

Environmental Management Plan (EMP)

The proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia



ECC Application No.:

APP-006781

Proponent:

Telfs Investments (Pty) Ltd

P.O. Box 8912 Swakopmund, Namibia

April 2026

DOCUMENT INFORMATION

Title: Environmental Management Plan (EMP) for the proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia

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SERJA'S STATEMENT OF INDEPENDENCE

As the Appointed Environmental Consultant to undertake the Environmental Scoping Assessment (ESA) Study and Preparation of this EMP for the proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Serja Hydrogeo-Environmental Consultants cc declare that we:

- do not have, to our knowledge, any information or relationship with Telfs Investments (Pty) Ltd (the Proponent), the Ministry of Environment, Forestry and Tourism (MEFT)'s Department of Environmental Affairs and Forestry (DEAF) or the Competent Authority (Ministry of Industries, Mines and Energy (MIME)) that may reasonably have potential of influencing the outcome of this Environmental Assessment and the subsequent Environmental Clearance Certificate applied for.
- have knowledge of and experience in conducting environmental assessments, the Environmental Management Act (EMA) No. 7 of 2007, and its 2012 Environmental Impact Assessment (EIA) Regulation, as well as other relevant national and international legislation, guidelines, policies, and standards that govern the proposed project as presented herein.
- have performed work related to the ECC application in an objective manner, even if the results in views and findings, or some of these may not be favourable to the Proponent.
- have complied with the EMA and other relevant regulations, guidelines, and other applicable laws as listed in this document.
- declare that we do not have and will not have any involvement or financial interest in the undertaking/implementation of the proposed project, other than remuneration (professional fees) for work performed to conduct the ESA and apply for the ECC in terms of the EIA Regulations' requirement as an Environmental Assessment Practitioner (EAP).

Disclaimer: Serja Hydrogeo-Environmental Consultants will not be held responsible for any omissions and inconsistencies that may result from information that was not available at the time this document was prepared and submitted for evaluation.



.....
Signature:

Fredrika N. Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Date: April 2026

TABLE OF CONTENTS

DOCUMENT INFORMATION	i
TABLE OF CONTENTS	iii
LIST OF FIGURES	iv
LIST OF TABLES	iv
LIST OF APPENDICES	iv
LIST OF ABBREVIATIONS	iv
1 INTRODUCTION	1
1.1 Project Background and Location	1
1.2 Purpose of the Draft Environmental Management Plan (EMP)	2
2 BRIEF DESCRIPTION OF THE PROPOSED PROJECT ACTIVITIES	3
2.1 Crystalliser Pond Development	4
2.1.1 Wash water tailings dam	5
2.1.2 Bitterns discharge pipeline	5
2.2 Evaporation Area	6
2.3 Salt Processing	6
2.4 Duration and Frequency of Salt Production	7
2.5 Key Project Activities and Facilities	7
2.6 Project Resources and Services Infrastructure	8
2.6.1 Human resources	8
2.6.2 Project Crew Accommodation	8
2.6.3 Water Supply	8
2.6.4 Fuel Supply (machinery and equipment)	8
2.6.5 Fuel supply (for personnel use to cook)	8
2.6.6 Accessibility (roads)	8
2.6.7 Waste management	9
2.6.8 Occupational Health and Safety	10
2.7 Decommissioning and Rehabilitation of Disturbed Sites	10
3 LEGAL FRAMEWORK: PERMITTING AND LICENSES	11
4 EMP IMPLEMENTATION RESPONSIBILITIES	13
5 ENVIRONMENTAL MANAGEMENT MEASURES	15
5.1 Key identified Potential negative Impacts	15
5.2 Cumulative Impacts Associated with the Proposed Project	16
5.3 Environmental Management Measures and Rehabilitation of Disturbed Sites	17
5.3.1 Planning and Design Phase Environmental Measures	18

5.3.2	Operational (Salt Production) Phase Environmental Measures	21
5.3.3	Site Rehabilitation Measures	37
6	GRIEVANCE REDRESSAL MECHANISM (GRM) (ADOPTED FROM SOLNAM ENERGY SUPPLEMENTARY ESIA BY PALLETT AND SHAGAMA, 2024).....	39
6.1	Objectives of the Grievance Mechanism	39
6.2	Proposed Grievance Procedures	39
6.2.1	Categorization of Stakeholder (Interested & Affected Party (I&AP))	39
6.2.2	Categorization of Grievances	40
6.2.3	Grievances Submission and Recording	42
6.2.4	Monitoring of the Grievance Mechanism	43
6.2.5	Management of Information	44

LIST OF FIGURES

Figure 1-1: Locality map of the MC75982-75991 near Cape Cross in the Erongo Region	1
Figure 1-2: Locality map with the significant land use and constituency overlain by MC75982-75991.....	2
Figure 2-1: Locality map with the significant land use and constituency overlain by MC75982-75991.....	4
Figure 2-2: The access road to the MC75982-75991 site (saltpan site).....	9
Figure 2-3: The map of the dual-purpose purple line (flood protection levee/internal haulage road) connecting the Telfs/project crystallisers to the processing plant in the ML-11.....	9

LIST OF TABLES

Table 3-1: List of legal requirements and permits for the activities on the mining claims	11
Table 4-1: The EMP implementation responsibilities for the proposed salt production activities	14
Table 5-1: Environmental management and mitigation measures for the planning of the salt production (mining) activities	18
Table 5-2: Environmental management and mitigation measures for the Salt Production activities.....	22
Table 5-3: The Mitigation measures for site rehabilitation	37
Table 6-1: Types (categories) of grievances.....	40

LIST OF APPENDICES

Appendix 1: Chance Finds Procedure (Archaeology & Heritage Action Plan)

LIST OF ABBREVIATIONS

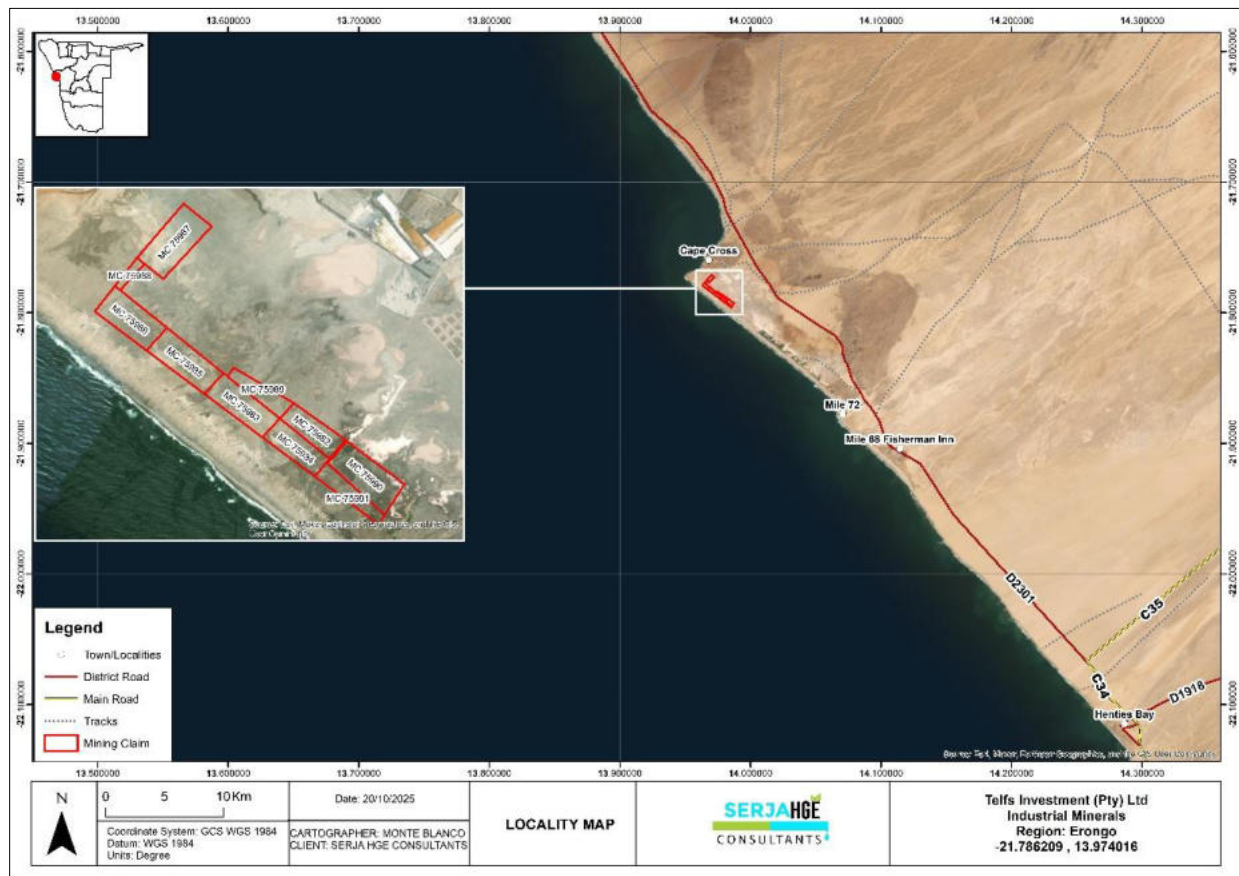
AHIA	Archaeological & Heritage Impact Assessment
CCSR:	Cape Cross Seal Reserve
DEAF:	Department of Environmental Affairs and Forestry
DWNP:	Directorate of Wildlife and National Parks

DWA:	Department of Water Affairs
EAP:	Environmental Assessment Practitioner
ECC:	Environmental Clearance Certificate
EIA:	Environmental Impact Assessment
EMA:	Environmental Management Act
EMP:	Environmental Management Plan
ESA:	Environmental Scoping Assessment
GG:	Government Gazette
GN:	Government Notice
GRM:	Grievance Redressal Mechanism
I&APs:	Interested and Affected Parties
MAFWLR:	Ministry of Agriculture, Fisheries, Water, and Land Reform
MC:	Mining Claim
MEFT:	Ministry of Environment, Forestry and Tourism
MIME:	Ministry of Industries, Mines, and Energy
ML:	Mining License
NaCl:	Sodium Chloride
NHC:	National Heritage Council (NHC) of Namibia
PPE:	Personal Protective Equipment
Reg. S:	Regulation, Section
SHE Officer:	Safety, Health & Environment Officer

1 INTRODUCTION

1.1 Project Background and Location

Telfs Investments (Pty) Ltd (hereinafter referred to as the Proponent) applied to the Ministry of Industries, Mines, and Energy (MIME) on the 3rd of April 2025 for the rights to mine industrial minerals (salt production) within ten (10) mining claims (MCs) located about 2km south of Cape Cross Settlement (Figure 1-1) and bordering the Dorob National Park in the Arandis Constituency of the Erongo Region (see Figure 1-2). The MCs are MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (collectively referred to as MC75982-75991). The MCs are still under application on the Namibia MIME Portal <https://portal.mme.gov.na/page/MapPublic>. The ten MCs cover a combined area of 123.0962 hectares (ha), which constitutes 10.0233ha, 13.5702ha, 10.926ha, 14.7486ha, 14.4709ha, 17.3727ha, 2.0384ha, 7.4275ha, 24.2953ha, and 8.2233ha, for each mining claim, respectively. However, the approval of the MCs' applications with MIME and subsequent operations (salt production) is conditional on the issuance of an Environmental Clearance Certificate (ECC).



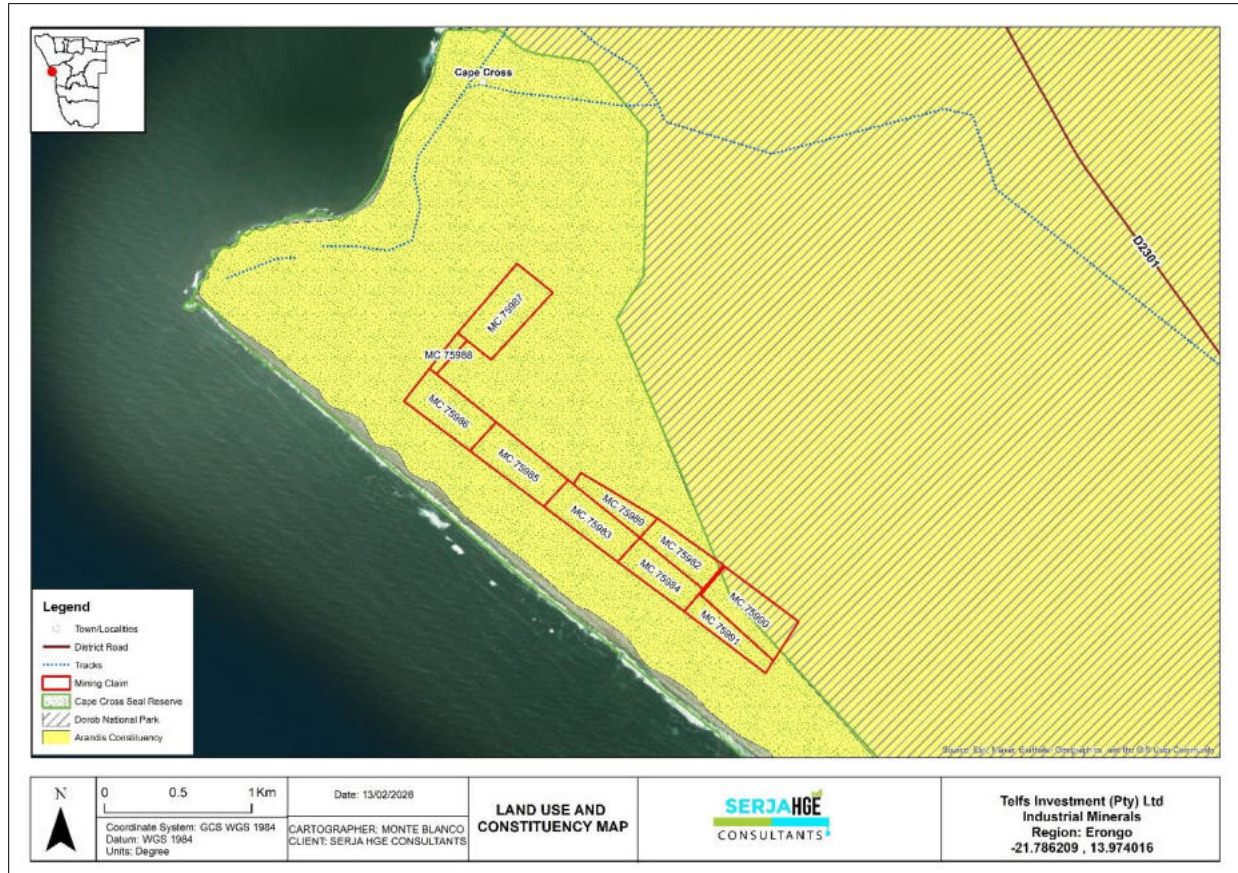


Figure 1-2: Locality map with the significant land use and constituency overlain by MC75982-75991

1.2 Purpose of the Draft Environmental Management Plan (EMP)

The Draft EMP was developed following Regulation 8(j) of the EIA Regulations (2012), which states that it should be included as part of the Environmental Assessment (EA) scoping report. A **'Management Plan'** is defined as:

"...a plan that describes how activities that may have significant environmental effects on the environment are to be mitigated, controlled, and monitored."

An EMP is one of the most important outputs of the EA process as it synthesizes all the proposed management & mitigation, and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the EA process and the required mitigation measures to be implemented during the mining stage. It is important to note that an EMP is a statutory document, and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and can be amended to adapt to address project changes and/or environmental conditions and feedback from compliance monitoring.

The EMP is therefore aimed at guiding environmental management throughout the different phases of the proposed salt mining activities, namely: planning, salt production (mining), and decommissioning & rehabilitation phase:

- **Planning phase** – Preparation of all the administrative and technical requirements needed for the actual works on the ground. The planning would entail obtaining the necessary permitting and authorization from relevant national and local stakeholders (such as affected land custodians/users), facilitating the recruitment and goods and services procurement processes, etc.
- **Mining (salt production) phase** – The stage during which the salt will be produced on the mining claims. It should be noted that there will be no processing of the salt on the mining claims, as processing will be done at the Plant situated on an active Mining License (ML) No.11, located about 10km southeast of the site (MCs).
- **Decommissioning and Rehabilitation** – The stage during which the Proponent will decide to cease salt production activities on the mining claims and will rehabilitate disturbed sites.

2 BRIEF DESCRIPTION OF THE PROPOSED PROJECT ACTIVITIES

The proposed project activities will entail the mining of industrial minerals (salt production) within crystallisers enclosed within the boundaries of ten (10) Mining Claims (MCs), MC75982-75991. The brine infiltrates the constructed crystallisers from the existing brine resource within the salt pan. The conceptual crystallizer layout map of the site is shown in Figure 2-1.



Figure 2-1: Locality map with the significant land use and constituency overlain by MC75982-75991

As a mitigation measure to the continued conservation and protection of biodiversity (fauna) in the host environment, the crystallisers will be constructed in such a way that allows the movement of mammals. The natural brine ponds nearer the sea will not be affected because the Proponent will leave a buffer area between the crystallisers and the natural brine ponds.

The information on the project activities has been sourced from the 2018 EIA Report for the proposed Cape Cross Salt Project by Matthew Hemming of SLR Environmental Consulting, and these are presented as follows:

2.1 Crystalliser Pond Development

Some long, narrow, rectangular crystalliser ponds will be excavated in the Cape Cross Salt Pan (within the 10 Telfs' Investments mining claims). The ponds will be approximately 50m wide and will vary in length from 150m. To create crystalliser ponds, the top layer of sand and gypsum will be removed, and the underlying rock salt will be excavated to a depth of about 750mm below the surface.

Moreover, the overburden will be used to create crystalliser-pond embankments and to build roads and dykes around the crystallisers. This is a one-off process to prepare the ground for the creation of crystalliser ponds in the top layer of rock salt. This is a one-off process to prepare the ground for the creation of crystalliser ponds in the top layer of rock salt. The rock salt beneath the sandy overburden will be mined to establish the crystalliser ponds. This rock salt will be sold as is or stockpiled for later processing in the wash plant. As with the removal of the overburden, the mining of the rock salt will be a one-off process. The resulting excavations will form the crystalliser ponds in which salt will crystallise from inflowing brine (Hemming, 2018). The crystalliser pond development will also entail a wash water tailings dam and a bittern's discharge pipeline.

2.1.1 Wash water tailings dam

A 'tailings' storage facility for the insoluble matter, which will be washed from the raw salt, will utilise the constructed wash plant in Mining Licence No.11 (hereafter referred to as ML-11). The total volume of the facility will eventually be approximately 21,350m³. The wash water is recycled in a dam within the salt pan. As the wash water will consist of only brine and suspended salt and silt material, the floor of this reservoir will not be lined, as any brine lost through the floor will re-enter the brine resource. Any settled fines may be dredged from time to time and stored on the side of the wash water dam. The cyclones extract much of the fines that come out of the washer, and this mineral waste likewise is stored at the sides of the reservoir and used in the maintenance of roads, crystalliser walls, etc.

The majority of the mineral waste material stems from the initial processing of the rock salt, which contains sand, silt, and clay when the salt is removed from the pan to create the crystallisers. This waste is disposed of in the same way as the wash water, dam, and cyclone fines.

2.1.2 Bitterns discharge pipeline

During solar salt production, "bitterns" (water high in magnesium salts) can be generated. Once the magnesium salt levels in the wash brine reach threshold levels, the bitterns would require discharge to the sea. A pipeline will eventually be constructed from the wash water tailings dam, across the beach to the sea. The pipe infrastructure will be above ground.

The discharge will be onto the beach at the high-water mark, as in the case of the salt works at Walvis Bay and Swakopmund. A maximum diameter of 30cm will be used for the pipeline for discharging the bitterns onto the beach at the high-water mark.

2.2 Evaporation Area

Due to the solar evaporation of water from the crystalliser ponds, there will be a natural draw of water from the lagoons' brine pits and or lagoons towards the crystalliser ponds (and similarly from the ocean to the brine pits or lagoon). The water that is drawn towards the crystalliser ponds will be of lower salinity, i.e., this water is less salty than the brine filtering into the ponds through the underlying rock salt. This "fresher" water will dissolve the salts in the rock salt on route to the crystalliser ponds and ensure that concentrated brine is entering the crystalliser ponds.

Thus, an 'evaporation area' is required between the crystalliser ponds and the lagoons. The water through the evaporation area will create natural channels of movement (dissolution channels) towards the ponds through the dissolving of underlying rock salt, creating minor "sinkhole" channels. The exposure of these channels to air will serve to increase evaporation of the inflowing water, thereby increasing its salinity prior to entering the crystalliser ponds. No construction activities will take place in this area between the crystallisers and the beach berm. Potentially, the planned crystallisers on the seaside of the MCs may be shortened to increase the evaporation area.

2.3 Salt Processing

The initial material removed from the pan surface to create the sunken crystalliser will be processed at the Plant situated on the active ML-11, located about 10km southeast of the site (MCs). Therefore, no salt processing will be carried out on-site (within the boundaries of the MCs). The offsite processing plant on ML-11 is fully equipped with crushers (i.e., primary and secondary), conveyors, a wash plant, a drying and stockpiling area, and a bagging plant. The plant has pre-fabricated offices and sanitation facilities that are regularly emptied by "honeysuckers," and the sewage is disposed of at the Henties Bay Municipal sewage facility.

According to Hemming (2018), the processing of the harvested salt will involve crushing, washing, and 'drying' to produce salt that meets the market specifications. As the processing intensity affects the grade of salt produced and the resultant market, the production of high-grade salt corresponds with higher losses than the washing to general food-grade salt specifications. The project will produce chemical-grade salt with sodium chloride (NaCl) >99.7%, human consumption salt, which will be iodized to market specifications, and salt with >97% NaCl for de-icing and animal feed applications.

2.4 Duration and Frequency of Salt Production

Should the ECC be issued by the MEFT, the site set up (construction) in preparation for the operational (production) phase is anticipated to take between 12 and 36 months. The operations are planned for ten (10) years, but could potentially continue indefinitely, which is dependent on the availability of the source materials (brine). The main factor that could hinder or impact the brine availability is sea level rise. However, mitigations for this potential outcome could be devised to sustain the solar salt production.

The frequency of extraction of salt from the crystallisers will depend on the evaporation process. However, a first full harvest of salt from the crystalliser pond on the salt pan could be achieved after three years have passed.

2.5 Key Project Activities and Facilities

The construction of the salt works and associated facilities (i.e., site offices, sanitation, etc.) involved and will involve various combinations of the following:

- Earthworks: Ground clearing activities, soil excavation, cut and fill
- Rock salt mining
- Civil works: Foundation excavations
- Building activities
- Storage and handling of material: sand, rock, cement, chemicals, additives in cement
- Water utilisation
- Mixing of concrete
- Operation and movement of construction vehicles and machinery
- Refuelling of equipment
- Painting, grinding, and welding
- Handling, storage, and disposal of hazardous waste: Hydrocarbon wastes, empty paint containers, cement bags, chemical additives for cement, containers, contaminated PPE and other wastes, redundant concrete, and transportation of hazardous waste to the Walvis Bay facility.
- Handling, storage, and disposal of non-hazardous waste: Domestic waste, steel, wood, other construction wastes, transportation of non-hazardous waste to the Henties Bay solid waste management facility.
- Provision and operation of sanitation facilities
- Diesel generator and diesel tanks.

Equipment and vehicles will be stored at a designated area near the accommodation site (campsite) or a storage site established within the project site area (boundaries).

2.6 Project Resources and Services Infrastructure

The following services and infrastructure, as provided below, will be required for the project activities.

2.6.1 Human resources

The anticipated staff (project workers) for the site will entail a general manager, site/operations or production manager, foreman, Harvest & Haul Crew (drivers, operators, and labourers), mechanic, electrician, operators, cooks, security, etc. The current range of operational staff complement for the operations across the partnered companies operating in collaboration with one another is between fifteen (15) and twenty-five (25). Cumulatively, these numbers represent the maximum staff complements that would exist for the collaborative operations across multiple mineral licences (MCs and MLs).

2.6.2 Project Crew Accommodation

Some of the project staff who are required to be on-site will be accommodated in a prefabricated campsite that is already in existence at the Cape Cross. The rest of the staff (particularly those from Henties Bay) reside in Henties Bay and commute to the site by bus (3 bus trips per day) or private vehicle daily, as necessary. The camp has a kitchen that provides food for the resident (camp) staff. Furthermore, the camp is equipped with a French drain system to manage sewage.

2.6.3 Water Supply

The water for the project will be used for domestic use (drinking, cooking, and washing). It is anticipated that this water will be purchased from NamWater directly or the Henties Bay Municipality and tanked to the site from Henties Bay (upon reaching a water supply agreement with the Municipality/NamWater).

2.6.4 Fuel Supply (machinery and equipment)

Diesel will be used for machinery and equipment, and a fuel generator. A trailer-mounted and bunded fuel tank of about 10,000 litres will be on-site to ensure an uninterrupted fuel supply to the project.

2.6.5 Fuel supply (for personnel use to cook)

The Proponent will provide firewood or fuel to be used for food preparation by resident staff (at the camp). No firewood will be collected onsite or in the surrounding general area.

2.6.6 Accessibility (roads)

The nearest proclaimed road to the mining claims' site is the C34 from Mile 72/Henties Bay towards Cape Cross. Therefore, the C34 will be used to access the area and then turn off to the left to the salt pans using the existing single dirt track (used by existing operators neighbouring Telfs Investments' MCs). The information board to Cape Cross and the access (dirt) road to the project site in the Cape Cross Seal Reserve are as shown in Figure 2-2.

Added to that, there will be an internal haulage road from the crystallisers (at the mining claims), i.e., across the salt pan to the processing plant in ML-11. The flood protection levee will serve a dual purpose of being both the haulage road route and a flood protection levee, as shown in Figure 2-3.



Figure 2-2: The access road to the MC75982-75991 site (saltpan site)

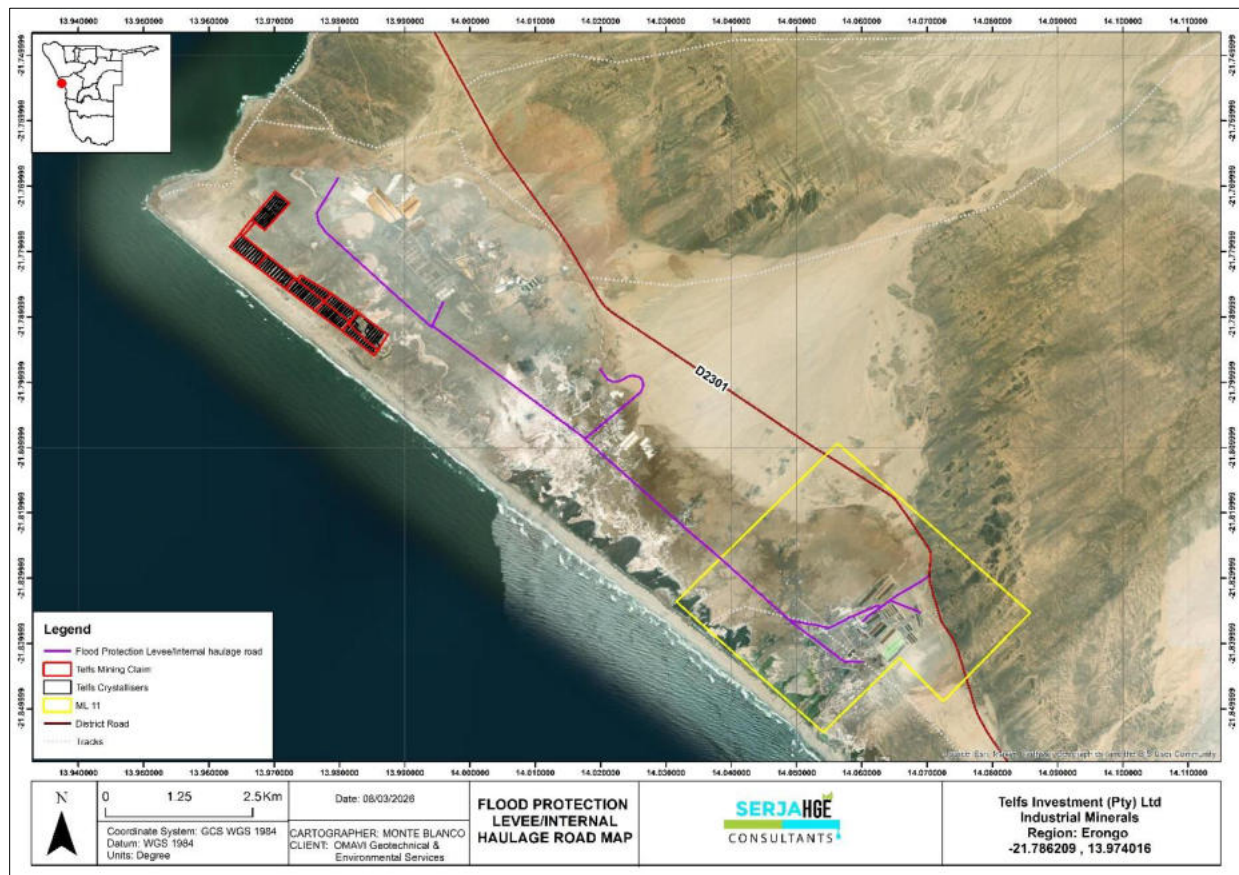


Figure 2-3: The map of the dual-purpose purple line (flood protection levee/internal haulage road) connecting the Telfs/project crystallisers to the processing plant in the ML-11

2.6.7 Waste management

The onsite waste types will be managed as follows:

- Sewage: Two portable ablution facilities with septic tanks will be provided on site and emptied according to manufacturers' instructions.
- General and domestic waste: Solid waste containers will be made available at both production sites and the campsite for waste storage, sorting, and later disposal at the Henties Bay dumpsite.
- Hazardous waste: All vehicles, machinery, and fuel-consuming equipment will be provided with drip trays to capture potential fuel spills and waste oils. The waste fuel/oils will be carefully stored in a standardized container to be disposed of at the nearest approved hazardous waste management facility in Walvis Bay, which is the nearest to the site area.

2.6.8 Occupational Health and Safety

The following measures will be implemented onsite to ensure safety and security:

- Adequate and appropriate Personal Protective Equipment (PPE) will be provided to all project personnel while on and working at the site, including site visitors. A fully-equipped first aid kit will be readily available on-site.
- First aid: A first aid kit will be readily available on-site to attend to potential minor injuries, while major injuries will need to be attended to further by transporting the injured to the nearest health centre for treatment (in Henties Bay and, if necessary, to Swakopmund). At least 2 personnel will be trained to administer first aid.
- Potential Accidental Fire Outbreaks: A minimum of two well-serviced fire extinguishers will be readily available on the site throughout the project operations.

2.7 Decommissioning and Rehabilitation of Disturbed Sites

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. Therefore, it is best practice for the Proponent to ensure the project activities are ceased in an environmentally friendly manner, and the site is rehabilitated by:

- Dismantling and removal of campsites and associated infrastructures from the project site and area,
- Carrying away all project equipment and vehicles, and
- Cleaning up of site working areas and transporting the recently generated waste to the nearby approved waste management facility (as per agreement with the facility operator/owner),

Further decommissioning and rehabilitation practice onsite will include:

- Backfilling of trenches used for the project, if any, to ensure that they do not pose a risk to both people and wild animals in the area, and
- Levelling of stockpiled materials. This will be done to ensure that the disturbed land sites are left as close to their original state as possible.

3 LEGAL FRAMEWORK: PERMITTING AND LICENSES

The Proponent has the responsibility to ensure that the salt production (mining) activities, as well as the EA process) conform to the principles of the EMA and must ensure that employees act in accordance with such principles. Table 3-1 below lists the requirements of an EMP as stipulated by Section 8 (e) of the EIA Regulations, primarily on specific approvals and permits that may be required for the activities required of the salt production activities.

Table 3-1: List of legal requirements and permits for the activities on the mining claims

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts be subject to an environmental assessment process (Section 27). Details the principles that are to guide all EAs.	The EMA and its regulations should inform and guide this EA process. Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue. Similarly, should the Proponent decide to transfer or amend the ECC, an application to do so should be submitted to the Environmental Commissioner.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	Details requirements for public consultation within a given environmental assessment process (GN 30 S21). Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).	Contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT), Office of the Environmental Commissioner Mr. Timoteus Mufeti Tel: +264 61 284 2701
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	Section 48 (3): To enable the Minister to consider any application referred to in section 47, the Minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice.	The Proponent should ensure that all necessary permits/authorization for the mining claims are obtained from the Ministry of Industries, Mines and Energy (MME). Contact person and details at the MIME (Mining Commissioner) Mrs. Isabella Chirchir Tel: +264 61 284 8251.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Nature Conservation Amendment Act, No. 3 of 2017	The management of protected areas, to conserve biodiversity, should be promoted. Thus, consent to undertake salt mining activities should be obtained from the management of the conservation areas.	The mining claims are within the Cape Cross Seal Reserve (CCSR). Therefore, the MEFT's Directorate of Wildlife and National Parks (DNWP), with the focus on the CCSR unit, should be engaged before and throughout the project implementation. The consent should be obtained from the DNWP management, and land use agreements should be entered into before salt production activities start. Agreements and conditions set by the CCSR management should be complied with throughout the project cycle. MEFT: Directorate of Wildlife and National Parks Mr. Ben Kahuure: Director Tel: +264 81 952 8696 Ms. Renathe Dausas (MEFT: Cape Cross Seal Reserve (CCSR) Official) Tel: +264 81 209 5151
The Parks and Wildlife Management Bill of 2008		
Water Resources Management Act (No 11 of 2013)	Ensure that the water resources of Namibia are managed, developed, used, conserved, and protected in a manner that is. There is no anticipated direct groundwater abstraction on site or by the Proponent, since water will be supplied by NamWater.	The effluent (wastewater) discharge permit should be applied for from the Ministry of Agriculture, Fisheries, Water, and Land Reform (MAFWLR) Department of Water Affairs (DWA) Contact: Mr. Franciskus Witbooi Division: Water Policy and Water Law Administration Division Tel: +264 61 208 7158
	In case of plans to discharge effluent into the environment, an effluent discharge permit should be applied for and obtained before discharging it into the environment.	MAFWLR, DWA's Water Environment Division Contact: Ms. Elise Mbandeka Tel: +264 61 208 7167
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or	The Proponent should obtain the necessary authorisation from the MIME for the storage of fuel on-site (Consumer Installation Permit). Mr. Carlo McLeod (Ministry of Mines and Energy: Acting Director – Petroleum Affairs)

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
	less in any container kept at a place outside a local authority area."	Tel: +264 61 284 8291
Forestry Act (Act No. 12 of 2001)	The Act provides for the management and use of forests and forest products.	The Proponent will apply for the relevant permit under this Act if it becomes necessary to remove and transplant protected vegetation, such as the <i>Euphorbia giessii</i> and <i>Euphorbia lignosa</i>. Contact the MEFT's Forestry Directorate Office in the Erongo Region through the Head Office in Windhoek (in collaboration with the MEFT's Cape Cross Seal Reserve Division). Mr. Johnson Ndokosho: Director: Forestry Tel: +264 61 208 7666
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	Should any archaeological material, such as bones, unknown graves, old weapons/equipment, etc, be found on the site, work should stop immediately, and the National Heritage Council (NHC) of Namibia must be informed as soon as possible. The Heritage Council will then decide to clear the area or decide to conserve the site or material. Contact Details at the National Heritage Council (NHC) of Namibia Mrs. Erica Ndalikokule – NHC Director Tel: +264 61 301 903

4 EMP IMPLEMENTATION RESPONSIBILITIES

Telfs Investments (Pty) Ltd (the Proponent) and its mining partners (if any) are ultimately responsible for the implementation of the EMP. However, the Proponent may delegate this responsibility or part of it to someone else at any time, as they deem necessary. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are presented in Table 4-1.

Table 4-1: The EMP implementation responsibilities for the proposed salt production activities

Role	Responsibilities
Telfs Investments (Pty) Ltd (Proponent) with Mining Partners and or their Representative	-Managing the implementation of this EMP and updating and maintaining it when necessary. -Management and monitoring of individuals and/ or equipment on-site in terms of compliance with this EMP and issuing fines for contravening EMP provisions.
Mining/Operations Manager	This individual will be responsible for ensuring that the salt mining activities of the project are completed on time. The Manager's duties and responsibilities will include: -Ensure that relevant commitments contained in the EMP are adhered to. -Ensure relevant staff are trained in procedures entailed in their duties. -Maintain records of all relevant environmental documentation for the project. -Reviewing the EMP annually and amending the document when necessary. -Issuing fines to individuals who may be in breach of the EMP provision and, if necessary, removing such individuals from the site. -Cooperate with all relevant interested and affected parties/stakeholders. -Development and management of schedules for daily activities
Environmental Control Officer (ECO) / Safety, Health & Environment (SHE) Officer	The Proponent may assign the responsibility of ensuring EMP compliance throughout the project life cycle to a designated member of staff or an external qualified and experienced person, referred to in this EMP as the Environmental Control Officer (ECO) / SHE Officer. The ECO will have the following responsibilities: -Management and facilitation of communication between the Proponent, PRO, and Interested and Affected Parties (I&APs) regarding this EMP. -Conducting site inspections of all areas concerning the implementation of this EMP (monitor and audit the implementation of the EMP). -Advising the Proponent or Mining Manager on the removal of person(s) and/or equipment not complying with the provisions of this EMP. -Making recommendations to the PR for the issuing of fines for contraventions of the EMP. -Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
Public Relations Officer (PRO)	The PRO will be responsible for the following tasks: -Liaising between the stakeholders, the public, and the Proponent. -Ensure effective communication with stakeholders, media (if necessary), and the public. -Organising and overseeing public relations activities, managing public relations issues.

Role	Responsibilities
	-Preparing and submitting public relations reports, if required. -Collaborating with personnel and maintaining project-related open communication among personnel.

5 ENVIRONMENTAL MANAGEMENT MEASURES

5.1 Key identified Potential negative Impacts

The key potential negative impacts identified, described, and assessed in the Environmental Scoping Assessment Report, for which the management measures (action plans) have been provided, are listed below:

Positive impacts:

- Local socio-economic development through employment creation and income generation for the communities of Henties Bay, Uis, and other nearby settlements. Thus, it reduces unemployment rates in this part of the Erongo Region.
- Potential creation of opportunities for skills development and training related to salt production.
- Procurement of local supply chain (through goods and services) by local/regional businesses to generate income.
- An indirect positive impact on eco-industrial or educational tourism by incorporating the salt works site through guided tours and birdwatching at the salt ponds. This would complement the Cape Cross Seal Reserve.

Negative (adverse) impacts:

- Physical soil disturbance owing to the movements of project vehicles
- Terrestrial habitat loss from salt production activities (creation of evaporation pans and access roads), such as loss of feeding/roosting areas for shore birds and reducing habitats for Cape fur seals, if activities are carried out near colonies.
- Impact on local desert biodiversity (fauna and flora) through disturbance and barriers during salt production activities.
- Aquatic habitat declines or loss (Cape Cross Lagoons)

- Change in lagoon water volume and reduction in groundwater/lagoon water level (accelerated evaporation). The pans, embankments, and channels can alter groundwater-surface water interactions and sediment transport, leading to erosion.
- Potential increase in salinity and brine leakage, due to concentrated brine released accidentally or via seepage, can raise salinity in soils, groundwater, and adjacent lagoon/nearshore waters, posing a threat to vegetation and altering benthic communities.
- The potential impact of illegal hunting/poaching of wildlife in the area
- Visual impacts due to the presence of mining equipment near tourism sites (within tourist sight).
- Potential occupational health and safety risks
- Noise generated by project vehicles and machinery may disturb or interfere with faunal activities (breeding/pupping, resting, and feeding behaviour) near the site.
- Vehicular traffic safety and impact on local roads
- Environmental pollution (littering) through improper handling, storage, and disposal of waste
- Impact on archaeological & cultural heritage resources.

5.2 Cumulative Impacts Associated with the Proposed Project

The following cumulative impacts have been identified as associated with the proposed salt production (mining) activities. These have been described and assessed in the Scoping Report. The measures to manage and mitigate these impacts are similar to the measures recommended for the project's impacts under the section 5.1 above. Moreover, the mitigation of cumulative impacts would need a collective approach between all project proponents (project owners and developers) and key national/regional/local stakeholders (MEFT's DEAF & DWNP and CCSR, MIME, Erongo Regional Council, Henties Bay Municipality, etc), as well as interested and affected parties (I&APs), in the area and the Region at large for a much better outcome.

- Land and Soil Disturbance
- Poaching (illegal hunting of wildlife):
- Aquatic habitat declines or loss (Cape Cross Lagoons) during salt production at Cape Cross
- Impact on road infrastructure
- Water Resources
- Biodiversity and habitat
- Archaeological and Cultural Heritage
- Visual and landscape impacts, and cumulative regional development pressure.

5.3 Environmental Management Measures and Rehabilitation of Disturbed Sites

The management actions are aimed at avoiding the above-listed potential negative impacts as well as cumulative impacts, where possible. Where it is impossible to avoid these impacts, measures are provided to reduce the significance of these impacts. The Management action plans (mitigation measures) recommended for the potential impacts rated in the ESA Study were based on the following project stages (phases), as well as cumulative impacts:

- Planning and design measures in Table 5-1.
- Mining (salt production stage) measures in Table 5-2,
- Site rehabilitation and decommissioning measures in Table 5-3.

5.3.1 Planning and Design Phase Environmental Measures

The management and mitigation measures for the planning and design phase in preparation for the operational (salt production) phase are presented in Table 5-1.

Table 5-1: Environmental management and mitigation measures for the planning of the salt production (mining) activities

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Planning Phase					
EMP implementation and training	Lack of EMP awareness and implications thereof	-A Comprehensive Health and Safety Plan for the project activities should be compiled. -An EMP non-compliance penalty system should be implemented on-site. -The Proponent should appoint an Environmental Control Officer (ECO) or SHE Officer to be responsible for managing the EMP implementation and monitoring.	-All required EMP implementation Plans and Systems are compiled and in place. -ECO is appointed	-Proponent	Pre-mining
Authorizations	Lack of Agreements, Permits/ Licenses	-All the required agreements, licenses, or permits should be applied for and signed, respectively, before commencement of work on the MCs, or as required. -The permits and agreements referred to herein include: (a) Land use agreement through Memoranda of Agreement (MoA) with the MEFT's DWNP and the CCSR. (b) Waste management disposal permits from the relevant facility operator/owner (Henties Bay Municipality) (c) Water supply agreement with NamWater. (d) MIME fuel storage permit for petroleum stored onsite.	-Applicable permits and licenses to be obtained from relevant authorities. -The Memoranda of Agreements between the relevant Authorities are in place	-Proponent	Pre-mining
Infrastructure and biodiversity	Poor infrastructure design and installation/construction (access roads, pipelines, and ponds, biodiversity and	-All project infrastructure should be designed to ensure a minimum footprint size. Special attention should be paid to the large accessory works. In other words, apply minimal footprint design principles. -Schedule infrastructure establishment (construction) to avoid sensitive seasons (breeding/migration).	-All infrastructure is designed and installed accordingly -There is visible compliance with exclusion fencing placement	-Proponent	Pre-site infrastructure installation and mining

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
	habitats (breaking up continuous habitat)	-Placement of infrastructure should be done to avoid the interruption of episodic surface water flows. -Optimize routing to avoid sensitive areas and critical biodiversity zones. -Ensure the design and construction of wildlife crossings in areas with known natural movement paths that cross infrastructure.	-The timing of activities relative to sensitive periods is adhered to.		
	Poor drainage design changes natural water flows	-Design proper drainage that mimics natural flow regimes. -Install water control structures to maintain appropriate hydrological levels. -Avoid drainage paths through wetlands and sensitive aquatic habitats.	-The records of fixing problematic drainage/construction-induced flow alterations. -The wetland area is maintained above minimum thresholds.	-Proponent	Pre-site infrastructure installation and mining, and throughout the mining phase
Communication between the Proponent and land custodians/users, as well as stakeholders/I&APs	Lack of communication between land custodians/users, the Proponent, and the communities concerning the project	-The Proponent should appoint a Public Relations Officer (PRO) to maintain dialogue with stakeholders/I&APs as well as liaise between the Proponent and stakeholders throughout the mining period. -A clear communication procedure/plan, which should include a grievance mechanism, should be developed using the generic Grievance Redressal Mechanism (GRM) under Chapter 6 of this EMP.	-A PRO is appointed -PRO contact details provided to land custodians -The GRM is in place -There is a Complaint's logbook	-Proponent	PRO appointment (Before project activities) and their responsibilities throughout the project activities
Activity Planning	Lack of communication and transparency	-The Proponent should commit to holding engagement feedback meetings with stakeholders when needed and required, either before the project commences or during its implementation. -The proponent should meet with the MEFT: DWNP and CCSR to outline the work program and timing.	-Ongoing engagements throughout the project, when and as required.	-Proponent	Reporting meetings and or engagements to be held throughout the project cycle as deemed necessary
Site selection and activity footprint control	Disturbance to sensitive habitats (such as breeding sites of	-Restrict all project activities strictly to pre-approved and demarcated areas deemed environmentally acceptable.	-No recorded disturbances outside demarcated areas.	-Proponent	Pre-site establishment and

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
	Damara tern and other coastal fauna); habitat degradation	-The "NO-GO" zones should be clearly marked using visible signage and/or temporary fencing. -An environmental awareness training should be provided to all workers on the site boundaries.	-There are visible boundary markers on-site. -Training records for all personnel.	-Project/Mining Manager	throughout operations
Spatial buffer between beach and crystallisers (MCs)	Disturbance to coastal processes and fauna; increased risk to nesting birds (habitat fragmentation)	-A sufficiently wide buffer zone between the beach and the highly sensitive part of the crystalliser ponds (MCs) areas should be maintained. -No excavation or vehicle movement should be permitted within the buffer zone. - Regular inspection to ensure buffer integrity is maintained.	- Buffer zone maintained as per the approved layout plan. -No vehicle tracks or excavation observed within the buffer. -Inspection reports confirming compliance.	-Proponent -Mining Manager	Design phase, implementation, and continuous monitoring
Employment	Creation of employment opportunities	-Where possible, source the unskilled and semi-skilled labour for casual work (watchmen, guides, or labourers) from the project area. Out-of-area employment should be justified, for example, by the unavailability of local skills. -Contractors should give all unskilled and semi-skilled work to the locals before considering outsiders. This is to avoid the influx of outsiders into the area for work that can be done by the locals. -The anticipated work opportunities and number of positions should be announced through the local leadership offices (Arandis Constituency and Henties Bay Youth Group Leadership). -The names of the prospective workers should be screened by the local leaders to verify their place of origin to ensure that the opportunities reserved for the locals are not given to outsiders. -Where possible, the locals (such as graduates and youth) employed should be provided with the necessary training	-Number of locals employed on the project	-Proponent in collaboration with the Mining contractors	Pre-mining and, when necessary, throughout

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		and skills required to avoid bringing in many out-of-area workers.			
Land use	Lack of adherence to the land use agreement and consent conditions	-Commit to the conditions listed in the Memorandum of Agreements (MoA) signed with authorities such as the MEFT's DWNP and the CCSR.	-Proof of funds paid to the respective authorities' bank account and related records.	-Proponent	Pre-mining and, when necessary, throughout
Specialised procurement of services and goods	Empowerment of local businesses	-All services related to the project activities, such as trenching, site establishment, etc., that the Proponent may need, preference, and available, locally and regionally, priority should be given to local and regional businesses for such services and goods.	-Number of hired contractors. -Record of hired or contracted companies or service providers	-Proponent	Pre-mining
Presence of the project workforce in the area	Combating/fighting anti-poaching	-Commit to assisting the DWNP in fighting against poaching (crime against wildlife) while in the area by creating awareness among the project workers and the impact of such crimes on the host environment and the country at large. -Report any suspicious activities related to wildlife crime to the MEFT: DWNP and the nearest Police.	-Proof of assistance rendered to the DWNP in combating poaching in the area throughout the project duration	-Proponent	Pre-mining and throughout the subsequent project phases

5.3.2 Operational (Salt Production) Phase Environmental Measures

The management and mitigation measures for the operational (salt production) phase are presented in Table 5-2.

Table 5-2: Environmental management and mitigation measures for the Salt Production activities

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Construction and Salt Production (Mining) Phases					
EMP implementation and training	Lack of EMP awareness and implications thereof	-EMP trainings should be provided to all workers on-site. -All site personnel should be aware of the necessary health, safety, and environmental considerations applicable to their respective work. -The implementation of this EMP should be monitored. The site should be inspected, and a compliance audit should be done throughout <u>the project activities, monthly, and biannually for overall EMP implementation.</u> -EMP non-compliance penalty system should be implemented.	-Records of EMP compliance/monitoring conducted biannually -The ECC is renewed every 3 years -Records of EMP training conducted.	-Mining Manager -ECO	Throughout the mining phase
Communication between the Proponent and land custodians/users	Lack of communication (proper liaison) between land custodians and the Proponent on land use	-The PRO should be introduced to the stakeholders, and their contact details should be provided to them before undertaking activities for easy communication. -The Proponent should compile a clear communication procedure/plan, which should include a grievance and response mechanism.	-PRO is part of the project personnel, and there is a project complaint logbook -Records of continued stakeholders' engagements -Public grievances addressed to their satisfaction	-Mining Manager	Throughout the mining phase
Cumulative Impact Management and Inter-Project Coordination	Lack of proper engagement and timely information sharing: Communication and engagement between the Proponent and stakeholders, and	-Collaborate with any other active mining operators/projects in the area on schedules, share mitigation measures where feasible, and combine monitoring efforts. This would be an innovative and proactive step, setting a positive precedent for responsible mining in this part of the Cape Cross.	-Mining is designed with consideration for wildlife in the area. -There are visible and proven joint efforts of collaboration, shared mitigation measures, and environmental monitoring efforts that are combined.	-Proponent -Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
	I&APs (neighbouring properties/operators)				
Physical disturbance to the site soils	Physical soil/land disturbance and loss of topsoil	-Stockpiled topsoil and trenched materials should be used to backfill the excavated and disturbed site areas/spots. -The topsoil (materials) that was stripped from certain site areas to enable project works and can be returned to its initial position should be returned. This is to avoid unnecessary stockpiling of soil material, which would leave them prone to erosion. -Soils that are not within the intended footprints of the site target areas should be left undisturbed, and soil conservation implemented as far as possible. -Project vehicles/machinery should stick to access roads provided and not unnecessarily create further tracks on and around the site by driving everywhere, resulting in soil compaction and erosion. -Off-road driving in the area is strictly prohibited. Stick to approved and existing site access roads. -Strict topsoil management and progressive rehabilitation should be implemented. -Where possible, long-term trenches and pits should be barricaded during use and backfilled soon after. This is to prevent wildlife from falling or getting trapped in open trenches.	-No proliferation of informal vehicle tracks created by project activities. -No complaints from the MEFT: DWNP or other stakeholders about the unnecessary creation of tracks in the area (visual nuisance).	-Mining Manager -ECO	Throughout the mining phase
Water resources use	Over-abstraction (water demand and availability)	-Agreements for water supply should be made between the water supplier (NamWater) and the Proponent. -Water should be used efficiently, and recycling and reusing of water for certain site activities should be encouraged. -Water reuse/recycling methods should be implemented as far as practicable, such that the water used to cool off mining	-Water supply agreements -Proof/ recording/ quantification of water saving efforts. -Water supplying agreements	-Proponent -Mining Manager -ECO	Once-off supply agreements/licenses that are renewed as required

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		equipment should be captured and used for the cleaning of project equipment, where possible. -Water storage tanks should be inspected daily to ensure that there is no leakage, resulting in wasted water on site. -Water conservation awareness and saving measures training should be provided to all the project workers to understand the importance of conserving water and become accountable.	-Water storage tanks on site		The remaining measures should be implemented throughout the mining phase.
Habitat protection (coastal and salt pan ecosystems)	Loss or degradation of ecological features such as salt pan crusts and associated organisms (such as microbial communities)	-Unnecessary disturbance of salt pan surfaces outside designated excavation zones should be avoided at all costs. -The movement of heavy machinery should be limited to predefined access routes. -Implement site progressive rehabilitation, where feasible.	-There is minimal visible disturbance outside designated areas. -The defined access routes are adhered to. -There is evidence of rehabilitation activities, where applicable.	-Mining Manager -ECO	Throughout the site establishment and operational/mining phase
Biodiversity conservation	The displacement or disturbance of coastal bird species and other fauna	-Salt excavation activities should be scheduled outside critical breeding periods where possible (avoiding the critical breeding season between November and March). -The presence of sensitive species should be monitored, and work should be halted if necessary. -Implement and enforce speed limits to reduce fauna collisions.	-There are no incidents of harm to wildlife reported. -Monitoring records are maintained. -Compliance with speed limits.	-Mining Manager -ECO	Throughout operations (with emphasis on breeding season, i.e., November to March)
Impact on the sensitive Biodiversity: Wild Fauna and Flora	Wildlife (fauna)	-To ensure continued conservation and protection of biodiversity (fauna) in the host environment, the crystallisers should be constructed in such a way that allows the movement of mammals. -The natural brine ponds that are close to the sea should not be affected. Therefore, the Proponent should leave a buffer area between the crystallisers and the natural brine ponds.	No disturbance to unmarked areas. -No complaints of wildlife hunted by the project workers. -No intentional disturbance and destruction of site	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Refrain from disturbing or killing small soil and animal species found on and around the site. -Breeding sites occurring on and around the MC site should not be destroyed or disturbed. -Open trenches and or holes should be secured (temporary fencing), barricaded, backfilled, and capped after sampling is completed to prevent injuries to wildlife. -Implement exclusion fencing around work zones. -Incorporate Environmental awareness and biodiversity preservation into the employment contracts of all workers.	- vegetation and faunal species -Project workers are trained on the conservation and protection of fauna		
	Vegetation (Flora)	-Avoid unnecessary removal of the already scarce vegetation to promote a balance between biodiversity and the project. -Vegetation found on the site, but not in the targeted site areas or access route, should be left undisturbed/avoided. -Vehicle movement should be restricted to existing roads and tracks to prevent unnecessary damage to the surrounding vegetation. -No onsite vegetation should be cut or used for firewood. -Access roads should be created in a manner that disturbs minimal vegetation. -The removal of vegetation for tracks or camps should be minimized. -No off-road driving outside demarcated site areas. This is to avoid unnecessary damage to vegetation crusts. -The introduction of invasive plant species (through vehicle tires or imported materials) is not allowed. -Commit to rehabilitating any compacted areas to enable regrowth, as far as practicable.	-No disturbance to unmarked areas. -No complaints from locals regarding unauthorised vegetation removal of site vegetation. -No intentional disturbance and destruction of site vegetation -Barricading tape (to indicate working areas) -Visible preservation of onsite vegetation -Project workers are trained on the conservation and protection of fauna	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Environmental awareness on faunal and floral biodiversity preservation should be provided to the workers and contractors by incorporating it into the workers' contracts.			
Illegal hunting	Illegal hunting of wildlife	-The Poaching (illegal hunting) or disturbance/harming of wildlife on the MCs and surrounding areas is strictly prohibited. -A No Tolerance to Poaching Policy should be developed and applied to all project workers and project visitors. -Incorporate a No-tolerance rule for poaching in every employment contract and ensure that the workers understand the seriousness of this. In other words, there is no tolerance for poaching or wildlife crime. -A code of conduct should be incorporated into the employees' contracts to discourage any form of wildlife poaching intentions.	-Proven incident reports of illegal hunting of wildlife by the crew were reported to the Police. -Contact details of the Anti-poaching Police Unit are provided and visible on-site	-Mining Manager -ECO	During site setup and throughout the mining phase
Terrestrial habitats	Loss of terrestrial habitat from salt production activities	-All designs should be evaluated on a very fine scale, and an attempt should be made to adapt the designs in such a way that the footprint is decreased to its absolute minimum. In this regard, special attention should be given to the large accessory works area. -Specific attention should be given to avoiding the interruption of surface water flows by small-scale changes in infrastructure placement and their boundaries. -The operation footprint should be restricted to defined zones and avoid sensitive areas. -Implement progressive rehabilitation of disturbed site areas. -Establish habitat corridors and buffer zones to ensure continued biodiversity and habitat conservation and protection. -Control access and prevent off-road driving outside the boundaries of the mining claims (site).	-The area of disturbed habitat vs restored is assessed biannually. -The number of protected species recorded and conserved. -There is visible compliance with conservation buffer zone limits. -Annual audit and reporting (in the bi-annual report)	-Proponent -Mining Manager -ECO	Progressive rehabilitation is to be ongoing throughout the mining phase.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Aquatic habitat and Cape Cross Lagoons	Aquatic habitat declines or loss (Cape Cross Lagoons)	-Establish water flow management to maintain natural hydrology. -Avoid the construction of any project infrastructure or structure near sensitive lagoon margins. -Implement sediment and erosion control plans. -Create conservation areas for critical aquatic habitat.	-Lagoon water quality parameters such as turbidity and nutrients. -Species richness and abundance in the lagoon before and during the mining phase (salt production stage). -Number of habitat rehabilitation interventions implemented.	-Proponent -Mining Manager -ECO	The installations should be done before mining starts. Other measures to be implemented throughout the mining phase, as and when necessary Monitoring to be done throughout the mining phase
Lagoon water volume and reduction in groundwater/lagoon water levels	Change in lagoon water volume and reduction in groundwater/lagoon water level (accelerated evaporation)	-Design ponds and infrastructure to minimize excessive water draw and exposure. -Use water level control structures to manage lagoon levels. -Where necessary, evaporation ponds should be lined to reduce seepage. -Implement the real-time monitoring of lagoon and groundwater levels onsite, where possible.	-Water level trends (lagoon & groundwater) relative to baseline. -Frequency of exceedance above the acceptable threshold. -Effectiveness of control structures.	-Proponent -Mining Manager -ECO	The pond designs and liner installations should be done before mining starts. Monitoring to be done throughout the mining phase
Salinity and brine leakage	Potential increase in salinity and brine leakage	-Install impermeable linings on evaporation ponds and salt storage areas. -Maintain and inspect brine containment structures regularly. -Implement drainage controls and leak detection systems. -Rapid response plan for brine spills or leaks As an alternative to a bitterns re-use plan, develop a bittern's disposal plan. This could include¹:	-Salinity measurements (surface, groundwater, and soil) against baseline. -The recorded number of containment failures or leaks. -Quick response time and effectiveness in	-Proponent -Mining Manager -ECO	Installations should be done before mining starts. Other measures and monitoring to be implemented throughout the mining phase, as and when necessary

¹Pulfrich. A. (2015). Marine Ecology Specialist Statement to Environmental Impact Assessment and Environmental Management Plan for the Cape Cross Salt Works, Plant and Linear Infrastructure.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Dilute the bitterns with fresh brine/seawater before releasing onto the beach to reduce ion concentrations and salinity. -Monitoring of bitterns density and ionic concentrations before releasing them onto the beach. -Monitoring of discharge volumes and discharge rates on the release of bitterns -Positioning of the discharge point as far down the beach as possible (e.g., through a flexible end section of the pipeline); -Discharge of bitterns at a half tide or higher during the ebbing tide only to maximise the effects of dilution; -Reporting of any mortalities of marine life in the vicinity of the bitterns' outlet as a direct consequence of the discharge. -Undertaking a hydrodynamic modelling study of the bitterns' discharge (should consequences be reported necessitating verification) to establish the extent of the sacrificial zone and confirm the predictions of this ecological assessment.	- responding to leak incidents. -Percentage of brine storage with intact liners.		
Visual impact: Scenic view of the area for Tourism	The presence of mining equipment near tourism sites (within tourist sights, or lingering evidence of trenches. Impact on the scenic view of the area for tourists and travellers on the roads.	-The campsite should be established in a way that blends in with the surrounding environment to limit its obvious presence to road users (tourists and travellers alike). -Avoid unnecessary high projections of materials onsite.	-No complaints of visual nuisance from the travellers or stakeholders -No disturbed site areas are left without rehabilitation	-Mining Manager	Throughout the mining phase
Waste Management	Environmental Pollution (littering)	-Responsibly dispose of waste and do not litter. -No toxic and hazardous substances should be left on site. Drill cuttings and wastewater should be contained in sumps away from any drainage lines and properly disposed of.	-No visible litter around the project area -Provision of sufficient waste storage containers	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-After each day's work, ensure that there is no waste left on the working sites or scattered around the camp. -All domestic and general operational waste produced daily should be contained on-site until it is transported to designated waste sites. -No waste may be buried or burned on site or anywhere else. -The mining sites and campsite should be equipped with separate waste bins for hazardous and general/domestic waste. -A penalty system for the irresponsible disposal of waste on-site and anywhere in the area should be implemented. -Ensure careful storage and handling of hydrocarbons on site. -An emergency plan should be available for major/minor spills at the site during operational activities.	-Waste management awareness -Waste disposal permits to municipalities -Environmental, Health, and Safety Statements and Policy		
	Wastewater is generated by project workers living on-site.	-There should be a Zero tolerance for pollution. Therefore, project waste or effluent must NOT be released into the environment (water and soil/ground surface) without treatment, and any contaminated soil or materials must be removed promptly. -Potential contaminants such as hydrocarbons and wastewater should be contained on site and disposed of per municipal wastewater discharge standards so that they do not contaminate surrounding soils and eventually groundwater. -No open defecation is allowed on and around the site. -Sewage waste should be stored as per the portable chemical toilets supplied on site and regularly disposed of at the nearest treatment facility -Provide sufficient toilet facilities for workers (mobile/portable chemical toilet if possible).	-Adequate toilet and basic ablution facilities on site -Chemical toilets (as deemed suitable) - Sewage removal operator -Waste treatment agents/chemicals to treat wastewater/effluent -The effluent discharge permit is applied for and issued for the project	-Proponent -Mining Manager -ECO	The suitable sewage management option should be installed or implemented before the campsite is set up. The remaining measures should be implemented throughout the mining phase.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Emptying of chemical toilets according to the manufacturer's specifications.			
	Hazardous waste (fuels, oils, lubricants, etc.).	-Develop and prepare countermeasures to contain, clean up, and mitigate the effects of an oil spill. This includes keeping spill response procedures and a well-stocked cache of supplies easily accessible. -Ensure employees receive basic Spill Prevention, Control, and Countermeasure (SPCC) Plan training. -Project machines and equipment should be equipped with drip trays to contain possible oil spills when operated on site. -Polluted soil should be removed immediately and put in a designated waste-type container for later disposal. -Drip trays must be readily available on this trailer and monitored to ensure that accidental fuel spills along the tank around the site are cleaned on time (soon after the spill has happened). -Polluted soil must be collected and transported away from the site to an approved and appropriately classified hazardous waste treatment facility. Washing of equipment contaminated with hydrocarbons, as well as the washing and servicing of vehicles, should take place in a dedicated area, where contaminants are prevented from contaminating soil. -Toilet water should be treated using chemical portable toilets and periodically emptied before reaching capacity and transported to a wastewater treatment facility. -The working sites should be equipped with a hydrocarbon spill kit. -Oil spills should be taken care of by removing and treating the soil affected by the spill.	-No complaints of pollutants on the soils and eventually in the general environment due to project activities -No visible oil spills on the ground or pollution spots. -Availability of waste containers -Non-permeable material to cover the ground surface in areas where hydrocarbons and potential pollutants are utilized.	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-The servicing of vehicles near watercourses and unlined ground surface is prohibited -The accidental contamination of any major nature should be reported to the authorities (MAFWLR for effluent/wastewater and MIME for hydrocarbons).			
Occupational Health and Safety Risks	General health and safety associated with project activities	-During inductions, provide project workers with an awareness training of the risks of mishandling equipment and materials on site and the health & safety risks associated with their respective jobs. -Project workers should be properly equipped with adequate and appropriate personal protective equipment (PPE) such as coveralls, gloves, safety boots, earplugs, dust masks, safety glasses, etc. -Heavy vehicle, equipment, and fuel storage sites should be properly secured, and appropriate warning signage should be placed where visible. -Trenches should be temporarily fenced off during sampling, and once completed, they should be backfilled thereafter -Drill cuttings and excavated materials should be put back into the hole, and the holes filled and levelled, and trenches backfilled, respectively. -An emergency preparedness plan should be compiled, and all personnel appropriately trained. -Workers should not be allowed to enter the working sites when under the influence of alcohol, as this may lead to mishandling of equipment, which results in injuries and other health and safety risks. -Ensure that goods and projected loads are securely fastened to vehicles to avoid falling and injuring people. -Warning signage should be erected at hazardous site areas such as open trenches.	-Comprehensive health and safety plan for all project activities compiled. -Quarterly refresher training on health & safety -Occupational Health and Safety Personnel Health and Safety Training -Availability of fully-furnished first aid kits -Trained worker to administer first aid	-Proponent -Mining Manager -ECO	Throughout the mining phase and training offered as and when required

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-The site areas that are considered temporary risks should be equipped with "danger" or "cautionary" signs written in languages such as Afrikaans and English. -Project vehicles should observe low speed limits to avoid accidents.			
	Potential increase in the prevalence of HIV and AIDS, as well as other sexually transmitted diseases (STDs) prevalence	-Engage workers in sexual health talks and training about the dangers of engaging in unprotected sexual relations, which result in contracting HIV/AIDS and other sexually transmitted infections. -Provision of condoms and sex education through the distribution of pamphlets and health training. These pamphlets can be obtained from the nearest local health facility in Henties Bay.	-No new infections recorded linked to project workers -Occupational health and safety personnel -Sex and Health Education/Awareness -Provision of condoms at the campsite	-Mining Manager -ECO	Throughout the mining phase
Fire management	Accidental fire outbreak	-Portable and serviced fire extinguishers should be provided at the working sites and camp. -No open fires to be created by project personnel on-site. -Consider using gas or paraffin cookers to prepare food instead of open fires. The cook/stove's fire should be put out before leaving the camp. -Make provision for smoking areas for crew members who smoke. This is to ensure that the cigarettes' fire is completely put out and disposed of in the allocated bins at the smoking area. -Potential flammable areas and structures, such as fuel storage tanks, should be marked as such with visible signage. -Raise awareness among workers on the impact of careless handling of fires and flammable substances in the fire.	-No wildfires recorded (due to the presence of workers) -Fire extinguishers (1 per vehicle) and 1 per working site	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Vehicular Traffic Safety	Traffic management	<u>Further traffic management measures provided by Du Toit (2016) are as follows:</u> -Warnings of salt roads having no road markings must be provided at the start of each such section, exit from towns, and at significant junctions and intersections. -The warning of slippery when wet should be combined with the previous warning of salt road, no road markings, either as a separate warning sign with 120 m separation or a part of a high visibility combination sign. -The vertical alignments of all the salt roads should be evaluated for passing sight distance, and where warranted, the NO PASSING sign must be provided with supplementary information and/or in conjunction with warning signs. -The design of a BLIND CREST/RISE warning sign for use on unsealed roads should be proposed to the SADC road traffic signs coordinating body. -The salted cross-section of the D2310 must be maintained to the standard width of $2 \times 4.9 \text{ m} = 9.8 \text{ m}$. This can be done incrementally as the salt mining traffic increases. -The recovery area/ clear zones next to the road should be maintained at 9 m from the centre line. -Edge markers in the form of white poles with yellow reflective strips must be maintained at standard spacing and at features. -The substandard curve can be flattened to the $R = 465 \text{ m}$ that is required. In the interim, an appropriate speed limit or advisory speed can be erected; for the current curve, a speed limit of 80km/h should suffice, given that the super elevation cross fall is not less than 4%. -The maintenance operations of the salt road must be taken into account in the planning of the transport operations of the salt mine.	-No complaints from members of the public regarding vehicular traffic issues related to the project activities. -All personnel operating the project vehicles and machinery are appropriately licensed and in possession of valid driving licenses. -Demarcated areas for parking, offloading, and loading zones are on sites. -No creation of unnecessary tracks on site.	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Transport operations must be considered for a range of variables to determine if there are combinations that negatively impact traffic safety. -Truck operations must be monitored by means of GPS or similar tracking devices to ensure observation of speed limits, overtaking behaviour, and platooning.			
	Traffic safety and an increase in vehicular traffic flow	-Project-related goods and services should be delivered to the site once or twice a week to reduce the daily movement of trucks and put too much pressure on local roads. -Drivers of all project phases' vehicles should have valid and appropriate driving licenses and adhere to the road safety rules. -Drivers should drive slowly (40km/hour or less) and be on the lookout for wildlife. -Ensure that the site access roads are well equipped with temporary road signs. -Project vehicles should be in a roadworthy condition and serviced regularly to avoid accidents owing to mechanical faults. -Vehicle drivers should only make use of the designated site access roads provided and as agreed. -Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol. -Project vehicles should be parked within the boundary or demarcated areas for such purpose. -Deliveries from and to the site should be done optimally during weekdays and between the hours of 8 am and 5 pm. -The site access road(s) should be maintained to an acceptable standard for the vehicles.	-No complaints from members of the public regarding vehicular traffic issues related to the project activities. -All personnel operating the project vehicles and machinery are appropriately licensed and in possession of valid driving licenses. -Demarcated areas for parking, offloading, and loading zones are on sites. -No creation of unnecessary tracks on site.	-Mining Manager -ECO	Throughout the mining phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
	Road overuse and lack of proper maintenance	-Heavy trucks transporting materials and services to the site should be scheduled to travel a maximum of twice a week to avoid daily travelling to the site, unless in cases of emergencies. -Consider frequent maintenance of local roads in the area to ensure that the roads are in good condition for other road users, such as tourists from outside the area.	-Visible efforts of maintaining access and communal roads by the Proponent	-Proponent -Mining Manager	Throughout the mining phase, when necessary
Noise	Nuisance to wildlife and tourists in the area	-Noise from operations' vehicles and equipment on the sites should be kept to a minimum at all times. -Mining hours should be restricted to between 07h30 and 17h00 to avoid noise generated by equipment and the movement of vehicles before or after hours. -Unnecessary noise should be avoided at all costs. -When operating noisy machinery and equipment, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce exposure to excessive noise.	-Noise levels are kept at a minimum and only when necessary. -Noise protective equipment for workers	-Mining Manager -ECO	Throughout the mining phase
Archaeology and heritage	Accidental disturbance of archaeological heritage objects	-According to Kinahan (2015), measures should be taken to preserve the suspected grave sites, and if impacts on these sites cannot be avoided, they will have to be subject to test excavation under a permit issued by the NHC. Where possible, these sites, as well as whatever remains of the guano railway that do not lie within areas to be mined, should be treated as "no-go" areas. The mitigation measures provided herein should be implemented alongside the Archaeological Management Plan (AMP) appended to the AHIA Reports for the MCs by Mushi (2026). -If any archaeological materials, human burials, or skeletal remains are uncovered during mining activities, then the work in the immediate area should be halted, the finds would	-Preservation of all artefacts and objects that are discovered on and around the project site -Salvage equipment -Archaeologist to recommend further actions -Flag tapes -GPS (site marking)	-Mining Manager -ECO -Operator (Excavating personnel)	As and when required, i.e., before site set up, and during the mining stage.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		need to be reported to the Heritage Authority, and may require inspection by an Archaeologist. The ECO should have the area fenced off and contact NHC (Tel: +264 61 244 375), National Forensic Laboratory (+264 61 240 461) immediately. -Under no circumstances shall any artefacts be removed, destroyed, or interfered with by anyone on the site; and Contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological, or palaeontological artefacts, as set out in the National Heritage Act (Act No. 27 of 2004), Section 52 (2). -Staff Training: Ensure that all workers involved in the project are trained to recognize potential archaeological materials, whether on the surface or subsurface. This can help avoid delays and ensure the process is efficient. -Any pile of stones or mound of earth looking even remotely like a grave should be avoided at all costs. -A "No-Go-Area" should be established where there is evidence of sub-surface archaeological materials, sites, gravesites, historical, or past human dwellings. It can be a demarcation by fencing off or avoiding the site completely by not working closely or near the known site. -Cognizance must be taken of the larger cultural & heritage landscape of the area to avoid the destruction of previously undetected heritage sites. Should any previously undetected heritage or archaeological resources be exposed or uncovered during the development phases of the proposed project, these should immediately be reported to the heritage specialist or heritage authority (NHC of Namibia). -The Proponent and Contractors should adhere to the provisions of Section 55 of the National Heritage Act in the event significant heritage and cultural features are discovered in the course of developmental works.			

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-It should be noted that the subterranean presence of archaeological and/or historical sites, features, or artefacts is always a distinct possibility. Care should be taken when the project commences that if any of these are discovered, work on the site ceases immediately, and a qualified archaeologist is called in to investigate the occurrence. -Documentation and Reporting: All findings should be documented thoroughly. Even minor artifacts or features should be recorded, as they can help build a broader understanding of the region's history or may be relevant to future heritage projects or conservation efforts. -Bi-annual auditing is highly recommended.			

5.3.3 Site Rehabilitation Measures

The management and mitigation measures for the planning and design phase in preparation for the operational (salt production) phase are presented in Table 5-3.

Table 5-3: The Mitigation measures for site rehabilitation

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Progressive Rehabilitation and Decommissioning Phase					
Rehabilitation	Disturbance and damage to the site land	-All holes and excavated pits related to the project activities should be capped and backfilled, respectively. -All waste generated and stored on site during mining activities should be disposed of at the nearest solid waste management sites. -The stockpiled materials onsite should be levelled soon after completion of works at each site.	-Capped holes and backfilled pits/trenches -No sign of waste or littering seen on site and around site areas. -Carrying away of waste, and removal of vehicles and equipment from the site -No stockpiled material left as is (the material is levelled	-Proponent -Mining Manager	Progressive rehabilitation is done throughout the mining phase, and complete decommission and rehabilitation are done after completion of mining works.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Any temporary setup on site should be dismantled, and the area rehabilitated as far as practicable, to its original state. -Disturbed areas on worksites should be progressively rehabilitated by stockpiling and backfilling. -All equipment, litter, and signage should be removed. -If any access roads/tracks were created, they should be scarified or otherwise returned to a natural state unless the MEFT requests to keep them for their use. -Provision of both financial and technical resources for progressive rehabilitation. -The MEFT (DWNP and CCSR) should be consulted to approve and sign off on Site Rehabilitation Completion	- after completion of each work) -Campsite dismantled, - Campsite dismantled, site levelled, and materials taken away from the site -Visible signs of stockpiled topsoil -Record of trenches excavated, and holes drilled -Waste containers on sites -Photo records of backfilled sites -Records of finances set aside for decommissioning activities		From zero (0) to 3 months post-mining for site backfilling and waste removal Three (3) to six (6) months post-mining for onsite vegetation recovery and site stabilization.
<i>Progressive rehabilitation is done throughout the mining phase, and complete decommissioning and rehabilitation after completion of mining works.</i>					

6 GRIEVANCE REDRESSAL MECHANISM (GRM) (ADOPTED FROM SOLNAM ENERGY SUPPLEMENTARY ESIA BY PALLETT AND SHAGAMA, 2024)²

A process will be established for stakeholders and members of the public to communicate any concerns or complaints about the project during its implementation. This grievance mechanism will be implemented throughout the project cycle, providing a channel of communication from the public to the Mining Manager, so that issues can be resolved in a timely and amicable manner.

6.1 Objectives of the Grievance Mechanism

The objectives of the grievance mechanism will be to:

- Clarify the nature of the grievance,
- Provide stakeholders/I&APs with a platform to submit their grievances and or comments on the project activities,
- Record the grievances received as well as comments in a grievance log (complaints logbook),
- Review, investigate, and promptly resolve the grievances from a stakeholder and or the public,
- Respond (solution to the grievances) to the stakeholder and ensure that they are satisfied with the mitigating action or solution (response) provided, and
- Communicate the responses to the stakeholders and provide positive feedback or action to their grievances.

6.2 Proposed Grievance Procedures

6.2.1 Categorization of Stakeholder (Interested & Affected Party (I&AP))

Grievances may arise from stakeholder groups or individual I&APs that were registered during the EIA process, and other unforeseen groups. However, the known and anticipated stakeholder groups that would potentially form part of the grievance mechanism include:

- **Neighbouring properties**, such as neighbouring salt mining operators, Cape Cross Lodge, and other properties near the project site.
- **Employees and mining contractors**: personnel or workers who will be involved in the salt mining project

² F. Shagama and J. Pallett. (2024). Stakeholder Engagement Plan (SEP) for the Proposed Construction and Operation of a 55MW Solar PV Plant and Associated Infrastructures on a Portion of Portion 2 of Farm Klein Spitskop No. 153 near Keetmanshoop in the //Kharas Region, Namibia. Windhoek. Unpublished.

- **Local businesses:** these are companies that are affected by the project, directly or indirectly
- **Government and regulatory bodies** such as local authority, regional (Erongo Regional Council), or national agencies (MEFT (DEAF, DWNP, and CCSR), Ministry of Industries, Mines and Energy (MIME), and others) with oversight.
- **Environmental Groups:** these are civil society groups or non-governmental organizations (NGOs) that focus on environmental protection and sustainability.

6.2.2 Categorization of Grievances

Grievances come in different forms or types; thus, they are categorized below to streamline processes and ensure effective handling of concerns and issues raised by stakeholders. The type of grievances anticipated from the project, their brief description, and whether they are internal or external, are provided in Table 3 below.

Table 6-1: Types (categories) of grievances

Type of grievance (issue)	Brief description	Internal or external
Environmental (biological and physical)	This will entail issues raised on local ecosystems, wildlife, as well as soil and water pollution (deteriorating quality) and air (dust generation), etc.	External
Social	Entails disregarding local cultural values and norms, trespassing on private properties by project workers, and loss of national revenue due to project activities that may significantly affect conservation and tourism-related activities.	External
Economic	Issues related to job creation (unfair recruitment practices such as outsiders taking jobs that can be done by locals of the site area/region), unfair labour practices and compensations, unfulfilled commitments for corporate social responsibilities, and local investment through procurement of available services and goods for the project (opportunities given to out-of-area /town /region companies at the expense of local businesses)	External
Operational Grievances	-Socio-economic and land use, cultural heritage -Land use disputes (operations outside the demarcated site boundaries/mining claims' boundaries) -Salt mining-related complaints	External
Occupational health and safety	Concerns about worker safety and health hazards. An example is workers working without proper or appropriate PPE (protective gear) for their tasks. Lack of first aid or trained first aid administering personnel on-site, incidents involving workers on or near the project site, etc. -Discrimination and harassment among workers	Internal
Public health and safety	-Exposure to risk such as chemicals, noise, or dust -Complaints about health issues perceived to be linked to the project.	External

Type of grievance (issue)	Brief description	Internal or external
	Safety Issues such as road accidents related to project trucks, especially speeding project vehicles, as well as incidents involving members of the public.	

It is against this background that the grievances associated with the project will be handled by the Proponent through the Site/Operations Manager and the Mining Contractor. These will include the following steps and timelines:

- For internal grievances, a grievance registration book (register) will be kept onsite for workers and visitors, where site issues will be recorded for immediate addressing. The Mining/Operations Manager will have access to the register copy.
- A grievance registration book will be available on-site, for stakeholders within proximity of the site and who are comfortable submitting issues in person (clearly handwritten letters).
- Alternatively, stakeholders can submit their grievances:
 1. Intentional scheduled stakeholders' meetings at the MEFT: DWNP and CCSR Offices or the Erongo Regional Council for face-to-face submissions.
 2. Via email or phone messages to these officials,
 3. Physical mail or drop-box for formal written grievances at the mining camp through the PRO,
 4. Stakeholders/I&APs who are based in or near Henties Bay can submit their written grievances to the Henties Bay Municipality office, and those in or near Swakopmund can submit comments to the Erongo Regional Council, attention to the Chief Regional Officer, and copying the Arandis Constituency Councillor.
- Stakeholders may also submit anonymous grievances (to the PRO) if they are not comfortable providing their identity.
- The Erongo Regional Council management will then forward the concerns to the Telfs Investments Operations/Mining Manager for consideration.
- Open discussion of the issue or problem by the Operations/Mining Manager to find solutions to the issue(s)/grievance(s). Provision should be made for collaboration between Telfs Investments and the stakeholder/I&APs raising the grievance to resolve the issue. **Responses or resolutions should be provided within 7 days**, unless there is a reasonable explanation for a delayed response. Any delay should be communicated to the stakeholder/I&AP (complainant).
- Telfs Investments will need to keep a detailed record of discussions, concerns, solutions provided, and any new solutions to ensure clarity and accountability.
- If the stakeholder is not satisfied with the proposed resolution:

1. Telfs Investments can offer revised solutions (responses) that address stakeholder concerns.
 2. Telfs Investments or the complainant can engage the local leadership (MEFT: DWNP) and, if necessary, the Erongo Regional Council for further assistance and mediation in resolving the issues.
 3. Escalation to higher governance bodies, such as the MEFT, should be sought before going the legal route to resolve the issue.
- It is important to keep all stakeholders/I&APs informed about the situation (grievance) and any actions being taken. Clear communication can help manage expectations and reduce tension between Telfs Investments and the stakeholder/I&AP (complainant).

6.2.3 Grievances Submission and Recording

The Grievance Mechanism stipulates the need for the following:

- Training – those who are responsible for addressing grievances must have detailed knowledge of how the project's grievance mechanism works and whom to speak with on each category of issues.
- Record Keeping – all aspects of the grievance management process must be comprehensively documented, and accurate records should be maintained. The information to be contained in these records will include:
 1. Full name of the stakeholder (complainant)
 2. Contact details (phone number and, if applicable, email address)
 3. Grievance details
 4. Date of grievance submission and signature of the complainant
 5. Name of the person who received the grievance and signature
 6. Provision for feedback or response should be made on the grievance record
 7. Date when feedback is expected, at least within 7 days from grievance submission.
When delays are expected, an explanation should be provided before the 7-day period elapses.
- Grievance resolution process: In terms of ensuring that the process is effective, Telfs Investments will need to include the following steps
 - a) Acknowledgment: confirming receipt of the grievance
 - b) Investigation: steps taken to investigate the issue raised
 - c) Resolution proposal: provide solutions or mitigating actions based on findings
 - d) Implementation: Steps taken to implement the agreed-upon solution
 - e) Follow-Up: checking in with the complainant to ensure that they are satisfied with the resolution or solution proposed or implemented.
- Reporting – Telfs Investments will compile information relating to engagement activities as appropriate for the monthly social and environmental reports.

6.2.4 Monitoring of the Grievance Mechanism

The effectiveness of the grievance mechanism should be monitored on a bi-monthly basis to see what is working and what is not. If not working as intended, the mechanism will need to be amended accordingly. The effectiveness of the grievance mechanism will be monitored for the following aspects, or by answering the following questions:

1. How easily can stakeholders access the grievance mechanism?
2. What communication channels are available to submit grievances, and which ones are more effective or preferred by stakeholders? Online via email, in-person onsite, phone calls (but preferably in writing for record keeping).
3. Are stakeholders aware of the existence of the grievance mechanism?
4. Evaluate if the information about the mechanism is communicated clearly and effectively.
5. Track the time taken to acknowledge and respond to grievances and how quickly grievances are resolved.
6. How thorough are investigations into submitted grievances, and if grievances are adequately addressed?
7. Evaluate whether stakeholders are involved in the resolution process when appropriate.
8. Evaluate stakeholder satisfaction by gathering feedback from stakeholders about the grievance resolution process. This can be enhanced by conducting surveys or interviews after resolution to assess satisfaction levels.
9. Clearly document grievances and resolutions to ensure there is transparency in documenting the grievance process, including decisions made and outcomes.
10. Check if there are regular reports on grievance trends and resolutions shared with stakeholders.
11. Monitor for any signs of retaliation against those who raise grievances, ensuring that the mechanism operates without fear of negative consequences.
12. Assess if the grievances and resolutions inform project improvements and adjustments to policies or practices. This should be used to improve the Project practices for the satisfaction of all and environmental as well as social sustainability.
13. Evaluate whether there is a regular review of the grievance mechanism itself to identify gaps, i.e., areas for improvement.
14. Analyse data on grievances to identify patterns or recurring issues that may need to be addressed systematically.

15. Monitor the demographics of those submitting grievances to ensure inclusivity.

The above-listed aspects will need to be monitored (and improved where necessary) to ensure that the grievance mechanism remains effective, responsive, and aligned with stakeholder needs. The internal grievance mechanism will follow the same approach as the external grievances, with the difference that the complainant would be the workers or site visitors and not stakeholders.

Stakeholder and public engagements should be monitored and reported by Telfs Investments throughout the duration of the project, and this will involve the following:

- Continuous updating of the stakeholder list,
- Recording of all consultations held, and
- Recording of all grievances received and dealt with.

6.2.5 Management of Information

All the meetings and interactions related to the project engagement should be recorded by Telfs Investments through the following:

- Stakeholder list
- Grievance Mechanism Log,
- Minutes of all meetings with stakeholders, and
- Meeting attendance registers.

Appendix 1: Chance Finds Procedure (CFP) after Kinahan, 2020

Areas of proposed activities are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found during development work. The procedure set out here covers the reporting and management of such finds.

Scope: The “*chance finds*” procedure covers the actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “*a person who discovers any archaeological object must as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that heritage reported to the NHC is correctly identified in the field.

Manager/Supervisor must report the findings to the following competent authorities:

- **National Heritage Council (NHC) of Namibia: +264 61 244 375**
- **NHC of Namibia (Technical Office): +264 61 301 903**
- **National Museum: +264 61 276 800**
- **National Forensic Laboratory: +264 61 240 461.**

Archaeological material must NOT be touched. Tampering with the materials is an offence under the Heritage Act and punishable upon conviction under the law.

Responsibility:

Operator:	To exercise due caution if archaeological remains are found
Foreman:	To secure the site and advise management timeously
Superintendent:	To determine the safe working boundary and request an inspection
Archaeologist:	To inspect, identify, advise management, and recover remains

Procedure:

Action by a person identifying archaeological or heritage material:

- a) If operating machinery or equipment, stop work
- b) Identify the site with flag tape

- c) Determine GPS position if possible
- d) Report findings to the foreman

Action by the foreman

- a) Report findings, site location, and actions taken to the superintendent
- b) Cease any works in the immediate vicinity

Action by the superintendent

- a) Visit the site and determine whether work can proceed without damage to findings
- b) Determine and mark the exclusion boundary
- c) Site location and details to be added to the project GIS for field confirmation by the archaeologist

Action by an Archaeologist

- a) Inspect the site and confirm the addition to the project GIS
- b) Advise NHC and request written permission to remove findings from the work area
- c) Recovery, packaging, and labeling of findings for transfer to the National Museum

In the event of discovering human remains:

- a) Actions as above
- b) Field inspection by an archaeologist to confirm that the remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to the National Museum or the National Forensic Laboratory, as directed.