APP-006469

EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) AREA 8403, OTJOZONDJUPA REGION

UPDATED ENVIRONMENTAL MANAGEMENT PLAN

Prepared by:

Prepared for:

Otjitombo Mining (Pty) Ltd

October 2025

Project:	**EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) AREA 8403, OTJOZONDJUPA REGION: UPDATED ENVIRONMENTAL MANAGEMENT PLAN**	
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Prepared for: **(Proponent)**	Otjitombo Mining (Pty) Ltd P O Box 97957 Maerua Park Windhoek Namibia	
Lead Consultant:	Geo Pollution Technologies (Pty) Ltd PO Box 11073 Windhoek Namibia	TEL.: (+264-61) 257411 FAX.: (+264) 88626368
Main Project Team:	**André Faul** (B.Sc. Zoology/Biochemistry); (B.Sc. (Hons) Zoology); (M.Sc. Conservation Ecology); (Ph.D. Medical Bioscience) **Ernest Pelser** (B.Sc. Zoology/Microbiology); (B.Sc. (Hons) Environmental Science); (M.Sc. Environmental Science)	
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Report Approval:	André Faul Conservation Ecologist	

I U. Hess, acting as a representative of Otjitombo Mining (Pty) Ltd, hereby confirm that all material information in the possession of the Proponent that reasonably has or may have the potential of influencing any decision or the objectivity of this plan is fairly represented in this report and the report is hereby approved.

Signed at Windhoek on the 6th day of October 2025.

Otjitombo Mining (Pty) Ltd

2013/0251
Business Registration Number

Votorantim Metals Namibia (Pty) Ltd.
Southport, Office 9B, Hosea Kutako Drive
PO Box 97957, Maerua Park
Windhoek, Namibia
Telephone Nr: +264 61 221016
Facsimile Nr: +264 61 231083

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1 INTRODUCTION

In 2022, Votorantim Metals Namibia (Pty) Ltd received an environmental clearance certificate (ECC-2200026) in respect of exclusive prospecting licence (EPL) area 8403 in the Otjozondjupa Region (Figure 1-1). It is now the intention to renew the ECC as well as transfer it to Otjitombo Mining (Pty) Ltd (the Proponent) as per Votorantim Metals Namibia's request. The EPL is for exploration for base and rare metals, precious metals, industrial minerals, and semi-precious stones. Exploration activities may comprise any combination of remote sensing, geological mapping, geochemical sampling, geophysical ground surveys, and diamond core drilling. The EPL is approximately 5,330 ha in extent and is in its entirety located on commercial farmland.

An environmental impact assessment (EIA) was conducted for their exploration activities on EPL 8403 in 2022 (Environmental Compliance Consultancy, 2022). The EIA together with an environmental management plan (EMP) (Environmental Compliance Consultancy, 2022) were submitted to the Ministry of Environment, Forestry and Tourism (MEFT) as part of an application for an ECC. An ECC was subsequently granted to the Proponent on 12 December 2022 (Appendix A).

Geo Pollution Technologies (Pty) Ltd was now appointed by the Proponent to update the EMP and to apply for renewal of the ECC. An EMP is a tool used to take pro-active action in terms of environmental management by addressing potential problems before they occur. It is a stand-alone, living document, which can be used during the various phases (planning, construction, operational and decommissioning) of any proposed activity or development. The updated EMP will continue to provide management options to ensure negative impacts of exploration are prevented or minimised, while simultaneously enhancing resultant benefits and positive spinoffs. This should ultimately limit the need for corrective measures during the various stages of the project.

All contractors and sub-contractors taking part in exploration and related activities should be made aware of the relevant sections of the EMP, so as to plan the relevant exploration activities accordingly and in an environmentally sound manner.

The objectives of the EMP are:

- to include all potential significant impacts of the various activities of exploration;
- to prescribe the best practicable control methods to prevent or minimise the environmental impacts associated with exploration;
- to monitor and audit the performance of relevant contractors and employees in applying such controls; and
- to ensure that appropriate environmental training is provided to relevant contractors and employees.

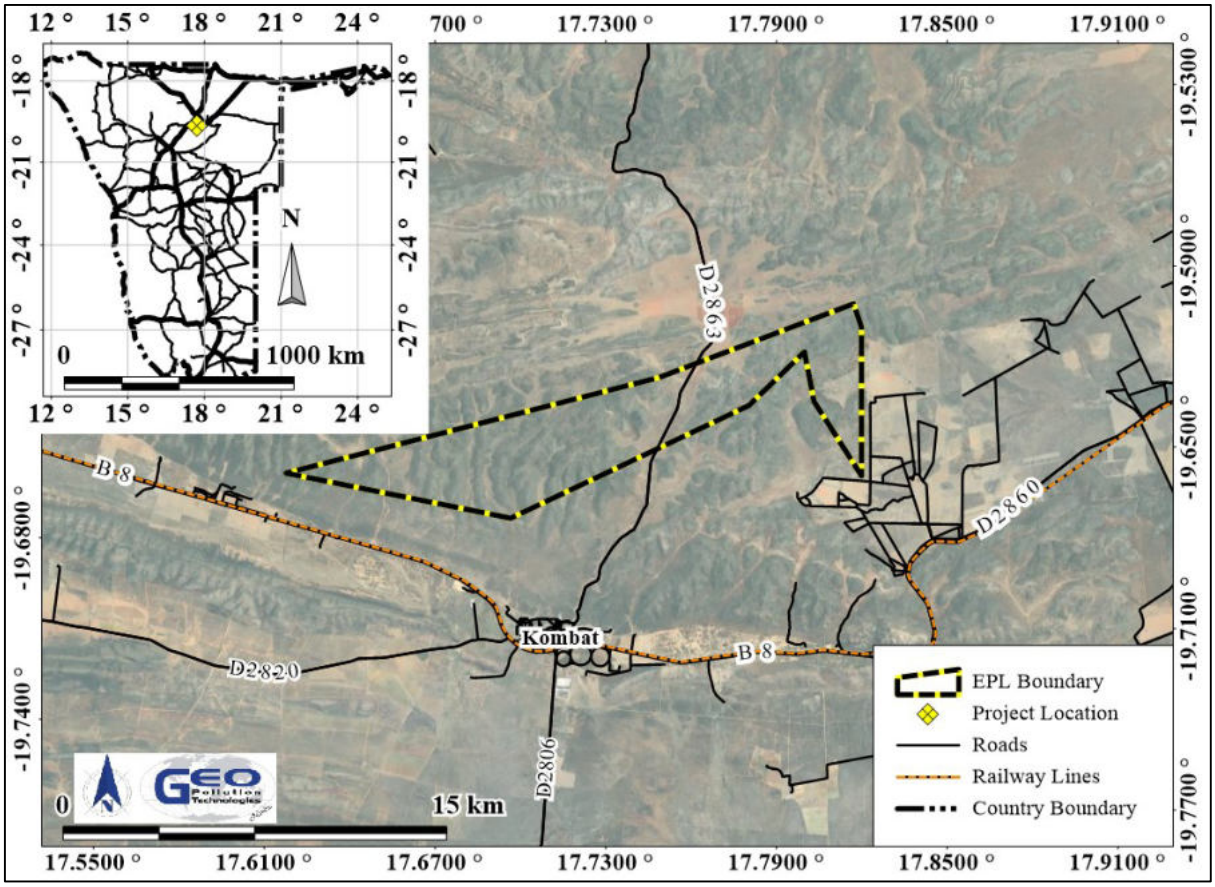

Figure 1-1 Project location

2 ADMINISTRATIVE, LEGAL AND POLICY REQUIREMENTS

To protect the environment and achieve sustainable development, all projects, plans, programmes and policies deemed to have adverse impacts on the environment require an ECC, as per the Namibian legislation. The legislation and standards provided in Table 2-1 to Table 2-3 govern the environmental assessment process in Namibia and/or are relevant to the project.

Table 2-1 Namibian legislation applicable to the project

Law (as may be amended)	Key Aspects
The Namibian Constitution	♦ Promotes the welfare of people. ♦ Incorporates a high level of environmental protection. ♦ Incorporates international agreements as part of Namibian law.
Environmental Management Act Act No. 7 of 2007, Government Notice No. 232 of 2007	♦ Defines the environment. ♦ Promotes sustainable management of the environment and the use of natural resources. ♦ Provides a process of assessment and control of activities with possible significant effects on the environment.
Environmental Management Act Regulations Government Notice No. 28-30 of 2012	♦ Commencement of the Environmental Management Act. ♦ Lists activities that requires an environmental clearance certificate. ♦ Provides environmental impact assessment regulations.

Law (as may be amended)	Key Aspects
Minerals (Prospecting and Mining) Act Act 33 of 1992, Government Notice No. 199 of 1992	♦ Provides for the reconnaissance, prospecting and mining for, and disposal of, and the exercise of control over, minerals in Namibia; and to provide for matters incidental thereto.
Soil Conservation Act Act No. 76 of 1969	♦ Law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources in Namibia.
Petroleum Products and Energy Act Act No. 13 of 1990, Government Notice No. 45 of 1990	♦ Regulates petroleum industry. ♦ Makes provision for licencing and safe storage and handling of fuels. ♦ Petroleum Products Regulations (Government Notice No. 155 of 2000).
Water Resources Management Act Act No. 11 of 2013	♦ Provides for management, protection, development, use and conservation of water resources. ♦ Prevention of water pollution and assignment of liability.
Forest Act (Act 12 of 2001, Government Notice No. 248 of 2001)	♦ Makes provision for the protection of the environment and the control and management of forest fires. ♦ Provides the licencing and permit conditions for the removal of woody and other vegetation as well as the disturbance and removal of soil from forested areas. ♦ Forest Regulations: Forest Act, 2001 (Government Notice No. 170 of 2015) ♦ Declares protected trees or plants. ♦ Issuing of permits to remove protected tree and plant species.
Local Authorities Act Act No. 23 of 1992, Government Notice No. 116 of 1992	♦ Defines the powers, duties and functions of local authority councils. ♦ Regulates discharges into sewers.
Public and Environmental Health Act Act No. 1 of 2015, Government Notice No. 86 of 2015	♦ Provides a framework for a structured more uniform public and environmental health system, and for incidental matters. ♦ Deals with Integrated Waste Management including waste collection disposal and recycling; waste generation and storage; and sanitation.
Labour Act Act No 11 of 2007, Government Notice No. 236 of 2007	♦ Provides for Labour Law and the protection and safety of employees, including in the mining industry. ♦ Labour Act, 1992: Regulations relating to the health and safety of employees at work (Government Notice No. 156 of 1997).
National Heritage Act (Act No. 27 of 2004, Government Notice No. 287 of 2004)	♦ Provides for protection and conservation of places and objects of heritage significance and the registration of such places and objects.
Nature Conservation Ordinance Ordinance No. 4 of 1975	♦ Consolidates and amends the laws relating to the conservation of nature and the establishment of game parks and nature reserves. ♦ Assigns certain conservation categories to specific organisms within Namibia.

Law (as may be amended)	Key Aspects
Atmospheric Pollution Prevention Ordinance Ordinance No. 11 of 1976	♦ Governs the control of noxious or offensive gases ♦ Prohibits scheduled process without a registration certificate in a controlled area. ♦ Requires best practical means for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process.
Hazardous Substances Ordinance Ordinance No. 14 of 1974	♦ Applies to the manufacture, sale, use, disposal and dumping of hazardous substances as well as their import and export. ♦ Aims to prevent hazardous substances from causing injury, ill-health or the death of human beings.
Pollution Control and Waste Management Bill (draft document)	♦ Not in force yet. ♦ Provides for prevention and control of pollution and waste. ♦ Provides for procedures to be followed for licence applications.

Table 2-2 Standards or codes of practise

Standard or Code	Key Aspects
South African National Standards (SANS)	♦ The Petroleum Products and Energy Act prescribes SANS standards for the construction, operations and demolition of petroleum facilities. ♦ SANS 10131 is specifically aimed at storage and distribution of petroleum products in aboveground storage tanks. o Provides requirements for spill control infrastructure.

Table 2-3 Relevant multilateral environmental agreements for Namibia and the development

Agreement	Key Aspects
SADC Protocol on Mining, 1997	♦ Member states agree to share information on exploitable mineral resources in the region, enhance the technological capacity of the sector as well as promote policies that will encourage and assist small scale mining. ♦ Environmental and occupational health and safety issues are highlighted.
Stockholm Declaration on the Human Environment, Stockholm 1972.	♦ Recognises the need for a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment.
United Nations Framework Convention on Climate Change (UNFCCC)	♦ The Convention recognises that developing countries should be accorded appropriate assistance to enable them to fulfil the terms of the Convention.
Convention on Biological Diversity, Rio de Janeiro, 1992	♦ Under article 14 of The Convention, EIAs must be conducted for projects that may negatively affect biological diversity.
1985 Vienna Convention for the Protection of the Ozone Layer	♦ Aims to protect human health and the environment against adverse effects from modification of the Ozone Layer are considered. ♦ Adopted to regulate levels of greenhouse gas concentration in the atmosphere.

Listed activities which require an ECC application (Government Regulation No 29 of 2012) which may be triggered by the exploration activities include the following:

Section 3 of Government Notice No. 29 of 2012: Mining and Quarrying Activities

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.

Relevance: The Proponent has an exclusive prospecting licence and is actively involved with exploration activities.

Section 4 of Government Notice No. 29 of 2012: Forestry Activities

4. The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.

Relevance: Although no large scale clearance of vegetation will be required, some trees protected under the Forestry Act may require removal. This requires a permit from the MEFT.

Section 9 of Government Notice No. 29 of 2012: Hazardous Substance Treatment, Handling and Storage

9.1 The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.
9.2 Any process or activity which requires a permit, licence or other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an amendment of an existing permit, licence or authorisation or which requires a new permit, licence or authorisation in terms of a law governing the generation or release of emissions, pollution, effluent or waste.

Relevance: Fuel will be required on site when exploratory drilling is performed.

3 ENVIRONMENTAL MANAGEMENT PLAN

Section 3 outline the management of the environmental elements that may be affected by the different exploration activities. Impacts addressed and mitigation measures proposed are seen as minimum requirements which have to be elaborated on by the Proponent, where relevant. Delegation of prevention and mitigation measures as well as reporting activities, should be determined by the Proponent and included in the EMP. The EMP is a living document that must be prepared in detail, and regularly updated, by the Proponent as the project progress and evolve.

The EMP and ECC must be communicated to exploration managers. A copy of the ECC and EMP should be kept on site. All monitoring results must be reported on as per the conditions of the ECC. Reporting is important for any future renewals of the ECC and must be submitted to the MEFT.

Various potential and definite impacts will emanate from the exploration activities. The majority of these impacts can be prevented or mitigated to within acceptable limits. The following sections provide different management measures to be considered and implemented by the Proponent.

3.1 PLANNING

Planning is not only limited to before the exploration phase is entered, but is ongoing throughout the validity of the awarded EPL. When planning to conduct exploration, it is the responsibility of Proponent to ensure all personnel and contractors are and remain compliant with all legal requirements and the provisions of the EMP. This includes ensuring that all required management measures are in place prior to and during exploration, to ensure potential impacts and risks are prevented or minimised. The management structure of the Proponent is presented in Figure 3-1.

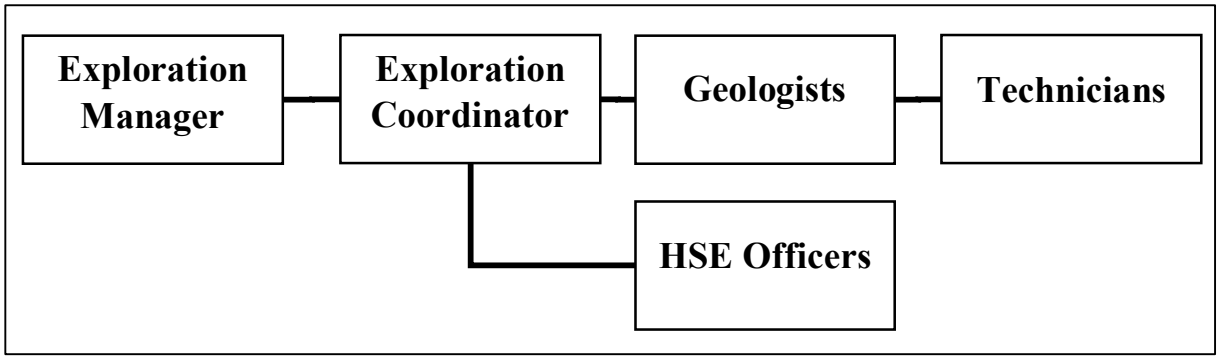

Figure 3-1 Management organogram

The following actions are recommended for the planning phase and should continue during various other phases of the project:

3.1.1 Delegation of Responsibilities

- Make provisions to have a health, safety and environmental coordinator or similar to implement the EMP and oversee occupational health and safety as well as general environmental related compliance.
- Delegate EMP responsibilities to relevant personnel and contractors.

3.1.2 Risk Management and Emergency Response Preparedness

- Have relevant standard operating procedures and emergency response plans, equipment and personnel on site to prevent and deal with potential emergencies and incidents:
- Examples include health, safety and environment (HSE) manuals, site induction protocols, material safety data sheets, firefighting and evacuation plans and equipment, spill response plans, first aid training and first aid kits, etc.

3.1.3 Legal Compliance

- Compile an internal legal register outlining all required authorisations, permits and licences required to execute exploration activities.

- Comply with the various applicable acts and their respective regulations, for example pertaining to labour, income and other taxes and levies, work permits, etc.
- Ensure all necessary permits and authorisations from the various ministries, local authorities and any other bodies that govern exploration activities are in place and remains valid. These include the ECC, the EPL, drilling permits, permits for removal of protected trees (if required), exemption permits for storage of fuel, authorisations for aerial surveys, if any (helicopter, drone or aeroplane), etc.
- Apply for renewal of the ECC prior to expiry.

3.1.4 Surface Access Agreements

- Enter into agreements with the various land owners affected by the EPL and exploration activities. Such agreements should clearly stipulate the responsibilities of all parties involved, including restrictions pertaining to entry, movement and activities on the land, expectations of the land owner regarding rehabilitation once exploration activities cease, etc.

3.1.5 Employment and Contractor Appointments

- Ensure all appointed employees and contractors enter into an agreement with the Proponent, which among others include contractual adherence to the EMP. Ensure the contents of the EMP are understood by the employees contractors, sub-contractors and all personnel present or who will be present on explorations sites. This may require environmental training pertaining to the "value of nature" (why we need to protect the environment), explanation of various terminology, monitoring requirements, consequences of non-compliance, etc.

3.1.6 Rehabilitation and Pollution Clean-up

- If not already established, establish and maintain a fund/insurance for rehabilitation of the exploration sites, or for unforeseen events where environmental pollution occur which requires clean-up and/or remediation.

3.1.7 Community Liaison

- Appoint a community liaison officer and devise a community liaison strategy. Communicate his/her contact details, and the procedures for filing of complaints or providing feedback/input, to the affected land owners and other relevant stakeholders.
- Maintain a complaints register which details, among others, the date the complaint is received, the name and contact details of the person filing the complaint, the nature of the complaint, action taken to address and prevent future incidents of a similar nature, a copy of the feedback provided to the person filing the complaint.

3.1.8 Monitoring and Reporting

- Maintain an incidents register which detail, among others, the date the incident occurred, the names and contact details of persons involved in the incident, the nature of the incident, and action taken to address and prevent future incidents of a similar nature.
- Establish and / or maintain an environmental reporting system to report on environmental management procedures and incidents as outlined in the EMP.
- Submit environmental monitoring reports to the MEFT in compliance with the conditions linked to the ECC.

3.2 EMPLOYMENT

Appointment of consultants already realises during the planning phase. This include those responsible for permitting. During exploration, some contractors may be appointed to conduct specialised tasks. Local consultants, contractors and their employees, are thus supported, and their livelihoods sustained. Some aspects may require expertise not locally available, in which case foreign consultants or contractors may be used.

The Proponent appoints unskilled, semi-skilled and specialist employees to perform tasks related to exploration. This range from office administration to the highly specialised activities involved with in-field geological surveys and drilling. Employees are sourced locally, however specialised skills may not be locally available and may be sourced from outside of Namibia.

Desired outcome: To maximise the appointment of Namibian consultants, contractors and employees to contribute to a reduction in overall unemployment.

Actions

Enhancement:

- Employ local Namibians as far as practically possible, and, where preferred by the land owner, members of his own workforce should be employed.
- Appointment of foreign employees or contractors must be in line with the requirements of the Ministry of Home Affairs, Immigration, Safety and Security.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Labour Act
- Immigration Control Act
- Bi-annual summary report based on employee records with employee contracts, work permits, etc. on file.

3.3 SKILLS, TECHNOLOGY AND DEVELOPMENT

Development of people and technology are key to economic development. Exploration for mineral resources requires a workforce that ranges from highly specialised to general workers. Advanced exploration technologies are often used and training is provided to a portion of the workforce to be able to use these technologies and to perform certain tasks according to the required standards. Skills are periodically transferred to an unskilled workforce for general tasks. During normal exploration and related activities, employees will increase their work experience while some individuals may be identified for promotion and additional skills development and training.

Desired Outcome: To see an increase in skills of local Namibians, as well as development and technological advancements in the mining industry and local community.

Actions

Enhancement:

- If the skills and technology exist locally, contractors and employees must be sourced from Namibia. Deviations from this practice is justified where local or Namibian options are not available.
- Skills development and improvement programs to be made available to Namibians as identified during employee performance assessments. This increases their chances of being successful in job applications if no longer employed by the Proponent.
- Employees to be informed about parameters and requirements for references upon employment. The Proponent to issue reference letters or testimonials to employees, during their period of employment, to ensure they have proof of work experience and competence should they leave the company.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Record should be kept of any formal or informal training provided.
- Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- Bi-annual summary report based on records kept.

3.4 CONTRIBUTION TO THE ECONOMY

Mining and mining related activities attract foreign investment. The Proponent's exploration activities in Namibia have and will continue to generate revenue which is paid to the national treasury. Various consultants, contractors and employees are remunerated and various taxes, levies and fees are paid. This stimulates Namibia's economic development and promotes additional investments and business development.

At local scale, businesses in the area can benefit from the presence of the exploration team.

Desired Outcome: Contribution to the national treasury and economy

Actions

Enhancement:

- Procurement and maintenance of vehicles and machinery from the Namibian business sector.
- The Proponent must employ local Namibians and contractors where possible.
- Where available, engage with local businesses for the provision of goods and services.
- Adherence to all Namibian laws relating to the payment of taxes, levies, etc.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Bi-annual summary report based on employee and contractor records, procurement of goods and services, etc. on file.

3.5 INFORMATION SHARING AND KNOWLEDGE BASE EXPANSION

Through exploration activities, new information on the local environment is generated. This contributes to the knowledge base of the overall Namibian geophysical environment. It can also benefit the land owner when selected information is shared by the Proponent. It can, for example, inform the land owner of specific geological structures which may have an increased success rate when targeted for borehole development.

Desired Outcome: Accurate record keeping of new information and continued sharing of relevant information with land owners.

Actions

Enhancement:

- Accurate record keeping of any newly generated information and data.
- Share relevant geophysical information, or any extraordinary sightings, with land owners where they can benefit from the information, specifically in terms of borehole development. Information can also include observations related to the presence of snares, incidents of poaching, rare species sightings, etc.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Records kept of all information shared with authorities, neighbours and employees.

3.6 IDEALS AND ASPIRATIONS FOR THE FUTURE

During the environmental assessment, pubic consultation was conducted with land owners and interested and or affected parties. Information shared with some of the parties resulted in a change in their aspirations for the future. This related to the possibility of additional revenue streams that may result from exploration activities and potentially mining. Such revenue streams included the provision of services to the exploration team, e.g. accommodation, or being employed by the Proponent. The possibility of exploration in the area also resulted in a negative impact on the ideals and aspirations of the land owners where they felt exploration, and possibly future mining, may negatively impact their livelihoods by reducing their farmable land.

Ideals and aspirations of employees are also considered. Poor communication between management and employees may lead to uncertainty in with regard to job security and options for promotion.

Desired Outcome: Continued sharing of accurate and easily understandable information, planned activities, project progress and opportunities with land owners, IAPs and government agencies. Maintaining an open door policy with land owners and IAPs.

Actions

Enhancement:

- Develop a stakeholder engagement plan for the implementation phase of the project which should outline how and when possibly affected landowners will be engaged with.
- Appoint or assign a community liaison officer to communicate with all affected property owners in a timeous manner about project activities / changes.
- Information about major changes in proposed exploration activities should be made available to land owners, government agencies and interested and affected parties.
- Open communication regarding future exploration activities, opportunities and employment with both land owners and employees.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Up to date stakeholder database
- Records kept of all information shared with authorities, neighbours and employees.

3.7 DEMOGRAPHIC PROFILE AND COMMUNITY HEALTH

The scale of the exploration project is limited and it is not expected to create a change in the demographic profile of the nearby local communities. Where possible, existing labour, already employed by the Proponent will be used or new labourers will be sourced from a nearby town, or possibly from the land owners. Community health may be exposed to factors such as communicable disease like HIV/AIDS and tuberculosis (TB) and social ills or deviant behaviour like alcoholism/drug abuse, associated with increased spending power of the labour force. Similarly, workers from the exploration team may visit farm labourer compounds, and vice versa, and this may further expose both groups to the same social ills and diseases. Incidences of theft may occur and this may also be when criminals pose as employees of the exploration team present in the EPL area.

Positive impacts will relate to employees and contractors' increased economic resilience and improved livelihoods.

Desired Outcome: To prevent the in-migration and growth in informal settlements and to prevent the spread of communicable diseases and prevent / discourage socially deviant behaviour and criminal activities.

Actions:

Prevention:

- Thorough background checks and testimonials when appointing new employees.
- Provide educational programmes / information sessions for employees on various topics of health, social behaviour, etc., including communicable diseases, financial management and general upliftment of employees' social status.
- Clearly stipulate restricted activities when working within the EPL. Include any such activities stipulated in surface access agreements.
- Provide time schedules, names and vehicle registration numbers of the project team to land owners well in advance (and any other information as per the surface access agreement). Communicate any changes to land owners.
- All employees to wear easily distinguishable uniforms/clothing, with name tags that can be checked against the provided list of employees who will be present on the land.
- Inform land owners of each arrival onto and each departure from the land.
- No movement out of areas pre-arranged with the landowner.
- In the event that the exploration team must make use of a temporary camp for accommodation on any privately owned land, adhere to the following:
  - Provide adequate sanitary and ablution facilities.
  - No unauthorised visitors to be allowed at exploration sites and camps.
  - Employees to stay at the camp and authorised areas and no wandering outside of these or visits to nearby workers' compounds.
  - All waste to be contained and removed from site to ensure hygienic conditions.
- Where contractors are required, ensure they are reputable and will strictly implement and follow the same measures as stipulated for the Proponent's team.

Mitigation:

- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Surface access agreements
- Company policies, procedures and rules
- For temporary camps, regularly completed inspection sheets, for all areas which may present environmental health risks, must be kept on file.
- Bi-annual summary report based on educational programmes and training conducted.

3.8 HEALTH AND SAFETY

Various activities associated with exploration are reliant on physical human labour, in the outdoors, and the operation of machinery. Therefore health and safety risks exist. Such risks include exposure to environmental elements extreme heat or cold, sunstroke, dehydration, trips and falls, vehicle accidents, getting caught in moving parts of machinery, cuts, exposure to hazardous chemicals (e.g. hydrocarbons) and encounters with wild, potentially dangerous, animals.

The EPL is remote and situated halfway between Grootfontein and Otavi, where the nearest medical facilities will be located.

Desired Outcome: To prevent injury and health impacts

Actions

Prevention:

- Implement and maintain an integrated health and safety management system.
- All health and safety standards specified in the Labour Act should be complied with.
- Ensure that all personnel receive adequate training on operation of equipment / handling of hazardous substances (mainly hydrocarbons – fuel, hydraulic fluid, etc.) and all drivers are appropriately licenced.
- All employees and visitors to the exploration areas must receive appropriate induction prior entry.
- Provide all employees with required and adequate personal protective equipment (PPE) and training in the proficient use thereof. This should include clothing and sunscreen to prevent sunburn or heatstroke.
- Ensure sufficient potable water is available to all workers at all times and remind employees to stay hydrated, especially in warm summer months.
- To prevent unauthorised entry, temporary camp and drill sites must be fenced off.
- Place and securely stow all heavy equipment (e.g. drill rods and casing) to prevent objects toppling over or falling on employees. Demarcate potentially dangerous areas like the drilling fluid sumps.
- No alcohol or recreational drugs should be allowed on site and no personnel should operate equipment under the influence of any drugs, including medicine that cause drowsiness and impaired judgement.
- Maintain all equipment and vehicles in good working order to minimise the risk of accidents (e.g. replacing of worn vehicle tyres, replacing damaged drill rods, etc.)
- Staff should be educated / trained on human wildlife conflict management and be informed not to approach wild animals and to be vigilant for, and not to confront (attempt to kill or catch), snakes or other potentially venomous / dangerous animals.
- Regular checks for ticks and wearing of repellents and clothing to prevent them from attaching.

Mitigation:

- Selected personnel should be trained in first aid and a first aid kit must be available on site. This should include for example snake identification and handling of snake bites.
- The contact details of all emergency services must be readily available and a satellite phone must be available if areas with no cellular reception is entered.
- In case of any injury or illness, first aid should be applied and the employee transported to a medical facility if required.
- For serious injuries, emergency services should be contacted for evacuation to the nearest emergency facility.
- All personnel with known medical conditions must keep their own medicine nearby at all times. This includes treatment for severe allergies to for example bee stings.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Any health and safety incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained

3.9 SECURITY

Security risks will be related to unauthorised entry into temporary exploration camps, theft and sabotage. Similarly, the presence of foreign workers in the area may expose the land owners to security issues such as theft (e.g. poaching, stock theft). Criminals may take the opportunity to pose as exploration team workers in order to access the areas.

Desired Outcome: To prevent deviant and criminal behaviour such as theft.

Actions

Prevention:

- Thorough background checks and testimonials when appointing new employees.
- Clearly stipulate restricted activities when working within the EPL. Include any such activities stipulated in surface access agreements.
- Provide time schedules, names and vehicle registration numbers of the project team to land owners well in advance (and any other information as per the surface access agreement). Communicate any changes to land owners.
- All employees to wear easily distinguishable uniforms/clothing, with name tags that can be checked against the provided list of employees who will be present on the land.
- Inform land owners of each arrival onto and each departure from the land.
- No movement out of areas pre-arranged with the landowner.
- Prior to entering an EPL, confirm with the land owner which gates should be left open and which should be closed.
- Where contractors are required, ensure they are reputable and will strictly implement and follow the same measures as stipulated for the Proponent's team.

Mitigation:

- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.
- Vehicles accessing farms could be fitted with trackers and dash cams to allow the Proponent to investigate any complaints made by landowners about unauthorised movement and incidents on their land.
- Report any suspected "out of the ordinary" sightings such as dead animals (suspected poaching), open gates, suspicious persons, etc. to the land owner.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Surface access agreement
- Any incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents reported and action taken.

3.10 VEHICLE MOVEMENT

Exploration activities occur on farmland, thus traffic impacts on public roads will be limited to the occasional movement of vehicles to and from the EPL when exploration is performed. This can include slow moving drill rigs. The impact on public roads are expected to be minor.

Although only a few vehicles will access private roads in the EPL area, such as on privately owned farms, it may constitute a significant increase in traffic compared to the status quo. Potential impacts include dust, noise, running over or collisions with wildlife and livestock, stressed wildlife, and damage to roads, especially when it rains and road surfaces are wet.

Desired Outcome: Minimum impact on traffic on public roads, no transport or traffic related incidents, impacts and disturbances on privately owned land/roads

Actions

Prevention:

- All drivers of vehicles must have valid drivers' licences appropriate for the vehicle driven and be trained in off-road driving.
- All vehicles to be roadworthy and appropriately licensed.
- If significant traffic impacts are expected on public roads, possibly as a result of slow moving drill rigs, traffic management should be performed.
- Implement speed limits on farm roads to minimise dust and noise and to prevent running over or collisions with wildlife or livestock. For roads near residences or livestock enclosures, and for very dusty roads, speed can further be reduced.
- All drivers should be vigilant for any wildlife near or in roads to prevent running over or collisions with wildlife and livestock.
- Maintain all vehicles' in good mechanical condition to ensure they do not produce excessive noise.
- For sandy areas, engage four-wheel drive and reduce tyre pressure to prevent unnecessary wheel spin and damage and corrugation of roads.

Mitigation:

- Repair any damaged roads.
- Report any collisions with livestock or wildlife to the land owner.
- Vehicles accessing farms could be fitted with trackers and dash cams to allow the Proponent to investigate any complaints made by landowners about unauthorised movement and incidents on their land.
- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Any complaints received regarding vehicle movement should be recorded together with action taken to prevent impacts from repeating itself.
- A bi-annual report should be compiled of all incidents reported, complaints received, and action taken

3.11 NOISE

Noise related to exploration activities is mainly limited to vehicle movement, aerial surveys and exploration drilling. Helicopter, aeroplane or drone technology used for aerial photography or geophysical surveys, will introduce noise unfamiliar to wildlife and livestock, especially at low altitude flying.

Desired Outcome: To prevent any hearing loss among employees and not to be a nuisance or cause stress in wildlife and livestock.

Actions

Prevention:

- Follow Health and Safety Regulations of the Labour Act on maximum noise levels to prevent hearing impairment of employees, specifically if drilling is conducted.
- All vehicles and machinery must be regularly serviced to ensure minimal noise production. This include fitting noise dampers on for example compressors used for reverse circulation drilling.
- Exploration activities should only be conducted in daytime, during weekdays, unless otherwise arranged with the land owner.
- If helicopters, drones or aeroplanes are used for aerial surveys, it should be performed at times agreed upon with the land owner
- Helicopter, drone or aeroplane surveys must be performed for the minimum time possible, and as high above the ground as possible, while still ensuring good quality data.
- Noise dampers to be fitted on machines where suitable and alternative signalling adopted where possible.
- For vehicle noise also refer to section 3.10.

Mitigation

- Personnel working in noisy environments must be issued with hearing protectors, specifically if drilling is conducted.
- Where helicopters, aeroplanes or drones cause distress in animals, operations should cease until they have moved away, before it can continue.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Health and Safety Regulations of the Labour Act, Civil Aviation Act
- Surface access agreement.
- Maintain a complaints register.
- Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences

3.12 FIRE

Fires outside of designated areas and discarded cigarettes can cause veld fires which can quickly spread and get out of control. Similarly, machinery can ignite dry vegetation if sufficient heat (e.g. exhaust pipes) or sparks are produced. Fuels stored and used for exploration activities may be flammable. Veld fires originating elsewhere (e.g. lightning) can pose a threat to the exploration teams.

Desired Outcome: To prevent fires causing property damage, loss in vegetation, possible injury caused by uncontrolled fires.

Actions:

Prevention:

- Prepare a holistic fire protection and prevention plan. This plan must include an emergency response plan, a firefighting plan and a communication strategy for informing the land owner and neighbours about a fire. The plan should form part of the surface access agreement.
- Communication methods (e.g. satellite phones where cellular phone reception is limited) must be available at all times for rapid communication with the land owner and surrounding farmers to immediately be able to notify them of a fire.
- Personnel training (safe operational procedures, firefighting, fire prevention and responsible housekeeping practices).
- All vehicles to be fitted with fire extinguishers and have equipment to specifically fight veld fires available.
- For drilling sites and if temporary camps are used:
  - Maintain regular vehicle and machinery mechanical and electrical inspections and maintenance.
  - Ensure all flammable chemicals are stored according to material safety data sheet (MSDS) and SANS instructions and all spills or leaks are cleaned up immediately.
  - Have serviced firefighting equipment within easy reach, including those used to fight veld fires.
  - Fire used for purposes such as cooking must only be allowed within designated areas far removed from any flammable material such as dry vegetation.

Mitigation:

- Implement the fire protection and firefighting plan in the event of a fire and inform the relevant land owner and potentially affected parties.
- Quick response time by trained staff will limit the spread and impact of a fire.
- A rapid response to a veld fire is crucial in bringing it under control and extinguishing it as soon as possible.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A register of all incidents must be maintained on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested and training given

3.13 VISUAL

Activities that may have a visual impact are exploratory drilling, the associated roads leading to drill sites, and possible erosion where vegetation is cleared. Rehabilitated drill sites and cleared areas takes time to recover to such an extent that it is no longer visible, and are prone to erosion. Newly drilled boreholes are distinctly visible due to the vegetation clearing and waste rock usually associated with such sites. Borehole casing protruding from the ground also has a visual impact. Numerous drill sites will thus alter the landscape character. In addition newly drilled sites are often uniquely visible from the air and on open source satellite imagery due to the presence of drill cuttings and dust. Such changes may affect receptors which are reliant on the existing landscape character (such as tourism).

Desired Outcome: To minimise potential visual impacts and changes to the landscape character

Actions

Mitigation:

- At the drill site, regular waste disposal and good housekeeping will ensure a low visual impact.
- Drill sites should be sufficiently rehabilitated. All drill cores as well as cuttings with a significantly different colour than the surface soil should be removed from site. Other cuttings can be dispersed around the site and loosely raked to limit the visual impact.
- Stored topsoil should be returned and spread over the site to speedup re-establishment of vegetation.
- Compacted soil must be ripped along contour and not down slope. This will loosen soil, promote water infiltration, aid re-vegetation and limit soil erosion.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A report should be compiled of all complaints received and actions taken.
- Maintain a photo log for comparison of all exploration (drill) sites prior to entry by the drill team and after rehabilitation is completed.

3.14 SOIL, SURFACE WATER AND GROUNDWATER

Groundwater is the only source of potable water within the EPL area. Infiltration of as much uncontaminated precipitated water is greatly desired so as to recharge groundwater resources. Care must thus be taken to avoid contamination of soil and surface water. No known permanent surface water sources are present within the EPL area. Pollution in dry riverbeds may however result in downstream and groundwater pollution when they flow during rainy seasons.

Contamination of the groundwater can occur via polluted water infiltrating through sediments or through fractures, joints and faults that are present in the subsurface. Soil contamination can occur from chemical and hydrocarbon spills during refuelling, during maintenance of equipment and machinery, or if mobile fuel tanks (bowsers) are involved in accidents on route to drill sites. Hydraulic oil leaks are common on drilling rigs and pipe bursts may release oil into the environment. Contamination of groundwater could also occur through infiltration of waste from field toilets. This is specifically applicable to exploration camp sites.

Soil may further become compacted or disturbed (powdered) as a result of heavy motor vehicles and equipment and this affects soil quality and may lead to excessive erosion. Similarly, although very few steep sloped areas are present within the EPL, clearing of slopes greater than 12.5° may present a greater erosion risk.

Drilling of exploration holes may penetrate a confining aquifer layer (aquitard). This may cause mixing of aquifer water where the one aquifer may contain water of a poor quality, causing contamination of the aquifer having better quality. An alternative impact may be the leaking of water from one aquifer into another, causing existing boreholes to dry up or springs to dry up. Based on the limited amount of information available, it is not expected that such impacts would occur within the project area. It would however be advisable to take care during drilling that proper monitoring is taking place to evaluate for such conditions and that appropriate remedial actions be implemented where needed – the precautionary principal should be applied.

Desired Outcome: To prevent the contamination of soil and water

Actions

Prevention:

- Training of operators of machinery and vehicles and employees must be conducted on a regular basis (responsible driving, fuel and chemical handling, spill detection, spill control).
- All machinery and vehicles should be properly maintained to be in a good working condition with no leaks and reduced possibilities of pipe bursts/breakages.
- Employ drip trays and spill kits when leaks are detected or servicing / repairs of equipment is needed.
- The contents of mobile chemical toilets must be removed from site and disposed of at a registered waste water treatment plant.
- Limit movement to existing roads as far as is practically possible.
- Limit interference with drainage lines.
- Where drill sites are levelled to create drill pads and campsites, topsoil must be stored for rehabilitation purposes after drilling is complete and the site is decommissioned.
- If land clearing is required in areas with a slope greater than 12.5°, mitigation measures should be employed to prevent erosion and formation of gullies. All mitigation measures to be agreed with the land owner.

Mitigation:

- Any fuel spillage of more than 200 litre must be reported to the MIME.
- Spill clean-up means must be readily available on site as per the relevant MSDS and any spill must be cleaned up immediately to prevent it from reaching sensitive receptors.
- Hazardous waste must be contained and disposed of at a suitably classified hazardous waste disposal facility.
- Rehabilitate areas where soil or drainage lines are disturbed.
- Compacted areas can be lightly ripped and contoured to encourage vegetation establishment and to get rid of tracks.

- After exploratory drilling is complete, the boreholes must be handled according to the drill permit conditions. Where such conditions are lacking, boreholes should either be backfilled or secured with a steel or unplasticized polyvinyl chloride (uPVC) casing equipped with a secure cap. Drill cuttings should not be used for backfilling boreholes as minerals in the cuttings may have oxidised and will then potentially be released into the groundwater, together with salts present in the cuttings. Clean sand or clay should be used where possible.
- Backfilling or closing of the boreholes should be performed to avoid organisms from falling into the boreholes and to prevent surface runoff from contaminating the groundwater, where the borehole will form a preferential flow path if not properly sealed.
- Boreholes should be cemented where boreholes intersect confining layers separating aquifers with different water quality or causing artesian conditions.

Responsible Body:
- Proponent
- Contractors

Data Sources and Monitoring:
- Maintain MSDS file for hazardous chemicals.
- Maintain a photo log for comparison of all exploration (drill) sites prior to entry by the drill team and after rehabilitation is completed
- Report all spills or leaks to management and immediately initiate clean-up.
- Maintain a register of all incidents on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.

3.15 ECOSYSTEM AND BIODIVERSITY

Some exploration activities are intrusive in nature, although mostly with relatively low impact. New roads may be required to allow machinery to be moved to exploration targets and drill sites will need clearing. Employees involved with exploration may be involved with poaching and illegal collection of plant and animal materials. Poachers may also use the presence of exploration teams on farms, to pose as members of the team, in order to poach. Impacts may also be related to pollution of the environment. Human / wildlife interactions further present a risk to both the wildlife and the people involved.

Disturbed sites are prone to the rapid establishment of invasive plants.

Aerial surveys may cause distress in animals (game and livestock).

Desired Outcome: To prevent poaching, ecological damage and pollution

Actions.

Prevention:

- Educate all contracted and permanent employees on the value of biodiversity and the importance of protecting the environment from disturbance.
- Where possible, removal of trees, especially protected species and large trees, must be avoided. The necessary permits from the Directorate of Forestry of the MEFT must be obtained for removal of all protected species.
- Liaise with the land owner on routes to be followed where new roads should be made and whether such roads should be rehabilitated after exploration ends or be left as is for the owner's use.
- Areas to be cleared must first be inspected for nests and burrows and these should be avoided.
- Strict conditions prohibiting harvesting and poaching of fauna and flora should be part of employment contracts. This includes prohibitions or regulations on the collection of firewood.
- Procedures to deal with human-wildlife conflict should form part of employee training/induction. The unwarranted killing of potentially dangerous animals, or those perceived as dangerous, or animals typically feared due to superstitious reasons, should be strongly discouraged.
- The footprint of drill sites, their associated laydown areas and access routes, should be kept to the smallest area possible and movement of vehicles outside of these area must be prohibited.
- Where drill sites are levelled to create drill pads, topsoil (overburden) must be stored for rehabilitation purposes after drilling is complete and the site is decommissioned.
- Exploration equipment transferred from completely different habitats to the EPL area must be thoroughly cleaned to limit the potential transfer of alien species to the area.
- Restrict driving to designated areas and avoid off-road driving.
- Refer to section 3.11 for measures related to aerial surveys and its associated noise impacts.

Mitigation:

- Report any extraordinary animal sightings, conflict or incidents to the farm owner and MEFT.
- Report any suspicious people or dead animals, snares or traps encountered during exploration to the land owner.
- Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts from pollution.
- At campsites, prevent scavenging of any waste by fauna.
- Disciplinary actions to be taken against all employees failing to comply with contractual conditions related to poaching and the environment.
- Compacted areas can be lightly ripped to encourage vegetation establishment and to get rid of tracks.

- Topsoil should be returned to such sites in order to re-establish the seed bank.
- Alien invasive species should be eradicated from drill sites during follow-up visits to rehabilitated areas.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Forestry Act regulations
- Invader species eradication to be reported on.
- All information and reporting to be included in a bi-annual report.

3.16 DUST

Dust may be generated as a result of vehicles travelling on gravel roads, strong winds picking up dust in cleared areas, due to the specific drilling methods, only limited dust as a result of drilling.

Desired Outcome: To prevent any nuisance or health impacts as a result of dust.

Actions

Mitigation:

- Responsible driving speeds on gravel roads will limit dust generation.
- Road surfaces that become powdered due to heavy equipment must be rehabilitated to reduce dust.
- Dust masks as standard PPE for workers in situations with excessive dust.
- Implement dust suppression measures where possible and especially at drill sites close to public roads, if needed

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Health and Safety Regulations of the Labour Act
- Maintain a complaints register.
- Bi-annual reporting on complaints and actions taken to address complaints and prevent future occurrences.

3.17 WASTE

Various forms of waste will be produced during exploration activities. Waste may include hazardous waste associated with hydrocarbon products and chemicals, including soil and water contaminated with such products. Domestic waste will be generated by the workers. Sewage in chemical toilets will be produced. Waste presents a contamination risk and when not removed regularly may become a health and / or fire hazard and attract wild animals and scavengers. Due to the potential visual difference between drill cuttings and drill cores and the natural soil cover, it may be regarded as a type of waste.

Desired Outcome: To reduce the amount of waste produced, and prevent contamination, pollution and littering.

Actions

Prevention:

- Develop a waste management plan and educate workers on the importance of proper waste management.
- Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate.
- Ensure adequate waste storage facilities are available that will prevent waste from being blown away by wind or being scavenged (human and non-human) or attract vermin.
- Hazardous wastes such as used oil and oil/diesel contaminated soil or water must be contained.
- In the unlikely event of a french drain being erected for employees, it should adhere to the Department of Water Affairs' guideline documents for the siting and construction of such facilities.

Mitigation

- All waste must be removed from the drill sites and camps once drilling is complete. Waste should be disposed of at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers (e.g. oil containers) and contaminated materials (rugs, paper water and soil). Empty chemical containers must be destroyed in a way that would prevent reuse as a container after disposal.
- All drill cores as well as cuttings with a significantly different colour than the surface soil should be removed from site. Other cuttings can, in agreement with the land owner, be dispersed around the site and loosely raked to limit the visual impact or be applied for beneficial use to rehabilitate erosion ditches.
- Contents of chemical toilets must be removed from site and disposed of at a registered waste water treatment facility.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- Any complaints received regarding waste should be recorded with notes on action taken.
- All information and reporting to be included in a bi-annual report.

3.18 HERITAGE RESOURCES

Within the EPL, the chance of discovering of archaeologically or culturally important artefacts is very small. This is due to the overall lack in surface features, such as rocky hills and springs, that are typically associated with early human habitation. Should archaeologically or culturally important artefacts be discovered (e.g. unmarked graves, signs of early human habitation), it will have a positive academic value if preserved, but a negative impact if damaged.

Desired Outcome: To prevent the damage to, or destruction of, any archaeological, paleontological or culturally important (heritage) resources.

Actions

Prevention:

- Educate employees and contractors on what constitutes a possible heritage or archaeologically significant find and inform them to be vigilant for any extraordinary finds and to prevent any damage.

Mitigation:

- If and site or any other archaeologically important artefact is found during exploration, the "chance find procedure" must be implemented. In short, any work in that area must be halted, the area demarcated and the National Heritage Council informed.
- For any human remains, the Namibian Police must be informed as a first action.
- Work may only resume once the necessary permission is provided by the National Heritage Council.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Documenting and reporting of any incidents related to heritage, archaeological or paleontological resources.

3.19 UTILITIES AND INFRASTRUCTURE

Any damage caused to existing infrastructure and like fences, reservoirs, troughs, roads, etc. This includes damage/erosion of farm roads due to the movement of heavy machinery such as drill rigs to exploration sites. Borehole casings that becomes overgrown can present a danger to land owners if they drive off road and collide with it. This is not likely to happen as the EPL is very densely vegetated, making off-road driving nearly impossible.

Desired Outcome: No impact on utilities and infrastructure.

Actions

Prevention:

- The Proponent must determine exactly where infrastructure like pipelines are situated. Liaison with owners of the land or suppliers of services (if applicable) is essential.
- Damaged farm roads and associated erosion ditches must be repaired in accordance with pre-arranged agreements with the land owner. The use of drill cuttings for this purpose should be considered as this will also serve as drill site rehabilitation.
- The land owner must be informed of the exact positions of any borehole casings protruding above the ground.
- No camping or drilling in official road reserves unless permission been has been granted by Roads Authority.

Mitigation:

- Emergency procedures for corrective action available on file.

Responsible Body:

- Proponent
- Contractors
- Land owner or suppliers of services

Data Sources and Monitoring:

- A report should be compiled of all incidents that occurred and corrective action taken.

3.20 DECOMMISSIONING AND REHABILITATION

Exploration is typically a systematic process and decommissioning pertains to the removal of all equipment and abandonment of an exploration site, and moving on to the next site, until exploration is complete. Decommissioning and thus an ongoing process throughout exploration. As a pro-active approach, rehabilitation of each abandoned exploration site should occur as soon as possible after all equipment is removed. This will ensure more rapid vegetation re-establishment and limit the chances of erosion. It will also reduce visual impact of exploration and ensure all abandoned sites are safe. Rehabilitation measures and relevant mitigation of impacts as presented in sections 3.1 to section 3.19 remain valid for the decommissioning phase.

3.21 ENVIRONMENTAL MANAGEMENT SYSTEM

The Proponent could implement an Environmental Management System (EMS). An EMS is an internationally recognized and certified management system that will ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS would need to include the following elements:

- A stated environmental policy which sets the desired level of environmental performance;
- An environmental legal register;
- An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- Identification of environmental, safety and health training needs;
- An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy; and
- Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS.
- The EMP.

4 CONCLUSION

Mining is one of the main contributors to Namibia's gross domestic product and to employment. Mining, and to a lesser degree exploration activities, can often be a destructive process. As such environmental management forms a crucial part of responsible mining/exploration.

By implementing the EMP, negative impacts associated with exploration can successfully be mitigated while simultaneously enhancing the positive spinoffs. Implementing a safety, health, environment and quality (SHEQ) policy will contribute to effective management for prevention and mitigation of impacts. Pertinent legislation for the protection of the environment should be implemented. Groundwater and soil pollution must be prevented at all times. Fire prevention should be key and fire response plans must be in place and regular training provided. All staff must be made aware of the importance of biodiversity and the poaching or illegal harvesting of animal and plant products prohibited. Any waste produced must be removed from site and disposed of at an appropriate facility or re-used or recycled where possible. Hazardous waste must be disposed of at an approved hazardous waste disposal site. Rehabilitation of exploration sites must be performed in line with accepted standards.

The updated EMP should continue to be used as an on-site reference document for exploration activities. Parties responsible for transgressing of the EMP should be held responsible for any rehabilitation that may need to be undertaken. The Proponent could use an in-house EMS in conjunction with the EMP. All operational personnel must be taught the contents of these documents.

5 REFERENCES

Environmental Compliance Consultancy. 2022. Scoping report plus impact assessment for exploration activities on EPL 8403, Otjozondjupa Region, Namibia. Report No. ECC-88-390-REP-06-D

Appendix A: Environmental Clearance Certificate

ECC – 2200026 22tjXfM26

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

Votorantim Metals Namibia (Pty) Ltd
P. O. Box 97957 Windhoek, Namibia,

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

The proposed exploration of rare and base metals, industrial minerals, precious and semi-precious metals on EPL 8403, Otjozondjupa Region, Namibia

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
Private Bag 13306
WINDHOEK, NAMIBIA
12 DEC 2022
ENVIRONMENTAL COMMISSIONER
REPUBLIC OF NAMIBIA

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