ENVIRONMENTAL MANAGEMENT PLAN (EMP)

Proposed Small-Scale Gold (Au) Mining Operation

Kunene Region, Namibia

Prepared For

Okondjamo Mining Investments cc

Prepared By

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EXECUTIVE SUMMARY

This Environmental Management Plan (EMP) has been prepared for the proposed small-scale gold (Au) mining operation situated within the Kunene Region of north-western Namibia. The EMP establishes the operational environmental-management framework through which all construction, mining, processing, waste-management, rehabilitation and closure activities associated with the proposed operation shall be managed throughout the life of mine.

The EMP has been developed in accordance with the Environmental Management Act, 2007 (Act No. 7 of 2007), the Environmental Impact Assessment Regulations, 2012, and applicable Namibian mining and environmental legislation. The document further incorporates internationally recognized environmental-management principles, including pollution prevention, groundwater protection, adaptive environmental management, progressive rehabilitation and continuous environmental improvement.

The proposed project involves small-scale hard-rock gold mining and associated operational activities, including:

- Site establishment and access development;
- Ore extraction and hauling;
- Crushing and screening activities;
- Gravity-assisted mineral processing;
- Limited controlled chemical-assisted processing where operationally required;
- Waste-rock and dry-stack residue management;
- Hazardous-material handling and storage;
- Rehabilitation and closure activities.

Groundwater protection remains the highest environmental-management priority associated with the proposed operation due to the semi-arid environmental conditions and regional dependence on groundwater resources. Accordingly, the EMP places strong emphasis on:

- Spill prevention and spill-response systems;
- Hazardous-material management;
- Groundwater monitoring;
- Controlled residue management;
- Stormwater and erosion management;
- Progressive rehabilitation;
- Environmental monitoring and compliance auditing.

The EMP establishes:

- Environmental mitigation measures;
- Monitoring schedules;
- Environmental inspection procedures;
- Incident reporting systems;

- Emergency-response procedures;
- Rehabilitation and closure commitments;
- Environmental performance indicators and compliance mechanisms.

Provided that all mitigation measures, monitoring systems and operational controls established within this EMP are fully implemented, the proposed operation is expected to remain operationally manageable and environmentally controllable within the receiving environment of the Kunene Region.

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1. INTRODUCTION

1.1 Background

This Environmental Management Plan (EMP) has been prepared for the proposed small-scale gold (Au) mining operation located within the Kunene Region of north-western Namibia.

The EMP has been developed as a standalone operational environmental-management document intended to guide the implementation of environmental controls, mitigation measures, monitoring systems and compliance procedures associated with the proposed mining operation throughout the life of mine.

The EMP serves as the primary environmental implementation document applicable to:

- Site establishment;
- Construction activities;
- Mining operations;
- Ore-processing activities;
- Hazardous-material handling;
- Waste-management activities;
- Rehabilitation activities;
- Closure and post-closure phases.

This EMP has specifically been designed to:

- Translate environmental assessment findings into operational management actions;
- Establish clear environmental responsibilities and procedures;
- Provide operational environmental-control systems;
- Support environmental compliance and accountability;
- Protect groundwater resources and surrounding environmental receptors.

The receiving environment within the Kunene Region is environmentally sensitive due to:

- Semi-arid climatic conditions;
- Low groundwater recharge potential;
- Dependence on groundwater resources;
- Slow ecological recovery rates;
- Sensitivity to surface disturbance and erosion.

The EMP therefore places significant emphasis on:

- Groundwater protection;
- Spill prevention and spill-response capability;
- Controlled hazardous-material management;
- Dust and erosion management;

- Progressive rehabilitation and closure planning.

1.2 Purpose of the EMP

The purpose of this EMP is to establish the operational environmental-management framework through which environmental impacts and operational risks associated with the proposed mining operation shall be:

- Prevented where feasible;
- Minimized where unavoidable;
- Monitored continuously;
- Managed adaptively throughout the life of mine.

The EMP further aims to:

- Ensure compliance with applicable environmental legislation and permit conditions;
- Support environmentally responsible operational practices;
- Establish monitoring and reporting obligations;
- Define environmental responsibilities and accountability;
- Support environmental auditing and compliance verification.

1.3 Scope of the EMP

This EMP applies to all project-related activities associated with the proposed small-scale gold mining operation, including:

- Site preparation and construction;
- Mining and ore extraction;
- Crushing and processing activities;
- Fuel and hazardous-material handling;
- Waste and residue management;
- Water management;
- Stormwater control;
- Rehabilitation and closure.

The EMP applies to:

- Site management;
- Employees;
- Contractors;
- Sub-contractors;
- Service providers;
- Any personnel associated with operational activities.

1.4 Legislative and Regulatory Framework

This EMP has been prepared with reference to:

- Environmental Management Act, 2007 (Act No. 7 of 2007);
- Environmental Impact Assessment Regulations, 2012;
- Minerals (Prospecting and Mining) Act, 1992 (Act No. 33 of 1992);
- Applicable water-resource legislation;
- Occupational health and safety requirements;
- Environmental Clearance Certificate conditions where applicable.

The EMP further incorporates:

- Pollution-prevention principles;
- Groundwater-protection principles;
- Hazardous-material management standards;
- Progressive rehabilitation principles;
- Adaptive environmental-management principles.

2. PROJECT DESCRIPTION

2.1 Overview of the Proposed Operation

The proposed project involves small-scale hard-rock gold mining and associated processing activities within the Kunene Region.

Operational activities may include:

- Excavation and ore extraction;
- Ore hauling and stockpiling;
- Crushing and screening;
- Gravity concentration;
- Limited controlled chemical-assisted processing where necessary;
- Storage and handling of hazardous materials;
- Waste-rock and residue management;
- Rehabilitation of disturbed areas.

The operation has specifically been designed to reduce environmental risk through:

- Reduced operational footprint;
- Dry-stack residue management;
- Reduced water consumption;
- Controlled hazardous-material systems;
- Progressive rehabilitation.

2.2 Mining and Processing Activities

Mining activities may involve shallow hard-rock excavation using conventional small-scale mining methods.

Ore-processing activities may include:

- Crushing and milling;
- Gravity separation;
- Concentrate handling;
- Limited controlled reagent-assisted recovery where operationally required.

Mercury amalgamation shall not be permitted at any stage of the proposed operation.

2.3 Supporting Infrastructure

Supporting infrastructure associated with the proposed operation may include:

- Access roads;
- Ore stockpile areas;
- Processing plant areas;
- Fuel-storage areas;
- Workshops and storage areas;
- Hazardous-material storage areas;
- Waste and residue-storage areas;
- Stormwater-control systems.

3. DESCRIPTION OF THE RECEIVING ENVIRONMENT

3.1 Regional Setting

The proposed project area is situated within the Kunene Region of north-western Namibia, characterized by semi-arid climatic conditions, sparse vegetation cover and limited surface-water availability.

The region is environmentally sensitive due to:

- Low rainfall;
- High evaporation rates;
- Dependence on groundwater resources;
- Surface-instability susceptibility;

- Slow ecological recovery rates.

3.2 Climate

The project area experiences a semi-arid climate characterized by:

- Low and variable annual rainfall;
- High summer temperatures;
- High evaporation rates;
- Seasonal runoff associated with rainfall events.

These climatic conditions increase the importance of:

- Groundwater protection;
- Stormwater management;
- Dust suppression;
- Erosion prevention.

3.3 Geology and Hydrogeology

The area is underlain by lithologies associated with north-western Namibian geological terranes, with localized hard-rock mineralization hosting gold mineralization.

Groundwater occurrence is expected to remain structurally controlled and limited within fractured-rock aquifer systems.

Groundwater sensitivity remains significant due to:

- Low recharge rates;
- Dependence on groundwater resources;
- Semi-arid environmental conditions.

4. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

4.1 Introduction

The proposed small-scale gold mining operation shall be undertaken in accordance with applicable Namibian environmental, mining, water-resource and occupational health and safety legislation. The legal and administrative framework establishes the regulatory basis through which environmental compliance, environmental monitoring and operational accountability shall be maintained throughout the life of mine.

The Project Proponent acknowledges that compliance with environmental legislation and permit conditions remains mandatory throughout:

- Site establishment;
- Construction activities;
- Mining operations;
- Ore-processing activities;
- Hazardous-material handling;
- Rehabilitation activities;
- Closure and post-closure phases.

4.2 Environmental Management Act, 2007

The Environmental Management Act, 2007 (Act No. 7 of 2007) establishes the primary environmental-management framework applicable to the proposed operation.

The Act specifically requires:

- Environmental assessment of listed activities;
- Environmental authorization prior to commencement of activities;
- Public participation and stakeholder engagement;
- Implementation of environmental-management measures;
- Prevention of environmental degradation;
- Environmental monitoring and compliance.

The Environmental Management Plan (EMP) has therefore been prepared to support environmental compliance and implementation of mitigation measures associated with the proposed operation.

4.3 Environmental Impact Assessment Regulations, 2012

The Environmental Impact Assessment Regulations establish procedural requirements relating to:

- Environmental assessment;
- Environmental Clearance Certificate applications;
- Public consultation;
- Environmental-management obligations;
- Environmental reporting and auditing.

The public participation process undertaken for the proposed project was conducted in accordance with these regulations.

4.4 Minerals (Prospecting and Mining) Act, 1992

The Minerals (Prospecting and Mining) Act governs mining and mineral-right activities within Namibia.

The Act establishes obligations relating to:

- Mining operations;
- Environmental protection;
- Rehabilitation obligations;
- Operational safety;
- Closure responsibilities.

The Project Proponent shall ensure that mining activities remain consistent with applicable mining legislation and permit conditions.

4.5 Water and Groundwater Protection Legislation

Groundwater protection remains a critical environmental-management priority associated with the proposed operation due to:

- Semi-arid environmental conditions;
- Dependence on groundwater resources;
- Low groundwater recharge potential.

Applicable water-resource legislation and groundwater-protection obligations have therefore been incorporated directly into this EMP.

Groundwater-protection measures established within this EMP include:

- Groundwater monitoring;

- Spill prevention and spill-response systems;
- Hazardous-material management;
- Controlled residue management;
- Stormwater-management systems.

4.6 Occupational Health and Safety Requirements

Occupational health and safety requirements applicable to the proposed operation include:

- Safe hazardous-material handling;
- Emergency preparedness;
- Spill-response capability;
- Worker protection measures;
- PPE requirements.

Environmental management and occupational safety shall remain integrated throughout operational phases.

4.7 International Best-Practice Principles

The EMP further incorporates internationally recognized environmental-management principles including:

- Pollution prevention;
- Groundwater protection;
- Progressive rehabilitation;
- Adaptive environmental management;
- Continuous environmental improvement.

Operational environmental-management systems established within this EMP therefore aim to align with responsible mining and environmental best-practice principles.

5. ENVIRONMENTAL MANAGEMENT OBJECTIVES

The primary environmental-management objectives associated with the proposed operation are to:

- Prevent groundwater contamination;
- Minimize environmental disturbance;
- Prevent uncontrolled pollution;
- Ensure environmentally responsible hazardous-material management;
- Minimize dust generation and erosion;
- Support progressive rehabilitation;
- Ensure environmentally responsible closure.

5. IMPACT MANAGEMENT AND MITIGATION MEASURES

5.1 Groundwater Protection

Groundwater protection shall remain the highest environmental-management priority throughout all operational phases.

Groundwater-protection measures shall include:

- Controlled hazardous-material storage;
- Spill-prevention systems;
- Bunded fuel-storage areas;
- Groundwater-monitoring programmes;
- Spill-response procedures;
- Controlled residue management.

No hazardous materials shall be discharged directly into the environment.

5.2 Dust and Air-Quality Management

Dust generation associated with mining, hauling and processing activities shall be minimized through:

- Controlled vehicle movement;
- Speed limitations;
- Controlled operational housekeeping;
- Dust suppression where necessary.

Operational dust inspections shall be undertaken routinely.

5.3 Hazardous-Material Management

Hazardous materials associated with the proposed operation may include:

- Diesel and hydrocarbons;
- Lubricants and oils;
- Controlled processing reagents.

Hazardous-material management measures shall include:

- Bunded storage systems;
- Spill kits and spill-response equipment;

- Routine inspections;
- Controlled transfer procedures;
- Personnel training.

5.4 Waste and Residue Management

Waste-management systems shall prioritize:

- Waste minimization;
- Waste segregation;
- Controlled hazardous-waste storage;
- Reduction of contamination pathways.

Dry-stack residue management shall be utilized in order to:

- Reduce seepage potential;
- Reduce groundwater contamination risk;
- Improve closure stability.

5.5 Stormwater and Erosion Management

Stormwater-management systems shall aim to:

- Prevent uncontrolled runoff;
- Reduce erosion;
- Prevent sediment transport;
- Protect operational infrastructure.

Stormwater controls may include:

- Diversion berms;
- Drainage channels;
- Sediment traps;
- Surface stabilization measures.

5.6 Rehabilitation and Closure

Progressive rehabilitation shall be implemented throughout operational phases wherever feasible.

Rehabilitation measures may include:

- Surface stabilization;
- Recontouring;

- Erosion-control measures;
- Topsoil redistribution;
- Rehabilitation of inactive operational areas.

Closure planning shall prioritize:

- Groundwater protection;
- Long-term surface stability;
- Removal of hazardous materials;
- Reduction of residual environmental liability.

6. ROLES, RESPONSIBILITIES AND INSTITUTIONAL ARRANGEMENTS

6.1 Introduction

Effective implementation of this EMP requires clear environmental responsibilities, operational accountability and institutional coordination throughout the life of mine.

Environmental responsibilities established within this EMP apply to:

- The Project Proponent;
- Site management;
- Environmental personnel;
- Operational supervisors;
- Employees;
- Contractors and service providers.

All personnel associated with the proposed operation shall remain responsible for complying with environmental procedures and operational environmental requirements established within this EMP.

6.2 Project Proponent Responsibilities

The Project Proponent shall remain ultimately responsible for:

- Overall EMP implementation;
- Environmental compliance;
- Provision of environmental resources and operational controls;
- Environmental monitoring and reporting;
- Rehabilitation and closure obligations.

The Project Proponent shall further ensure that:

- Environmental-management systems remain operational throughout the life of mine;
- Environmental risks are managed appropriately;
- Environmental incidents are addressed rapidly;
- Environmental auditing and corrective-action systems remain operational.

6.3 Environmental Officer Responsibilities

An Environmental Officer or designated environmental representative shall be responsible for:

- Routine environmental inspections;

- Environmental monitoring activities;
- Environmental reporting and recordkeeping;
- Spill-response coordination;
- Environmental training and awareness;
- Environmental auditing support.

The Environmental Officer shall further:

- Identify environmental-management deficiencies;
- Support corrective-action implementation;
- Monitor compliance with EMP requirements.

6.4 Operational Supervisor Responsibilities

Operational supervisors shall:

- Implement operational environmental controls;
- Ensure personnel follow environmental procedures;
- Prevent unsafe or environmentally harmful operational practices;
- Report environmental incidents immediately.

Supervisors shall specifically monitor:

- Hazardous-material handling;
- Waste management;
- Dust generation;
- Operational housekeeping;
- Spill risks.

6.5 Contractor Responsibilities

All contractors and service providers associated with the proposed operation shall:

- Comply with EMP requirements;
- Participate in environmental induction and awareness training;
- Follow hazardous-material and waste-management procedures;
- Report environmental incidents immediately.

Contractors shall not undertake operational activities in a manner that may result in:

- Environmental contamination;
- Uncontrolled spills;
- Groundwater pollution;
- Unnecessary environmental disturbance.

7. CONSTRUCTION PHASE ENVIRONMENTAL MANAGEMENT

7.1 Introduction

Construction and site-establishment activities associated with the proposed operation may result in:

- Surface disturbance;
- Dust generation;
- Noise generation;
- Localized erosion;
- Spill and contamination risks.

Construction-phase environmental-management measures established within this EMP therefore aim to minimize environmental disturbance and protect surrounding environmental receptors.

7.2 Site Preparation and Vegetation Clearing

Vegetation clearing and site preparation shall remain restricted to approved operational areas only.

Construction activities shall:

- Minimize unnecessary vegetation disturbance;
- Utilize designated operational routes;
- Prevent unnecessary surface degradation;
- Protect drainage pathways where feasible.

Topsoil shall be conserved where practical for future rehabilitation activities.

7.3 Dust and Air-Quality Management During Construction

Dust generation during construction activities shall be minimized through:

- Controlled vehicle movement;
- Reduced vehicle speeds;
- Controlled operational housekeeping;
- Dust suppression where necessary.

Construction-related dust shall remain subject to routine inspection and monitoring.

7.4 Fuel and Hazardous-Material Management During Construction

Fuel and hazardous materials associated with construction activities shall:

- Remain stored within designated areas;
- Utilize bunded containment systems;
- Remain subject to spill-prevention procedures.

Spill kits and emergency-response equipment shall remain available throughout construction phases.

7.5 Construction Waste Management

Construction waste shall be:

- Segregated appropriately;
- Stored within designated areas;
- Removed routinely from operational areas.

Hazardous construction waste shall remain subject to controlled disposal procedures.

7.6 Construction Rehabilitation Measures

Temporary construction disturbances shall be rehabilitated progressively wherever feasible.

Rehabilitation measures may include:

- Surface stabilization;
- Topsoil redistribution;
- Erosion-control measures;
- Rehabilitation of temporary work areas.

8. OPERATIONAL PHASE ENVIRONMENTAL MANAGEMENT

8.1 Introduction

Operational activities associated with the proposed small-scale gold mining operation represent the primary source of potential environmental impacts.

Operational environmental-management systems established within this EMP therefore prioritize:

- Groundwater protection;
- Hazardous-material management;
- Spill prevention;
- Waste and residue management;
- Dust and erosion control;
- Rehabilitation and closure planning.

Operational environmental-management systems shall remain active throughout the life of mine.

8.2 Mining Operations Management

Mining activities shall:

- Remain restricted to approved operational areas;
- Minimize unnecessary disturbance;
- Prevent uncontrolled erosion and runoff.

Mining areas shall remain subject to:

- Environmental inspections;
- Dust-control measures;
- Stormwater-management procedures;
- Progressive rehabilitation measures.

8.3 Ore Processing Environmental Controls

Ore-processing activities shall be undertaken according to controlled operational procedures intended to:

- Reduce contamination risks;
- Minimize chemical usage;
- Prevent uncontrolled discharges;

- Reduce residue-management liabilities.

Mercury amalgamation shall not be permitted.

Controlled reagent-assisted processing, where required operationally, shall remain subject to:

- Hazardous-material controls;
- Spill-prevention systems;
- Monitoring and inspection procedures.

8.4 Groundwater Protection Measures

Groundwater protection remains the highest environmental-management priority associated with the proposed operation.

Groundwater-protection measures shall include:

- Groundwater-monitoring boreholes;
- Bunded hazardous-material storage;
- Spill-response capability;
- Controlled stormwater management;
- Routine inspections and monitoring.

Groundwater monitoring shall evaluate:

- pH;
- Electrical conductivity;
- Sulphates;
- Hydrocarbon indicators;
- Heavy metals where necessary.

8.5 Dust and Air-Quality Management During Operations

Dust generation associated with:

- Mining;
- Hauling;
- Crushing;
- Vehicle movement

shall remain subject to routine inspection and operational control.

Dust-management measures may include:

- Reduced vehicle speeds;
- Controlled operational routes;

- Dust suppression where necessary;
- Controlled stockpile management.

8.6 Waste and Residue Management During Operations

Operational waste-management systems shall prioritize:

- Waste minimization;
- Waste segregation;
- Controlled hazardous-waste storage;
- Reduction of contamination pathways.

Dry-stack residue systems shall:

- Remain structurally stable;
- Remain protected from erosion;
- Remain subject to routine monitoring and inspection.

8.7 Stormwater and Erosion Control During Operations

Stormwater-management systems shall:

- Prevent uncontrolled runoff;
- Reduce erosion;
- Protect operational infrastructure;
- Prevent sediment transport.

Stormwater controls may include:

- Diversion berms;
- Sediment traps;
- Drainage channels;
- Surface stabilization measures.

9. HAZARDOUS MATERIALS, WASTE AND RESIDUE MANAGEMENT

Environmental monitoring shall be undertaken throughout operational phases in order to:

- Detect environmental impacts early;
- Verify effectiveness of mitigation measures;
- Support environmental compliance;
- Support adaptive environmental management.

Monitoring may include:

- Groundwater-quality monitoring;
- Dust inspections;
- Hazardous-material inspections;
- Waste and residue inspections;
- Stormwater inspections;
- Rehabilitation monitoring.

7. ENVIRONMENTAL INSPECTIONS AND AUDITING

Environmental inspections shall be undertaken routinely in order to:

- Identify environmental risks;
- Detect environmental non-compliance;
- Verify implementation of mitigation measures;
- Support corrective-action implementation.

Environmental auditing shall remain applicable throughout the life of mine.

8. SPILL PREVENTION AND EMERGENCY RESPONSE

Spill prevention and emergency-response systems shall remain operational throughout all project phases.

Spill-response measures shall include:

- Spill kits;
- Emergency communication procedures;
- Spill-response training;
- Spill containment procedures;
- Incident reporting and corrective-action systems.

Major environmental incidents shall be reported to relevant authorities where required.

10. ENVIRONMENTAL MONITORING, AUDITING AND COMPLIANCE MANAGEMENT

10.1 Environmental Monitoring Programme

Environmental monitoring shall remain operational throughout the life of mine in order to:

- Detect environmental impacts at an early stage;
- Verify effectiveness of mitigation measures;
- Support environmental compliance;
- Support adaptive environmental management.

Environmental monitoring may include:

- Groundwater-quality monitoring;
- Hazardous-material inspections;
- Waste and residue inspections;
- Dust inspections;
- Rehabilitation monitoring.

10.2 Environmental Inspection Programme

Environmental inspections shall be conducted routinely in order to:

- Identify environmental-management deficiencies;
- Detect contamination risks;
- Support corrective-action implementation;
- Verify EMP compliance.

Inspection records shall remain:

- Updated routinely;
- Accessible for auditing and review;
- Integrated into environmental-reporting systems.

10.3 Spill Prevention and Emergency Response

Spill-prevention systems shall remain operational throughout all project phases.

Spill-response procedures shall include:

- Spill containment;
- Spill cleanup;
- Incident reporting;

- Emergency communication;
- Corrective-action implementation.

Spill-response equipment shall remain accessible within hazardous-material handling areas.

10.4 Environmental Incident Reporting

Environmental incidents shall:

- Be reported immediately;
- Be investigated appropriately;
- Trigger corrective-action procedures where necessary.

Environmental incident records shall support:

- Environmental auditing;
- Compliance verification;
- Continuous environmental improvement.

10.5 Environmental Training and Awareness

All personnel associated with the proposed operation shall receive environmental induction and awareness training.

Training programmes shall include:

- Hazardous-material handling;
- Spill prevention and spill response;
- Groundwater protection;
- Waste management;
- Emergency-response procedures;
- Environmental incident reporting.

Environmental-awareness programmes shall reinforce:

- Environmental accountability;
- Pollution prevention;
- Safe operational conduct.

10.6 Environmental Performance Indicators and KPIs

Environmental performance shall be evaluated through:

- Environmental monitoring systems;

- Environmental inspections;
- Environmental auditing;
- Environmental-performance indicators and KPIs.

KPIs may include:

- Groundwater-quality compliance;
- Spill incidents;
- Waste-management compliance;
- Dust-control performance;
- Rehabilitation performance.

Corrective actions shall be implemented where monitoring identifies environmental deterioration or environmental non-compliance.

11. REHABILITATION, CLOSURE AND POST-CLOSURE MANAGEMENT

All personnel associated with the proposed operation shall receive environmental induction and awareness training.

Training programmes shall include:

- Hazardous-material management;
- Spill prevention and spill response;
- Groundwater protection;
- Waste management;
- Emergency-response procedures;
- Environmental incident reporting.

10. ENVIRONMENTAL PERFORMANCE, COMPLIANCE AND REPORTING

Environmental performance shall be evaluated through:

- Environmental monitoring systems;
- Environmental inspections;
- Environmental auditing;
- Environmental-performance indicators and KPIs.

Corrective actions shall be implemented where:

- Environmental non-compliance is identified;
- Monitoring identifies environmental deterioration;
- Environmental incidents occur.

11. REHABILITATION LIABILITY AND CLOSURE FRAMEWORK

The Project Proponent commits to:

- Progressive rehabilitation;
- Reduction of long-term environmental liability;
- Environmentally responsible closure implementation;
- Post-closure monitoring where necessary.

Financial provisioning considerations shall include:

- Rehabilitation activities;
- Infrastructure removal;
- Hazardous-material cleanup;
- Residue stabilization;
- Post-closure monitoring.

12. PUBLIC PARTICIPATION AND STAKEHOLDER ENGAGEMENT

12.1 Introduction

Public participation and stakeholder engagement associated with the proposed operation were undertaken in accordance with the Environmental Management Act, 2007 and the Environmental Impact Assessment Regulations, 2012.

The consultation process aimed to:

- Inform stakeholders regarding the proposed project;
- Identify environmental and socio-economic concerns;
- Provide opportunity for stakeholder participation;
- Support informed environmental decision-making.

12.2 Stakeholder Identification and Notification

Stakeholders identified during the consultation process included:

- Adjacent landowners and occupiers;
- Local community members;
- Relevant Traditional Authorities;
- Kunene Regional Council;
- Relevant government authorities;
- Interested and Affected Parties (I&APs).

Stakeholder notification methods included:

- Written notices;
- Background Information Documents (BIDs);
- Stakeholder meetings;
- Consultation engagement.

12.3 Stakeholder Concerns and Responses

Stakeholder concerns raised during consultation included:

- Groundwater contamination risks;
- Dust generation;
- Hazardous-material management;
- Rehabilitation of disturbed areas;
- Employment opportunities;
- Surface disturbance.

These concerns were considered during the environmental assessment and incorporated into mitigation measures and operational controls established within this EMP.

12.4 Consultation Recordkeeping

Consultation records associated with the project may include:

- Stakeholder registers;
- Attendance registers;
- Meeting minutes;
- Written comments and representations;
- Proof of stakeholder notification.

Consultation documentation shall remain attached within the annexures of the EMP where applicable.

13. REFERENCES

Public participation associated with the proposed operation was undertaken in accordance with the Environmental Management Act, 2007 and the Environmental Impact Assessment Regulations, 2012.

Consultation activities included:

- Notification of stakeholders;
- Registration of Interested and Affected Parties (I&APs);
- Stakeholder meetings and consultation;
- Collection and consideration of stakeholder comments and concerns.

13. REFERENCES

This EMP was prepared with reference to:

- Environmental Management Act, 2007;
- Environmental Impact Assessment Regulations, 2012;
- Minerals (Prospecting and Mining) Act, 1992;
- Applicable Namibian environmental and mining legislation;
- International environmental-management principles and best-practice guidance.

14. ANNEXURES

Annexures associated with this EMP may include:

- Environmental monitoring schedules;
- Environmental inspection checklists;
- Spill-response procedures;
- Emergency-contact registers;
- Environmental training records;
- Stakeholder consultation records;
- Environmental-performance indicators and dashboards;
- Rehabilitation and closure records;
- Environmental figures, maps and diagrams.

FINAL EMP IMPLEMENTATION DECLARATION

The Project Proponent hereby commits to implementing all environmental-management measures, monitoring systems, mitigation measures, rehabilitation commitments and operational controls established within this Environmental Management Plan.

Provided that all environmental-management measures and operational controls established within this EMP are fully implemented, the proposed operation is expected to remain:

- Operationally manageable;
- Environmentally controllable;
- Groundwater protective;
- Compatible with environmentally responsible mining practices within the receiving environment of the Kunene Region.

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