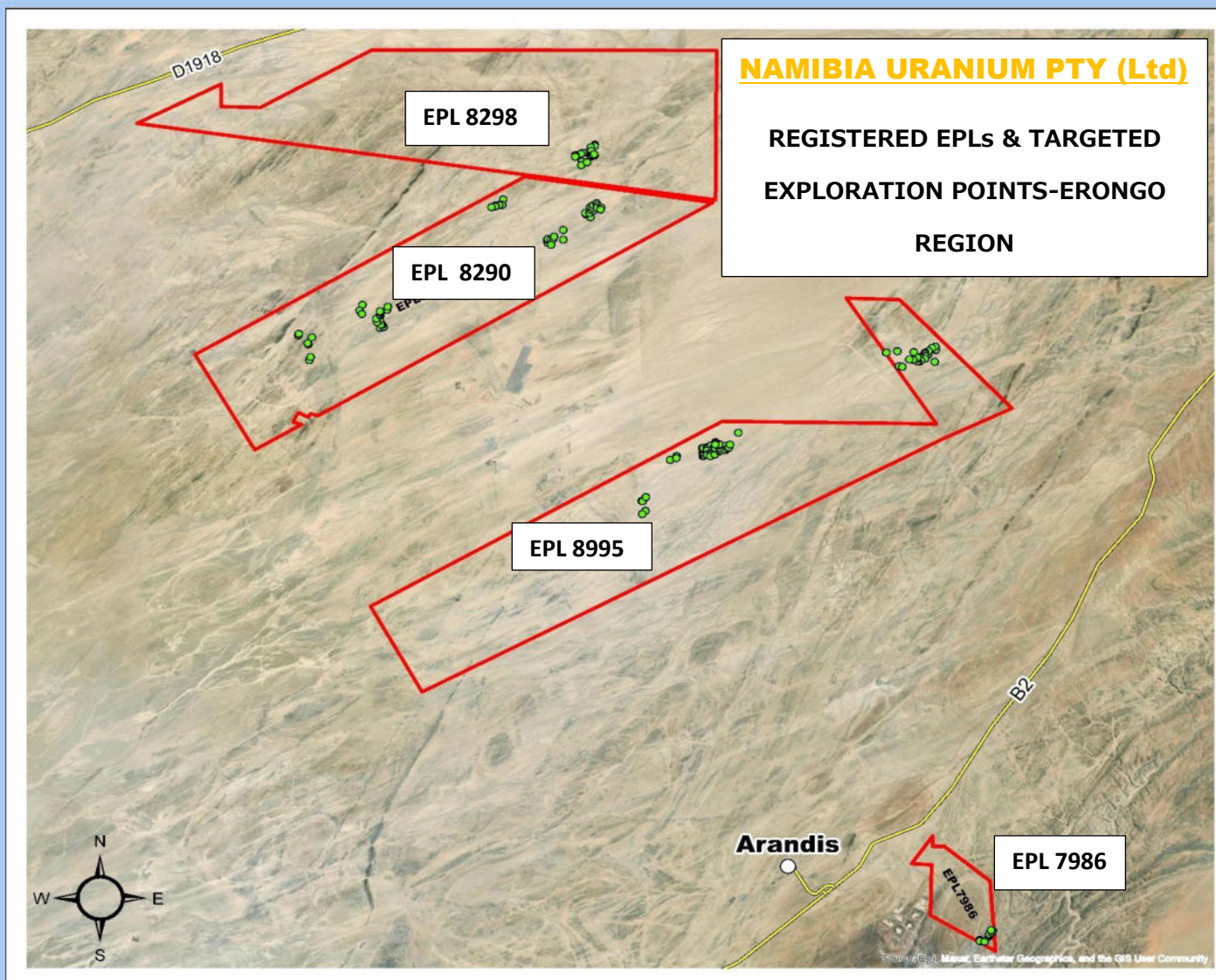


The Proposed Mineral Exploration Activities on EPL 8298, Trekkopje, Erongo Region - Namibia

Updated Environmental Management Plan

Version-Final for submission

MEFT APP-5739



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DOCUMENT DATA SHEET

RENEWAL AND AMENDMENT OF ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED MINERAL EXPLORATION ACTIVITIES ON EPL 8298, NEAR TREKKOPJE, 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 (R)	Environmental Impact Assessment (Report)
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
EPL	Exclusive Prospecting license
GHGs	Greenhouse Gasses
HAIA	Heritage and Archaeological impact Assessment
ISO	International Organization for Standardization
I&Aps	Interested and Affected Parties
MEFT: DEAF	Ministry of Environment, Forestry and Tourism's Directorate of Environmental Affairs and Forestry
NHC	National Heritage Council
NEMA	Namibia Environmental Management Act
RA	Roads Authority
ToR	Terms of Reference
UNFCCC	United Nations Framework Convention on Climate Change

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. Overview

The proponent, **Sion Dimbulukweni Mwatukange** has identified the economic potential of mineral deposits found in the Erongo Region. The proponent is a holder of a licence to explore a land area of 17411.2 hectares (ha). The area covered by the Exclusive Prospecting Licence (EPL 8298), falls within communal land. Namibia Uranium (NU) (PTY) LTD currently holds access to the mineral rights on EPL 8298, In this respect, NU and the proponent plans to undertake mineral exploration activities, primarily targeting uranium ore deposits.

As per the requirements of the Namibian environmental legislation (Environmental Management Act (No. 7 of 2007 and the Environmental Impact Assessment Regulations of 2012), an EIA is required to obtain an Environmental Clearance Certificate from the Ministry of Environment and Tourism (MET) before the project can proceed. This is because under the 2012 Environmental Impact Assessment (EIA) Regulations of the Environmental Management Act (EMA) No. 7 of 2007, mineral exploration is a listed activity that may not be undertaken without an Environmental Clearance Certificate (ECC). This activity is listed under the following relevant sections:

Table 1: Listed Activities -Environmental Management Act No. of 2007

ACTIVITY	RELEVANT SECTIONS
MINING AND QUARRYING ACTIVITIES	<ul style="list-style-type: none"> - 3.1 The Exploration 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.

1.2. The Environmental Consultant

Namibia Uranium has appointed EnviroPlan Consulting cc as the appointed Environmental Consultant to conduct an Environmental Impact Assessment (EIA) and develop an Environmental Management Plan (EMP) for the undertaking of mineral exploration activities and to apply for an Environmental Clearance Certificate with the Directorate of Environmental Affairs.

1.3. Project Location

EPL 8298 block is located in western Namibia, Erongo Region as part of the Brandberg-Erongo mining district (Fig 1) overleaf. The exact target waypoints of exploration coordinates are as presented on

table 2 below, and the geological sampling sites/ target points are presented as figure 2 overleaf. The EPL boundary is depicted on figure 1 overleaf.

Table 2: EPL 8298, Target points

Target points	Coordinates
1st cluster	
A	-22.036191, 14.869620
B	-22.034198, 14.869904
C	-22.034678, 14.872503
2nd Cluster	
A	-22.031513, 14.874611
B	-22.031139, 14.874271
C	-22.031116, 14.875401
D	-22.030949, 14.876294
E	-22.030254, 14.876158
F	-22.028525, 14.874768
G	-22.027095, 14.874425
H	-22.026486, 14.874484
I	-22.025154, 14.876579
	-22.025743, 14.876494
3rd cluster	
A	-22.031589, 14.866499
B	-22.030806, 14.866610
C	-22.030525, 14.868364
D	-22.029415, 14.870550
E	-22.029962, 14.869459

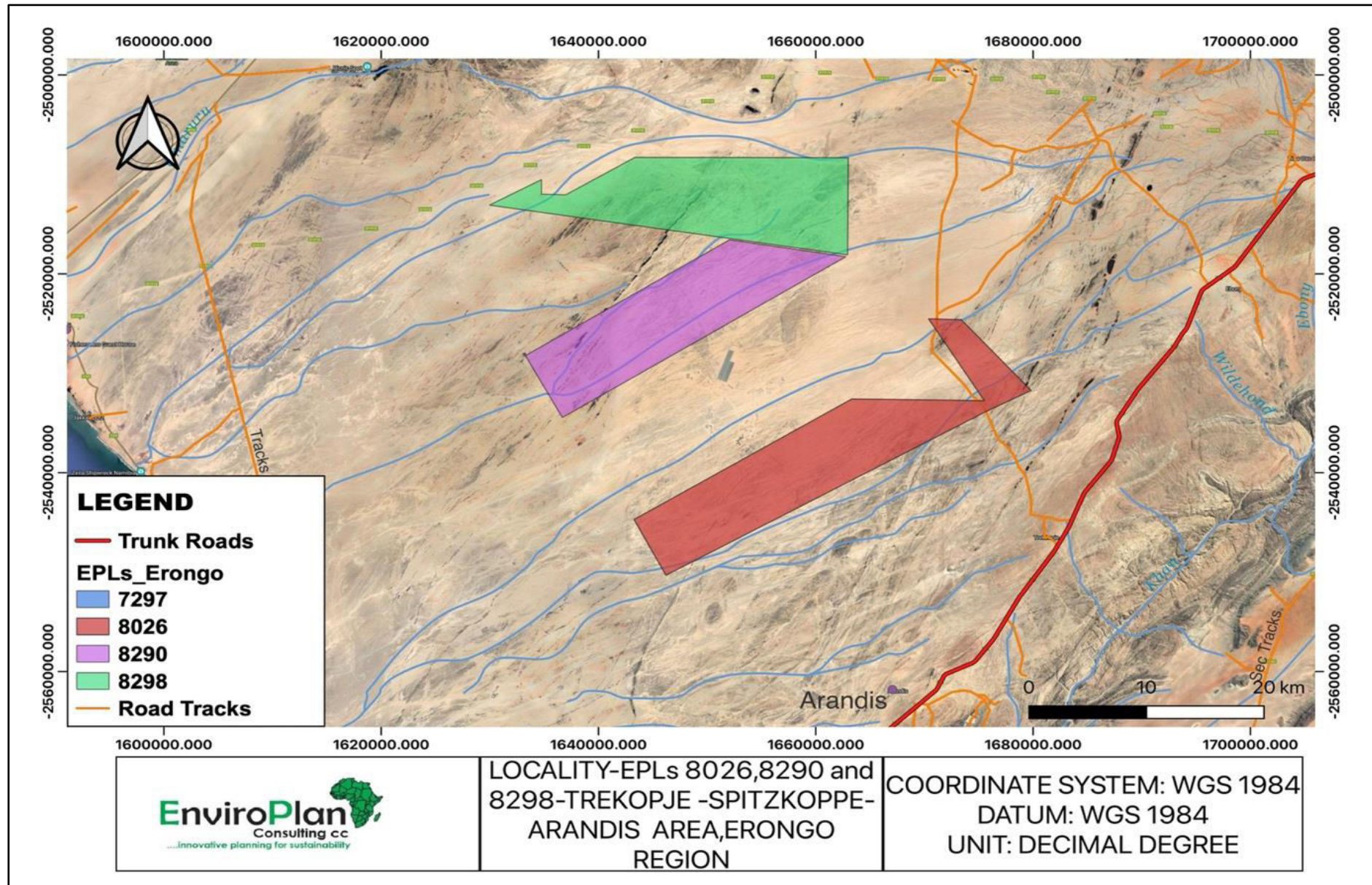


Figure 1: EPL 8298 Locality.

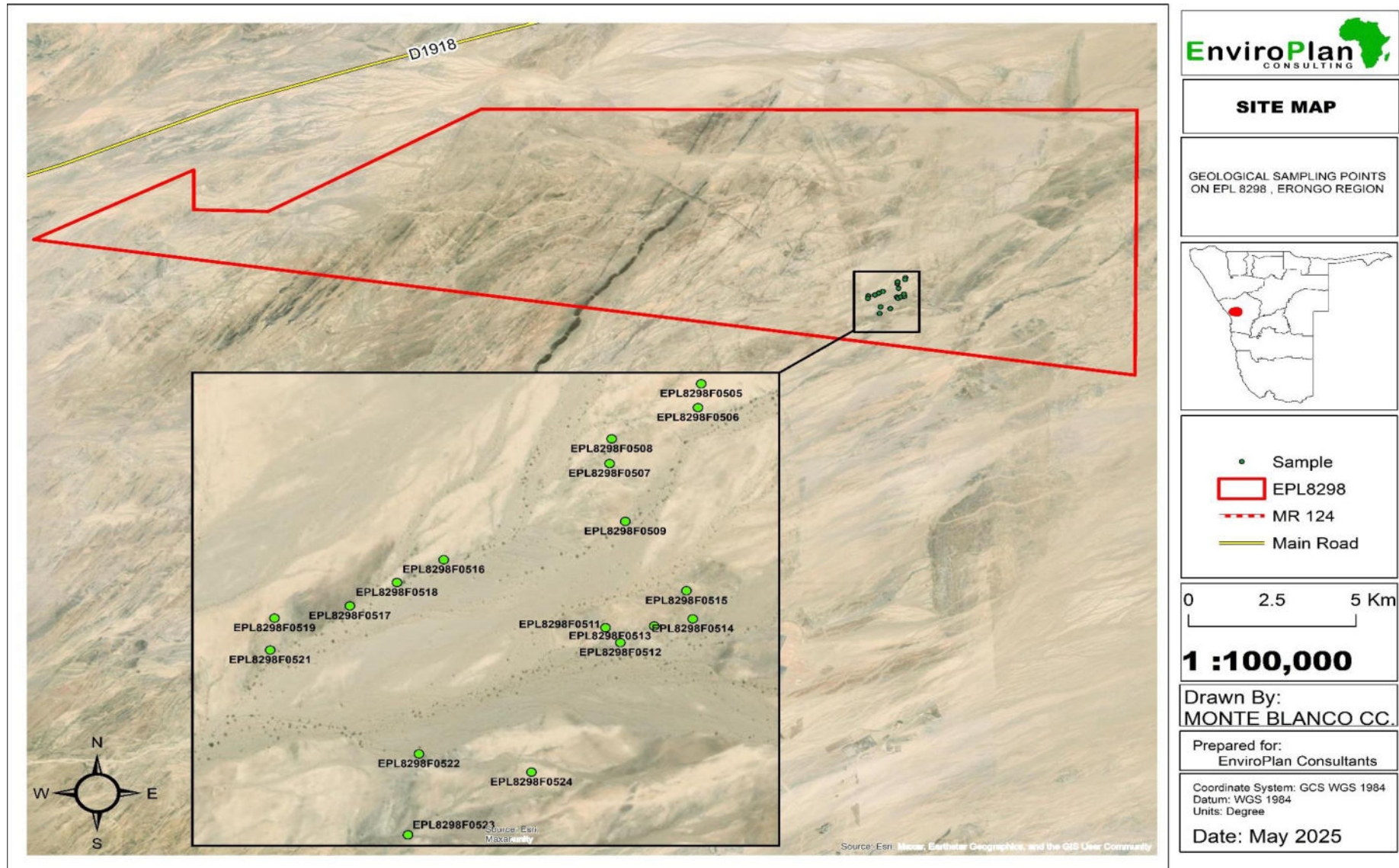


Figure 2: Geological sampling points on EPL 8298

1.4. Scope of Work

The scoping study was carried out in accordance with the Environmental Management Act (EMA) (7 of 2007) and its 2012 EIA Regulations (GG No. 4878 GN No. 30).

This Environmental and Social Management plan (ESMP) was developed as a working document for the proponent ensure that there is environmental conservation, social acceptance and sustainability in their operation. The ESMP only covers mineral exploration, should the project be feasible for mining, a detailed ESIA should be commissioned.

1.5. PROJECT DESCRIPTION

Explorations comprise various phases. For this EIA, the phase-based activities were categorized to enable impact assessment and analysis. The different project sections are as follows:

1.5.1. Pre- Exploration phase: 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 exploration team sited about fifty-three (53) sampling points within the EPL digging out a maximum of 1m-by-1m pits. The Environmental consultant made a compliance inspection audit and witnessed a several number of open pits which were dug out during the process and prior to bi-annual reporting. Figure 3 below shows the sampling pits within EPL 8298.



Figure 3: Sampling pit in EPL 8298

1.5.2. Exploration Phase (Site Preparation)

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 EPLs. 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 and agreed jointly with landowners.

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 natural environment and wildlife.

Creation of access routes and haul tracks: Apart from the existing sand tracks and service roads network leading to target areas, additional tracks (extensions from farm roads) 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.

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

1.5.3. Operational 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 – 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.

1.5.4. *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

1.5.5. *Environmentally sensitive areas identified*

The proposed exploration activities are not in any sensitive protected areas such as community forests, conservancies, and areas with memorial sites. A Specialist Heritage and Archaeological impact Assessment was commissioned for the project area.

2. CHAPTER TWO: POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

2.1. Introduction

An important part of the ESMP is identifying and reviewing the administrative, policy and legislative situation concerning the proposed activity, to inform the proponent about the requirements to be fulfilled in the project development and implementation. This section looks at the legislative framework within which the proposed project will operate under. The focus is on compliance with the legislation during the planning, Exploration and operational phases. All relevant legislation, policies and international statutes applying to the project are highlighted in Table 2 below as specified in the Environmental Management Act, 2007 (Act No.7 of 2007) and the regulations for Environmental Impact Assessment as set out in the Schedule of Government Notice No. 30 (2012).

The pursuit of sustainability by an Organisation is operationalised by a sound policy and legislative framework that gives operating parameters within its sphere of operation. In this section, relevant legal instruments, as well as their relevant provisions, are identified and analysed on their relevance to the proposed project. A concise explanation is given of the applicability of each of the identified pieces of legislation as well as how the Roads Authority is supposed to implement environmental compliance to the project.

Table 3: Policies, legal and administrative regulations

Aspect	Legislation
The Constitution	Namibian Constitution First Amendment Act 34 of 1998
Archaeology	National Heritage Act 27 of 2004
	National Monuments Act of Namibia (No. 28 of 1969) as amended until 1979
Environmental	Environmental Management Act 7 of 2007
	EIA Regulations GN 57/2007 (GG 3812)
	National Solid Waste Management Strategy
	Pollution and Waste Management Bill (draft)
	National Waste Management Policy
	Soil Conservation Act 76 of 1969
	Hazardous Substance Ordinance (No. 15 of 1973)
	Atmospheric Pollution Prevention Ordinance, 1976
	National Policy on Climate Change for Namibia, 2010
	National Biodiversity Strategy and Action Plan (NBSAP2)
Forestry	Forest Act 12 of 2001
Water	Water Act 54 of 1956
	Water Resources Management Act, 2013 (Act No. 11 of 2013)
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'.
	Public Health and Environmental Act, 2015
Services and Infrastructure	Road Ordinance 1972 (Ordinance 17 Of 1972)
Mining	Mineral Policy of Namibia Minerals (Prospecting and Mining) Act 33 of 1992

3. CHAPTER THREE: ENVIRONMENTAL MANAGEMENT PLAN (EMP)

3.1. EMP Organisation, Responsibility And Authority

This section describes the key functionaries in the planning, implementation and monitoring of the EMP. Copies of this EMP shall be kept at the site office and will be distributed to all senior contract personnel. All senior personnel shall be required to familiarise themselves with the contents of this document.

The implementation of this EMP requires the involvement of several stakeholders, each fulfilling a different but vital role to ensure sound environmental management during each phase.

3.1.1. *Site instruction entries*

The Site Instruction Book entries will be used for the recording of general site instructions as they relate to the works on site and EMP measures. It will also be used for the issuing of stop-work orders issued by the ECO for the purposes of immediately halting any particular activities of the Contractor in lieu of the environmental risk that they may pose.

3.1.2. *ECO diary entries*

The purpose of these entries will be to record the comments of the ECO as they relate to activities on the site including infringements, possible changes to the EMP or work stop orders.

3.1.3. *Method statements*

Method statements from the Contractor will be required for specific sensitive actions on request of the authorities or ESM. A method statement forms the baseline information on which sensitive area work takes place and is thus considered a “live document” in that modifications can be negotiated between the Contractor and EC if or as required. The Contractor (and, where relevant, any subcontractors) must also sign the Method Statement, thereby indicating that the works will be carried out according to the approved methodology. Changes in the methodology must be reflected by amendments to the original approved Method Statement. Amendments must be signed by both the EC and PM, denoting that the change is environmentally acceptable. The Contractor must also sign the amended Method Statement.

All method statements will form part of the EMP documentation and are subject to all terms and conditions contained within the EMP main document. The Method Statement shall cover applicable details with regard to:

- Exploration procedures;
- Materials and equipment to be used;
- How and where materials will be stored;
- The containment of accidental leaks or spills;
- Timing and location of activities; and
- Any other information deemed necessary by the ESM.

The Contractor must submit the method statement two weeks before any particular Exploration activity is due to start, especially with respect to impacts on sensitive ecosystems. Work may not commence until the method statement has been accepted by the Geologist and ECO, and clearly communicated to the workforce. The Contractor shall, except in the case of emergency activities, allow 14 days for consideration and approval of the Method Statement. The Geologist and the ECO may require changes to a Method Statement if the proposal does not comply with the specifications or if, in the reasonable opinion of the ECO, the proposal may result in damage to the environment in excess of that permitted by the specifications. Approved Method Statements shall be communicated to all relevant personnel.

All Method Statements listed below, shall be provided by the Contractor before the activity commences:

(i) Bunding

Method of bunding for static plant and bulk fuel storage.

(ii) Camp establishment and fencing

- *Location and layout of the Contractor's Camp.*
- *Method of installing fences required for working areas and Contractor's Camp.*

(iii) Drilling

Location and layout of target exploration areas and camp site areas.

(iv) Demolition

Proposed method of demolition, including handling and disposal of materials.

(v) Dust

Dust control protocol.

(vi) Fire and hazardous substances

- *Handling and storage of hazardous wastes.*
- *Emergency spillage procedures and compounds to be used.*
- *Emergency procedures for accidental fire.*
- *Methods for the disposal of hazardous materials.*

(vii) Fuels and fuel spills

- *Methods of refuelling vehicles.*
- *Details of methods for fuel spills and clean-up operations.*

(viii) Protection of archaeological resources

Methods for dealing with archaeological resources in the event that any are found.

(ix) Protection of environmentally sensitive resources (fauna and flora)

- *Methods for dealing with conservation areas or areas identified as environmentally sensitive requiring protection.*
- *Locality and preparation of onsite nursery to house vegetation relocated from Exploration areas or propagated locally for replanting purposes.*

- *Details of methods dealing with the identification, transportation and transplanting of flora species of conservation value.*
 - *Details of methods dealing with the identification, capture and relocation of fauna species of conservation value.*
- (x) Rehabilitation
Rehabilitation of disturbed areas after exploration is complete.
- (xi) Solid waste management
Solid waste control and removal of waste from Site.
- (xii) Topsoil handling and stockpiling
Details on stripping, handling and stockpiling of topsoil.
- (xiii) Wash areas
Location, layout, preparation and operation of all wash areas.
- (xiv) Storm water management
Details of how storm water is to be handled on Site.

3.2. Environmental Education

Before any work is commenced on the Site, the entire Contractor's staff including foremen shall attend an environmental education talk, presented by the EC with. The Contractor shall liaise with the EC prior to the commencement date to fix a date and venue for the talk. The Contractor shall ensure that all the employees attend the talk.

Follow-up education talks shall be held for any new employee/s coming onto Site from time to time. The EC shall ensure that all attendees sign an attendance register, and shall provide the ECO with a copy of the attendance register.

3.3. Record Keeping

All records related to the implementation of this management plan (e.g., site instruction book, ECO diary, induction records, method statements) must be kept together in an office where it is safe and can be retrieved easily. All relevant records should be kept for a minimum of two years after Exploration and should at any time be available for scrutiny by any relevant authority or stakeholder.

It is recommended that photographs (fixed-point photographs for better comparisons before/during/after) are taken of the site prior to, during and immediately after Exploration as a visual reference. These photographs should be stored with related documents and other records related to this EMP.

3.4. Environmental Completion Statement

An Environmental Completion Statement will be prepared by the EC for submission to the Department of Environmental Affairs (Ministry of Environment and Tourism) indicating completion of the project

and compliance with the EMP and conditions. This statement will be prepared after the final audit after the rehabilitation phase.

3.5. Roles And Responsibilities

3.5.1. Duties and Powers of the Environmental Consultant (EC)

The Environmental Consultant is ultimately responsible for:

- The environmental and social consultant will be responsible for the periodic monitoring and evaluation of EMP implementation.
- Assisting the Contractor in finding environmentally responsible solutions to problems.
- Monitoring the undertaking by the Contractor of environmental awareness training for all new personnel coming onto site.
- Advising on the removal of person(s) and/or equipment not complying with the specifications via the PM.
- Auditing the implementation of the EMP and EMP compliance on a monthly basis.
- Undertaking a continual review of the EMP and recommending additions and/or changes to the document.
- The management and continuous monitoring of the implementation of the EMP on a daily basis will be the responsibility of the Resident Engineer.

3.5.2. Duties and Powers of the Project Manager

The Geologist is ultimately responsible for:

- The Project Manager (PM) of the proponent will act with restricted powers and responsibilities as delegated by the proponent in writing.
- For this project it is envisioned that the function of the Environmental Control Officer (ECO) will only require part time inputs. The PM may fulfil the function of the ECO thereby taking responsibility of the ECO's duties (see below) on this project.
- Any on-site decisions regarding environmental management are ultimately the responsibility of the PM with consultation with the environmental Consultant. Therefore, the PM must assign the role of ECO to a competent member of its site supervising team. The PM shall assist the ECO where necessary and will have the following responsibilities in terms of the implementation of this EMP:
 - Ensuring that the necessary environmental authorisations and permits have been obtained by the Contractor.
 - Assisting the Contractor in finding environmentally responsible solutions to problems with input from the ECO where necessary.
 - Ordering the removal of person(s) and/or equipment not complying with the EMP specifications.
 - Issuing fines for transgressions of site rules and penalties for contravention of the EMP.

3.5.3. *Duties and Powers of the Environmental Control Officer*

The Environmental Control Officer (ECO) will be a competent person determined by the PM and EC to fulfil the role as the Employer's representative to monitor and review the on-site environmental management and implementation of this EMP by the Contractor.

The ECO's duties will include the following:

- Assisting the PM in ensuring that the necessary environmental authorisations and permits have been obtained.
- Maintaining open and direct lines of communication between the PM, Employer, Contractor, and interested and affected parties with regard to environmental matters.
- Facilitating all communication between the local community and the contractor.
- Regular site inspections of all Exploration areas with regard to compliance with the EMP.
- Monitoring and verifying adherence to the EMP by verifying that environmental impacts are kept to a minimum.
- Taking appropriate action if the specifications are not followed.
- Recommending the issuing of fines for transgressions of site rules and penalties for contraventions of the EMP via the PM.

3.5.4. *Duties of the Contractor*

The contractor shall be responsible for the implementation of the EMP and the action plan, onsite monitoring and evaluation of the EMP through the following;

On the on-set of the project, the contractor through an Environmental Officer shall:

- Develop a Hazard Identification and Risk Assessment report on the on-set of the project to be approved by the environmental Consultant.
- Developing a waste and contractors camp management plan to be approved by the environmental consultant
- Submit a monthly Environmental Performance report to the Environmental Consultant.

In addition, the Contractor shall furthermore ensure that adequate environmental awareness training of senior site personnel takes place and that all Exploration workers receive an induction presentation on the importance and implications of the EMP.

The presentation shall be conducted, as far as is possible, in the employees' language of choice.

As a minimum, training should include:

- Explanation of the importance of complying with the EMP.
- Discussion of the potential environmental impacts of Exploration activities.
- The benefits of improved personal performance.
- Employees' roles and responsibilities, including emergency preparedness.
- Explanation of the specifics of this EMP and its specification (no-go areas, etc.) and of the mitigation measures that must be implemented when carrying out their activities.

- Explanation of the management structure of individuals responsible for matters pertaining to the EMP.
- The contractor shall keep records of all environmental training sessions, including names, dates and the information presented.

The induction programme should be developed and submitted to the PM and environmental consultant for approval.

NB: The Contractor shall clearly describe the overall methodology proposed for the task specific related activities in particular method statements.

All method statements must take environmental requirements into account.

3.6. Financing Of Environmental Control

Financing of the environmental requirements as outlined in this document, apart from the appointment of the ESM and specialists, is the sole responsibility of the Proponent and the exploration contractor.

3.7. Amendments Of The EMP

Any party involved with the project can suggest changes to the EMP via the EC or PM. Such suggestions will be discussed with the Environmental Forum. Approved changes will be minute and drafted into the existing EMP in the form of an appendix or amendments.

3.8. Procedures for non-compliance

The Contractor shall comply with the environmental specifications and requirements on an ongoing basis and any failure on his part to do so will entitle the PM to impose a penalty. This applies to the Environmental Management Plan (EMP).

In the event of non-compliance, the following recommended process shall be followed:

- The PM shall consult the environmental consultant and if agreed, issue a notice of non-compliance to the Contractor, stating the nature and magnitude of the contravention. A copy shall be provided to the ECO.
- The Contractor shall act to correct the non-conformance within 24 hours of receipt of the notice, or within a period that may be specified within the notice.
- The Contractor shall provide the PM with a written statement describing the actions to be taken to discontinue the non-conformance, the actions taken to mitigate its effects and the expected results of the actions. A copy shall be provided to the ECO.
- In the case of the Contractor failing to remedy the situation within the predetermined time frame, the PM shall impose a monetary penalty based on the conditions of contract.

- In the case of the Contractor being unable to remedy the situation due to permanent environmental damage already incurred, the PM shall impose a monetary penalty based on the conditions of contract.
- In the case of non-compliance giving rise to physical environmental damage or destruction, the PM shall be entitled to undertake or to cause to be undertaken such remedial works as may be required to make good such damage and to recover from the Contractor the full costs incurred in doing so.
- In the event of a dispute, difference of opinion etc, between any parties in regard to or arising out of interpretation of the conditions of the EMP, disagreement regarding the implementation or method of implementation of conditions of the EMP etc., any party shall be entitled to require that the issue be referred to independent specialists for determination.
- The PM shall at all times have the right to stop work and/or certain activities on site in the case of safety and EMP non-compliance or failure to implement remediation measures.

4. CHAPTER FOUR: ENVIRONMENTAL MANAGEMENT PLAN

4.1. Exploration phase

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Conflict.	<ul style="list-style-type: none"> Communities dissatisfied with the activities Nuisances caused by the building contractor 	<ul style="list-style-type: none"> Clear communication between contractor and community and farmers, on the schedule/timeframe for operations and the duration of the Exploration phase. This should be provided for in the form of a Public Consultation Plan (PCP) which should include at least: <ul style="list-style-type: none"> One meeting for site-handover and to introduce the local community and farmers to the Contractor A system for the on-going management of the communication between the Contractor and local community and farmers, which should include: <ul style="list-style-type: none"> A means for lodging a complaint concerning Exploration activity Provision of feedback to the plaintiff from the Contractor stating how the issue is being addressed Report back on issues raised and how addressed from the Contractor to the PM and client 	<ul style="list-style-type: none"> Minutes of meetings Draw up PCP 	PM, EC and Contractor

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		<ul style="list-style-type: none"> PM and contractor should present detailed Exploration programme during a meeting with the local community and farm owners. 		
		<ul style="list-style-type: none"> Ensure that relevant stakeholders are adequately informed throughout Exploration and that there is effective communication with and feedback to the PM and client. The contractor shall appoint a person from the Exploration team to take responsibility for the implementation of all provisions of this EMP. 	Meetings and communication.	PM, EC and Contractor.
	Poaching and trapping	No poaching or trapping will be allowed and is a criminal offence.	PM , EC and Contractor to monitor	Contractor.
Dangerous work area	Existence of dangerous/hazardous work areas	<ul style="list-style-type: none"> The work areas must be set out and isolated and demarcated by means of danger tape on a daily basis. The demarcated work area may only contain materials, equipment, and personnel required to execute the work. Once the work for the day is completed, the demarcated area must be cleaned of any spilled materials and waste products. This must be disposed of in the allocated containers. If the work area is dangerous or sensitive, the danger tape should stay in place until work is complete or not sensitive anymore. 	<ul style="list-style-type: none"> Inspections for approval. Record excavation/backfill schedule in the site instruction records. 	PM and Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Threats to the health and safety of Exploration workers.	<ul style="list-style-type: none"> Insufficient provision of safety equipment Negligent behaviour 	<ul style="list-style-type: none"> The contractor must adhere to the regulations pertaining to health and safety, including the provision of protective clothing, failing which the contract may be suspended with immediate effect. Failure to remedy such lack of provision may result in the immediate cancellation of the contract according to the clauses stipulated in the Specific and General Conditions of Contract. The contractor should comply with all relevant labour laws as stipulated by the Labour Act. First aid kits to be readily available in case of injuries 	Regular visual inspection and records kept of safety equipment and materials issued.	PM and Contractor.
		Dust protection masks shall be provided to staff members if they complain about dust.	Regular inspections and attendance to work complains.	PM, EC and Contractor.
		Workers in the vicinity of sources of high noise should wear necessary protection gear.	Regular Inspection	PM, EC and Contractor.
		NO person is allowed to smoke close to fuel storage facilities and in portable toilets at the Exploration site since the chemicals used in chemical toilets are highly flammable.	Regular Inspection.	PM, EC and Contractor.
		Workers should not be allowed to make use of the existing neighbourhood facilities. Potable water must be provided to workers to avoid dehydration.	Regular Inspection.	PM, EC and Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		Portable toilets should be available at the Exploration site in the following ratio: 2 toilets for every 50 females and one toilet for every 50 males.	Regular Inspection.	PM, EC and Contractor.
	Low productivity and increase health risk of workforce due to high temperatures.	<ul style="list-style-type: none"> Provide hats, ample drinking water Provide regular breaks. 	Daily checking of weather forecast.	PM, EC and Contractor.
	Fire incident.	<ul style="list-style-type: none"> Foam fire extinguishers must be in close proximity to fuel kept on site There should be trained personnel to handle this equipment At least two extinguishers should be placed in the workshop. 	Foam fire extinguisher should be available when work commences.	PM, EC and Contractor.
Health and social pathology.	<ul style="list-style-type: none"> Increase prostitution and associated social pathologies and health risks Sex workers are hired from the local communities by the Exploration team. 	<ul style="list-style-type: none"> Prohibit unauthorized people on site and secure Exploration area, while monitoring entrance and exits. Contract penalties. <p>Workers are not allowed to reside on the Exploration site.</p>	<p>Daily monitoring by contractor.</p> <p>Record visitors in a site-visit book</p>	Contractor
	<ul style="list-style-type: none"> Health and safety risks to the workers and public due to uncontrolled access to 	Specify health and safety risk avoidance measures.	Daily monitoring by contractor	Contractor

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
	<p>the public during Exploration</p> <ul style="list-style-type: none"> Unsafe traffic conditions, the lack of personal protective clothing, etc. 			
Alcohol abuse.	Use of alcohol on Exploration site.	At no stage may a Exploration worker be allowed on site under the influence of alcohol.	<ul style="list-style-type: none"> Daily monitoring by contractor. Spot checks. 	PM and Contractor
Lack of privacy.	Intrude on neighbouring properties.	Under no circumstance are workers allowed to intrude on neighbouring properties.	Regular monitoring by PM.	PM and Contractor
EXPLORATION AREA				
Disorderly and unwanted settlement in the road reserve	Informal market stalls providing services to Exploration workers	<ul style="list-style-type: none"> In consultation with the regional council and traditional authorities, to determine the conditions for of market stalls next to the road and at lay-byes. No settlement will be allowed. 	<p>Set conditions for market stalls</p> <p>Regular inspection of site</p>	Contractor
Exploration site	Visual nuisance of the Exploration activities.	<ul style="list-style-type: none"> The boundaries of the exploration area shall be demarcated prior to any work commencing on the site The exploration area should be clearly marked. 	PM and Contractor should agree on demarcation lines.	PM, EC and Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
	Improper conduct on Exploration site.	<ul style="list-style-type: none"> The exploration area should adhere to the following requirements: Access should be controlled and only workers allowed within the boundaries of the campsite: <ul style="list-style-type: none"> Records should be kept and all visitors should sign in and sign out of a visitors logbook The contractor should in no way permit or allow prostitution to take place at the Exploration area. 	Regular visual and record inspection by the PM.	PM, EC and Contractor.
Campsite Establishment				
Negative impact on the social and ecological environment.	Establishment of campsite.	<ul style="list-style-type: none"> One campsite should be established for all exploration activities The contractor must negotiate the use of existing facilities before considering entering new terrain. The contractor must receive approval to use a facility or land in writing. This approval must state the remuneration and conditions of use. Devise a layout for the site so that internal circulation of workers and vehicles in relation to the various Exploration functions is optimised. 	Contractor and PM should agree on a satisfactory area.	Contractor with approval of the Client, EC and PM
	Conduct on campsite.	<ul style="list-style-type: none"> No one is allowed to reside on the campsite, save for exploration personnel. 	Daily monitoring by contractor.	Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		<ul style="list-style-type: none"> The campsite may act as a facility for the storage of exploration material, temporary stockpile sites, and fuel installations etc, required by the Contractor or subcontractors and suppliers. Materials must be stored in a separate closed-off premise that is sufficiently prepared to protect the environment for pollution, such as impermeable floors, closed containers and a security fence. 		
	Stockpiling materials on site.	<ul style="list-style-type: none"> Stockpile materials such as bricks, sand, and stones in neat piles store sensitive materials such cement, hazardous materials, and consumables separately in a demarcated area on site. Store only small amounts of materials on site to avoid unsupervised use that may lead to accidents and spills. 	<ul style="list-style-type: none"> Daily monitoring by contractor. Regular visual and records inspection by the PM. 	PM and Contractor.
		<ul style="list-style-type: none"> Stockpiles must be of a safe height of less than 2m high and 45° slope angle. Cement stacks must not be higher than 1.5m. Protect all fluids containers from low temperatures to avoid leaks and pollution. 	Regular visual and records inspection by the PM.	PM and Contractor.
BIOPHYSICAL ENVIRONMENT				
Drainage issues.	Surface run-off.	Surface protection work is recommended on the river bed.	Daily inspection of the surface protection work.	EC, Contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Soil pollution	Garbage, cement, concrete, sewage, chemicals, fuels, oils or any other objectionable or undesirable material.	<ul style="list-style-type: none"> Hazardous waste should be disposed of in the prescribed manner in order to prevent contamination of soils (see waste management heading). In case of accidental spills, the contaminated soil must be suitably disposed of in a container for hazardous waste. 	Daily monitoring and regular visual inspection by contractor.	EC, Contractor
	Soil pollution by fuel leaks	If fuel is stored at the Exploration camp, fuel tanks must be properly bunded. The volume of the bunded area must be sufficient to hold 1.5 times the capacity of the storage tanks. The floor of the bunded area must be impermeable and the sides high enough to achieve the 1.5 times holding capacity.	Daily monitoring by Contractor and regular visual inspection by PM	EC, Contractor
		Drip trays should be available for all equipment that is intended to be used during Exploration. These trays should be placed underneath each vehicle while the vehicles are parked. The drip trays should be cleaned every morning and the spillage handled as hazardous waste.	Daily monitoring and regular visual inspection by contractor.	EC, Contractor
	Soil pollution by cement mixed on the ground.	Under no circumstances should cement be mixed on open soil. A designated metal container should be made available for this purpose.	Daily monitoring by Contractor and regular visual inspection by PM	EC, Contractor
	Cleaning of equipment.	All cleaning of equipment should take place within the Exploration site and the water from washing operation should be collected in a tank and disposed of in agreed manner.	Daily monitoring by Contractor.	EC, Contractor
	Heavy vehicles/ movement of vehicles across site.	The movement of vehicles to and across the site should be controlled. Exploration material required should be moved to where it is needed	Daily visual inspection and	EC, Contractor

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		by means of wheelbarrows (when possible) instead of trucks thereby minimizing the impact on the soil.	monitoring by Contractor.	
EXPLORATION BOREHOLES/TRENCHES/PITS	Exploration activities	<ul style="list-style-type: none"> The contractor in consultation with the environmental consultant and/or PM shall visit all potential exploration sites prior to excavation. The engineers and surveyors must then draft a plan for approval before commencement of excavations. This plan must indicate the required resources and sensitive areas that may not be mined (indication of the mature trees). No removal of trees with a stem diameter of 200mm or more. Protect clusters of trees and individual trees with a space buffer of at least 5m. The top 150mm of topsoil must be stored separately for use to rehabilitate the borrow pit. The removal of material at excavation sites shall be focused where the least significant vegetation exists. The contractor shall liaise with the applicable local residents regarding the location of excavation sites. No drilling may be done on any sensitive or open space areas. 	Contractor and environmental consultant to visit all potential excavation sites.	EC, Contractor
WATER CONSERVATION				

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Irresponsible use of water.	Water wastage due to careless practices during Exploration.	<ul style="list-style-type: none"> Establish a water plan which, should include at least the following: <ul style="list-style-type: none"> A description of: <ul style="list-style-type: none"> The source of the water Where and how the water will be stored How the water will be distributed/utilised Describe measures that will be taken to conserve water at each of the above-mentioned phases Educate the work force on sustainable and effective use of water, e.g. clean equipment in containers. No member of the exploration team is allowed to wash clothes OR vehicles on the Exploration site. 	Daily inspections and condition reports.	PM, EC and contractor.
	Leaks from tanks and taps.	Water should be used sparingly throughout the Exploration of the development. It is the responsibility of the site coordinator to ensure that water conservation is strictly enforced.	Daily inspections and condition reports.	PM, EC and contractor.
		Water tanks / taps must be fixed. The water tank or taps must have water meters and be accessible to visual inspection. All faulty and leaking taps and pipes shall be immediately repaired.	Daily inspections and condition reports.	PM, EC and contractor.
Groundwater contamination.	Refuse, garbage, cement, concrete, chemicals, fuels, oils or any other	<ul style="list-style-type: none"> Accidental spills must be cleaned immediately to avoid the pollution of the wetland, and ground water, since the soil around the site is highly permeable. 	Inspection daily, reporting, and regular clean up.	PM, EC and contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
	objectionable or undesirable material.	<ul style="list-style-type: none"> No member of the Exploration team is allowed to wash clothes OR vehicles on the Exploration site. 		
CONSERVATION OF VEGETATION				
Loss of biodiversity	Clearing of vegetation (removal of trees etc).	<ul style="list-style-type: none"> The area to be constructed on the site, as well as lay-down areas, access routes, etc should be clearly demarcated. The workforce must be instructed to operate within these boundaries. Any activity resulting in the chopping down of trees or removal of vegetation without the required authorisation is strictly prohibited. All protected tree species will be tagged so that they are visible during Exploration works. 	Regular review of photographic records. Take photographs before Exploration starts as a record. Monitoring by the EC	PM, EC and contractor.
	Planting of alien vegetation.	<ul style="list-style-type: none"> No alien vegetation may be introduced to the site in the form of seeds or plants, for beautification or any other reason. At the end of Exploration all alien vegetation that has established should be eradicated. 	Regular inspection of site vegetation by the EC.	PM, EC and contractor.
WASTE MANAGEMENT:				
Exploration waste.	Incorrect or infrequent disposal of building rubble.	Exploration waste should be stored in skips and should regularly be removed off the site for disposal at an applicable municipal waste disposal site.	Regular inspection on site.	PM, EC and contractor.
	Exploration waste blown by wind (e.g., cement bags).	Empty cement bags, plastics, wrapping waste, strapping, etc. to be secured in containers for general waste to prevent wind-blown waste.	Daily inspection and clean up.	PM, EC and contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
Increased general waste.	Domestic waste from Exploration team.	<ul style="list-style-type: none"> Waste shall be separated according to cardboard/paper materials, plastic, bottles and tins. The various waste types shall be disposed of at appropriate municipal and recycling facilities. Appropriate containers shall be placed on site for waste separation and the workforce trained sensitised accordingly. Only the general waste, which cannot be recycled shall be disposed of at the municipal waste disposal facility. 	Daily inspection and clean up.	PM, EC and contractor.
Domestic waste.	Domestic waste from Exploration team.	<ul style="list-style-type: none"> The workforce must be sensitised to dispose of waste in a responsible manner and not to litter, not at the Exploration site and not at the campsite. Sufficient waste bins should be supplied. 	Daily inspection and clean up.	PM, EC and contractor.
		Domestic waste which cannot be recycled should be stored in a skip and removed via truck once a week.	Regular inspection.	PM, EC and contractor.
Hazardous waste.	Accidental / negligent spillages from equipment working on site.	<ul style="list-style-type: none"> Spillages of any potentially toxic materials, whether by accident or through negligence, must be scooped up immediately into drums. Contact Wesco Group to salvage the spilled materials (see Appendix A for the contact details). 	Daily inspection and clean up.	PM, EC and contractor.
	Storage of hazardous materials.	Hydrocarbon products waste, oil sludge, oily rags, contaminated spill clean-up materials, contaminated soils and other hazardous materials waste must be kept off-site or in a dedicated separate container on	Daily inspection and clean up.	PM, EC and contractor.

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
SOCIAL ENVIRONMENT				
		site. These containers must be locked and only accessible by the site foreman. Wesco Group should be approached to collect these wastes periodically or as needed.		
Ablution waste.	Exploration team.	<ul style="list-style-type: none"> Only portable chemical toilets will be used on site and at the campsite. Under no circumstances may the waste from these toilets be dumped in the veld. The waste should be removed at least once a week to the nearest municipal sewage site. Alternatively, it may be pumped out into sealable containers and stored until it can be removed by truck. If stored, the containers should be kept out of direct sunlight and should not be stored for longer than a month. People responsible for cleaning these toilets should be provided with latex gloves and masks. Spillage or leakage to be cleaned-up and fixed immediately. 	Daily inspections and clean-up.	PM, EC and contractor.
DUST CONTROL:				
Dust generation.	Dust proliferation due to fines content of soil.	<ul style="list-style-type: none"> Soil stacks should be placed downwind from the main activity areas and from the road detour. All Exploration areas and soil stacks should be regularly wetted. 	Visual monitoring for dust nuisance and safety	PM, EC and contractor.
NOISE CONTROL:				
Noise generation.	Noise from vehicles and Exploration activities.	<ul style="list-style-type: none"> All machinery should be calibrated and maintained regularly. Exploration activities should be discontinued during night-time hours (18h00 to 07h00) and over week-ends. 	<ul style="list-style-type: none"> Daily monitoring. Complaints from neighbours. Records of how these have been addressed. 	PM, EC and contractor.

4.2. Post-Exploration Phase

ENVIRONMENTAL MANAGEMENT IMPACTS REQUIRING MITIGATION	SOURCES OF IMPACTS	MITIGATION MEASURES	MONITORING ACTIONS AND METHODS	RESPONSIBILITY FOR IMPLEMENTATION
Hazardous unattended Exploration site	Temporary structures, equipment, materials, waste and facilities used for Exploration activities.	Clear and clean the Exploration site to the satisfaction of the PM.	Inspection of the site by the PM	PM, EC
Unsightly exploration wells and areas	<ul style="list-style-type: none"> Unrehabilitated exploration areas 	<p>Rip the terrain and access routes and replace the stored topsoil evenly over the terrain.</p> <p>Securely seal exploration boreholes</p>	Inspection by PM , EC after rehabilitation.	Contractor, EC and Engineer.

5. CHAPTER FIVE: CONCLUSION AND RECOMMENDATIONS

5.1. Conclusion

Arising from the analysis by the consultants, the proposed project has land cover/use impacts on the proposed project site. Because land must develop, but with land development, there should not be environmental degradation, thus the EMP provides for the sustainable land development of the energy generating facility.

5.2. Recommendations

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

5.2.1. *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.

5.3. 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.

5.4. 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 issue an Environmental Clearance Certificate (ECC) on condition that the proponent will ensure complete compliance to the developed Environmental and Social Management Plan (ESMP).

6. APPENDIX A: ENVIRONMENTAL AUDIT REPORT



ENVIRONMENTAL COMPLIANCE AUDIT REPORT

PROPOSED MINERAL EXPLORATION ACTIVITIES ON EPL 8290 and
8290 TREKKOPJE, ERONGO REGION -NAMIBIA

PROPONENT: NAMIBIA URANIUM PTY (Ltd)

DOCUMENT DATA SHEET

THE PROPOSED MINERAL EXPLORATION ACTIVITIES ON EPL 8290 and EPL 8298,
TREKKOPJE, 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
EPL	Exclusive Prospecting License
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 Exclusive Prospecting License (EPL) 8290 and 8298 Trekkopje - Erongo Region -Namibia

Period:

This audit report covers the period starting from 17 October 2022 (EPL 8290) and 02 November 2022 (EPL 8298) to date, this was necessitated by the fact that the project proponent conducted reconnaissance work siting the exploration drill points in order to quantify the mineral deposits at the lab as well prior to commencement of the exploration activities on EPL 8290.

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

The proponent, **Namibia Uranium PTY (Ltd)** has identified the economic potential of mineral deposits found in the Erongo Region. The proponent is a holder of a licence to explore a land area approximately 30,000 hectares (ha) inclusive. The area covered by the Exclusive Prospecting Licence (EPL 8290 and 8298), falls within communal land. Namibia Uranium (NU) (PTY) LTD currently holds access to the mineral rights on both EPLs. In this respect, NU plans to undertake mineral exploration activities, primarily targeting uranium ore deposits.

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 8290 and 8298, Trekkopje on the 25th 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 8290 and 8298:

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 8290 and 8295 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 on [page 6](#) lists findings in each area of operation and the auditors have provided suggestions on how to correct where non-compliances were identified.

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 25th 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.

Compliance was categorised in the following:

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

N.B The fact that the proponent has conducted biannual/ environmental audit with the consultant means they are committed to abiding legislations attached to their proposed activities. In every aspect where the Consultant did not have evidence because of the pre-exploration, it was recorded as compliant and hereby recommend that the proponent operates according to the Updated EMP and the Heritage studies undertaken.

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	FC	-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 should be implemented. There are limited tree species within the EPL.
	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'.	C	-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	C	-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>	<p>-All contracts, permits, certificates and other legal documents obtained and on file.</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
Labour and Recruitments	Appointments	<p>-Appointment of contractors and employees and enter into an agreement which includes the EMP.</p> <p>-Ensure that the contents of the EMP are understood by the contractor, subcontractors, employees, and all personnel present on site.</p>	-Contracts on file	Fully Compliant	APRIL/MAY 2026
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>	-Documentation 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
		<ul style="list-style-type: none"> -Have the following emergency plans, equipment, and personnel in place to deal with all emergencies: -Risk Management / Mitigation / Environmental Management Plan / Emergency Response Plan and HSE Manuals. -Adequate protection and indemnity insurance cover for incidents. -Comply with the provisions of all relevant safety standards. -Procedures, equipment, and materials required for emergencies. 	<ul style="list-style-type: none"> -Personal Protection Equipment (PPE) on site and appropriately worn by site workers -Signage related to restricted areas, dangerous areas, and PPE requirements are on site. -Emergency response material on site 		

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Future environmental restoration or pollution remediation if ever required	Restoration Fund/Insurance	-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
Reporting system on monitoring aspects of operations and maintenance as outlined in the EMP	Reporting	-Establish a reporting system to report on aspects of operation and maintenance as outlined in the EMP.	-Bi-Annual Monitoring Reports	Partially-Compliant but to be improved with Consultant's assistance	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
		-Keep monitoring reports (bi-annual reporting) on file for submission with Environmental Clearance Certificate renewal applications where needed.			
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 contactors	-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	Both EPLs are located off the main B2 road. All operational activities may potentially have some impact on the movement of traffic to the site (on the B2 as well as site access roads) when transporting material, supplies and equipment.	<p>-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.</p> <p>-B2 has limited speed signs and the proponent will be abide to those limits as well to set speed limits on the roads leading to the Exploration site.</p> <p>-A valid driver's license will be required to use any motor vehicle while on duty.</p>	<p>-A register of trucks arriving and leaving the site will be kept.</p> <p>-A report should be compiled every month of the daily number of trucks accessing the sites. No accidents were recorded yet during the pre-exploration phase</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
		<p>-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.</p> <p>-Proper traffic management systems in place.</p> <p>-Diversion or management of traffic when required.</p> <p>-Appropriate road signage and warnings should be erected or put up at the site access roads.</p>	<p>-Any complaints received regarding traffic issues should be recorded in the report together with steps taken to mitigate the impacts.</p>		

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<p>-Existing tracks leading to the site should be used and unnecessary new tracks or roads should not be created.</p> <p>-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.</p>			

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>-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
		-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.			

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
		<p>-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.</p>			

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>-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>-The workers and contractors should be obliged to adhere to the following:</p> <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>			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<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>			
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>-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
		-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.			

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).			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
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>-Personnel are to be issued with dust masks for health reasons when needed.</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
		-A complaints register of dust generated or harmful gas emitted from site related activities must be maintained.			
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	<p>-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.</p> <p>-Recycling of solid waste should be encouraged to minimise the amount of waste that goes to landfill.</p> <p>-Adequate temporary ablution facilities must be erected on site to better manage sewage.</p>	<p>-Regular of waste from site to approved disposal /management sites.</p> <p>-Regular removal of sewage from site and maintenance by the responsible contractor.</p>		

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	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>-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>-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
	Accidental spills of fuel, and other chemicals that may be used on site might occur.	<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>-Contaminated soil must be transported away from the site to an approved, appropriately classified waste disposal site. Contaminated soil should be remediated.</p>			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
Heritage Impact	Sites or objects with archaeologically 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

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
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>			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
		<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> <p>-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.</p>			

Aspect	Activity	Action / Management measures recommended in 2022 and as updated in 2025	Proof of Compliance	*Compliance Status	Next EMP Compliance Update/Reporting
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 8290 and 8298 by Namibia Uranium.

Table 4: Audit Findings in General

FINDING	Recommended actions
<p>Archaeological findings identified that there are War cemetery and stone artefacts outside EPL boundaries which must be communicated to the exploration team before site mobilisation to avoid posing risk to the identified sites.</p> 	<p>-Engage relevant authorities to mark of any identified archology/cultural findings. If there is need to remove, NHA should be engaged to facilitate relocation.</p>
<p>Access road to be upgraded and avoid by all means creating several sand tracks to the site.</p>	<p>Upgrade the alternative route and establish a drivable gravel road.</p>
<p>Establishing safety signs and Re-labelling of the EPL boundaries with EPL number and proponent details.</p>	<p>-All boundary signs were fading and not clearer enough for reading so they need re-labelling. Some of the Exploration/ sampling pits were labelled and some were not labelled.</p> <p>-Road and safety signs are needed to warn/ remind workers and visitors on safety cautions</p>

Open and unused sampling pits



Unused open pits should not be left for a longer period. Deep pits should be barricaded to avoid trapping animals.

5. CONCLUSION

The site wide Environmental Compliance Audit conducted on EPL 8290 and 8298 informed this audit report. If properly implemented, will help to comply to the existing updated 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.

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 pictures show unbaricaded open pits where samples were extracted within the EPL. The project proponent is being advised to avoid leaving open pits for a longer period that can be a trap for small mammals.</i></p>

8. APPENDIX C: COPY OF PREVIOUS ISSUED ENVIRONMENTAL CLEARENCE 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

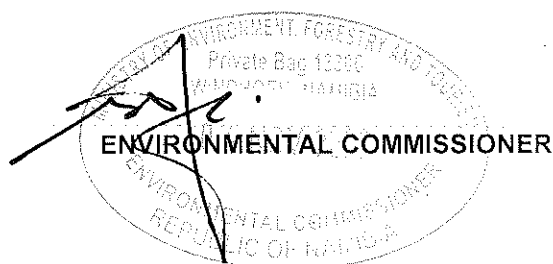
Sion Dimbulukweni Mwatukange
P. O. Box 3878, Ongwediva

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

**The Proposed Mineral Exploration Activities on Exclusive Prospecting
Licence (EPL) No. 8298, Trekopje, Erongo Region -Namibia**

Issued on the date: **2022-11-02**
Expires on this date: **2025-11-02**

(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 26461) 284 2111

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

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

NOTIFICATION OF DECISION

REF NUMBER: ECC- AP10342

DATE OF ISSUE: 02 NOVEMBER 2022

DETAILS OF PROPONENT:

Sion Dimbulukweni Mwatukange
P. O. Box 3878
Ongwediva
Namibia

Dear Sir/ Madam

SUBJECT: NOTIFICATION ON APPLICATION FOR ENVIRONMENTAL CLEARANCE TO UNDERTAKE THE PROPOSED LISTED ACTIVITY: The Proposed Mineral Exploration Activities on Exclusive Prospecting Licence (EPL) No. 8298, Trekopje, Erongo Region –Namibia.

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 10342** for Environmental Clearance Certificate to undertake a listed activity has been reached.

DECISION

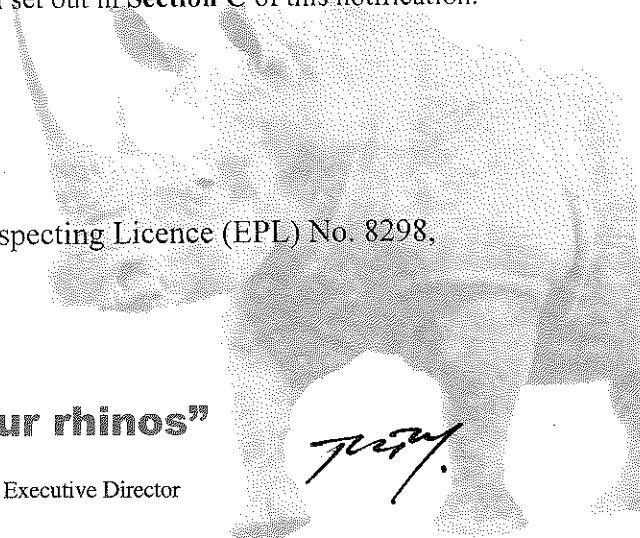
An Environmental Clearance Certificate (ECC) to undertake the listed activities specified in the environmental assessment report and draft management plan dated June 2022, is granted (**ECC- AP10342**). The applicant / proponent is therefore advised to comply with conditions of approval set out in **Section C** of this notification.

A. DETAILS OF THE PROPOSED ACTIVITY

A1: TITLE OF THE PROPOSED ACTIVITY

The Proposed Mineral Exploration Activities on Exclusive Prospecting Licence (EPL) No. 8298, Trekopje, Erongo Region –Namibia.

"Stop the poaching of our rhinos"



A2: DETAILS OF ASSESSMENT PRACTITIONER

EnviroPlan Consulting Cc

Enquiries: Mr. T E. Kasinganeti

Tel: +264813634904

E-Mail: tendai@enviropplanconsult.com

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.	The Proposed Mineral Exploration Activities on Exclusive Prospecting Licence (EPL) No. 8298, Trekopje, Erongo Region –Namibia.

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- AP10342**) 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

Stamp: ENVIRONMENT, FORESTRY AND TOURISM
Private Bag 1336
Gaborone, BOTSWANA

ANNEXURE A: - SITEMAP / SITE LAYOUT

MINERAL EXPLORATION ACTIVITIES ON EPL 8298, TREKOPJE, ERONGO REGION -NAMIBIA

