UPDATED ENVIRONMENTAL MANAGEMENT PLAN

FOR EXCLUSIVE PROSPECTIVE LICENSEs (EPLs) 6561 & 5992

OTJOZONDJUPA REGION

July 2025

Prepared by:

Rose Mtuleni

Prepared for:

Philco One Hundred and Ninety-Three (Pty) Ltd

Table of Contents

List of Figures

List of Tables

1. Project Overview

The Proponent, Philco One Hundred and Ninety Three (Philco 193) is the holder of mineral rights of Exculsive Prospecting Licenses (EPLs) 5992 and 6561. The mineral rights of EPLs 5992 and 6561 were initially granted to Kunene Resources Namibia (Pty) Ltd (KRN) by the Ministry of Industries Mines and Energy on 13 October 2016 and 29 November 2017, respectively. The mineral rights were transferred to the current holder, Philco 193, from KRN during the year 2021. Exploration activities on EPLs 5992 and 6561 are focused on precious and base metal mineralization.

The proponent (Philco 193) plans to continue with prospecting and exploration activities on the EPLs. The EPLs are located within commercial farming areas near the town of Grootfontein (Figure 1). The proponent appointed Rose Mtuleni, an Environmental Manager from Gecko Exploration, to conduct the Environmental Clearance Certificate (ECC) renewal application for EPLs 5992 and 6561. The ECC application process for the two EPLs was initially handled by Philip Hooks in 2021, an Independent Environmental Assessment Practitioner (EAP).

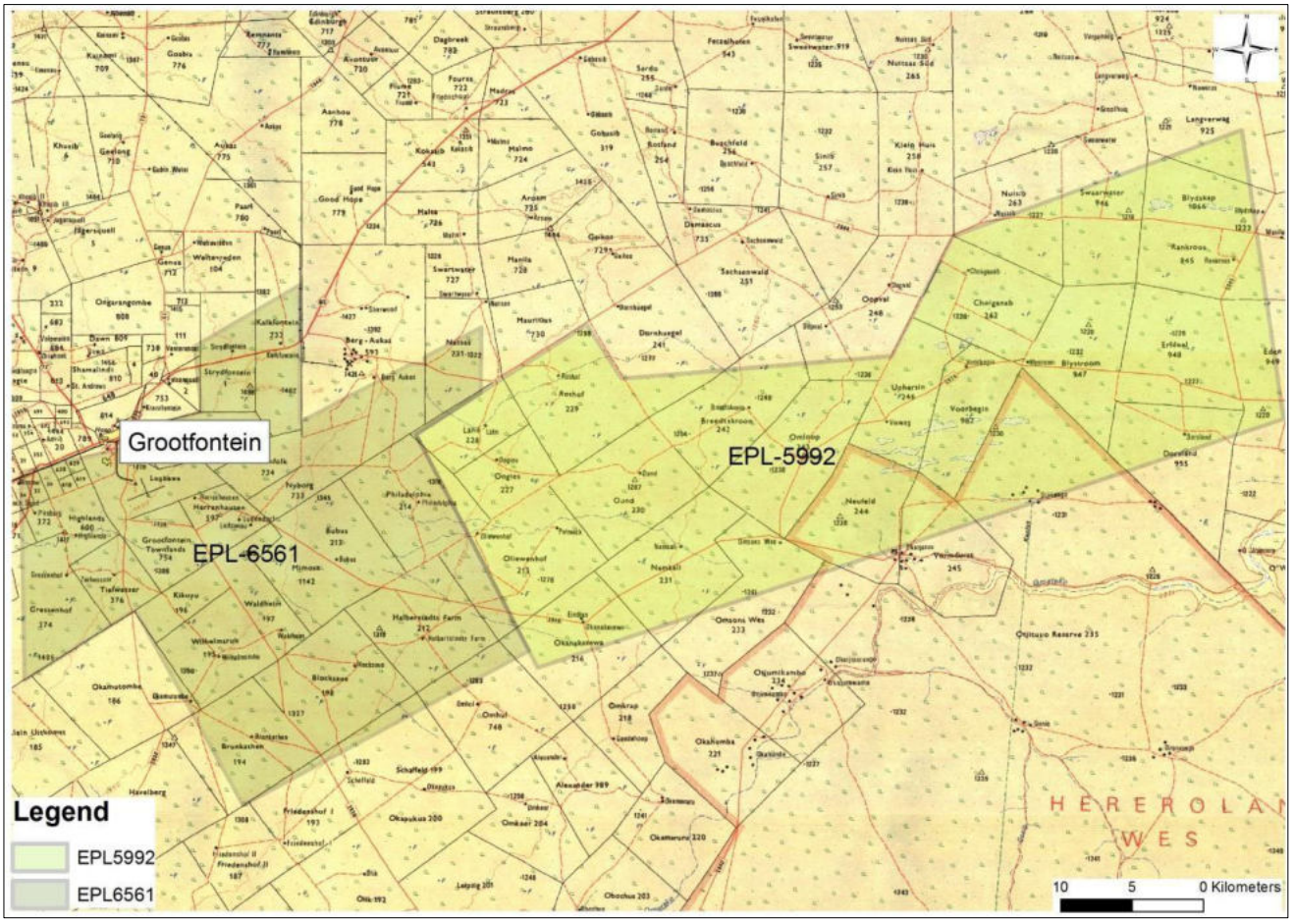

Figure 1: Locality map for EPLs 5992 and 6561

1.1 Exploration Activities on EPLs 5992 and 6561

As from 2019, exploration activities at the project focused on the potential orogenic gold mineralization and various types of base metal mineralization's within the Paleoproterozoic Grootfontein Mafic Complex (GMC). The exploration progamme planned for the two EPLs includes exploration drilling, ground geophysical surveys, and helicopter-borne electromagnetic (heli-EM) and magnetic geophysical surveys.

EPL 5992: Due to the lack of rock outcrops and thick soil and calcrete cover, a regional soil program over local key target areas, followed by ultra-high-resolution UAV-borne magnetic and ground IP surveys were conducted. Three exploration targets were followed by an RC drilling program in 2021 totaling 2,931 m. The drilling program did not yield economic grades of gold or other metals. Therefore, it was realized that further exploration will need a regional scale electromagnetic (EM) survey flown by helicopter for ultra-high-resolution data.

EPL 6561: Two possible gold targets associated with key structures of the Damara Orogenic Belt were identified on the EPL from the interpretation of geophysical and geochemical data. Due to the lack of surface rock outcrops and thick soil and calcrete cover over the EPL, the company conducted various studies with the aim to identify possible blind ore bodies. A Reverse Circulation (RC) drilling programme was conducted in 2021, where a total of 1,535 meters were drilled on the EPL. Ground Time Domain Induced Polarization (TDIP), and Natural Source Audio-Magneto-Tellurics (NSAMT) surveys were conducted over the two targets to establish disseminated sulphides associated to orogenic gold mineralization for drilling purposes.

A contractor contracted to conduct the heli-EM survey on the two EPLs attempted twice (including in early 2024) to obtain the necessary flight permits. The permit applications were rejected by the Ministry of Defence and Veteran Affairs due to a conflicting military flight zone. A second geophysical service provider was contracted in 2024 for a similar heli-EM survey. They received the flight permission from the Ministry of Defence in December 2024 but were unable to fly the survey in the current license period due to unfavourable weather in January-March 2025.

Due to the delay of the heli-EM survey, the company focused exploration on smaller geophysical targets. A soil sampling program was conducted on the south-eastern portion of EPL 5992, following up a structurally controlled uranium anomaly. An ultra-high-resolution drone survey was flown by Flightec over the anomaly in early 2025 followed up by a ground EM survey in Quarter 2 (Q2) of 2025. Processing of the EM survey data is ongoing to delineate drill targets on the EPLs.The heli-EM survey is now planned for September 2025 after retreat of the massive water ponds which would mask the EM signal from depth.

2. EMP Objectives

The main purpose of the Environmental Management Plan ("EMP") is to provide a strategy for the identified socio-economic and biophysical impacts to provide measures that mitigate, as far as

practicably possible, the effects of significant adverse impacts while providing strategies for maintaining or enhancing positive impact effects.

This Environmental Management Plan (EMP) has been drafted as part of the Environmental Impact Assessment (EIA), which was conducted for the exploration of Precious Metals, Base and Rare Metals, Dimension Stone, as well as Industrial Minerals on EPLs 6561 & 5992, as held by Philco One Hundred and Ninety Three (Pty) Ltd. The content has been designed according to the Regulations of the Environmental Management Act, 2007 (Act No 7 of 2007). The aim thereof is to provide management measures to address the effects on the environment that have been identified in the report and to effect the recommendations. To achieve this goal, it is essential that all personnel involved on site are fully aware of the environmental issues and the means to avoid or minimize the potential impacts of activities on site.

The company (Philco 193) is aware and fully understands the legal and policy requirements as manager and operator of the EPLs, and towards its employees and contractors, and they will be strictly enforced. Issues and concerns identified in the EIA form the set of environmental specifications to be implemented on site.

2.1 Environmental Management Principles

Philco 193 will ensure that all parties involved in the project maintain the following broad aims:

1) All persons will be required to conduct all their activities in a manner that is environmentally and socially friendly. This includes all consultants, contractors, and sub-contractors, transport drivers, guests and anyone entering the EPL areas in connection with the project.

2) Health, Safety and Social Well Being
    - Safeguard the health and safety of project personnel and the public against potential impacts of the project. This includes issues of road safety, precautions against natural dangers on site, and radiation hazards; and,
    - Promote good relationships with Grootfontein settlement, farmers and other stakeholders.

3) Biophysical Environment
    - Wise use and conservation of environmental resources, giving due consideration to the use of resources by present and future generations;
    - Prevent or minimise environmental impacts;
    - Prevent air, water, and soil pollution; and
    - Biodiversity conservation.

To attain these aims, the following principles need to be upheld:

a) Commitment and Accountability	Company senior executives and line managers will be held responsible and accountable for: ➢ Health and safety of site personnel while on duty, including while travelling to and from site in company vehicles: and, ➢ Environmental impacts caused by exploration activities or by personnel engaged in the exploration activities.
b) Competence	The company will ensure a competent workforce through appropriate selection, training, and awareness in all safety, health and environmental matters.
c) Risk Assessment, Prevention and Control	Identify, assess and prioritise potential environmental risks. Prevent or minimize priority risks through careful planning and design, allocation of financial resources, management and workplace procedures. Intervene promptly in the event of adverse impacts arising.
d) Performance and Evaluation	Set appropriate objectives and performance indicators. Comply with all laws, regulations, policies and the environmental specifications. Implement regular monitoring and reporting of compliance with these requirements.
e) Stakeholder Consultation	Create and maintain opportunities for constructive consultations with employees, authorities, other interested or affected parties. Seek to achieve open exchange of information

	and mutual understanding in matters of common concern.
f) Continual Improvement	Through continual evaluation, feedbacks, and innovation, seek to improve performance with regard to social health and well-being and environmental management throughout the lifespan of the project.
g) *Financial Provisions for Exploration*	In line with the internationally recognised "polluter pays principle" the company will make the necessary financial provision for compliance with the EMP.

3. Roles and Responsibilities for Environmental Management

3.1 Communication between Parties

The importance of open communication between all parties is emphasised, as the attainment of environmental quality requires a joint effort. Only with open communication can a proactive approach be reached. This approach should guarantee that environmental impacts are anticipated and prevented, or minimised, rather than adopting a negative "policing" approach after negative impacts have already occurred.

The importance of a proactive approach cannot be overemphasised, particularly in relation to preventing unnecessary tracks, and damage to vegetation (i.e protected and endemic species) as these impacts cannot easily be remedied.

3.2 The Exploration Company

Philco 193 carries the ultimate responsibility for all stages of the project and the resulting environmental impacts. The main responsible parties are the company's Managing Director and Environmental Control Officer. They will ensure that:

- The EMP and its environmental specifications are included in contract documents and that the contractor, and all his subcontractors, consultants etc. can meet the EMP requirements;
- The company and all its subcontractors, consultants etc. comply with all Namibian legislation and policies and any relevant International Conventions;
- Compliance with the environmental specifications are enforced on a day-to-day basis;
- Environmental audits are conducted periodically by a suitably qualified ECO to confirm that the environmental requirements are properly understood and effectively implemented;
- Sufficient budget is provided for the contractor to implement those measures that

have cost implications;
- The Site Manager must commission tree surveys well in advance of planned road construction or drill pad preparation so that the necessary sit visits by forestry personnel and forestry permits are acquired; and,
- Open and effective communication is maintained between all parties who influence environmental management on the project.

3.3 Site Manager

The Company will assign the day-to-day responsibility for environmental management to the ECO and Manager of Field Operations (MFO) for the duration of all exploration activities. These will:

- Be familiar with the contents of the EMP and applicable sections of the EIA which provide the reasons for the measures recommended therein;
- Monitor compliance with the environmental specifications on a daily basis and enforce the environmental specifications on site;
- Communicate the ECO's advice to all personnel;
- In the event of any infringements leading to environmental damage, they will consult with the ECO and seek advice on any remedial measures to employ to limit or rectify the damage;
- Maintain a record (photographic and written) of "before-and-after" conditions on site;
- Facilitate communication between all role players in the interests of effective environmental management; and,
- Plan and mark out new access routes in advance and arrange for surveys by a suitably qualified botanist as necessary, so that forest permits can be applied for.

3.4 Environmental Control Officer (ECO)

Philco 193 must assign a suitably qualified ECO who is responsible to:

- Undertake environmental audits of overall compliance with the environmental specifications. This should be done at least twice per year for the exploration area,
- Submit a site inspection report to the Managing Director and MFO,
- Advise the MFO on interpretation and implementation of the environmental specifications as required,
- Make recommendations for remedial action in cases of non-compliance with the environmental specifications, and
- Prepare bi-annual reports for submission to MEFT.

3.5 Drilling / Exploration Contractors

The Drilling / Exploration Contractors will have the responsibility to:

- Familiarize themselves with the requirements of the EMP;
- Comply with the environmental specifications enclosed in this EMP;
- Notify the ECO through the MFO timeously in advance of any actions he has reason to believe will have significant negative impacts, so that mitigatory measures can be discussed and implemented before negative impacts arise;
- Conduct or arrange for environmental training amongst his employees and sub-contractors so that they are fully aware of the environmental specifications and the reasons for them, and are competent to comply; and,
- Undertake rehabilitation measures where required by the MFO. As far as possible, rehabilitation measures will be carried out progressively and not left till the end of the project.

4. EMP Implementation Guidelines

The potential impacts resulting from the proposed operations were evaluated in the scoping report with assessment. The suggested mitigations for potentially negative impacts if implemented, will reduce the impacts on the biophysical and socio-economic environment so that their significance is negligible. Mitigation measures are included in the EMP implementation guidelines below. The tables in this section describe the management programmes for the main potential impacts to mitigate and/or enhance the potentially significant environmental and socio-economic impacts.

This document may need to be periodically reviewed and updated due to new insights or operational changes to ensure that all the environmental impact aspects are included.

The following management programmes are discussed in detail in the tables that follow:

- Air quality Management Programme
- Noise Management Programme
- Health & safety Management Programme
- Stakeholder Communication Management Programme
- Waste Management Programme
- Ecological Management Programme
- Water Resource Management Programme
- Traffic Management Programme
- Archaeological and Heritage Management Programme
- Decommissioning and Rehabilitation Management Programme

Table 1: Air Quality Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Disturbances to soil and	Dust suppression techniques must be	Site manager /	Equipment (incl.

rock during exploration activities resulting in excessive dust in the atmosphere	used in cases of excessive dust during exploration activities such as drilling. The following can be done to reduce exposure of the environment and personnel to excessive dust: - Avoid dust generating activities that create excessive dust during windy conditions. - Personnel are required to wear PPE (dust masks) if excessive dust should be created. - Water spays if necessary at the various drilling sites and road (only if water sources are sustainably used) - To mitigate gaseous pollutants released from the combustion of hydrocarbons, use of high-quality fuels will ensure quantities released per unit weight of product are at levels within environmental limits. - To minimise health hazards and dust impacts on vegetation, rock flour must be disposed of down the drill holes as soon as possible after samples are taken or put into bags and removed from site.	MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	PPE) and Tools
Monitoring	- A register of complaints and grievances must be kept recording any incidents due to excessive dust. - Ensure air quality management is included in safety induction for all workers. - Provision of dust masks for workers exposed to dust and ensuring adequate supply.	Site manager / ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	

Table 2: Noise Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Disturbance of sense of place and the effect on tranquil ambient noise levels	- There are industrial standards to which the noise sources (i.e. machinery) must comply. Regular maintenance of machinery should ensure the acceptable noise levels for operators working with the machines. - It is recommended that any complaints regarding noise be	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Equipment (incl. PPE) and Tools

	recorded and included in the environmental reports. - Transportation routes should be planned for heavy vehicles such that they pass noise sensitive receivers at appropriate times, e.g. a restriction of the hours of movement, and frequency of movement can also be planned to fall within a limited period.		
Monitoring	- Keep a register of all complaints received and remediation action taken. - Record all noise related information in a biannual report	Site manager / ECO	

Table 3: Health and Safety management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Injury risks due to working conditions	- Limiting the amount of time, workers spend at a noise source. - Providing quiet areas where workers can gain relief from noise sources. - Where possible, restricting worker presence to a suitable distance away from noisy equipment. - Use of ear plugs for all excessive noise-producing operations - Meet industry vibration regulations; set daily exposure limit values and action values for both hand-arm and whole-body vibration for eight-hour shifts. Personnel can work shorter shifts where excessive vibration conditions exist. - Provide health and safety awareness training - Establish practical standard housekeeping rules - Colour code certain areas, equipment and substances to thereby classifying the risks. - Provide signage for personal protective equipment (e.g. protective clothing like safety boots and hard hats) - Institute safe working procedures	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Emergency Response Plan. First Aid kits and first aid trained personnel

	- Devise and implement emergency response plans - Close coordination with the traffic authorities to ensure road safety signs are strategically placed and ensure all employee drivers are well trained - Provide easy access to Material Safety Data Sheets (MSDS) - Provide first aid treatment and training - Devise emergency medical procedures for all eventualities - Undertake daily safety reminders and/or drills - Establish regulations for handling fuel - The MSDS gives health related medical responses for personnel assisting staff who are exposed to the products, i.e. fuels, chemicals, etc. - Procedures for dealing with injuries or accidents must be in place and all contact details for emergency personnel must be available. - Fuel storage facility erected on site shall comply with specification for storage and handling of petroleum Products. This list is not comprehensive and could be supplemented substantially by the Health & Safety Manager		
Monitoring	- Record all health-related incidents - A register of all incidents must be maintained, and include measures taken to ensure that incidents do not repeat themselves. - Monitoring reports on file - Non-compliances reported and on file - Machinery and equipment operator certificates on file - Schedule and reports of road maintenance on file - A register must be maintained of all training provided to staff. - A register must be maintained for all safety equipment and medical supplies kept on site. This should include date of purchase and date of service/replacement for items that can expire or deteriorate with age.	Site manager / ECO	

	- Record all health and safety information in biannual reports		

Table 4: Stakeholder Communication Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Land use and socio-economic impacts of the exploration activities	- All site personnel will maintain good relations with farm owners and their staff, and members of the public. Any complaints received by the ECO will be addressed and the guilty persons will face possible suspension from the project. - Access to water on the farms or from the national distributor must be arranged prior to use - Keep engagement and complaints register up to date - Engage land users regularly to maintain open channels of communication - Drillers or geologists camps within farms or on municipal land must be prearranged in writing. The conditions of land use must be stipulated in the agreement between the parties - Ensure there are access agreements in place before exploration works commence on site - Where possible and as necessary, personnel should be hired from the local resident pool. At least this should apply to the unskilled vacancies - Awareness of proximity to any tourist attractions or farm homesteads, camps, watering points or kraals - Minimize visual blemish - Kindliness of the workers - Avoid conflict with tourism sector	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Stakeholder engagement records Stakeholder register/database Complaints register Access agreements Funds to conduct a cleaning up program in the area (rehabilitation)
Monitoring	- Keep a register of all complaints received and remediation action taken. - Correspondence and agreements - document filing system	Site manager / ECO Affected farm owners	

	- Review memoranda of understanding as necessary - Update stakeholder register regularly - Record all stakeholder/farm owner related information in a biannual report - Periodic inspections by ECO - Ongoing consultation with landowners		

Table 5: Waste Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Production of waste	- The entire EPLs area will be kept clean, neat and tidy to the satisfaction of the MFO and ECO, as well as farm owners. - The contractor will provide bins at the work sites and will be responsible for the collection and containment of daily refuse and waste generated by staff. - Bins will be secured in such a way that wind cannot remove light garbage such as papers and plastics. - Bins will also be secured against animals around the vicinity. - No waste will be buried or burned on site. - All waste will regularly be removed to an approved waste disposal facility e.g. in Grootfontein dumping site/ landfill. - All containers of fuel, oil and any other hazardous substances are to be kept sealed and clearly labelled for identification. - Tanks for fuels, oils and any other hazardous substances must be bunded in an adequate manner to contain any possible spills - Oil spill kits are to be kept at all times at operations on site. - All fuel must be stored securely and disposed of at a waste management facility that accepts fuel waste. - Portable latrines will be placed near	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Equipment (incl. PPE) and Tools Emergency Response Plan Waste Containers Spill kits Funds to conduct a cleaning up program in the area (rehabilitation)

	operational and drill sites and serviced regularly by the supplier - Removal of litter - Careful use and storage of chemicals - Oil adsorbing materials available at site and all vehicles at all times		
Monitoring	- Keep a register of all complaints received and remediation action taken. - Regular inspection of waste collection and disposal areas. - Check and file waste disposal slips. - Compile all monitoring information. - Emergency Response Plan on file.	Site manager / ECO	

Table 6: Ecological Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Exploration activities may affect biodiversity of fauna and flora directly or through habitat alteration.	- Keep the overall footprint of exploration activities as small as possible. - The targets for any invasive exploration activities must be planned to minimise fragmentation or disturbance of habitats. - Anti-erosion measures must be taken where necessary. - Limit exploration activities to daytime hours to reduce noise. - Educate and provide awareness to workers on their environmental obligations. All contractors should be held responsible for transgressions and significant penalties should be levied in order to ensure compliance. - Any nests, dens and other breeding locations identified on the sites must be avoided and excluded from exploration targets. - No collection of plants should be allowed. - No fires allowed on site. - No firewood will be collected on the farms or municipal land without permission from the land owners and without the necessary forestry permits	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Equipment (incl. PPE) and Tools Emergency Response Plan Waste Containers Spill kits ECC Permits for bush clearing for roads and drill pads.

	- Birds' nest sites may not be disturbed unnecessarily. Shooting or trapping birds is prohibited - No animal or bird will be captured, killed or harmed in any way. Anyone caught infringing in this regard will face suspension from the project and could be liable for prosecution. In like manner domestic livestock on farms may also not be harmed - Rehabilitation and restoration of drilling sites should be implemented during operations, as soon as the site is no longer in use or anticipated for future use. - To minimise health hazards and dust impacts on vegetation, rock flour must be disposed of down the drill holes as soon as possible after samples are taken, or put into bags and removed from site. - Damage to all plant species will be avoided wherever possible. All plants are of high conservation importance and will be avoided. - Sensitive areas and access routes must be avoided or excluded. Drill pads might have to shift by a few metres and the adjacent sensitive plant population barricaded for the duration of the drilling programme to prevent accidental damage - No exploration activities may occur outside the boundaries of the EPLs. - No off-road driving should be allowed. - Staff and contractors should be trained in sensitive human-wildlife interaction - Where possible no destruction of plants - Avoid highly sensitive environments or minimise footprint in high priority areas - Keep to existing tracks (vehicular, animal) - All waste and scrap to be removed - Rehabilitate sites by gently raking disturbed soil substrate where - necessary.		

	- Removal of infrastructure, machinery and equipment from the site once the exploration activities are concluded. - Reasonable and acceptable ways of rehabilitation should be implemented on an ongoing basis as well as at the time of decommissioning of exploration activities. - Where the ground has been affected by spillages such as hydrocarbons, these soils should be stockpiled and appropriately treated to regulate the contamination levels prior to being used for rehabilitation purposes. - The MFO will have the right to order work to stop in the event of environmental specification infringements which could result in damage to soil, plants or animals. Work will continue once the situation is rectified and brought to a state of compliance. In the event of such work stoppage, the Contractor will not be entitled to claim for delays.		
Monitoring	- Keep a register of all complaints received and remediation action taken. - Environmental Clearance Certificate is on file - Compile all monitoring information. - Emergency Response Plan on file. - Awareness training regarding the sensitive nature of the project area must be provided to all staff. - Photograph before and after exploration activities. - Acquire the necessary permits to operate, clear vegetation, abstract groundwater, transport and dispose of waste	Site manager / ECO	

Table 7: Water Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Exploration	- Ensure sufficient supply of water for	Site manager /	Abstraction permits if

activities may affect water resources through overutilisation / over abstraction or contamination	operations and domestic use on the site. - Minimize use and loss - Check container piping and taps regularly for leakage - Ensure strict measures to handle fuel and chemicals to avoid spills. - Use water sparingly on the site, and recycle water uses as and when necessary	MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	necessary Emergency Response Plan Waste Containers Spill kits
Monitoring	- Keep a register of all complaints received and remediation action taken. - Regular inspection of water sources such as containers, pipes and tanks. - Compile all monitoring information. - Emergency Response Plan on file.	Site manager / ECO	

Table 8: Traffic Management Plan

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Increase in traffic in the area during exploration activities	- Provide road safety awareness training - Establish specific rules for driving including travelling speed and rest times - All site personnel and transport drivers will receive the training equipping them with the necessary knowledge to comply with the environmental specifications - No new tracks will be made unless necessary - A single track only will be used to and from each destination - Recreational driving by exploration personnel is not permitted within the EPLs - Devise and implement emergency response plans - Establish regulations for handling fuel - Provide easy access to Material Safety Data Sheets (MSDS) for drivers - All gates are to be closed or locked	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Emergency Response Plan MSDS Spill kits Driving and operator licenses

	after passing though farms or farm camps. All users of traffic must take precautions to avoid traffic hazards. Precautions include but are not limited to: - Reducing speed considerably when visibility is poor. - Complying with speed limits. - Being wary of all other vehicles – mindful of pedestrians. - Slowing down for animals and birds on the road; and, - Being courteous to other road users		
Monitoring	- All traffic-related incidents/accidents must be recorded - A complaints register should be opened and maintained. - All necessary permits should be on file and maintained in accordance with the required renewal periods.	Site manager / ECO	

Table 9: Archaeology and Heritage Management Programme

Impact	Mitigation Measures	Responsible Party	Implementation Resources
Possibility of finding / discovering archaeological artefacts and heritage sites during exploration	- In the case of any archaeological chance finds, the ECO will be notified without delay of any finds, and the Archaeological Chance Finds Procedures outlined in **Appendix 1** must be followed.	Site manager / MFO, ECO/HSE (Health Safety Environment) Officer, team leaders, all workers	Emergency Response Plan MSDS NHC Contact details
Monitoring	- Should heritage finds be discovered during exploration works then work should stop and the police should be informed. A member of the heritage council would need to assess the importance of the find and provide the necessary permission to continue with works at that specific site.	Site manager / ECO National Heritage Council (NHC)	

4.1 Decommissioning and Rehabilitation

Successful rehabilitation requires careful consideration of the local ecological context in combination with rehabilitation goals. The most important steps in undertaking a successful

rehabilitation are planning and environmental awareness (environmental education) on the importance of progressive rehabilitation (or post-activity rehabilitation) and its importance to the environment. Furthermore, to successfully implement the planned rehabilitation, practically, this will depend on a few factors, namely the rehabilitation program, characteristics of the site, nature of disturbance, rehabilitation methods, as well as resources availability.

Rehabilitation of the EPL site may include the re-vegetation of areas with species consistent with surrounding vegetation; refilling of trenches in such a way that subsoil is replaced first, and topsoil replaces last.

Any excavated pits should not only be filled with sand alone, as wind will scour the sand and re-establish the holes

Site Specific Rehabilitation Plan

To ensure that they do their best to rehabilitate the disturbed areas, the Proponent intends to:

- Utilize stockpiled subsoil and topsoil to back fill the excavated pits/trenches.
- Make financial provision that will be used for post-exploration rehabilitation program.
- Backfilling of all pits and trenches with loose materials.
- Levelling of topsoil that was stockpiled for exploration purposes.
- Removal of project vehicles and equipment from the site and taken to designated parking facility off site.
- All project support structures such as ablution facilities (toilet and washroom system), and storage containers/tanks shall be demolished, and the waste taken to designated sites. The site areas on which these structures were set up will be rehabilitated to pre-exploration state.

All accumulated waste (hazardous, solid, and general) up until the cessation of exploration activities will be removed site and transported to designated off site waste management facilities.

Appendix 1: Archaeological "*Chance Finds Procedure*"

A ***Chance Find Procedure (CFP)*** outlines the actions to be taken when previously unknown cultural heritage resources, especially archaeological sites or artifacts, are discovered during a project. This procedure ensures that such discoveries are handled responsibly, potentially halting construction or development activities while assessments are conducted. The CFP aims to protect these resources and ensure compliance with relevant regulations.

Key Steps in a Chance Find Procedure:

1. **Discovery and Reporting:** Anyone who discovers a potential heritage resource must immediately halt work and report the find to their supervisor or the project manager.
2. **Site Security:** The supervisor or project manager ensures the site is secured to prevent further damage or disturbance.
3. **Expert Assessment:** A qualified archaeologist or heritage specialist is consulted to assess the significance of the discovery and determine appropriate actions.
4. **Further Action:** Based on the assessment, the project may proceed with caution, construction may be halted, or further investigation (e.g., archaeological excavation) may be required.
5. **Compliance:** The project must comply with relevant regulations and guidelines for handling heritage resources.

Examples of Chance Finds:

- Burials or remains of deceased individuals
- Palaeontological, archaeological sites, such as settlements, burial grounds, or rock art
- Isolated artifacts, like pottery, tools, or other objects of potential cultural significance

Purpose of the Chance Find Procedure (CFP):

- **Protection of Heritage:** To prevent damage or destruction of cultural heritage resources.
- **Legal Compliance:** To ensure compliance with heritage protection laws and regulations.
- **Preservation of Information:** To document and potentially preserve important information about the past.
- **Public Education:** To raise awareness of the importance of cultural heritage and encourage responsible stewardship.

Project Manager or ECO/Site Manager/Supervisor must report the finding to the following competent authorities:

- National Heritage Council of Namibia (061 244 375)
- National Museum (+264 61 276800),
- National Forensic Laboratory (+264 61 240461).

Heritage Monitoring and Management Requirements

Throughout the development phases of the proposed project, monitoring is necessary to ensure compliance with measures agreed upon in the recommended mitigation as well as to assess how

effective the mitigation measures are in protecting the values and significance of the heritage resources. This can be achieved through regular monitoring of the project site or random visits the compliance with measures outlined in the recommendation section is monitored, recorded, and reported. However, in principle, heritage monitoring and management should be conducted and implemented by an archaeologist/heritage specialist or trained personnel while other activities especially day-to-day monitoring can be done by Environmental Control Officer (ECO) or in some cases a trained Site manager can be responsible for this.

Site monitoring: As most heritage resources occur below the surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are the initial soil removal and subsequent earthworks during the construction or development of the area. The ECO should monitor all such activities daily. If any heritage resources are found, the *chance finds procedure* must be followed as outlined in **Appendix 1**.

Monitoring is generally only considered appropriate where changes are probable or likely, and where these changes could be significant and would require remedial or specific management measures. This process can be done in all stages of the development of the proposed project, and during the actual operational phases where more impact on archaeological and heritage resources is probable.