

ENVIRONMENTAL MANAGEMENT PLAN:
FOR THE PROPOSED MINERAL EXPLORATION OF BASE AND RARE METALS,
DIMENSION STONE, INDUSTRIAL MINERALS, AND PRECIOUS METALS ON
EXCLUSIVE PROSPECTING LICENSE NO. 8832
KARASBURG DISTRICT, KARAS REGION - NAMIBIA
ECC APPLICATION NO.: 250424005747

December 2025

COMPILED BY



SS CONSULTANTS

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LIST OF ABBREVIATIONS

DEAF	Department of Environmental Affairs and Forestry
DWA	Department of Water Affairs
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
GG & GN	Government Gazette & Government Notice
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry & Tourism
MIME	Ministry of Mines, Industries and Energy
PPE	Personal Protection Equipment

1 INTRODUCTION

SS Consultants CC (herein referred to as the Consultant/ SS) has been appointed by Ontsa Mining Close Corporation (herein referred to as *the Proponent*) to apply for and obtain an Environmental Clearance Certificate (ECC). The Proponent intends to explore for base and rare metals, dimension stone, industrial minerals, and precious metals on EPL No.8832. Prior to commencing with proposed exploration activities, an Environmental Impact Assessment (EIA) process undertaken by the Proponent is required, thus the 'pending' status for the application rights for the proposed exploration activities for base and rare metals, dimension stone, industrial minerals, and precious metals on EPL No.8832 as shown in *Figure 1-1*.

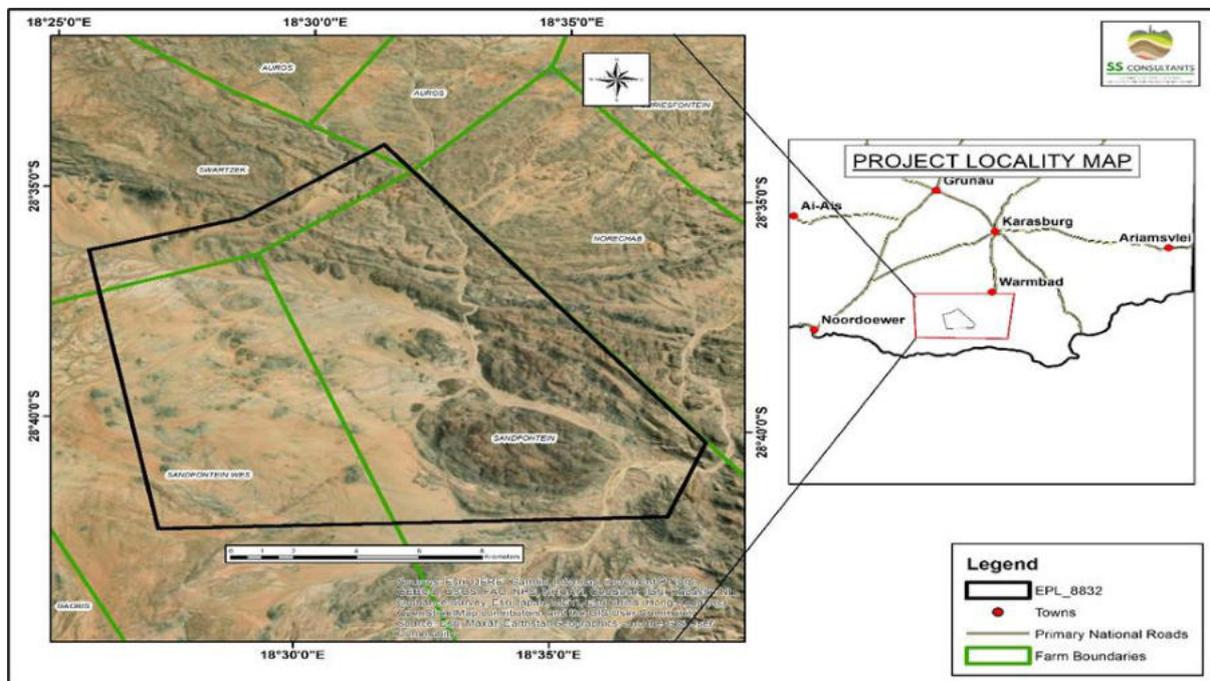


Figure 1-1: Locality of EPL 8832

1.1 Purpose of the Environmental Management Plan

The EMPs are structured as detailed matrices. Each matrix entry corresponds to a specific **Activity or Process**, identifying associated environmental aspects defined by International Organisation for Standardization (ISO) 14001:2004 as *elements of an organization's activities, products, or services that can interact with the environment. The environment encompasses the surroundings in which an organization operates, including air, water, land, natural*

resources, flora, fauna, humans, and their interrelations. For each aspect, the EMP outlines the corresponding **Environmental Impacts**, which are any changes to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects. The matrices specify the **Management Actions** required to address these impacts, detailing the responsible persons and the **Timing** for each action, thereby facilitating the effective implementation of the proposed mining project.

The aim of this Environmental Management Plan (EMP) is to detail the actions required to effectively implement mitigation and management measures relevant to EPL 8832 project activities. The interventions are required to minimise or avoid negative impacts associated with the proposed project activities, as identified and assessed in chapter 5 of the EIA-Scoping Report.

The primary objectives of an EMP include:

- **Mitigation of Environmental Impacts:** Outlining specific measures to prevent, reduce, or offset adverse environmental effects identified during the Environmental Impact Assessment (EIA) process.
- **Monitoring and Compliance:** Establishing procedures for regular monitoring to ensure that mitigation measures are implemented effectively and that environmental standards are maintained throughout the project lifecycle.
- **Institutional Roles and Responsibilities:** Defining clear roles and responsibilities for all stakeholders, including project proponents, contractors, and regulatory authorities, to ensure accountability and effective implementation of the EMP.
- **Legal Compliance:** Ensuring that all project activities comply with national environmental legislation, including obtaining necessary Environmental Clearance Certificates (ECCs) before commencing any listed activities.

The EMP is not a static document; it is subject to periodic review and updates to accommodate changes in project scope, environmental conditions, or legislative requirements. All personnel involved in the project are legally obligated to adhere to the EMP's provisions, and non-compliance may result in legal penalties, including fines or imprisonment.

By integrating environmental considerations into project planning and execution, the EMP plays a pivotal role in balancing developmental objectives with ecological sustainability, thereby contributing to the long-term well-being of Namibia's environment and its people.

1.2 Phases of the Proposed Mineral Exploration Activities

The purpose of this Environmental Management Plan (EMP) is to define the actions needed to implement mitigation and management measures for all project activities, including the planning, prospecting and exploration, and decommissioning and rehabilitation phases. This aims to minimise or avoid negative impacts identified and assessed in Chapter 5 of the EIA Scoping Report. (see Table 1-1).

Table 1-1: Phases of EPL 8832 Project activities

Phase	Management Requirement
Planning	<p>The Proponent prepares all administrative and technical documentation required for on-site works.</p> <ul style="list-style-type: none"> • Secure necessary permits and authorisations from relevant national and local authorities. • Initiate recruitment and procurement processes in readiness for upcoming exploration activities and site maintenance.
Prospecting & Exploration	<p>Continue recruitment and procurement activities to support exploration and maintenance efforts.</p> <ul style="list-style-type: none"> • Conduct detailed mineral resource investigations, including sampling, mapping, geophysics and drilling., • Maintain the site infrastructure, equipment, and machinery under the Proponent's oversight.
Decommissioning	<p>Exploration activities within the EPL area are formally concluded.</p>

	<ul style="list-style-type: none">• Evaluate whether decommissioning is warranted—based on exploration outcomes or shifts in commodity market dynamics.• Prior to decommissioning, implement site rehabilitation measures to ensure ecological restoration and compliance with applicable regulations
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1.3 Environmental Regulatory Requirements

The proposed exploration activities in the EPL 8832 cannot be undertaken without an Environmental Clearance Certificate (ECC) because they are listed in the Environmental Management Act, 2007, (Act No. 7 of 2007) among the activities that may have significant negative impacts on the receiving environment. Obtaining an ECC requires submission of both an Environmental Scoping Report and an Environmental Management Plan, which together support the decision-making process and ensure transparency and stakeholder involvement.

2 DESCRIPTION OF MITIGATION MEASURES

Table 2-1: Environmental Risk Assessment and Mitigation Measures.

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
ENVIRONMENTAL			
Access and Site preparation	<ul style="list-style-type: none"> - Introduction of alien species (plants and weeds can accidentally be introduced) - Disturbance and injury to residing organisms 	<ul style="list-style-type: none"> - Ensure the potential introduction and spread of alien plants is prevented, and - Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants. - Eradicate weeds and alien species as soon as they appear 	<ul style="list-style-type: none"> - Exploration Manager/ER - Employees, contractors - ECO
	<ul style="list-style-type: none"> - Damage to cultural heritage resources 	<ul style="list-style-type: none"> - Implementation of the Chance Find Procedure, - Ensure awareness about possible heritage finds and report all finds that could be of heritage importance - Exploration manager to visit the site and determine whether work can proceed without damage to findings. 	

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
General exploration activities	<ul style="list-style-type: none"> - Visual disturbances - Change of Landscape - Dust emissions and 	<ul style="list-style-type: none"> - Barriers or fences shall be used if drilling occurs in locations that may affect residents or livestock, - Residents need to be informed at least two weeks in advance that drilling operations are within 1km of their property, - Apply dust suppression where possible, - All vehicles and machinery / equipment to be shut down or throttled back between periods of use, - Restrict speed of vehicles (<30km/h), - Maintain continuous communication with I&APs to identify concerns and mitigation measures 	<ul style="list-style-type: none"> - Exploration Manager - Employees, contractors - ECO

	<ul style="list-style-type: none"> - Soil and Groundwater contamination 	<ul style="list-style-type: none"> - Spill kits and absorption material available during fuel delivery, storage or use - Accidental spills and leaks to be cleaned soonest - Spills to be reported to the exploration manager - Fuel spills of greater than 200 litres to be reported to the authorities - Plant and equipment to be well maintained and serviced regularly (maintenance and service schedules in place), - In the field, hydrocarbons under 200 litres can be used for mobile refueling or servicing - Bulk fuel will be stored in adequate containment areas (on a non-porous floor, in a bunded area, capable of containing 110% of the volume stored) - Ensure drill pads and spill kits are in place, - Consider alternative sites when the water table is too high, - Drill system should be dug to direct any 	
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ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
		accidental spills into sumps, - Wastewater shall be contained, - Where possible, water from existing water sources shall be used with a compensation agreement with - the farm owner in place, - Properly functioning chemical toilets shall be used only	
Clearing Vegetation for access routes and Camp setting	- Loss of plant species - Loss of habitat - Change in landscape	- Use existing roads for access to avoid new tracks and cut lines - Minimize clearance areas through proper planning of exploration activities and promote revegetation of cleared areas upon completion of exploration activities	- Exploration Manager/ER - Employees, Contractors - ECO
SOCIAL			

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
General exploration activities	<ul style="list-style-type: none"> - Conflicting land uses and Consents - Disruption of farm operations (leaving gates open, loss of farming area, interference at waterpoints - Potential conflict with farm owners and neighbours (suspicious movement, poaching, stock theft, field fires, etc.) 	<ul style="list-style-type: none"> - Ensure documented permission of who may enter the farms for exploration purposes is provided to the farmers - No unauthorized movement on farms is allowed, - Farmers should always have access to all farm areas - Existing water points and feeding area must remain unaffected. 	<ul style="list-style-type: none"> - Exploration Manager/ ER - Employees, Contractors - ECO
Human Interactions/ Relations	<ul style="list-style-type: none"> - Community Exposure / Public to sexual transmitted diseases due to practice of unsafe sex - Drug and alcohol abuse 	<ul style="list-style-type: none"> - Ensure training of staff in Health Education - Ensure adherence to the relevant health and safety legislation. - Ensure EMP training, and its execution thereof. - Ensure a copy of an EMP is present on site at all time 	
ECONOMICAL			
Job creation, Business Opportunities	<ul style="list-style-type: none"> - Creation of new job opportunities for 	<ul style="list-style-type: none"> - Ensure knowledge and skill transfer during interactional meetings 	<ul style="list-style-type: none"> - Exploration Manager

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
	<p>local and regional people</p> <ul style="list-style-type: none"> - Potential markets for the local businesses. 	<ul style="list-style-type: none"> - Adopt recruitment policy ensuring equal job opportunities for the locals skilled and unskilled. - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible 	

3 ORGANIZATIONAL ARRANGEMENTS

3.1 Roles and Responsibilities

3.1.1 Proponent

The Proponent bears ultimate responsibility for every phase of the project and for all resulting impacts. It is their duty to appoint an Environmental Control Officer (ECO) and to ensure robust environmental compliance across all operations.

Below are the recommended actions, roles, and responsibilities that the Proponent should undertake as part of managing impacts under this EMP:

- **Engage an Environmental Control Officer (ECO), external consultant, or qualified in-house professional** to lead, refine, and execute the EMP. This individual should foster an environmental culture by raising awareness among the field workforce throughout the project's lifespan.
- **Allocate sufficient human and financial resources** to support the implementation of mitigation measures and ensure effective environmental management over the planned life cycle of the mine.
- **Design and deliver a streamlined environmental induction and awareness program** for all project personnel.
- **Perform both internal and external monitoring** of implemented actions and strategies. At project closure, the ECO (or external consultant/in-house resource) should prepare a final Environmental Monitoring Report for submission to regulators, marking the conclusion of the exploration phase.
- **Develop and integrate a monitoring program** that aligns with the company's broader Environmental Management System (EMS), and that can also support any future Environmental Impact Assessments (EIA) for potential expansion of delineated resources.

All responsibility for executing these recommendations lies with the Proponent. They must provide the necessary resources for implementing this updated EMP and establish an

independently managed funding mechanism, not controlled by the exploration company, to cover decommissioning and post-project environmental liabilities. The Proponent is also responsible for ensuring that all workforce members understand the provisions and objectives of this EMP.

It is strongly recommended that the Proponent take all appropriate steps to enact these EMP recommendations to enable the successful planning, prospecting, exploration, decommissioning, and construction of supporting infrastructure (e.g., roads, water, energy supply) within EPL 8832.

3.1.2 Exploration Manager (EM) / Employer's Representative (ER)

The Proponent is required to appoint an **Exploration Manager**, who will also fulfill the role of **Employer's Representative**, with the following core responsibilities:

- Act as the onsite project manager and lead implementation efforts.
- Ensure that a copy of the EMP is always present onsite, be accountable for its maintenance, and make any necessary updates or revisions.
- Oversee induction processes to ensure all employees and contractors complete both health & safety and EMP orientations before commencing work.
- Execute all Employer obligations in compliance with relevant legislation and the Exploration Phase EMP.
- Confirm that all environmental permits and authorizations have been properly secured.
- Collaborate with the Environmental Control Officer (ECO) to devise and implement environmentally responsible solutions to challenges arising during the project.
- Halt operations immediately if a serious environmental risk or impact is suspected and promptly notify the Proponent with full reasoning.
- Enforce compliance with EMP conduct rules, including the power to issue fines for violations.
- Suspend activities or have personnel/equipment removed where environmental safeguards are not being observed, until corrective actions are taken.

- Provide regular reporting to the Employer on EMP compliance, incorporating input from the ECO or an independent environmental auditor.
- Maintain transparent communication channels between the Employer, ECO, and interested & affected parties concerning environmental issues.
- Attend routine site meetings and inspections to monitor and oversee compliance and project progress.

These duties reflect the structured approach documented in current EMP frameworks, which clearly define the roles and accountabilities of the Exploration Manager (also referred to as the Proponent in some EMPs) in managing environmental compliance and permit administration for exploration activities

3.1.3 Environmental Compliance Officer (ECO)

The ECO is tasked with overseeing and enforcing compliance with the EMP and environmental authorizations throughout the project. Key duties include:

- **Support to the ER:** Assists the ER and contractor in obtaining required environmental permits and ensures compliance with regulatory requirements and the EMP
- **Technical and advisory role:** Provides input to the ER, contractor, and workforce in developing environmentally responsible solutions for emerging challenges
- **Environmental monitoring and inspections:** Conduct regular site inspections per EMP requirements, ranging from weekly to monthly depending on project phase and reports non-compliance promptly to the ER
- **Audit and reporting functions:** Compiles environmental audit and monitoring reports, including photographic evidence, and submits findings to the ER and relevant authorities. Also manages snag lists and final close-out reporting upon project completion
- **Compliance enforcement:** Recommends the issuance of fines and advises on the removal of personnel or equipment that contravenes EMP provisions
- **EMP review and improvement:** Conducts periodic reviews typically annually and recommends additions or revisions to the EMP based on operational feedback and monitoring outcomes

- **Training oversight:** Ensures that environmental awareness training is provided to all project personnel. Confirms that contractor-delivered training covers relevant legislation, EMP elements, roles/responsibilities, conduct rules, fines, mitigation measures, and health & safety topics
- **Record-keeping:** Maintains detailed logs of environmental control activities, including photographic records, training logs, and incident registers
- **Stakeholder liaison and coordination:** Facilitates communication between the Proponent/ER, I&APs, and regulatory bodies on environmental matters
- **Meeting attendance:** Participates in routine site meetings and inspections to coordinate environmental compliance and progress oversight.

3.1.4 Employees and Contractors

All employees and contractors must:

- **Always comply with relevant environmental legislation and the EMP**, ensuring their activities align with both legal obligations and the plan's requirements
- **Complete environmental awareness training and induction programs** before beginning any on-site work
- **Deliver environmental awareness presentations or inductions** to all site personnel prior to commencement of work, covering site-specific environmental risks, procedures, and conduct expectations.
- **Maintain records of training and induction sessions**, including participant lists, presentation content, and scheduling details
- **Participate in regular site meetings and environmental inspections**, contributing to ongoing compliance monitoring and communication

3.2 Permits

All required permits must be secured from the appropriate Namibian authorities:

- **Environmental Clearance Certificate (ECC)** issued by the Environmental Commissioner at MEFT–DEAF. This must be submitted for renewal every three years,

amended if project parameters change, transferred if ownership changes, or formally cancelled if the project is discontinued.

- **Exclusive Prospecting Licence (EPL)** certificate from the Ministry of Mines, Industries & Energy (MIME), to be renewed as required.
- **Wastewater (effluent) discharge permit**, obtained from the Water Affairs Division at MAFWLR.
- **Fuel storage (consumer installation) certificate**, required if onsite storage exceeds 600 litres, issued by MIME under petroleum regulations
- **Permits for removal or relocation of rare or endangered plant species**, to be obtained from the Directorate of Forestry at MEFT.

3.3 Site Induction

3.3.1 Training and Awareness

- All site staff and contractors must undergo EMS/EMP environmental awareness and induction training before starting work
- The Exploration Manager and ECO must ensure that training is sufficient and appropriate for all levels of site personnel.
- A copy of the EMP must be kept onsite and made accessible to all employees, and all site personnel must adhere to it.
- EMP training must be completed by every worker, including contractors and drilling personnel, in line with regulatory requirements.

These practices align with Namibian EMP protocols requiring that personnel be appropriately trained on mitigation measures and aware of key environmental procedures

3.3.2 Occupational Health and Safety (OHS)

- All project personnel shall receive a comprehensive induction upon commencing work, with periodic refresher courses as necessary.
- Inductions should cover site-specific health and safety and operational hazards, including risks from handling equipment and materials.

- Adequate personal protective equipment (PPE) including gloves, safety boots, ear protection, dust masks, and eye protection must be provided and worn at all times.
- All workers must understand the relevant health, safety, and environmental considerations specific to their role.

These measures reflect standard requirements for onboarding and safety compliance in EMPs

3.3.3 Environmental and Emergency Response

- The Exploration Manager/ Employer's Representative must develop a site-specific Emergency Response Plan, including procedures for accidents, spillages, and health emergencies.
- A fully equipped first-aid kit must be kept onsite, with at least two to three personnel trained in first aid.
- Emergency contact details for local police, fire, and ambulance services should be clearly displayed on a site notice board.

4 Communication between Parties

A proactive, collaborative communication framework must be maintained among all stakeholders to anticipate, prevent, or minimize environmental impacts rather than reacting post-facto. This approach is particularly essential to prevent irreversible environmental damage, such as unnecessary track creation or disturbance to protected vegetation. Regular dialogue, transparent reporting, and joint planning help avoid negative impacts before they occur, consistent with best-practice EMP communication strategies.

5 LEGAL AND REGULATORY FRAMEWORK: PERMITS AND LICENSES

This chapter details the key Namibian legislation, policies, and guidelines essential to conducting a compliant Environmental Impact Assessment (EIA) and effective Environmental Management Plan (EMP). It provides clarity to the Proponent, affected and interested parties, and decision-makers at MEFT–DEA about statutory obligations and expectations.

5.1 Regulatory Foundations

- **Environmental Management Act (EMA) No. 7 of 2007** and its **Environmental Impact Assessment Regulations (Government Notice No. 4878 GN 30, 2012)** form the statutory basis for EIAs in Namibia. These instruments govern screening, public participation, the issuance of Environmental Clearance Certificates (ECCs), and monitoring procedures
- **Minerals (Prospecting and Mining) Act No. 33 of 1992**, as amended, along with associated regulations, regulates all aspects of mineral exploration, licensing (including EPLs), renewals, transfers, cancellations, and ongoing obligations under the EPL regime

5.2 Application to the EMP

- The EMP was developed in accordance with the EMA and EIA Regulations, reflecting conditions tied to obtaining an **Environmental Clearance Certificate (ECC)** for listed exploration activities
- The Proponent must also comply with the Minerals Act’s provisions regarding EPL administration and operational obligations, as enforced by the Ministry of Mines and Energy (MME)

5.3 Permits & Approvals

Under Section 8(e) of the EIA Regulations, and consistent with EPL requirements, the legal section of this EMP specifies the principal approvals and permits required for project activities. These include, but are not limited to:

- Environmental Clearance Certificate (ECC) under EMA
- Exclusive Prospecting Licence (EPL) under the Minerals Act
- Other permits such as effluent discharge, fuel storage, or relocation of protected species, which are detailed in **Error! Reference source not found.**

A comprehensive list of legal and regulatory obligations is provided in the Scoping Report as a complementary reference.

Table 5-1: Legal and Regulatory Frameworks in terms of permits and licenses for the project activities

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Section 27 mandates that projects with potential environmental impacts undergo an Environmental Assessment; regulations detail required principles and procedures, including ECC issuance, amendment, renewal, or cancellation	<p>The EMA and its regulations should inform and guide this EA process.</p> <p>Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue. For ECC amendment or cancellation, the MEFT should be notified.</p> <p>Contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT), Office of the Environmental Commissioner: Mr. Timoteus Mufeti</p> <p>Tel: +264 61 284 2701</p>
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	<p>Details requirements for public consultation within a given environmental assessment process (GN 30 S21).</p> <p>Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).</p>	<p>Contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT), Office of the Environmental Commissioner: Mr. Timoteus Mufeti</p> <p>Tel: +264 61 284 2701</p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	Section 48 (3): To enable the Minister to consider any application referred to in section 47 the Minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice.	<p>The Proponent should ensure that all necessary permits/authorizations, including the certificate for the EPL are obtained from the Ministry of Mines and Energy (MME).</p> <p>Contact person and details at the MME (Mining Commissioner): Mrs. Isabella Chirchir</p> <p>Tel: +264 61 284 8251.</p>
	Section 52 (1) (a) requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder.	The Proponent should timely enter into and sign access and land use agreement (consent) with the land user (custodian) MEFT's Wildlife & National Parks and affected farmer prior to undertaking any activities on the EPL (including mobilization).

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Water Resources Management Act (No 11 of 2013)	<p>Ensure that the water resources of Namibia are managed, developed, used, conserved, and protected in a manner. Therefore, a Groundwater Abstraction & Use Permit should be applied for. The Permit is required for all commercial and industrial water uses. Although, exploration is not entirely commercial, the associated activities such as drilling fall under industrial activities, thus, the need to apply for an abstraction permit (this would apply if the Proponent abstracts water outside the EPL area)</p>	<p>The Water Permit should be applied from the Ministry of Agriculture, Water and Land Reform (MAWLR)</p> <p>Department of Water Affairs (DWA): Contact: Mr. Franciskus Witbooi Division: Water Policy and Water Law Administration Division Tel: +264 61 208 7158</p>
	<p>For any project wastewater planned for discharge into the environment, a discharge permit should be applied for and obtained.</p>	<p>MAWLR, DWA' Water Environment Division</p> <p>Contact: Ms. Elise Mbandeka Tel: +264 61 208 7167</p>
Nature Conservation Ordinance 4 of 1975	<p>The conservation of nature in general and protection of endangered species</p>	<p>Adhere to the operational rules and regulation of the conservancy areas and ensure that consent is obtained from MEFT to carry out exploration.</p>

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
		MEFT's Directorate of Wildlife & National Parks
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area"	The Proponent should obtain the necessary authorisation from the MME for the storage of fuel on-site (Consumer Installation Permit). Mr. Carlo Mcleod (Ministry of Mines and Energy: Acting Director – Petroleum Affairs) Tel: +264 61 284 8291
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	For any archaeological material, such as bones, unknown graves, old weapons/equipment etc. that may be found on the EPL, work should stop immediately, and the National Heritage Council (NHC) of Namibia must be informed as soon as possible. The Heritage Council will then decide to clear the area or decide to conserve the site or material. Contact Details at the NHC of Namibia: Mrs. Erica Ndalikokule – NHC Director Ms. Agnes Shiningayamwe (Heritage Officer)

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
		Tel: +264 61 301 903

6 ENVIRONMENTAL MONITORING PLAN

This chapter outlines the structured approach to monitoring environmental performance across all project stages, as stipulated by the EMP.

6.1 Monitoring Categories

6.1.1 Project Readiness Monitoring

Tracks preparations required to launch project activities. Gaps are identified and addressed through corrective actions to ensure readiness.

6.1.2 Operational Monitoring

Overseen by government agencies or a designated private-sector operator, this monitors implementation of sub-project operations in compliance with regulatory requirements.

6.1.3 Compliance Monitoring

- The company's Environmental Control Officer (ECO) conducts monthly site inspections during exploration to verify adherence to the EMP and identify deviations.
- After each inspection, the ECO prepares a compliance report for submission to the Exploration Manager, with biannual summaries provided to MEFT or as requested.

6.1.4 Environmental Quality Monitoring

- Independent environmental consultants are appointed by the Proponent to monitor environmental quality parameters (air, noise, and water) at predefined locations.
- This monitoring confirms compliance with national standards and EMP requirements.
- Consultants must be qualified professionals, and will conduct field measurements, document results, highlight non-compliance issues, and recommend mitigation or corrective measures.
- Regular monitoring reports are submitted to regulatory authorities to ensure transparency and sustained oversight throughout the project.

6.2 Objectives of the Monitoring Plan

In alignment with national a best practice guideline, the monitoring Plan aims to:

- Measure the effectiveness of mitigation measures.
- Confirm compliance with environmental legislation and permit conditions.
- Detect unanticipated environmental effects early.
- Enable adaptive management by identifying corrective triggers.
- Provide data to guide environmental improvements over time

6.3 Governance and Reporting Structure

- **ECO-inspection reports** will include photographic evidence, non-compliance findings, and corrective action plans.
- **External consultants' assessments** will include sample-based environmental data, trend analysis, and recommendations.
- **The Exploration Manager** consolidates all monitoring data and ensures follow-up on identified issues.
- Summary reports are submitted periodically to MEFT and made available to stakeholders and affected communities.

7 CONCLUSION

This Environmental Management Plan (EMP) establishes a proactive and structured framework designed to effectively mitigate potential environmental impacts associated with exploration within EPL 8832. Drawing on the Environmental Management Act No. 7 of 2007 and its EIA Regulations (2021), the plan aligns with Namibia's statutory clearance conditions and ensures regulatory compliance

The EMP integrates best practices, innovative mitigation measures, and environmental safeguards to minimize adverse outcomes while maximizing ecological and social benefits. It emphasizes protection of biodiversity, water resources, and cultural heritage, and prioritizes the well-being of local communities. This approach aligns with international sustainability standards and environmental stewardship objectives

By adhering to the EMP protocols, the Proponent commits to:

- **Reducing negative environmental impacts** through effective implementation and corrective action mechanisms.
- **Enhancing ecosystem services and socio-economic value** across the EPL and its surroundings by encouraging biodiversity conservation, cultural preservation, and sustainable local development.
- **Strengthening environmental performance** using ongoing monitoring, stakeholder engagement, and adaptive management strategies.

This EMP reflects the Proponent's dedication to responsible resource development and ecological integrity. Through rigorous implementation and alignment with a robust EIA process, the project seeks to achieve a sustainable balance between exploration objectives and environmental conservation, fostering a harmonious coexistence between human activity and nature.

APPENDIX I: CHANCE FINDS PROCEDURE

Development areas receive heritage surveys based on visible surface evidence. However, buried or historically significant heritage may still be uncovered during exploration. The following protocol outlines the process for reporting and managing such discoveries:

Scope

This procedure applies from the moment a heritage site or object is identified to its assessment and documentation by a professional archaeologist or other suitably qualified specialist. It supports the standard practice adopted across environmental and heritage assessments, including EPL projects in Namibia

Legal Compliance

Under **Section 55(4)** of the **National Heritage Act 27 of 2004**, anyone who discovers archaeological or heritage materials must promptly notify the National Heritage Council (NHC). This protocol ensures that all finds are accurately documented and reported in line with legal obligations

Roles & Responsibilities

Role	Primary Duty
Operator	<ul style="list-style-type: none">• Halt work and exercise caution when possible, heritage remains are found.• Stop machinery and operations immediately.• Mark the find with flag tape.• Document GPS coordinates if feasible.• Notify the foreman promptly
Foreman	<ul style="list-style-type: none">• Secure the site immediately and inform management• Report site details and actions taken to the superintendent.

	<ul style="list-style-type: none"> • Cease all work within the immediate vicinity.
Superintendent	<ul style="list-style-type: none"> • Define safe working boundaries; request archaeological inspection • Inspect and assess whether operations can safely continue. • Establish and mark an exclusion zone around the find. • Add site details (including coordinates) to the project GIS for review by the archaeologist.
Archaeologist	<ul style="list-style-type: none"> • Inspect, identify, advise management, and manage recovery or preservation of heritage materials. • Visually inspect and confirm the site in the project GIS. • Notify the NHC and obtain written permission for removal if necessary. • Handle recovery, packaging, cataloguing, and handover to appropriate heritage authorities or institutions.

Human Remains:

- Follow the standard protocol above.
- Conduct specialized inspection to confirm remains are human.
- Notify the NHC and local police immediately.
- Recover remains and transfer to the National Museum or Forensic Laboratory as directed