



24 October 2025

MEMORANDUM

ENVIRONMENTAL MANAGEMENT PLAN

MEFT Application number: 241211005062

Proponent: Green Metals Refining Namibia (Pty) Ltd

Project: Manganese Refinery and Sulphuric Acid plant Project on Farm 58 east of Walvis Bay town

Document: Environmental Impact Assessment Scoping Report (Scoping Report)

MEFT: Ministry of Environment and, Forestry and Tourism

ASEC: A. Speiser Environmental Consultants (lead independent environmental consultants)

With reference to our letter dated 2 June 2025, please note that the EIA Scoping Process for the above-mentioned Project has been completed. The Final EIA Scoping Report, including all relevant Appendices, has been submitted (in hard copy format) to the MIME as the Competent Authority, and to the MEFT, Department of Environmental Affairs for review on the 3rd of June 2025.

As indicated in the abovementioned letter, the Impact Assessment Phase of the EIA process — including the relevant specialist studies and the preparation of the EIA Report and Environmental Management Plan (EMP) — is currently underway and will be completed following MEFT's review and decision on the Scoping Report.

Therefore, taking the above into consideration, the EIA Report and EMP still need to be developed.

Accordingly, an EMP could not yet be provided as part of the Scoping Report submission.

Please refer to Section 2.2.2 of the Scoping Report, where the following is stated regarding the development of an EMP:

SCOPING REPORT REQUIREMENTS IN TERMS OF THE EIA REGULATIONS	REFERENCE IN REPORT
(a) a draft management plan, which includes - (i) information on any proposed management, mitigation, protection or remedial measures to be undertaken to address the	The management and mitigation measures and

SCOPING REPORT REQUIREMENTS IN TERMS OF THE EIA REGULATIONS	REFERENCE IN REPORT
effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure; (ii) as far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and (iii) a description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation remedy the cause of pollution or degradation and migration of pollutants.	monitoring requirements will be developed as an outcome of the Impact Assessment phase. These will be included in the EMP, as part of the EIA Report. See Chapter 8 for further details.