ENVIRONMENTAL MANAGEMENT PLAN (EMP)

EXCLUSIVE PROSPECTING LICENCE (EPL) 9892

Southern Namibia (Noordoewer / South African Border Vicinity)

Prepared for: Profile Energy (Pty) Ltd

ECC Submission Package – Exploration incl. RC & Diamond Drilling

Date: 22 February 2026

Document Control

Document Title	Environmental Management Plan (EMP) – EPL9892
Proponent	Profile Energy (Pty) Ltd
EPL	EPL 9892
EPL Size	19,362 hectares
Commodity Suite	Cu, Ni, Au, Li, Ta
Exploration Envelope	Reconnaissance, mapping, geochemical sampling, geophysics, trenching (if required), RC drilling, diamond drilling, temporary camps/laydowns
Prepared By	[Insert Consultant / Author]
Document Status	Draft for Submission / Final for Submission
Revision	Rev 0
Application Number	25033005524

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Document Control 2

Abbreviations

Abbreviation	Meaning
CAPA	Corrective and Preventive Action
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
HSE	Health, Safety and Environment
IAS	Invasive Alien Species
IC	Incident Controller
MoC	Management of Change
RC	Reverse Circulation
SDS	Safety Data Sheet

Environmental Management Plan (EMP) – EPL9892

This EMP is structured to meet ECC submission expectations for exploration activities. Update the Table of Contents field after editing.

1. Introduction and Purpose

This Environmental Management Plan (EMP) sets out the management measures, roles and responsibilities, monitoring requirements and reporting systems to ensure that exploration activities on EPL 9892 are undertaken in a manner that prevents pollution, minimises disturbance, protects sensitive receptors (including water resources, land uses and biodiversity), and ensures progressive rehabilitation and auditable closure. The EMP is designed to be field-implementable: each key control is linked to measurable indicators, assigned responsibilities, checking frequencies and evidence records suitable for ECC compliance inspection.

2. Project and Site Context

EPL 9892 (19,362 ha) is located in southern Namibia in the vicinity of Noordoewer near the border with South Africa. The regional setting is arid to semi-arid, with episodic rainfall events, high evaporation and frequent wind conditions that increase dust risk and make erosion initiation a key concern after disturbance. Surface drainage is generally ephemeral; however, defined drainage lines and livestock waterpoints require conservative buffers and disciplined fuel, waste and sanitation controls. The proponent, Profile Energy (Pty) Ltd, intends to explore for Cu, Ni, Au, Li and Ta using reconnaissance, mapping, geochemical sampling, geophysics, and—where warranted—RC and diamond drilling with temporary drill pads, sumps (if required) and support logistics.

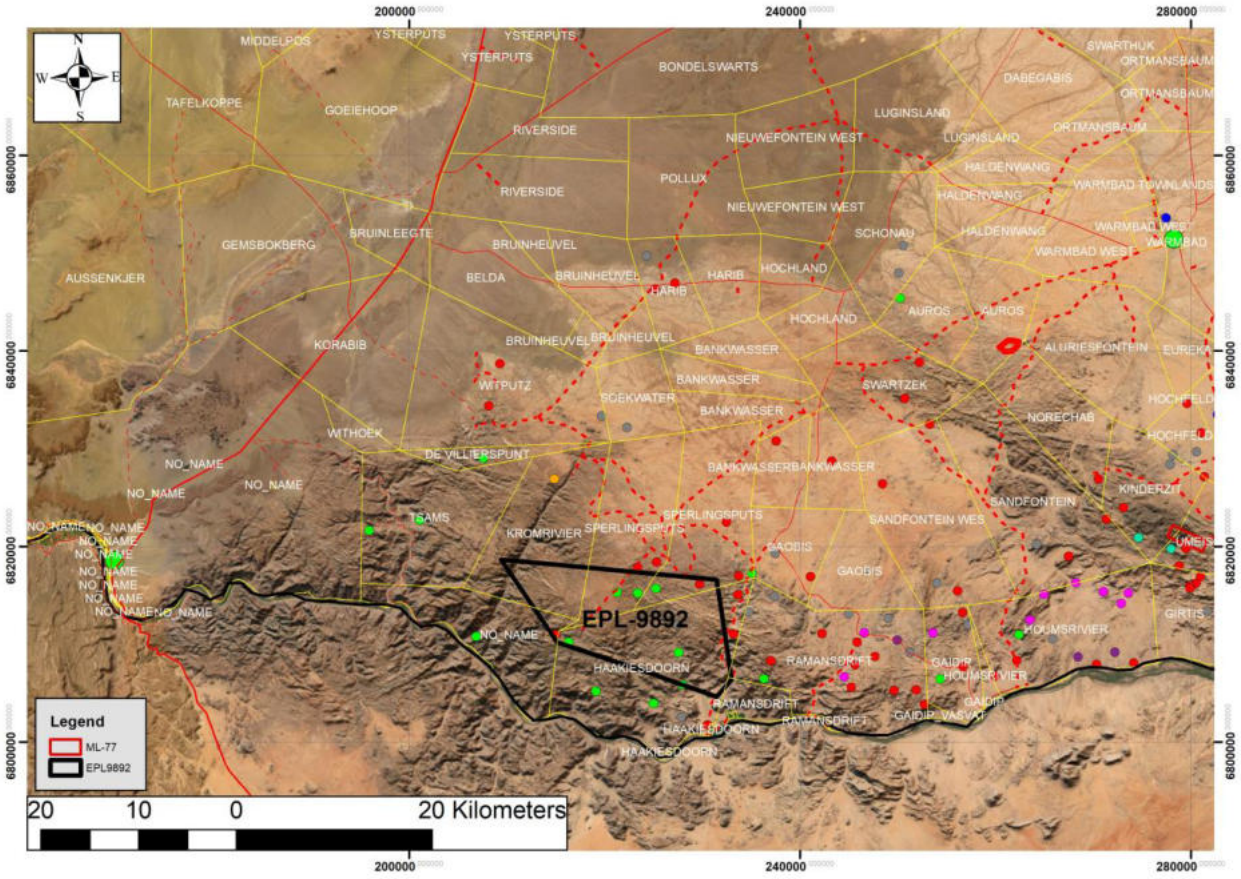

Figure 1. Location Map for EPL9892

3. EMP Scope and Applicability

This EMP applies to all exploration-related actions and support activities within EPL 9892, including access and route use, vehicle movement, establishment of temporary camps or staging areas, sampling, geophysics, trenching/pitting (if required), RC and diamond drilling, storage and handling of fuels and hazardous substances, waste management and sanitation, rehabilitation and closure, and emergency response. Mining, bulk sampling at mining scale, permanent infrastructure, processing plants and permanent waste facilities are excluded unless separately assessed and authorised.

4. Roles, Responsibilities and Competency (Stop-Work Authority Included)

4.1 Proponent / EPL Holder (Accountable Executive)

The Proponent retains overall accountability for compliance with the ECC conditions and the implementation of this EMP. The Proponent must ensure adequate resourcing (competent Site Supervisor,

ECO, trained contractors, equipment, and budgets for rehabilitation), approve key operational controls (route approval plan, sensitive area buffers), and ensure that non-compliances are corrected promptly. The Proponent is also responsible for ensuring that contractor agreements incorporate EMP requirements as binding obligations and that repeated non-compliance results in escalation, sanctions, or contractor replacement where needed.

4.2 Site Supervisor / Exploration Manager (Incident Controller on Site)

Roles and responsibilities are defined to ensure clear accountability and effective implementation. The Proponent remains accountable for ECC compliance and resourcing. The Site Supervisor manages day-to-day implementation, including registers, route discipline, inspections and corrective actions. The ECO provides compliance oversight and verifies close-out evidence. The HSE function integrates safety and environmental controls (training, emergency readiness, incident investigation). Contractors (including drill contractors) must comply with EMP requirements, maintain their own logs and execute rehabilitation within scope. Drivers have a critical control role and must comply with approved routes and speed limits. Any worker may initiate stop-work where imminent risk to life or serious environmental harm exists; work resumes only once controls are in place and documented.

The Site Supervisor is responsible for day-to-day implementation of the EMP, including route discipline, field team control, housekeeping, and ensuring that method statements are followed. The Site Supervisor must maintain the core registers (disturbance register, waste logs, incident register, complaints register), ensure inspections occur at defined frequencies, and coordinate corrective actions and rehabilitation close-out. The Site Supervisor acts as the default **Incident Controller** for emergencies until relieved by a more senior competent person.

4.3 Environmental Control Officer (ECO)

The ECO provides independent compliance oversight and verifies that mitigation measures are implemented and effective. The ECO conducts routine inspections (weekly or more frequent during high-intensity phases), confirms buffer compliance around drainages/waterpoints, verifies rehabilitation closure criteria, and issues corrective actions with deadlines. The ECO maintains inspection records suitable for audit and supports reporting to authorities if required by ECC conditions.

4.4 HSE Officer / HSE Function

The HSE function integrates worker safety and environmental risk controls, ensuring that inductions include environmental rules (no-go areas, waste rules, spill response, heritage chance finds), that emergency

readiness is maintained, and that incidents are investigated with root-cause analysis and CAPA tracking. The HSE function also manages driving rules, fatigue management, and roadworthiness systems.

4.5 Contractors (Including Drill / Earthworks / Camp Service Providers)

All contractors must comply with the EMP and any project-specific method statements. Contractors are responsible for maintaining their own operational logs (refuelling logs, maintenance logs, housekeeping checklists), providing evidence to the Site Supervisor/ECO, and implementing corrective actions and rehabilitation within their scope. Where drilling is undertaken, the drill contractor must comply with additional controls for sumps/cuttings management and spill prevention.

4.6 Drivers (Critical Control Role)

Drivers must comply with approved routes only, speed limits, convoy spacing rules, livestock/wildlife hazard rules, and dust controls. Any route deviation, speeding pattern, or unsafe driving behaviour is treated as a major non-compliance due to its strong link to track proliferation, collisions, dust nuisance and stakeholder conflict.

4.7 Stop-Work Authority (Mandatory)

Any person on site has the authority and duty to **stop work** if there is an imminent risk to human safety or a credible risk of serious environmental harm (e.g., fuel spill migrating toward a drainage line, entering a no-go buffer, major sanitation failure, uncontrolled fire). Work may resume only once the Site Supervisor and ECO (and HSE where relevant) confirm that the risk is controlled and corrective measures are in place and documented.

5. Induction, Training, Communication, Documentation and Management of Change

5.1 Induction (before starting work)

All personnel and contractors must receive a site induction prior to commencing work. Induction must cover:

- EMP purpose and “non-negotiables” (approved routes only; drainage/waterpoint buffers; no dumping/burning; spill response; no open defecation; zero wildlife harassment; heritage chance-find stop-work);
- roles, reporting lines and stop-work authority;

- emergency contacts, incident reporting and response expectations;
- disciplinary consequences for major non-compliances (route proliferation, illegal disposal, unsafe refuelling, wildlife harassment).

Evidence: signed Induction Register; toolbox talk records.

5.2 Training and competency (role-based)

Minimum training requirements include:

- spill response training for refuelling personnel and supervisors;
- first aid (at least one trained person per team/crew);
- driver safety and off-road discipline training;
- ECO/site supervisor training in registers, evidence capture, and CAPA close-out;
- heritage chance-find awareness for all crews involved in ground disturbance.

5.3 Toolbox talks (routine reinforcement)

Short toolbox talks must be held:

- weekly during active operations (and daily during drilling mobilisation or high-risk periods), focusing on current risks: dust/winds, route discipline, refuelling, drainage crossings, erosion risk post-rainfall.

5.4 Communication (stakeholders and internal)

Maintain clear communications with landowners/occupiers regarding access, timing of high-traffic activities, and any incidents that may affect land use (spills, fires, fence damage, livestock collision). Internally, ensure that route approvals and no-go zones are communicated via maps, GPS files, and briefings.

5.5 Documentation and document control

Keep the latest controlled copies of:

- EMP and method statements;
- route approvals and sensitive area maps;
- registers/logs;

- SDS for hazardous substances;
- emergency contact sheet.

5.6 Management of Change (MoC)

MoC must be triggered when:

- footprint or activity intensity increases materially (e.g., drilling added, new camps, new water abstraction, additional clearing);
- new sensitive receptors are identified (waterpoints, heritage, high erosion areas);
- repeated incidents indicate controls are ineffective.

MoC requires: change description → risk review → revised controls → approvals → training/toolbox updates → register update.

All personnel and contractors must receive induction prior to work, covering EMP non-negotiables (approved routes only, buffers, no dumping/burning, spill response, no open defecation, heritage chance-find stop-work), roles, emergency contacts and reporting expectations. Training is role-based (spill response, first aid, driver safety, ECO/Supervisor register and evidence handling, chance-find awareness). Toolbox talks reinforce current risks (winds/dust, refuelling, drainage crossings, erosion post-rain). Document control ensures latest versions of the EMP, maps and registers are used. Management of Change (MoC) is triggered for material scope escalation, new sensitive receptors, or repeated failures, requiring a risk review, updated controls, communication and verification.

6.1 Footprint and Access Control

6.1.1 Objective and performance standard

The objective is to prevent uncontrolled disturbance ("track proliferation"), reduce erosion initiation, protect drainage features and waterpoints, and avoid access conflicts by ensuring that **all movement and disturbance occurs only within approved footprints**. Footprint control is the primary determinant of environmental performance for exploration EMPs and is therefore treated as a **critical control** for EPL9892.

Performance standard (non-negotiables):

- All vehicles remain on **approved routes** only; no off-route driving except for verified emergencies and only with documented approval/close-out.

- New routes/spurs are **minimised**, temporary by design, and rehabilitated progressively.
- Buffer rules to drainages/waterpoints are applied at all times.
- All gates/fences are respected and returned to original condition after access.

6.1.2 Scope

Applies to all project vehicles and contractors including mapping, sampling, geophysics, trenching, and **RC/diamond drilling** mobilisation and operations, including all support logistics.

6.1.3 Route approval system (Route Management Procedure)

(a) Route classification

Routes are managed under three classes:

1. **Class A – Existing public roads** (e.g., proclaimed gravel roads): preferred access.
2. **Class B – Existing farm/communal tracks**: used with permission; preferred over creating new spurs.
3. **Class C – New temporary spurs** (last resort): must be approved, pegged, minimal width, and rehabilitated immediately after use.

(b) Route approval workflow (mandatory)

No new access or spur may be used unless the following are completed:

1. **Route request** submitted by the Site Supervisor/contractor (purpose, map, alternatives considered).
2. **Desktop screening** using satellite imagery/DEM + known sensitive features (drainages, steep ground, waterpoints, residences).
3. **Field walkover** (where practical) by Site Supervisor/ECO for any Class C spur, drill access, or trench access.
4. **Approval issued** with:
    - route ID; GPS track file; maximum width; buffer constraints; any "no-go" micro-zones; conditions (speed limits, seasonal restrictions).
5. **Communication**: route distributed to all drivers/teams (GPS upload + toolbox talk).

6. **Close-out plan**: pre-defined rehab steps and closure trigger.

(c) Route demarcation and width control

- Route width is limited to the minimum safe width (generally **existing track width**; new spurs to be **single-lane where feasible**).
- **Track braiding** (creating parallel tracks) is prohibited. If a segment becomes corrugated or rough, the response is **speed reduction**, not widening.

6.1.4 GPS tracking requirements (compliance backbone)

- All field vehicles must use either:
    - (i) dedicated GPS trackers with downloadable logs, or
    - (ii) daily GPX track recording via approved devices/apps with date-stamped files.
- GPS logs must be:
    - downloaded at least **weekly** (daily during drilling mobilisation);
    - checked against approved route layers;
    - archived in the project compliance folder.

Non-compliance threshold: any unexplained deviation triggers a formal incident entry and corrective action (Section 8 CAPA).

6.1.5 Drainage and waterpoint buffers (link to 6.4)

Because EPL9892 includes arid drainage systems that concentrate flow during episodic events, conservative buffers are required:

(a) Drainage buffers

- No new tracks, camps, refuelling, waste storage, sanitation, or drill pads **within the defined drainage buffer**, unless a crossing is specifically approved.
- **Default buffer:** *minimum 50 m from the edge of defined channels/ephemeral watercourses*, increased where slopes, erodible soils, or evidence of flood conveyance is present.
- Crossings must be:

- limited in number;
- positioned at stable, narrow sections;
- stabilised as required (erosion controls);
- inspected after rainfall.

(b) Waterpoint buffers

- Treat stock waterpoints, troughs, boreholes, and associated infrastructure as **high-sensitivity receptors**.
- **Default buffer:** *minimum 100 m* for camps, refuelling, hazardous storage and sanitation; vehicle passage near waterpoints must be slow and controlled.

6.1.6 Gate and fence procedure (land access integrity)

- Access through gates requires permission and adherence to "leave as found":
  - if closed → close after passing; if open → leave open unless instructed otherwise.
- No cutting of fences except in emergencies, and only with landowner approval and immediate repair.
- Any fence/gate damage must be recorded and repaired promptly, with photographic evidence.

6.1.7 Emergency off-route driving (exception procedure)

Off-route driving is only allowed if:

- there is an immediate safety risk (medical emergency, vehicle recovery from dangerous position), and
- the shortest practical deviation is taken, and
- the deviation is logged in the **Incident Register** with GPS evidence and rehabilitation actions.

6.1.8 Embedded mini monitoring table (6.1)

Measure / control	Monitoring indicator	Responsibility	Frequency	Evidence
Route approval system implemented	All Class B/C routes have approval IDs and conditions	Site Supervisor; ECO	Ongoing; weekly review	Route approval forms; route map pack
GPS tracking compliance	% vehicles with logs; deviations investigated	Site Supervisor; HSE	Weekly (daily during drilling mobilisation)	GPX files; deviation log; CAPA records
Drainage/waterpoint buffers respected	Zero disturbances within buffers (except approved crossings)	ECO; Site Supervisor	Weekly; post-rain	Inspection logs; GPS points; photos
Gate/fence procedure followed	No unresolved access complaints; repairs completed	Site Supervisor	Ongoing; monthly review	Stakeholder log; repair photos
Track braiding prevented	No new parallel tracks observed	ECO	Weekly	Inspection photos; corrective actions

Objective: prevent track proliferation, reduce erosion initiation, protect drainage features and waterpoints, and avoid access conflicts by ensuring all movement and disturbance occurs only within approved footprints.

Non-negotiables: approved routes only; no off-route driving except documented emergencies; buffers to drainages/waterpoints respected; gates/fences left as found and repaired if damaged.

Method Statement: route classification (A/B/C); route approval workflow (request → screening → walkover → written approval → communication → close-out); width control and no braiding; GPS tracking and reviews; drainage buffers (≥50 m default) and controlled crossings; waterpoint buffers (≥100 m default); gate/fence procedure; emergency off-route procedure.

Monitoring: route approvals; GPX logs; buffer compliance; complaints; track braiding observations, with evidence (forms, GPX files, photos, CAPA).

6.2 Vegetation Clearing & Invasive Species

6.2.1 Objective and performance standard

The objective is to minimise vegetation disturbance, avoid unnecessary habitat fragmentation, prevent invasive alien species establishment along disturbed corridors, and ensure that any clearing is strictly limited to approved footprints and tied to rehabilitation close-out.

Performance standard:

- Vegetation clearing occurs **only within approved routes/pads** (Section 6.1).
- Clearing is minimised, selective, and avoids drainage-associated vegetation.
- Disturbed areas are stabilised and rehabilitated progressively to reduce invasion risk.
- Any invasive outbreaks are treated early and recorded.

6.2.2 Clearing limits and approval linkage

- Clearing is only permitted where a route/pad has an approval ID with defined width/area.
- Any request to widen a route or clear additional area triggers **Management of Change (MoC)** and route re-approval.

6.2.3 No-go vegetation zones (default rules)

- No clearing within drainage buffers or riparian-like strips (link to 6.1/6.4).
- Avoid clearing mature trees and dense shrubs where micro-siting can achieve the same access objective.
- Avoid clearing around waterpoints and grazing concentration areas to prevent increased dust and erosion.

6.2.4 Clearing method (low-impact technique)

- Use hand clearing where feasible for small work areas (geophysics lines, sampling access).
- Mechanical clearing (if needed for drill pads/access) must:
    - be limited to the minimum safe width;
    - avoid pushing vegetation into drainage pathways;

- avoid creating windrows that channel water unless designed as erosion controls.

6.2.5 Vegetation handling and topsoil interface (link to 6.3)

- Where soils permit, strip and stockpile topsoil separately from subsoil, keeping stockpiles low and stable.
- Use cleared brush strategically for **brush packing** to:
  - stabilise surfaces;
  - reduce wind erosion and dust;
  - block closed tracks to prevent re-use (reinforces 6.11 closure).

6.2.6 Invasive Alien Species (IAS) prevention and response

(a) Prevention

- Vehicles and equipment arriving from other sites must be clean and free of seed-bearing material.
- Avoid moving through known weed patches where practicable.
- Do not import hay/soil/gravels unless sources are controlled and weed-free.

(b) Surveillance and rapid response

- ECO inspections include IAS checks along:
  - camps, pads, crossings, and frequently used tracks.
- Any IAS sightings trigger:
  - recording in IAS Register (GPS + photos);
  - treatment plan (mechanical removal or approved herbicide use by competent personnel);
  - follow-up inspection after rains.

6.2.7 Monitoring table (6.2)

Measure / control	Monitoring indicator	Responsibility	Frequency	Evidence
Clearing tied to route/pad approvals	Zero unauthorised clearing	Site Supervisor; ECO	Weekly	Inspection logs; GPS overlays
No clearing in drainage buffers	Buffer compliance maintained	ECO	Weekly; post-rain	Photos; GPS points
Brush used for stabilisation/closure	Closed spurs blocked; reduced dust	Contractor; Site Supervisor	As cleared; weekly	Rehab photos; closure notes
IAS prevention (clean equipment)	Equipment washdown checks completed	Contractor supervisors	At mobilisation	Checklists; photos
IAS surveillance & response	IAS sightings logged and treated	ECO; Site Supervisor	Weekly; after rains	IAS Register; treatment records

Objective: minimise vegetation disturbance, avoid fragmentation, prevent IAS establishment, and ensure clearing occurs only within approved footprints (6.1) and is tied to rehabilitation close-out.

Method Statement: clearing linked to approval IDs; MoC for widening; avoid drainage buffers and waterpoints; low-impact clearing; manage topsoil/brush for stabilisation and closure; IAS prevention (clean equipment, avoid importing seed); surveillance and rapid response with GPS/photo records.

Monitoring: unauthorised clearing; buffer compliance; closure brush packing; IAS log and treatment records

6.3 Soils, Erosion Control and Stormwater Management

6.3.1 Objective and performance standard

The objective is to prevent erosion initiation and stormwater concentration associated with exploration disturbance (tracks, pads, trenches), recognising that arid systems may remain stable during dry periods but can fail rapidly during intense rainfall events. This section explicitly integrates:

- (i) **drainage buffers and controlled crossings** (Section 6.1), and
- (ii) **clearing limits and topsoil handling** (Section 6.2).

Performance standard:

- No persistent rilling, gullying, or sediment delivery to drainage lines from project disturbances.
- Stormwater is dispersed (sheet flow) rather than channelised.
- Progressive rehabilitation prevents erosion legacy and dust generation.

6.3.2 Erosion risk areas (screening rules)

Higher-risk areas include:

- sloping track segments and track approaches to drainage crossings;
- soils prone to dispersion/crusting;
- disturbed zones with exposed subsoil;
- spoil piles and trenching areas;
- compacted drill pads that shed runoff.

These areas must receive priority controls and post-rain checks.

6.3.3 Soil handling and protection (topsoil management)

- Avoid disturbance during saturated conditions (rutting becomes erosion initiation points).
- Where disturbance is unavoidable:
    - strip topsoil (where present) and store separately;
    - keep stockpiles low, stable, and outside drainage buffers;

- do not place stockpiles in flow paths.

6.3.4 Stormwater management controls (track/pad level)

(a) Roads and tracks

- Maintain natural cross-drainage; do not create berms that trap or divert flow along tracks.
- Install **water bars/turnouts** on sloping segments to direct runoff off the track at regular intervals (spacing adjusted to slope and soil erodibility).
- Prohibit track braiding and widening (Section 6.1), because widening increases exposed erodible surfaces.

(b) Drill pads and laydowns

- Site pads away from drainage buffers (Section 6.1) and avoid natural flow lines.
- Design pads to avoid concentrating runoff; install diversion berms only where they disperse flow safely.
- Stabilise pad edges and any sumps (if used) to prevent overtopping and sediment release.

(c) Trenches and spoil (if trenching occurs)

- Place spoil on the upslope side where practicable and shape spoil to avoid runoff capture.
- Backfill and re-contour promptly; do not leave open trenches through rainy periods.

6.3.5 Post-rainfall inspections (mandatory trigger)

After significant rainfall:

- inspect crossings, sloping tracks, pads, trench sites, and rehab sites;
- repair rills immediately (re-contour + water bars + brush packing/rock checks);
- update method if repeated failures occur (MoC trigger).

6.3.6 Monitoring table (6.3)

Measure / control	Monitoring indicator	Responsibility	Frequency	Evidence
Topsoil/stockpile management	Stockpiles stable; not in flow paths	Site Supervisor; ECO	Weekly; post-rain	Photos; inspection notes
Track runoff control (water bars/turnouts)	No channelised runoff along tracks	Contractor; ECO	Weekly; post-rain	Inspection logs; repair records
Pad runoff control	No erosion at pad edges; no sediment fans	Drill contractor; ECO	Weekly; post-rain	Drill pad checklist; photos
Trench/spoil management	Trenches closed; spoil stabilised	Contractor; ECO	Weekly; pre-rain season	Close-out forms; photos
Post-rain verification	Repairs completed within set timeframe	Site Supervisor; ECO	After rainfall events	Post-rain log; CAPA close-out

Objective: prevent erosion initiation and stormwater concentration from tracks, pads and trenches, integrating drainage buffers/crossings (6.1) and clearing/topsoil controls (6.2).

Method Statement: avoid disturbance during saturated conditions; separate topsoil; stable stockpiles; maintain cross-drainage; prevent channelised flow; install water bars/turnouts; micro-site pads away from flow lines; stabilise edges; manage trenches/spoil; mandatory post-rain inspections and repairs; MoC for repeat failures.

Monitoring: stockpile stability; water bars; pad and crossing stability; post-rain repairs documented.

6.4 Water Resources Protection (Surface Water + Groundwater)

6.4.1 Objective and performance standard

The objective is to prevent pollution, sedimentation, and hydrological alteration of surface drainage features and groundwater resources within **EPL9892** and its downstream receiving environment, recognising that arid systems may have low baseline flow but can convey contaminants rapidly during episodic rainfall events. Water protection is achieved through **avoidance (buffers and siting)**, **runoff/erosion control**, **strict hazardous substance management**, and **disciplined drilling water/cuttings management**.

Performance standard (non-negotiables):

- No refuelling, hazardous storage, waste storage, sanitation, or drill sumps within drainage buffers or waterpoint buffers (Section 6.1), unless explicitly authorised and engineered.
- No discharge of hydrocarbons, chemicals, sewage, greywater, or drill-related fluids to the environment.
- No sediment-laden runoff from pads/roads delivered into drainage lines.
- Any spill with a credible pathway to a drainage line or waterpoint triggers **stop-work** and emergency response.

6.4.2 Applicability

Applies to all exploration activities and support infrastructure, including camps, laydowns, drill pads, sumps (if used), and vehicle movement. Applies to both **RC and diamond drilling**.

6.4.3 Surface water protection (ephemeral drainages and crossings)

(a) Buffer compliance and micro-siting (primary control)

All controls in this section are anchored to the **drainage buffers and waterpoint buffers** in **6.1**.

- Camps, sanitation, waste storage, refuelling, and hazardous storage must be outside the specified buffers.
- Drill pads must be micro-sited to avoid natural flow paths and drainage connectivity.
- Any disturbance proposed within buffer zones requires **Management of Change (MoC)** and ECO review with written justification and additional controls.

(b) Drainage crossings (controlled, minimal, stabilised)

Crossings are allowed only where explicitly approved under the route approval system (6.1):

- minimise number of crossings;
- use stable, narrow sections;
- maintain natural drainage function (do not dam channels);
- stabilise approaches (rock armouring/brush packing/water bars) where rutting is likely;
- post-rain inspections are mandatory (Section 7 post-rain log).

(c) Sediment control and stormwater interface (link to 6.3)

- Maintain sheet flow by preventing track berms and channelised flow along routes.
- Install water bars/turnouts on sloping tracks and near crossings.
- Stabilise disturbed ground on pads and laydowns to prevent sediment fans.
- After rainfall events, repair rills immediately and document close-out.

6.4.4 Groundwater protection (boreholes, abstraction, contamination prevention)

(a) Abstraction principles and permissions

- Water use must be minimised; prefer **carted water** where feasible to reduce new borehole risks.
- If abstraction from existing boreholes is required, obtain permission from the legal owner/authority and comply with applicable water authorisations (as per the compliance matrix).
- Do not abstract water in a manner that compromises local users (livestock waterpoints, farming operations).

(b) Protection of boreholes and waterpoints

- Waterpoints are treated as critical receptors: no refuelling, hazardous storage, waste storage, sanitation, or workshops within the waterpoint buffer (default 100 m unless otherwise agreed).
- All work near boreholes must include drip trays and a spill kit on hand.

(c) Pollution prevention (groundwater pathways)

Key pathways to groundwater include infiltration from spills, poorly managed waste, and contaminated runoff concentrating into fractures or sandy substrates. Controls therefore include:

- strict fuel/hazardous controls (Section 6.5);
- no discharge of greywater/sewage to ground (Section 6.6);
- remove contaminated soils and dispose legally (Sections 6.5 and 6.6);
- avoid soak pits unless specifically designed, authorised, and located outside sensitive zones.

6.4.5 Drilling water, cuttings and fluids management (RC + diamond)

(a) RC drilling (air/foam and cuttings)

- Use additives only if required; keep to the minimum effective dosage and maintain SDS on site.
- Cuttings must be managed to prevent spread into drainage lines:
    - place cuttings on stable ground outside buffers;
    - shape/compact cuttings piles to reduce wind and runoff mobilisation;
    - prevent cuttings wash-off by using berms/brush packing where needed.
- No cuttings may be placed in channels or within drainage buffers.

(b) Diamond drilling (water-based fluids)

- Use closed-loop or controlled circulation where feasible to minimise discharge.
- If sumps are used (only where required):
    - locate outside drainage buffers;
    - line sumps where soils are permeable or where contamination risk exists;
    - prevent overtopping;
    - backfill/close sumps after use and rehabilitate (Section 6.11).

- All drilling fluid additives must have SDS available; mixing must occur on drip trays with spill kits present.

(c) Washdown controls (no uncontrolled discharge)

- Vehicle/equipment washdown is prohibited except at designated areas with containment and appropriate disposal.
- No washdown within drainage buffers or near waterpoints.

6.4.6 Monitoring and corrective actions

- ECO verifies buffer compliance, crossing stability, and evidence of sediment delivery.
- Any erosion feature with connectivity toward drainages triggers immediate repair and CAPA.
- Any suspected water contamination event triggers stop-work and incident response (Section 9).

6.4.7 Monitoring table (6.4)

Measure / control	Monitoring indicator	Responsibility	Frequency	Evidence
Drainage/waterpoint buffers implemented (link 6.1)	Zero prohibited activities within buffers	ECO; Site Supervisor	Weekly; post-rain	Inspection logs; GPS points; photos
Controlled crossings only	Crossings approved and stable; no erosion	Site Supervisor; ECO	Weekly; post-rain	Route approvals; post-rain log; photos
Sediment control (link 6.3)	No sediment fans entering channels	ECO; Contractor	Weekly; post-rain	Inspection logs; repair records
Drilling cuttings/sumps managed	Cuttings stable; sumps lined/closed where required	Drill contractor; ECO	Weekly; at demobilisation	Drill pad checklist; photos; close-out forms
No discharge of wastewater/drill fluids	Zero uncontrolled discharge events	Site Supervisor; HSE	Continuous; monthly review	Incident register; CAPA close-out

Objective: prevent pollution, sedimentation and hydrological alteration of surface drainage features and groundwater resources.

Non-negotiables: no prohibited activities within buffers (6.1) unless authorised; no discharge of hydrocarbons, chemicals, sewage, greywater or drill fluids; no sediment delivery into channels; spills with pathways trigger stop-work.

Method Statement: buffer compliance and micro-siting; controlled crossings; sediment control via 6.3; minimise abstraction and prefer carted water; protect boreholes/waterpoints; prohibit washdown unless contained; drilling cuttings and sump management (RC and diamond), SDS on site.

Monitoring: buffer compliance; crossing stability; absence of sediment fans; drilling cuttings/sumps controls; no discharge events.

6.5 Fuel, Hazardous Substances and Spill Prevention/Response

6.5.1 Objective and performance standard

The objective is to prevent hydrocarbon and chemical contamination of soils and water resources and to ensure rapid containment and effective remediation if releases occur. This is a **critical control** section because spills can create high-consequence impacts even in low-intensity exploration programmes.

Performance standard (non-negotiables):

- No refuelling or hazardous substance storage within drainage or waterpoint buffers (Section 6.1) unless specifically authorised and engineered.
- All fuel and hazardous substances are stored with secondary containment (bunding/drip trays) and managed using approved procedures.
- Spill kits are present, complete, and staff are trained.
- Any spill with a pathway to drainage/waterpoint triggers **stop-work**, escalation, and documented remediation close-out.

6.5.2 Applicability

Applies to fuel storage, refuelling, lubricants, drilling additives, batteries, solvents, paints, and any hazardous materials used by field crews, camps, and the drill contractor.

6.5.3 Inventory control, SDS and approvals

- Maintain a **Hazardous Substances Register** listing: product name, quantity, storage location, SDS availability, and expiry date where relevant.
- Maintain SDS for all hazardous substances (fuel, oils, greases, drilling additives, cleaning chemicals).
- Substitution principle: use the least hazardous product feasible (e.g., avoid high-toxicity degreasers where alternatives exist).
- Any new chemical introduced triggers MoC review and register update.

6.5.4 Storage requirements (bunding and segregation)

(a) Storage siting (avoidance)

- Locate storage outside drainage and waterpoint buffers.
- Select stable, flat ground with low runoff connectivity.
- Keep storage areas away from ignition sources and high-traffic zones.

(b) Secondary containment (bunding)

- Bulk storage (if any) must be bunded to at least **110% of the largest container** within the bunded area (or as required by company standard/contract).
- Drums/jerry cans must be stored on pallets in bunded trays or within portable bunds.
- Bunds must be kept free of accumulated rainwater contaminated with hydrocarbons; any contaminated water must be managed as hazardous waste.

(c) Segregation and labelling

- Clearly label all containers; keep lids closed.
- Segregate incompatible chemicals (e.g., acids vs oxidisers) if any are used.
- Store absorbents and spill equipment adjacent to storage.

6.5.5 Refuelling procedure (step-by-step, mandatory)

Refuelling is only permitted at designated refuelling points approved under the route/footprint system.

(a) Pre-refuelling controls

1. Confirm refuelling point is outside buffers and on stable ground.
2. Place drip tray under refuelling interface where practicable.
3. Ensure spill kit is within immediate reach.
4. Check hose/nozzle integrity; verify container condition.
5. Switch off engine; prohibit smoking/open flames.

(b) During refuelling

6. Refuel slowly to prevent splashing/overfilling.
7. Maintain continuous supervision; do not leave nozzle unattended.
8. Use funnels or closed transfer pumps for drums/jerry cans.

(c) Post-refuelling

9. Check for leaks; wipe down and secure caps.
10. Remove contaminated absorbents to hazardous waste container.
11. Record refuelling event if bulk transfers occur (refuelling log).

6.5.6 Drill contractor fuel and chemicals (special controls)

- Drill rigs must have:
    - drip trays under stationary leak points;
    - spill kits on the rig;
    - daily checks for hydraulic leaks, hose integrity, and fittings.
- Any persistent leak is a **stop-work trigger** until repaired.
- Additive mixing must be conducted on containment (drip tray/lined area) with SDS available.

6.5.7 Spill response procedure (tiered, step-by-step)

(a) Spill classification

- **Minor:** <5 L, fully contained on hardstand/tray, no migration.
- **Moderate:** 5–200 L or minor spill with migration potential.
- **Major:** >200 L, or any spill with a pathway to drainage/waterpoint, or any spill not rapidly contained.

(b) Immediate spill response steps (ALL spills)

1. **Stop work** and **stop the source** (close valve, upright container, shut off pump).
2. **Eliminate ignition sources** (engines off, no smoking).

3. **Contain** the spill (booms, sand/soil berm, absorbent socks).
4. **Protect receptors**: place booms/berms downslope and toward any drainage line.
5. **Recover** product where possible (pump into container; use absorbents).
6. **Remove contaminated materials** (absorbents/soil) and store as hazardous waste.
7. **Notify** Site Supervisor + ECO immediately; escalate for moderate/major spills.
8. **Document** (GPS, photos, estimated volume, actions taken).
9. **Remediate** (excavate impacted soil until visual/odour staining removed).
10. **Dispose legally** using licensed hazardous waste route; retain receipts.
11. **Close-out inspection** by ECO and CAPA entry (root cause + prevention).

(c) Special rule: spills near drainages/waterpoints

Any spill within or near a buffer, or where runoff could reach a drainage line, triggers:

- immediate stop-work;
- rapid berming/booming;
- potential excavation and removal of soil;
- authority/landowner notification as required by ECC and access agreements;
- follow-up inspection after rainfall event.

6.5.8 Minimum spill kit specification (by location)

(a) Vehicle spill kit (minimum)

- Absorbent pads (oil-only) – minimum 10–20
- Absorbent socks/booms – at least 1–2
- Granular absorbent (or equivalent) – ~2–5 kg
- Heavy-duty waste bags + cable ties
- Nitrile gloves + safety glasses

- Small shovel/trowel
- Instruction card (spill steps + contacts)

(b) Refuelling point / camp / laydown spill kit (minimum)

- Absorbent pads – 50+
- Booms/socks – 4–6
- Granular absorbent – 20 kg (or equivalent)
- Shovel + rake
- Portable bund/berm materials or sandbags
- Hazardous waste drum (labelled) for used absorbents
- PPE (gloves, goggles)
- Fire extinguisher (appropriate rating)

(c) Drill rig spill kit (minimum)

- Pads – 50+
- Booms/socks – 4
- Granular absorbent – 10–20 kg
- Drip trays for leak points
- Waste drum for contaminated materials
- SDS folder for rig chemicals

6.5.9 Monitoring and inspection requirements

- Weekly spill kit inspections (and after any use).
- Daily drill rig leak checks and housekeeping.
- Monthly audit of hazardous substances register and storage compliance.
- Refuelling spot checks by ECO during high-intensity phases.

6.5.10 Monitoring table (6.5)

Measure / control	Monitoring indicator	Responsibility	Frequency	Evidence
Bunding/secondary containment in place	100% storage compliant; labels present	Site Supervisor; ECO	Weekly; monthly audit	Inspection logs; photos
SDS and inventory control	Register current; SDS available at point of use	HSE; Site Supervisor	Monthly	Register; SDS file
Refuelling procedure complied with	No refuelling outside designated points; checklists used	Site Supervisor; Contractor	Ongoing; spot checks weekly	Refuelling log; inspection notes
Drill rig leak control	Daily checks done; leaks repaired promptly	Drill contractor; HSE	Daily; weekly ECO verification	Daily rig checklist; CAPA
Spill kits complete and inspected	Kits complete; inspections current	HSE; Site Supervisor	Weekly; after use	Spill kit checklist
Spill response and remediation	All spills documented and closed out	ECO; Site Supervisor	As triggered; monthly review	Incident register; photos; disposal receipts

Objective: prevent hydrocarbon/chemical contamination and ensure rapid containment and remediation.

Controls: hazardous substances register and SDS; bunded storage (≥110% rule); segregation/labels; designated refuelling points with drip trays; drill contractor leak checks (stop-work for persistent leaks); tiered spill response (stop source, contain, protect receptors, recover, remove contaminated soil/absorbents, notify, document, dispose lawfully, ECO close-out, CAPA). Minimum spill kit specifications for vehicles, refuelling/camp points and drill rigs.

Monitoring: bunding/labels; SDS/register currency; refuelling compliance; leak check logs; spill kit inspections; spill close-out evidence.

6.6 Waste Management, Sanitation and Housekeeping

6.6.1 Objective and performance standard

The objective is to prevent pollution, nuisance conditions, wildlife attraction, and stakeholder complaints by ensuring that all wastes (general and hazardous) and all human sanitation requirements are managed in a controlled, hygienic, and auditable manner throughout exploration on **EPL9892**. This section is designed to meet ECC expectations by linking waste controls to evidence (manifests/receipts), routine checks, and clear responsibilities.

Performance standard (non-negotiables):

- **No dumping, burying, or burning** of waste anywhere within EPL9892.
- All waste is **segregated**, stored securely, and removed to authorised facilities.
- Sanitation is managed using closed systems (portable toilets or serviced ablutions); **no open defecation**.
- **No discharge** of greywater, sewage, oily water, or contaminated liquids to the environment (links to 6.4).
- Hazardous wastes are managed as per 6.5 and are never mixed with general waste.

6.6.2 Applicability

Applies to all personnel and contractors, including field crews, temporary camps, laydown areas, workshop/maintenance activities, and **RC/diamond drilling** sites.

6.6.3 Waste classification and segregation (source separation)

Waste must be separated at source into the following minimum streams:

(a) General (non-hazardous) wastes

- food waste (where applicable)
- mixed general waste (non-recyclable)
- recyclables (plastics, cans, paper/cardboard where feasible)
- scrap metal (non-contaminated)

(b) Hazardous wastes (must be handled under hazardous controls)

Examples include:

- waste oils, oily rags, oil filters
- used spill absorbents and contaminated soils (from 6.5)
- chemical containers (if not triple-rinsed and approved for disposal)
- batteries, spent fluorescent tubes, aerosols
- hydrocarbon-contaminated materials, oily water

Rule: If in doubt, treat as **hazardous** and consult the ECO/HSE.

6.6.4 Waste minimisation hierarchy

To reduce waste volumes and compliance burden:

- procure in bulk where feasible to reduce packaging;
- use refillable containers;
- return unused chemicals to suppliers where possible;
- avoid single-use items at camp where practicable;
- prioritise re-use (pallets, drums where safe and compliant).

6.6.5 Temporary waste storage standards (camp, laydown, drill sites)

(a) Location controls (link to 6.1 buffers and 6.4 water protection)

Waste storage areas must be:

- outside drainage buffers and waterpoint buffers (Section 6.1);
- on stable ground, not in flow paths or depressions;
- away from ignition sources for any hazardous materials.

(b) General waste storage requirements

- Use secure bins with lids (wind- and animal-proof).
- Bag waste daily where teams are active; do not allow litter accumulation.
- Provide clearly labelled receptacles at camps and staging areas.
- Store food waste in sealed containers to prevent scavengers.

(c) Hazardous waste storage requirements (interface to 6.5)

- Store hazardous waste in a designated, labelled area with:
    - bunded/contained floor (portable bund acceptable),
    - drums/containers clearly labelled by waste type,
    - lids closed at all times,
    - SDS and spill response instructions nearby,
    - spill kit immediately available.
- No mixing of incompatible hazardous wastes.
- Used spill absorbents and contaminated soils must be stored in sealed, labelled containers pending disposal.

(d) Drill site waste controls

- Drill pads must have:
    - designated waste container(s),
    - hazardous waste container for oily rags/filters/absorbents,
    - daily housekeeping checks,
    - no waste disposal pits.

6.6.6 Waste removal and lawful disposal (evidence-driven)

(a) General waste removal

- Waste is removed on a scheduled basis (frequency depends on activity intensity):
    - Low-intensity: at least weekly or at end of campaign;
    - High-intensity/drilling: minimum weekly, more frequently if volumes increase.
- Dispose only at authorised municipal or licensed waste facilities or approved contractors.

(b) Hazardous waste disposal

- Hazardous waste must be removed by authorised service providers and disposed at licensed facilities.
- Maintain an auditable trail: manifests, weighbridge slips, invoices, and disposal certificates where available.

(c) Evidence requirements (mandatory for ECC readiness)

For each disposal event, retain:

- date and waste type;
- estimated quantity/weight;
- transporter/service provider;
- destination facility;
- disposal receipt/manifests reference.

6.6.7 Sanitation and greywater management (strict controls)

(a) Sanitation standard

All exploration operations must provide compliant sanitation:

- **day-trip operations:** portable toilets or access to agreed facilities;
- **camps:** serviced portable toilets or managed ablution systems.

Absolute prohibition: open defecation and “cat holes.”

(b) Portable toilets / serviced systems (preferred)

- Use reputable service provider where feasible.
- Place toilets:
    - outside drainage and waterpoint buffers;
    - on stable ground;
    - away from heavy traffic zones to prevent tipping/vehicle strikes.
- Service at an interval matched to occupancy and climate (hot arid areas require higher service frequency to prevent odour/nuisance).
- Any leakage or overflow triggers immediate incident response and servicing (linked to Section 9).

(c) Greywater management (no uncontrolled discharge)

- Greywater includes dishwashing, shower, and wash water.
- Default requirement: **collect and remove** via service provider or dispose via controlled method authorised for the site conditions.
- If controlled soakaway is proposed (only if unavoidable):
    - must be outside drainage and waterpoint buffers;
    - must not be placed in permeable sands connected to groundwater;
    - must be designed to prevent ponding and mosquito breeding;
    - must be approved by ECO and captured as MoC.

(d) Hygiene and housekeeping

- Provide handwashing facilities or sanitiser at toilets and eating areas.
- Ensure food preparation areas are kept clean to avoid wildlife attraction and health risk.
- Daily housekeeping at camp and drill sites is mandatory.

6.6.8 Litter control, housekeeping and “leave-no-trace” rules

- Apply a “pack-in/pack-out” culture for field crews.
- Conduct a daily end-of-shift “litter sweep” at active work sites.
- Secure light materials against wind dispersal (bags, cardboard, plastics).
- Vehicles must carry small litter bags; no discarding from vehicles.

6.6.9 Non-compliance triggers and corrective action

- Any evidence of dumping/burning triggers major non-compliance and immediate corrective action, including clean-up, retraining, and contractor sanctioning.
- Persistent poor housekeeping at drill/camp areas triggers CAPA escalation (Section 8) and may trigger stop-work for hygiene risks.

6.6.10 Monitoring table (6.6)

Measure / control	Monitoring indicator	Responsibility	Frequency	Evidence
Waste segregation implemented	Bins labelled; hazardous separated	Site Supervisor; ECO	Weekly; daily during drilling	Photos; inspection logs
Secure temporary storage	No windblown litter; bins closed; hazardous bunded	Site Supervisor; HSE	Daily checks; weekly ECO verification	Daily log; ECO checklist
Disposal evidence maintained	100% disposal events have receipts/manifests	Site Supervisor; Proponent	Monthly audit	Waste dossier; receipts
Sanitation serviced and functional	No leakage/overflow; servicing on schedule	Site Supervisor; Contractor	Weekly (or as schedule); spot checks	Service logs; incident register
Greywater controlled	No discharge to environment	ECO; HSE	Weekly	Inspection records; MoC if used
Camp and drill housekeeping	Sites clean; no food waste exposure	Drill contractor; Site Supervisor	Daily; weekly ECO	Checklists; photos

Objective: prevent pollution, nuisance and wildlife attraction; ensure auditable disposal.

Non-negotiables: no dumping/burying/burning; segregation; secure storage; lawful disposal with receipts; no open defecation; no greywater/sewage discharge.

Controls: waste stream separation; hazardous waste stored sealed and labelled in bunded area; scheduled waste removal; portable toilets/ablutions serviced; greywater controlled; daily housekeeping and litter sweep; aligned templates for waste, hazardous waste, sanitation and housekeeping.

Monitoring: segregation; secure storage; disposal evidence completeness; sanitation service records; housekeeping compliance.

7. Monitoring Plan and Registers

A tiered monitoring system (daily, routine ECO, triggered) verifies implementation of critical controls, maintains a defensible evidence trail, and supports ECC compliance. Registers and templates are included in Annexure A, including route approvals, GPS logs, inspections, CAPA, incidents/spills, waste and sanitation, complaints and post-rain inspections.

7.1 Purpose and performance intent

This section establishes the monitoring system required to demonstrate effective implementation of the EMP for **EPL9892 (19,362 ha)** under Profile Energy (Pty) Ltd. The monitoring framework is designed to: (i) verify that mitigation measures are implemented and effective, (ii) identify non-compliances early and trigger corrective actions, (iii) maintain an auditable evidence trail suitable for ECC compliance inspections, and (iv) ensure that incidents, complaints, and changes in scope are managed systematically.

Performance intent: monitoring is routine, risk-based, documented, and backed by evidence (GPS datasets, photos, manifests/receipts, inspection checklists, and registers) that can be produced upon request.

7.2 Monitoring approach and inspection tiers

Monitoring is implemented through three tiers aligned to exploration intensity:

Tier 1 — Daily operational controls (line management)

Performed by Site Supervisor and Contractor Supervisors to confirm: route discipline, housekeeping, refuelling controls, waste segregation, sanitation functionality, and drill site checks (where applicable).

Tier 2 — Routine compliance inspections (ECO oversight)

Performed by ECO (with Site Supervisor) to verify compliance with:

- route approvals + GPS tracking + buffers (6.1),
- clearing limits and IAS controls (6.2),
- erosion/stormwater controls and post-rain stability (6.3),
- water protection and drilling cuttings/sumps controls (6.4),

- hazardous substances and spill readiness (6.5),
- waste management and sanitation controls (6.6).

Tier 3 — Triggered inspections (event-driven)

Performed after:

- rainfall events (erosion/crossings/rehab checks),
- spills/incidents,
- stakeholder complaints (dust/noise/access/waterpoints),
- scope changes (MoC triggers).

7.3 Monitoring frequency schedule (minimum requirements)

Frequencies are minimums and must increase during higher-intensity phases (especially drilling mobilisation and pad establishment).

7.3.1 Low-intensity phase (mapping/sampling/geophysics; day trips)

- Site Supervisor checks: **daily** when teams active
- ECO inspections: **bi-weekly** (or as per campaign plan)
- GPS route compliance review: **weekly**
- Post-rain inspections: **as triggered**

7.3.2 Moderate-intensity phase (multiple crews, staging area/camp, increased traffic)

- Site Supervisor checks: **daily**
- ECO inspections: **weekly**
- GPS route compliance review: **weekly**
- Waste/sanitation check: **weekly**
- Post-rain inspections: **as triggered (mandatory for crossings/steep segments)**

7.3.3 High-intensity phase (RC + diamond drilling; heavy vehicle mobilisation)

- Site Supervisor + drill supervisor checks: **daily** (including refuelling and rig leak checks)
- ECO inspections: **weekly minimum** (recommended **twice weekly** during mobilisation/initial pads)
- GPS route compliance review: **daily/weekly** (daily during mobilisation)
- Spill kit inspections: **weekly + after use**
- Post-rain inspections: **mandatory** for crossings, sloping tracks, pads, sumps, rehab sites

7.4 Roles and responsibilities for monitoring and recordkeeping

Proponent / Project Manager (Profile Energy):

- overall accountability for ensuring monitoring is resourced and implemented;
- reviews monthly performance; ensures CAPA closure and MoC decisions.

Site Supervisor / Exploration Manager:

- executes Tier 1 monitoring; maintains key registers; ensures corrective actions are completed;
- compiles weekly and monthly summaries; coordinates inspections and evidence capture.

ECO:

- executes Tier 2 compliance inspections and verifies evidence quality;
- issues corrective actions; verifies close-out; supports ECC reporting if required.

HSE Officer/Function:

- integrates environmental and safety incident reporting; confirms emergency readiness;
- supports training, driving rules, and contractor compliance.

Contractor Supervisors (incl. drill contractor):

- maintain daily checklists/logs under their scope; ensure spill readiness; implement housekeeping; execute rehab close-out for their disturbances.

7.5 Monitoring indicators (EMP "critical controls" dashboard)

To keep monitoring focused and defensible, the following are treated as **critical controls** with priority verification:

1. **Route approval + GPS compliance** (no track proliferation)
2. **Drainage/waterpoint buffers** respected
3. **Erosion initiation and post-rain stability** (crossings, steep segments, pads)
4. **Fuel/hazardous storage and refuelling discipline** + spill readiness
5. **Waste disposal evidence** (receipts/manifests) and zero dumping/burning
6. **Sanitation integrity** (no leaks; no open defecation)

7.6 Registers and templates (minimum set for ECC readiness)

7.6.1 Master register list (minimum)

The following registers must be implemented and maintained throughout operations:

1. Induction Register
2. Training & Toolbox Talk Register
3. ECO Inspection Register (Checklist + Findings + Actions)
4. Site Supervisor Daily Log / Pre-start Record
5. Route Approval Register (Route IDs + conditions)
6. GPS Track Log Register (vehicles + dates + file references)
7. Disturbance & Footprint Register (pads/spurs/trenches/camps/crossings)
8. Rehabilitation Close-out Register (before/after evidence)
9. Waste Register (general) + Disposal Receipts File

10. Hazardous Substances Register (inventory + SDS)
11. Hazardous Waste Log (waste oil, filters, oily rags, contaminated materials)
12. Refuelling Log / Refuelling Checklist (where bulk transfers occur)
13. Spill/Incident Register (environmental + integrated HSE)
14. Spill Kit Inspection Checklist
15. Sanitation & Greywater Service Log
16. Complaints/Grievance Register
17. Post-Rainfall Inspection Log
18. Chance-Find (Heritage) Register
19. IAS Register
20. Vehicle Roadworthiness Log (and speed compliance log if GPS supports)

8. Audits, Corrective Actions and Reporting

Audits and inspections feed into a CAPA system with defined severity classification, timeframes, root cause analysis, verification and escalation. Incident investigation and MoC escalation are mandatory for major/critical events and repeated failures. Contractor enforcement uses an escalation ladder (instruction → NCR/CAPA → stop-work → sanctions/removal). Reporting includes weekly compliance bulletins, monthly KPI dashboards and end-of-campaign close-out packs.

8.1 Purpose and performance intent

This section establishes the management loop that converts monitoring outputs (Section 7) into consistent compliance performance. It defines how **audits and inspections** identify issues, how **Corrective and Preventive Actions (CAPA)** are assigned and closed, how **incidents** are investigated to root cause, how **Management of Change (MoC)** is triggered for material scope changes or repeated failures, and how **contractor performance** is enforced to maintain ECC compliance.

Performance intent:

- Non-compliances are corrected quickly, verified with evidence, and prevented from recurring.
- Incidents are investigated to root cause with documented CAPA.
- Repeat issues trigger MoC and strengthened controls.
- Contractors are held accountable through audits, escalation, and contractual remedies.

8.2 Audit and inspection programme (types, scope, frequency)

8.2.1 Types of assurance activities

(a) Routine compliance inspections (operational assurance)

- Conducted by ECO and Site Supervisor in accordance with Section 7 frequencies.
- Focus: critical controls (routes/GPS/buffers, erosion, spill readiness, waste/sanitation, drilling cuttings/sumps controls).

(b) Internal EMP audits (system-level assurance)

- Formal review of the EMP management system: registers, evidence quality, CAPA, MoC, contractor records, and closure packs.

(c) Contractor compliance audits (performance assurance)

- Targeted audits of drill contractor and service providers (waste, sanitation, fuel handling), especially during RC/diamond drilling phases.

8.2.2 Minimum frequencies (risk-based)

- **Routine ECO inspections:** as per Section 7 (weekly minimum during drilling).
- **Internal EMP audit:** at least **quarterly during active exploration** or **per campaign** (mobilisation/mid-campaign/demobilisation) where activities are episodic.
- **Drill contractor audit:** at least **monthly during active drilling**, and additionally during mobilisation and initial pad establishment.
- **Triggered audits:** after major incidents, repeated non-compliances, or significant stakeholder grievances.

8.2.3 Audit scope (minimum checklist)

Audits must review and verify:

- document control: latest EMP, route approvals, MoC records;
- register completeness and evidence quality (photos, GPS, receipts);
- route discipline (GPS deviations and closure);
- buffer compliance (drainages and waterpoints);
- erosion control effectiveness and post-rain repairs;
- hazardous storage/refuelling compliance and spill readiness;
- waste segregation, hazardous waste handling, and disposal evidence;
- sanitation servicing logs and leak response;
- rehabilitation close-out criteria and closure pack integrity;
- grievances/complaints management and response times.

8.3 Non-compliance classification and escalation rules

To standardise response and ensure proportionality, findings are classified as:

8.3.1 Minor non-compliance

Low risk, localised, easily correctable, no material environmental harm.
Examples: bin lid missing, label missing, minor housekeeping lapse, incomplete checklist.
Response: correct within a short timeframe (typically 24–72 hours), record close-out evidence.

8.3.2 Major non-compliance

Significant risk and/or breach of a critical control; may cause harm or create high likelihood of harm; includes repeat minors.
Examples: unauthorised route spur, refuelling outside designated area, storage without bunding, sanitation failure not addressed promptly, erosion features on track approaches to crossings.
Response: immediate corrective action; CAPA with due dates; increased inspection frequency; retraining; contractor escalation if applicable.

8.3.3 Critical non-compliance / Incident

Actual environmental harm, credible threat of serious harm, repeated major issues, or any event with strong reputational/ECC consequence.
Examples: spill with pathway to drainage/waterpoint, uncontrolled discharge, deliberate dumping/burning, suspected heritage disturbance, uncontrolled fire.
Response: stop-work where required; emergency response (Section 9); incident investigation; authority/landowner notification as required; MoC review; management intervention and potential contractor suspension.

8.4 Corrective and Preventive Action (CAPA) system

8.4.1 CAPA principles

CAPA applies to:

- inspection findings, audit findings, incidents, post-rain failures, and complaints. Each CAPA must be: **specific, time-bound, assigned, verified, and evidenced.**

8.4.2 CAPA workflow (mandatory steps)

1. **Record the issue**
    - Log in CAPA Register (or embedded in inspection/incident register with unique CAPA ID).
2. **Contain and correct immediately** (where required)
    - e.g., stop refuelling; close unauthorised spur; clean litter; install water bar.
3. **Assign responsibility and due date**
    - Named individual/contractor supervisor; realistic but firm deadline.
4. **Root-cause analysis** (mandatory for major/critical, or repeated minors)
    - Identify underlying causes: training gaps, unclear approvals, poor supervision, equipment failure, incentive misalignment.
5. **Preventive actions**
    - e.g., revise route approval protocol, add demarcation, adjust inspection frequency, strengthen checklists, retrain drivers, change equipment.
6. **Verification and close-out**
    - ECO/Site Supervisor verifies completion using evidence (photos, GPS, receipts).
7. **Escalation if overdue or repeated**
    - Management review; contractor sanctions; MoC trigger where systemic.

8.4.3 CAPA timeframes (default expectations)

- **Minor:** close within **3 working days** (or sooner where easy).
- **Major:** immediate containment + close within **7–14 days** depending on logistics, with interim controls documented.
- **Critical:** immediate stop-work/containment; close-out timeframe defined by IC/ECO; authority notification where required.

8.5 Incident management and investigation

8.5.1 What counts as an incident (minimum)

Incidents include (but are not limited to):

- hydrocarbon/chemical spills;
- sewage/greywater release;
- erosion failures with sediment movement toward drainages;
- uncontrolled fire or smoke incident;
- heritage chance finds (and any disturbance risk);
- vehicle collisions/rollovers with environmental pathway (leakage) or stakeholder impact;
- any event that triggers a complaint or threatens compliance with critical controls.

8.5.2 Incident response integration

Immediate response follows Section 9 principles: **protect life → prevent escalation → protect environment → recover/remediate → document → investigate**.
All incidents must be recorded in the Incident Register (Section 7 template) and linked to CAPA.

8.5.3 Investigation requirements (major/critical incidents)

For major/critical incidents:

- initiate investigation within **24–72 hours** (as access allows);
- document sequence of events, conditions, involved personnel, and contributing factors;
- determine whether notifications are required (ECC conditions/landowner);
- define remediation actions and preventive measures;
- verify remediation close-out with ECO sign-off;
- include disposal receipts for contaminated materials where relevant.

8.5.4 Root-cause tools (fit-for-purpose)

Use practical methods such as:

- "5 Whys" analysis for recurring operational failures;
- barrier analysis (what barrier failed: route approvals, bunding, training, supervision, maintenance);
- contributing factor matrix (human/equipment/environment/procedure).

8.6 Management of Change (MoC) escalation (systemic control)

8.6.1 MoC triggers (mandatory)

MoC must be initiated when:

- exploration scope escalates materially (e.g., increased drill density, new camps, new water abstraction, new access corridors);
- new sensitive receptors are identified (waterpoints, significant drainages, heritage features);
- repeated failures indicate controls are ineffective (e.g., repeated route deviations, recurring erosion at crossings, repeated spills);
- a significant stakeholder grievance indicates access or nuisance risk is increasing;
- ECC conditions or legal requirements change, or new permit requirements arise.

8.6.2 MoC process (minimum steps)

1. Describe change and reason (what, where, why).
2. Screen risks (environmental + HSE + stakeholder).
3. Identify additional controls/mitigation and monitoring upgrades.
4. Determine whether additional approvals are needed (ECC amendment, permits, landowner consent).
5. Update method statements, maps, route approvals, and registers.
6. Communicate changes (toolbox talks, updated GPS routes, contractor briefings).
7. Implement and verify effectiveness (targeted inspections/audit).

8. Record MoC close-out with evidence.

8.6.3 MoC record (Template fields)

- MoC ID
- Change description and location
- Drivers (operational need, safety, stakeholder request)
- Risk review summary
- Controls updated/added
- Approvals required and obtained
- Communication actions completed
- Verification plan and results
- Close-out date and sign-off

8.7 Contractor performance management and enforcement

8.7.1 Contractor EMP obligations

All contracts must bind contractors to:

- comply with route approvals and buffers;
- maintain spill readiness and housekeeping;
- segregate waste and provide disposal evidence;
- conduct daily checklists for rigs/plant;
- implement rehabilitation close-out before demobilisation;
- participate in audits and close CAPAs on time.

8.7.2 Contractor non-compliance escalation ladder

1. **Verbal instruction + immediate correction** (minor, first occurrence).

2. **Written non-conformance + CAPA** with deadline (major/repeat minor).
3. **Increased oversight** (more frequent inspections, mandatory toolbox talks).
4. **Stop-work** for critical risks or repeated major issues.
5. **Contractual sanctions** (penalties, withholding payments linked to CAPA close-out, demobilisation at contractor cost).
6. **Removal/replacement** for systemic non-compliance.

8.7.3 Contractor KPI review (monthly during drilling)

Review contractor performance using:

- number of non-compliances by severity;
- CAPA closure rate and overdue items;
- spills and leak frequency;
- housekeeping scores;
- rehabilitation close-out compliance.

8.8 Reporting (internal, external readiness) and record retention

8.8.1 Internal reporting outputs

- **Weekly compliance bulletin:** key findings, incidents, CAPA status, rehab progress, upcoming risk periods (winds/rains).
- **Monthly management report:** KPI dashboard, trends, MoC updates, contractor performance, grievances summary, and recommendations for control strengthening.
- **End-of-campaign close-out report:** final footprint and rehab evidence pack, waste disposal dossier, incident summary, CAPA closure evidence.

8.8.2 External reporting readiness (ECC and stakeholders)

Maintain readiness to provide (on request or per ECC conditions):

- compliance summaries;
- incident reports and remediation evidence;
- waste manifests/receipts;
- rehabilitation/closure packs;
- MoC records;
- grievance register and resolution records.

8.8.3 Record retention and audit trail

All registers, photos, GPS datasets, manifests, MoC records, and audit reports must be retained in a controlled project file system for the life of the ECC and a reasonable period thereafter. Controlled access and backups are required to prevent loss of compliance evidence.

8.9 Embedded mini monitoring table (Section 8 implementation controls)

System element	Monitoring indicator	Responsibility	Frequency	Evidence
Internal audits completed	Audits conducted per schedule	Proponent; ECO	Quarterly / per campaign	Audit reports; action lists
CAPA closure performance	% CAPAs closed on time; overdue count	Site Supervisor; ECO	Weekly review; monthly KPI	CAPA register
Incident investigation quality	Root cause + preventive actions documented	ECO; HSE	As triggered	Investigation reports; CAPA links
MoC triggered appropriately	All material scope changes recorded	Proponent; Site Supervisor	As triggered; monthly review	MoC register
Contractor enforcement effective	Repeat major issues reduced over time	Proponent; ECO	Monthly during drilling	Contractor KPI reviews; sanctions records

9. Emergency Preparedness and Response

An integrated EPRP covers spills, sanitation failures, erosion/runoff failures, fire, vehicle incidents, medical emergencies, severe weather and security incidents. It defines incident command roles, emergency communications, equipment readiness, scenario procedures, training/drills, and documentation requirements. All emergencies are logged and linked to CAPA close-out.

9.1 Purpose and performance intent

This section establishes an integrated **Emergency Preparedness and Response Plan (EPRP)** for exploration activities on EPL9892, covering both environmental emergencies (spills, sanitation failures, erosion/runoff events, fire, heritage chance finds) and HSE emergencies (vehicle incidents, medical events, severe weather, security incidents). The intent is to ensure emergencies are prevented where practicable, managed quickly and safely when they occur, and documented to demonstrate due diligence, ECC compliance, and effective corrective actions.

Performance intent:

- Clear command structure, stop-work authority, and escalation pathways.
- Emergency equipment is available, inspected, and fit for purpose.
- Personnel are trained and drills are conducted.
- Incidents are documented, investigated, and closed out with CAPA (Section 8).

9.2 Credible emergency scenarios (minimum set)

Given the arid, windy southern Namibia setting and inclusion of RC/diamond drilling, the following scenarios are considered credible:

Environmental emergencies

- **Fuel/chemical spill** (vehicle, refuelling point, drill rig) with potential pathway to drainage lines or waterpoints (links to 6.1, 6.4, 6.5).
- **Sewage/greywater release** from toilets/ablutions or camp systems (link to 6.6).
- **Erosion/stormwater failure** after episodic rainfall (track rutting, crossing failure, pad runoff) (link to 6.3, 6.4).

- **Wildfire** caused by camp activity, vehicles, generators, or electrical faults.
- **Heritage chance find disturbance risk** during trenching/pad prep (interface to future 6.10).

HSE emergencies

- Vehicle collision/rollover (including livestock/wildlife collisions) with leakage risk.
- Medical emergency: heat stress/dehydration, injury, snakebite, etc.
- Fire/explosion at fuel storage or refuelling areas.
- Severe weather: high winds/dust storms, intense rainfall causing washouts.
- Security incident: theft, conflict, unauthorised access.

9.3 Emergency organisation and roles (incident command structure)

Emergency response uses a fit-for-purpose structure:

- **Incident Controller (IC):** Site Supervisor (or most senior competent person present)
    - initiates stop-work, coordinates response, and ensures reporting.
- **Environmental Lead:** ECO
    - directs environmental containment, remediation verification, evidence capture, and advises on notifications.
- **HSE Lead / First Aider:** HSE Officer or designated First Aid Officer
    - manages medical response, responder safety, and coordination with emergency services.
- **Spill Response Team:** trained personnel nominated per crew/rig
    - deploys spill containment and recovery equipment.
- **Contractor Supervisors (incl. drill contractor):**
    - execute response actions within their work areas and provide equipment/personnel.

Stop-work authority: Any employee or contractor may stop work where imminent danger to people or risk of serious environmental harm exists; the IC must be notified immediately.

9.4 Emergency communications and escalation

9.4.1 Emergency contact sheet (controlled document)

Maintain a current Emergency Contact Sheet accessible at camp and in vehicles. It must include:

- Site Supervisor / IC
- ECO
- HSE Lead / First Aid Officer
- Drill contractor supervisor
- Nearest clinic/hospital and emergency services
- Police
- Landowners/occupiers and key access contacts
- Waste/sanitation service providers (where relevant)

Review at mobilisation and update whenever personnel change.

9.4.2 Notification rules (internal/external)

- **Internal:** all incidents reported immediately to IC + ECO + HSE.
- **Landowner notification:** any incident affecting access, fences, livestock, waterpoints, dust nuisance escalation, fire risk, or reputational impact.
- **Authority notification:** as required by ECC conditions and severity, especially for major spills, pollution events, fires, or heritage-related matters.

All notifications must be logged (time, person contacted, summary, outcomes).

9.5 Emergency equipment and readiness (minimum requirements)

9.5.1 Mandatory equipment (minimum)

- Spill kits per Section 6.5 (vehicle kits, refuelling/camp kits, drill rig kits).
- Fire extinguishers at refuelling points, fuel storage, generators, and where required in vehicles/rigs.

- First aid kits in vehicles and at camp; at least one trained first aider per active team/rig.
- Communications equipment (mobile phones/radios) and backup power/charging.
- Basic tools for erosion response: shovels, sandbags/berm material, brush packing capability.
- PPE appropriate to spill/fire response (gloves, goggles, and where applicable masks/respiratory protection for dusty conditions).

9.5.2 Readiness checks

- Spill kit inspections weekly and after use (Section 7 register).
- Fire extinguisher checks monthly and per service schedule.
- First aid kit checks monthly and after use.
- Drill rig daily leak/housekeeping checks (during drilling).

9.6 Emergency response procedures (step-by-step)

9.6.1 General emergency response sequence

1. **Stop work** and secure the area (control access, establish perimeter).
2. **Protect life** (first aid/evacuation as required).
3. **Prevent escalation** (stop source, isolate equipment, remove ignition sources).
4. **Protect the environment** (contain spill/runoff; protect drainages/waterpoints).
5. **Recover/remediate** (remove contaminated materials, stabilise erosion).
6. **Document** (GPS, photos, volumes/extent, actions taken, wastes generated).
7. **Report and investigate** (Incident Register + CAPA + root cause per Section 8).
8. **Verify close-out** (ECO sign-off; disposal receipts/manifests filed).

9.6.2 Spill response (aligned to 6.5, reiterated for field use)

Immediate actions (all spills):

- stop source; isolate ignition; contain downslope; protect drainages; recover; remove contaminated soil/absorbents; store as hazardous waste; document; notify.

Special rule (pathway to drainage/waterpoint):
Any spill with likely migration toward a drainage line or waterpoint triggers **stop-work**, rapid berming/booming, escalation, and post-rain follow-up inspection.

9.6.3 Sanitation/greywater failure response (aligned to 6.6)

- isolate area; prevent spread; arrange urgent servicing; remove contaminated materials; disinfect where appropriate; record incident and implement CAPA (siting/service frequency/contractor performance).

9.6.4 Erosion/runoff failure response (aligned to 6.3 and 6.4)

- stop traffic causing damage; install immediate controls (water bars, rock checks, brush packing); stabilise crossing approaches; repair rills; conduct follow-up after next rainfall; trigger MoC if repeated.

9.6.5 Fire response

- raise alarm; stop work; evacuate as required; isolate fuel sources if safe; use extinguishers for small controllable fires only if trained; notify landowner and emergency services as needed; record and rehabilitate burnt areas where erosion risk is elevated.

9.6.6 Vehicle accident/rollover response

- secure scene; provide first aid; prevent secondary incidents; contain any leaks as spill; notify stakeholders if access/roads affected; investigate and implement CAPA (speed, fatigue, route conditions).

9.7 Training, drills and competency

- Conduct at least **one emergency drill per campaign**, rotating scenarios (spill at refuelling, rig leak, fire, medical evacuation).
- Conduct toolbox talks on emergency communications, spill steps, fire safety, and post-rain erosion risks.
- Record drill outcomes and corrective actions; integrate into CAPA system.

9.8 Emergency documentation and reporting requirements

For each emergency incident, minimum documentation includes:

- incident report and register entry;
- GPS location and photos;
- description of response steps and materials used;
- hazardous waste generated and disposal evidence;
- notifications made;
- CAPA actions, due dates and close-out sign-off.

9.9 Monitoring table (Section 9 readiness and performance)

Commitment	Indicator	Responsibility	Frequency	Evidence
Emergency equipment ready	Kits complete; inspections current	HSE; Site Supervisor	Weekly spill kits; monthly others	Checklists; photos
Contacts current	Contact sheet updated	Site Supervisor	Mobilisation; monthly	Controlled contact sheet
Drills conducted	Drill completed; improvements tracked	HSE; ECO	Per campaign	Drill records; CAPA
Incident response effective	Time to contain; recurrence rate	ECO; HSE	As triggered; monthly	Incident register; CAPA
Post-event learning applied	Preventive actions implemented	Proponent; Site Supervisor	Monthly	CAPA closure evidence

10. Final Closure and Post-Closure Commitments

Closure is evidence-based and includes demobilisation, drill pad/sump/cuttings stabilisation, spur closure, waste removal with receipts, and stakeholder closure engagement. Closure criteria require stability, no contamination, no waste, effective access control, and verified evidence. Post-closure monitoring includes post-rain checks and rectification commitments.

10.1 Purpose and closure principle

This section defines the closure approach for exploration on EPL9892 to ensure that all disturbances are rehabilitated, wastes removed, hazards eliminated, and land use functionality restored to a stable condition compatible with prevailing land uses (primarily extensive farming and associated access systems). The closure approach is based on **progressive rehabilitation** and **evidence-based close-out**.

Closure principle: return disturbed areas to a stable, non-polluting, non-eroding condition, with no ongoing contamination risk and no legacy access spurs that promote cumulative disturbance.

10.2 Applicability and closure triggers

Closure actions apply when:

- a campaign ends and demobilisation occurs;
- drilling is completed at a target and pads/spurs are no longer needed;
- the project is suspended for an extended period;
- ECC validity ends or is not renewed;
- the proponent exits the EPL or transfers operational control (handover requirements apply).

10.3 Decommissioning and demobilisation requirements (minimum)

10.3.1 Removal of infrastructure and materials

- Remove all temporary camp structures, laydown materials, signage (unless agreed), and storage units.

- Remove all fuel storage systems, drums, chemicals, and hazardous materials.
- Remove all wastes (general and hazardous) with disposal evidence.

10.3.2 Drill site closure (RC + diamond specific)

- Drill pads: re-contour compacted areas where necessary; remove any artificial berming that channels runoff unless designed as erosion control; stabilise pad edges.
- Sumps (if used): drain and manage residues appropriately; backfill; re-contour; stabilise; confirm no overtopping risk.
- Cuttings: stabilise and re-contour cuttings piles; prevent windblown dispersion and runoff mobilisation; keep out of drainages.
- Ensure drill holes are left safe and in accordance with good practice and any applicable licence/landowner conditions (plugging/capping where required).

10.3.3 Track and spur closure (critical legacy control)

- Close and rehabilitate all temporary access spurs and any unauthorised tracks created (if any):
    - ripping/scarifying; re-contouring; water bars; brush packing; rock barriers; blocking entry points to prevent re-use.
- Track braiding must be consolidated and rehabilitated; do not leave multiple parallel tracks.

10.3.4 Waste and sanitation close-out

- Remove portable toilets and ensure final service/pump-out complete.
- Remove and dispose of all hazardous wastes (used absorbents, contaminated soils, oils, filters, batteries) with manifests/receipts.
- Conduct a final “litter sweep” of all sites (pads, camps, laydowns, crossings).

10.4 Closure criteria (completion standards)

Final closure is achieved only when all disturbed sites meet these criteria:

1. **Stability:** no active erosion (no rills/gullies/sediment fans), and runoff disperses naturally.

2. **No contamination:** no hydrocarbon staining/odour; spill sites remediated; contaminated soils removed and lawfully disposed.
3. **No waste:** all general and hazardous wastes removed; receipts/manifests filed.
4. **Access control:** temporary spurs are effectively closed and not readily re-used.
5. **Evidence:** each disturbance has GPS coordinates, before/after photos, and ECO verification.
6. **Stakeholder interface:** landowner/occupier concerns addressed and closure communications documented.

10.5 Closure verification, sign-off and reporting (evidence pack)

10.5.1 Closure pack compilation (Site Supervisor responsibility)

The Site Supervisor compiles a **Closure Pack** including:

- final Disturbance & Footprint Register (all sites closed)
- Rehabilitation Close-out forms for each site
- before/after photo set and GPS dataset
- waste disposal dossier (general + hazardous manifests/receipts)
- incident and CAPA close-out summary
- stakeholder communications/complaints close-out status
- MoC records relevant to closure decisions

10.5.2 ECO closure inspection and sign-off

The ECO conducts a closure inspection to verify:

- closure criteria met;
- spurs blocked and stabilised;
- erosion controls effective;

- no residual pollution risk.
  ECO issues sign-off or identifies residual actions with deadlines (CAPA-linked).

10.5.3 Stakeholder closure engagement

- Provide landowners/occupiers notice of demobilisation and closure activities.
- Offer a joint walkover (where feasible) to verify closure outcomes (gates/fences/waterpoints/access).
- Record outcomes and any agreed residual tasks.

10.5.4 Authority reporting readiness

Where ECC conditions require submission of closure evidence or a close-out report, provide the Closure Pack or a summarised version with attachments. Even where not explicitly required, maintain readiness to produce evidence on request.

10.6 Post-closure monitoring and commitments (risk-based)

Because erosion and rehabilitation failures often emerge after rainfall, the following commitments apply:

- **Post-rain verification:** inspect priority rehab sites after the first significant rainfall event following closure (crossings, steep track segments, pads, sumps and cuttings areas).
- **Rectification commitment:** if erosion or instability is identified and attributable to project disturbance, implement repairs promptly and document close-out.
- **IAS surveillance:** check for invasive establishment along disturbed corridors after rains; treat early where observed (aligns with 6.2).
- **Residual spill site monitoring:** any significant spill site must be re-checked after rainfall for evidence of migration or renewed staining.

10.7 Handover and continuity (if EPL control changes)

If exploration responsibility changes hands:

- transfer the EMP, route maps, registers, disturbance and rehab evidence, CAPA/MoC records, and closure packs;
- clearly document any residual obligations and open CAPAs;
- maintain record retention per Section 8.

10.8 Monitoring table (Section 10 closure performance)

Commitment	Indicator	Responsibility	Frequency	Evidence
Closure pack complete	100% disturbances closed with evidence	Site Supervisor; ECO	At demobilisation	Closure pack; GPS/photos
Waste removal verified	Receipts/manifests complete	Site Supervisor	At closure; monthly audit	Waste dossier
Spurs closed effectively	Entry blocked; no re-use observed	ECO	At closure; post-rain	Photos; post-rain log
Rehab stability confirmed	No active erosion/pooling	ECO; Site Supervisor	Post-rainfall	Post-rain log; CAPA
Residual issues closed	All closure CAPAs closed	Proponent; ECO	Within deadlines	CAPA register

Annexures

Implementation-ready templates and controlled forms for monitoring, auditing, incident response and closure.

Annexure A: Registers and Templates

A1 Induction Register

Date	Name	Role/Company	Induction Delivered By	Topics Covered	Signature

A2 Training & Toolbox Talk Register

Date	Type	Topic	Facilitator	Attendees	Evidence

A3 Route Approval Register

Route ID	Class	Purpose	Approval Date	Conditions	GPX/KML Ref	Status

A4 GPS Track Log Register

Date	Vehicle ID	Driver	GPX File Ref	Approved Route IDs	Deviation (Y/N)	CAPA/Incident Ref

A5 Disturbance & Footprint Register

Disturbance ID	Type	Date Opened	GPS Ref	Area/Length	Route ID	Buffers Confirmed	Status

A6 Rehabilitation Close-out Form

Site ID	Close-out Date	Works Completed	GPS/Photo Refs	Post-rain Follow-up	ECO Verification	Sign-off

A7 ECO Compliance Inspection Log

Date	Areas Inspected	Findings	Severity	Actions Required	Responsible	Due Date	Close-out Evidence

A8 CAPA Register

CAPA ID	Date	Source	Issue	Severity	Corrective Action	Preventive Action	Responsible	Due Date	Status/Close-out

A9 Spill/Incident Register

Incident ID	Date/Time	GPS	Type	Volume/Extent	Immediate Actions	Waste Generated	Disposal Ref	CAPA Ref	Close-out

A10 Spill Kit Inspection Checklist

Location	Date	Pads	Booms/Socks	Granules	PPE	Bags	Shovel	Replacements	Inspector

A11 Hazardous Substances Register

Product	Use	Qty	Storage Location	Bunded	SDS Available	PPE/Controls	Notes

A12 Hazardous Waste Log

Date	Waste Type	Source Activity	Container ID	Qty	Bunded Storage	Removal Date	Receipt Ref	ECO Verified

A13 Waste Register & Disposal

Date	Waste Stream	Qty	Storage Location	Collected By	Destination Facility	Receipt Ref	Notes

A14 Sanitation & Greywater Service Log

Date	Facility Type	Location	Condition	Service Performed	Provider	Next Due	Incident Ref	Actions

A15 Complaints/Grievance Register

Complaint ID	Date	Complainant	Category	Description	Actions Taken	Feedback Date	Close-out Date	Notes

A16 Post-Rainfall Inspection Log

Rainfall Date/Notes	Inspector	Locations Checked	Findings	Repairs Completed	Follow-up Required	Photo/GPS Refs

A17 IAS Register

Date	GPS	Species/Description	Extent	Action Taken	Follow-up Date	Evidence

A18 Vehicle Roadworthiness/Pre-start

Date	Vehicle ID	Key Checks	Spill Kit	First Aid	Defects/Actions	Driver Signature

Annexure B: Inspection Checklists

B1 Site Supervisor Daily Checklist

☐ Approved routes and daily destinations confirmed; no off-route driving (6.1).

☐ GPS tracking enabled on all vehicles; GPX files saved (6.1).

☐ Drainage/waterpoint buffers understood for the day (6.1/6.4).

☐ Designated refuelling points confirmed; drip trays and spill kits available (6.5).

☐ Waste bins present/secure; no litter; hazardous waste segregated (6.6).

☐ Sanitation functional; service due dates checked (6.6).

☐ Drill checks (if applicable): leak check and housekeeping completed (6.4/6.5/6.6).

☐ Any incidents/near misses recorded and escalated (7–9).

B2 ECO Weekly Critical Controls Checklist

☐ Route approvals in place for Class C spurs; widths respected; no braiding.

☐ GPS logs reviewed; deviations investigated; CAPA raised.

☐ Drainage/waterpoint buffers respected; crossings stable; post-rain checks completed.

☐ Erosion controls present; no rilling/gullying; repairs documented.

☐ Fuel/hazardous storage bunded and labelled; SDS available; spill kits complete.

☐ Refuelling only at designated points; no staining observed.

☐ Waste segregation and storage compliant; disposal evidence current.

☐ Sanitation serviced; no leaks/overflows; greywater controlled.

☐ Rehabilitation close-outs evidence-based; spurs effectively blocked and stabilised.

☐ Registers complete and current.

Annexure C: Emergency Contacts Sheet

Populate and keep current. Place in camp and each active vehicle.

Role / Service	Name	Contact Details
Incident Controller (Site Supervisor)	[Insert]	[Insert]
Environmental Control Officer (ECO)	[Insert]	[Insert]
HSE Lead / First Aid Officer	[Insert]	[Insert]
Drill Contractor Supervisor	[Insert]	[Insert]
Nearest Clinic/Hospital	[Insert]	[Insert]
Ambulance / Emergency Services	[Insert]	[Insert]
Police	[Insert]	[Insert]
Landowner / Occupier Contact	[Insert]	[Insert]
Fire Services (if applicable)	[Insert]	[Insert]

Annexure D: Training Matrix

Role	Induction	Spill Response	First Aid	Driver Safety	Registers & Evidence	Heritage Awareness
Site Supervisor	Y	Y	Y	Y	Y	Y
ECO	Y	Y	N/A	N/A	Y	Y
HSE	Y	Y	Y	Y	Y	Y
Drivers	Y	Y (basic)	N/A	Y	N/A	Y (basic)
Field Technicians	Y	Y (basic)	N/A	N/A	N/A	Y (basic)
Drill Supervisor	Y	Y	Y	Y	Y	Y
Drill Crew	Y	Y	N/A	N/A	N/A	Y (basic)

D2 Competency Record (per person)

Name	Role	Training Type	Date Completed	Trainer	Next Due/Notes

Annexure E: Closure Pack Checklist

☐ Final Disturbance & Footprint Register (all sites closed).

☐ Rehabilitation Close-out Forms for each disturbance (with ECO sign-off).

☐ Before/after photo set linked to site IDs and dates.

☐ GPS dataset of routes used, disturbances and closed spurs.

☐ Waste disposal dossier (general + hazardous) with receipts/manifests.

☐ Incident/spill close-out evidence (remediation + disposal).

☐ CAPA register showing closure of all open actions.

☐ Post-rain inspection records and repairs close-out (where triggered).

☐ Stakeholder communications/complaints register close-out notes.

☐ MoC records relevant to closures and residual obligations.

☐ Drill-specific close-out: pad re-contouring, sump closure, cuttings stabilisation, hole safety (as applicable).

ECO Final Closure Verification: ☐ Completed Date: _____ ECO Name/Signature: _____

Proponent Representative Sign-off: ☐ Completed Date: _____ Name/Signature: _____