

15<sup>th</sup> July, 2025

BY HAND

ATTENTION: Mr Timoteus Mufeti  
Environmental Commissioner

The Office of the Environmental Commissioner  
Ministry of Environment, Forestry and Tourism  
Private Bag 13306  
WINDHOEK  
Namibia

Dear Sir

**SUBMISSION OF APPLICATION FOR RENEWAL OF ENVIRONMENTAL CLEARANCE CERTIFICATE  
FOR MINING LICENCE 84A, B AND C**

We respectfully submit herewith, our Application for the Renewal of the Environmental Clearance Certificate with respect to the above-mentioned Mining Licences.

This application comprises the following:

1. Form 1 Renewal Application with attached N\$300 Revenue Stamps
2. Summary report
3. Environmental Management Plan audit.
4. Copy of the original Environmental Clearance

We trust this application will be favourably reviewed.

Yours faithfully



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Robert Carr  
Director

**ENVIRONMENTAL MANAGEMENT PLAN SUMMARY AUDIT FOR EXPLORATION AND MINING ON MINING  
LICENCES 84A, B AND C FOR THE 3-YEAR PERIOD 1<sup>st</sup> JANUARY, 2022 - 31<sup>st</sup> DECEMBER, 2024**

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
<b>Social and Environmental Performance</b>			
Management and Monitoring	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Adhere to all Namibian Legislation, including Best Practice Guidelines.</li> <li>Implementation of all aspects of the EMP during the exploration and mining phases</li> </ul>	<p>Implemented and on-going</p> <p>Implemented and on-going</p>
Consultation and Disclosure	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Maintain open and direct lines of communication with Interested and Affected Parties (I&amp;APs) with regards to environmental matters.</li> <li>Consult with I&amp;APs throughout the project process and adequately incorporate I&amp;APs' concerns.</li> </ul>	<p>This is current, especially with the landowner</p> <p>This is being done</p>
Grievance Mechanism	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Implement a grievance mechanism for receiving and resolving any concerns and grievances related to the project's social and environmental performance throughout the project life cycle.</li> <li>Inform all I&amp;APs about the mechanism.</li> <li>Address concerns promptly and transparently and in a culturally appropriate manner.</li> <li>Keep a register of all concerns/issues received from I&amp;APs, as well as the measures taken to address these.</li> </ul>	<p>This mechanism is by direct contact with parties concerned.</p> <p>Done This is also attended to</p> <p>This is in hand.</p>
Training, including awareness and inductions	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Train employees and contractors in matters related to the project's social and environmental performance and Namibia's regulatory requirements.</li> <li>Ensure adequate environmental awareness training for all senior site personnel.</li> <li>Give environmental induction presentations to all site personnel prior to work commencement (note that rehabilitation issues need to be addressed, i.e. the need to avoid damage as far as possible and from the start.</li> </ul>	<p>This is attended to through discussion with and training of employees</p> <p>This is a subject of routine discussion with employees This is routinely done, and forms part of on-going training of and engagement with employees.</p>
<b>Health, Safety and Security</b>			
Occupational Health and Safety	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Prepare a Health and Safety Plan.</li> <li>Adhere to all Namibia's Health and Safety Regulations (Labour Act, 1992: Regulations</li> </ul>	This is attended to

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		<ul style="list-style-type: none"> <li>Relating to the Health and Safety of Employees at Work).</li> <li>Hold five-minute safety talks in the morning; encourage all staff to identify and report any health or safety hazards.</li> <li>Occupational Health and Safety Training to be provided to all employees.</li> <li>Ensure that qualified first aid can be provided.</li> <li>Provide and ensure that active use of Personal Protective Equipment (PPE) (e.g. protective glasses and dust masks in dusty working conditions, overalls, gloves, safety shoes and hard hats).</li> </ul>	<p>Employees are encouraged to have a healthy diet with personal hygiene</p> <p>Safety in the workplace is routinely emphasised during toolbox talks</p> <p>These matters are attended to</p> <p>This has been addressed</p> <p>PPE is issued to all employees, who are required to use such equipment appropriately</p>
<b>Exploration Activities</b>			
Exploration Area / Driller Campsite	Disturbance of fauna and flora and habitat alteration	<ul style="list-style-type: none"> <li>No trees or natural vegetation may be removed for the making of fires.</li> <li>Do not introduce non-indigenous/alien invasive plant species.</li> <li>Keep the camp area clean and neat; store food in secure containers. No wild animal may be killed, injured, hunted, captured, disturbed, or fed.</li> <li>No unnecessary off-road driving will be allowed.</li> <li>No trespassing on adjoining properties is allowed and no livestock/game/vegetation is to be interfered with.</li> </ul>	<p>This is adhered to</p> <p>This is adhered to</p> <p>This is complied with</p> <p>This is complied with</p> <p>This requirement is complied with</p>
	Pollution of biophysical environment (air, soil and water)	<ul style="list-style-type: none"> <li>No fires will be allowed, unless specific areas have been identified and set aside for the cooking of food. Cooking appliances are to be properly maintained and ventilated.</li> <li>Pit latrines (or portable toilets; 1 toilet per 30 employees; preferred 1:15) to be provided and used at the work force dwellings or in the exploration area.</li> <li>Use bio-degradable detergents on site.</li> <li>Enforce proper waste (hazardous and non-hazardous) management practices</li> </ul>	<p>This is complied with</p> <p>This is complied with</p> <p>Complied with as may be required</p> <p>Again, these are complied with</p>

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
	Occupational Health and Safety	<ul style="list-style-type: none"> <li>• Ensure that employees are trained in the use of appropriate fire fighting equipment and ensure that such equipment is on hand at all times.</li> <li>• Comply with all safety regulations re. electricity supply.</li> <li>• Supply potable water for human consumption and other domestic uses.</li> <li>• Make suitable arrangements, as far as practicable, for the maintenance of health, the prevention and overcoming of outbreaks of disease and of adequate first aid services.</li> </ul>	<p>This is done, as applicable</p> <p>This is done</p> <p>Potable water is provided for domestic use</p> <p>Workers are encouraged to maintain high standards of personal hygiene</p>
Presence of Exploration Crew and Activities	Disturbance of fauna and flora and habitat alteration	<ul style="list-style-type: none"> <li>• A permit is required prior to the picking, cutting/chopping/picking off, taking, gathering, uprooting, damaging or destroying, or transporting any protected tree and/or plant.</li> <li>• Keep the exploration areas clean and neat.</li> <li>• No wild animal may be killed, injured, hunted, captured, disturbed, or fed.</li> <li>• Avoid off-road driving.</li> <li>• Implement and maintain track discipline with maximum speed limits (e.g. 30 km/h).</li> <li>• No trespassing on adjoining properties is allowed and no livestock/game/vegetation is to be interfered with.</li> </ul>	<p>Complied with when applicable</p> <p>This is company policy</p> <p>This is also company policy</p> <p>This is only done when required</p> <p>This is followed</p> <p>This is also company policy</p>
	Pollution of biophysical environment (air, soil and water)	<ul style="list-style-type: none"> <li>• Fuel tanks, gas cylinders and chemicals are to be properly stored and transported.</li> <li>• Pit latrines to be provided and used at the workforce dwellings or in the exploration area.</li> <li>• Ensure proper waste (hazardous and non-hazardous) management practices (as per Waste Management Plan).</li> </ul>	<p>Complied with</p> <p>Complied with</p> <p>Also complied with</p>
Exploration/Mining Activities (trenching, drilling, shaft sinking and U/G developmnt)	Loss of or damage to archaeological material	<p>All staff (i.e. exploration personnel, contractors, subcontractors, company employees, etc.) to be made aware of the provisions of the National Heritage Act 27 of 2004 with regard to the protection of all archaeological sites and the need to report any new finds.</p> <ul style="list-style-type: none"> <li>• Careful examination of the area before any site preparation/trenching/drilling is undertaken.</li> </ul>	<p>This is complied with</p> <p>Again, this is complied with</p>

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
	Clearing of vegetation for exploration activities	<ul style="list-style-type: none"> <li>Do not clear any vegetation more than six months in advance of when it is required.</li> <li>Bulldozer blading and clear cutting to be avoided (excavators and backhoes do a neater job), also clearing with heavy machinery.</li> <li>Leave large trees standing where possible.</li> <li>Reduce the visual impact of vegetation clearance as far as possible.</li> <li>Use hand tools to cut lines; survey lines or walking tracks to not exceed 1m in width.</li> <li>Only use biodegradable and then also only small lengths of tape.</li> <li>Restrict exploration activities to previously demarcated areas where feasible; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land.</li> </ul>	<p>This requirement is complied with</p> <p>This is also complied if such situation arises</p> <p>This is company policy</p> <p>This is also standard company policy</p> <p>Again, this is complied with</p> <p>Also complied with, where practically feasible</p>
	Soil erosion	<ul style="list-style-type: none"> <li><u>Sediment mobilization and transport</u>: reduce or prevent soil erosion (schedule activities to avoid heavy rainfall periods; contour and minimize length and steepness of slopes; mulching to stabilize exposed areas; re-vegetate areas promptly; and design channels and ditches for post-construction flow). Note that the area(s) towards and adjacent to the drainage line(s) are easily eroded and further development may exacerbate this problem.</li> <li><u>Road design</u>: limit access road gradients to reduce run-off induced erosion; provide adequate road drainage based on road width, surface material, compaction and maintenance.</li> <li><u>Structural (slope) stability</u>: provide effective short-term measures for slope stabilization, sediment and subsidence control until long-term measures can be implemented; adequate drainage systems to minimize and control infiltration.</li> <li>Any excavated subsoil and rock also to be stockpiled for backfilling.</li> </ul>	<p>Attention is paid to this consideration</p> <p>This is done. Drainage berms are also constructed</p> <p>This is also attended to when required</p> <p>This is standard procedure</p>

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
Use of Explosives for Blasting	Occupational Health and Safety	<ul style="list-style-type: none"> <li>• Ensure that the use, handling, and transporting of explosives is in accordance with the Regulations of the Explosives Act 26 of 1956.</li> <li>• Assign certified blasters / explosives experts to conduct the blasts.</li> <li>• Actively manage blasting activities in terms of loading, priming, and firing explosives, drilling near explosives, misfired shots and disposal.</li> <li>• Implement specific warning devices (e.g. horn signals, flashing lights) and procedures before each blasting activity (to alert all workers)</li> <li>• Conduct specific personnel training on explosives handling and safety management.</li> <li>• Implement blasting-permit procedures for all personnel involved in explosives (i.e. the handling, transport, storage, charging, blasting, and destruction of unused or surplus explosives).</li> <li>• Following a blast, wait for the smoke and fumes to clear before returning to the blast area.</li> <li>• Check (by qualified personnel) blasting sites post blast, and prior to resumption of work, for malfunctions and unexploded blasting agents.</li> <li>• If a misfire is found, restrict access to the blast area and only allow those personnel required to remove the hazard: i) do not extract explosives from a charged/misfired hole; if this presents a hazard, remove the explosives by washing them out with water (if the misfire is under water, blow them out with air); ii) if there are misfires while using cap and fuse, keep all personnel clear of the blast area for at least one hour; do not permit drilling/digging until all misfired holes have been detonated.</li> <li>• Implement specific audited procedures, in accordance to the Regulations of the Explosives Act 26 of 1956, for all activities related to explosives (handling, transport, storage, charging, blasting, and destruction of unused or surplus explosives).</li> </ul>	<p>Complied with</p> <p>Complied with</p> <p>Complied with</p> <p>Complied with</p> <p>Complied with</p> <p>Complied with, with inputs from African Explosives Limited, Namibia</p> <p>Complied with</p> <p>Complied with</p> <p>Complied with</p> <p>Complied with, with inputs from African Explosives Limited, Namibia, and members of the NamPol Explosives Division, when required.</p>

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
Drill rig, vehicles, generators	Pollution of biophysical environment	<ul style="list-style-type: none"> <li>Use biodegradable and non-toxic drill fluids/additives.</li> <li>All diesel generators on site to be placed on a tarpaulin sail.</li> <li>Oil traps to be installed in appropriate places to collect potential toxic materials.</li> <li>Immediately report and clean up any accidental hydrocarbon spill.</li> </ul>	<p>This is complied with</p> <p>Complied with when warranted</p> <p>Complied with when warranted</p> <p>Also a requirement that is complied with</p>
<b>Change in Land Use</b>			
Camp- and Exploration Sites	Change in land use (agricultural to industrial/exploration/mining)	<ul style="list-style-type: none"> <li>Restrict exploration activities to demarcated areas; all other areas will be regarded as "no go" zones in order to minimize the impact on the surrounding land.</li> </ul>	Activities are restricted to the areas within the Mining Licences
<b>Resource Use</b>			
Water Management	Resource use / depletion of natural resources	<ul style="list-style-type: none"> <li>Ensure prudent use of water in all activities.</li> <li>Re-circulate non-potable water whenever possible, when relevant.</li> <li>Water storage tanks to be insect and animal-proof and to be covered to reduce evaporation.</li> </ul>	<p>This is standard procedure</p> <p>This would be done where feasible</p> <p>This is done</p>
<b>Hazardous Materials Management</b>			
Hazardous materials management	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Establish hazardous materials management priorities.</li> <li>Avoid, or minimize the use of hazardous materials.</li> <li>Prevent uncontrolled releases of hazardous materials to the environment or uncontrolled reactions that may result in fire or explosion.</li> <li>Make sure of engineering controls; implement management controls to address residual risks not prevented or controlled through engineering controls.</li> </ul>	<p>These are in place and monitored</p> <p>This is complied with</p> <p>This is an important aspect of operation that is complied with</p> <p>These two aspects are catered for</p>
	Occupational Health and Safety	<ul style="list-style-type: none"> <li>Implement hazard communication and training programmes.</li> <li>Provide and ensure the active use of PPE.</li> </ul>	<p>This is done</p> <p>This is a company requirement</p>
<b>Waste Management</b>			
Waste management: non-hazardous and hazardous	Pollution of biophysical environment	<ul style="list-style-type: none"> <li>Prepare and submit a Waste Management Plan before exploration commences.</li> <li>Where waste cannot be recovered/re-used, it should be treated, destroyed and disposed of in an environmentally sound manner.</li> </ul>	<p>This has been done and is in place</p> <p>This is complied with</p>

ASPECT	IMPACT	MANAGEMENT ACTIONS/OBJECTIVES	IMPLEMENTATION STATUS
		<ul style="list-style-type: none"> <li>Institute and maintain good housekeeping and operating practices; littering is not allowed.</li> <li>Non-hazardous and hazardous waste to be collected and stored separately.</li> <li>Non-hazardous waste: refuse (that will not be recycled/reused/incinerated) to be stored in covered refuse bins, collected on a regular basis and disposed of at the Kupferberg landfill.</li> <li>Hazardous waste: recycle petroleum (fuels and lubricants) waste products and collect and recycle batteries. The remainder to be transported to a recognised hazardous waste disposal site (e.g. Windhoek).</li> </ul>	<p>Company policy is to strictly prevent any form of littering, by providing proper litter receptacles. Good housekeeping practices are part of strict company policy. This is complied with.</p> <p>This is also complied with.</p> <p>Waste oils are delivered to the City of Windhoek oil disposal facility at its premises in Pullman Street, Windhoek.</p>
Waste management: sanitary	Pollution of biophysical environment	<ul style="list-style-type: none"> <li>Pit latrines to be provided and used at the workforce dwellings and workplace.</li> </ul>	This is done
<b>Rehabilitation &amp; Decommissioning</b>			
Rehabilitation	Social and Environmental Performance	<ul style="list-style-type: none"> <li>Rehabilitation (of trenches and drill sites) to take place on a continuous basis.</li> <li>Disturbed areas to be backfilled with rocks and subsoil, and then the topsoil/vegetation layers.</li> <li>Drill cuttings to be disposed of in suitable nearby trenches or ground hollows.</li> <li>Manually rip (using picks or rakes) disturbed areas where compaction has taken place; avoid creating parallel furrows (this will promote erosion).</li> <li>Reshape all disturbed areas (including temporary detours and turnouts) to their original contours.</li> </ul>	<p>This is routine procedure when no longer required.</p> <p>This is complied with.</p> <p>This is also complied with when drilling takes place.</p> <p>This is attended to if such situations arise.</p> <p>This is carried out where feasible, to the best of our ability.</p>