CC/2024/07232

ENVIRONMENTAL SCOPING ASSESSMENT FOR THE PROPOSED SMALL SCALE MINING ACTIVITIES ON THE MINING CLAIMS (MCs) No. 76410 – 76417 LOCATED NORTHWEST OF MILE 108 IN THE ERONGO REGION ; NAMIBIA .

DOCUMENT VERSION:FINAL VERSION

ECC APPLICATION NUMBER : 006657

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NOVEMBER 2025

EXECUTIVE SUMMARY

Canoe Birch Investment CC (hereto referred to as the Proponent in this document) have applied for small-scale mining activities on Mining Claim No. 76410 – 76417. The mining Claims (MCs) are located about 25 km Northwest of Mile 108 in the Erongo region and the MCs covers a combined area of 158.513 hectars. The MCs falls within Dorob National Park .The proponent is interested in commodities such as Industrial Minerals (salt)

All small scale mining activities and other related activities are among the listed activities that may not be undertaken without an ECC, under the Environmental Impact Assessment (EIA) Regulations, Therefore, to ensure compliance ,the proponent appointed an independent environmental consultant, Savannah Environmental Consultant CC, to undertake the required Environmental Scoping Assessment (ESA) process and apply for the ECC on their behalf.

PROJECT DESCRIPTION

Once the ECC is granted, the proposed small-scale mining operation is anticipated to run for approximately three (±3) years and will involve a combination of non-invasive and invasive mining activities.

These activities will be implemented in two primary phases namely Non-Invasive Techniques and Invasive Techniques .

PUBLIC CONSULTATION

The public consultation process enabled the Environmental Consultant to identify potential impacts, mitigation measures, and project alternatives. Communication with Interested and Affected Parties (I&APs) was carried out through the circulation of a Background Information Document (BID) to pre-identified and newly registered I&APs, publication of notices in Windhoek observer and *New Era* (21 and 28 Octomber 2025). All inputs from the consultation, together with findings from the site visit and literature review, were integrated into the Environmental Scoping Assessment (ESA) Report and Environmental Management Plan (EMP).

POTENTIAL IMPACTS IDENTIFIED.

The following potential impacts are anticipated:

The proposed small scale mining activities are expected to generate positive socio-economic benefits, including employment creation, skills transfer, local procurement, and the stimulation of small businesses and regional economic development. However, potential negative impacts may arise, such as disturbance of grazing land, soil and habitat disruption, biodiversity loss, pollution of water and soils, and dust generation. Additional concerns include occupational health and safety risks, increased vehicular traffic, noise and vibration from drilling, possible archaeological or heritage impacts, and potential social nuisances or conflicts within local communities.

The potential negative impacts were assessed, and mitigation measures were provided accordingly in the EMP .

RECOMMENDATIONS

The Environmental Consultant is confident that the potential negative impacts associated with the proposed project can be effectively managed through the implementation of recommended mitigation measures. Proper monitoring and strict adherence to these measures will further ensure that the activities are undertaken in a sustainable and environmentally responsible manner.

DISCLAIMER

The findings and conclusions presented in this report were prepared in accordance with the methodologies outlined in the Scope of Work and the Environmental Management Act (EMA), 2007, which represent accepted practice for conducting an Environmental Impact Assessment (EIA). While due care was taken to identify recognised environmental conditions, certain site conditions may not have been identifiable within the scope of the assessment or based on available information.

The Consultant considers the information obtained from public consultations, interviews, and documentary reviews to be reliable. However, no warranty is made regarding the completeness or accuracy of information provided by external sources. The conclusions and findings are limited to the date of evaluation, and no additional warranties, expressed or implied, are provided. This report is also subject to the limitations inherent in historical documentation, record accuracy, and the recollections of individuals consulted.

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LIST OF ABBREVIATIONS

Abbreviation	Meaning
AMSL	Above Mean Sea Level
BID	Background Information Document
CV	Curriculum Vitae
DEAF	Department of Environmental Affairs and Forestry
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EDS	Excel Dynamic Solutions
ESA	Environmental Scoping Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
GG	Government Gazette
GN	Government Notice
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
PPE	Personal Protective Equipment
Reg	Regulation
S	Section
TOR	Terms of Reference

1 INTRODUCTION

1.1 Project Background

Canoe Birch Investment CC (hereto referred to as the Proponent in this document) have applied for small-scale mining activities on Mining Claim No. 76410 – 76417. The mining Claims (MCs) are located about 25 km Northwest of Mile 108 in the Erongo region and the MCs covers a combined area of 158.513 hacters as shown in figure 1. The MCs falls within Dorob National Park shown in Figure 1. The proponent is interested in commodities such as Industrial Minerals (salt). The approval of the MCs is, however, subject to an Environmental Clearance Certificate (ECC) as per the status of the MCs application on the Namibia Mines and Energy Cadastre Map Portal https://portals.landfolio.com/namibia/ ‘’pending ECC .

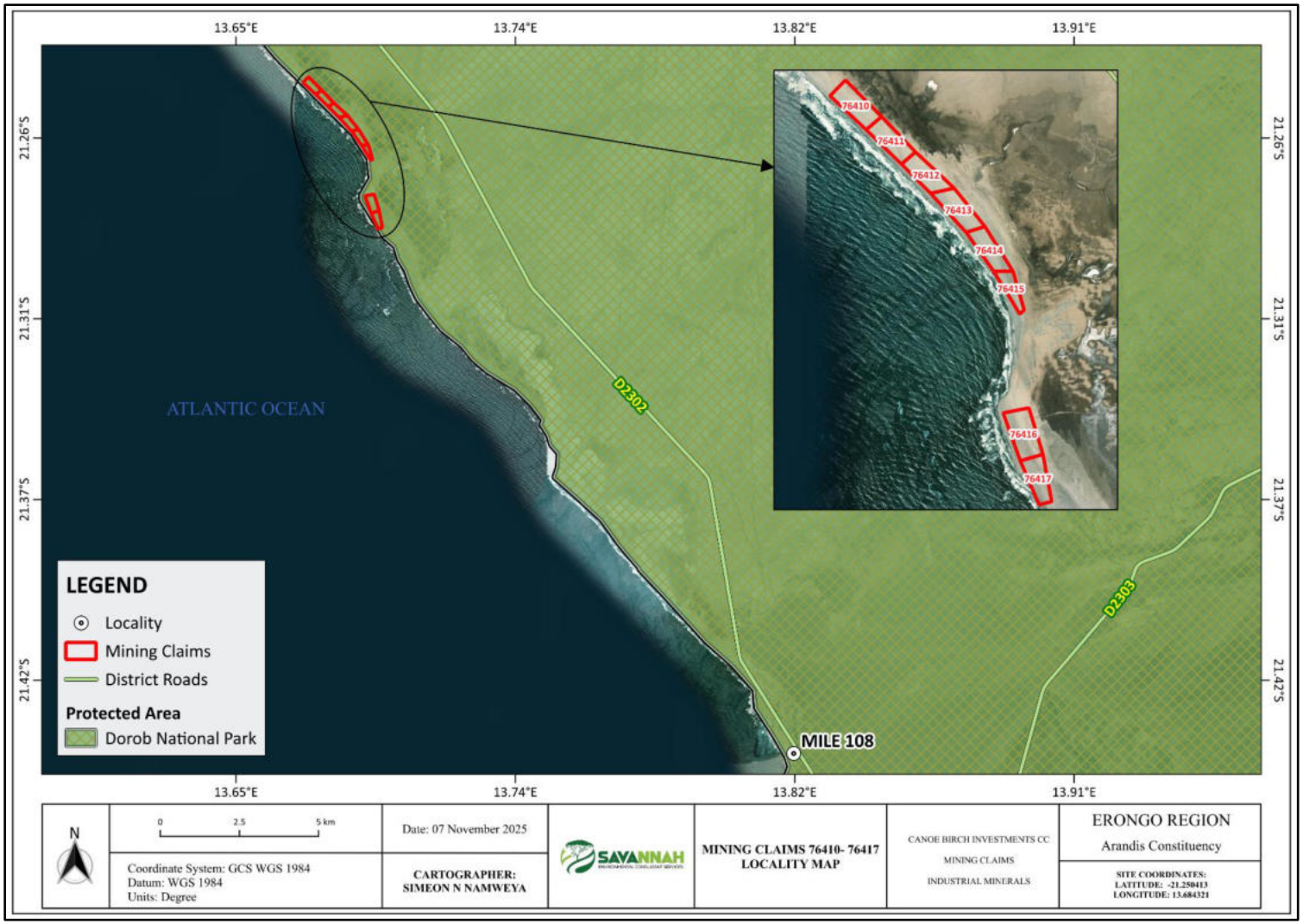

Figure 1: Locality Map Of The MCs

Section 27 (1) of the Environmental Management Act (EMA) (No. 7 of 2007) and its 2012 Environmental Impact Assessment (EIA) Regulations, provides a list of activities that may not be carried out without an EIA undertaken and an ECC obtained. Small scale mining activities are listed among activities that may not occur without an ECC. Therefore, no individuals or organizations may carry out small scale mining activities without an ECC being granted.

1.2 The Need for an ESA and Environmental Clearance Certificate (ECC)

Small scale mining of mineral resources are listed activities in the Environmental Impact Assessment (EIA) Regulations (2012) of the Environmental Management Act (EMA) No. 7 of 2007 that may not be undertaken without an Environmental Clearance Certificate (ECC). The activities that are relevant to the proposed project are as follows:

- *3.1 The construction of facilities for any process or activities that require a license, right, or other forms of authorization, and the renewal of a license, right, or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).*
- *3.2 Other forms of mining or extraction of any natural resources, whether regulated by law or not.*
- *3.3 Resource extraction, manipulation, conservation, and related activities.*

The purpose of the EIA Scoping Study and subsequent issuance of the ECC is therefore to ensure that the proposed project activities are undertaken in an environmentally & socially friendly and sustainable manner, through the effective implementation of recommended environmental management measures to minimize the adverse identified impacts while maximizing the positive impacts.

1.3 Terms of Reference, Scope of Works and Appointed EA Practitioner

There were no formal Terms of Reference (ToR) provided to Savannah Environmental Consultant Services by the Proponent. Thefore consultant, instead, relied on the requirements of the Environmental Management Act (No. 7 of 2007) (EMA) and its EIA Regulations (GN. No. 30 of 2012) to conduct the study.

The EIA project is headed by Ms. Aili Iipinge a qualified and experienced EAP. The consultation and reporting process are being carried out by Ms. Aili Iipinge. Ms. Iipinge s CV's are presented as an appendices.

1.4 Motivation for the Proposed Project

Small-scale mining activities are the most important contributor to Namibia's mineral sector , that makes to national economic growth and employment creation.Additionaly , it further strengthened by the socio-economic benefits associated with small-scale salt production. Salt mining to be specific, creates employment opportunities, supports local entrepreneurship, and stimulates related activities such as processing, packaging, and transport. These benefits are particularly valuable in coastal and rural areas where alternative livelihood options may be limited. Small-scale salt extraction can be conducted with minimal environmental disturbance when proper management and rehabilitation practices are followed, ensuring that economic gains are achieved sustainably. By integrating regulatory compliance, community benefits, and environmentally responsible methods, small-scale salt mining presents a viable and development-oriented activity for contributing to local and national socio-economic growth.

2 PROJECT DESCRIPTION

2.1 PROPOSED SMALL SCALE MINING ACTIVITY

Small scale mining activities is anticipated to last for about three years. Table 1 below shows the description of small scale mining acitities on the Mining Claim (MCs).It should be noted that this EIA study is for small scale mining activities on the mining claims only.

Table 1 below shows the description of the the small scale mining activities

Category	Activity	Description
Non-invasive activities	Site access via existing tracks	Using existing coastal tracks to reach salt pans without creating new routes or disturbing undisturbed areas.
	Visual assessment and mapping	Conducting surface inspections, drone surveys, and GPS mapping to record salt crust extent and elevation without disturbing the ground.
	Water quality and salinity testing	Taking small brine samples from natural pools using hand-held devices; no excavation or mechanical disturbance.
	Surface salt collection (loose crust)	Picking or scooping naturally detached salt crust without equipment penetrating the ground.
	Transport of bagged salt	Moving bagged salt using light vehicles on existing access routes without altering landforms or vegetation.
Invasive activities	Mechanised scraping of salt crust	Light mechanised equipment (e.g., mini front-loaders) used to scrape salt panes to expose fresh salt layers; creates shallow ground disturbance.
	Shallow mechanised excavation (<30–40 cm)	Using small earth-moving equipment to break compact salt layers, increasing productivity while maintaining minimal excavation depth.
	Levelling and clearing working areas	Removing loose debris or vegetation and preparing small areas for safe operation of mechanised equipment.

	Temporary stockpiling zones	Creating small temporary mounds of harvested salt on-site prior to washing, drying, or bagging.
	Rehabilitation of disturbed surfaces	Backfilling shallow scraped areas, smoothing ground, and restoring natural surface contours after mechanised harvesting.
Category	Activity	Description
Non-invasive activities	Site access via existing tracks	Using existing coastal tracks to reach salt pans without creating new routes or disturbing undisturbed areas.
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	Transport of bagged salt	Moving bagged salt using light vehicles on existing access routes without altering landforms or vegetation.

Other aspects of the proposed operational activities include:

2.1.1 Accessibility to Site

The proposed project site is easily is accessible a a D2303 road from Henties bay, which connects to the track roads, that goes through the MCs. All project-related vehicles will use existing roads to access the MCs.

2.1.2 Material and Equipment

The requirements of the small scale mining program in terms of vehicles and equipment include 4X4 vehicles, a drill rig, a drill pipe truck, water tanks, a diesel tank, a power generator, and a tented camp to accommodate the crew. Equipment and vehicles will be stored at a designated area near the accommodation site or a storage site established.

2.1.3 Services and Infrastructure

- **Water:** The estimated monthly water consumption is at 4,500 liters. This includes water for drinking, sanitation, cooking, dust control (if necessary), as well as washing of equipment.
- **Power supply:** Power required during the operation phase will be provided by diesel generators. About 1500 liters of diesel will be used per day.
- **Fuel (diesel for generators and other equipment):** The fuel (diesel) required for operational activities / equipment will be stored in a tank mounted on a mobile trailer. Drip trays will be readily available and monitored to ensure that accidental fuel spills are cleaned up as soon as they have been detected/observed. Fuel may also be stored in a bunded diesel bowser on site, and in jerry cans placed on plastic sheeting to avoid unnecessary contamination of soils.

2.1.4 Waste Management

- **Sewage Management:**
  Mobile chemical ablution facilities will be provided on-site. Sewage waste will be managed and disposed of in accordance with the manufacturer's instructions to ensure compliance with health and environmental standards.
- **Solid Waste Management:**
  Adequate waste bins and containers will be made available at all mining sites and campsites. Collected waste will be stored safely and transported for disposal at the nearest approved waste management facility.
- **Hazardous Waste Management:**
  Hazardous waste, including used fuel and oils, will be carefully stored in standardized, leak-proof containers. These will be transported to and disposed of at an approved hazardous waste management facility located in the nearest town (Hentiesbay /Swakopmund).

2.1.5 Health and Safety Measures

- All project personnel will be provided with adequate and appropriate Personal Protective Equipment (PPE).
- A minimum of two well-stocked first aid kits will be available on-site at all times.
- Fire extinguishers will be readily available in vehicles, at sites, and at campsites to mitigate risks of accidental fire outbreaks.

2.1.6 Accommodation

The crew/project personnel will be accommodated in a camp site set up In Henties bay .

2.2 Decommissioning and Rehabilitation Phase

Once the small scale mining actitivities cease , the Proponent will need to put site rehabilitation measures in place. Decommissioning and rehabilitation are primarily reinforced through a decommissioning and rehabilitation plan, which consists of safety, health, environmental, and contingency aspects. An unfavorable economic situation or unconvincing results might force the Proponent to cease the small scale mining program before the predicted closure. Therefore, it is best practice for the Proponent to ensure that the project activities cease in an environmentally friendly manner and the sites are rehabilitated.

3 PROJECT ALTERNATIVES

Alternatives are defined as the “different means of meeting the general purpose and requirements of the activity” (EMA, 2007). This section highlights the different ways in which the project can be undertaken and identifies alternatives that may be the most practical, but least damaging to the environment.

Once the alternatives have been established, these are examined by asking the following three questions:

- What alternatives are technically and economically feasible?
- What are the environmental effects associated with the feasible alternatives?
- What is the rationale for selecting the preferred alternative?

3.1 Types of Alternatives Considered

3.1.1 The "No-go" Alternative

The “no action” alternative implies that the status quo remains. Should the proposal small scale mining activity be discontinued, none of the potential impacts (positive and negative) identified would occur. If the proposed project is to be discontinued, the current land use for the proposed site would remain unchanged.

This no-go option is considered and a comparative assessment of the environmental and socio-economic impacts of the “no action” alternative, is undertaken to establish what benefits might be lost if the project is not implemented.

3.2 Services Infrastructure

Alternatives were considered for different supporting infrastructures to ensure that the most feasible options were selected. The technological, economic, and environmental limitations were considered to select the most feasible option. The alternatives considered in this regard are presented in table 2.

Table 2 :The presentation of service infrastructure alternatives considered for the project activities

Category of	Alternatives Considered	Justification for the selected option

Infrastructure		
Ablution facilities	Install a fixed facility with a septic tank -Portable facilities with a septic tank	-To minimize rehabilitation costs, portable facilities were selected as the best option.
Water supply	-Bring water from elsewhere -Abstract from local existing or new boreholes	-The project water will be sourced from the Municipality and other nearby reliable water suppliers (s) (for drilling and dust suppression). Drinking water will be supplied from shops in Henties bay.
Fuel storage	-Trailer-mounted diesel tank -Fixed bunded fuel tank	-During small scale mining activities, use a trailer-mounted diesel tank for fuel storage due to great mobility requirements during mining phase.
Power supply	-Diesel generator set, and if considered, solar power.	-Diesel and or solar power are the most practical & economically viable options for mining activities.
Site administration office	-Erect dismountable prefabricated units -Fixed structures	-Favoured due to: (a) Ease of installation, (b) Low installation costs, and (c) Ease of dismantling & moving.

4 LEGAL FRAMEWORK: LEGISLATION, POLICIES, AND GUIDELINES

This section outlines the relevant legal frame works that the proponent should consider once the ECC of the proposed project is issued .The legislations included or identified in this document, need to be honored by the proponent, during the course of the project. The legal requirements provided here are those that are required for the proposed small scale mining activities are presented in table 3 below.

Table 3 Regulatory framework applicable to the project

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
The Constitution of the Republic of Namibia, 1990, as amended	The Constitution of the Republic of Namibia (1990 as amended) addresses matters relating to environmental protection and sustainable development. Article 91(c) defines the functions of the Ombudsman to include: "…the duty to investigate complaints concerning the over- utilization of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia…" Article 95(l) commits the state to actively promoting and maintaining the welfare of the people by adopting policies aimed at: "…Natural resources situated in the soil and on the subsoil, the internal waters, in the sea, in the continental shelf, and in the exclusive economic zone are property of the State."	By implementing the environmental management plan, the establishment will be compliant with the constitution in terms of environmental management and sustainability. Ecological sustainability will be the main priority for the proposed development.

Environmental Management Act, 2007	Section 27: Requires Environmental Impact Assessments (EIAs) for activities that may impact the environment. Section 34: Requires environmental clearance certificates for activities impacting the environment.	Measures outlined in the EMP to mitigate environmental impacts during mining activities should be honored. Proponent should comply to all mitigation actions.
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	Section 52(1) (a) requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder. Section 54 requires a written notice to be submitted to the Mining Commissioner if the holder of a mineral license intends to abandon the mineral license area. Section 68 stipulates that an application for an MCs shall contain the particulars of the condition of, and any existing damage to, the environment in the area to which the application relates and an estimate of the effect that the proposed prospecting operations may have on the environment and the proposed steps to be taken to prevent or minimize any such effect. Section 91 requires that rehabilitation measures be included in an application for a mineral license.	The Proponent should enter into a written agreement with landowners before carrying out the small scale mining activities. The Proponent should assess the impact on the receiving environment. . The Proponent may not carry out small scale mining activities within the areas limited by Section 52 (1) of this Act.

Nature Conservation Amendment Act, No. 3 of 2017	National Parks are established and gazetted per the Nature Conservation Ordinance, 1975 (4 of 1975), as amended. The Ordinance provides a legal framework concerning the permission to enter a state-protected area, as well as requirements for individuals damaging objects (geological, ethnological, archaeological, and historical) within a protected area. Although the Ordinance does not specifically refer to mining as an activity within a protected area (PA) or recreational area (RA), it does restrict access to PAs and prohibit certain acts therein, as well as the purposes for which permission to enter game parks and nature reserves may be granted.	The Proponent will be required to enhance the conservation of biodiversity and the maintenance of the ecological integrity of protected areas (Dorob National Park) and other State land.
The Parks and Wildlife Management Bill of 2008	Aims to provide a regulatory framework for the protection, conservation, and rehabilitation of species and ecosystems, the sustainable use and sustainable management of Indigenous biological resources, and the management of protected areas, to conserve biodiversity and contribute to national development.	
Mine Health & Safety Regulations, 10th Draft	Makes provision for the health and safety of persons employed or otherwise present in the mineral license area. These deal with, among other matters, clothing and devices; design, use, operation, supervision, and control of machinery; fencing and guards; and safety measures	The Proponent should comply with all these regulations concerning their employees.

	during repairs and maintenance.	
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess [sic] or store any fuel except under the authority of a license or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 liters or less in any container kept at a place outside a local authority area"	The Proponent should obtain the necessary authorization from the Petroleum Affairs Directorate at the MIME for the storage of fuel on-site in volumes of 600 liters or more.
The Regional Councils Act (No. 22 of 1992)	This Act sets out the conditions under which Regional Councils must be elected and administer each delineated region. From a land use and project planning point of view, their duties include, as described in section 28 "to undertake the planning of the development of the region for which it has been established with a view to physical, social and economic characteristics, urbanization patterns, natural resources, economic development potential, infrastructure, land utilization pattern and sensitivity of the natural environment.	The relevant Regional Councils are I&APs and must be consulted during the Environmental Assessment (EA) process. The project site falls under the Erongo Regional Council; therefore, they should be consulted.

Water Resources Management Act (No 11 of 2013) and 2023 Water Regulations	The Act provides for the management, protection, development, use, and conservation of water resources; provides for the regulation and monitoring of water services, and provides for incidental matters. The fundamental principles set out in Part 6: Section 59: Protection of aquifers states that the operator of an artificial recharge scheme must ensure that at all times the aquifer is protected against any form of pollution, including pollution caused due to operational activities during aquifer recharge. -Part 8: water pollution control, specifically Section 66: Application for license to discharge effluent or construct or operate wastewater treatment facility or waste disposal site.	The protection (both quality and quantity/abstraction) of water resources should be a priority. Relevant permits to discharge effluent should be applied for and obtained from the Water Affairs Department at the Ministry of Agriculture, Fisheries, Water & Land Reform (MAFWLR)
National Heritage Act No. 27 of 2004	To provide for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.	The Proponent should ensure compliance with these Act's requirements. The necessary management measures and related permitting requirements must be taken. This is done by consulting with the National Heritage Council of Namibia. A Chance Finds Procedure provided to the Draft EMP should be implemented upon discovery of archaeological
The National Monuments Act (No. 28 of 1969)	The Act enables the proclamation of national monuments and protects archaeological sites.	

		and heritage resources.
Soil Conservation Act (No 76 of 1969)	The Act makes provision for the prevention and control of soil erosion and the protection, improvement, and conservation of soil, vegetation, and water supply sources and resources, through directives declared by the Minister.	Duty of care must be applied to soil conservation and management measures must be included in the EMP.
Forestry Act (Act No. 12 of 2001	The Act provides for the management and use of forests and forest products. Section 22. (1) provides: "Unless otherwise authorized by this Act, or by a license issued under subsection (3), no person shall on any land which is not part of a surveyed erven of a local authority area as defined in section 1 of the Local Authorities Act, 1992 (Act No. 23 of 1992) cut, destroy or remove - (a) vegetation which is on a dune or drifting sand or a gully unless the cutting, destruction or removal is done to stabilize the sand or gully; or (b) any living tree, bush or shrub growing within 100 m of a river, stream or watercourse."	The proponent will apply for the relevant permit under this Act if it becomes necessary from the MEFT's Directorate of Forestry in Outjo.
Public Health Act (No. 36 of 1919)	Section 119 states that "no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health."	The Proponent and all its employees should ensure compliance with the provisions of these legal instruments.

Public and Environmental Health Act No. 1 of 2015	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	
Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding the health and safety of laborers.	
Atmospheric Pollution Prevention Ordinance (1976)	This ordinance provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, apart from East Caprivi, is proclaimed as a controlled area for section 4(1) (a) of the ordinance.	The proposed project and related activities should be undertaken in such a way that they do not pollute or compromise the surrounding air quality. Mitigation measures should be put in place and implemented.
Hazardous Substance Ordinance, No. 14 of 1974	The ordinance provides for the control of toxic substances. It covers manufacture, sale, use, disposal, and dumping as well as import and export. Although the environmental aspects are not explicitly stated, the ordinance provides for the importing, storage, and handling.	The Proponent should handle and manage the storage and use of hazardous substances on site so that they do not harm or compromise the site environment.
Road Traffic and Transport Act, No. 22 of 1999	The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters	Mitigation measures should be provided for, if the roads and traffic impact cannot be avoided, the relevant permits must be applied for.

	incidental thereto.	
Labour Act (No. 6 of 1992)	The Ministry of Labour, Industrial Relations and Employment Creation is aimed at ensuring harmonious labor relations through promoting social justice, occupational health and safety, and enhanced labor market services for the benefit of all Namibians. This ministry ensures the effective implementation of the Labour Act No. 6 of 1992.	The Proponent should ensure that the small scale mining activities do not compromise the safety and welfare of workers.

4.2 Other Application International Statutes (Treaties and Conventions) and Policies

The other international statutes, such as policies, standards, and conventions that may govern the project activities, are provided under Table 4.

Table 4 Other international treaties and conventions governing the proposed activities of the MCs.

Statue	Relevant Provisions	Implications for the Project / Requirements
The United Nations Convention to Combat Desertification (UNCCD) 1992	Address land degradation in arid regions to contribute to the conservation and sustainable use of biodiversity and the mitigation of climate change. The convention's objective is to forge a global partnership to reverse and prevent desertification/land degradation and to mitigate the effects of drought in affected	The project activities should not be undertaken in such that contributes to desertification.

	areas to support poverty reduction and environmental sustainability, United Nations Convention.	
Convention on Biological Diversity 1992	Regulate or manage biological resources important for the conservation of biological diversity, whether within or outside protected areas, to ensure their conservation and sustainable use. Promote the protection of ecosystems, natural habitats, and the maintenance of viable populations of species in natural surroundings.	The removal of vegetation cover and destruction of natural habitats should be avoided and, where not possible, minimized.
Stockholm Declaration on the Human Environment, Stockholm (1972)	It recognizes 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.	Protection of natural resources and prevention of any form of pollution.
Equator Principles	A financial industry benchmark for determining, assessing, and managing environmental and social risk in projects (August 2013). The Equator Principles have been developed in conjunction with the International Finance Corporation (IFC) to establish an International Standard with which companies must comply to apply for approved funding by Equator Principles Financial Institutions (EPFIs). The principles apply to all new project financings globally across all sectors.	These principles are an attempt to: '…encourage the development of socially responsible projects, which subscribe to appropriately responsible environmental management practices with a minimum negative impact on project-affected ecosystems and community-based upliftment and empowering interactions.'

5 ENVIRONMENTAL BASELINE

The proposed small scale mining programme will be undertaken within defined environmental and social settings. Establishing the pre-project baseline conditions provides essential background information on the current state of the environment and allows for future projections of potential changes following the proposed activities on the MCs. This process further assists the Environmental Assessment Practitioner (EAP) in identifying environmentally sensitive features that require protection through the implementation of appropriate mitigation measures and monitoring actions.

The baseline information presented in this report is derived from multiple sources, including published studies and technical reports related to the Mile 108 as well as HentiesBay, Erongo Region. Additional data was obtained by the Consultant during the site visit, ensuring that both secondary literature and primary field observations inform the environmental assessment.

5.1 Biophysical Environment

5.1.1 Climate

To optimize the prospects of success for the proposed activities, it is vital to consider the local climate patterns in the study area. By selecting favorable weather conditions, any adverse effects caused by extreme temperatures or heavy rainfall can be minimized, ensuring safe and efficient operations.

The project area is located at an elevation of 0 meters above sea level,with a Subtropical desert climate (Classification: BWh). The district's yearly temperature is 19.83ºC and it is -4.63% lower than Namibia's averages. The project area typically receives about 9.4 m of precipitation and has 18.54 rainy days (5.08% of the time) annually.

5.1.2 Landscape and Topography

The MCs falls within the Coastal Plain, this area is characterized by plain sand .

Figure 2 the general overview of the proposed MCs

Geologicaly, the MCs falls within the Swakop group the Godowana formation with the Euric soil , this soil type are medium or fine textured soils of actively eroding landscape, the thin layers lying directly above the rock surfaces from which they formed. These soils never reach depth of more than 50 cm (Mendelsohn, 2003).

The MCs falls near the sea as shown in figure 3 b3low , and no water source are found within the MCs.

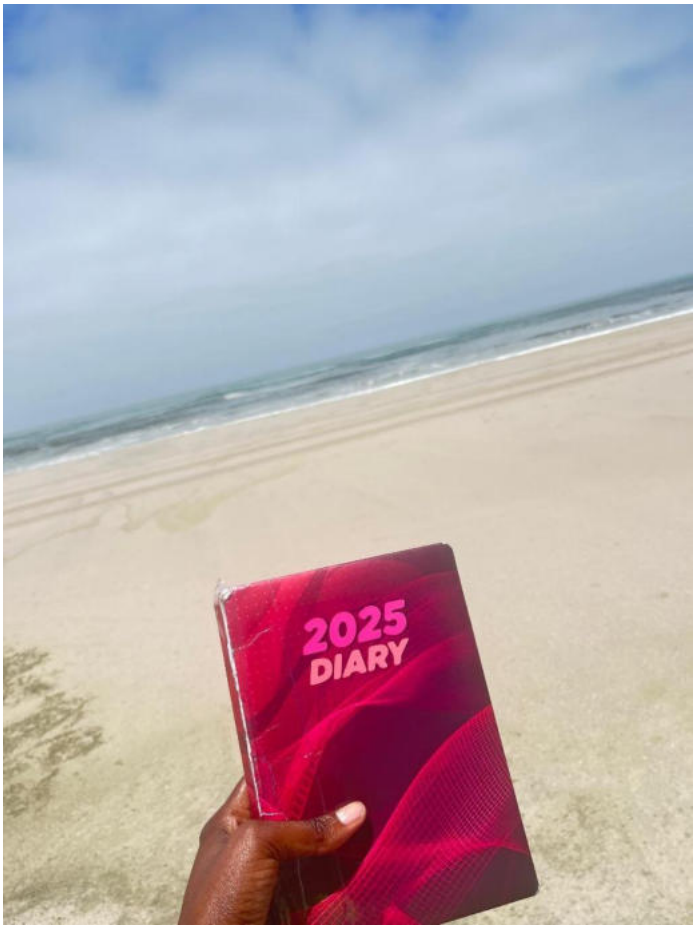

Figure 3 proximity of the MCs to the sea

5.2 Socioeconomic Status of Fransfontein Settlement

The population of Henties Bay , information derived from the Namibia Population and Housing Census (NSA, 2011), shows that the Project area Erongo Region Population Population aged 60 years and above 150, 809 6% Population aged 5 to 14 years 17% Population aged 15 to 59 years 67%.

The project area lies near Cape Cross, is a protected area preserved by the government of Namibia under the Cape Cross Seal Reserve. The Cape Cross Seal Reserve stretches between the coastal towns of Swakopmund and Henties Bay within the West Coast National Park, a 200-km stretch of coastline between the Swakop and Ugab rivers.The reserve is a sanctuary for the world's largest breeding colony of South African fur seals, with up to 210,000 seals present during the breeding season in November and December. Sustainable seal harvesting takes place in the reserve annually under the auspices of the Ministry of Fisheries and Marine Resources, which also sets the quota of animals to be harvested. About 100 workers live at

Cape Cross. As a result, a police station, customs, and post office were established at the settlement. A railway, the first in the country was built to cross the salt pan and transport workers.

There are no petrol facilities and there is very limited water available at Cape Cross. There are campsites along the coast, at Mile 14, Mile 72, and Mile 108, operated by Namibia Wildlife Resorts providing basic amenities.

5.4 Surrounding Land Uses

The Proponent is required to secure a signed agreement from the affected Dorob National Parks managements to gain access to the areas of interest investigations as per Section 52 of the Minerals (Prospecting and Mining) Act No. 33 of 1992 and Section 2.2.3 of the Minerals Policy of Namibia.

1. *Section 52 (1) The holder of a mineral licence shall not exercise any rights conferred upon such holder by this Act or under any terms and conditions of such mineral license –*

    (a) *In, on, or under any and until such time as such holder has entered into an agreement in writing with the owner of such land containing terms and conditions relating to the payment of compensation, or the owner of such land has in writing waved any right to such compensation and has submitted a copy of such agreement or waiver to the Commissioner*.

Section 2.2.3 of the Draft Minerals Policy of Namibia states that the License Holder and/or mineral currently have to negotiate a contract with landowners to gain access for small scale mining purposes.

6 PUBLIC CONSULTATION PROCESS

Public consultation is an important component of an Environmental Assessment (EA) process. It provides potential Interested and Affected Parties (I&APs) with an opportunity to comment on and raise any issues relevant to the project for consideration as part of the assessment process, thus assisting the Environmental Assessment Practitioner (EAP) in identifying all potential impacts and what extent further investigations are necessary. Public consultation can also aid in the process of identifying possible mitigation measures. Public consultation for this scoping study has been done in accordance with the EMA and its EIA Regulations.

6.1 Pre-identified and Registered Interested and Affected Parties (I&APs)

Relevant and applicable national, regional, and local authorities, local leaders, and other interested members of the public were identified. Pre-identified I&APs were contacted directly, while other parties who contacted the Consultant after project advertisement notices in the newspapers, were registered as I&APs upon their request.

6.2 Communication with I&APs

Regulation 21 of the EIA Regulations details the steps to be taken during a public consultation process and these have been used in guiding this process. Communication with I&APs with regard to the proposed development was facilitated through the following means and in this order:

- A Background Information Document (BID) containing brief information about the proposed works was compiled and emailed to pre-identified I&APs, and upon request to all new registered I&APs;
- Notices for the Environmental Scoping Assessment of the proposed project were published in Windhoek observer and New Era newspapers on the21 and 28 Octomber 2025) respectively, briefly explaining the activity and its locality, inviting members of the public to register as I&APs and submit their comments/concerns.
- A consultation meeting was scheduled as well as the site visit ./

Figure 4 site notices placed at the notice board

6.3 Feedback and Issues Raised by the Stakeholders (I&APs)

Some key issues were raised by I&APs during the consultation period, and these issues have been recorded and incorporated in the Scoping Report and EMP. The summarized key issues are presented bellow

1. The proponent must inform the Ministry of Environment , Forestry and Tourism , the parks department once the ECC is issued .

7 IMPACT IDENTIFICATION, ASSESSMENT AND MITIGATION MEASURES

7.1 Impact Identification

Proposed developments/activities are usually associated with different potential positive and/or negative impacts. For an environmental assessment, the focus is placed mainly on the negative impacts. This is done to ensure that these impacts are addressed by providing adequate mitigation measures such that an impact's significance is brought under control, while maximizing the positive impacts of the development. The potential positive and negative impacts that have been identified from the prospecting activities are listed as follow:

Impact Category	Description
Positive Impacts	
Employment Creation	Generation of job opportunities for local communities.
Economic Development	Stimulation of local and regional economies.
Investment Opportunities	Attraction of new investments and infrastructure development.
Local Business Support	Increased procurement from nearby suppliers and service providers.
Negative Impacts	
Biodiversity Loss	Habitat disturbance affecting of flora and fauna.
Soil and Water Impact	Risk of soil erosion, sedimentation, or contamination of water resources.
Air Quality (Dust)	Dust generation from clearing, transport, or blasting activities.
Occupational Health & Safety	Exposure to mining hazards and poor safety measures for workers.
Traffic and Infrastructure	Damage to local roads, increased risk of accidents due to heavy vehicle use.
Noise and Vibrations	Nuisance to residents and wildlife from mining operations.
Waste Management Issues	Potential pollution due to improper disposal of solid or hazardous waste.
Cultural Heritage Impact	Risk of damaging archaeological or culturally sensitive sites.
Social Conflicts	Land use disputes, noise complaints, or community unrest.
Tourism	Disturbance to the land visual and scenic of the area

7.2 Impact Assessment Methodology

7.2.1 Impact Assessment Methodology

The Environmental Assessment process primarily ensures that potential impacts that may occur from project activity are identified and addressed with environmentally cautious approaches and legal compliance. The impact assessment method used for this project is following Namibia's Environmental Management Act (No. 7 of 2007) and its Regulations of 2012, as well as the International Finance Corporation (IFC) Performance Standards.

The identified impacts were assessed in terms of scale/extent (spatial scale), duration (temporal scale), magnitude (severity), and probability (likelihood of occurring), as presented in Table 6.

To enable a scientific approach to the determination of the environmental significance, a numerical value is linked to each rating scale. This methodology ensures uniformity and that potential impacts can be addressed in a standard manner so that a wide range of impacts are comparable. It is assumed that an assessment of the significance of a potential impact is a good indicator of the risk associated with such an impact. The following process will be applied to each potential impact:

- Provision of a brief explanation of the impact,
- Assessment of the pre-mitigation significance of the impact; and
- Description of recommended mitigation measures.

The recommended mitigation measures prescribed for each of the potential impacts contribute towards the attainment of environmentally sustainable operational conditions of the project for various features of the biophysical and social environment. The following criteria (in Table 6) were applied in this impact assessment:

Table 6: Criteria used for impact assessment (extent, duration, intensity, and probability)

The Criteria used to assess the potential negative impacts.				
The extent or (spatial scale) - extent is an indication of the physical and spatial scale of the impact.				
Low (1)	**Low/Medium (2)**	**Medium (3)**	**Medium/High (4)**	**High (5)**

The impact is localized within the site boundary: Site only	The impact is beyond the site boundary: Local	Impacts felt within adjacent biophysical and social environments: Regional	Impact widespread far beyond the site boundary: Regional	Impact extends to the National or over international boundaries
Duration- Duration refers to the timeframe over which the impact is expected to occur, measured over the lifetime of the project				
Low (1)	**Low/Medium (2)**	**Medium (3)**	**Medium/High (4)**	**High (5)**
The Criteria used to assess the potential negative impacts.				
Immediate mitigating measures, immediate progress	The impact is quickly reversible, and short- term impacts (0-5 years)	Reversible over time; medium-term (5-15 years)	Impact is long-term	Long-term; beyond closure; permanent; irreplaceable or irretrievable commitment of resources
Intensity, Magnitude/severity - Intensity refers to the degree or magnitude to which the impact alters the functioning of an element of the environment. This is a qualitative type of criteria.				
H-(10)	**M/H-(8)**	**M-(6)**	**M/L-(4)**	**L-(2)**
Very high deterioration, high quantity of deaths, injury or illness / total loss of habitat, total alteration of ecological processes, extinction of rare species	Substantial deterioration, death, illness or injury, loss of habitat/diversity or resource, severe alteration, or disturbance of important	Moderate deterioration, discomfort, partial loss of habitat/biodiversity or resource, moderate alteration	Low deterioration, slight noticeable alteration in habitat and biodiversity. Little loss in species numbers	Minor deterioration, nuisance or irritation, minor change in species/habitat/diversity or resource, no or very little quality deterioration.

	processes			
Probability of occurrence - Probability describes the likelihood of the impacts occurring. This determination is based on previous experience with similar projects and/or based on professional judgment.				
Low (1)	**Medium/Low (2)**	**Medium (3)**	**Medium/High (4)**	**High (5)**
Improbable; low likelihood; seldom. No known risk or vulnerability to natural or induced hazards.	Likely to occur from time to time. Low risk or vulnerability to natural or induced hazards	Possible, distinct possibility, frequent. Low to medium risk or vulnerability to natural or induced hazards.	Probable if mitigating measures are not implemented. Medium risk of vulnerability to natural or induced hazards.	Definite (regardless of preventative measures), highly likely, continuous. High risk or vulnerability to natural or induced hazards.

7.2.2 Impact Significance

Impact significance is determined through a synthesis of the above impact characteristics. The significance of the impact "without mitigation" is the main determinant of the nature and degree of mitigation required. As stated in the introduction to this chapter, for this assessment, the significance of the impact without prescribed mitigation actions was measured.

Once the above factors (Table 7-1) have been ranked for each potential impact, the impact significance of each is assessed using the following formula:

$$SP = (magnitude + duration + scale) \times probability$$

The maximum value per potential impact is 100 significance points (SP). Potential impacts were rated as high, moderate, or low significance, based on the following significance rating scale (Table 7).

Table 7 : Impact significance rating scale

Significance	Environmental Significance Points	Color Code
High (positive)	>60	H
Medium (positive)	30 to 60	M
Low (positive)	<30	L
Neutral	0	N
Low (negative)	>-30	L
Medium (negative)	-30 to -60	M
High (negative)	>-60	H

For an impact with a significance rating of high, mitigation measures are recommended to reduce the impact to a low or medium significance rating, provided that the impact with a medium significance rating can be sufficiently controlled with the recommended mitigation measures. To maintain a low or medium significance rating, monitoring is recommended for a period to enable the confirmation of the significance of the impact as low or medium and under control.

The assessment of the project phases is done for both pre-mitigation (before implementing any mitigation) and post-mitigation (after mitigations are implemented). The objective of the mitigation measures is to first avoid the risk, and if the risk cannot be avoided, the mitigation measures to minimize the impact are recommended. Once the mitigation measures have been applied, the identified risk will be of low significance.

7.2.3 Description and Assessment of Potential Impacts

The potential impacts of the proposed project activities are described and assessed in Table 7. The management and mitigation measures in the form of management action plans are provided in the Draft EMP.

Assessment of Potential Negative Impacts

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
Positive Impacts											
Employment creation	Although temporary, the project activities will create employment from sampling throughout to drilling. This will include casual laborers, technical assistants, cooks, etc.	L / M- 2	L / M - 2	L / M - 4	L - 1	L - 8	M / H - 4	H - 5	M - 6	H - 5	H - 75
Empowerme nt of local businesses	Procurement of local goods and services for carrying out small scale mining acrivities by small and medium businesses will promote local entrepreneurship, empowerment, and local economic development (income generation during the project).	L / M- 2	L / M - 2	L / M - 4	L / M - 2	L - 16	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44
Negative (Adverse) Impacts											
Physical disturbance to the site soils	The excavations and land clearing to enable the siting of project structures and equipment will potentially result in soil disturbance through target site establishment, access road creation, and unnecessary off-	M - 3	M / H - 4	L / M - 4	M / H - 4	M – 44	L / M - 2	L / M - 2	L / M - 4	L / M - 2	L - 16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	road driving. This will, however, be a short-term and localized impact.										
Impact on the sensitive Biodiversity: Wild Fauna and Flora Illegal hunting (poaching)	<u>Fauna:</u> The presence and movement of the small scale mining workforce and the operation of project equipment and heavy vehicles would disturb wildlife in the area. There is also a potential illegal hunting (poaching) of local wildlife by project-related workers. This could lead to a loss	M: -3	M: -3	M: -6	M / H: 4	M: -48	L / M: - 2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	or a reduction of specific faunal species, which also impacts tourism in the community (area).										
Conflict between the Proponent and existing land uses	The fact that there are existing land uses such as tourist activities, there might be a conflict in terms of landuse if one significantly infringes another's activities. Therefore, a good understanding should be made between the	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	proponent and the farmers on certain areas of the farms. Without any mitigation measures, the significance will be medium to high, but upon implementing the measures, the significance will be reduced to low.										
Air Quality: Dust Generation	There is a potential impact of dust emanating from mining activities such as trenching There is also a potential dust issue from site access roads when transporting mining equipment and supplies to and from the site. The impact is considered short-term and localized as small scale mining activities are carried out over specified durations at selected sites only. Hence, the impact is manageable with mitigation measures.	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12
Visual impact: Scenic view of the area for Tourism	Small scale mining activities, such trenching and holes) as well as project heavy vehicles, equipment, and machinery close to or along roads, may potentially become a	M - 3	M - 3	M - 6	M / H - 4	M – 48	L / M: - 2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	visual nuisance (impacting scenic views), especially tourists and other road users in the vicinity. This impact is considered minimal as the project is of small scale impact.										
Water Resources Demand and Use	There will be a need for water for dust suppression. However, water will be carted on site , purchase elsewhere	M - 3	M - 3	M - 6	M / H - 4	M – 48	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	water in industry-standard water reservoirs/tanks onsite and refill as required. Therefore, the impact of the project activities on the local water resources would be very low to none. Moreover, the required water would also be dependent on the duration of the small scale mining works										
Soil and Water Resources Pollution	The proposed activities are associated with a variety of potential pollution sources (i.e., lubricants, fuel, and wastewater) that may contaminate/pollute soils and eventually groundwater and surface water, if not handled properly. The anticipated potential source of pollution to water resources from the project activities would be hydrocarbons (oil) from project vehicles, machinery, equipment, and potential wastewater/effluent from mining -related activities. The spills (depending on volumes spilled on the soils)	M: -3	M: -3	M: -6	M / H: 4	M: -48	L / M: - 2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	from this machinery, vehicles, and equipment could be washed into surface water bodies such as rivers and streams. However, it should be noted that the scale and extent/footprint of the activities where potential sources of pollution will be handled are relatively small. Therefore, the impact will be moderately low.										
Waste Generation (Environmental pollution)	Waste types such as solid, wastewater, and possibly hazardous will be produced onsite during mining. If the generated waste is not disposed of responsibly, land pollution may occur on the MCs or around the site. If solid waste such as paper and plastics is not properly stored or just thrown into the environment (littering), these may be consumed by wild animals in the area, which could be detrimental to their health. Improper handling, storage, and disposal of hydrocarbon products and hazardous materials at the site may lead to	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L - 1	L - 1	L - 2	L / M - 2	L - 8

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	soil and groundwater contamination in the case of spills and leakages.										
Occupational and Community Health and Safety Risks	Project personnel (workers) involved in the activities may be exposed to health and safety risks. Other potential risks to both people and wildlife within the MCs are unfenced or unsecured trenches (or not backfilled) after completing the mining activities. Unsecured trenches could pose a risk of people and or wildlife falling into the open trenches, leading to injuries. The use of heavy equipment, and the presence of hydrocarbons on sites may result in accidental fire outbreaks. This could pose a safety risk to the project personnel and locals, too.	M - 3	M - 3	M - 6	M / H - 4	M – 48	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12
Vehicular Traffic Safety	The local roads are the main transportation routes for all vehicular movement in the MCs area.	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	There would be a potential slight increase in traffic flow, , due to the delivery of supplies, goods, and services to the site at some point. However, there will only be a single heavy truck, 1 to 2 medium vehicles, and 2 to 3 small vehicles frequenting the area										
Noise and vibration from drilling	There is a potential for noise from certain activities (trenching), which may be a nuisance to the community / tourist within the Dorob National Park. The excessive noise and vibrations without any protective measures in place can also be a health risk to workers on site as well as a nuisance to	M - 3	M - 3	M - 6	M / H - 4	M – 48	L - 1	L / M - 2	L - 2	L / M -2	L - 10

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	Animals within the national park. The equipment used for drilling on site is of medium size, and the noise level is bound to be limited to the site only. Thus, the impact likelihood is minimal.										
Archaeological and Heritage Resources	The area within the MCs has LOW Archaeological significance, and this is based on the surface walk-over conducted, which recorded no few rock shelter features, rock outcrops/boulders, and graves.	M / H - 4	M - 3	M - 6	M - 3	M – 39	L - 1	L / M - 2	L - 2	L / M -2	L - 10

8 RECOMMENDATIONS AND CONCLUSION

8.1 Recommendations

The potential impacts of the proposed project activities were identified and assessed, and appropriate mitigation measures were recommended for implementation by the Proponent, their contractors, and project-related employees for significant adverse (negative) impacts rated as medium. These mitigation measures aim to reduce the impact severity to an acceptable level and prevent or minimize any negative effects on the environment, local communities, and cultural resources.

The concerns raised by registered Interested and Affected Parties (I&APs) were carefully considered, incorporated into this report, and addressed through the recommended management and mitigation measures. Most potential impacts were rated as medium in significance, but the effective implementation of these measures will minimize their severity, reducing the rating to low. To ensure this outcome and maintain low impact ratings, the Proponent, or their appointed Environmental Control Officer (ECO), should monitor the implementation of the proposed management and mitigation measures.

The Environmental Consultant is confident that the potential negative impacts associated with the proposed project activities can be managed and mitigated by effective implementation of the recommended management and mitigation measures, and with more effort and commitment put towards monitoring the implementation of these measures.

It is, therefore, recommended that in the case of ECC issuance for this project, the proposed small scale mining activities may be granted an ECC, provided that:

- All the management and mitigation measures provided herein are effectively and progressively implemented.
- All required permits, licenses, and approvals for the proposed activities should be obtained as required. These include permits and licenses for land use agreements, and service provision agreements (water provision) to explore and ensure compliance with these specific legal requirements.
- Transparency in communication and continued engagement with landowners , as well as other stakeholders, should be maintained before and throughout the project.
- The Proponent, their project workers, or contractors comply with the legal requirements

governing their project and its associated activities and ensure that project permits and or approvals required to undertake specific site activities are obtained and renewed as stipulated by the issuing authorities.

- Site areas where small scale mining activities have ceased are rehabilitated, as far as practicable, to their pre-mining state. This includes the leveling of stockpiled topsoil, backfilling of trenches.
- The EMP implementation onsite should be checked and done by the responsible team member onsite (Environmental Control Officer), and audited by an Independent Environmental Consultant on a bi-annual basis to compile Environmental Monitoring (Audit) Reports. These reports are to be submitted to the Environmental Commissioner at the DEAF. This will be required by the Environmental Commissioner (as part of the ECC conditions).

Conclusion

In conclusion, to maintain the desirable rating and ensure that the potential impacts are under control, the implementation of management and mitigation measures should be monitored by their Environmental Control Officer (ECO) and audited by an Independent Environmental Consultant on a bi-annual basis. The monitoring of this implementation will not only be done to maintain the reduced impacts' rating or maintain a low rating, but also to ensure that all potential impacts that might arise during implementation are properly identified in time and addressed immediately.

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