

ENVIRONMENTAL MANAGEMENT PLAN

EXPLORATION ACTIVITIES FOR INDUSTRIAL MINERALS ON MINING CLAIM 70812 IN ERONGO REGION

APP: 004443

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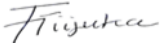

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ABBREVIATIONS

CFP	Chance Finds Procedure
ECC	Environmental Clearance Certificate
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
MC	Mining Claim
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy

1. INTRODUCTION

1.1 Project Overview

The proponent, Mr. Vincente Anthony Greeff, aims to conduct exploration activities for Industrial Minerals on mining claim 70812 in Erongo region. The Mining claim measures 17.1615 hectares (ha) in size. GPS coordinates: latitude -21.128149° and longitude 14.883120° E.

This proposed project is a listed activity in terms of the Environmental Management Act (EMA). Before commencing of this proposed project, approval is required for an Environmental Clearance Certificate (ECC) to be issued by the competent authority to the proponent, as in terms of the Environmental Management Act No.7 of 2007 and its EIA regulations of 2012.

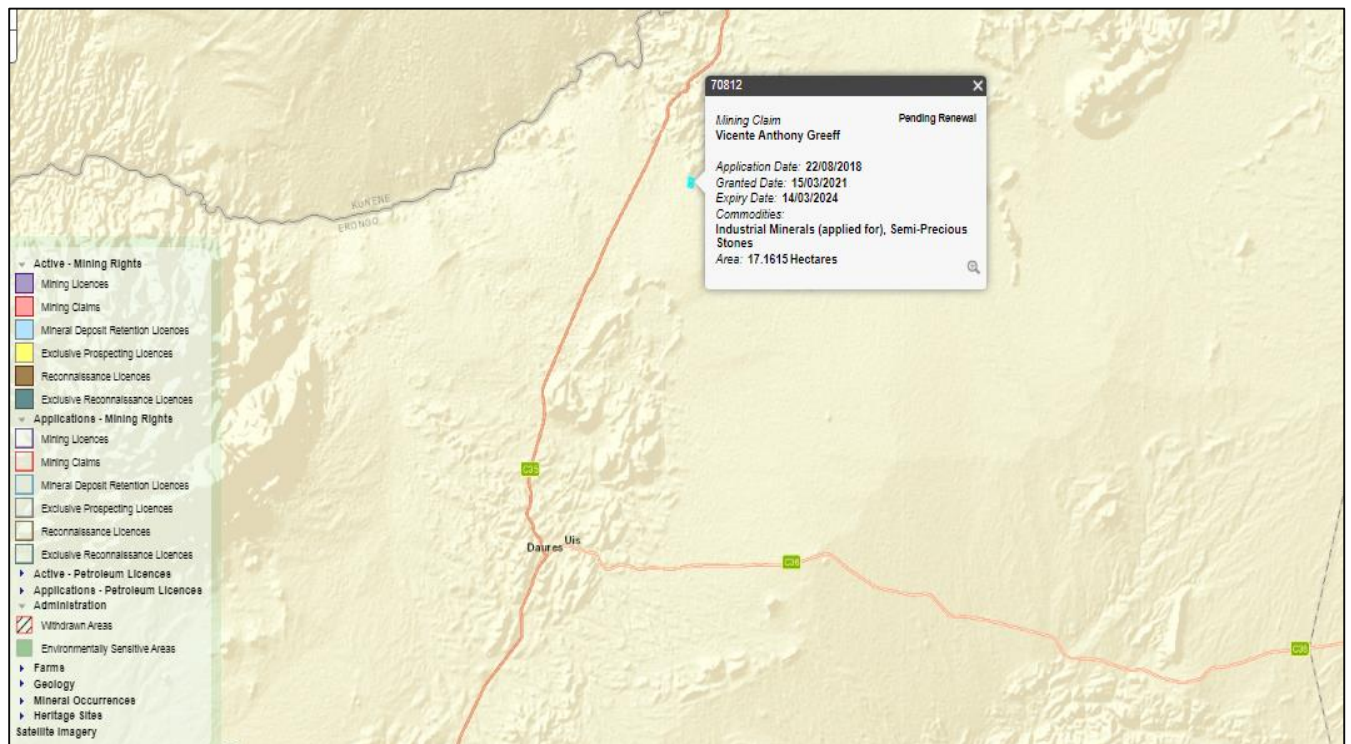


Fig 1: Location of Mining Claim 70812

Source: <https://maps.landfolio.com/Namibia/>

1.2 Purpose and Scope of the EMP

The information enclosed in this EMP is based on the project description as provided in the environmental scoping report. This EMP provides a reasonable outline, projected mitigation measures and management approaches for the exploration activities related with the proposed project to make sure potential environmental and social impacts are mitigated and reduced; to ensure that legislative and other permissible obligations are complied with adhered to all the time.

Well-defined in the EMP are the practices, techniques, roles and responsibilities to make sure the administration schedules are efficiently and correctly implemented. This EMP report is an add-on to the environmental scoping report. This Environmental Management Plan shall be updated when there are changes in the scope of works.

The work force working on this planned project shall be by law mandatory to comply and adhere to the principles as set out in this EMP. The scope of this Environmental Management Plan takes note of all undertakings that will be conducted during the exploration phase in the search for industrial minerals on Mining Claim 70812.

1.3 Compliance to the EMP

This EMP is a legally binding document as stipulated in the Environmental Management Act, 2007 (Act No. 7 of 2007). The Proponent, contractors and employees must therefore adhere and comply with the context of this document. Any changes made dependent on the changing environments and new additional information that may be available in the future, must be revised consequently with the provision of the EMA.

Non-compliance shall be recorded, including a brief explanation and the cause for the non-compliance, the person responsible, the consequence, and the correct action taken and any follow up measures required.

1.4 Limitations and Assumptions

The Safety Management Plan shall be developed by the Proponent. This EMP is based on the project description in the Environmental Scoping Report.

2. REGULATORY FRAMEWORK

2.1 Environmental Requirement

This anticipated project is a listed activity as specified in the Environmental Management Act No. 7 of 2007; and the Environmental Impact Assessment Regulation No. 30 of 2012. As a listed activity an application for an Environmental Clearance Certificate is required. An Environmental Scoping Assessment Report and Environmental Management Plan are required as part of the Environmental Clearance Certificate application to supplement the process.

This Environmental Management Plan has been embarked on in accord with the requirements of the Environmental Management Act, No. 7 of 2007 and its Environmental Impact Assessment (EIA) Regulations.

Table 1: Associated Legislations, Acts and Policies of significance

Legislation	Applicability	Legislation Objective(s)
The Namibian Constitution	To maintain the ecosystems, ecological processes and biological diversity by conducting Environmental Impact Assessment (EIA).	“The state shall actively promote and maintain the welfare of the people by adopting policies that are aimed at...maintenance of ecosystems, essential ecological processes and the biological diversity of Namibia and utilization of natural resources on a sustainable basis for the benefit of all Namibians, both for present and future”.

Environmental Management Act No.7 of 2007	Legal requirement to carry out an Environmental Impact Assessment (EIA).	The Environmental Management Act No.7 of 2007 promotes the sustainable management of the environment and the use of natural resources and provides for the process of assessment and control of activities which may have significant effects on the environment; and provides for incidental matters. The Act ensures that potential impacts are considered, a comprehensive stakeholder's consultation is carried out, all interested and affected parties are given a chance to comment/object on the project. The Act as well provides a list of activities that may not be undertaken without an Environmental Clearance Certificate.
Environmental Impact Assessment (EIA) Regulations (GN notice No. 30 of 2012)	Provides guidelines for Environmental Assessments.	Provides procedures for Environmental Assessments.
	Governs all mining activities in the country.	To provide for the reconnaissance,

Minerals (Prospecting and Mining) Act No.33 of 1992 As amended Minerals (Prospecting and Mining) Amendment Act 8 of 2008		prospecting and mining for, and disposal of, and the exercise of control over, minerals in Namibia; and to provide for matters incidental thereto
Public Health Act No. 36 of 1919	Safeguards the public is protected from noise, dust and air pollution.	No person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.
Water Resources Management Act No. 11 of 2013	Guarantees that the water systems are not polluted and that pollution control mechanisms are in place.	An Act to provide for the management, protection, development, use and conservation of water resources; to provide for the regulation and monitoring of water services and to provide for incidental matters.
Environmental Policy Framework (1995)	Provides guidelines for EIA.	The Policy ensures that all developmental projects are subjected to environmental assessments so that all potential impacts are taken into consideration and incorporated into

		the planning and development stages.
Labour Act No. 11 of 2007	Regulates labour in general, remuneration, etc in the country.	<p>The Labour Act regulates labour in general and protects the safety, health and welfare of employees.</p> <p>The regulation of 1997 relating to the safety and health of employees at work, sets out the duties of employers, welfare and facilities at the work place.</p>
Soil Conservation Act No. 76 of 1969	Promotes soil conservation.	The Act promotes the conservation of soil and the prevention of soil erosion.
National Heritage Act No. 27 of 2004	Provides protection and conservation of places and objects that has national heritage significance; and the registration of such places or objects.	<p>The Act makes provision for the protection of places and objects of heritage significance and the registration of such places</p> <p>And objects. Section 46 of the Act, further prohibits the removal, damage, alteration, excavation of national sites or remains; and Section 48, sets out the procedure for</p>

		application and granting permits for exploration activities such as trenching, drilling, etc.
Hazardous substances Ordinance No. 14 of 1974	Controls the handling of hazardous substances such as fuel, fire, etc.	The Ordinance controls the handling of hazardous substances such as manufacturing, imports and exports to ensure human and environmental safety.
Petroleum Product and Energy Act No, 13 of 1990	Provides for the safe handling of the petroleum products such as fuel and lubricants	The Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.
Word's Best Practices	Precautionary Approach Principle (Polluter Pays Principle). In cases of pollution, the proponent accepts the full responsibility to clean up the environment in a friendly way.	Contaminator/polluter must be responsible to clean up the environment.

3. PROJECT PERSONNEL, ROLES AND RESPONSIBILITIES

The Proponent shall be in possession of the Environmental Clearance Certificate (ECC) for this proposed project and shall be liable for the implementation and administration of this Environmental Management Plan. The implementation, monitoring and administration of this Environmental Management Plan shall be conducted on daily responsibilities and monthly reviews. All contractors should be guided by this EMP.

The proponent shall arrange for a project crew to manage and carry out the work and exploration activities comprising of the proponent's personnel and contractors. One worker shall be identified by the Proponent to help assist and support the Proponent at all times for the duration of the project.

The proponent shall be liable to make sure that the project crew, suppliers and/or contractors, adhere and comply with the set out measures in this Environmental Management Plan; guarantee that all employees get satisfactory training and coaching; and that environmental responsibilities are clearly agreed and understood.

3.1 Roles and Responsibilities

The table below displays the roles and responsibilities of the Proponent, contractors and workers for the anticipated project.

Table 2: Roles and Responsibilities

ROLE	RESPONSIBILITIES
ENVIRONMENTAL COMPLIANCE OFFICER (ECO)	The Ministry of Environment, Forestry and Tourism (MEFT) is the overseer of environmental protection. The ECO shall be an appointed Environmental Officer from the Directorate of Environmental Affairs trusted to impose compliance. The ECO may carry out inspections and monitoring any time to ensure compliance.
PROPONENT OR PROPONENT'S REPRESENTATIVE	<ul style="list-style-type: none"> ○ Overall responsibility for the implementation, administration and management of this EMP; ○ Responsible for providing the required resources (including financial and technical) for all responsibilities; ○ Employ Managers such as a Project Manager and/or a Site Manager; ○ Guarantee that all employees, contractors and visitors get inductions on environmental measures as defined in the scoping and EMP reports and safety measures as compiled by the proponent. ○ Ensure the environmental rules are communicated to all personnel and that all staffs, contractors, visitors understand comply with the EMP.
PROJECT/SITE MANAGER	<ul style="list-style-type: none"> ○ Ensure all employees and contractors take part in a site induction procedure before they commence work.

	<ul style="list-style-type: none"> ○ Keep community concerns and issues register. ○ Keep records of complaints; ○ Ensure that greatest environmental practice is carried out throughout the duration of the project; and report any non-compliance or accidents to the authority. ○ Responsible for compliance with this EMP, oversee all day to day activities during the duration of the project, including routine and non-routine maintenance works, and decommissioning; ○ Make sure enough resources are available for the execution of this EMP; ○ Ensure that all employees, contractors and visitors to the site are familiar with the requirements of this EMP, significant to their roles at all times; ○ Responsible for environmental awareness and management training and site inductions for all employees, contractors and visitors; ○ Monitor everyday tasks and ensure devotion by employees to the EMP; ○ Receive, respond to and record complaints; and ○ Report any non-compliance or accidents to the proponent. ○ Accountable for management, maintenance and review of the Environmental Management Plan.
Personnel (and contractors and visitors)	<ul style="list-style-type: none"> ○ Accountable for reporting incidents, accidents, tasks and conditions/issues that differ from the EMP or that are not complying immediately to their supervisor;

	<ul style="list-style-type: none"> ○ Responsible for complying and adhering to this EMP for the duration of the project ○ Attend site inductions when required to do so; and ○ Ensure that enough information on activities, roles are provided and understood. ○ Ensure to wear personal protective clothing at all time when working;
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3. 2 Chance Finds Procedures

Archaeology Chance Finds Procedure (CFP) Implementation Roles. The following personnel have been assigned responsibilities as per the Chance Finds procedure:

Actions:

Action by person identifying archaeological or heritage material: Stop work immediately, identify the site with flag, and mark GPS position, and report discoveries to foreman,

Action by Foreman: report findings, site locality and actions taken to Project/Site Managers and Proponent cease any work in close area

Action by Project/Site Managers and Proponent: Visit the site and determine whether work can proceed without damage to discoveries, mark the boundary, wait for confirmation by archaeologist.

Action by archaeologist: Inspect site, give advice to National Heritage Council and request permission in writing to take out or remove discoveries from work area, wrap and tag the discoveries for relocation to National Museum.

3.3 Employment

The proponent shall make sure that local people have access to information about job opportunities; and that the unemployed living in the local area are considered first for employment positions; the total number of job opportunities shall be made known together with the related skills and qualifications; the employing process should be clearly explained and communicated; the duration

of the employment shall be clearly specified; and staffs with no proof of permanent residence shall not be employed.

3.4 Contractors

All appointed contractors during the exploration project shall make sure that correct actions are taken to report all likely environmental dangers/risks and cases/incidents to the Project Manager; conduct all activities in accordance with this Environmental Management Plan and associated policies, procedures, management plans, legislative requirements; and executing suitable environmental management measures.

3.5 Disciplinary Actions

Non-compliance to the EMP shall result in disciplinary legal action such as:

- Suspension of work;
- Monetary penalties.

The disciplinary action shall be determined as per the provision of EMA and relevant statutory framework. Under Section 27 (4), Any person who contravenes subsection (3) commits an offence and is on conviction liable to a fine not exceeding N\$500 000 or to imprisonment for a period not exceeding 25 years or to both such fine and such imprisonment”.

4. TRAINING AND COMMUNICATIONS

4.1 Emergency Response Services

All employees shall be made alert of the below emergency response numbers. These numbers will be posted on each site and made available in every company vehicle.

Table 3: Emergency Contact Numbers in Uis.

TOWN	WATER & SEWERAGE	POLICE	ELECTRICITY	CLINIC
Uis	064 504006	064 1-0111	064 50 4006	064 50 4011

4.2 Communication and Training

At all times during the exploration, the Project Manager shall communicate all environmental issues to the project team through audits, site inductions, site inspections; information on incident response actions; and meetings on specific environmental issues.

All Stakeholders should be aware of all possible impacts and how to reduce them. It is important to ensure that all stakeholders are well informed frequently and properly trained on functioning measures as required. All employees employed on the project shall be knowledgeable to execute responsibilities that are likely to cause an environmental impact.

All the workers involved in the project should understand why the environment needs to be protected, including the social aspects involved, how the exploration activities can impact the environment and possible mitigation measures.

This EMP should be given/distributed to Staffs and all contractors working on the exploration site to make sure that the environmental requirements are effectively communicated. Delicate tasks shall be communicated to workers and contractors.

Discussions among the management will take account of any complaints received and actions to resolve them, incidents and responses, assessments, audits and any goal achievements.

4.3 Induction

Inductions are important information meetings that assists to familiarize people with the locations, equipment, materials, processes and responsibilities they may encounter while working at or visiting a site for the first time.

To accomplish the best results, inductions need to be tailored and targeted. They should accommodate all workers (i.e. employees, contractors, trainees).

Workers shall need a refresher if:

- They have been absent for some time
- The work environment is different to that normally encountered (e.g. switching to night shift for first time).

4.3.1 Site inductions

Site inductions shall ensure that staffs receive appropriate information and, before commencing work, can recognize the hazards on site that can harm them. Workers should also understand the control measures in place to protect themselves from the hazards/incidents.

Induction requirements shall be determined using information sourced from:

- Legislative requirements
- Site specific competency and training needs analysis
- Standards applicable to site.

All site inductions shall contain an assessment to ensure the required knowledge has been retained by worker. It is important to examination the site's induction regularly to determine if the content is still related.

Site inductions shall include a formal program that provides workers with an understanding of:

- Site layout including emergency assembly points
- Emergency contact numbers
- The obligations of the proponent and employees
- Common likely incidents on the site and their control measures
- Basic environmental management principles to reduce negative impacts and tools used on site
- Reporting processes for incidents; and

- The standard behavior expected of workers on sites

4.4 Complaint Register

The personnel shall be informed about the complaints register, its location and the person responsible for keeping it, in order to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the entire period of the project; and shall be made available for government or public review upon request. It is the duty of the Project Manager to maintain a complaint register that has details of the names of the complainant, date and time of the complaint and actions taken to resolve the issues. The complainant shall be informed in writing of the results of the investigation and actions to be taken to rectify or address the matters.

4.5 Environmental Inspections and Compliance Monitoring

The Project Manager shall be in charge to make sure that this Environmental Management Plan is followed to and complied with at all times during the course of their everyday roles and to ensure that contamination control measures are obeyed to. Daily, weekly and monthly inspections shall be carried out.

5. ENVIRONMENTAL MANAGEMENT PLAN (EMP)

The general objective of the management actions of the EMP is to lessen the waste generation, low to zero contamination cases, minimal clearing of vegetation and earthworks, safeguard indigenous flora and fauna; and ensure least disruption to activities in the nearby farms.

The scope of this Environmental Management Plan is compiled with reference to the environmental assessment of the exploration activities and decommissioning stage of the proposed project. This Environmental Management Plan is intended by bearing in mind environmental, social, safety and occupational health characteristics related with this proposed exploration project.

The following provisions of the EMP shall apply to planning, construction and operation phases.

Table 4: Environment: Environmental Mitigation Measures to be implemented

PROBABLE IMPACT	MITIGATION MEASURE	MONITORING REQUIREMENTS	DUTIES
BIODIVERSITY LOSS/HABITAT DESTRUCTION	<ul style="list-style-type: none">*Employees should not be allowed to cut and collect firewood.*Employees should not be allowed to catch fish in the river.* Provide electricity or gas to workforce for cooking and heating to discourage firewood collecting.* Promote re-vegetation in cleared areas when the exploration activities will come to an end.*No animals must be killed unless it poses danger.	DAILY	PROJECT/SITE MANAGER EMPLOYEES, CONTRACTORS

	<p>*No domestic animals should be allowed at the site.</p> <p>*Prevent the destruction of protected species by minimizing clearance areas through proper planning of the proposed exploration activities.</p> <p>* Where possible, rescue and relocate plants of significance.</p>		
SOIL EROSION	<p>*Where possible, vegetation shall be cut at ground level, leaving the root system intact so as to limit soil erosion.</p> <p>*Land clearing will be conducted in a way that limits topsoil disturbances</p> <p>*Land shall be reclaimed as soon as possible and when that is done, topsoil shall be replaced on cleared areas.</p> <p>* Movement of all vehicles must strictly</p>	WEEKLY	PROJECT/SITE MANAGER,

	<p>be within the project site;</p> <p>*Sand and gravel loads from exploration trenches should be placed in designated areas;</p> <p>*Rehabilitate all sites upon completion of the project;</p> <p>*Exploration activities should be limited to potential targeted sites only in the Mining claim.</p>		
NOISE DISTURBANCE	<p>* Personnel must NOT be exposed to noise levels above the required 85dB, earmuffs must be provided.</p> <p>* All vehicles and machinery/equipment to be shut down between periods of use.</p> <p>*Noise nuisance shall monitored according</p> <p>* Residents shall be provided at least two (2) weeks' notice of drilling procedures within 1 km of their property.</p> <p>*If possible, use exploration equipment with low noise emission.</p>	<p>DAILY</p> <p>OR AS APPROVED BY MANAGEMENT</p> <p>NB: PUBLIC COMPLAINTS MUST BE RECORDED</p>	PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR

EMISSIONS AND DUST	<p>*Specific activities that may generate dust and impact on residents must be avoided during high wind events.</p> <p>*Monitoring stages of dust produced by project associated with vehicles dust control activities.</p> <p>*Limit vehicle speeds on roads to 30km/h.</p> <p>*During dry periods of the year, when the surface of roads are likely to cause significant dust, The proponent shall take effective steps to reduce dust.</p> <p>* Gravel or sand loads must be covered or frequently sprayed with water;</p> <p>*All vehicles and machinery/equipment to be shut down between periods when not in use.</p> <p>*Measures that may be utilized to control dust include: 1) Routine watering of roads and work sites; 2) Application of dust suppressants as a</p>	<p>DAILY, WEEKLY</p> <p>NB: PUBLIC COMPLAINTS MUST BE RECORDED DAILY, WEEKLY</p>	PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR
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	<p>longer term solution to road dust.</p> <p>*Use existing access roads and paths where possible.</p> <p>* Non-toxic human dust exposure levels may not exceed 5mg/m³ for respiratory dust and 15mg/m³ for dust in total as per Labour Act.</p> <p>*Engines must be switched off when vehicles are not in use.</p>		
SURFACE AND GROUNDWATER CONTAMINATION	<p>*Consider other sites when the water table is too high.</p> <p>*Drill structures should be dug to direct any unintended spills into sumps.</p> <p>*Waste water shall be contained.</p> <p>*Water from existing water sources shall be used in agreement with the owners of farms in the area,</p> <p>* Heavy drilling equipment should be carefully checked for leakages; and if</p>	DAILY/WEEKLY	PROJECT/SITE MANAGER, EMPLOYEES, CONTRACTOR

	refuelling is taking place on site it must either be on a tank mounted on stilts to prevent any leakage and contamination.		
SOIL AND WATER CONTAMINATION	<p>* For any spills and leaks, contaminated soils must be collected and disposed of at an approved local site.</p> <p>*All still vehicles and equipment must have drip trays to collect leakages of lubricants and oil.</p> <p>*Spills and leaks to be cleaned immediately.</p>	DAILY,WEEKLY	EMPLOYEES, CONTRACTOR, PROJECT/SITE MANAGER
WASTE GENERATION	<p>*Implement a standard waste management procedure for all types of wastes.</p> <p>*Waste should be disposed of at approved disposal sites only.</p> <p>*Recycle and Re-use where possible.</p> <p>*Wastewater should be contained and not disposed on site.</p> <p>*Provide temporary toilets in the ratio of 1:15 and 1:30 for</p>	<p>DAILY</p> <p>Wheelie bins and skip containers must be provided on site.</p>	EMPLOYEES, CONTRACTOR, PROJECT/SITE MANAGER

	<p>females and males; and effluent to be disposed of at the nearest local waste water treatment plant.</p> <p>*Functional toilets shall be on site.</p> <p>*No waste should be buried on site or in the surrounding areas.</p> <p>*Hazardous waste shall not be allowed on site</p>	Record effluent disposal	
SAFETY & HEALTH	<p>*Every employee must be provided with Personal Protective Equipment (PPE), ear smuffs, etc which must be worn at all times during working hours and/or when on site.</p> <p>* A required safety induction training course shall be given to all personnel.</p> <p>*The Proponent shall develop a health and safety</p> <p>*Clear health and safety signs at every selected areas, marked “ENTRANCE, EXIT, ASSEMBLY POINTS, DANGER ZONE, NO ENTRY, STAFF ONLY, etc.</p>	AS CERTIFIED BY THE APPROVED PERSONNEL (VISUAL SIGNS)	MANAGEMENT, EMPLOYEES & CONTRACTORS

ALIEN INVASIVE	*All alien invasive should be cleared out.	AT THE END OF THE EXPLORATION.	PROJECT/SITE MANAGER/ CONTRACTOR/ EMPLOYEES
VISUAL AND SENSE OF PLACE	*The proponent to ensure that rehabilitated areas balance in well with the natural environment. *Upon completion of the exploration, overburdens should be placed in the trenches and excavated areas and be levelled as part of the rehabilitation.	AT THE END OF EXPLORATION.	PROPONENT/ PROJECT/SITE MANAGER/ CONTRACTOR/ EMPLOYEES
WATER ABSTRACTION	*A valid water abstraction permit should be obtained from the MAWLR. * Observe and control water usage and minimise unnecessary use where necessary. *Re-use and Recycle water where possible. *Pollution or any noxious waste should not be allowed to enter the freshwater ecosystem.	OBTAIN A VALID WATER ABSTRACTION PERMIT (where required)	MANAGEMENT
EMPLOYMENT	*Hire local contractors. *Reasonable wages, compensation; and		PROPONENT/ PROJECT/SITE MANAGER

	<p>labour practise as per Namibian Labour Laws must be followed.</p> <p>* All general work must be set aside for local people except in positions requiring specialized skills.</p>		
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6. REHABILITATION AND DECOMMISSIONING

It shall be the Proponent's responsibility to conduct the decommissioning and rehabilitation exercise, which will be done as per the Proponent's decommissioning & rehabilitation Plan.

The Proponent shall make certain that the footprint of Project activities is lessened throughout the procedures and fully remediated following the end of operations.

A full rehabilitation and decommissioning executions should be done by the proponent, which shall contain the following: demolishing and removal of all temporary and permanent structures; a site cleanup shall be completed prior to land reclamation. The removal of all litter, barrels, cans, drums, contaminated materials from accidental spills and any other work refuse or excess materials, disturbed areas to be prepared accordingly; and retrieval of topsoil; any building rubble must be disposed of at local dumpsite/landfill and rehabilitation monitoring shall be completed respectively.