interested and Affected Parties
MEFT: DEA	Ministry of Environment, Forestry and Tourism's Directorate of Environmental Affairs

DEFINITION OF TERMS

The '**Consultant**' – this refers to the team that is conducting the ESIA and the preparation of the EMP for the development

The '**Proponent**' – this refers to the institutions/departments that are directly involved in the implementation of the project, i.e., Namibia Uranium Pty (Ltd).

The '**Stakeholders**' – this refers to the people, organisations, NGOs that are directly or indirectly affected and interested by the project.

The '**Environment**' – this refers to the ecology, economy, society and politics.

1. CHAPTER ONE: BACKGROUND

1.1. INTRODUCTION

Namibia Uranium PTY (Ltd) (project proponent) has identified the dire need for mineral exploration and mining for economic development in Namibia. In this respect the proponent has taken on a venture to explore for Base and Rare Metals, Industrial Minerals, Non-Nuclear Fuel Minerals, Precious Metals and Precious Stones Groups of minerals on EPL 7986 in Arandis. The proposed venture is also in line with the Fourth National development plan-Namibia, by creating employment and targeting value additions of local resources before export to other countries.

Mining is a prescribed activity under the Environmental Management Act (2007) that requires an environmental impact assessment to be carried out before project implementation. In this respect, the proponent intends to conduct exploration activities and identify existence of minable minerals in the area and in compliance with Namibian environmental legislation.

In 2022, an Environmental Scoping Assessment (ESA) was conducted by **Junior Baiano Industrial Consultants (JBIC) cc** to authorize the listed activities triggered by the project in terms of the Environmental Management Act (EMA), 2007, the EIA Regulations – 2012, the EIA policy of 1995 and international environmental treaties and conventions binding Namibia.

According to the Environmental Management Act (2007) and its Regulations (2012) the existing development requires an Environmental Clearance Certificate as specified in the following sections of the Act shown in Table 1: Listed Activities relevant to the project below:

Table 1: Listed Activities relevant to the project

ACTIVITY	RELEVANT SECTIONS
MINING AND QUARRYING ACTIVITIES	<p>- 3.1 The construction of facilities for any process or activities which requires a licence, right or other form of authorisation, and the renewal of a licence, right or other form of authorisation, in terms of the Minerals (Prospecting and Mining Act), 1992.</p> <p>-3.2 Other forms of mining or extraction of any natural resources whether regulated by law or not.</p> <p>-3.3 Resource extraction, manipulation, conservation and related activities.</p>

In respect to the commissioning of the mineral exploration activities, **Enviroplan consulting cc** has been appointed by the proponent to conduct an Environmental Audit and renewal of Environmental Clearance certificate (ECC). The consultant is hereby updating the previous approved Environmental Management Plan (EMP) for the undertaking of mineral exploration activities. The Directorate of Environmental Affairs under the Ministry of Environment, forestry and Tourism-Namibia will review the application.

1.2. PROJECT LOCATION

The proposed project will be undertaken on EPL 7986 in Arandis - Erongo Region-Namibia. The EPL is located 6km east of Arandis Town and 2 km north of Rossing Uranium mine, Erongo region Namibia. The exact target waypoints of exploration sites coordinates are as presented on table 2 below, and the geological sampling points are presented as figure overleaf. EPL boundary is depicted on figure 2.

Table 2: Waypoints (Target points)

Target points	Coordinates
A	-22.458127, 15.073486
B	-22.458746, 15.073584
C	-22.459074, 15.075972
D	-22.456243, 15.078148
E	-22.455433, 15.078349
F	-22.455036, 15.078387
G	-22.454282, 15.079776
H	-22.453246, 15.080159
I	-22.452799, 15.079364

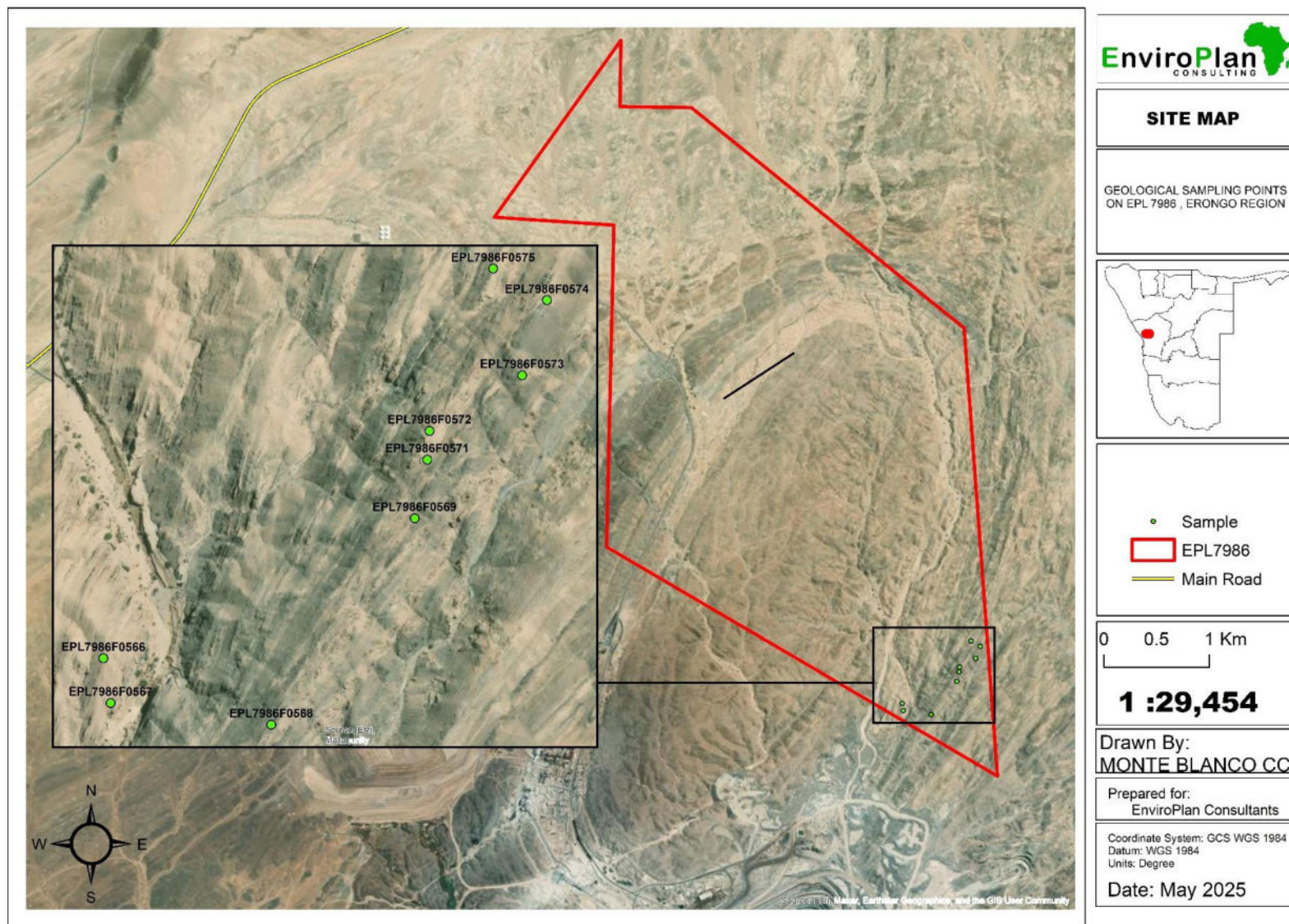


Figure 1: Geological sampling points on EPL 7986

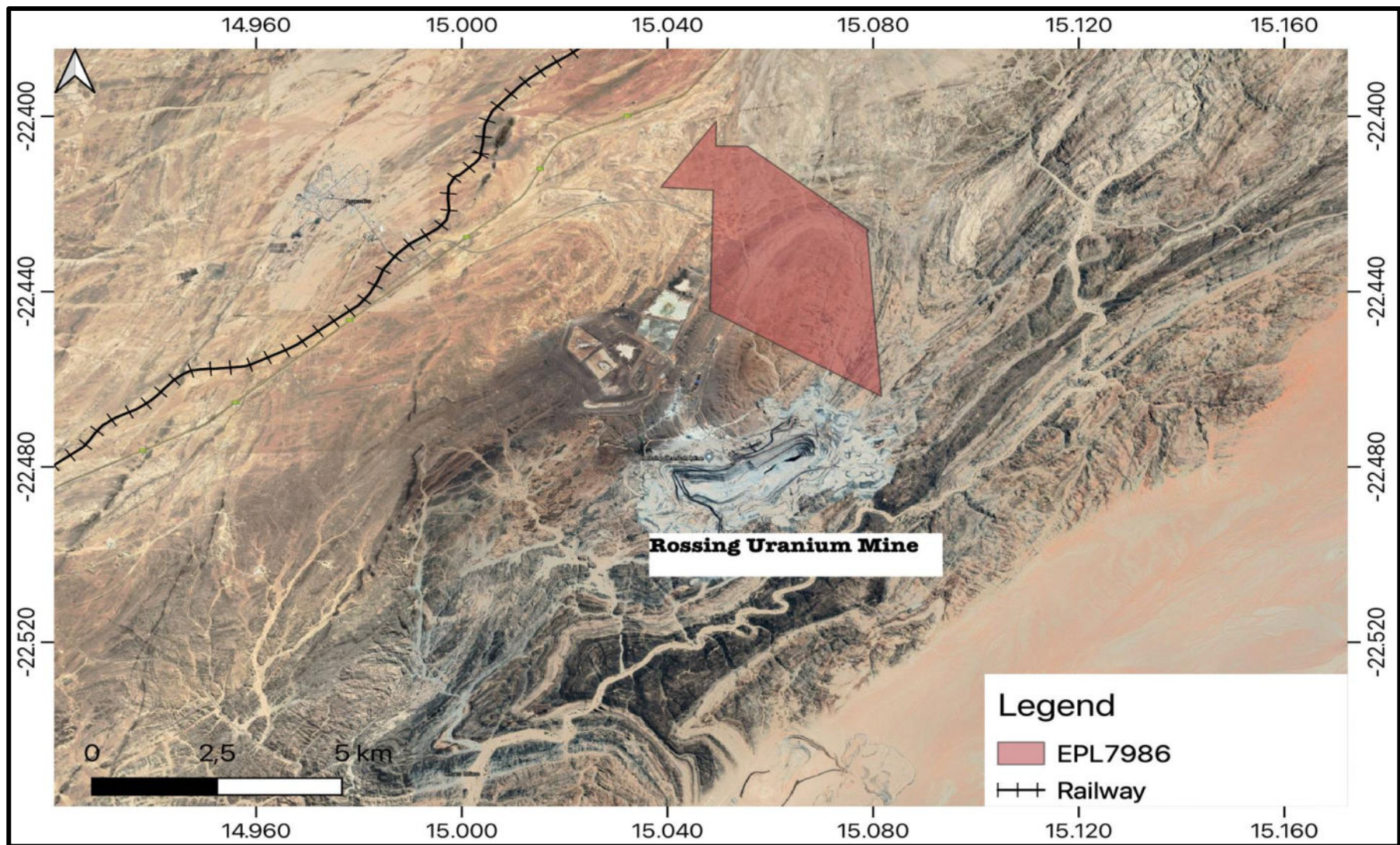


Figure 2: Proposed Project Site

1.3. PURPOSE OF THE ENVIRONMENTAL MANAGEMENT PLAN (EMP)

This updated Environmental Management Plan (uEMP) has been developed for the mineral exploration activities proposed to be conducted on EPL 7986. It forms the operational framework within which the proposed mineral exploration activities will be conducted. All anticipated environmental and social impacts identified in the environmental scoping report are addressed, with a mitigation action, monitoring requirements, key indicator and responsibilities.

This uEMP is continuous, and it requires compliance monitoring, updating and or amendment if the scope of operations change. All personnel working on the project will be legally required to comply with the standards set out in this uEMP.

This section describes the Environmental Management Plan for impacts associated with the proposed development. The EMP stipulates the management of environmental programs in a systematic, planned and documented manner. The EMP below includes the organizational structure, planning and monitoring for environmental protection at the proposed farm area development and other areas of its influence. The aim is to ensure that the proponent maintains adequate control over the project operations to:

- *To prevent negative impacts where possible;*
- *Reduce or minimise the extent of impact during project life cycle;*
- *Prevent long-term environmental degradation.*
- *Ensure public safety and health is protected*

1.4. LEGAL AND OTHER REQUIREMENTS COMPLIANCE

This report presents the EMP and has been undertaken in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and the Environmental Assessment regulations of 2012. As such, key requirements in accordance with this Act classify the proposed project as listed and invoke the need for an environmental management plan to sustainably implement this project. However, legal compliance is not only limited to the EMA, but also applies to all applying legal requirements identified in the ESR. When licenses are required such as wastewater discharge, the proponent should ensure that all licenses and permits are obtained and fulfilled as per conditions.

1.5. THE EMP ADMINISTRATION

There is a strong need to clearly outline the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. There is also a need for the proponent to appoint

an overall responsible person (Environmental Control Officer) to ensure the successful implementation of the EMP.

It solely remains the responsibility of Namibia Uranium to ensure the following;

- That all members of the project team, including contractors, comply with the procedures set out in this EMP;
- That all personnel are provided with sufficient training, supervision, and instruction to fulfil this requirement; and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

Table 3: Roles and Responsibilities in EMP Implementation

ROLE	ENVIRONMENTAL RESPONSIBILITIES
Namibia Uranium	Responsible to enforce EMP implementation to contractors
Environmental Control Officer	<p>Implement, review and update the EMP.</p> <ul style="list-style-type: none"> • Ensure all reporting and monitoring required under EMP is undertaken, documented and distributed as needed • Conduct environmental site training (tool box talks) and inductions with the support of an environmental consultant. • Conducts environmental audit at work site with the support of environmental consultant. • Close out all non-conformances. • Ensure materials being used on site are environmentally friendly and safe.
The Department of Environmental Affairs	<p>Approve the uEMP and any amendments to the EMP.</p> <ul style="list-style-type: none"> • Approve reports of environmental issues and non-conformances as issued. • Review and approve environmental reports submitted as part of EMP implementation
Exploration Manager	<p>Control and monitor actions required by the EMP.</p> <ul style="list-style-type: none"> • Report all environmental issues to HSE Manager. • Ensure documented procedures are followed and records kept on site. • Ensure any complaints are passed onto the management within 24 hours of receiving the complaint.
Employees	<p>Follow requirements as directed by site engineers.</p> <ul style="list-style-type: none"> • Report any potential environmental issues to site engineer/project manager, indicating spilt oil, excess waste, excessive dust generation, dirty water running off the site and other possible non-conformances

2. CHAPTER TWO: ENVIRONMENTAL AND SOCIAL MANAGEMENT

Table 4: Exploration EMP

Impact	Description	Mitigation/ Management Action	Monitoring Requirements	Responsibility
Camp Set up and Drilling Phase Impacts				
Noise pollution	Noise will be generated through: -Access roads upgrading -Exploration drilling activities -Exploration camp construction.	- A drilling interval will be established, used and adhered to. - Workers will be issued ear plugs to protect them from excessive noise. - Public will be notified through printed timetable stating planned operational activities. - Construction activities will be conducted during daytime. -Site notices will be erected on and around the site notifying visitors and nearby residents of different hazards on site.	-Daily Observations -Monthly Monitoring	Exploration Manager
Dust Generation	Dust will accumulate because of the land preparation, onsite movements of vehicles and machines, wind blowing on loose material during construction and tipping.	- Dust suppression will be done through watering dust sources surfaces. -Watering down dusty surfaces, -Ensure that protective equipment such as respirators are distributed to employees, and ensure their use. -Site notices to be erected on and around the site to inform visitors and surrounding residents. -Fallout dust monitoring will be conducted	-Daily Observations -Monthly Monitoring	Exploration Manager
Loss of Biodiversity	-Vegetative plants on site will be removed -Habitat destruction for both ground dwelling species and tree dwelling species.	- There is need to ensure that endemic species in the area are not affected, both fauna and flora, however no endemic species have been observed on site yet. -Indiscriminate clearing of land is highly discouraged and land to be cleared should be land intended for activities.	-Daily Observations -Monthly Monitoring	Exploration Manager

Impact	Description	Mitigation/ Management Action	Monitoring Requirements	Responsibility
	-Soil disturbance on and around the site.	<p>- All the major trees will be preserved and the operational activities will fit into the environment without affecting the trees.</p> <p>-Upon completion of drilling activities more trees and lawn will be planted on and around the site to restore the site into a status that is environmentally friendly.</p> <p>-When necessary, a permit must be obtained from the Directorate of Forestry before removing a major tree species.</p>		
Greenhouse gas emissions	<p>Green House Gasses (GHGs) emissions will be produced from the following activities:</p> <ul style="list-style-type: none"> Fuels combustion for transport (construction vehicles and equipment) Ground excavation releases phosphorus found underground and releases particulate matter into the atmosphere. 	<p>-Adopt the use of ethanol blended fuels wherever necessary.</p> <p>-Design an operation system that cuts on fuel consumption.</p> <p>- Use of solar energy system during construction for lighting and other minor energy needs.</p>	-Daily Observations	Exploration Manager
Pollution from drilling activities	Drilling is associated with a use of machinery and material supplements on site	- Ensure that all waste from drilling activities is stored and contained in designated containers and transported to the nearby waste disposal site.	<p>-Daily Observations</p> <p>-Borehole and Surface water</p>	Exploration Manager

Impact	Description	Mitigation/ Management Action	Monitoring Requirements	Responsibility
		<ul style="list-style-type: none"> -Adequate mobile toilets must be provided at the exploration camps for the use of the workers. -Waste bins will be put on site and regularly emptied to handle domestic waste. 	monthly monitoring (level and quality)	
Hydro-carbons release into the environment	There will be no storage of oils and fuel on site, however there is risk of spillage of hydrocarbons from vehicles and machinery operations, maintenance through leakages and spillages which may result in environmental contamination	<ul style="list-style-type: none"> -Implement a maintenance programme to ensure all vehicles, machinery and equipment are remain in proper working order -Vehicle maintenance should be Conducted in designated areas only, preferably off-site. -Waste oil, fuels and other chemicals from drip trays on stationery vehicles and machinery will be disposed of as hazardous waste at a licensed facility by a specialist hazardous waste handler. -Oil residue will be treated with oil absorbent material such as Drizit or bio-remediation and removed to an approved waste disposal site -No bins containing organic solvents such as paint and thinners shall be cleaned on site, unless containers for liquid waste disposal are provided on site. 	-Daily Observations	Exploration Manager
Safety and Health risks	Mining related Safety and Health hazards	<ul style="list-style-type: none"> - Equip workers with Personal Protective Equipment (PPE), provide trainings on how to effectively use the PPE. -Provide platforms for briefings and meetings about possible safety and health hazards in the work place -Provide site signs warning and informing about different hazards on site. 	-Daily Observations	Exploration Manager
Population Influx	The project will bring in skilled and unskilled	-Train and brief employees to respect local cultures and leaders,	-Daily Observations	Exploration Manager

Impact	Description	Mitigation/ Management Action	Monitoring Requirements	Responsibility
	workforce into Arandis area from other places increasing population density in the area.	-Engage on massive sexual health training and awareness and providing contraceptives such as condoms, as well as provide means counselling for those that are affected by HIV/AIDS and other STDs, - Provide environmental trainings and continue a regular basis briefing the employees about nature conservation (animal and plants), and discourage indiscriminate vegetation clearance.		
Employment creation	The proposed project provides an opportunity of outsourcing work	- Work with local leadership (councillor) on acquiring non-skilled labour from the residents.	-Daily Observations	Exploration Manager
Business linkages	-Raw materials acquiring and contracting companies provide an opportunity for businesses.	-The proponent will outsource most of its materials and services from the surrounding areas.	-Daily Observations	Exploration Manager
Infrastructure development	The development presents a unique opportunity for infrastructure development in Arandis	-Development such as road upgrading will not only be limited up until the project site, but it will be extended to service other residents as well.	-Daily Observations	Exploration Manager

3. ENVIRONMENTAL MANAGEMENT PROGRAMME

3.1. OVERVIEW

The following management plans need to be implemented during the exploration and rehabilitation phase of the proposed mineral exploration activities.

- Exploration Management Plan;
- Rehabilitation Plan; and

Many of the issues to be addressed in these plans are regulated in existing laws, regulations and guidelines. In addition, it is recognized that the content of several plans will be generic, in the sense that existing procedures are documented in standard code of practice, and that adaption of such generic plans will only be possible as a dynamic process during the mineral exploration phase.

3.1.1. THE CURRENT STAGE OF DEVELOPMENT

The project proponent did reconnaissance work to determine the reserves underlying within the EPL. This was done after the first ECC was issued in the year 2022. The Environmental consultant made a site visit for compliance audit and hereby testify that the project proponent established an access road through the EPL.

Creation of access routes and haul tracks: There are existing sandtracks leading to the EPL from Arandis. Apart from these existing sand tracks and service roads network leading to target areas, additional tracks may be created. Additional roadways may be considered for the purposes of accessing target sites. Where deemed necessary, graveling, and compaction of vehicle track's surfaces may be considered to allow for less track maintenance and seam less flow of traffic. No roads of bitumen standard exist in the EPL area. No permanent structures will be built for exploration works. Figure 3 overleaf shows an access road to different target points within the EPL.



Figure 3: Access Road accessing target points within EPL 7986

Activities to be carried on the EPL Explorations comprise various phases. For the Environmental assessment done, the phase-based activities were categorized to enable impact assessment and analysis. The different project sections are as follows:

3.1.2. EXPLORATION PHASE

The exploration team will undertake initial site visits to identify appropriate sites for the establishment of field

camps. The field camps are for the safe keep of exploration equipment and vehicles before use. No employees will be housed in the EPL. Site preparation activities will begin once surface drainage and ground water conditions are understood by. Exploration will only commence after ecological sensitive areas are known.

Land clearing: small land parcels will be cleared for the establishment of base or field camps and staging areas. Proponent shall ensure that areas identified are those that present minimal disturbance to the desert environment (natural environment and wildlife).

Fencing: Where deemed feasible, fences will be erected around field camps and target areas. Fencing will serve to keep out wildlife from target sites

3.1.3. OPERATIONAL/EXPLORATION PHASE

The phase typifies an advance level of exploration. Sampling will serve to validate prior exploration results of the mineral deposits. The appropriateness of bulk sample will be related to the deposit morphology. Mineral exploration drilling methods to be used are auger, air-core and diamond core drilling.

Drilling is used to obtain detailed information about rock types, mineral content, rock fabric and the relationship between the rock layers close to the surface and at depth. The following exploration methods will be considered:

Air-core drilling is a specialized reverse circulation drilling where a small, annular bit is used to cut a solid core of rock from relatively soft or easily broken material. The bit produces short sections of core which are recovered, along with broken rock chips, up the centre of the drill stem in the manner of a standard reverse circulation rig. The system is often capable of penetrating and coring soft sticky clays with might bind a normal blade bit.

Diamond core drilling uses an annular, diamond-impregnated bit mounted on the end of a rotating string of rods. Interestingly, these diamonds are not useful as jewellery but are used in the drill bits for their hardness and the bit is suitable for the hardest rocks. The rod cuts a solid core which passes up inside the drill rods as the bit advances. The bit is lubricated with water and drilling fluid or water/mud mixture which is pumped to the cutting face down the inside of the rods. It then returns to the surface between the rods and the sides of the hole. At the surface, the return water is collected in a sump where fine suspended ground rock material can settle. n.

Site Rehabilitation: Dug out trenches will be back filled with waste rock (gangue). Stockpiled top soil will be returned to the backfilled areas. Sites will also be PM-vegetated and returned to a pre-exploration state. Boreholes will be sealed and rehabilitation will be done concurrently with exploration (ore removal etc).

Water requirements: Water will be sourced from existing boreholes. About 80,000 litres (80 m³) per day would be required. This amount of water is aimed at suppressing dust around tipping areas and vehicle tracks. Approximately 200 *liters* of domestic water will be needed per day.

Waste management: Waste material generated will be in the form of rock material (non-mineral) and derived from trenching activities. Insignificant amounts of domestic waste will be generated by the exploration team. Domestic or general waste will be transported out of the EPL area on a daily basis and disposed at an approved land fill site. There are no licenced waste disposal sites in the project area.

Sewage Management: During exploration, sufficient portable chemical toilets will be provided for workers and appropriately emptied according to their manufacturer's operational standards and legislated occupational sanitary provisions. Licenced waste contractors will provide sewage removal services.

Exploration equipment, Materials and Services:

Exploration equipment will be sourced from contractors proximate to the project site. Were deemed essential, equipment will need to be sourced from elsewhere in the country and/or abroad as per the required and approved operating standards.

Labour sourcing: Temporary employment opportunities will be created during the duration of exploration activities.

Housing: Personnel will be accommodated at an identified exploration camp area. Before use of a camp, an environmental risk assessment will be conducted and submitted together with the biannual report of the exploration activities.

3.1.4. DECOMMISSIONING/CLOSURE PHASE

This phase will involve the removal of equipment and dismantling of facilities and safe closure. All trenches will be backfilled. The surface affected by exploration will be rehabilitated and PM-vegetated in accordance with applicable standards

3.2. CONSTRUCTION MANAGEMENT PLAN

The environmental management programme to be implemented by the proponent shall include the following key measures:

3.2.1. MANAGEMENT OF EXPLORATION CAMPSITE

1. The exploration contractor shall comply with all relevant laws and regulations concerning water provision, sanitation, wastewater discharge and liquid and solid waste handling and disposal. The contractor is referred to the requirements of the EMA.
2. The campsite will be access-controlled to prevent the access of livestock and local fauna.
3. The contractor shall not locate the campsite, or sanitation facilities, in any areas in which vegetation is pristine, nor within 100 m from any watercourse.
4. The contractor shall at all times carefully consider the machinery required for the desired task while minimizing the extent of environmental damage.
5. The contractor shall keep construction campsites clean and tidy at all times. The contractor shall not leave domestic waste uncontained, and temporary storage shall be enclosed to keep out people and animals. No permanent domestic waste disposal shall be permitted at the campsites. All domestic refuse is to be removed to an existing licensed landfill site.
6. The contractor shall take specific measures to prevent the spread of veld fires, caused by activities at the campsites. These measures may include appropriate instruction of employees about the fire risks and the construction of firebreaks around the site perimeter.

7. All vehicles and plant will be allocated a dedicated parking area in the camp site. Plant still standing for long periods of time will be provided with a drip tray in order to contain any possible hydrocarbon spills. Drip trays will be provided with absorbent material on a permanent basis.
8. Adequate firefighting equipment shall be made available and maintained on site.
9. Decommissioning of the campsite will involve removal of all compacted platforms and slab foundations or as agreed with the land owner.

3.2.2. MANAGEMENT OF FUELS AND OTHER HAZARDOUS MATERIALS

10. The contractor shall comply with all applicable laws, regulations, permits and approval conditions and requirements relevant to the storage, use and proper disposal of hazardous materials.
11. The contractor shall manage all hazardous materials and wastes in a safe and responsible manner, and shall prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials.
12. Should soil be contaminated by hazardous substances, soil will be removed and disposed of at a registered hazardous waste disposal facility.
13. The contractor shall not construct fixed fuel storage or refuel any vehicle or equipment within 100 m from a watercourse or wetland, within a floodplain, or where there is the potential for spilled fuel to enter a watercourse or groundwater. Should it not be possible to establish such facilities outside the 100 m zone, the contractor shall ensure that the necessary precautions to prevent and clean up spillages.
14. The contractor shall enclose all fixed storage.
15. The contractor shall place on – site tools and equipment, such as pumps, compressors, and generators on impermeable sheeting (i.e. polyethylene or other similar materials) to prevent hydraulic fluid or fuel leaks from contaminating soils or groundwater or entering any watercourse or wetland.
16. The contractor shall take all reasonable precautions to prevent fuel and lubricant spills during the course of construction. To this end, the contractor shall ensure that regular audits are performed to verify that no leakage or defective equipment is brought onto site.
17. The contractor shall ensure that there is sufficient spill containment and absorbent material available on site to manage accidental spills. The contractor shall immediately clean up accidental spillages of fuel and oils, or other hazardous substances.

3.2.3. MANAGEMENT OF THE EXPLORATION FOOTPRINT

18. The contractor shall prevent littering and the random discard of solid waste on the site.
19. The contractor shall manage hazardous waste.
20. The contractor shall minimize the risk of fires.
21. The contractor shall prevent trespassing on the site.
22. The contractor shall prohibit, and actively monitor and prevent, poaching or harassment of wild animals by contract employees.
23. The contractor will ensure that travelling speeds do not exceed 10 km/h and shall ensure that this restriction is enforced. This may include, but not limited to, the monitoring of vehicle speeds and the erection of speed limit signs.

3.2.4. MANAGEMENT OF DUST AND NOISE NUISANCE DURING CONSTRUCTION AND OPERATION

24. The contractor shall control dust along the construction footprint so as to ensure that no detrimental effects to occupiers of the land or general public are caused. Control measures to be considered include the use of water browsers to wet down surfaces that have been denuded and which have the potential to generate dust.
25. Wetting of denuded areas, including the topsoil stockpile, will be done in such a manner that only enough water is utilized for dust suppression, and to ensure no undue runoff is caused.
26. The contractor shall comply with legal requirements for the management of noise impacts.
27. The contractor's employees shall not make recreational use of all-terrain vehicles or motorcycles on site.
28. An appropriate freeboard will be enforced for trucks hauling dirt, sand, soil and other loose materials. All material transported by trucks will be covered to prevent undue nuisance dust during transportation.
29. Fallout dust monitoring will be conducted on a 28/ day cycle during construction.
30. Groundwater level and quality monitoring will be conducted monthly.
31. Surface water quality monitoring will be conducted, if any is present.

3.2.5. WASTE MANAGEMENT

32. Temporary storage of construction waste will be limited to within the construction camp site, and areas designated.

33. The contractor shall be responsible for the collection and removal of waste from the construction site.
34. The contractor shall arrange for the removal of waste on a weekly basis to a registered landfill site. Records of this disposal shall be kept on site.
35. Hazardous waste will be separated from domestic waste and stored in demarcated bins.
36. Hazardous waste bins will be stored on a hard standing surface, covered and made water tight.
37. Safe disposal certificate will be obtained from the sub-contractor appointed for the removal of hazardous waste, and will be in adherence to the EMA Act and the Walvis Bay Municipality waste management guidelines and by-laws.
38. The contractor shall respect the property and rights of the landowners and occupiers at all times and shall treat all such persons with courtesy.
39. Access over land, the integrity of fences, the closure of gates, control of veld fires, littering, dust control, noise abatement, harassment of animals, sedimentation and contamination of surface and ground water, damage to landscape and vegetation, and all such environmental matters, shall be controlled as far as practical by the contractor in the best interests of Charcoal Warehouse cc.

3.2.6. COMPLAINTS REGISTER

40. The contractor and proponent shall establish and maintain a register for periodic review by the Project Management Team that logs all complaints raised by I&APs about the construction and operational activities.
41. The register shall be regularly updated and maintain records, including the name of the complainant, his/her domicile and contact details, the nature of the complaint and if any action was taken to rectify the problem.

3.2.7. REHABILITATION PLAN

42. The contractor shall restore the exploration footprint to the natural contours of the ground and shall allow normal surface drainage, as far as practical.
43. The contractor shall loosen compacted soils along the construction footprint by means of a plough or scarifier. Scarifying areas where topsoil has been removed shall be carried out prior to the replacement of topsoil. Care shall be taken to avoid topsoil inversion if scarifying is carried out in areas where topsoil has not been removed. Any ripping or scarifying operations shall not exceed a depth of 100 mm.

44. The contractor shall prevent concentrated runoff along, or next to, the construction footprint, and shall do so by shaping the land, establishing vegetation, and taking other appropriate measures to absorb and disperse runoff.
45. In places where erosion control is required, including gullies, watercourses, large depressions, and steep slopes, the contractor shall construct diversion banks across the construction footprint to divert the flow of water away from the construction area and into the natural drainage courses.
46. Where the land is naturally armoured with surface rock or stone, the contractor shall, after construction, replace the armouring over the construction footprint to protect against erosion.

4. CONCLUSION AND RECOMMENDATIONS

4.1. CONCLUSION

Arising from the analysis by the consultants, the proposed project has land cover/use impacts on the proposed project site and can lead to environmental degradation, thus the EMP provides for the sustainable project implementation.

4.2. RECOMMENDATIONS

In order to alleviate any negative impacts that may emanate from the proposed project, the proponent and the contractor(s) should follow recommendations as follows:

4.2.1. ENVIRONMENT MANAGEMENT PLAN RECOMMENDATIONS

In order to ensure a healthy and safe environment in the proposed site and its environs, a plan for environmental management has to be instituted through monitoring. This involves the collection and analysis of relevant environmental data as well as periodic documentation and reporting.

4.2.2. EXTERNAL AUDITING

The key to a successful ESMP is appropriate monitoring and review to ensure effective functioning of the ESMP and to identify and implement corrective measures in a timely manner. In the event that discrepancies are identified, the problem must be investigated and attended to. All the results obtained during environmental monitoring must be documented for audit purposes.

An audit of the environmental management actions undertaken is essential to ensure that it is effective in operation, is meeting specified goals, and performs in accordance with relevant regulations and standards. Audits should be conducted during the operational

phase of the facility to ensure adherence to the management measures contained in the EMP.

4.2.3. RECOMMENDATION TO MEFT

Having looked at the potential impacts of the proposed project development, the risks associated with the development and the mitigation measures contained in this EMP, EnviroPlan Consulting cc hereby recommends that the Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (MEFT:DEA) approve the proposed mineral exploration activities and renew the Environmental Clearance Certificate (ECC) on condition that the proponent will ensure complete compliance to the developed Environmental and Social Management Plan (ESMP).

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6. APPENDIX A: ENVIRONMENTAL AUDIT REPORT



ENVIRONMENTAL COMPLIANCE AUDIT REPORT

PROPOSED MINERAL EXPLORATION ACTIVITIES ON EPL 7986,
ARANDIS, ERONGO REGION -NAMIBIA


PROPONENT: NAMIBIA URANIUM PTY (Ltd)

DOCUMENT DATA SHEET

THE PROPOSED MINERAL EXPLORATION ACTIVITIES ON EPL 7986, ARANDIS, ERONGO REGION -NAMIBIA

Document type: Environmental Compliance Audit report

Document version: Final

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DEFINITIONS AND ABBREVIATIONS

EMP	Environmental Management Plan
EMS	Environmental Management System
HME	Heavy Mining Equipment
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
MSDS	Material Safety Data Sheets

Project Name:

The Proposed Mineral Exploration Activities on EPL 7986, Arandis Erongo Region -Namibia

Period:

This audit report covers the period starting from 18 August 2022 to date, this was necessitated by the fact that the project proponent conducted reconnaissance work siting the exploration drill points and quantifying the mineral deposits at the lab as well prior to commencement of the exploration activities on EPL 7986.

Stage of Report:

Final Report

Client:

Namibia Uranium PTY (Ltd)

Date of Release:

12 May 2025

Environmental Consultant

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Confidentiality

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1. BACKGROUND

1.1. INTRODUCTION

Namibia Uranium PTY (Ltd) (project proponent) has identified the dire need for mineral exploration and mining for economic development in Namibia. In this respect the proponent has taken on a venture to explore for Base and Rare Metals, Industrial Minerals, Non-Nuclear Fuel Minerals, Precious Metals and Precious Stones Groups of minerals on EPL 7986 in Arandis. The proposed venture is also in line with the Fourth National development plan-Namibia, by creating employment and targeting value additions of local resources before export to other countries.

Mining is a prescribed activity under the Environmental Management Act (2007) that requires an environmental impact assessment to be carried out before project implementation. In this respect, the proponent intends to conduct exploration activities and identify existence of minable minerals in the area and in compliance with Namibian environmental legislation.

An Environmental Scoping Assessment (ESA) was conducted to authorize the listed activities triggered by the project in terms of the Environmental Management Act (EMA), 2007, the EIA Regulations – 2012, the EIA policy of 1995 and international environmental treaties and conventions binding Namibia.

An approved Environmental Management Plan (EMP) is in place for the proposed mineral exploration activities and EnviroPlan Consulting cc was engaged to conduct an Environmental Compliance Audit on the activities done so far as well focusing on existing EMP and legal compliance to the Namibian legislation, and the on-site environmental performance for continuous monitoring.

The audit is done in accordance with the guidelines on the statutes of the Environmental Management Act No.7 of 2007 and the Environmental Impacts Regulations (EIA) (GN 30 in GG 4878 of 6 February 2012) as well as in fulfilment of the conditions attached to the Environmental Clearance Certificate (ECC) issued for the project.

1.2. PURPOSE OF THIS REPORT

This report lists the findings of the site audit conducted on EPL 7986, Arandis on the 26th of April 2025. It is regarded as the first step of a gap analysis for the exploration activities the assessment of environmental performance of its operations. The gaps identified in these findings must be addressed by Namibia Uranium and all its contractors to ensure the site's compliance with the Namibian legislation and adopted international best practices. For each non-conformance identified, there are recommended corrective action plans for implementation, and monitoring procedures will also be highlighted to ensure future compliance.

1.3. SCOPE OF THE AUDIT

The project proponent has done a preliminary survey to obtain useful information prior to exploration activities. The scope for the site audit was limited to the following pre- exploration activities on EPL 7986:

Pre- exploration and Reconnaissance work

- ✓ Reconnaissance work- creating access routes, road signs etc.
- ✓ Reconnaissance work- identifying exploration target sites
- ✓ Reconnaissance work- digging 1m x 1m trenches, collecting samples for testing at the lab
- ✓ Reconnaissance work- identifying protected tree species, caves and labelling them.

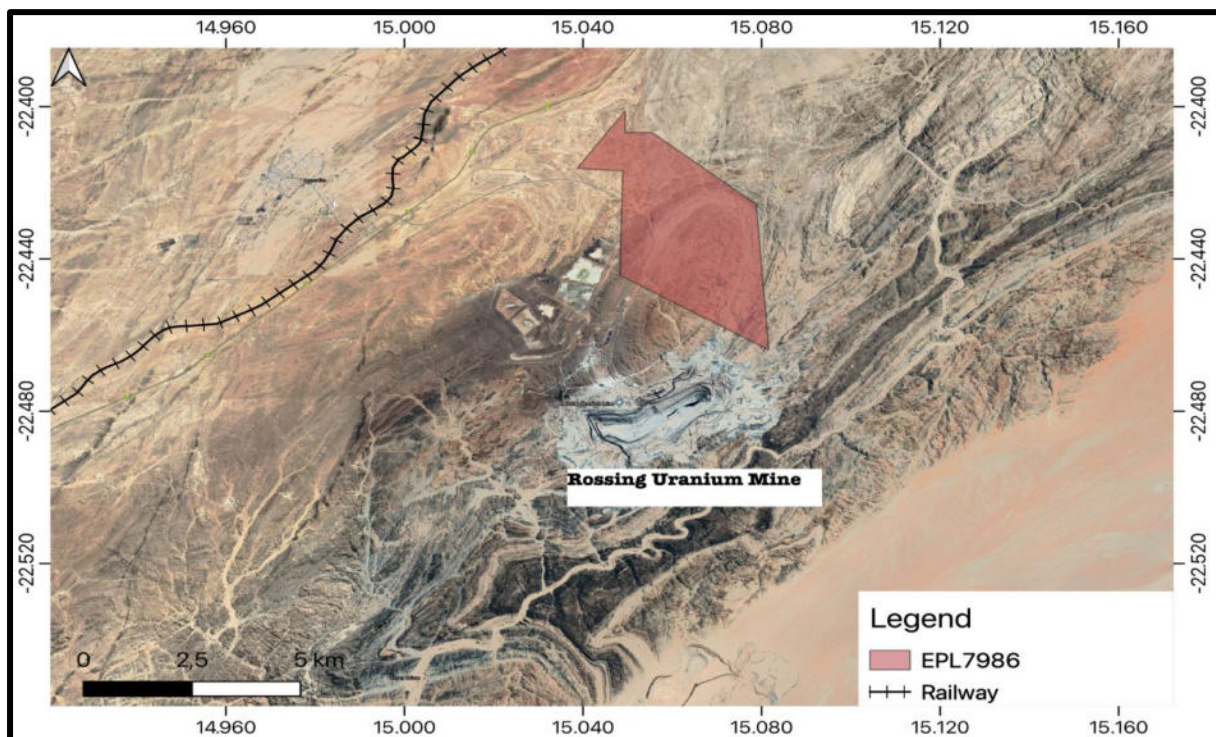
2. ENVIRONMENTAL COMPLIANCE AUDIT (ECA)

2.1. OVERVIEW

A site audit was conducted on EPL 7986 to verify the compliance with Namibia's environmental legislation and adopted international environmental best practices.

The evidence viewed and collected on site has been compiled. The table lists findings in each area of operation and the auditors have provided suggestions on how to correct where non-compliances were identified.

Figure 1 below is the project site and Figure



re 2 overleaf shows the target points within the EPL.

Figure 1: EPL 7986

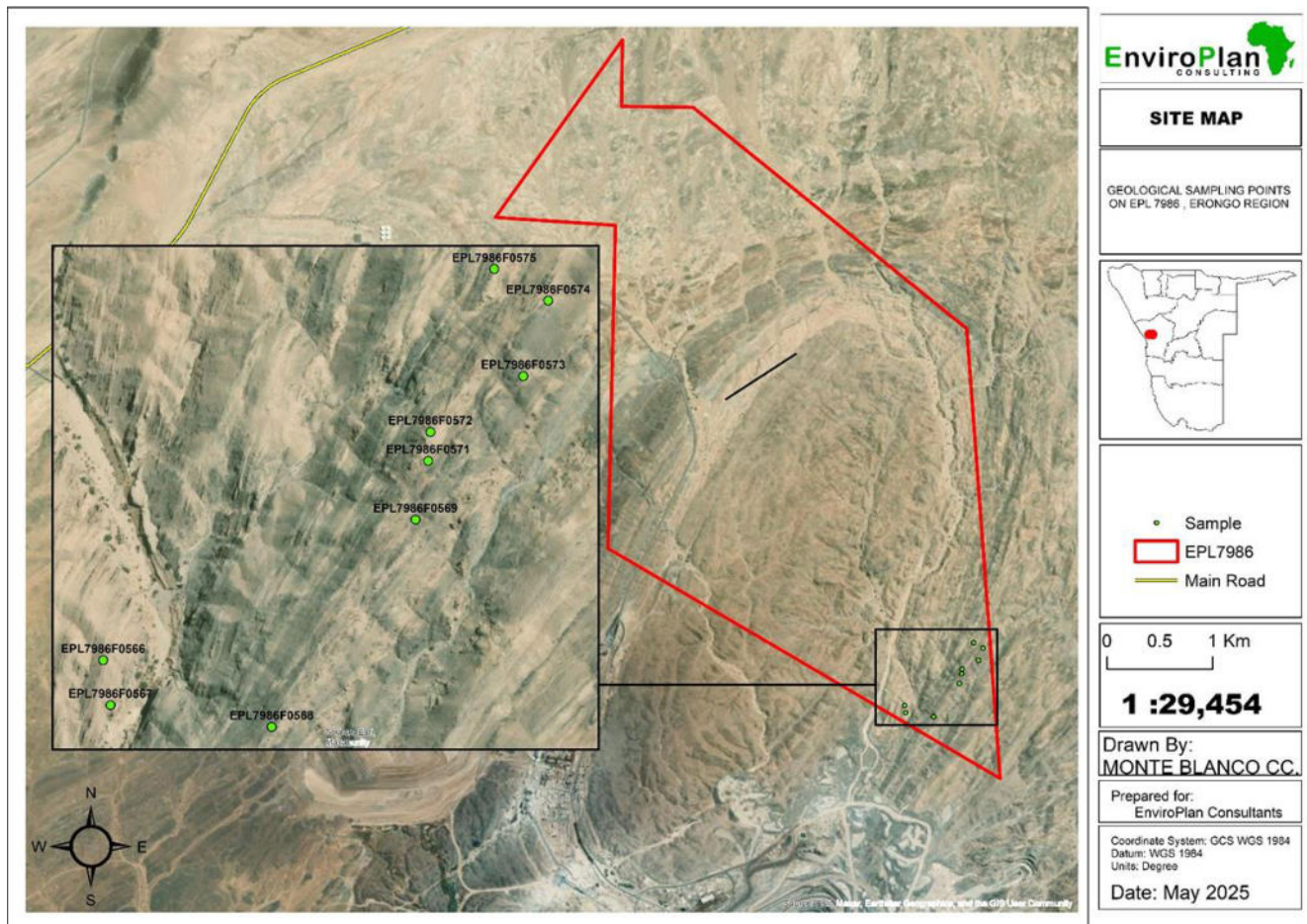


Figure 2: Targeted points

2.2. LEGAL AND OTHER REQUIREMENTS COMPLIANCE

This report presents the Environmental Compliance Audit and has been undertaken in accordance with the requirements of the Environmental Management Act, No. 7 of 2007 and the EIA Regulations of 2012. As such, key requirements in accordance with this Act, classify the proposed project as listed and invokes the need for an Environmental Management Plan to sustainably implement this project. However, legal compliance is not only limited to the EMA, but also applies to all applying legal requirements identified in the Environmental Scoping Report (ESR) compiled for the proposed exploration activities on EPL 7986 by Namibia Uranium PTY (Ltd).

Where licenses required such as wastewater discharge, the Proponent should ensure that all licenses and permits are obtained and fulfilled as per conditions. In line with the Namibian Environmental Management legislation and International best practices, the proponent will implement the necessary amendments to its existing ECC to prevent, minimise and mitigate negative impacts.

2.3. OBJECTIVES

The objectives of this compliance inspection as conducted on 26th April 2025 were to establish the extent to which the environmental management plan approved by the DEA is being followed as well as to determine the extent to which non-compliance issues can be rectified for the effective implementation of the environmental management plan.

- An assessment of legal and another requirements compliance.
- Analyse the Implementation of the Environmental Management Plan in managing environmental impacts/aspects from daily operational activities.
- Document a corrective action Environmental Management Plan.

2.4. SCOPE OF ASSESSMENT

The assessment was conducted based on a full audit of all reconnaissance works and pre-exploration operations and where non-conformances were recorded, the consultant gave a remedial action to ensure compliance. It should be noted that it is imperative to understand that the purpose and scope of the assessment is not to identify and record all non-conformances but only to obtain sufficient information upon which the ECC was issued.

This therefore means that future non-conformances, not identified during this assessment, could be recorded during subsequent assessments. It is the responsibility of Namibia Uranium to determine if similar non-conformances, such as those recorded during the assessment, exist in other areas of the environmental management plan and identify other potential negative impacts on the environment during their internal audit processes, to take the necessary corrective action.

3. ENVIRONMENTAL MANAGEMENT COMPLIANCE

3.1. POLICY AND LEGISLATORY COMPLIANCE

The proposed exploration activities on EPL 7986 will be assessed in relation to compliance with guiding legal requirements in Namibia, international conventions and best practices for environmental management and the existing Environmental Management Plan for the project as depicted in Table 1 overleaf. Compliance was categorised in the following:

- Non-Compliance (NC)
- Partial compliance (PC)
- Compliant (C)
- Not identified (NI)- The proponent has only done reconnaissance work, identifying target exploration points, dug 1mx1m pits for sampling at the lab. No further works were undertaken. This means that there were no exploration personnel, no camp site, no equipment housed at the EPL during the site inspection leading to no data to support the compliance.

Table 1: Legal and other requirements compliancy assessment

Aspect	Legislation	Compliance Status	Comments
The Constitution	Namibian Constitution First Amendment Act 34 of 1998	C	-The Proponent through conducting environmental impact assessments and applying for environmental clearance certificate renewal is complying with the requirements of the constitution.
Archaeology	National Heritage Act 27 of 2004	PC	-The Heritage studies were done on the 9 th August 2022. Findings obtained that there is existing stone stool and rock shelter/ cave(s) within the EPL and Prior to commencement of work, Contractors should be trained/informed of the archaeological findings in the project area and yet they have not been demarcated.
	National Monuments Act of Namibia (No. 28 of 1969) as amended until 1979	NI	-Employees should have been trained and informed of the course of action if they come across artefacts, graves or seeming culturally important objects and sites.
Environmental	Environmental Management Act 7 of 2007	C	-This Bi-Annual Report is in compliance to the Act. -There are two Bi-Annual reports that were missed from the date the proponent received the ECC. This was because there were no activities done on the EPL by then. The proponent will do bi-annual reporting as required

Aspect	Legislation	Compliance Status	Comments
	Pollution and Waste Management Bill (draft)	C	-The proponent is in compliance with the Bill. No sources of pollution or evidence of pollution within the EPL.
	Soil Conservation Act 76 of 1969	C	Overburden material and topsoil management is being implemented on the 1m x 1m sampling trenches
Forestry	Forest Act 12 of 2001	PC	-Identified protected tree species are not marked in the project area. -Selective cutting down of trees is being implemented.
	Nature Conservation Ordinance 4 of 1975	C	-Employees have been trained against indiscriminate tree harvesting, hunting and gathering of forest produce.
Health and Safety	Labour Act (No 11 of 2007) in conjunction with Regulation 156, 'Regulations Relating to the Health and Safety of Employees at work'.	NI	-Employees' PPE should be sufficient. -Employees need detailed training on Occupational Health and Safety. -There is need for SHEQ Signage on site.
	Public Health and Environmental Act, 2015	NI	-Site health and sanitation should be in compliance with effluent discharge requirements.

3.2. ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE

The pre-exploration activities were assessed in relation to compliance with the commissioned Environmental Management Plan upon which the previous ECC was operating under. The major environmental impacts and/ aspects identified and addressed in the EMP were assessed in relation to remediation or impact prevention with the corrective action measures provided for in the EMP. Compliance was categorised in the following:

- a. Non-Compliance (NC)
- b. Partial compliance (PC)
- c. Fully Compliance (C)

Table 2 (Overleaf): Environmental Management Compliance Summary

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
OPERATIONAL AND MAINTENANCE PHASE (Pre-exploration, exploration and post-Exploration)					
EMP and training Implementation	EMP required licenses and permits	<p>-Apply for the necessary permits or licenses from the various ministries, local authorities, and any other bodies that govern the operations of the project.</p> <p>-Finalise negotiations and resolve any outstanding issues, if any, over the allocation of user rights of the property on which the proposed activity will be located.</p> <p>- Access agreements to be met with nearby mine/s</p>	-All contracts, permits, certificates and other legal documents obtained and on file.	Fully Compliant	APRIL/MAY 2026
Labour and Recruitments	Appointments	-Appointment of contractors and employees and enter into an agreement which includes the EMP.	-Contracts on file	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-Ensure that the contents of the EMP are understood by the contractor, subcontractors, employees, and all personnel present on site.			
Management system in Health, Safety and Environment (HSE)	Provision and effective implementation of HSE management systems	<p><u>For all new employees:</u></p> <p>-Make provisions to have an HSE Coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site.</p> <p>-Have the following emergency plans, equipment, and personnel in place to deal with all emergencies:</p> <p>-Risk Management / Mitigation / Environmental Management Plan / Emergency Response Plan and HSE Manuals.</p>	<p>-Documentation on file</p> <p>-Personal Protection Equipment (PPE) on site and appropriately worn by site workers</p> <p>-Signage related to restricted areas, dangerous areas, and PPE requirements are on site.</p>	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<ul style="list-style-type: none"> -Adequate protection and indemnity insurance cover for incidents. -Comply with the provisions of all relevant safety standards. -Procedures, equipment, and materials required for emergencies. 	-Emergency response material on site		
Future environmental restoration or pollution remediation if ever required	Restoration Fund/Insurance	<ul style="list-style-type: none"> -To establish a fund for future ecological restoration of the project site should project activities cease and the site is decommissioned, and environmental restoration or pollution remediation is required -The cleared land should be rehabilitated. 	-Financial statements of restoration fund/insurance	Partially Compliant (ongoing)	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Reporting system on monitoring aspects of operations and maintenance as outlined in the EMP	Reporting	<ul style="list-style-type: none"> -Establish a reporting system to report on aspects of operation and maintenance as outlined in the EMP. -Keep monitoring reports (bi-annual reporting) on file for submission with Environmental Clearance Certificate renewal applications where needed. 	-Bi-Annual Monitoring Reports	Partially-Compliant but to be improved with Consultant's assistance	APRIL/MAY 2026
ECC Renewal every three years	Environmental Clearance Certificate (ECC) Renewal	-Appoint a specialist environmental consultant to update the EIA and EMP and apply for renewal of the Environmental Clearance Certificate prior to expiry of the valid Environmental Clearance Certificate, if there is no project ECO/SHE Officer.	-Renewed Environmental Clearance Certificate	Fully Compliant	In 3 years from the date of issuance of the new ECC

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Employment	employment and hiring of local people and contractors	-Where skills exist, local Namibian contractors and employee must be contracted and employed, respectively. Deviations from this must be justified.	-Proof of appointment of local contractors and employees on file	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Vehicular Traffic use and Safety	The site is located off the main B2 road and Rossing Uranium Mine Road. All operational activities may potentially have some impact on the movement of traffic to the site (on the B2 and Rossing Uranium Mine Road as well as site access roads) when transporting material, supplies and equipment.	<ul style="list-style-type: none"> -The project activities and vehicles should only make use of the existing access road to the site and where there is need creation of new tracks (roads) must be clearly indicated. -B2 and Rossing Uranium roads have limited speed signs and the proponent will be abide to those limits. -A valid driver's license will be required to use any motor vehicle while on duty. -No person shall drive or use any vehicle on site whilst under the influence of alcohol or any other narcotic substance or in such a way that is dangerous to human life or that may cause damage to any property or the environment. 	<ul style="list-style-type: none"> -A register of trucks arriving and leaving the site will be kept. -A report should be compiled every month of the daily number of trucks accessing the sites. -Access road permit issued to the from Namibia Uranium Mine's administration offices. 	Fully Compliant (ongoing)	APRIL/ MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<ul style="list-style-type: none"> -Proper traffic management systems in place. -Diversion or management of traffic when required. -Appropriate road signage and warnings should be erected or put up at the site access roads. -Existing tracks leading to the site should be used and unnecessary new tracks or roads should not be created. -Devise and submit a traffic management programme for sections of the roads to be closed or traffic diverted if necessary, during the delivery of materials, equipment and supplies to site. 	<ul style="list-style-type: none"> -Any complaints received regarding traffic issues should be recorded in the report together with steps taken to mitigate the impacts. 		

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Accidental Fires	Outbreak of uncontrolled or accidental fires due to the use of machinery or presence of open fires made by workers onsite.	<p>-Safety talks and job hazard analysis should be done before work starts.</p> <p>-Firefighting measures as per the Material Safety Data should be provided, implemented, and adhered to.</p> <p>-All personnel must be sensitised about responsible fire protection measures and good housekeeping such as the removal of flammable materials including rubbish, dry vegetation, and hydrocarbon-soaked soil from the vicinity of the site. Regular inspections should be carried out to check for these materials at the site.</p>	<p>-Supervision of work and reports of safe and unsafe practice brought to the attention of the health safety and environmental officer.</p> <p>-Any incidents reported recorded together with steps taken to mitigate the impacts.</p>	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-It must be assured that sufficient firefighting resources are available. A holistic fire protection and prevention plan should be available on site. This holistic plan must include an emergency response plan and firefighting plan. Regular surveys of the fire-fighting equipment and water supply should be carried out.			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-Experience has shown that the best chance to rapidly put out a major fire is in the first 5 minutes. It is important to recognise that a responsive fire prevention plan does not solely include the availability of firefighting equipment, but more importantly, it involves premeditated measures and activities to timeously prevent, curb and avoid conditions that may result in fires.			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Health, Safety and Security	Mishandling of different operational equipment, materials and tools may lead to injuries and health or life-threatening risks	<p>-All Health and Safety standards specified in the Labour Act should be complied with. The responsible contractor must ensure that all staff members are briefed about the potential risks of injuries on site.</p> <p>-Appropriate signage and warnings should be erected or put up at risky or danger prone site areas, if any.</p> <p>-Ensure all workers are issued with PPE when working with equipment on site.</p> <p>-The workers and contractors should be obliged to adhere to the following:</p>	<p>-A register of all incidents must be maintained daily. This should include measures taken to ensure that such incidents do not re-occur.</p> <p>-Inventory of all safety and health stock to be reported on a weekly basis when exploration starts.</p>	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<p>*Adhere to Health and Safety Regulations pertaining to personal protective clothing, first aid kits, warning signs, etc.</p> <p>*Ensure that adequate emergency facilities, including first aid kits, are available on site and knowledge of administering it is provided to workers.</p> <p><u>Induction training for all who enter the site is required.</u></p> <p>*Equipment that must be locked away on site and must be placed in a way that does not encourage criminal activities.</p> <p>*Security personnel to prevent unauthorised entry to site.</p>			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Soils	Physical disturbance of sensitive desert land (soils) by the movement of operational vehicles and machinery and physical site works	<p>-Adjacent areas to the project site and unused areas within the site areas should not be disturbed.</p> <p>-The use of existing tracks such as access roads is essential to minimize the footprints on the already sensitive desert soils over time.</p> <p>-The Proponent should ensure that when areas outside the project site boundaries are disturbed by project related activities, rehabilitation should be conducted immediately once the activity has been completed.</p>	<p>-Little to no visible unnecessary soil disturbance on site.</p> <p>-Vehicles making use of provided access roads to and within the site</p>	Fully compliant (ongoing)	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-To reduce erosion of soils (triggered by rainwater in rare splash flood periods) the water should be diverted towards the drainage channel like structure to ensure that the water flows in a controlled channel away from site to where it can safely flow and or infiltrate the ground and recharge aquifers (groundwater resources) without eroding the site soils.			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-The runoff channels should be maintained regularly (at least one month prior to rainy months based on the meteorological services updates of that year) to ensure that rainwater from panels flow with ease to the discharge point, in case of heavy rains (occasional splash floods).			
Dust and gaseous emissions	Dust generated during the operations is expected from untarred roads, particularly on windy days from exposed desert soils.	<p>-Regular dust suppression on unpaved access roads should be implemented when dust becomes an issue, especially in winter or windy months of the year.</p> <p>-Vehicles and machinery should not be left idling leading to emission of harmful gases into the air.</p>	<p>-Regular visual inspection.</p> <p>-Complaint register kept on site/records.</p>	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<p>-Personnel are to be issued with dust masks for health reasons when needed.</p> <p>-A complaints register of dust generated or harmful gas emitted from site related activities must be maintained.</p>			
Waste generation and management	When the project resume with exploration, there will be a generation of both general, and human waste on site.	<p>-The waste should continue to be disposed of at approved and appropriate waste facilities.</p> <p>-Temporary waste disposal facilities should be present on site. This should include separate containers for products that can be re-used or recycled.</p>	<p>-Regular visual inspection.</p> <p>-A register of waste produced, and disposal methods should be maintained.</p> <p>- No signs of littering/ pollution within the EPL</p>	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
	Potential soil polluted by hydrocarbons that may be handled on site especially from accidental oil or fuel leaks from vehicles or equipment should be treated as hazardous waste	<ul style="list-style-type: none"> -Removal of waste should be at regular (weekly) intervals to maintain visual orderliness, but more so to not give time for liquid waste to enter the soil substrate. -Recycling of solid waste should be encouraged to minimise the amount of waste that goes to landfill. -Adequate temporary ablution facilities must be erected on site to better manage sewage. 	<ul style="list-style-type: none"> -Regular of waste from site to approved disposal /management sites. -Regular removal of sewage from site and maintenance by the responsible contractor. 		

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Water resources (groundwater) and soil contamination	<p>Porous surface substrate can allow unwanted hazardous and ecologically detrimental substances to seep down to the water table either at the site of spill or after being washed away by surface flow during heavy rainy seasons.</p> <p>Accidental spills of fuel, and other chemicals that may be used on site might occur.</p>	<p>-All precautions are to be taken to prevent contamination of the soil as this could enter the ecosystem.</p> <p>-Appointing qualified and reputable sewage removal contractors is essential. The reputable contractor will handle the sewage during removal to make sure that it does not spill on the soils during transfers to contaminate it and eventually water sources/bodies (groundwater).</p> <p>-Proper training of project personnel would reduce the possibility of the impact occurring, especially with onsite soil contamination.</p> <p>-Any fuel spills must be reported, and remediation action taken.</p>	<p>-Report form for all spills or leaks on site to be completed by Contractor and submitted to the HSE department.</p> <p>-Potential soil pollutants/waste carried away to disposal sites</p>	Fully Compliant	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-Contaminated soil must be transported away from the site to an approved, appropriately classified waste disposal site. Contaminated soil should be remediated.			
Heritage Impact	Sites or objects with archaeological or cultural significance might be uncovered on site. These can include graves, stone walls or cultural artefacts.	<p>-Upon discovery of such sites or objects at some point on site or surroundings, it must be reported to the relevant authorities (National Heritage Council of Namibia (NHC) for further action/handling and permit issuance for possible conservation.</p> <p>-The destruction, damage or displacement of such sites is not allowed but report to the NHC.</p>	-The contractor must record any discoveries and proof of notifications to authorities on file. (Ongoing)	Fully Compliant (ongoing)	February 2022

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Visual Impact	This is an impact that affects the aesthetic appearance of the site		-A Visual complaints register kept on site and to be acted upon when the need arises.	Fully Compliant (ongoing)	APRIL/MAY 2025
Impact on biodiversity (fauna and flora) and ecosystem	Impacts on the ecosystem from the increase in the human footprint to the area may lead to land degradation, illegal collection of plant materials and poaching by project workers, and others.	<p>-Operational activities should be limited within the site boundaries. Further land clearing should be avoided to prevent unnecessary habitat loss.</p> <p>-All employees should be educated about the value of biodiversity.</p> <p>-Strict conditions prohibiting harvesting and poaching of fauna and flora should be incorporated into employment contracts.</p>	-A register of all plant and animal species should be kept on site.	Partially Compliant (ongoing)	APRIL/MAY 2026

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<p>-Killing, injuring, hunting, capturing, disturbing, or feeding of any wild animal or remove any part of any wild animal, whether alive or dead is prohibited.</p> <p>-No removal, destroying, damage or disturb of any egg, nest, or burrow on and around the site is allowed.</p> <p>-It is prohibited to pick, collect, destroy, damage, tamper with, disturb or remove any vegetation mineral or any other object of botanical, zoological, geological, archaeological, historical or any other scientific interest, or part thereof.</p>			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		-A register of all plant and animal species encountered within the site premises and boundary should be recorded. Photos should be taken and recorded. The details should include date of encounter, animal name and location.			
Operational Phase EMP Implementation (Continuation) – Compliance to be checked and updated once the activities of this phase have commenced (the next Environmental Compliance Check/Bi-annual Monitoring is in APRIL/MAY 2026)					

4. ENVIRONMENTAL MONITORING

An environmental monitoring plan provides a delivery mechanism to address the adverse environmental impacts of a project during its execution, to enhance project benefits, and to introduce standards of good practice to be adopted. An environmental monitoring plan is important as it provides useful information and helps to assist in detecting the development of any unwanted environmental situation, and thus, provides opportunities for adopting appropriate control measures. From the monitoring point of view, the important parameters are groundwater, occupational health and safety and fire and explosion. The suggested monitoring details are outlined in the following sections.

Table 3: Environmental Monitoring Requirements

IMPACT	RECEPTORS	TYPE OF MONITORING	IMPLEMENTATION DATE
Fire and explosion	Environment	Regular inspections should be carried out to inspect and test firefighting equipment.	Monthly
O.H.S.E	Employees	-Site inspection -Conducting Hazard and Risk Identification -Safety procedures evaluation. -Health and safety incident monitoring -Conduct Environmental Compliance Audit	Monthly Audits, and Biannual Submissions to MET.
Noise	Employees	-Observation of on-site noise levels by the Site manager and reporting to the ECO Quarterly.	Monthly
Air quality (Dust)	Employees	-Regular visual inspection -A complaint register regarding emissions/smell should be kept and acted on if it becomes a regular complaint.	Monthly
Generation of waste	Land	Site inspection on housekeeping	Monthly
Cumulative impact	Environment	Regular inspection	Monthly

4.1. GENERAL

Summary of the findings in general related to the pre-exploration activities for the EPL 7986 by Namibia Uranium.

Table 4: Audit Findings in General

FINDING	Recommended actions
Archaeological findings identified were not labelled before site mobilisation, posing risk to the identified sites.	-Engage relevant authorities to mark of the identified archology/cultural findings. If there is need to remove, NHA should be engaged to facilitate relocation.
Access road to be upgraded and avoid by all means creating several sand tracks to the site. Access agreements to be held between Namibia Uranium and Rossing Uranium Mine if the proponent keeps on using the river as their access track.	Engage Rossing Mine to allow access through the river. Upgrade the alternative route and establish a drivable gravel road.
Establishing safety signs and Re-labelling of the EPL boundaries with EPL number and proponent details. Only one traffic sign was visible within the EPL	-All boundary signs were fading and not clearer enough for reading so they need re-labelling. -Road and safety signs are needed to warn/remind workers and visitors on safety cautions

5. CONCLUSION

The site wide Environmental Compliance Audit conducted on EPL 7986 informed this audit report. If properly implemented, will help to comply to the existing EMP and to minimise adverse impacts on the environment. Were impacts occur, immediate action must be taken to reduce the escalation of effects associated with these impacts. The updated Environmental Management Plan should be used as an on-site reference document during exploration and perhaps post exploration and mining phases. Parties responsible for transgression of the EMP should be held responsible for any rehabilitation that may need to be undertaken.

Recommendations

- The Proponent must appoint and ECO to monitor the mining site Monthly, Report to MEFT Bi-Annually and to renew the ECC every three years.
- The Proponent should appoint SHE consultant to train employees on HSE and come up with a SHE policy for the company.
- Environmental representative should be appointed on site to liaise with the ECO.
- The next Biannual Report will be commissioned in April/ May 2026.

Access Agreements

- If the proponent intends to continue using the river bed as their access path, they need to arrange for an access agreement with Rossing Uranium mine.

Bi-Annual

The site's bi-annual report to MEFT is due and it will be added to the scope of work due prior to ECC renewal

7. APPENDIX B: PICTURE INVENTORY

Picture	Comments
	<p><i>The picture shows a sand track being used to access the EPL. The sand track passes through Rossing Uranium Mine's area of operation. The project proponent must establish a new access road to the EPL or make sure to acquire access agreements between Rossing Uranium and Namibia Uranium.</i></p>
	<p><i>The Picture showing the existing gravel road within the EPL between target points</i></p>
	<p><i>Overall view of the target points within the EPL (undisturbed)</i></p>



*Overall view of the target points within the
EPL (undisturbed)*



**8. APPENDIX C: COPY OF PREVIOUS ISSUED ENVIRONMENTAL
CLEARANCE CERTIFICATE**



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental
Management Act (Act No. 7 of 2007)

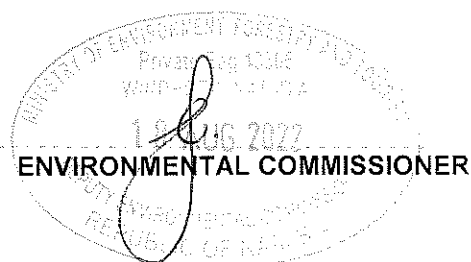
TO

Onaminda Investments CC
P. O. Box 60779, Windhoek

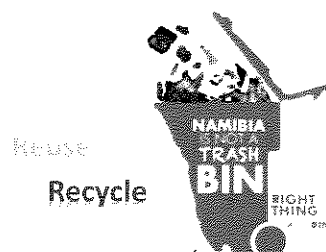
TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**Proposed Minerals Exploration Activities on Exclusive Prospecting
License (EPL) No. 7986 in Arandis, Erongo Region.**

Issued on the date: **2022-08-18**
Expires on this date: **2025-08-18**

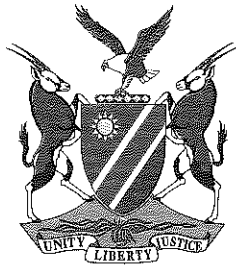


(See conditions printed over leaf)



CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment, Forestry and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during
4. the operational phase of the project
5. All applicable and required permits are obtained and mitigation measures stipulated in the EMP are applied particularly with respect to management of ecological impacts.
6. Strict compliance with national heritage guidelines and regulations is expected throughout the life-span of the proposed activity, therefore any new archaeological finds must be reported to the National Heritage Council for appropriate handling of such.



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

Tel: (00 264) 61 284 2111
Fax: (00 264) 61 232 057

Cnr Robert Mugabe &
Dr Kenneth Kaunda Street
Private Bag 13306
Windhoek
Namibia

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

NOTIFICATION OF DECISION

REF NUMBER: ECC- APP3436

DATE OF ISSUE: 18 AUGUST 2022

DETAILS OF PROPONENT:

Onaminda Investments CC
P. O. Box 60779
Windhoek
Namibia

Dear Sir/ Madam

SUBJECT: NOTIFICATION ON APPLICATION FOR ENVIRONMENTAL CLEARANCE TO UNDERTAKE THE PROPOSED LISTED ACTIVITY: Proposed Minerals Exploration Activities on Exclusive Prospecting License (EPL) No. 7986 in Arandis, Erongo Region.

Notice is herewith given in accordance with section 37(2) of the Environmental Management Act, Act 7 of 2007 and Environmental Impact Assessment Regulations of 2012 (GG 4878): that a decision in respect to your application No. **APP 3436** for Environmental Clearance Certificate to undertake a listed activity has been reached.

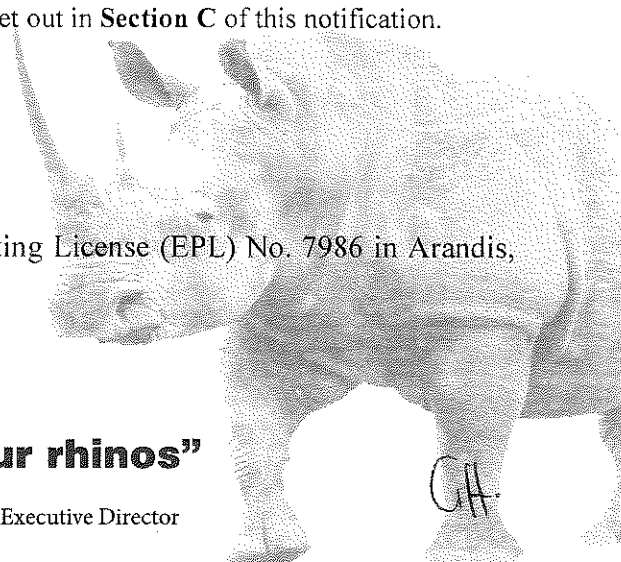
DECISION

An Environmental Clearance Certificate (ECC) to undertake the listed activities specified in the environmental assessment report and draft management plan dated February 2022, is granted (**ECC- APP3436**). The applicant / proponent is therefore advised to comply with conditions of approval set out in **Section C** of this notification.

A. DETAILS OF THE PROPOSED ACTIVITY

A1: TITLE OF THE PROPOSED ACTIVITY

Proposed Minerals Exploration Activities on Exclusive Prospecting License (EPL) No. 7986 in Arandis, Erongo Region.



A2: DETAILS OF ASSESSMENT PRACTITIONER

Junior Bianco Industrial Consultants cc

Fredrich Nghiyolwa

P O Box 23537, Windhoek

Tel: 061 219773

Mobile: 0811472029 Email: fredrich@jbic.com.na

A3: LOCATION OF PROPOSED ACTIVITY

(Annexure A – proposed site map)

B. RELEVANT LISTED ACTIVITIES

Legislation	Description of Listed Activity	Relevance to Proposed Activity
Regulation 29(sub-regulation 5) of Government Notice No. 29 of 2012	MINING AND QUARRYING ACTIVITIES 3.1 The construction of facilities for any process or activities which requires a licence, right or other form of authorisation, and the renewal of a licence, right or other form of authorisation, in terms of the Minerals (Prospecting and Mining Act), 1992. 3.2 Other forms of mining or extraction of any natural resources whether regulated by law or not. 3.3 Resource extraction, manipulation, conservation and related activities. 3.4 The extraction or processing of gas from natural and non-natural resources, including gas from landfill sites. 3.5 The extraction of peat.	Proposed Minerals Exploration Activities on Exclusive Prospecting License (EPL) No. 7986 in Arandis, Erongo Region.

C. CONDITIONS

C1: Conditions of Approval

1. This certificate does not in any way hold the Ministry of Environment, Forestry and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants.
2. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project.
3. Regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored throughout this process.

C2: Clearance Certificate Validity

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.
2. On expiry of the ECC, the proponent is required to submit within a period not exceeding one month, and in the prescribed form and manner an application to the Office of the Environmental Commissioner for the renewal of the ECC.
3. Failure to renew an expired environmental clearance certificate shall result in permanent termination of the environmental clearance certificate.
4. In terms of Section 3 (2)C of the Environmental Impact Assessment, you are instructed to, within 14 days of this notice issuance date, ensure that all registered interested and affected parties ("I&APs") are notified that an environmental clearance certificate has been issued in respect to your application and of their right to appeal

C3: Compliance with authorization under other laws

5. All other applicable and required permits or authorization from relevant competent authorities must be obtained prior to commencing the proposed activities and accordingly adhered to.

C4: Implementation and Monitoring

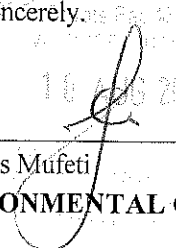
6. The granting of the Environmental Clearance Certificate (ECC) constitute, an approval for the implementation of mitigation measures proposed in your approved Environmental Management Plan (EMP), hence making the approved EMP legally binding document.
7. The proponent shall appoint a suitably experienced environmental control officer, or site agent where appropriate, before the commencement of any listed activities to ensure compliance with the conditions of approval and mitigation stipulated in the approved EMP
8. A copy of the Environmental Clearance Certificate (ECC), EMP, Environmental Audit and monitoring reports must be kept at the site of the authorized activity and readily available for inspection by officials of the Ministry and registered Interested and affected Parties (I&APs) on request.
9. Should any heritage remains be exposed during excavations or any other actions on the site, these must immediately be reported to the National Heritage Council of Namibia. Heritage remains uncovered or disturbed during earthworks must not be further disturbed until the necessary approval has been obtained from National Heritage Council.
10. Using the best and affordable methodology, the Proponent must ensure that all listed activity's operations footprints are thoroughly rehabilitated prior to closure of the operation. Wherever possible, the Proponent must proceed with the rehabilitation process concurrently with the progression of the project rather than wait until the damage is far beyond the available means of management.
11. The general standard for all rehabilitation processes must at all costs aim at restoring the natural character of the environment to the satisfaction of the Ministry of Environment, Forestry and Tourism. Such rehabilitation processes shall be inspected and certified satisfactory or unsatisfactory by the Ministry of Environment, Forestry and Tourism. Where a certificate of unsatisfactory is issued, the Proponent shall be advised to carry-out certain tasks to meet the requirements. Failure to meet the basic rehabilitation requirements shall be regarded by this Ministry as a breach of this contract and of which serious consequences shall follow.

12. Officials of the environmental commissioner's office may from time-to-time conduct spot-inspection (non-auditing) without prior notice and or Auditing Inspection (dates to be agreed prior to arrival to the site), hence access to the site and the aforementioned documentation must be granted to any authorized official representing the Office of the Environmental Commissioner and Registered Interested and Affected Parties (I&APs)
13. Any changes to, or deviations from the scope of the alternative described in section B above must be accepted or approved, in writing, by the Office of the Environmental Commissioner before such changes or deviations may be implemented. In assessing whether to grant such acceptance/ approval or not, the Competent Authority may request information in order to evaluate the significance and impacts of such changes or deviations, and it may be necessary for the holder to apply for further authorisation in terms of the applicable legislation.
14. Officials representing the Office of the Environmental Commissioner must be, in possession and or by request and for the purpose of inspection referred to in C4(12) present their staff identification card in order to gain entry to the premises
15. The proponent is required, from the date of commencing implementation of project activities, to compile and submit environmental monitoring reports (on project progress and the environmental management profile) on a bi-annual basis to Office of Environmental Commissioner
16. Any changes to, or deviations from the scope of project activities approved in respect to the assessment received and reviewed for the purpose or granting this ECC Number (**ECC- APP3436**) are subject to an amendment application and approval by the Environmental Commissioner prior to adopting / implementing any such changes / deviations.
17. For the purpose of amending and or transferring the ECC, the proponent submit in the prescribed form and manner an application to the Office of the Environmental Commissioner, clearly indicating the need for amendment and or transfer of the ECC
18. Non-compliance with a condition of this Environmental Clearance Certificate or EMP may render the Proponent liable to criminal prosecution.

D. DISCLAIMER

1. The decision taken by the Office of Environmental Commission is based mainly on information provided by the proponent or their representative, therefore, it must be noted here that the proponent is accountable for any wrong and misleading information that may have been presented in the environmental assessment documents.

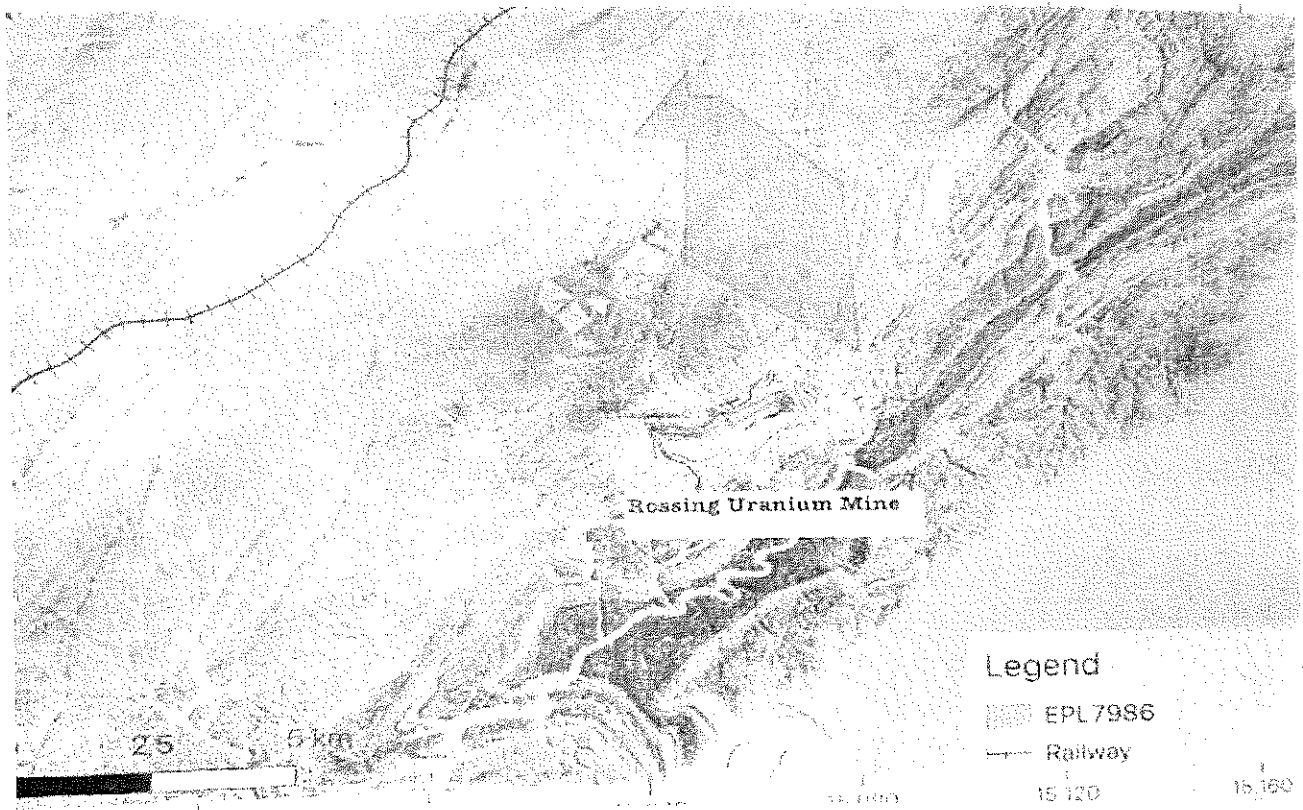
Yours sincerely,


Timoteus Mufeti

ENVIRONMENTAL COMMISSIONER

ANNEXURE A: ECC APP3436 - SITEMAP / SITE LAYOUT

ENVIRONMENTAL ASSESSMENT FOR THE AREA COVERED BY EPL 7986 & MINERAL EXPLORATION ACTIVITIES



Stamp

GH.