ENVIRONMENTAL MANAGEMENT PLAN:

FOR THE PROPOSED MINERAL EXPLORATION OF BASE AND RARE METALS, DIMENSION STONE, INDUSTRIAL MINERALS, AND PRECIOUS METALS ON EXCLUSIVE PROSPECTING LICENSE NO. 9251

KARASBURG DISTRICT, KARAS REGION - NAMIBIA

ECC APPLICATION NO.: 240725004449

APRIL 2025

COMPILED BY

SS CONSULTANTS

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DISCLAIMER

The author of this report has neither shares nor economic interest in EPL-9251. The report therefore is written without any conflict of interest. This is an Environmental Scoping Assessment (ESA) report, and the consultant also undertook field-based evaluation. It contains certain forward-looking statements which have been based solely on available literature as well as field data. SS Consultants will not be held responsible for any omissions and inconsistencies that may result from information that was not available at the time this document was prepared and submitted for evaluation. The authors' current expectations about future proceedings are subject to several risks and uncertainties beyond his/her control. Therefore, the author does not give assurance that such statements will prove to be accurate and future events could differ materially from those anticipated in such statements. Due care and attention have been taken in the preparation of this report. However, the information contained in this report (other than as specifically stated) has not been independently verified nor has it been audited. Accordingly, the company does not warrant or represent that the information contained in this report is accurate or complete.

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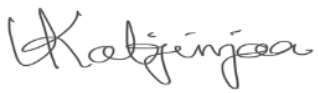
Signature			

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DEAF	Department of Environmental Affairs and Forestry
DWA	Department of Water Affairs
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
GG & GN	Government Gazette & Government Notice
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry & Tourism
PPE	Personal Protection Equipment

1 INTRODUCTION

1.1 Background Information

SS Consultants CC (herein referred to as the Consultant) has been appointed by Mr. Toivo Natangwe L. Megameno Iileka (herein referred to as *the Proponent*) to apply for and obtain an Environmental Clearance Certificate (ECC). The Proponent intends to explore for base and rare metals, dimension stone, industrial minerals, and precious metals on EPL No.9251. Prior to commencing with proposed exploration activities, an Environmental Impact Assessment (EIA) process undertaken by the Proponent is required, thus the 'pending' status for the application rights for the proposed exploration activities for base and rare metals, dimension stone, industrial minerals, and precious metals on EPL No.9251 as shown in **Figure 1-1** below.

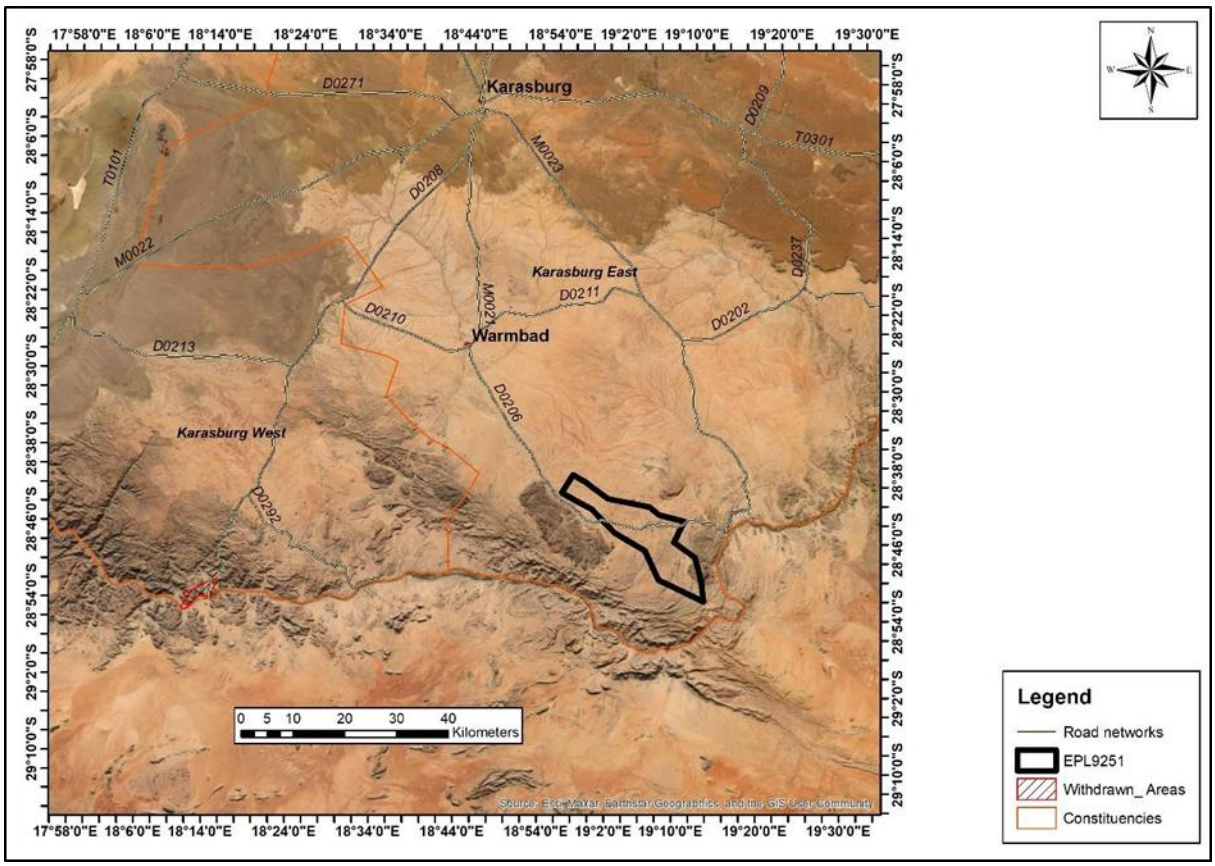

Figure 1-1: Locality Map for the project area

1.2 Purpose of the Environmental Management Plan

In Namibia, an Environmental Management Plan serves as a vital document for ensuring sustainable development and the protection of natural resources. Its sole purpose is to guide and regulate human activities to minimize negative environmental impacts and promote the conservation of Namibia's unique ecosystems, thereby providing a framework for implementing management actions described in Environmental Impact Assessments (EIAs).

This document outlines the mitigation, monitoring, and institutional measures to address potential environmental impacts, ensuring compliance with the Namibian context. It provides management measures to address the environmental effects that have been identified in the Environmental Scoping Assessment report and to provide possible mitigation measures/recommendations to address these impacts for the EPL.

Also outlined in the EMP are the procedures, roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented. All personnel working on the project will be legally required to comply with the standards set out in this EMP

1.3 Phases of the Proposed Mineral Exploration Activities

The core purpose of the Environmental Management Plan is to guide environmental management throughout the phases of the proposed exploration activities namely; planning, prospecting & exploration, and decommissioning & rehabilitation phase:

Table 1-1: Phases of the Proposed Mineral Exploration Activities.

Phase	**Management Requirement**
Planning	The Proponent prepares all the administrative and technical requirements needed for the actual works on the ground. ▪ Obtaining the necessary permitting and authorization from relevant national and local stakeholders,

	▪ Facilitating the recruitment and procurement processes in preparation for the exploration activities (and site maintenance).
Prospecting &Exploration	Facilitating the recruitment and procurement processes in preparation for the exploration activities (and site maintenance). ▪ Detailed search for and assessment of mineral resources, ▪ Maintenance of the area, equipment and machinery is done by the Proponent.
Decommissioning	The exploration activities on the EPL area cease ▪ The decommissioning of the EPL exploration activities may be considered due to poor results or declines in the focus commodity market price, ▪ Before the decommissioning phase, the Proponent would need to put site rehabilitation measures in place.

1.4 Legal Enforceability

The proposed project is considered as a listed activity as stipulated in the Environmental Management Act, No. 7 of 2007 and the Environmental Impact Assessment Regulation, No. 30 of 2012, a primary legal framework for environmental management in Namibia. As a listed activity, an application for an environmental clearance certificate is required. Furthermore, an Environmental Scoping Report and Environmental Management Plan are required as part of the environmental clearance certificate application, as well as to support the decision-making process.

2 DESCRIPTION OF MITIGATION MEASURES

Table 2-1: environmental risk assessment and mitigation measures.

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
ENVIRONMENTAL			
Access and Site preparation	- Introduction of alien species (plants and weeds can accidentally be introduced) - Disturbance and or injury to residing organisms	- Ensure the potential introduction and spread of alien plants is prevented, and - Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants. - Eradicate weeds and alien species as soon as they appear	- Exploration Manager - Employees, contractors - Site manager (or nominated site supervisor
	- Damage to cultural heritage resources	- Implementation of the Chance Find Procedure, - Ensure awareness about possible heritage finds and report all finds that could be of heritage importance - Exploration manager to visit the site and determine whether work can proceed without damage to findings.	

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
General exploration activities	- Visual disturbances - Change of Landscape - Dust and emissions	- Barriers or fences shall be used if drilling occurs in locations that may affect residents or livestock, - Residents need to be informed at least two weeks in advance that drilling operations are within 1km of their property, - Apply dust suppression where possible, - All vehicles and machinery / equipment to be shut down or throttled back between periods of use, - Restrict speed of vehicles (<30km/h), - Maintain continuous communication with I&APs to identify concerns and mitigation measures	- Exploration Manager - Employees, contractors - Site manager (or nominated site supervisor

	- Soil and Groundwater contamination	- Spill kits and absorption material available during fuel delivery, storage or use - Accidental spills and leaks to be cleaned soonest - Spills to be reported to the exploration manager - Fuel spills of greater than 200 litres to be reported to the authorities - Plant and equipment to be well maintained and serviced regularly (maintenance and service schedules in place), - In the field, hydrocarbons under 200 litres can be used for mobile refueling or servicing - Bulk fuel will be stored in adequate containment areas (on a non-porous floor, in a bunded area, capable of containing 110% of the volume stored) - Ensure drill pads and spill kits are in place, - Consider alternative sites when the water table is too high, - Drill system should be dug to direct any	

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
		accidental spills into sumps, - Wastewater shall be contained, - Where possible, water from existing water sources shall be used with a compensation agreement with - the farm owner in place, - Properly functioning chemical toilets shall be used only	
Clearing Vegetation for access routes and Camp setting	- Loss of plant species - Loss of habitat - Change in landscape	- Use existing roads for access to avoid new tracks and cut lines - Minimize clearance areas through proper planning of exploration activities and promote revegetation of cleared areas upon completion of exploration activities	- Exploration Manager - Employees, Contractors - Site manager (or site supervisor
SOCIAL			

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
General exploration activities	- Conflicting land uses and Consents - Disruption of farm operations (leaving gates open, loss of farming area, interference at waterpoints - Potential conflict with farm owners and neighbours (suspicious movement, poaching, stock theft, field fires, etc.)	- Ensure documented permission of who may enter the farms for exploration purposes is provided to the farmers - No unauthorized movement on farms is allowed, - Farmers should always have access to all farm areas - Existing water points and feeding area must remain unaffected.	- Exploration Manager - Employees, Contractors - Site manager (or site supervisor
Human Interactions/ Relations	- Community Exposure / Public to sexual transmitted diseases due to practice of unsafe sex - Drug and alcohol abuse	- Ensure training of staff in Health Education - Ensure adherence to the relevant health and safety legislation. - Ensure EMP training, and its execution thereof. - Ensure a copy of an EMP is present on site at all time	
ECONOMICAL			
Job creation, Business Opportunities	- Creation of new job opportunities	- Ensure knowledge and skill transfer during interactional meetings	- Exploration Manager

ACTIVITY	POTENTIAL IMPACTS	MITIGATION MEASURES	RESPONSIBILITY
	for local and regional people - Potential markets for the local businesses.	- Adopt recruitment policy ensuring equal job opportunities for the locals skilled and unskilled. - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible	

3 ORGANIZATIONAL ARRANGEMENTS

3.1 Roles and Responsibilities

The Proponent is ultimately responsibility for all stages of the project and the impacts resulting from those activities. It is also the Proponent's responsibility to appoint an Environmental Control Officer (ECO) and their responsibility to ensure that there is sound environmental compliancy.

Table 3-1: Roles And Responsibilities.

ROLE	RESPONSIBILITIES
Proponent	- Overall responsibility for the implementation and management of this EMP; - Ensure the environmental policy is communicated to all personnel throughout the proposed project and ensure that employees, contractors and visitors understand and adhere to the EMP; - Responsible for providing the required resources (including financial and technical) to complete the required tasks; - Appoint supervisors such as an exploration (project) manager and a site manager; - Ensure that all employees, contractors and visitors are inducted on environment measures as outline in the scoping and EMP reports, and safety measures as compiled by the proponent.
Exploration Manager	- Ensure a copy of an EMP is present on site at all times; - Responsible for ensuring compliance with this EMP including overseeing all day-to-day activities during the duration of the project, including routine and non-routine maintenance works, as well as the decommissioning of the project. - Ensure adequate resources and proper trainings are made available for implementation of this EMP; - Responsible for the management, maintenance and revisions of this EMP; - Ensure all employees and contractors participate in a site induction process (both for health and safety, and EMP) prior to commencing work on the project;

	- Maintain the community issues and concern register, and keep records of complaints; - Ensure that best environmental practice is undertaken throughout the duration of the project; and - Report any non-compliance or accidents to the regulatory authority.
Site Manager (or nominated supervisor) Employees	- Ensure that all employees, contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and adhere to regulations - Provide environmental awareness / management training and site inductions for all employees, contractors and visitors; - Monitor daily operations and ensure adherence by personnel to the EMP; - Receive, respond to and record complaints; and - Report any non-compliance or accidents to the explorations (project) manager.

3.2 Permits

All relevant permits shall be obtained from relevant authorities. These include:

- Environmental Clearance Certificate (ECC) by the Environmental Commissioner at MEFT: DEAF, and should be timely renewed, amended (if changes arise in the project description), if needed, transfer the ECC by submitting the application to the Environmental Commissioner and or cancel it if the project is discontinuing.
- EPL certificate from MME and should be timely renewed as required.
- Wastewater (effluent) handling and discharge permit from the Water Environment Division at MAWLR.
- Fuel Storage onsite (Consumer installation certificate) more than 600 litres from the MME.
- The removal or relocation of rare and endangered plants will be conserved, and should it be removed or relocated it shall be done with the required permits from the Directorate of Forestry at MEFT.

3.3 Site Induction

3.3.1 Training and Awareness

- All site personnel and site contractors will receive the training to equip them with the necessary knowledge to comply with the EMP.
- The exploration manager shall ensure that an appropriate level of training and competence is provided at all levels of site personnel.
- The Proponent and all site personnel (drilling including contractors) shall comply with the environmental management plan
- EMP trainings should be provided to all workers on site.
- A copy of the EMP must be available on site

3.3.2 Occupational Health and Safety

- All project personnel should receive a detailed induction upon joining the project and on a regular basis, if necessary, refresher training should be provided.
- Project workers should be inducted with an awareness training of the risks of mishandling equipment and materials on site and health & safety risk associated with their respective jobs.
- Ensure that all project personnel are provided with adequate and appropriate personal protective equipment (PPE) such as coveralls, gloves, safety boots, earplugs, dust masks, safety glasses. These are crucial to prevent potential injuries and excessive inhalation of dust or harmful gases.
- All site personnel should be aware of necessary health, safety, and environmental considerations applicable to their respective work.

3.3.3 Environmental and Emergency Response

The exploration/site manager shall develop an Emergency Response Plan for the exploration project to deal with any safety incidents or accidents occurring. The project site should be equipped with fully First Aid Kit onsite and two to three people should be trained on how to administer first aid on others.

Contact numbers for the following service providers should be clearly displayed on a notice board at the premises i.e. local police, fire brigade and ambulance.

3.4 Communication between Parties

Emphasis will be put towards open communication between all parties to reach a proactive approach towards potential environmental issues deriving from the project. This approach should guarantee that environmental impacts are anticipated and

prevented, or minimised, rather than adopting a negative “policing” approach after negative impacts have already occurred. The importance of a proactive approach cannot be overemphasised, particularly in relation to preventing unnecessary tracks, and damage to vegetation (i.e. protected and endemic species) as these impacts cannot easily be remedied.

4 LEGAL AND REGULATORY FRAMEWORK: PERMITS AND LICENSES

This chapter outlines all the relevant Namibian legislation, policies and guidelines that need to be adhered to for an effective EIA process. The review of the legal framework helps to inform the Proponent, affected, and interested communities, and the decision makers at the MEFT: DEAF about the requirements and expectations, as laid out in terms of these instruments, to be met so that the exploration activities could be conducted. This EMP was carried out based on the EMA No. 7 of 2007 and its EIA Regulations of 2021 (GG No. 4878 GN No. 30), and following the conditions set by EMA for obtaining an ECC for permission to conduct certain listed activities. The Proponent must equally ensure adherence to the regulations put in place by the Minerals (Prospecting and Mining) Act No. 33 of 1992 with regards to the exploration activities. The list of legal and regulatory requirements governing the project activities is provided in the Scoping Report. Thus, the legal section in the EMP as stipulated by Section 8 (e) of the EIA Regulations, primarily on specific approvals and permits that may be required for the activities required on the EPL. These are provided in Table 4-1.

Table 4-1: Legal and Regulatory Frameworks in terms of permits and licenses for the project activities.

Legislation/Policy/ Guideline	**Relevant Provisions**	**Implications for this project**
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts are subject to an environmental assessment process (Section 27). Details principles which are to guide all EAs.	The EMA and its regulations should inform and guide this EA process. Should the ECC be issued to the Proponent, it should be renewed every 3 years, counting from the date of issue. For ECC amendment or cancelation, the MEFT should be notified.
Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878)	Details requirements for public consultation within a given environmental assessment process (GN 30 S21). Details the requirements for what should be included in a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).	Contact details at the Department of Environmental Affairs and Forestry (DEAF), Ministry of Environment, Forestry and Tourism (MEFT), Office of the Environmental Commissioner: Mr. Timoteus Mufeti Tel: +264 61 284 2701

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	Section 48 (3): To enable the Minister to consider any application referred to in section 47 the Minister may (b) require the person concerned by notice in writing to (i) carry out or cause to be carried out such environmental impact studies as may be specified in the notice.	The Proponent should ensure that all necessary permits/authorizations, including the certificate for the EPL are obtained from the Ministry of Mines and Energy (MME). Contact person and details at the MME (Mining Commissioner): Mrs. Isabella Chirchir Tel: +264 61 284 8251.
	Section 52 (1) (a) requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder.	The Proponent should timely enter into and sign access and land use agreement (consent) with the land user (custodian) MEFT's Wildlife & National Parks and affected farmer prior to undertaking any activities on the EPL (including mobilization).
Water Resources Management Act (No 11 of 2013)	Ensure that the water resources of Namibia are managed, developed, used, conserved, and protected in a manner. Therefore, a Groundwater Abstraction & Use Permit should be applied for. The Permit is required for all commercial and industrial water uses. Although, exploration is not entirely commercial, the associated activities such as drilling fall under industrial activities, thus, the need to apply for an abstraction permit (this would apply if the Proponent abstracts water outside the EPL area)	The Water Permit should be applied from the Ministry of Agriculture, Water and Land Reform (MAWLR) Department of Water Affairs (DWA): Contact: Mr. Franciskus Witbooi Division: Water Policy and Water Law Administration Division Tel: +264 61 208 7158
	For any project wastewater planned for discharge into the environment, a discharge permit should be applied for and obtained.	MAWLR, DWA' Water Environment Division Contact: Ms. Elise Mbandeka Tel: +264 61 208 7167

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Nature Conservation Ordinance 4 of 1975	The conservation of nature in general and protection of endangered species	Adhere to the operational rules and regulation of the conservancy areas and ensure that consent is obtained from MEFT to carry out exploration. MEFT's Directorate of Wildlife & National Parks
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area"	The Proponent should obtain the necessary authorisation form the MME for the storage of fuel on-site (Consumer Installation Permit). Mr. Carlo Mcleod (Ministry of Mines and Energy: Acting Director – Petroleum Affairs) Tel: +264 61 284 8291
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	For any archaeological material, such as bones, unknown graves, old weapons/equipment etc. that may be found on the EPL, work should stop immediately, and the National Heritage Council (NHC) of Namibia must be informed as soon as possible. The Heritage Council will then decide to clear the area or decide to conserve the site or material. Contact Details at the NHC of Namibia: Mrs. Erica Ndalikokule – NHC Director Ms. Agnes Shiningayamwe (Heritage Officer) Tel: +264 61 301 903

5 ENVIRONMENTAL MONITORING PLAN

The project monitoring is conducted under the EMP and includes:

5.1.1 Project readiness monitoring

Monitoring to check progress on project readiness and close gaps through corrective actions.

5.1.2 Operational monitoring

This is required as part of the operations of the subproject and will be undertaken by the relevant government department or a nominated private sector operator.

5.1.3 Compliance Monitoring

During exploration activities, the company ECO will conduct site compliance inspections at least once a month. These inspections aim to identify any deviations, enforce corrective actions, and promote continuous environmental accountability throughout the project. After each inspection the ECO will compile an EMP compliance report for regular submission to the Exploration Manager and biannually to the MEFT or as required.

5.1.4 EMP and Environmental quality compliance monitoring

To be conducted by the appointed external Environmental Consultants to verify EMP compliance during project implementation. To be conducted by a competent authority or person appointed by the Proponent, involving the collection and analyses of air quality, noise and water quality data at designated monitoring locations for assessing compliance with applicable environmental quality and emission standards.

Environmental compliance monitoring will be conducted by appointed external Environmental Consultants to verify adherence to the EMP throughout the project implementation phase.

Monitoring will include the collection and analysis of environmental quality data, specifically air quality, noise levels, and water quality, at designated locations. This is to assess compliance with relevant national environmental standards and emission limits.

The monitoring activities shall be carried out by a competent authority or qualified person appointed by the Proponent. In addition to periodic field measurements, the consultants will provide documented assessments, highlight any non-compliance issues, and recommend corrective or mitigation measures where necessary.

Regular monitoring reports will be submitted to the relevant regulatory bodies, ensuring transparency and continuous environmental oversight throughout the life of the project.

6 CONCLUSION

The Environmental Management Plan (EMP) presented in this report outlines the proactive measures that will be implemented to effectively mitigate the potential environmental impacts of the proposed exploration and possible test mining operations within EPL-9250. The EMP details a comprehensive management strategy to address environmental concerns and ensure responsible and sustainable practices throughout the project's lifecycle.

By adhering to the Environmental Regulations of 2012 and the provisions set forth by the project proponent, the approach and methodology for the EIA will be rigorous and thorough.

The implementation of the EMP is essential to minimize negative effects on the environment while maximizing positive outcomes. It will focus on employing best practices, innovative technologies, and environmental safeguards to protect the natural surroundings and the well-being of local communities.

By following the EMP guidelines, the project aims to enhance the overall ecosystem services and value of the EPL-9250 and its vicinity. This means conserving and protecting biodiversity, water resources, and cultural heritage, while simultaneously contributing to sustainable economic development. Therefore, this EMP embodies the project Proponent's commitment to responsible and environmentally conscious practices. Through the implementation of the EMP and the rigorous EIA process, the project aims to strike a balance between exploration and environmental conservation, ensuring a harmonious coexistence between human activities and the natural environment.

APPENDIX A: CHANCE FINDS PROCEDURE

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

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

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

Responsibility:

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

Procedure:

Action by person identifying archaeological or heritage material

a) If operating machinery or equipment stop work

b) Identify the site with flag tape

c) Determine GPS position if possible

d) Report findings to foreman

Action by foreman

a) Report findings, site location and actions taken to superintendent

b) Cease any works in immediate vicinity

Action by superintendent

a) Visit site and determine whether work can proceed without damage to findings

b) Determine and mark exclusion boundary

c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by Archaeologist

a) Inspect site and confirm addition to project GIS

b) Advise NHC and request written permission to remove findings from work area

c) Recovery, packaging and labelling of findings for transfer to National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by archaeologist to confirm that remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.