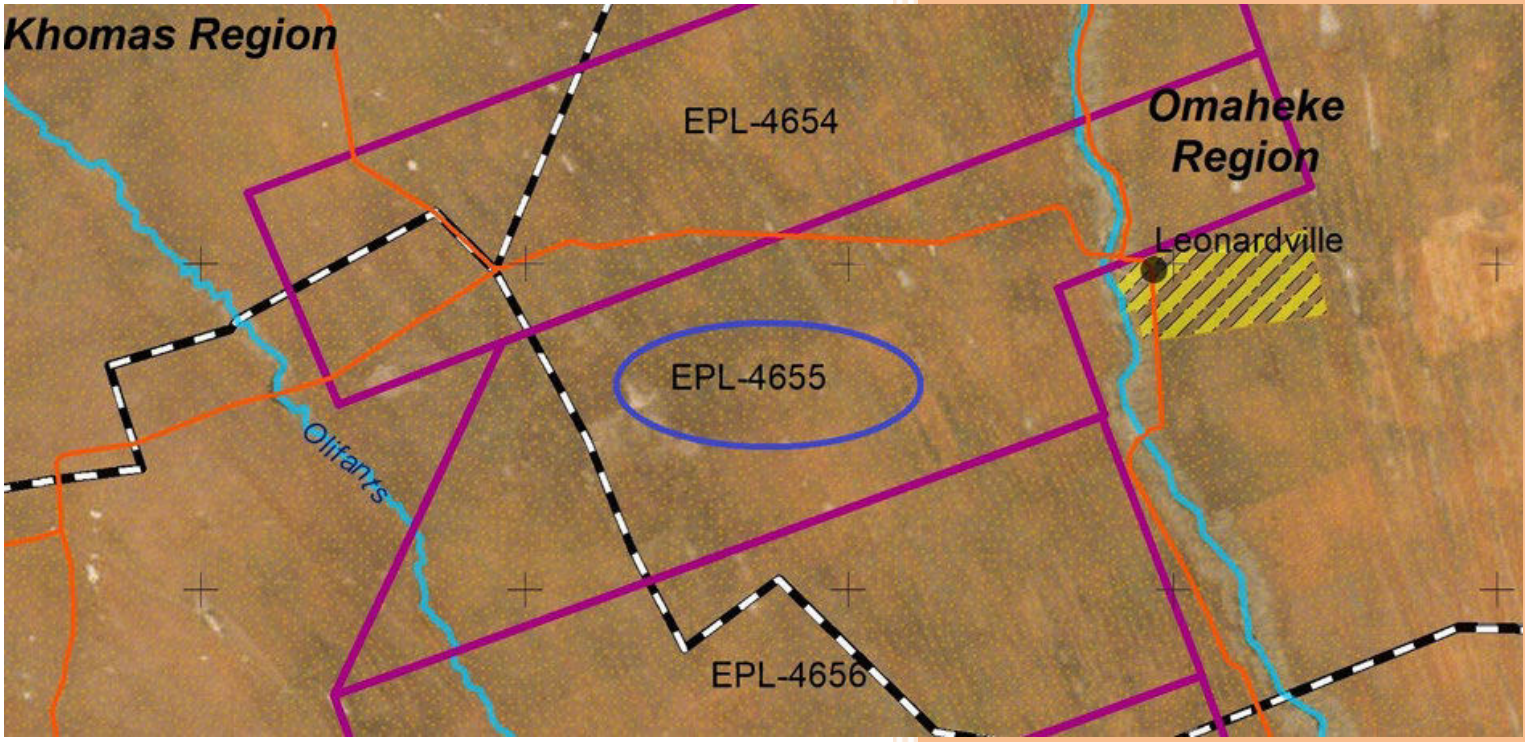
APP005826

2025

Updated Environmental Management Plan

Renewal of the Environmental Clearance Certificate for the Exploration Activities on Exclusive Prospecting Licence (EPL) No. 4655, in the Mariental/Gobabis Districts, Hardap/Omaheke Regions



HEADSPRING INVESTMENTS ROSATOM

ECT

Environmental Management Plan

RENEWAL OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) NO. 4655, IN THE MARIENTAL/GOBABIS DISTRICTS, HARDAP/OMAHEKE REGIONS

PROJECT DETAILS

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ABBREVIATIONS

AIDS	Acquired Immuno-Deficiency Syndrome
EA	Environmental Assessment
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GG	Government Gazette
GIS	Geographic Information System
GN	Government Notice
GPS	Global Positioning System
HIV	Human Immuno-deficiency Virus
I&APs	Interested and Affected Parties
NHC	National Heritage Council
PR	Proponent's Representative
Reg.	Regulation
S	Section
TB	Tuberculosis

1 INTRODUCTION

Headspring Investments (Pty) Ltd (HSI) being the Proponent is proposing to renew the ECC for EPL 4655 which is situated in the Mariental and Gobabis Districts, in the Hardap and Omaheke regions (Eastern Namibia). Mineral rights for EPL No. 4655 are under Headspring Investments (Pty) Ltd. EPL 4655 covers a total area of 75079.7959 Ha and the Proponent is exploring for nuclear fuels. The Ministry of Mines and Energy granted the EPL on 13 May 2022 until 12 May 2024, the EPL has been renewed by the Ministry of Mines and Energy on 17 February 2025 until 16 February 2027.

In 2018, the proponent had appointed Risk Based Solution CC to undertake the Environmental Impact Assessment (EIA) in order to obtain an Environmental Clearance Certificate (ECC) for the exploration activities on the EPL, from the Office of the Environmental Commissioner in the Ministry of Environment, Forestry and Tourism (MEFT). The ECC was issued in 2019.

Environmental Compliance Consultancy CC were subsequently appointed by HSI to apply for the renewal of the above ECC upon expiry in 2022. This ECC is now up for renewal (2025) and the proponent has appointed Environam Consultants Trading (ECT) to apply for the renewal of the ECC.

ECT hereby acknowledges the work previously carried out by Risk Based Solution and Environmental Compliance Consultancy.

This Environmental Management Plan (EMP) has been developed to manage possible impacts associated with the exploration phase. The EMP has been developed in terms of the Environmental Management Act No 7 of 2007, EMA regulations of 2012 and other relevant legislations binding to Namibia. According to the Environmental Management Act of 2007 and its regulations of 2012, mineral exploration is an activity which cannot be undertaken without an ECC.

The EMP is a legally binding document in terms of the provisions of the Environmental Management Act of 2007. The Proponent and its contractors must therefore adhere to the contents of this document.

An EMP is one of the most important outputs of the EIA process as it synthesises all of the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of this development:

- Planning and Design – the period, prior to construction, during which preliminary legislative and administrative arrangements, necessary for the preparation of the land, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- Construction – the period during which the proponent, having dealt with the

necessary legislative and administrative arrangements, appoints a contractor for the construction of services infrastructure, buildings as well as any other construction process(s) within the development areas;

- Operation and Maintenance – the period during which the development will be fully functional, operational and maintained.
- Decommissioning – the period at which activities on site have reached the end of economic viability and closure is imminent.

The EMP aims to take a pro-active route by addressing potential problems before they occur. The objectives of the EMP are therefore;

- To outline mitigation measures in order to manage environmental and socio-economic impacts associated with the exploration phase
- Provide a framework for implementing the management actions recommended in the EIA for exploration activities.
- To ensure that the project will comply with relevant environmental legislations of Namibia and other requirements throughout its activities.

2 PROJECT LOCATION

Exclusive Prospecting License (EPL) 4655 is co-located in the Hardap and Omaheke regions. The license area spans a mix of privately owned commercial farmland and communal land in the Mariental and Gobabis Districts of Namibia. For precise geographic details, refer to Figure 1 (Location Map) and Table 1 (coordinates of EPL 4655).

Table 1: Shows coordinates for EPL 4655

EPL	Area (Hectares)		Coordinates				
		Middle	Corner 2	Corner 3	Corner 4	Corner 5	Corner 6
4655	75079.7959	23.569234°S 18.574085°E	23.542425 18.437403	23.385944°S 18.846944°E	23.458375°S 18.873914°E	23.513356 18.737197	23.581442°S 18.762689°E

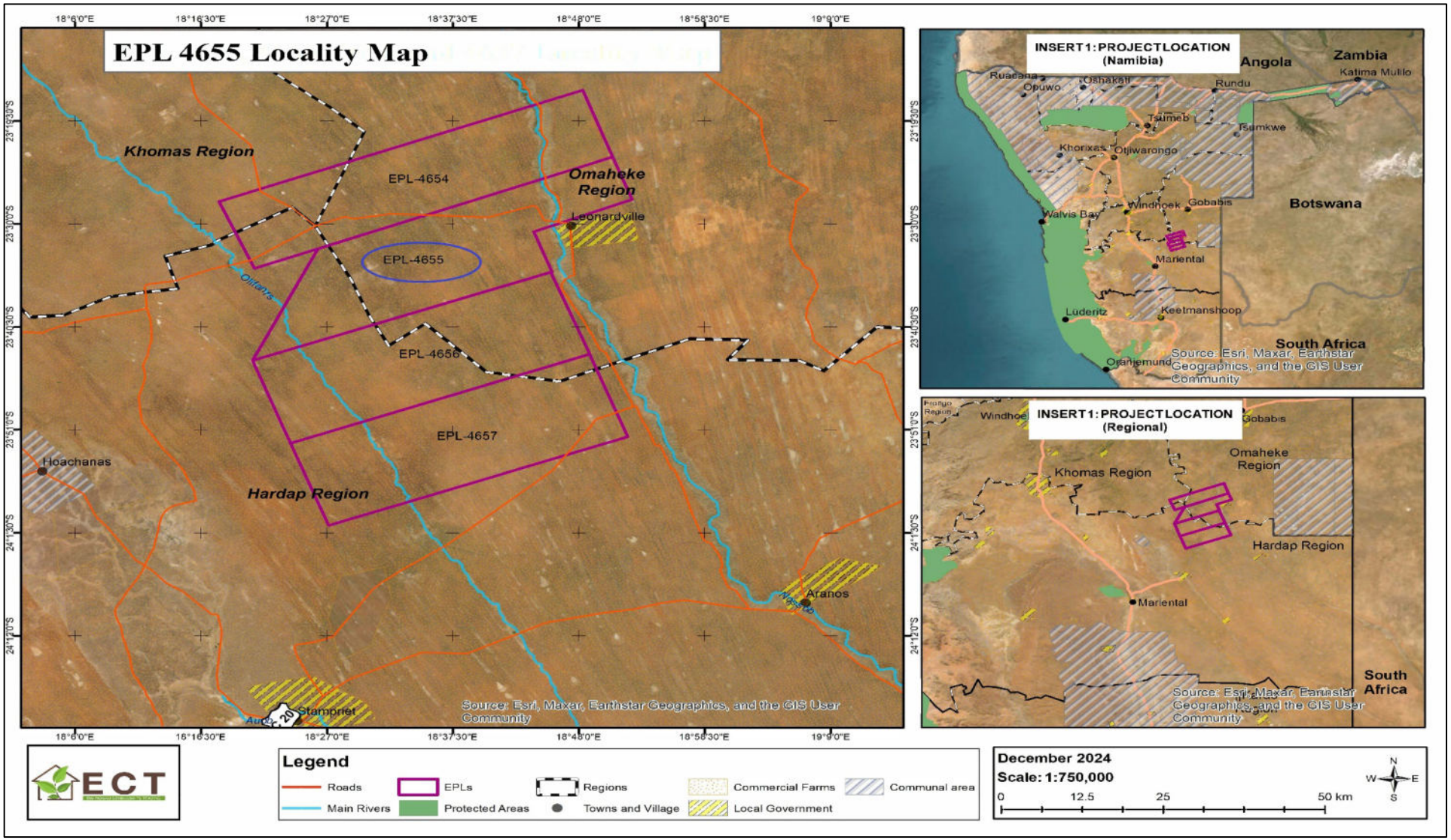

Figure 1: Locality Map of EPL4655

3 OPERATIONAL ACTIVITIES

Table 2 outlines exploration activities conducted between 2019 and 2021. During this period, the Proponent employed **exploration drilling**, a technique used to identify new mineral prospects. This process involved drilling beneath the surface to extract cylindrical **core samples** at specified depths. Core samples, obtained via **core drilling**, provide critical insights into subsurface geology and help assess the presence and quality of mineral resources. After extraction, these samples were transported to the surface for analysis.

To ensure environmental responsibility, the Proponent **rehabilitated each drilling site** prior to moving to the next location. This involved sealing exploration wells with concrete from top to bottom (see **Appendix B: Sealed Exploration Wells**). Post-drilling, core samples were stored in a dedicated facility (referenced in **Appendix B: Storage Facility**) before being sent for **geochemical sampling and analysis** to evaluate mineral composition. These samples will in future be analysed at the Field Mobile Physical and Chemical Laboratory on Farm Tripoli 546.

Concurrently, the Proponent conducted **hydrogeological investigations** by drilling groundwater monitoring wells. Water samples were collected from these wells and tested to establish baseline groundwater conditions, including the presence of **radionuclides** or contaminants. These benchmarks will inform future groundwater assessments throughout the project lifecycle.

Additionally, **geophysical well logging** was performed during the exploration phase. This method involved lowering specialized probes into boreholes to collect continuous or discrete measurements of subsurface properties. Data transmitted electronically to the surface (via analog or digital signals) provide insights into:

- Physical and chemical characteristics of surrounding rock formations,
- Fluid properties within pore spaces and the borehole,
- Well construction integrity.

These measurements are critical for interpreting subsurface conditions and guiding subsequent project phases.

No exploration activities were conducted since 2021 to date on this EPL. Subsequently, no further exploration and drilling activities could be conducted due to the withdrawal of the drilling permits in November 2021 (see Appendix C). When the ECC is renewed,

pending drilling permits from the Ministry of Agriculture, Fisheries, Water and Land Reform, the Proponent plans to carry exploration activities which include; exploration drilling, hydrogeological drilling, core sampling, geophysical well logging and testing of hydrogeological wells for radionuclides.

Table 2: Operational activities

2019	2020	2021	2022 to 2025
▪ Exploration drilling ▪ Geophysical well logging ▪ Core sampling	▪ Exploration drilling ▪ Geophysical well logging ▪ Core sampling ▪ Hydrogeological drilling ▪ Water Analysis	▪ Exploration drilling ▪ Geophysical well logging ▪ Core sampling ▪ Hydrogeological drilling ▪ Water Analysis	▪ No exploration and drilling activities conducted, due to the withdrawal of the drilling permits in November 2021 (see Appendix C)

Table 3: Exploration boreholes drilled in 2019

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	1-14	148.50	265746.4480	7402578.5920	1275.3480	2019
EPL 4655	1-15	129.70	265022.2800	7403126.6310	1276.5920	2019
EPL 4655	1-16	132.20	265374.6360	7402862.5460	1275.3850	2019
EPL 4655	1-17	126.00	265209.3080	7402977.0300	1276.0050	2019
EPL 4655	1-18	136.40	265134.0080	7403044.8780	1276.2740	2019
EPL 4655	1-19	130.60	264974.7810	7403171.4200	1276.6670	2019
EPL 4655	1-20	130.50	265291.6910	7402918.7370	1275.4840	2019
EPL 4655	3-13	156.00	254159.8970	7397457.7960	1283.3790	2019
EPL 4655	3-14	142.50	253217.8280	7398149.9690	1294.7740	2019
EPL 4655	3-15	142.00	253131.6100	7398212.6490	1292.6320	2019
EPL 4655	3-16	142.20	253300.1120	7398093.8590	1297.7590	2019
EPL 4655	3-17	142.18	253174.9360	7398185.7440	1293.8520	2019
EPL 4655	3-18	141.40	253383.1630	7398037.6820	1296.0270	2019
EPL 4655	3-19	141.00	253461.7250	7397978.9420	1293.7810	2019
EPL 4655	3-20	138.40	253544.2880	7397917.8590	1290.1540	2019
EPL 4655	94-01	151.60	252030.2640	7397328.0030	1283.6580	2019
EPL 4655	94-02	151.60	252187.8740	7397210.5510	1284.4620	2019
EPL 4655	94-03	150.20	252348.7570	7397087.9750	1283.4260	2019
EPL 4655	94-04	150.80	252506.7770	7396962.9650	1283.1900	2019
EPL 4655	94-05	140.70	252820.7220	7396720.6460	1284.5770	2019
EPL 4655	116-03	150.60	255274.5210	7399892.1710	1298.6050	2019
EPL 4655	116-04	150.60	255340.2250	7399826.3240	1297.0230	2019
EPL 4655	116-05	151.00	256037.0920	7399270.2440	1286.3210	2019
EPL 4655	116-06	152.60	255412.2310	7399766.5620	1294.8190	2019

EPL 4655	116-07	79.00	255569.2350	7399646.3040	1289.3970	2019
EPL 4655	116-07/1	150.60	255532.5830	7399668.9950	1290.3950	2019
EPL 4655	116-08	150.00	255622.2910	7399624.6230	1288.3270	2019
EPL 4655	116-09	150.50	255687.8860	7399549.1400	1288.1440	2019
EPL 4655	116-10	150.00	255770.6010	7399484.4270	1287.5470	2019
EPL 4655	134-01	150.30	259459.5110	7400621.2720	1280.1470	2019
EPL 4655	134-02	150.25	259540.4760	7400564.6780	1279.8860	2019
EPL 4655	134-05	150.30	259390.4520	7400684.9320	1279.7460	2019
EPL 4655	134-06	150.30	259303.2920	7400745.5830	1279.9870	2019
EPL 4655	134-07	151.00	259222.0840	7400802.8250	1279.9350	2019
EPL 4655	149-01	150.60	262226.7710	7401778.7250	1285.4980	2019
EPL 4655	149-02	150.50	262306.4280	7401719.5160	1285.4330	2019
EPL 4655	149-03	150.70	262385.4020	7401653.3610	1283.2090	2019
EPL 4655	149-04	149.90	262454.4460	7401599.2010	1282.7510	2019
EPL 4655	149-05	150.60	262143.0250	7401838.0140	1284.5920	2019
EPL 4655	149-08	150.60	262542.5720	7401539.7240	1282.4870	2019
EPL 4655	149-09	150.60	262705.1810	7401423.7640	1282.3910	2019
EPL 4655	149-10	150.80	262860.5180	7401294.2600	1281.3140	2019
EPL 4655	157-01	150.60	263939.9580	7402215.7480	1276.9750	2019
EPL 4655	157-02	150.90	263777.0560	7402336.0660	1278.1290	2019
EPL 4655	157-03	151.00	263699.8950	7402399.4320	1278.7530	2019
EPL 4655	157-08	150.40	264097.8670	7402093.6610	1275.3840	2019
EPL 4655	157-09	150.80	264177.7730	7402031.9760	1275.3120	2019

Table 4: Exploration and Hydrogeological/Monitoring boreholes drilled in 2020

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	1-21	131.45	265412.8660	7402832.8660	1275.7710	2020
EPL 4655	1-AB1	181.60	260438.6480	7401136.5220	1284.8900	2020
EPL 4655	1-AB2G	157.70	260429.5550	7401107.0170	1284.7210	2020
EPL 4655	1-AB3G	133.00	260434.0360	7401120.0780	1284.6700	2020
EPL 4655	1-NS	303.10	260447.8250	7401116.3590	1284.4820	2020
EPL 4655	3-21	138.30	253253.6100	7398123.5040	1296.3070	2020
EPL 4655	3-AB3	135.50	260422.3470	7401123.9960	1284.7480	2020
EPL 4655	5-AB3G	141.00	260383.2210	7401132.1070	1284.7580	2020
EPL 4655	90-02	138.30	252553.9110	7395822.1190	1280.1140	2020
EPL 4655	90-04	138.30	252385.3730	7396046.9600	1280.5550	2020
EPL 4655	90-05	138.50	252312.1130	7396101.6560	1281.1660	2020
EPL 4655	90-06	138.10	252236.9330	7396161.6690	1281.1300	2020
EPL 4655	90-07	138.30	252155.7880	7396220.5150	1281.3880	2020
EPL 4655	94-06	131.50	252655.5030	7396835.3510	1283.9630	2020
EPL 4655	94-07	136.90	252744.6840	7396782.9890	1284.0860	2020
EPL 4655	94-08	136.48	252980.2670	7396595.2030	1283.7880	2020
EPL 4655	94-09	137.40	253060.1130	7396541.1840	1282.7670	2020

EPL 4655	94-10	137.50	253137.3800	7396472.9520	1281.9010	2020
EPL 4655	94-11	137.90	253219.9380	7396410.8740	1281.6350	2020
EPL 4655	94-12	137.50	253299.3010	7396357.5130	1281.6260	2020
EPL 4655	98-12	135.30	253629.3980	7396978.7680	1285.6620	2020
EPL 4655	98-13	136.40	253708.9590	7396917.2750	1286.1180	2020
EPL 4655	98-14	136.90	253782.5580	7396860.8580	1286.5670	2020
EPL 4655	98-15	135.70	253872.4400	7396800.5120	1287.1580	2020
EPL 4655	98-16	135.70	253945.8530	7396734.7010	1287.2580	2020
EPL 4655	99-01	138.50	253456.8120	7397412.4710	1287.7520	2020
EPL 4655	100-01	136.43	253518.6390	7397488.3690	1291.3500	2020
EPL 4655	105-03	132.30	253890.4200	7398555.7190	1287.1760	2020
EPL 4655	105-05	131.40	254052.4490	7398434.7470	1288.1620	2020
EPL 4655	105-06	132.00	254132.4680	7398376.7540	1289.0900	2020
EPL 4655	105-07	131.70	254212.0520	7398315.0940	1289.4900	2020
EPL 4655	109-03	132.65	254505.0910	7398958.2080	1282.4930	2020
EPL 4655	109-04	132.75	254585.8060	7398902.0470	1283.3370	2020

EPL 4655	109-05	128.39	254664.7850	7398842.3380	1283.9240	2020
EPL 4655	109-06	132.70	254745.7710	7398783.0280	1284.4750	2020
EPL 4655	112-02bis	131.40	254902.1460	7399315.0660	1284.6270	2020
EPL 4655	112-03	130.62	254977.3710	7399249.6920	1284.6720	2020
EPL 4655	112-04	127.30	255057.5550	7399190.2150	1284.8120	2020
EPL 4655	112-05	131.80	255136.0420	7399133.0760	1284.7450	2020
EPL 4655	112-AB3	124.00	255102.1710	7399159.1090	1284.7890	2020
EPL 4655	112-Ab3G	200.00	255057.0000	7400292.0000	1200.0000	2020
EPL 4655	116-11bis	130.48	255675.1130	7399581.0790	1287.9270	2020
EPL 4655	116-12	134.54	255730.6320	7399516.2030	1287.7880	2020
EPL 4655	118-03	121.72	256253.5040	7399591.2050	1286.9120	2020
EPL 4655	118-06	131.92	256012.7050	7399771.5010	1294.6820	2020
EPL 4655	118-07	137.42	255933.1610	7399832.7420	1296.1720	2020
EPL 4655	118-08	131.52	255854.4570	7399892.8970	1293.8730	2020
EPL 4655	118-09	130.60	255776.7070	7399951.5020	1291.5920	2020
EPL 4655	118-10	134.04	255698.3110	7400016.0830	1290.0730	2020
EPL 4655	118-11	131.48	255614.1310	7400069.3180	1288.5060	2020
EPL 4655	118-12	137.50	255535.1540	7400133.6200	1288.2470	2020
EPL 4655	120-01	131.55	256554.9860	7399777.9470	1285.1480	2020
EPL 4655	120-02	131.44	256657.7700	7399715.8310	1284.6280	2020
EPL 4655	120-03	130.74	256736.7260	7399656.8160	1284.3970	2020
EPL 4655	120-05	130.96	256417.7630	7399893.7650	1287.1230	2020
EPL 4655	120-07	128.56	256259.3340	7400017.5500	1290.1460	2020
EPL 4655	120-09	130.58	256103.0790	7400139.9700	1290.4760	2020
EPL 4655	120-10	130.55	256026.1940	7400198.6430	1289.9260	2020
EPL 4655	120-11	130.47	255944.9120	7400261.4120	1290.2220	2020
EPL 4655	120-12bis	131.08	255862.4790	7400323.7710	1291.1960	2020
EPL 4655	120-13	130.47	255779.7350	7400383.3680	1292.2970	2020
EPL 4655	120-AB3	200.00	255908.5680	7400289.6870	1291.1630	2020
EPL 4655	122-12	133.20	256188.1710	7400510.4360	1286.7490	2020
EPL 4655	122-15	135.80	255950.4380	7400692.6720	1290.8770	2020
EPL 4655	122-16	132.80	255869.9800	7400751.1610	1292.8460	2020
EPL 4655	122-17	131.45	255790.9510	7400813.2750	1292.6260	2020
EPL 4655	122-20	132.50	255553.9400	7400994.1290	1290.6800	2020
EPL 4655	124-001	130.88	257337.4200	7400067.2700	1282.4910	2020
EPL 4655	124-01	133.62	257491.6390	7399946.6210	1283.4360	2020
EPL 4655	124-03	130.92	257653.3290	7399825.9790	1282.9010	2020
EPL 4655	124-05	132.96	257810.1420	7399708.2820	1280.7800	2020
EPL 4655	124-009	129.83	256697.7020	7400554.2500	1287.0460	2020
EPL 4655	124-014	134.20	256312.6250	7400845.0990	1284.1230	2020
EPL 4655	124-019	131.90	255916.6640	7401148.0240	1286.6050	2020
EPL 4655	124-020	135.60	255838.1710	7401209.5540	1287.1920	2020
EPL 4655	124-022	133.10	255680.0940	7401333.1830	1288.5770	2020
EPL 4655	124-023	125.20	255599.2680	7401393.0330	1290.9060	2020
EPL 4655	124-024	134.20	255520.3280	7401452.1930	1292.5400	2020

EPL 4655	126-01	131.59	258068.6670	7399944.7590	1278.5960	2020
EPL 4655	126-04	141.75	258305.8800	7399761.6300	1280.1570	2020
EPL 4655	126-06	131.60	257750.8020	7400186.9330	1280.4040	2020
EPL 4655	126-08	132.30	257590.2860	7400306.6070	1281.9760	2020
EPL 4655	126-16	134.70	256952.1720	7400791.8340	1291.7280	2020
EPL 4655	126-19	131.90	256713.5910	7400973.3310	1288.8030	2020
EPL 4655	126-22	138.30	256479.0380	7401154.4280	1285.9190	2020
EPL 4655	126-26	135.40	256160.3700	7401400.1640	1283.0080	2020
EPL 4655	126-Ab3G	200.00	258265.5390	7399793.1810	1279.8630	2020
EPL 4655	127-01	131.80	257651.8710	7400384.7020	1281.2970	2020
EPL 4655	127-02	131.50	257715.7460	7400464.6100	1280.1130	2020
EPL 4655	127-03	131.50	257776.1310	7400541.4560	1279.9730	2020
EPL 4655	128-01	131.50	257840.7620	7400621.0900	1279.8690	2020
EPL 4655	128-02	140.58	258485.8370	7400053.9930	1280.6410	2020
EPL 4655	128-03	132.47	258566.1100	7399998.4900	1281.2490	2020
EPL 4655	128-05	142.50	258727.3850	7399880.3400	1282.8470	2020
EPL 4655	128-06	138.20	258807.9840	7399818.6080	1283.1660	2020
EPL 4655	128-07	131.60	258862.4950	7399743.0020	1283.8180	2020
EPL 4655	129-04	134.60	259021.5190	7399979.3850	1280.5990	2020
EPL 4655	129-05	137.10	259102.1240	7399928.0030	1280.0070	2020
EPL 4655	129-06	131.60	259185.1220	7399866.5920	1279.6280	2020
EPL 4655	129-07	130.51	259263.6500	7399809.2480	1278.8100	2020
EPL 4655	129-08	131.56	259344.8820	7399748.5170	1278.1710	2020
EPL 4655	131-1C-AB3	130.60	259240.4730	7400143.5570	1277.7750	2020
EPL 4655	131-1M-AB3	139.80	259263.0180	7400128.4100	1277.8060	2020
EPL 4655	131-02	140.87	259071.8960	7400267.6840	1277.2800	2020
EPL 4655	131-03	131.84	259151.1780	7400207.6320	1277.6540	2020
EPL 4655	131-3M-AB3	150.00	259290.8080	7400103.6920	1277.7870	2020
EPL 4655	131-04	131.50	259229.3670	7400152.3390	1277.7230	2020
EPL 4655	131-05	132.82	259307.3390	7400090.9830	1277.6800	2020
EPL 4655	131-5M-AB3	150.00	259351.3700	7400056.2820	1278.2550	2020
EPL 4655	131-06	132.74	259388.5970	7400030.5330	1278.8660	2020
EPL 4655	131-07	132.40	259467.6980	7399965.6170	1279.5660	2020
EPL 4655	131-08	132.40	259547.3490	7399907.6550	1279.6540	2020
EPL 4655	131-09	132.20	259628.6970	7399849.5460	1279.6860	2020
EPL 4655	131-AB2	142.70	259249.1530	7400111.8700	1278.0180	2020
EPL 4655	132-01	131.45	259307.8100	7400410.8670	1281.4750	2020
EPL 4655	132-02	131.58	259391.3660	7400348.9170	1281.5000	2020
EPL 4655	132-03	131.58	259465.8890	7400287.1630	1281.9190	2020
EPL 4655	132-04	131.64	259572.2710	7400235.6870	1280.3720	2020
EPL 4655	132-05	131.46	259626.0960	7400169.6220	1279.9140	2020

EPL 4655	132-06	132.12	259698.3590	7400103.1690	1279.3630	2020
EPL 4655	132-06bis	131.50	259704.6590	7400104.8260	1279.3020	2020
EPL 4655	134-03	131.60	259631.5230	7400461.3850	1279.6740	2020
EPL 4655	134-04	131.88	259712.6200	7400430.9150	1279.7440	2020
EPL 4655	134-08	132.83	259796.5170	7400371.1020	1279.2020	2020
EPL 4655	134-09	131.60	259874.2400	7400315.1880	1278.1230	2020
EPL 4655	136-00	130.72	259768.8340	7400824.2230	1278.9350	2020
EPL 4655	136-01	130.45	259873.2490	7400740.5250	1279.1450	2020
EPL 4655	136-02	130.47	259951.5800	7400682.5250	1279.2870	2020
EPL 4655	136-03	132.58	260031.8190	7400622.4680	1279.8150	2020
EPL 4655	136-04	131.73	260118.0990	7400539.2180	1280.2680	2020
EPL 4655	138-00	130.54	260121.7570	7400985.3630	1285.3690	2020
EPL 4655	138-01	131.45	260204.0450	7400925.6090	1284.7980	2020
EPL 4655	138-02	130.56	260277.5000	7400867.2850	1283.7660	2020
EPL 4655	138-03	130.49	260361.1900	7400803.5380	1282.5980	2020
EPL 4655	138-04	130.50	260439.4640	7400745.9890	1282.4800	2020
EPL 4655	138-05	131.46	260035.1960	7401035.7920	1284.7500	2020
EPL 4655	138-06	132.45	259955.3490	7401097.8040	1283.6160	2020
EPL 4655	138-07	130.65	259837.2870	7401184.9990	1282.3690	2020
EPL 4655	138-08	130.39	259745.8190	7401235.3900	1281.7300	2020
EPL 4655	138-09	131.67	259890.7590	7401147.3800	1283.0100	2020
EPL 4655	140-00	132.41	260462.4180	7401148.2350	1285.0460	2020
EPL 4655	140-0/1	131.59	260375.6460	7401199.4250	1284.3920	2020
EPL 4655	140-0/2	130.97	260286.8480	7401238.5070	1284.4170	2020
EPL 4655	140-0/3	131.65	260203.4740	7401292.6300	1284.6880	2020
EPL 4655	140-0/4	131.54	260112.1320	7401345.3050	1284.4280	2020
EPL 4655	140-0/5	131.59	260058.8910	7401423.2440	1284.4060	2020
EPL 4655	140-01	134.59	260548.8680	7401101.2710	1286.3080	2020
EPL 4655	140-02	138.61	260630.5170	7401041.8040	1287.0620	2020
EPL 4655	140-03	152.56	260708.3780	7400984.0550	1286.5400	2020
EPL 4655	140-04	131.54	260789.9620	7400921.8560	1284.0750	2020
EPL 4655	140-05	131.57	260870.7530	7400860.5420	1282.6190	2020
EPL 4655	142-00	131.50	260813.7260	7401328.2640	1283.5430	2020
EPL 4655	142-01	133.00	260899.2560	7401271.0160	1284.0930	2020
EPL 4655	142-02	140.50	260975.4750	7401210.9800	1284.6360	2020
EPL 4655	142-03bis	131.67	261061.8880	7401144.3350	1285.2300	2020
EPL 4655	142-04	129.55	261137.1240	7401086.4740	1284.9120	2020
EPL 4655	142-05	128.54	261215.3980	7401030.2220	1283.7500	2020
EPL 4655	142-06	131.46	261292.4310	7400967.6410	1283.0200	2020
EPL 4655	142-08	131.54	260738.0580	7401390.8500	1283.2880	2020
EPL 4655	142-09	131.47	260661.2340	7401454.8140	1283.0650	2020
EPL 4655	142-10	131.48	260586.7610	7401520.5320	1283.7890	2020
EPL 4655	144-03	130.58	261442.0760	7401290.2660	1280.8280	2020
EPL 4655	144-04	132.60	261510.5120	7401240.7640	1280.7000	2020
EPL 4655	144-05	131.25	261599.2950	7401172.6630	1280.1390	2020

EPL 4655	144-06	131.48	261682.3220	7401116.6630	1279.7260	2020
EPL 4655	144-07	130.60	261761.1860	7401057.9680	1280.0400	2020
EPL 4655	144-08	130.86	261842.8280	7400997.9260	1280.1260	2020
EPL 4655	144-09	130.56	261921.5370	7400938.0290	1280.5220	2020
EPL 4655	144-AB3	136.50	261797.4350	7401029.2090	1279.7630	2020
EPL 4655	146-03	132.47	261829.9740	7401431.1100	1282.4370	2020
EPL 4655	146-04	130.48	261905.3860	7401372.7670	1281.9990	2020
EPL 4655	146-05	130.43	261984.6320	7401312.1770	1281.7770	2020
EPL 4655	146-07	129.55	262149.7180	7401194.4840	1281.2170	2020
EPL 4655	146-08	129.77	262226.5680	7401134.6240	1281.2390	2020
EPL 4655	146-09	124.45	262305.2150	7401070.0540	1282.1880	2020
EPL 4655	149-06	130.59	262778.2090	7401356.4750	1282.1330	2020
EPL 4655	149-07	130.60	262626.3230	7401475.6570	1282.8050	2020
EPL 4655	151-03	132.80	262976.2440	7401641.0390	1285.3760	2020
EPL 4655	151-04	132.01	263055.8580	7401582.8820	1284.3950	2020
EPL 4655	151-05	131.48	263139.0700	7401525.2690	1282.3560	2020
EPL 4655	151-06	132.48	263221.2670	7401473.7250	1280.6170	2020
EPL 4655	151-07	131.44	263305.4420	7401418.8410	1281.2550	2020
EPL 4655	151-08	131.56	263385.6890	7401366.6280	1280.5800	2020
EPL 4655	153-01	131.60	263173.2270	7401935.0230	1280.9590	2020
EPL 4655	153-02	131.71	263257.2480	7401871.1050	1281.1690	2020
EPL 4655	153-03	132.49	263336.8490	7401804.6470	1281.7840	2020
EPL 4655	153-04	133.20	263411.6020	7401747.6930	1283.1650	2020
EPL 4655	153-05	134.00	263490.8520	7401687.7480	1284.3610	2020
EPL 4655	153-06	134.36	263571.2740	7401630.3600	1284.9170	2020
EPL 4655	153-07	131.43	263651.3550	7401568.5770	1283.3470	2020
EPL 4655	153-08	132.00	263728.2040	7401504.9310	1281.2360	2020
EPL 4655	153-09	131.47	263811.2090	7401445.2270	1279.3620	2020
EPL 4655	155-02	131.59	263601.4250	7402041.3220	1279.9970	2020
EPL 4655	155-03	131.63	263680.3330	7401984.0020	1279.3960	2020
EPL 4655	155-04	131.55	263755.1880	7401922.7540	1278.6580	2020
EPL 4655	155-05	131.50	263834.8170	7401860.8880	1279.7560	2020
EPL 4655	155-06	131.55	263916.0700	7401803.1200	1279.0490	2020
EPL 4655	157-04	131.59	263860.5190	7402277.1530	1277.9010	2020
EPL 4655	157-05	131.94	264024.6730	7402162.3650	1275.8950	2020
EPL 4655	159-01	131.86	264152.3830	7402491.9400	1276.0880	2020
EPL 4655	159-03	133.48	263999.1810	7402607.9830	1276.7490	2020
EPL 4655	159-04	131.87	263921.8760	7402673.7350	1276.9670	2020
EPL 4655	161-03	131.50	264509.8800	7402582.4220	1276.8480	2020
EPL 4655	161-05	131.45	264757.7390	7402463.7330	1277.7860	2020
EPL 4655	161-06	131.43	264837.4480	7402404.3760	1277.4400	2020
EPL 4655	161-07	131.70	264917.4590	7402343.1700	1277.3550	2020
EPL 4655	161-08	131.50	264996.7980	7402281.6070	1277.1050	2020
EPL 4655	161-09	131.49	265078.0120	7402221.6870	1276.5130	2020
EPL 4655	161-10	135.90	265154.7160	7402161.8160	1276.4080	2020

EPL 4655	161-11	131.55	265234.4690	7402100.1220	1276.1610	2020
EPL 4655	161-12	131.47	265311.7300	7402043.6910	1275.5890	2020
EPL 4655	163-03	131.57	264889.8930	7402797.2340	1277.1220	2020
EPL 4655	163-04	131.85	264966.4250	7402739.2950	1276.8260	2020
EPL 4655	163-05	131.56	265047.9680	7402676.9410	1276.1700	2020
EPL 4655	163-06	131.57	265127.4130	7402615.1920	1275.9030	2020
EPL 4655	163-07	131.86	265206.0020	7402552.5120	1275.4730	2020
EPL 4655	163-09	131.62	265364.1290	7402430.5240	1274.9050	2020
EPL 4655	163-11	135.29	265523.1310	7402309.7440	1273.8260	2020
EPL 4655	163-12	134.54	265602.3850	7402246.5000	1272.9010	2020
EPL 4655	163-13	131.83	265680.3960	7402185.4700	1271.8070	2020
EPL 4655	163-14	131.54	265758.9040	7402128.5220	1271.9440	2020
EPL 4655	163-15	131.63	265856.6050	7402058.0840	1272.0200	2020
EPL 4655	163-16	131.49	265924.8520	7402000.0260	1272.2660	2020
EPL 4655	163-17	128.57	265999.2490	7401941.5370	1273.0160	2020
EPL 4655	163-AB3	125.60	265008.6160	7402706.0050	1276.4360	2020
EPL 4655	166-03	131.95	265514.8330	7403225.6220	1278.7160	2020
EPL 4655	166-04	131.57	265592.1980	7403173.4690	1279.1540	2020
EPL 4655	166-05	131.73	265679.5320	7403114.1400	1281.5550	2020
EPL 4655	166-06	131.60	265761.1080	7403055.2280	1284.5410	2020
EPL 4655	166-07	132.06	265845.5680	7403001.4240	1287.2890	2020
EPL 4655	166-08	131.50	265927.1620	7402942.5840	1287.8890	2020
EPL 4655	166-09	131.60	266007.2030	7402887.5590	1285.0360	2020
EPL 4655	168-02	132.43	265771.4770	7403508.2880	1285.9610	2020
EPL 4655	168-04	131.78	265932.7430	7403387.6190	1280.9400	2020
EPL 4655	168-05	132.06	266017.0070	7403334.4340	1280.2750	2020
EPL 4655	168-06	132.43	266096.2190	7403269.5610	1279.7720	2020
EPL 4655	168-07	131.96	266176.3830	7403215.4860	1279.1950	2020
EPL 4655	168-08	131.77	266260.8510	7403156.0500	1278.7610	2020
EPL 4655	170-03	131.26	266032.9200	7403800.9390	1282.5100	2020
EPL 4655	170-04	130.70	266117.2370	7403742.6940	1284.0470	2020
EPL 4655	170-06	133.60	266281.1200	7403625.5920	1288.8290	2020
EPL 4655	170-08	131.59	266445.7890	7403513.2990	1294.0260	2020
EPL 4655	170-09	131.60	266556.3950	7403482.0220	1288.2880	2020
EPL 4655	170-10bis	131.60	266612.1020	7403397.6680	1287.3660	2020
EPL 4655	170-11	137.60	266690.0740	7403346.2990	1286.7530	2020
EPL 4655	170-12	137.20	266775.7980	7403287.5820	1286.3780	2020
EPL 4655	172-02	131.78	266129.2850	7404203.1490	1289.7790	2020
EPL 4655	172-03	131.79	266216.4840	7404153.8690	1289.3090	2020
EPL 4655	172-04	131.77	266303.5980	7404104.5640	1287.3460	2020
EPL 4655	172-05	131.80	266391.2250	7404055.1420	1285.5610	2020
EPL 4655	172-06	131.79	266476.9720	7404004.6990	1284.4130	2020
EPL 4655	172-07	131.76	266565.5410	7403957.0470	1283.3210	2020
EPL 4655	172-08	131.79	266650.5820	7403907.7590	1281.1440	2020
EPL 4655	172-09	131.77	266731.0650	7403857.0380	1278.4490	2020

EPL 4655	172-10	131.78	266827.1080	7403800.2230	1278.8140	2020
EPL 4655	172-11	131.78	266911.6560	7403759.4180	1279.4980	2020
EPL 4655	174-04	131.50	266491.1160	7404463.1750	1276.3140	2020
EPL 4655	174-06	131.50	266667.9980	7404373.6600	1277.6310	2020
EPL 4655	174-07	131.78	266756.9850	7404327.1420	1275.0650	2020
EPL 4655	174-10	131.80	267024.0270	7404190.0660	1276.5410	2020
EPL 4655	174-14	131.60	267374.1100	7404007.1850	1273.3600	2020
EPL 4655	174-18	131.45	267728.6590	7403823.1070	1274.1080	2020
EPL 4655	176-06	131.60	266851.0580	7404726.6360	1275.0320	2020
EPL 4655	176-07	131.45	266945.5590	7404682.8870	1275.1570	2020
EPL 4655	P08-01	184.60	252721.3740	7390476.6260	1272.6610	2020
EPL 4655	P08-03	157.60	252094.4620	7390225.7580	1272.9900	2020
EPL 4655	P08-04	181.60	251634.4970	7390035.4340	1272.6380	2020
EPL 4655	98-20	135.70	253386.9750	7397156.4250	1284.3630	2020

Table 5: Exploration and Hydrogeological/Monitoring boreholes drilled in 2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	3-22	135.45	253052.3910	7398273.5960	1291.2850	2021
EPL 4655	3-23	135.67	253616.0710	7397847.2090	1287.7050	2021
EPL 4655	3-24	131.18	253689.9980	7397790.8290	1286.7930	2021
EPL 4655	5-16-2	152.15	277122.9200	7410593.6720	1293.5610	2021
EPL 4655	5-20-1	146.20	277497.3920	7410733.6590	1293.3940	2021
EPL 4655	5-24-2	152.30	277877.9870	7410870.6160	1293.2980	2021
EPL 4655	5-40-1	182.62	279375.6090	7411423.3930	1299.8310	2021
EPL 4655	52-01	165.74	252656.5010	7389308.3400	1271.2830	2021
EPL 4655	52-02	165.75	252749.4320	7389344.2860	1272.9290	2021
EPL 4655	52-03	168.68	252842.9170	7389376.6390	1274.5450	2021
EPL 4655	52-04	160.66	252562.3280	7389270.9550	1270.5410	2021
EPL 4655	52-05	165.60	252937.4110	7389411.3010	1273.4410	2021
EPL 4655	52-06	165.74	253029.5190	7389445.4450	1271.4520	2021
EPL 4655	56-01	166.00	252379.5960	7390056.2230	1275.0360	2021
EPL 4655	56-02	168.55	252471.3940	7390091.9770	1276.5740	2021
EPL 4655	56-03	165.55	252286.8550	7390021.8800	1273.3190	2021
EPL 4655	56-04	165.40	252191.2220	7389987.4700	1272.4610	2021
EPL 4655	59-01	162.70	251607.7610	7390415.3130	1273.0670	2021
EPL 4655	60-01	163.20	251537.5320	7390602.5540	1273.4850	2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	60-02	165.52	251725.4630	7390668.7970	1273.5610	2021
EPL 4655	60-03	164.70	251820.3230	7390705.4020	1273.7160	2021
EPL 4655	60-04	161.40	251914.0630	7390735.9540	1274.7360	2021
EPL 4655	60-05	160.61	252009.3150	7390771.0850	1276.3410	2021
EPL 4655	60-06	160.57	251631.7820	7390636.0220	1273.4460	2021
EPL 4655	62-01	165.48	251400.1510	7390978.9420	1274.3550	2021
EPL 4655	62-02	166.00	251584.9540	7391046.5330	1274.4160	2021
EPL 4655	62-03	160.59	251681.5410	7391078.8190	1274.9650	2021
EPL 4655	62-04	161.30	251493.8440	7391010.6810	1274.6030	2021
EPL 4655	64-1	152.60	251320.2750	7391372.8700	1275.1500	2021
EPL 4655	64-02	159.10	250758.9760	7391171.6900	1274.6020	2021
EPL 4655	64-03	161.14	250887.9240	7391209.6630	1274.6890	2021
EPL 4655	64-04	160.34	250981.9230	7391247.4450	1274.6880	2021
EPL 4655	64-AB3	153.60	251602.2700	7391477.5900	1277.0300	2021
EPL 4655	68-01	163.10	250421.2670	7391894.6460	1276.8820	2021
EPL 4655	68-02	160.80	250139.6220	7391790.1920	1276.8280	2021
EPL 4655	68-03	161.30	249955.1630	7391722.5020	1277.2290	2021
EPL 4655	68-04	158.70	250046.6670	7391757.0490	1277.1550	2021
EPL 4655	68-06	158.20	249858.7600	7391686.1770	1277.1390	2021
EPL 4655	72-01	151.58	251049.5300	7392975.2200	1279.0800	2021
EPL 4655	72-02	153.10	250865.1700	7392911.6000	1281.5300	2021
EPL 4655	72-03	162.80	250336.4170	7392714.2580	1279.4960	2021
EPL 4655	72-04	165.30	249958.2150	7392573.6280	1278.9380	2021
EPL 4655	72-05	164.40	249582.0120	7392445.2950	1281.4600	2021
EPL 4655	72-06	159.30	249486.7580	7392395.2730	1280.5440	2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	72-07	163.20	249673.3940	7392472.7900	1281.1990	2021
EPL 4655	72-08	161.30	249770.3810	7392499.9340	1281.1180	2021
EPL 4655	72-09	161.69	249393.8610	7392360.6510	1280.9800	2021
EPL 4655	72-10	161.20	249862.9040	7392533.4430	1279.5240	2021
EPL 4655	72-11	156.80	250430.2630	7392748.9950	1278.8310	2021
EPL 4655	72-12	156.30	250237.1480	7392676.1750	1279.4210	2021
EPL 4655	72-13	161.65	250048.9670	7392603.5250	1278.3990	2021
EPL 4655	76-01	159.70	250435.4340	7393603.6040	1282.5740	2021
EPL 4655	76-02	168.55	249681.4920	7393327.1290	1281.0660	2021
EPL 4655	76-03	160.45	251752.4270	7393807.3550	1280.1810	2021
EPL 4655	76-04	156.50	250055.1390	7393470.9690	1281.4540	2021
EPL 4655	76-05	146.00	250247.8920	7393531.0030	1281.3390	2021
EPL 4655	76-06	146.00	250149.2560	7393499.3090	1281.1030	2021
EPL 4655	76-07	161.30	251353.3780	7393813.7070	1279.9100	2021
EPL 4655	76-08	166.29	250957.7570	7393813.5540	1280.0550	2021
EPL 4655	76-09	113.40	252554.4570	7393810.0580	1279.6480	2021
EPL 4655	76-10	146.00	250343.3080	7393565.5770	1283.1420	2021
EPL 4655	77-01	147.40	250363.7790	7393788.1190	1282.8800	2021
EPL 4655	78-01	151.10	250667.2770	7394115.5080	1281.4270	2021
EPL 4655	78-02	153.29	250860.1030	7394187.0920	1282.0560	2021
EPL 4655	78-03	146.60	250899.4290	7394205.2060	1282.1610	2021
EPL 4655	78-04	145.50	250954.4890	7394221.4020	1282.2670	2021
EPL 4655	78-05	148.90	250294.6960	7393976.7240	1283.5850	2021
EPL 4655	79-01	153.40	250979.2800	7394446.0610	1282.5400	2021
EPL 4655	80-01	161.40	251842.2100	7394612.3720	1282.6150	2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	80-02	150.60	251281.4800	7394766.9100	1282.5900	2021
EPL 4655	80-03	150.50	251090.6800	7394698.3900	1282.6700	2021
EPL 4655	80-04	146.40	251541.6760	7394611.2210	1283.5910	2021
EPL 4655	80-05	161.54	250342.0370	7394613.6760	1283.4030	2021
EPL 4655	80-06	150.50	251379.7500	7394804.2200	1283.9600	2021
EPL 4655	80-07	150.30	250998.1100	7394665.2000	1282.2400	2021
EPL 4655	80-08	150.80	250901.1200	7394629.9200	1282.0300	2021
EPL 4655	80-09	150.27	251189.4200	7394733.6300	1282.7900	2021
EPL 4655	80-10	152.50	251753.2010	7394941.2560	1282.5570	2021
EPL 4655	80-11	146.60	251847.7050	7394974.4300	1283.3410	2021
EPL 4655	80-12-AB3	156.50	251660.6440	7394907.2310	1283.1660	2021
EPL 4655	80-AB3	150.38	250906.8500	7394630.4500	1281.9500	2021
EPL 4655	84-01	150.35	251498.3800	7395337.4600	1282.8600	2021
EPL 4655	84-02	159.40	251572.4900	7395149.2000	1282.1700	2021
EPL 4655	84-03	160.33	251918.6750	7395416.4490	1285.2970	2021
EPL 4655	84-04	147.40	251823.3630	7395440.5990	1285.1430	2021
EPL 4655	84-004-1	150.80	251212.5580	7394957.3790	1284.1260	2021
EPL 4655	84-004-2	150.70	251246.8010	7394862.6670	1283.7770	2021
EPL 4655	84-004-3	150.60	251316.1440	7394673.7980	1283.1170	2021
EPL 4655	84-004-4	150.40	251333.8560	7394632.5720	1282.8550	2021
EPL 4655	84-05	162.50	251433.4060	7395520.6120	1285.4330	2021
EPL 4655	84-06	162.38	251639.1700	7394961.4500	1283.0800	2021
EPL 4655	84-07	159.60	251674.6900	7394862.4000	1283.4800	2021
EPL 4655	84-08	155.30	251399.1000	7395612.1400	1283.4500	2021
EPL 4655	84-008-1	150.80	250943.1270	7394535.2840	1282.0530	2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	84-09	154.50	251362.2900	7395707.9600	1283.7400	2021
EPL 4655	84-10	146.55	251687.7010	7394818.3580	1283.2120	2021
EPL 4655	84-012-1	146.70	250704.3340	7394022.6820	1281.4380	2021
EPL 4655	84-012-2	152.50	250641.0970	7394213.6280	1281.8020	2021
EPL 4655	84-012-3	152.70	250600.3240	7394304.4160	1282.0490	2021
EPL 4655	84-012-4	145.60	250741.0080	7393929.1160	1280.7860	2021
EPL 4655	84-012-5	145.30	250772.9830	7393836.3720	1280.3150	2021
EPL 4655	84-016-1	165.60	251365.6970	7391069.7730	1274.7490	2021
EPL 4655	84-016-2	166.00	251332.5630	7391162.5750	1275.0660	2021
EPL 4655	84-016-3	160.86	251296.7380	7391254.3920	1275.0920	2021
EPL 4655	88-01	153.50	251955.2900	7395867.9000	1281.2400	2021
EPL 4655	88-02	153.60	252035.3600	7395806.8000	1280.8500	2021
EPL 4655	88-03	140.57	252113.7900	7395743.2280	1280.6860	2021
EPL 4655	88-04	145.50	251875.7490	7395924.2390	1281.8800	2021
EPL 4655	88-05	140.44	251796.4250	7395987.2950	1282.0920	2021
EPL 4655	88-06	141.40	252194.6810	7395686.9060	1280.3920	2021
EPL 4655	88-07	140.53	251715.6670	7396048.0780	1281.9210	2021
EPL 4655	88-08	135.60	252274.9470	7395622.9440	1280.1460	2021
EPL 4655	90-01	150.80	252075.7500	7396281.8200	1281.7100	2021
EPL 4655	90-03	153.30	251993.5700	7396344.8600	1281.8500	2021
EPL 4655	90-08	140.30	251913.9570	7396402.9950	1282.1940	2021
EPL 4655	92-01	140.70	252480.3520	7396473.0340	1281.8030	2021
EPL 4655	92-02	140.25	252394.2070	7396535.6010	1281.9830	2021
EPL 4655	92-03	140.30	252318.5310	7396583.7260	1282.0830	2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	92-04	140.19	252561.6280	7396410.7950	1281.5540	2021
EPL 4655	92-05	140.20	252236.8760	7396658.3230	1282.1800	2021
EPL 4655	92-06	140.15	252159.8200	7396718.9790	1282.2630	2021
EPL 4655	92-07	140.70	252079.5100	7396779.8900	1282.2800	2021
EPL 4655	92-08	135.16	252635.1350	7396356.6960	1281.5230	2021
EPL 4655	92-09	134.24	252678.4870	7396327.1400	1281.4850	2021

License	HOLE ID	DEPTH	EAST_TRL	NORTH_TRL	RL_TRL	YEAR
EPL 4655	92-10	135.18	252753.6900	7396264.7800	1281.4720	2021
EPL 4655	92-11	135.22	252833.7010	7396205.2550	1281.2230	2021
EPL 4655	94-AB3	141.60	252902.0000	7396660.0000	1285.0000	2021
EPL 4655	96-01	135.70	253449.4470	7396742.5720	1282.3610	2021
EPL 4655	96-02	135.65	253369.7930	7396800.5890	1282.4770	2021
EPL 4655	96-03	135.36	253208.8810	7396925.7550	1282.5490	2021
EPL 4655	98-001-01	135.65	253395.0770	7397327.9990	1285.6110	2021
EPL 4655	98-03	130.90	252913.4290	7397527.0080	1284.0630	2021
EPL 4655	98-08	131.40	253311.2740	7397220.9190	1284.0920	2021
EPL 4655	98-17	135.70	254032.3380	7396681.8370	1287.8700	2021
EPL 4655	98-18	135.70	253549.2230	7397033.3340	1284.8640	2021
EPL 4655	98-19	135.63	253468.8500	7397102.0070	1284.6540	2021
EPL 4655	101-01	136.72	253580.6390	7397573.7120	1292.6810	2021
EPL 4655	103-01	135.51	253737.6230	7398248.3110	1285.2890	2021
EPL 4655	103-02	130.54	253816.0410	7398193.0410	1284.6440	2021
EPL 4655	103-03	130.58	253896.3290	7398133.4660	1284.4620	2021
EPL 4655	103-04	130.59	253975.7620	7398071.3930	1284.2030	2021
EPL 4655	103-05	131.20	254058.9210	7398005.2160	1284.0240	2021
EPL 4655	107-01	130.70	254363.1580	7398564.4430	1285.4450	2021
EPL 4655	107-02	125.71	254282.8000	7398627.0130	1285.1930	2021
EPL 4655	107-03	125.65	254205.7550	7398687.0060	1285.9970	2021
EPL 4655	107-04	125.68	254124.9830	7398747.5850	1287.1790	2021
EPL 4655	107-05	125.80	254438.0230	7398500.5900	1284.9580	2021
EPL 4655	109-01	125.70	254822.5750	7398718.8620	1284.1970	2021
EPL 4655	113-01	130.84	255247.2530	7399374.8000	1284.7690	2021

EPL 4655	113-02	129.60	255329.0780	7399316.2850	1285.0590	2021
EPL 4655	113-03	130.60	255409.6670	7399255.6320	1285.5350	2021
EPL 4655	113-04	131.00	255171.5900	7399434.7040	1285.1800	2021
EPL 4655	125-01	152.00	258458.1210	7399958.2300	1279.7070	2021
EPL 4655	125-02	146.80	258396.3240	7399880.1770	1279.7700	2021
EPL 4655	128-04	150.40	258958.0970	7399699.3510	1284.6500	2021
EPL 4655	128-08	143.80	259038.7890	7399640.2790	1284.5740	2021
EPL 4655	128-09	140.30	259073.4080	7399609.2730	1284.2430	2021
EPL 4655	129-01	152.60	259422.1840	7399682.6930	1277.7080	2021
EPL 4655	131-AB1	185.50	259278.0000	7400149.0000	1280.0000	2021
EPL 4655	132-1re	132.70	259512.1600	7400252.1300	1281.3900	2021
EPL 4655	132-1reG	138.20	259512.1770	7400249.6760	1281.1800	2021
EPL 4655	132-2in	130.40	259503.2200	7400248.4100	1281.5200	2021
EPL 4655	132-2inG	132.00	259500.2660	7400245.9740	1281.7930	2021
EPL 4655	132-3in	132.53	259509.5600	7400265.2300	1281.4500	2021
EPL 4655	132-3inbis	132.10	259509.0060	7400261.5720	1281.5280	2021
EPL 4655	132-3inbisG	131.40	259506.2480	7400260.6060	1281.8320	2021
EPL 4655	132-4in	132.63	259522.1600	7400255.3000	1281.1300	2021
EPL 4655	132-4inG	132.00	259524.1780	7400253.2530	1281.4020	2021
EPL 4655	132-5in	150.30	259514.2600	7400240.0700	1281.4500	2021
EPL 4655	132-5inbis	131.50	259516.1720	7400242.8260	1281.4270	2021
EPL 4655	132-5inbisG	132.00	259517.9950	7400238.6040	1281.5610	2021
EPL 4655	151-AB3	140.60	263268.8870	7401440.8970	1280.6880	2021
EPL 4655	P08-02	167.90	252310.0900	7390246.2800	1275.9500	2021

EPL 4655	P09-01	276.28	230592.5940	7375546.6790	1270.4090	2021
EPL 4655	R90	135.45	252273.7000	7396130.6900	1280.9700	2021
EPL 4655	R138	135.60	259994.5000	7401060.4200	1283.6300	2021
EPL 4655	R172	135.70	266687.1390	7403880.6280	1279.8970	2021
EPL 4655	R 94	135.43	252785.0100	7396749.6700	1284.4100	2021

4 APPLICABLE LEGISLATION

Legal provisions that have relevance to various aspects of this development are listed in **Table 6** below. The legal instrument and applicable corresponding provisions are provided.

Table 6: Legal provisions relevant to this development

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
The Constitution of the Republic of Namibia as Amended	Article 91 (c) provides for duty to guard against "the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia." Article 95(l) deals with the "maintenance of ecosystems, essential ecological processes and biological diversity" and sustainable use of the country's natural resources.	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management	The development should be informed by the EMA.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	**Activity 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. **Activity 3.2** Other forms of mining or extraction of any natural resources whether regulated by law or not. **Activity 3.3** Resource extraction, manipulation, conservation and related activities.
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
Water Resources Management Act 11 of 2013	To provide for the management, protection, development, use and conservation of water resources.	The pollution of water resources should be avoided during the operation of the development.
The Ministry of Environment, Forestry and Tourism (MEFT) Policy on HIV & AIDS	MEFT has developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent and its contractor have to adhere to the guidelines provided to manage the aspects of HIV/AIDS. Experience with construction projects has shown that a significant risk is created when construction workers interact with local communities.
Minerals (Prospecting and Mining) Act 33 of 1992	This Act deals with the granting of access to mineral resources.	Compliance to this instrument is critical.
Labour Act no 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
Public and Environmental Act of 2015	Section 3 prohibits persons from causing nuisance.	Owner, contractors and employees have to comply with these legal requirements.
Nature Conservation Ordinance no 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants	Indigenous and protected plants have to be managed within the legal confines.
Atmospheric Pollution Prevention Ordinance (No. 11 of 1976).	The Ordinance objective is to provide for the prevention of the pollution of the atmosphere, and for matters incidental thereto.	All activities on the site will have to take due consideration of the provisions of this legislation.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
Hazardous Substance Ordinance, No. 14 of 1974	The ordinance provides for the control of substances which may cause injury or ill-health or death of human beings because of their toxic, corrosive, irritant, strongly sensitizing or flammable nature.	The waste generated on site and at the campsite should be suitably categorized / classified and disposed of properly and in accordance with the measures outlined in the Ordinance and Bill.
Roads Ordinance 17 of 1972	This Ordinance consolidates the laws relating to roads.	The provisions of this legislation have to be taken into consideration in as far as access to the development site is concerned.
Roads Authority Act, 1999	Section 16(5) of this Act places a duty on the Roads Authority to ensure a safe road system.	Some functions of the Roads Ordinance 17 of 1972 have been assigned to the Roads Authority.
Petroleum Products and Energy Act of 1990	This Act regulates the on-site storage of fuel amongst others	The storage of fuel for the use of machinery should adhere to the relevant legislation.
Heritage Act, 2004 (Act No. 27 of 2004)	The Heritage Act of 2004 makes provision for the developer to identify and assess any archaeological and historical sites of significance. The existence of any such sites should be reported to the Monuments Council as soon as possible. The Council may serve notice that prohibits any activities as prescribed within a specified distance of an identified heritage/archaeology site.	In an event that the Proponent comes across any archaeological or historical sites of significance, they should report immediately to the Monuments Council.

5 ROLES AND RESPONSIBILITIES

This Environmental Management Plan (EMP) shall clearly state the roles and responsibilities of all stakeholders to ensure that the EMP is fully implemented. The Proponent shall appoint an overall responsible person (Environmental Control Officer) to ensure the

successful implementation of the EMP. The Environmental Control Officer needs to have qualifications and knowledge in environmental management implementation.

5.1 Competent Authority

The competent authority will be, the Department of Environmental Affairs: Ministry of Environment Forestry and Tourism. They will be responsible for the review and approval of the updated EMP.

5.2 Proponent

The Proponent (Headspring Investments (Pty) Ltd), has the overall responsibility for all financial and work force provisions, which will facilitate the implementation of this EMP. The Proponent is responsible for the appointment of other personnel responsible for the implementation of this EMP.

The Proponent is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase of this development, if the development is in future decommissioned. The Proponent will delegate this responsibility as the project progresses through its life cycle.

5.3 Exploration Manager

The Exploration Manager is required to carry out the overall responsibility for the implementation of the EMP and to ensure that all required resources and mechanisms for environmental management are in place. The responsibilities of the Exploration Manager will be:

- Ensure that the Proponent's responsibilities are executed in compliance with the relevant legislation;
- Ensure that all the necessary environmental authorizations and permits have been obtained;
- Assist the exploration contractor/s in finding environmentally responsible solutions to challenges that may arise;
- Should the EM be of the opinion that a serious threat to, or impact on the environment may be caused by the exploration activities, he/she may stop work; the proponent must be informed of the reasons for the stoppage as soon as possible;
- The EM has the authority to issue fines for transgressions of basic conduct rules and/or contravention of the EMP;
- Should the Contractor fail to show adequate consideration for the environmental

aspects related to the EMP, the EM can have person(s) and/or equipment removed from the site or work suspended until the matter is remedied.

5.4 Health Safety and Environmental Officer (HSEO)

The HSEO is overall responsible of all environmental issues and safety of employees. The Proponent is to appoint a Health, Safety and Environment Officer (HSEO) with the following responsibilities with respect to the EMP implementation:

- Responsible of all environmental issues and safety of employees;
- Assist the EM in ensuring that the necessary environmental authorizations and permits have been obtained;
- Assist the EM and Contractor/s in finding environmentally responsible solutions to challenges that may arise;
- Carry out regular site inspections of all exploration areas with regards to compliance with the EMP; report any non-compliance(s) to the EM as soon as possible;
- Organize for an independent internal audit on the implementation of and compliance to the EMP to be carried out half way through each field-based exploration activity; audit reports to be submitted to the EM;
- Continuously review the EMP and recommend additions and/or changes to the EMP document;
- Monitor the Contractor's environmental awareness training for all new personnel coming on site; Keep records of all activities related to environmental control and monitoring; the latter to include a photographic record of the exploration activities, rehabilitation process and a register of all major incidents;
- Attend regular site meetings;
- The HSEO should record and report all incidents on site.

5.5 Environmental Control Officer (ECO)

Required to take independent responsibility of the implementation of this EMP. ECO is contracted to conduct periodic auditing of the sites, compilation of bi-annual and annual reports to be submitted to MEFT: DEA for renewal of the environmental clearance certificate.

5.6 Contractors and Subcontractors

All contractors, subcontractors and service providers are ultimately responsible for:

- Complying with the relevant legislation and EMP provisions;
- Provide Environmental; Method Statements to the Exploration Manager with regards to how certain activities on-site will be conducted;

- Adhering to environmental instructions issued by the EM;
- Arrange that all the contractor's employees receive training. Trainings have to be appropriate for the level of the tasks and functions undertaken.

The Environmental Method Statement referred to above will cover applicable details with regard to:

- Equipment to be used;
- Getting the equipment to and from site;
- How the equipment will be moved while on-site;
- How and where material will be stored;
- The containment (or action to be taken if containment is not possible) of leaks or spills of any liquid or material that may occur;
- Identified potential impacts of the activity and mitigation measures thereof;
- Compliance/non-compliance with the Environmental Specifications; and
- Any other information deemed necessary by the EM.

5.7 Employees

Required to follow instructions as directed by the EM. Report any potential environmental issues to the EM, HSEO or supervisor at site.

6 MANAGEMENT ACTIONS

The following tables form the core of this EMP for the exploration phase. The Proponent should continue to implement the proposed mitigation measures during the exploration phase. If the need arises, the Proponent can add additional measures to the EMP as the aim is to protect the environment. The below information shown in the tables, should be used as a checklist for environmental monitoring and auditing on site.

6.1 Management of Negative Impacts Associated with Exploration Phase:

6.1.1 Impact on landscape

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Landscape	The scenery view of the site might be affected by clearing vegetation to pave way for the following activities: - Establishment of exploration camps - Exploration drilling - Hydrogeological drilling - Clearing for access roads	▪ Removed rocks and soil should be replaced back and levelling of the area done so as to try to restore the area to its natural state. ▪ Do not cut down vegetation unnecessary around the site. ▪ Maximise on using existing roads and minimise on creating new access roads, no off-road that could result in land scarring is allowed. ▪ Minimise the presence of secondary structures: remove inoperative support structures. ▪ Remove all infrastructure and reclaim, or rehabilitate the project site after exploration activities are completed.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & Subcontractors ▪ Appointed Environmental Control Officer

6.1.2 Impact on fauna

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Fauna	Noise generated from the following exploration activities might disturb animals: - Drilling activities - Movement of vehicles - Walking and talking In addition, wild animals might also be at risk if exploration personnel practice poaching or smoking at the site. Smoking might result in fires.	▪ Poaching of wildlife and indiscriminate killing of perceived dangerous species (e.g., snakes, etc.) shall not be allowed. ▪ A drilling interval should be established, used and adhered to. ▪ Working hours should be limited to minimum of 8 hours per day. ▪ Noise should be addressed and mitigated at an early stage. ▪ Proper and timely maintenance of machineries and vehicles to prevent noise. ▪ Avoid driving randomly rather stick to permanently placed roads/tracks. This would minimise the effect on localised potentially sensitive habitats in the area. ▪ Stick to speed limits of maximum 30km/h as this would result in fewer faunal road mortalities. ▪ Avoid disturbance of habitat areas such as big trees, boulders, rocky outcrops as these areas serve as habitat for a myriad of fauna. ▪ Prevent and discourage fires as this results in loss of grazing & fauna mortalities. ▪ No foodstuff should be left lying around as this will attract animals which might result in human-animal conflict.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractors ▪ Environmental Control Officer

6.1.3 Vegetation Loss

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Vegetation Loss	Clearing of vegetation will be done to pave way for the following activities: - Exploration drilling - Hydrogeological drilling - Exploration camps - Access roads However, no massive clearing shall be done. Existing roads shall be used and new roads shall only be created when there is need. In cases that vegetation is removed this will cause habitat destruction for both ground dwelling species and tree dwelling species. The ecosystem food chain on and around the area will also be broken. The Proponent should continue to safeguard the flora of the area so as to prevent habitat destruction for both ground and tree habitants.	▪ Protected plant species shall not be removed ▪ Massive clearing shall not be allowed. ▪ All the major trees will be preserved and the activities will fit into the environment without affecting the trees. ▪ Exploration personnel shall not be allowed to cut trees for firewood. ▪ Environmental considerations will be adhered to at all times before clearing roads, drilling and establishing exploration camps. ▪ Prevent and discourage fires as this affect the grazing land and also the flora.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor ▪ Environmental Control Officer

6.1.4 Impact of waste

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Impact of waste	Waste generated might either be general or hazardous waste. General waste includes papers, food leftovers etc while hazardous waste includes oil leaks and spills.	▪ Burial of waste within the EPL area shall not be allowed, all generated waste must be disposed at an approved municipal waste disposal site. ▪ Strictly, no burning of waste on the site shall be allowed as it possess environmental and public health impacts. ▪ Minimize solid waste generated on site (reduce, reuse, or recycle). ▪ Excavation waste should be re-used or backfilled. ▪ Portable toilets and ablution facilities must be provided on site and should not be located close to Ephemeral Rivers or visible discontinuities (fractures, joints or faults). ▪ Provide waste disposal bins and never dispose of hazardous waste in the bins intended for general waste. ▪ No littering shall be allowed. ▪ **Hazardous Waste** ▪ Machinery should be well maintained to prevent oil leaks. ▪ Contractor should only be allowed to store oil/fuel.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

		on site provided the site store has containment to prevent oil/fuel permeating into the soil in cases of spillages. ▪ Contaminated wastes in the form of soil, litter and other material must be disposed off at an appropriate disposal site. ▪ Servicing of machinery or vehicles on site shall not be allowed. ▪ Use drip trays to capture oil drips and spills from machinery or vehicles.		

6.1.5 Impact on surface and groundwater

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Surface and groundwater	Within the EPL there is a pan. Possible sources which might cause pollution include; oil and fuel leakages from vehicles and drilling machines thus if spillages happen in large volumes or frequently. Drilling activities might interact with the water table hence the need for hydrogeological wells to monitor for any contamination.	▪ Installation of hydrogeological wells to monitor groundwater. ▪ Conduct water sampling tests to use as a benchmark. ▪ Water sampling tests to be conducted after all activities interacting with underground or surface water sources. For transparency seek, affected landowners / farmers must be given full access to the water test results. ▪ Drill water source should be from either, treated water from a mains supply, clean/treated surface waters or groundwater of a satisfactory quality. ▪ Use appropriate additives in broken or fractured bedrock to prevent ingress into the aquifer. ▪ Ensure additives are non-hazardous, non – toxic and biodegradable. ▪ Proper storage of fuel. ▪ Proper disposal of contaminated waste. ▪ Use of drip trays.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.1.6 Air quality

Impacts	Description	Mitigation Measures	Project Phase	Responsibility
Air quality	Sources of air quality pollution will be; - Dust from vehicles and drilling machinery. - Emissions from vehicles and drill rigs. People at risk are likely to be exploration personnel working on the immediate surrounding. Accumulation of dust might lead to respiratory problems.	▪ Soil watering when soil works are being executed and where dust is emitted ▪ Control speed and operation of exploration vehicles. ▪ Prohibit idling of vehicles. ▪ Workers should be provided with dust masks if working in sensitive areas. ▪ Regular monitoring to ensure safe operation.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.1.7 Impact on soil

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Soil	Soil will be disturbed during drilling and also it might be affected by oil or fuel leakages from machines and vehicles. However, comparing with trenching, drilling does not cause significate impact on the soil.	▪ After completion of exploration activities removed soil layers must be replaced and levelling must be done so that the original condition is restored. ▪ Proper care should be taken so that there is no spill that would cause soil contamination. ▪ If any hazardous waste is produced it should be properly handled and sent for disposal to appropriate disposal areas.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.1.8 Noise

Impacts	Description	Mitigation Measures	Project Phase	Responsibility
Noise	Noise might be generated from: - Drilling activities - Frequent movement of vehicles The Proponent should continue to safeguard against noise as excessive noise can affect exploration personnel and animals. High noise levels can inhibit worker communication; reduce productivity and increase the chances of accidents. Prolonged exposure to excessive noise can result in permanent hearing loss and health problems such as sleep disturbance. However, farm owners are unlikely to be affected given that the exploration activities are conducted far from the farm houses.	▪ A drilling interval will be established, used and adhered to. ▪ Working hours should be limited to minimum of 8 hours per day. ▪ Noise should be addressed and mitigated at an early stage. ▪ Proper and timely maintenance of machineries and vehicles. ▪ Employees to be equipped with ear protection equipment. ▪ Limit vehicle movements and adhere to speed limits. ▪ National or international acoustic design standards must be followed.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.2 Management of Socio-Economic Impacts Associated with Exploration Phase

6.2.1 Occupational Health and Safety

Impact	Description	Mitigation Measures	Project Phase	Responsibility
OHS	Noise, dust, occupational stress, working in hot environments, bushfires, ionising radiation and remoteness of exploration area are some of the occupational hazards associated with the exploration phase. To note, currently the exploration personnel are mainly exposed to natural radiation of the area. However, precautions are being taken for personnel working with Core samples. The personnel carry radiometers to measure the intensity of the natural radiation levels so as to determine whether it is safe to work within the area.	▪ Conduct Hazard identification and risk assessments ▪ Comply with all Health and Safety standards specified in the Labour Act. ▪ Provide all staff on site with relevant and adequate protective clothing and equipment (helmets, gloves, respirators, work suits, earplugs, goggles and safety shoes where applicable). ▪ Use of dust suppression measures. ▪ Reduce noise exposure by isolating noisy equipment and rotate tasks. ▪ Provision of First Aid at the site ▪ Provisions of immediate accident/incident reporting and investigation. ▪ Safety Posters and slogans should be exhibited at conspicuous places. ▪ Employer should allocate time for employees to visit their families. ▪ No person under the influence of alcohol or drugs is allowed to work on site. ▪ Train workers on personal safety and disaster preparedness. ▪ Continuous and vigilant monitoring of the radiation levels.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.2.2 Damage to roads

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Damage to roads	Frequent movement of vehicles and machinery have the possibility of degrading the existing roads.	▪ Do not drive randomly throughout the area ▪ Where access roads have to be established, the routes should be selected causing minimal damage to the environment – e.g. use the same tracks; cross drainage lines at right angles; avoid placing tracks within drainage lines; avoid collateral damage (i.e. select routes that do not require the unnecessary removal of trees/shrubs, especially protected species). ▪ No drilling equipment allowed on farms during the rainy season. ▪ Leave vehicles on tracks and walk to point of interest, when possible. ▪ Rehabilitate new tracks created.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.2.3 Impacts associated with camping of exploration staff

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Impacts associated with camping of exploration staff	Establishment of camps and associated camping results in effects such as clearing of vegetation and in some cases poor housekeeping and fires.	▪ Select camp sites and other temporary lay over sites with care – i.e. avoid important habitats (e.g. raptor breeding sites). ▪ No visitors allowed ▪ Ablution facilities to be provided in the form of portable toilets. ▪ Good housekeeping. ▪ No poaching or collecting of unique plants (e.g., various Aloe and Lithop). ▪ Smoking and drinking alcohol shall not be allowed on sit. ▪ Remove and relocate slow moving vertebrate fauna to suitable habitat elsewhere on property ▪ Avoid the removal and/or damaging of protected flora and big trees. ▪ Ensure that adequate firefighting equipment is available at camp sites and clear kitchen areas to avoid accidental fires. ▪ Exploration personnel should aim to protect the environment.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor ▪ Environmental Control Officer

6.2.4 Heritage impact

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Heritage impact	At the site, there are no known heritage areas or artefacts deemed to be impacted by the exploration activities.	▪ All works are to be immediately ceased should an archaeological or heritage resource be discovered. ▪ The National Heritage Council of Namibia (NHCN) should advise with regards to the removal, packaging and transfer of the potential resource.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO

6.2.5 Risk and spread of HIV/AIDS

Impacts	Description	Mitigation Measures	Project Phase	Responsibility
HIV/AIDS	Even though a few people are employed at this stage (exploration), the disease might still spread hence the need for continuous sensitisation.	▪ Employer should allocate time for employees to visit their families. ▪ Free distribution of condoms.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor

6.2.6 Population Influx

Impacts	Description	Mitigation Measures	Project Phase	Responsibility
Population Influx	Headspring Investments (Pty) Ltd has its exploration personnel and it also contracts local companies for drilling and other activities associated with exploration. This has an effect of increasing the number of people in the area. Security might also be compromised given that new people from different areas will come either in search of work or offering different services.	▪ Local employment should be a priority so as to reduce the number of outsiders. ▪ Contractors should submit a code of conduct and disciplinary actions should be in accordance with Namibian legislation. ▪ An access agreement to be signed prior to exploration. ▪ No gates to be left open or fences damaged ▪ An identification document with all exploration staff to be supplied to farm owners prior to exploration. ▪ All staff to carry identification badges.	Exploration Phase	▪ Proponent ▪ Exploration Manager ▪ HSEO ▪ Contractor & subcontractor

6.3 Positive Impacts Associated with the Project

6.3.1 Employment creation

Impact	Description	Enhancement Required	Project Phase	Responsibility
Employment creation	Currently the Proponent employed the exploration personnel which include; the exploration manager, mine manger, geologist etc. The Proponent also contracted local companies to carry out drilling activities. In addition, locals are also benefiting as they are being employed on non- skilled jobs. The Proponent is also currently renting accommodation for its employees hence indirectly creating employment for locals in this remote area. Even though a few people are currently employed during the exploration phase, if medium to minable deposits are found and mining activities start, many people will be employed. This project therefore is definitely going to be beneficial in future.	▪ Employ locals in all casual labour and ensure gender equality. ▪ Equity, transparency, to be put into account when hiring and recruiting.	Exploration Phase	▪ Proponent

6.3.2 Social responsibility

Impact	Description	Enhancement Required	Project Phase	Responsibility
Social responsibility	Headspring Investments (Pty) Ltd participates in community development programmes.	▪ Continue promoting community development programmes.	Exploration Phase	▪ Proponent

6.3.3 Generation of Revenue

Impact	Description	Enhancement Required	Project Phase	Responsibility
Generation of Revenue	Headspring Investments (Pty) Ltd pays tax hence generating revenue.	▪ The Proponent, Contractors and subcontractors to pay taxes as stipulated by the law of Namibia.	Exploration Phase	▪ Proponent ▪ Contractor & subcontractor

6.3 Management of Impacts at Post-Exploration Phase

Impact	Description	Mitigation Measures	Project Phase	Responsibility
Post-exploration stage	The stage of exploration is expected to have minimum damage to the environment as compared to mining. However, the major issue which need to be looked after the phase of exploration is how the project has impacted the environment. To note, current measure already in place include backfilling and sealing the exploration wells thus after exploration of the site. The exploration team will only move to the next site after rehabilitating the area they have been working on. A general consensus is made between the landowner and Proponent if the land has been rehabilitated well.	▪ All holes or pits shall be backfilled or contoured to a stable angle of repose. ▪ Remove all exploration temporary structures on site and ensure the area is left clean. ▪ Water sampling results for the exploration phase should be available and an analysis should be done to check if groundwater was impacted. ▪ Rehabilitate any area disturbed by the exploration activities.	Post-exploration Phase	▪ Proponent

7 ENVIRONMENTAL MONITORING

A monitoring programme will be in place to ensure conformance with the EMP. The Environmental Control Officer will ensure compliance with the EMP, and carry out monitoring/auditing activities. The Environmental Control Officer must have the appropriate experience and qualifications to undertake the necessary tasks. The Environmental Control Officer will report to the Proponent should any non-compliance be evident or corrective action necessary. The Proponent may opt to engage the services of an independent Environmental Consultant to undertake the monitoring and auditing activities. The suggested monitoring details are outlined in Table 7 below.

Table 7: Monitoring activities

IMPACTS	RECEPTORS	TYPE OF MONITORING	PERIOD/TIME
Alternation of existing landscape	Environment	▪ Inspections	▪ During and after drilling
Dust	Employees	▪ Regular site inspections	▪ Daily
Impact on fauna	Environment	▪ Inspections	▪ Period of drilling
Surface & groundwater Pollution	Environment	▪ Hydrogeological tests	▪ During and after activities that interact with underground and surface water bodies
Noise	Employees & Fauna	▪ Noise monitoring	▪ Daily
Vegetation loss	Environment	▪ Inspection of protected plant species and big trees and incorporate them into the development	▪ Period of establishing exploration camps ▪ Period of drilling ▪ Period of creating access roads.
Heritage	Land	▪ Inspection	▪ Period of exploration
O.H. S	Employees	▪ Site inspection ▪ Conducting Hazard and Risk Assessments	▪ Daily
Impact on soil	Environment.	▪ Site inspections	▪ Period of exploration
Generation of waste (solid)	Land	▪ Site inspection on housekeeping ▪ Regular collection of waste	▪ Daily ▪ Weekly
HIV/AIDS	Employees	▪ Free testing	▪ Annually

8 CONCLUSION

It is recommended that the application for renewing the Environmental Clearance Certificate (ECC) for EPL 4655 be approved, conditional upon rigorous implementation of the Environmental Management Plan (EMP). Adherence to the EMP will mitigate potential environmental impacts and ensure compliance with regulatory standards. The applicant bears responsibility for ensuring the EMP is contractually binding for all contractors involved and for enforcing its provisions as a mandatory on-site reference. Any party found in violation of the EMP must bear responsibility for necessary rehabilitation measures, including costs and corrective actions.

8.1 RECOMMENDATIONS

The following recommendations have been brought forward:

- Environmental monitoring by an independent environmental consultancy must be carried out during the exploration phase to monitor environmental compliance.
- Bi- annual and annual reports should be written and submitted to MEFT.
- These monitoring reports should accompany the application for renewal of the environmental clearance certificate after 3 years

9 REFERENCES

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Appendix A – Old ECC

ECC – 02209 Serial: unlvuB2209

REPUBLIC OF NAMIBIA
MINISTRY OF AGRICULTURE, WATER AND LAND REFORM
09 SEP 2022
Private Bag 13184, Windhoek
Directorate of Water Resource Management

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

Headspring Investments (Pty) Ltd
P. O. Box 318, Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

The Exploration Activities on Exclusive Prospecting Licenses (EPL) No. 4655, in the Gobabis/Mariental Districts, Omaheke/Hardap Regions, Namibia.

01 JUL 2022
ENVIRONMENTAL COMMISSIONER

Issued on the date: 2022-07-01
Expires on this date: 2025-07-01

(See conditions printed over leaf)

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ECC –

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 the operational phase of the project
4. -
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.

Appendix B – Site Images

Site image: Typical vegetation around the EPL area

Site image: Core sample storage facility

Site image: Typical exploration well

Site image: Typical monitoring well

Appendix C – Supporting Documents

REPUBLIC OF NAMIBIA

MINISTRY OF AGRICULTURE, WATER AND LAND REFORM

Telephone: (061) 2087228
Fax: (061) 208 7697
Enquiries: J N Mouton
Reference: PL General/PR General

Department of Water Affairs
Private Bag 13193
WINDHOEK
Namibia

The Senior Administrator
Mr Aldo Hengari
Headspring Investments (Pty) Ltd
P O Box 318
WINDHOEK

Dear Sir

NON-COMPLIANCE WITH PERMIT CONDITIONS: PERMIT NO. 11561 ISSUED FOR THE DRILLING OF NINETEEN BOREHOLES FOR EXPLORATION PURPOSES AND PERMIT NO. 11562 ISSUED FOR THE DRILLING OF EIGHTEEN BOREHOLES FOR HYDRO-GEOLOGICAL PURPOSES.

1. Permits 11561 and 11562 were issued to Headspring Investments (Pty) Ltd on 30 March 2021, exploration and hydro-geological purposes, respectively.

2. The Ministry of Agriculture, Water and Land Reform carried out a site visit on October 2021 and is extremely concerned about Headspring Investments (Pty) Ltd's non-compliance with permit conditions 8 and 9 of Permit No. 11561, and 9 and 10 of Permit No. 11562 among others.

3. Specifically, the following gross violations were observed:

   3.1 The boreholes to be drilled for hydro-geological study purposes have actually been drilled in a specific pattern mimicking that of an in-situe leaching technique proposed in a Background Information Document prepared by the Consultant hired to carry out the EIA process for that.

   3.2 The exploration boreholes are **not being drilled** as per the permit conditions, where drilling activities require that the Kalahari aquifer be cased off and grouted before drilling into the Auob aquifer.

   3.3 Some of the exploration boreholes are left open for long periods of time, allowing the mixing to last even longer, forming pathways for the contaminants to enter the subsurface and unsealed boreholes are potential lock falls for livestock or wildlife.

All official correspondence must be addressed to the Executive Director

3.4 For the hydro-geological study boreholes, a plain steel casing is installed to the depth of 60m, way above the Rietmond Layer (blue shale). The Kalahari aquifer was struck below the 70m in almost all the boreholes, while the Auob aquifer below 100m. The cementing is done only later after PVC casing installation and gravel packing.

4. Additionally,

4.1 You have not made the permit conditions available to the drilling contractors, hence the driller, almost if not all of whom where drilling in the area for the first time, and not registered with this Ministry, were not aware of the special drilling specifications for the Stampriet Artesian aquifer system.

4.2 At least 70 more boreholes have been drilled for exploration purposes without a valid permit.

4.3 At least 7 more boreholes have been drilled for hydro-geological study purposes without a valid permit.

5. Based on the above gross violations and non-compliance of permit major conditions Permit No. 11561 and Permit No. 11562 is hereby withdrawn as per condition number, 5(a) and 6(a) respectively, with immediate effect and no further drilling is permitted.

6. You are requested to submit all information as per permit conditions 8.8 for Permit No. 11561 and 9.11 for Permit No. 1156. You are advised to consult Mr. B Swartz (Tel. 061-2087089) of the Geohydrology Division in the Directorate of Water Resources Management in this Ministry for further information.

7. Immediately return Permit No. 11561 and Permit No. 11562 dated 18 March 2021 back to this Ministry for cancellation.

REPUBLIC OF NAMIBIA
MINISTRY OF AGRICULTURE, WATER AND LAND REFORM
09 NOV 2021
Private Bag 13184, Windhoek
Directorate of Water Resource Management

Percy W. Misika
EXECUTIVE DIRECTOR