BLACK MAGIC BRIQUETTES CC

ENVIRONMENTAL MANAGEMENT PLAN (EMP) REPORT

FOR

THE EXISTING BRIQUETTES PRODUCTION FACILITY

LOCATED APPROXIMATELY 6 KM WEST OF KARIBIB, ERONGO REGION, NAMIBIA.

JUNE 2025

DOCUMENT CONTROL	
REPORT TITLE	EMP REPORT FOR THE EXISTING BRIQUETTES PRODUCTION FACILITY, LOCATED APPROXIMATELY 6 KM WEST OF KARIBIB TOWN, ERONGO REGION
PROJECT NO.	JD69
CONSULTANT	I.N.K ENVIRO CONSULTANTS CC P.O BOX 31908 WINDHOEK NAMIBIA
CLIENT	BLACK MAGIC BRIQUETTES CC P.O BOX 97343 MAERUA MALL WINDHOEK NAMIBIA
DATE	JUNE 2025
CURRENT REVISION	FINAL REPORT
AUTHOR	MR. IMMANUEL KATALI

CONSULTANT'S EXPERTISE

I.N.K Enviro Consultants cc is the independent firm of consultants that has been appointed by Black Magic Briquettes cct o undertake the environmental impact assessment process.

Immanuel N. Katali, the EIA Lead Practitioner holds a B.Arts (Honors) in Geography, Environmental Studies and Sociology and has over nine years of relevant experience in conducting/managing Environmental Impact Assessments (EIAs), Socio-Economic Impact Assessments (SIA) and compiling Environmental Management Plans (EMPs) in Namibia. Immanuel is certified as an environmental practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

DECLARATION OF INDEPENDENCE AND DISCLAIMER

The consultant herewith declare that this report represents an independent, objective assessment of the environmental impacts associated with the activities of the proposed small-scale mining activities on the request of Black Magic Briquettes.

I.N.K has prepared this report based on an agreed scope of work and acts in all professional matters as an independent environmental consultant to Black Magic Briquettes and exercises all reasonable skill and care in the provision of its professional services in a manner consistent with the level of care and expertise exercised by members of the environmental profession.

The information, statements and commentary contained in this Report have been prepared by I.N.K from information provided by Black Magic Briquettes and from discussions held with stakeholders. I.N.K does not express an opinion as to the accuracy or completeness of the information provided, the assumptions made by the party that provided the information, or any conclusions reached. I.N.K has based this Report on information received or obtained, on the basis that such information is accurate and, where it is represented to I.N.K as such, complete.

I.N.K is not responsible and will not be liable to any other person or organisation for or in relation to any matter dealt within this report, or for any loss or damage suffered by any other person or organisation arising from matters dealt with or conclusions expressed in this report (including without limitation matters arising from any negligent act or omission of I.N.K or for any loss or damage suffered by any other party relying upon the matters dealt with or conclusions expressed in this report). This report must not be altered or added to without the prior consent of I.N.K and Black Magic Briquettes.

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

1 INTRODUCTION

1.1 Introduction to the Proposed Project

Black Magic Briquettes (hereinafter referred to as BMB) cc currently operates a briquette production facility, Located on Farm Singberg, Approximately 6 km West of Karibib Town, Erongo Region, Namibia. The facility, measuring approximately 13,225 square meters (m^2), is in pursuit of good environmental practice and to comply with Namibian Environmental Legislation. Black Magic Briquettes therefore, intends to seek an Environmental Clearance Certificate (ECC) and conduct its operations in accordance with an approved Environmental Management Plan.

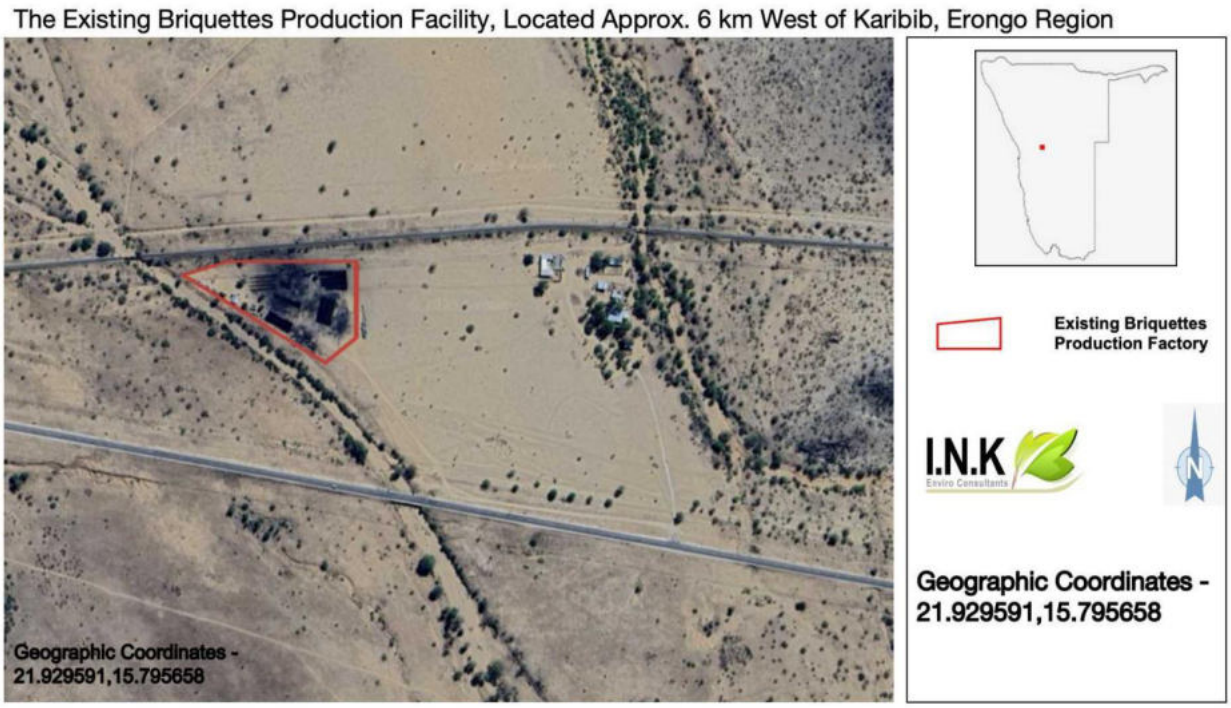

Figure 1: Locality Map

An environmental clearance certificate is required from the Ministry of Environment, Forestry and Tourism (MEFT): Department Environmental Affairs (DEA) based on an approved EIA process, in terms of the Environmental Management Act, 2007 (No. 7 of 2007). It is with this background that, I.N.K Enviro Consultants cc (I.N.K), an independent firm of consultants, is appointed to undertake the Environmental Impact Assessment (EIA) process for this project.

1.2 Briquettes Production Process Flow

BMB procures 100% charcoal fines from the Namibia Retort Charcoal (NRC), which are transported via trucks and subsequently offloaded at the designated storage area of the production facility. These fines are subsequently crushed and then mixed with starch and water before being compressed into briquettes.

These briquettes are positioned in an open area, atop an impermeable sheet, to prevent direct contact with the ground. Alternatively, they may be placed in crates for the drying process; however, this method of drying is lengthy. Once the briquettes have thoroughly dried, they are immediately packed into bulk bags and stored at the facility prior to being

loaded onto trucks for transportation to NRC. Please refer to the process flow diagram in Figure 2 below.

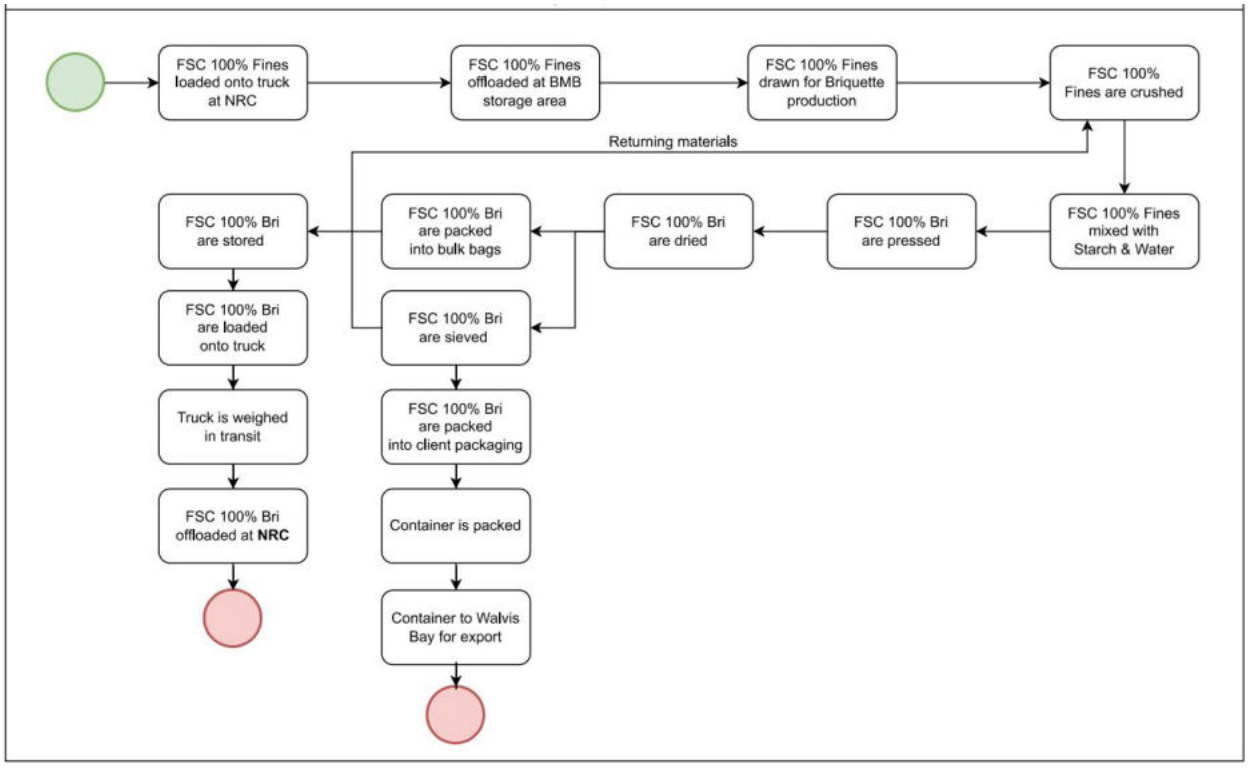

Figure 2: Process Flow Diagram

1.3 Environmental Management Plan (EMP)

This EMP report serves as a managing tool for the development of the Briquettes Production Facility. The report details actions to ensure compliance with regulatory bodies and that environmental performance is verified through information on impacts as they occur.

The EMP will be implemented during the operations phase with the intention of implementing the recommended mitigation measures.

The document further serves as a guiding tool for the proponent, contractors and workforce on their roles and responsibilities concerning environmental management on site and provides an environmental monitoring framework for all project phases of the proposed activities. This environmental management plan aims to take a proactive route by addressing potential problems before they occur.

EMP implementation is a cyclical process that converts mitigation measures into actions and through cyclical monitoring, auditing, review and corrective action, ensures conformance with stated EMP aims and objectives. Through monitoring and auditing feedback for continual improvement in environmental performance must be provided and corrective action taken to ensure that the EMP remains effective.

1.4 Details of the persons who compiled this ESMP

I.N.K Enviro Consultants cc is the independent firm of environmental consultants that has been appointed to compile the EMP prior to the construction and operations activities.

Immanuel N. Katali, the Environmental Assessment Practitioner holds a B.Arts (Honors) Geography, Environmental Studies and Sociology and has over nine (9) years of relevant experience in conducting/managing Environmental Impact Assessments (EIAs), and Environmental Compliance/Monitoring Audits in Namibia. Immanuel is certified as an Environmental Assessment Practitioner under the Environmental Assessment Professionals Association of Namibia (EAPAN).

2 EMP ADMINISTRATION

Copies of the EMP shall be kept at the site and will be distributed to all senior contract personnel. All senior personnel shall be required to familiarize themselves with the contents of this document.

3 Applicable Laws and Guidelines

The Republic of Namibia has five tiers of law and a number of policies relevant to environmental assessment and protection, which includes:

- The Constitution.
- Statutory law.
- Common law.
- Customary law.
- International law.

Relevant policies currently in force include:

- The EIA Policy (1995).
- Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1994).
- The National Climate Change Policy of Namibia (September 2010).
- Policy for the Conservation of Biotic Diversity and Habitat Protection (1994).

As the main source of legislation, the Constitution of the Republic of Namibia (1990) makes provision for the creation and enforcement of applicable legislation. In this context and in accordance with its constitution, Namibia has passed numerous laws intended to protect the natural environment and mitigate against adverse environmental impacts.

The management and regulation of the proposed activities falls within the jurisdiction of the Ministry of Mines and Energy (MME), with environmental regulations guided and implemented by the Department of Environmental Affairs (DEA) within the Ministry of Environment, Forestry and Tourism (MEFT).

The section below summarised the various applicable laws and policies, international treaties and protocols.

3.1 Applicable Laws and Policies

In the context of the proposed activities, there are several laws and policies currently applicable. They are reflected in Table below.

Table 1: relevant legislation and policies

YEAR	NAME	Natural Resource Use (energy & water)	Emissions into the air (fumes, dust & odours)	Emissions to land (non-hazardous & hazardous	Emissions to water (industrial & domestic)	Noise (remote only)	Visual	Vibrations	Impact on Land use	Impact on biodiversity	Impact on Archeology	Emergency situations	Socio-economic	Safety & Health	Other
1990	The Constitution of the Republic of Namibia of 1990	X	X	X	X	X	X	X	X	X	X	X	X	X	
1997	Namibian Water Corporation Act, 12 of 1997	X											X		
2013	Water Resources Management Act 11 of 2013	X			X								X		
2004	National Heritage Act 27 of 2004										X			X	
2007	Environmental Management, Act 7 of 2007	X	X	X	X	X	X	X	X	X	X		X	X	
2012	Regulations promulgated in terms of the Environmental Management, Act 7 of 2007	X	X	X	X	X	X	X	X	X	X	X	X	X	X
1975	Nature Conservation Ordinance 14 of 1975	X			X					X	X				
1976	Atmospheric Pollution Prevention Ordinance 11 of 1976		X												
1995	Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation	X	X	X	X	X	X	X	X	X	X	X		X	

YEAR	NAME	Natural Resource Use (energy & water)	Emissions into the air (fumes, dust & odours)	Emissions to land (non-hazardous & hazardous	Emissions to water (industrial & domestic)	Noise (remote only)	Visual	Vibrations	Impact on Land use	Impact on biodiversity	Impact on Archeology	Emergency situations	Socio-economic	Safety & Health	Other
2004	Pollution Control and Waste Management Bill (3rd Draft September 2003)		X	X	X	X									
1990	Petroleum Products and Energy Act, No. 13 of 1990		X	X	X					X				X	X
1974	Hazardous Substance Ordinance No. 14 of 1974	X	X	X						X		X		X	

3.2 National Policies and Plans

Namibia's policies provide the framework to the applicable legislation. Whilst policies do not often carry the same legal recognition as official statutes, policies are used in providing support to legal interpretation. Relevant policies and plans currently in force include:

- The EIA Policy (1995).
- Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1995).
- White Paper on the Energy Policy, 1998.
- Namibia Vision 2030.
- National Development Plan, 201/2018 – 2021/2022, guided by Vision 2030.
- Policy for the Conservation of Biotic Diversity and Habitat Protection, 1994.
- Namibia's Second National Biodiversity Strategy and Action Plan (2013-2022).
- National Environmental Health Policy (2002).
- National Waste Management Policy (2010).
- The National Climate Change Policy of Namibia (September 2010).
- New Equitable Economic Empowerment Framework Policy, 2011.
- National Rangeland Management Policy and Strategy of 2012

3.3 Summary of Applicable Namibian legislation and standards

In the context of the Project and associated infrastructure, the following legislation is applicable:

- The Public Health Act 36 of 1919.

- Air Quality Act (No. 39 of 2004).
- Water Act, 1956 (No. 54 of 1956), as amended.
- Soil Conservation Act 76 of 1969.
- Nature Conservation Ordinance 14 of 1975.
- Atmospheric Pollution Prevention Ordinance 11 of 1976.
- The Constitution of the Republic of Namibia of 1990.
- Nature Conservation General Amendment Act 1990.
- Foreign Investment Act No. 27 of 1990.
- The Regional Councils Act No. 22 of 1992.
- Nature Conservation Amendment Act 5.
- Namibian Water Corporation Act, No. 12 of 1997.
- Road Traffic and Transport Act, 1999 (No. 22 of 1999).
- Pollution Control and Waste Management Bill (3rd Draft September 2003).
- Labour Act, 2007 (No. 11 of 2007).
- Environmental Management, Act 7 of 2007.
- Regulations promulgated in terms of the Environmental Management, Act 7 of 2007.
- Water Resources Management Act 11 of 2013.
- Public and Environmental Health Act No. 1 of 2015.
- Nature Conservation Amendment Act 3.

3.4 Applicable Listed activities

The EIA Regulations promulgated in terms of the Environmental Management Act identify certain activities which could have a substantially detrimental effect on the environment. These listed activities require environmental clearance from MEFT prior to commencing. The following activities identified in the regulations apply to the Project:

Table 2: Listed activities triggered by the proposed Project

LISTED ACTIVITY
9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substance Ordinance, 1974.

4 ROLES AND RESPONSIBILITIES

4.1 Supervisor

The Supervisor will be a competent person appointed to implement the on-site environmental and social management of this EMP. The Supervisor shall be on site daily and the duties will include the following:

- Regular inspections of compliance to this EMP and any other relevant legal requirements.
- Regular correspondence with the DEA on environmental issues and incidents.
- Conduct environmental awareness training during induction training and on an ad hoc basis thereafter to all workers.
- Ensure compliance to all park rules
- Ensure that staff is controlled through the implementation of appropriate security measures.
- Carefully manage the handling of hydrocarbons and other hazardous materials.
- Monitor for excessive dust and noise levels and implement control measures if necessary.
- Report incidences to the DEA.
- Implement a waste management strategy.
- Monitoring and maintenance of equipment and machinery.
- Implement an environmental awareness plan.
- Implementation of first-aid procedures.

5 TRAINING AND AWARENESS

The purpose of the job specific environmental awareness training is to ensure that employees/all staff are equipped to implement the actions committed to in the EMP. The staff involved in operations will receive training regarding the requirements of this EMP.

Four main forms of training will be provided on the premises:

- Site induction
- Environmental management training – general and targeted

The training will generally be prepared by the Supervisor (or the Environmental Representative).

The following will be done to ensure all employees, contractors, suppliers and visitors receive the appropriate training/awareness:

5.1 Environmental Site Induction

All new members of staff receive a corporate Environmental Induction along with the obligatory Health & Safety induction. The induction gives a general overview of the environmental challenges faced by the project, how we are managing them, and general tips for reducing our impact in the workplace.

The main reason for environmental induction is to encourage new staff to be environmentally aware right from the beginning of their employment. This will ensure that environmental initiatives are successful by eliminating bad habits from the start.

Before working at the facility, all personnel and sub-contractors will undertake a Park induction incorporating environmental requirements. The induction will address a range of environmental awareness issues specific to the construction process of the project.

As a minimum, training shall include:

- Explanation on the importance of complying with the EMP and environmental implications should the EMP not be effectively implemented.
- Explanation of the facility rules.
- Discussion of the potential environmental impacts of activities, recognition of environmental risks and how to control these risks.
- The benefits of improved personal performance, understanding of what to do in case of an environmental event or exposure.
- Employees' roles and responsibilities, including emergency preparedness.
- Explanation of the mitigation measures that must be implemented when carrying out operational activities.
- Explanation of the requirements of the EMP and its specification.
- Explanation of the management structure of individuals responsible for matters pertaining to the EMP.

5.2 Environmental Awareness training

Targeted environmental management training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact. This environmental training will aim to achieve a level of awareness and competence

appropriate to their assigned activities. This training will take place at the beginning of operations.

6 Toolbox talks

'Toolbox' talks will assist in communicating relevant information to the workforce and providing feedback on issues of interest or concern. Toolbox talks shall be held on a weekly basis. Environmental topics shall (as far as possible) be sent out to all employees to be discussed at the toolbox talks.

Environmental work procedures detail the required subjects to be addressed in 'toolbox' talks topics may also include:

- The efficient use of materials.
- Waste management, minimisation and recycling.
- Management of hazardous materials.
- Management of pollution.
- Work methods.

Records of toolbox talk topics and persons attending will be retained on site in a register.

7 ENVIRONMENTAL MONITORING AND AUDITING

Auditing should be conducted bi-annually (every 6 months) by an Independent Environmental Consultant. Benefits derived from the audit process may include:

- Identification of environmental risk.
- Development or improvement of the environmental management system.
- Avoidance of financial loss.
- Avoidance of legal sanctions.
- Increase in staff awareness.
- Identify potential cost savings.
- Improve dealings with employees, environmental groups, the community, regulators, media, shareholders, or insurance & finance institutions.
- Establish a history of environmentally responsible operational activities, e.g., through environmental incident reports, environmental monitoring and recording, and reporting to committees or authorities.

- Commonly, the audit of a site will cover all management procedures, operational activities and systems, and environmental issues. The environmental audit will be compiled objectively and conducted by an independent entity.

8 PUBLIC PARTICIPATION

An ongoing process of public participation shall be maintained during operations to ensure the continued involvement of interested and affected parties (I&APs) in a meaningful way. The issues that may arise from the public shall be recorded and presented to the environmental consultant during the bi-annual compliance auditing.

9 ENVIRONMENTAL ACTION PLANS

The management measures proposed to mitigate the potential impacts relating to the operation phase are detailed in the action plans below.

9.1 Action plans to achieve objectives and goals

Action plans to achieve relevant objectives/goals are listed in tabular format together with timeframes for each action. The action plans include the timeframes and frequency for implementing the mitigation measures as well as identifying the responsible party.

Table 3: Action Plan – Communication and Stakeholder Consultation

Objective:

To ensure that all stakeholders are adequately informed throughout operations and that there is effective communication.

Management and mitigation measures	Action plan	
	Frequency / target date	**Responsible parties**
• BMB shall take responsibility for the implementation for all provisions of this EMP and to liaise between community (neighbours). • Initiate an efficient Grievance Mechanism to allow potentially affected individuals to voice their concerns on the project.	(On- going)	BMB

Table 4: Action Plan - Labor Rights

Objective:

To ensure labour standards are complied with.

Management and mitigation measures	Action plan	
	Frequency / target date	**Responsible parties**
• Ensure that workers have access to and are aware about the Grievance Mechanism. • Ensure minimum legal labor standards as per ILO regulations (child/forced labor, no discrimination, working hours, minimum wages) are met. • BMB should comply with relevant labor Laws as stipulated by the Labor act. • Ensure all workers implement code of conduct concerning employment and workforce behavior (including but not limited to	(On- going)	BMB

Management and mitigation measures	Action plan	
safety rules, zero tolerance for substance abuse, environmental sensitivity of the area, dangers of sexually transmissible diseases and HIV/AIDS, gender equality and sexual harassment, respect for the beliefs and customs of the populations and community relations in general.) • In case of security personnel at the site, ensure proper training and in the use of force and appropriate conduct toward workers.		

Table 5: **Action Plan – Health and Safety**

Objective: To ensure health and safety of workers and the public at all times during operations

Management and mitigation measures	Action plan	
	Frequency / target date	**Responsible parties**
• BMB shall prepare a strategy to ensure the least possible disruption to traffic at the intersection to the B2 road and potential safety hazards during operations. • Proper traffic and safety warning signs must be placed at the facility. • The Contractor and workers must adhere to the regulations pertaining to Healthy and Safety, including the provision of personal protective clothing (PPE). • Dust protection masks shall be provided where required. • The contractor must enforce relevant Health and safety Regulations for these specific activities. • Ensure speed limits at the facility and on transporting routes. • Ensure vehicles and equipment are switched off when not in use. • Use protective hearing equipment for workers conducting noisy activities. • Maintain high standard in housekeeping on site. • Provide necessary fire prevention equipment on site in line with applicable regulations. • Implement incident report access to incidents occurring at the	On- going	BMB and Supervisor

Management and mitigation measures	Action plan	
facility as soon as possible and not later than 24 hours after the incident occurred (including short-and long-term response measures). A major incident is a e.g., fatality, injury, major oil spill, social unrest, outbreak of violence, labour strikes etc. • Training provided for workers • Safe delivery areas and equipment for offloading and loading bags • "Firewatch" staff will be identified and trained. • Local induction and emergency training • Emergency procedures should be in place • Spill kits should be available at all times • First aid kits and trained first aiders/safety representatives should be available at all times.		

Table 6: Action Plan – Soils, Hydrocarbon and Associated Spills Management

Objective:

The objective of the mitigation measures is to handle and store hydrocarbons in such a way as to prevent spills. Where spills do occur, to ensure the spill is contained and the contamination , cleaned up and contaminated material disposed off responsibly

Activities / facilities	Management and mitigation measures	Action plan	
		Frequency / target date	Responsible parties
Machinery, Trucks and equipment	• Establish and maintain impermeable bunded / drip trays around machinery, generators and equipment. • Machinery and equipment shall be kept in good working condition to ensure they do not leak oil/diesel. • In the event where machinery needs to be repaired/serviced on site, all care shall be taken to prevent spillage of oil/diesel by performing the work on impermeable surfaces or proper placement of drip trays. • All used parts machinery (which may include, but not limited to, oil filter, pipes, rags, cans) will be	Throughout the operations	BMB and Supervisor

	collected and removed from site and disposed of in an appropriate manner. • Regular environmental awareness should include potential risks associated with hydrocarbons.		
Storage of hydrocarbons	• The hyrocarbons shall only be stored in original containers being undamaged and sealed. • Damaged containers, etc. of hydrocarbons shall be sealed/repaired immediately with appropriate material. • Broken/damaged bags of briquettes must be correctly handled & repaired to avoid contamination of the road and other third parties' facilities when transported	Throughout the operations	BMB and Supervisor
General (spills)	• Any spills will be contained and cleaned up immediately. • Spill kits will be readily available on site. Employees and/or contractors will be shown how to use the spill kits to enable containment and remediation of pollution incidents. • BMB will establish environmental awareness to employees.	Throughout the operations	BMB and Supervisor

Table 7: Action Plan – Waste management

Objective:

The objective of the management measures is to ensure proper storage, removal, transportation and disposal/recycling of hazardous and non-hazardous (i.e. domestic) waste.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
General	• Waste shall be separated and recycled / re-used where possible.	Throughout operation	Supervisor
	• No burning of waste material will be allowed on site.	Throughout operations	Supervisor
	• Contractors and workers will be shown the importance of correct waste disposal as well as waste minimisation and recycling.	Throughout operations	Supervisor

Collection and storage of waste	• Suitable receptacles with lids for waste disposal will be required on site. • Ensure animals do not have access to waste bins. All food scraps need to be removed from the site on a daily basis. • If rubbish containers are used, ensure these can be sealed from strong wind and sealed during transport.	Throughout operations	Supervisor
Disposal of non-hazardous (domestic) waste	• Waste shall be transported to the Karibib Landfill site on a weekly basis. No disposal of waste on site and no burning of waste.	Throughout operations	BMB and Supervisor
Disposal Hazardous Waste	• Hazardous Waste and hydrocarbon contaminated material/soil will be disposed of off at the Walvis Bay or Kupferberg Hazardous Waste Disposal Facility.	Throughout operations	BMB and Supervisor
Disposal records (domestic and industrial)	• Written evidence of safe disposal of waste will be kept.	Throughout operations	BMB and Supervisor

Table 8: Action Plan - Visual Impacts

Objective:

The objective of the mitigation measures is to avoid (as far as possible) visual impacts to travellers and nearby communities.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
The Briquettes Production Facility	Ensure that the operations and facilities are well maintained and kept in good order.	Throughout the operations	BMB and Supervisor

Table 9: **Action Plan –Noise and Dust Pollution**

Objective:

The objective of the mitigation measures is to prevent negative noise and dust pollution impacts emitted from the project.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible

			parties
Noise Generated	• The machinery operations is limited to day-time only and no machinery operations should be allowed during the night.	Throughout the operations	BMB and Supervisor
Dust Generation	• Dust suppression methods such as water spraying, should be implemented when required and doing times of truck and vehicle movement. • Implementation of dust buckets to monitor dust over a period and sent to laboratories for analysis. Should dust levels be excessive, an air quality specialist should be appointed to undertake an air quality investigation.	Throughout the operations	BMB and Supervisor

Table 10: **Action Plan – Social Issues & Training**

Objective:

The objective of the mitigation measures is to prevent negative social impacts associated with the workforce.

Activities / facilities	**Technical and management options**	**Action plan**	
		Frequency / target date	**Responsible parties**
Employees - social issues	• Have zero tolerance to alcohol in the workplace. • A First Aid Kit should be available at all times.	Throughout the operations	BMB and Supervisor
Training & Awareness	All individuals who work on site are aware of the contents of the EMP.	Throughout the operations	BMB and Supervisor
Social and Community Health	Emissions from the operations could result in the contamination of the neighboring farm, thereby impacting their health. The management and mitigation measures in the preceding sections of this report will be implemented in order to manage this risk.	Throughout the operations	BMB and Supervisor

Table 11: **Action Plan – Economic, Job Creation and Skills Development**

Objective:

The objective of the mitigation measures is to enhance positive economic impacts.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Recruitment	• Have approachable person as she/he will be a key link between the community in the area and the project. • Demonstrate its efforts to recruit employees from Karibib and Erongo Region. • Be gender sensitive and select women for interview, training and recruitment.	Throughout the operations	BMB and Supervisor

Table 12: **Action Plan – Groundwater and surface water contamination**

Objective:

The objective of the mitigation measures is to prevent negative impacts associated with groundwater and surface water pollution.

Activities / facilities	Technical and management options	Action plan	
		Frequency / target date	Responsible parties
Ablution Facilities	• Employees must be provided with appropriate ablution facilities • BMB should ensure that toilets are working properly and are clean, so they do not pollute the surrounding environment or create hygiene problems. • All sewerage from the toilets should be in good working order. • Workers may not relieve themselves in the surrounding bush	Throughout the operations	BMB and Supervisor
Contamination of groundwater/ surface water	• Refer to “Hydrocarbon and associated spills Management Action plan”. • Stormwater management designs should be included in the design to prevent pooling of water on site	Throughout the operations	BMB and Supervisor