

Environmental Management Plan (EMP)

The Proposed Exploration Activities on Exclusive Prospecting License (EPL) No. 10736, located Northwest of Opuwo in the Kunene Region, Namibia



ECC Application No.:

APP-005787

Proponent:

Naxos Investments (Pty) Ltd

P. O. Box 8912, Swakopmund, Namibia

December 2025

DOCUMENT INFORMATION

Title: Environmental Management Plan (EMP) for the Proposed Exploration Activities on Exclusive Prospecting License (EPL) No. 10736 located Northwest of Opuwo in the Kunene Region, Namibia

Prepared by:

Author:	Fredrika N. Shagama (Hydrogeologist & Environmental Consultant)
Qualifications:	PhD. Student: Civil Engineering (Geotechnics & Hydrogeology), VSB - Technical University of Ostrava, Czech Republic Post Graduate Diploma in Environmental Studies, International University of Management (IUM) MSc. Geological Engineering (<i>cum laude</i>) with primary focus in Hydrogeology, VSB - Technical University of Ostrava, Czech Republic BSc. Geological Engineering, VSB - Technical University of Ostrava, Czech Republic
Professional Affiliations:	Environmental Assessment Professionals of Namibia (EAPAN) - Practitioner (Membership No. 183); Geoscience Council of Namibia (GSCN) – Geoscientist, Registration No. GSCN/G-057; International Association of Hydrogeologists (IAH) - Full Member, Membership No.139790; Namibian Hydrogeological Association (NHA) – Member
Contact Details:	Mobile: +264 81 407 5536; P.O. Box 27318, Windhoek, Namibia
Signature:	
Date:	December 2025

SERJA'S STATEMENT OF INDEPENDENCE

As the Appointed Environmental Consultant to undertake the Environmental Scoping Assessment (ESA) Study and Preparation of this EMP for the proposed Exploration Activities on Exclusive Prospecting License (EPL) No. 10736 located Northwest of Opuwo in the Kunene Region, Namibia, Serja Hydrogeo-Environmental Consultants cc declare that we:

- do not have, to our knowledge, any information or relationship with Naxos Investments (Pty) Ltd (the Proponent), the Ministry of Environment, Forestry and Tourism (MEFT)'s Department of Environmental Affairs and Forestry (DEAF) or the Competent Authority (Ministry of Industries, Mines and Energy (MIME)) that may reasonably have potential of influencing the outcome of this Environmental Assessment and the subsequent Environmental Clearance Certificate applied for.
- have knowledge of and experience in conducting environmental assessments, the Environmental Management Act (EMA) No. 7 of 2007, and its 2012 Environmental Impact Assessment (EIA) Regulation, as well as other relevant national and international legislation, guidelines, policies, and standards that govern the proposed project as presented herein.
- have performed work related to the ECC application in an objective manner, even if the results in views and findings, or some of these may not be favourable to the Proponent.
- have complied with the EMA and other relevant regulations, guidelines, and other applicable laws as listed in this document.
- declare that we do not have and will not have any involvement or financial interest in the undertaking/implementation of the proposed project, other than remuneration (professional fees) for work performed to conduct the ESA and apply for the ECC in terms of the EIA Regulations' requirement as an Environmental Assessment Practitioner (EAP).

Disclaimer: Serja Hydrogeo-Environmental 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.



.....
Signature:

Fredrika N. Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Date: December 2025

TABLE OF CONTENTS

DOCUMENT INFORMATION	i
TABLE OF CONTENTS	iii
LIST OF FIGURES	iv
LIST OF TABLES	iv
LIST OF APPENDICES	iv
LIST OF ABBREVIATIONS.....	iv
1 INTRODUCTION.....	1
1.1 Project Background and Location	1
1.2 Purpose of the Draft Environmental Management Plan (EMP)	3
2 BRIEF DESCRIPTION OF THE PROPOSED PROJECT ACTIVITIES.....	3
2.1 Duration of the Proposed Prospecting and Exploration Works.....	4
2.2 Planned Exploration Methods	4
2.3 Project Resources and Services Infrastructure.....	5
2.3.1 Human resources	5
2.3.2 Project Crew Accommodation	5
2.3.3 Project Equipment, Material, Machinery, and Vehicles.....	5
2.3.4 Water Supply	5
2.3.5 Fuel supply (For Cooking)	6
2.3.6 Fuel Supply (Machinery and Equipment)	6
2.3.7 Accessibility (roads)	6
2.3.8 Waste management	6
2.3.9 Health and Safety	6
2.4 Decommissioning and Rehabilitation of Disturbed Sites	7
3 LEGAL FRAMEWORK: PERMITTING AND LICENSES	8
4 EMP IMPLEMENTATION RESPONSIBILITIES	10
5 ENVIRONMENTAL MANAGEMENT MEASURES	11
5.1 Key identified Potential negative Impacts	12
5.2 Cumulative Impacts Associated with the Proposed Project.....	13
5.3 Environmental Management Measures and Rehabilitation of Sites	13
5.4 Environmental Monitoring Actions.....	33
6 GRIEVANCE REDRESSAL MECHANISM (GRM) (ADOPTED FROM SOLNAM ENERGY SUPPLEMENTARY ESIA BY PALLETT AND SHAGAMA, 2024).....	40
6.1 Objectives of the Grievance Mechanism	40
6.2 Proposed Grievance Procedures	40
6.2.1 Categorization of Stakeholder (Interested & Affected Party (I&AP))	40

6.2.2	Categorization of Grievances	41
6.2.3	Grievances Submission and Recording	43
6.2.4	Monitoring of the Grievance Mechanism	44
6.2.5	Management of Information	45

LIST OF FIGURES

Figure 1-1: The status of EPL-10736 on the Namibia Mining Cadastre Map Portal (https://portal.mme.gov.na/page/MapPublic)	1
Figure 1-2: Locality map of the EPL-10736, 85km west of Okangwati in the Kunene Region	2
Figure 1-3: Locality map with the significant land use (communal conservancies) overlain by EPL-10736	2

LIST OF TABLES

Table 3-1: List of legal requirements and permits for the activities of the EPL	8
Table 4-1: The EMP implementation responsibilities for prospecting and exploration	10
Table 5-1: The Environmental management and mitigation measures for Planning, as well as Prospecting and Exploration activities	14
Table 5-2: The Mitigation measures for site rehabilitation	32
Table 5-3: Monitoring of Biophysical and Social Aspects referred to in the assessment (modified after Resilient Environmental Solutions, 2019)	34
Table 6-1: Types (categories) of grievances	41

LIST OF APPENDICES

Appendix 1: Chance Finds Procedure (Archaeology & Heritage Action Plan)
--

LIST OF ABBREVIATIONS

CLO:	Community Liaison Officer
DEAF:	Department of Environmental Affairs and Forestry
DWA:	Department of Water Affairs
ECC:	Environmental Clearance Certificate
ECO:	Environmental Control Officer
EIA:	Environmental Impact Assessment
EMA:	Environmental Management Act
EMP:	Environmental Management Plan
EPL:	Exclusive Prospecting License
ESA:	Environmental Scoping Assessment

GG, GN:	Government Gazette and Government Notice
GRM:	Grievance Redressal Mechanism
I&APs:	Interested and Affected Parties
MAFWLR:	Ministry of Agriculture, Fisheries, Water, and Land Reform
MEFT:	Ministry of Environment, Forestry and Tourism
MIME:	Ministry of Industries, Mines and Energy
NHC:	National Heritage Council
PPE:	Personal Protective Equipment
SHE Officer:	Safety, Health & Environment Officer

1 INTRODUCTION

1.1 Project Background and Location

Naxos Investments (Pty) Ltd (hereinafter referred to as the Proponent) has applied to the Ministry of Industries, Mines and Energy (MIME) on the 1st of April 2025 for the rights to prospect and explore on the Exclusive Prospecting Licence (EPL) No. 10736 as per the “application” status on the Namibia MME Portal <https://portal.mme.gov.na/page/MapPublic> - Figure 1-1. However, the approval of the EPL application and subsequent prospecting and exploration activities are subject to an Environmental Clearance Certificate (ECC).

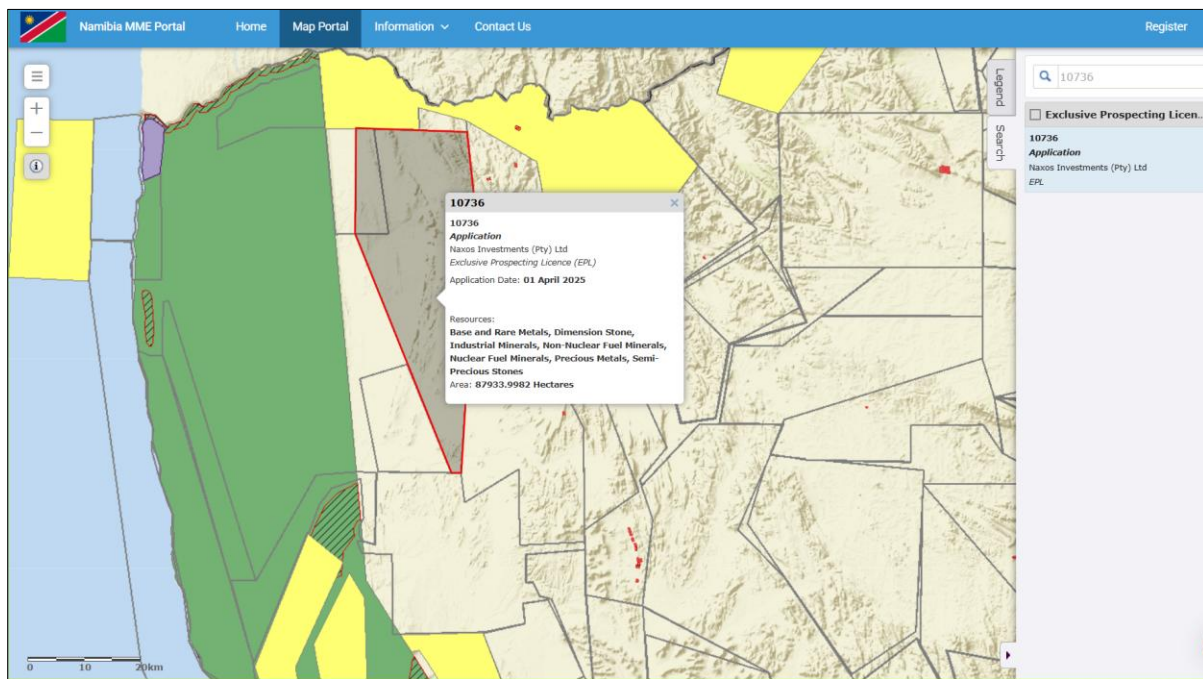
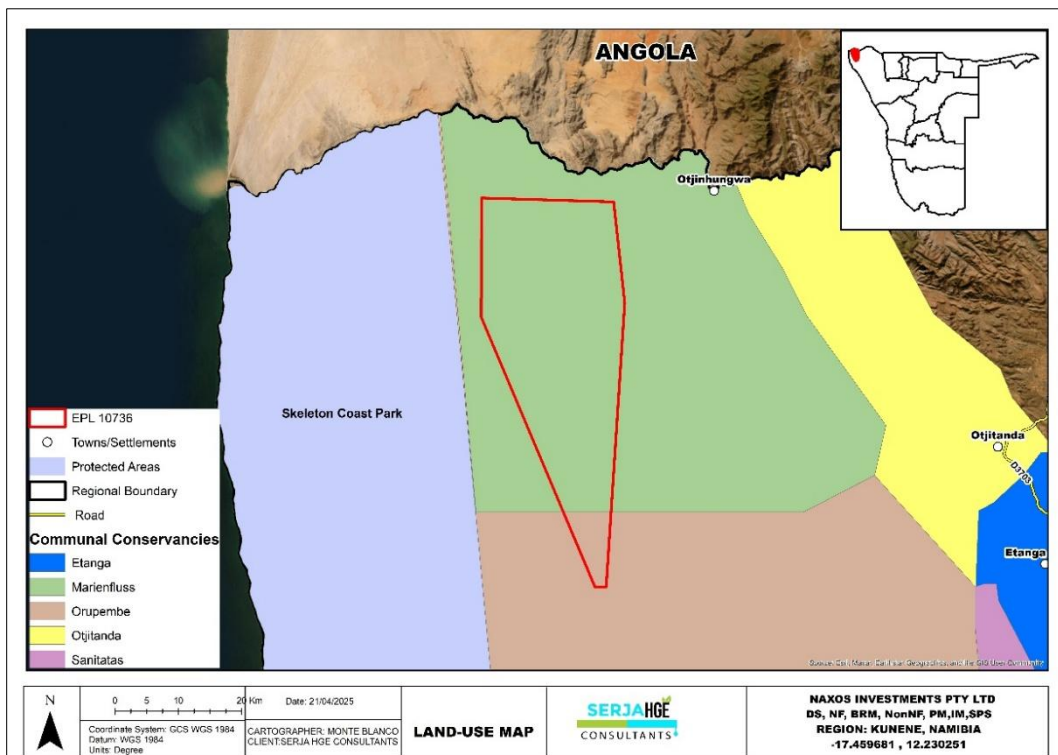
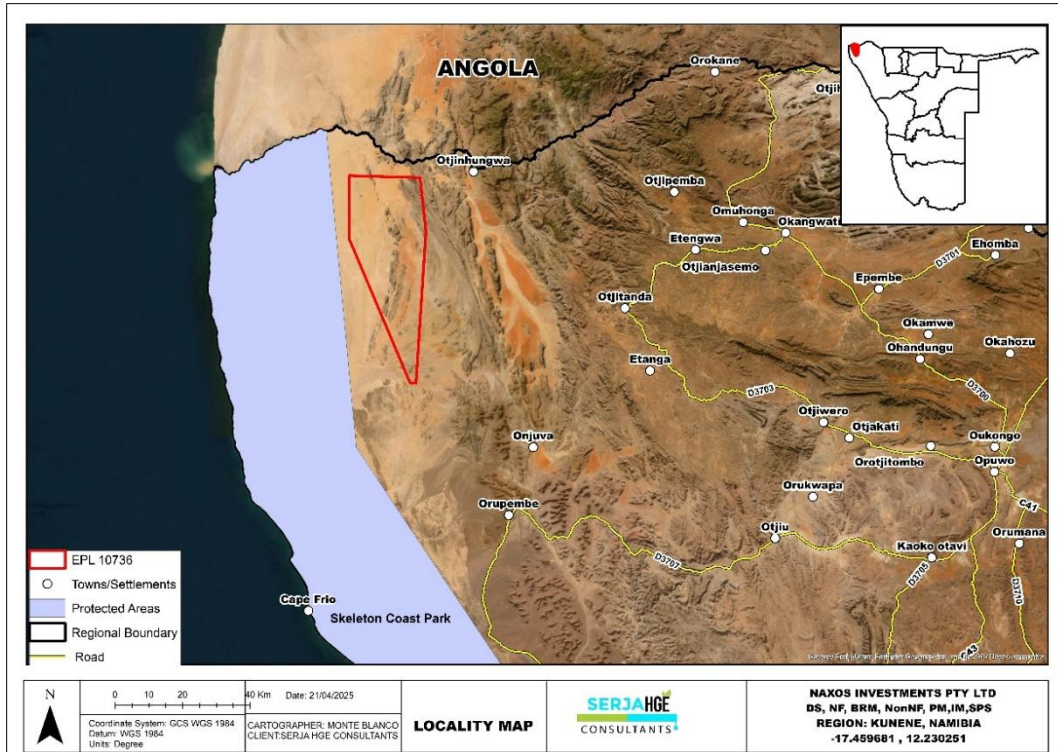


Figure 1-1: The status of EPL-10736 on the Namibia Mining Cadastre Map Portal (<https://portal.mme.gov.na/page/MapPublic>)

The EPL has potential for seven mineral commodities, namely Base & Rare Metals, Dimension Stone, Industrial Minerals, Non-Nuclear Fuel Minerals, Nuclear Fuel Minerals, Precious Metals, and Semi-Precious Stones. Thus, upon granting of the EPL rights by the MIME, the Proponent intends to prospect and explore within the boundaries of EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region - Figure 1-2. Moreover, the EPL mainly overlies the Marienfluss Communal Conservancy and partly the Orupembe Conservancy – see the land use map in Figure 1-3.



1.2 Purpose of the Draft Environmental Management Plan (EMP)

The Draft EMP was developed following Regulation 8(j) of the EIA Regulations (2012), which states that it should be included as part of the Environmental Assessment (EA) scoping report. A '**Management Plan**' is defined as:

"...a plan that describes how activities that may have significant environmental effects on the environment are to be mitigated, controlled, and monitored."

An EMP is one of the most important outputs of the EA process as it synthesizes all the proposed management & mitigation, and monitoring actions, set to a timeline and with specific assigned responsibilities. It provides a link between the impacts identified in the EA process and the required mitigation measures to be implemented during exploration. It is important to note that an EMP is a statutory document, and a person who contravenes the provisions of this EMP may face imprisonment and/or a fine. This EMP is a living document and can be amended to adapt to address project changes and/or environmental conditions and feedback from compliance monitoring.

The EMP is therefore aimed at guiding environmental management throughout the different phases of the proposed exploration activities, namely: planning, prospecting & exploration, and decommissioning & rehabilitation phase:

- **Planning phase** – Preparation of all the administrative and technical requirements needed for the actual works on the ground. The planning would entail obtaining the necessary permitting and authorization from relevant national and local stakeholders (such as affected land custodians/users), facilitating the recruitment and procurement processes, etc.
- **Exploration phase** – The stage during which actual groundwork (prospecting and exploration activities) and associated activities are conducted within the EPL.
- **Decommissioning and Rehabilitation** – The stage during which the Proponent is rehabilitating the disturbed sites, regardless of the results of exploration activities.

2 BRIEF DESCRIPTION OF THE PROPOSED PROJECT ACTIVITIES

It should be noted that this EIA Study is for exploration activities only and not mining because mining cannot be done on an EPL. A mining license would need to be applied for after exploration (if found to be economically feasible), of which another EIA study would be conducted to apply for a mining license, i.e., to convert the EPL into a mining license.

Before undertaking the proposed activities on the EPL, the Proponent will be required to obtain consent and sign land use agreements with the Traditional Authority of the area and the management of the two conservancies (i.e., mainly over Marienfluss and partly over Orupembe). However, after thorough consultation with the Conservancies, there will be exploration activities carried out within the Orupembe Conservancy due to its high sensitivity compared to other conservancies in the area.

The anticipated duration of the proposed prospecting and exploration activities is between six (6) and twenty-four (24) months. However, should the anticipated timeframe prove insufficient or, depending on the exploration findings, extend beyond 24 months, this may be communicated to the relevant stakeholders for further consideration.

2.1 Duration of the Proposed Prospecting and Exploration Works

The exploration programs are based on an iterative, results-driven, and phased nature. Therefore, it is not possible at an early stage of exploration to give exact areas for future drilling or an exact duration of the exploration activities (Resilient Environmental Solutions, 2019). Drone surveys, ground geophysical surveys, and soil sampling programs, for instance, may last from one week to a month at a time over specific areas until the exploration targets are delineated. Drilling programs may initially range from two weeks to a month at a time, depending on the planned program or based on the results of the program. The Proponent undertakes to work with all relevant stakeholders to keep them informed of the exploration progress, facilitating site visits and access to ongoing field exploration programs.

In general terms, the minerals exploration activities can take up to a maximum of seven years, with different projects at various stages of the exploration phase (Resilient Environmental Solutions, 2019).

The Proponent intends to adopt a systematic and standard prospecting and exploration approach for the commodities of interest (Base & Rare Metals, Dimension Stone, Industrial Minerals, Non-Nuclear Fuel Minerals, Nuclear Fuel Minerals, Precious Metals, and Semi-Precious Stones) potentially occurring on the EPL. The exploration methods are presented in the ESA Report, but are also summarized below.

2.2 Planned Exploration Methods

The proposed activities will be done using both non-invasive and invasive techniques, as summarized below and detailed under Chapter 2 of the ESA Report:

- Desktop Study (non-invasive): Geophysical surveys, geological mapping, review of existing geological maps, and historical drilling/quarrying data.
- Soil and rock sampling (invasive): Regional soil and rock sampling programs.
- Detailed exploration (invasive): Trenching and drilling (Reverse Circulation (RC) and diamond drilling (DD)).

2.3 Project Resources and Services Infrastructure

The following services and infrastructure, as provided below, will be required for the project activities.

2.3.1 Human resources

The exploration crew will consist of a minimum of seven people, comprising one to two skilled, two to three semi-skilled, and four casual workers. However, this number may vary depending on the stages of the exploration activities. For instance, fewer people would be required for soil sampling and trenching compared to drilling workforce requirements.

2.3.2 Project Crew Accommodation

Exploration (mainly drilling) workers will be housed in nearby villages and surrounding communities – hence, it is recommended to employ as many locals as possible for the work they can do. This is to minimize the number of outsiders who may need accommodation. Out-of-area workers with specialized skills for exploration would be accommodated in an exploration camp to be set up in the area, particularly for the trenching and drilling phases.

2.3.3 Project Equipment, Material, Machinery, and Vehicles

The following equipment and machinery will be required for the exploration stage:

- A minimum of two (4X4) pickup trucks (vehicles), and a heavy truck,
- Air compressor,
- Drill rigs and drilling machines,
- Two-way radios (for communication),
- Water supply tanks with dispersion pipelines, and a fuel bowser,
- Power generators (minimum two),
- Down-The-Hole (DTH) drilling rig (for Dimension Stone exploration), and
- Biodegradable drilling fluids stored in manufacturer-approved containers.

Equipment and vehicles will be stored at a designated area near the accommodation site (campsite) or a storage site established within the EPL site area.

2.3.4 Water Supply

The required water will be used for actual detailed exploration activities, such as drilling, cooling down, and washing of drilling equipment, as well as domestic use (drinking). It is anticipated that water for drilling activities will be tanked to the site from Okangwati (upon reaching a water supply agreement with the Settlement Council). Alternatively, water for exploration activities can be sourced from the Kunene River, upon obtaining an abstraction permit from the Water Affairs Department. Water for drinking will be purchased from shops in Okangwati, or arrangements can be made with the Okangwati Settlement to provide potable water for the exploration workforce in the field.

Furthermore, due to the remoteness of the project site, it may be necessary to drill a borehole for water for exploration uses, as water bowssing/transport might be untenable.

2.3.5 Fuel supply (For Cooking)

The Proponent will provide firewood or fuel to be used for food preparation by the site workers. No firewood will be collected onsite or on neighbouring communal land.

2.3.6 Fuel Supply (Machinery and Equipment)

Diesel will be used for machinery and equipment, and a fuel generator. A trailer-mounted and bunded fuel tank of about 10,000 litres will be on-site to ensure an uninterrupted fuel supply to the project.

2.3.7 Accessibility (roads)

The nearest proclaimed road to the EPL is D3703 on the eastern side of the EPL. Therefore, the access route to the EPL will use D3703 and a newly developed access road to reach the EPL site. The Traditional Authority and Conservancy management will be consulted and consent acquired for the development of any new roads or tracks.

2.3.8 Waste management

The onsite waste types will be managed as follows:

- Sewage: Two portable ablution facilities with septic tanks will be provided on site and emptied according to manufacturers' instructions. The following options will be considered based on the site conditions at the time of exploration activities:
 - 1) If the exploration camp is near an existing community, then the facilities could 'tap' into whatever type of French drain system is used in the community. The Proponent will ensure the maintenance of these sewage facilities, not only for the project personnel, but also for the community. However, consent will be obtained from the local community leader(s) before the project can establish and or use community sewage infrastructure.
 - 2) The project will use temporary septic tanks to manage sewage at the exploration campsite.
 - 3) Alternatively, and more practicable or feasible, is the construction of a French drain and the application of a discharge permit. The French drain will not be constructed along a watercourse or within 100m of any watercourse (active stream) in accordance with the Water Resources Management Regulations (2023).
- General and domestic waste: Solid waste containers will be made available at both exploration sites and the campsite for waste storage, sorting, and later disposal at the Opuwo dumpsite.
- Hazardous waste: All vehicles, machinery, and fuel-consuming equipment will be provided with drip trays to capture potential fuel spills and waste oils. The waste fuel/oils will be carefully stored in a standardized container to be disposed of at the nearest approved hazardous waste management facility in Windhoek.

2.3.9 Health and Safety

The following measures will be implemented onsite to ensure safety and security:

- Adequate and appropriate Personal Protective Equipment (PPE) will be provided to all project personnel while on and working at the site, including site visitors.
- First aid: A minimum of two first aid kits will be readily available at exploration and camp sites to attend to potential minor injuries, while major injuries will need to be attended to further by transporting the injured to the nearest health centre for treatment. At least 2 personnel will be trained to administer first aid.
- Potential Accidental Fire Outbreaks: As a control measure for accidental fire outbreaks, basic firefighting equipment, i.e., well-serviced fire extinguishers, will be readily available in every exploration vehicle, at the working sites, and at the project campsite (accommodation units). The site personnel will be trained in and provided with firefighting skills.
- Open exploration trenches and boreholes: The trenches dug for sampling will be temporarily fenced off to prevent potential injuries to wildlife and livestock in the area. Once sampling is completed, the trenches will be progressively backfilled and levelled, and fencing will be removed for storage or donation to the land custodians for the communities. Similarly, for exploration boreholes that are no longer required after rock samples, they will be backfilled and closed off.
Warning signage at hazardous site areas, such as open trenches, will be erected.

2.4 Decommissioning and Rehabilitation of Disturbed Sites

Once the exploration activities on the EPL are completed, the Proponent will need to put site rehabilitation measures in place. To ensure the project activities are ceased in an environmentally friendly manner and the site is rehabilitated by carrying out the following:

- Dismantling and removal of campsites and associated infrastructures from the project site and area,
- Carrying away all exploration equipment and vehicles, and
- Clean up of site working areas and transporting the recently generated waste to the nearby approved waste management facility (as per agreement with the facility operator/owner),

Further decommissioning and rehabilitation practice onsite will include:

- Backfilling of pits and trenches used for sampling,
- Closing and capping of exploration boreholes to ensure that they do not pose a risk to both people and animals in the area, and
- Levelling of stockpiled topsoil. This will be done to ensure that the disturbed land sites are left as close to their original state as possible.

3 LEGAL FRAMEWORK: PERMITTING AND LICENSES

The Proponent has the responsibility to ensure that the exploration activities, as well as the EA process, conform to the principles of the EMA and must ensure that employees act in accordance with such principles. Table 3-1 below lists the requirements of an 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 of the EPL.

Table 3-1: List of legal requirements and permits for the activities of the EPL

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
Environmental Management Act EMA (No 7 of 2007)	Requires that projects with significant environmental impacts be subject to an environmental assessment process (Section 27). Details the principles that 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. 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
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).	Mr. Timoteus Mufeti Tel: +264 61 284 2701
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/authorization for these EPL are obtained from the Ministry of Industries, Mines and Energy (MME). Contact person and details at the MIME (Mining Commissioner) Mrs. Isabella Chirchir Tel: +264 61 284 8251.
Nature Conservation Amendment Act, No. 3 of 2017	The management of protected areas, to conserve biodiversity, should be promoted. Thus, consent to undertake exploration activities should be obtained from the management of the conservation areas.	The EPL is within the Marienfluss and slightly in the Orupembe Conservancies. Therefore, they should be engaged before and throughout the project implementation. However, after thorough consultation with the Conservancies, there will be exploration activities carried out within the Orupembe Conservancy.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
The Parks and Wildlife Management Bill of 2008		The consents should be obtained from the Conservancy management, and land use agreements should be entered into before exploration activities start. Agreements and conditions set by the conservancy management should be compiled throughout the project cycle.
Traditional Authority Act (Act No. 25 of 2000):	The Traditional Authorities should be involved in the planning of land use and development for their area.	The affected communal land falls under the area of the Traditional Authority. Therefore, the Traditional Authority (TA) should be consulted throughout the project.
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 that is. Therefore, a Groundwater Abstraction & Use Permit should be applied for. A 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, a need to apply for an abstraction permit.	The Water Permit should be applied for from the Ministry of Agriculture, Fisheries, Water, and Land Reform (MAFWLR) 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.	MAFWLR, DWA's Water Environment Division Contact: Ms. Elise Mbandeka Tel: +264 61 208 7167
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 from the MIME 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
Forestry Act (Act No. 12 of 2001)	The Act provides for the management and use of forests and forest products.	The Proponent will apply for the relevant permit under this Act if it becomes necessary to remove protected trees, such as the protected Mopane (<i>Colophospermum mopane</i>) and camelthorn trees.

Legislation/Policy/ Guideline	Relevant Provisions	Implications for this project
		Contact the MEFT's Forestry Directorate Office in the Kunene Region through the Head Office in Windhoek. Mr. Johnson Ndokosho: Director: Forestry Tel: +264 61 208 7666
National Heritage Act No. 76 of 1969	Call for the protection and conservation of heritage resources and artefacts.	Should any archaeological material, such as bones, unknown graves, old weapons/equipment, etc, be found on the EPL site, 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 National Heritage Council (NHC) of Namibia Mrs. Erica Ndalikokule – NHC Director Tel: +264 61 301 903

4 EMP IMPLEMENTATION RESPONSIBILITIES

Naxos Investments (Pty) Ltd (the Proponent) and its exploration partners (if any) are ultimately responsible for the implementation of the EMP. However, the Proponent may delegate this responsibility or part of it to someone else at any time, as they deem necessary. The roles and responsibilities of all delegates/parties involved in the effective implementation of this EMP are presented in Table 4-1.

Table 4-1: The EMP implementation responsibilities for prospecting and exploration

Role	Responsibilities
Naxos Investments (Pty) Ltd (Proponent) with Exploration Partners and or their Representative	-Managing the implementation of this EMP and updating and maintaining it when necessary. -Management and monitoring of individuals and/ or equipment on-site in terms of compliance with this EMP and issuing fines for contravening EMP provisions.
Exploration Manager	This individual will be responsible for ensuring that the exploration activities of the project are completed on time. The Manager's duties and responsibilities will include: -Ensure that relevant commitments contained in the EMP are adhered to.

Role	Responsibilities
	-Ensure relevant staff are trained in procedures entailed in their duties. -Maintain records of all relevant environmental documentation for the project. -Reviewing the EMP annually and amending the document when necessary. -Issuing fines to individuals who may be in breach of the EMP provision and, if necessary, removing such individuals from the site. -Cooperate with all relevant interested and affected parties/stakeholders. -Development and management of schedules for daily activities
Environmental Control Officer (ECO) / Safety, Health & Environment (SHE) Officer	The Proponent may assign the responsibility of ensuring EMP compliance throughout the project life cycle to a designated member of staff or an external qualified and experienced person, referred to in this EMP as the Environmental Control Officer (ECO) / SHE Officer. The ECO will have the following responsibilities: -Management and facilitation of communication between the Proponent, PR, and Interested and Affected Parties (I&APs) regarding this EMP. -Conducting site inspections of all areas concerning the implementation of this EMP (monitor and audit the implementation of the EMP). -Advising the Proponent or Exploration Manager on the removal of person(s) and/or equipment not complying with the provisions of this EMP. -Making recommendations to the PR for the issuing of fines for contraventions of the EMP. -Undertaking an annual review of the EMP and recommending additions and/or changes to this document.
Public Relations Officer (PRO) or Community Liaison Officer (CLO)	The PRO/CLO will be responsible for the following tasks: -Liaising between the stakeholders, the public, and the Proponent. -Ensure effective communication with stakeholders, media (if necessary), and the public. -Organising and overseeing public relations activities, managing public relations issues. -Preparing and submitting public relations reports, if required. -Collaborating with personnel and maintaining project-related open communication among personnel.

5 ENVIRONMENTAL MANAGEMENT MEASURES

5.1 Key identified Potential negative Impacts

The key potential negative impacts identified, described, and assessed in the Environmental Scoping Assessment Report, for which the management measures (action plans) have been provided, are listed below:

Positive impacts:

- Local socio-economic development through temporary employment creation.
- Procurement of local goods and services for exploration by small and medium businesses to promote local entrepreneurship, empowerment, and local economic development.
- Local socio-economic development through temporary employment creation for locals
- Payment of land use fees to the land custodians (and land users/conservancy) and traditional authority to uplift the local communities within or in proximity of the EPL, where possible.

Negative (adverse) impacts:

- Physical land/soil disturbance.
- Impact on local biodiversity (fauna and flora), and habitat disturbance.
- The potential impact of illegal hunting/poaching of wildlife in the area, with the EPL in conservation areas (communal conservancies).
- Potential impact on water resources and soils (over-abstraction and pollution)
- Impact on air quality due to dust generation (compromises the surrounding air quality)
- Visual impacts due to unrehabilitated exploration sites (e.g., from trenching and drilling activities)
- Potential occupational and community health and safety risks (open trenches and drilled holes may pose a risk to people), and to wildlife (animals) in the area
- Potential conflicts over land use between current activities in the area and exploration activities
- Noise associated with exploration drilling and the movement of heavy trucks to the site
- Vehicular traffic safety & impact on local roads
- Environmental pollution (littering) through improper handling, storage, and disposal of waste
- Impact on archaeological & cultural heritage resources.

5.2 Cumulative Impacts Associated with the Proposed Project

The following cumulative impacts have been identified as associated with the proposed exploration activities. These have been described and assessed in the Scoping Report. The measures to manage and mitigate these impacts are similar to the measures recommended for the project's impacts under section 5.1 above. Moreover, the mitigation of cumulative impacts would need a collective approach between all project proponents (project owners and developers) and local/regional key stakeholders (conservancies, traditional authorities, and communities) in the area and the Region at large for a much better outcome.

- Land and Soil Disturbance
- Poaching (illegal hunting of wildlife):
- Impact on road infrastructure
- Water Resources
- Biodiversity and Habitat
- Archaeological and Cultural Heritage
- Visual and Landscape Impacts
- Socio-Economic and Land Use Conflicts
- Cumulative Regional Development Pressure.

5.3 Environmental Management Measures and Rehabilitation of Sites

The management actions are aimed at avoiding the above-listed potential negative impacts as well as cumulative impacts, where possible. Where it is impossible to avoid these impacts, measures are provided to reduce the significance of these impacts. The Management action plans (mitigation measures) recommended for the potential impacts rated in the ESA Study were based on the following project stages (phases), as well as cumulative impacts:

- Planning, Prospecting, and Exploration phases (Table 5-1).
- Site Rehabilitation and Decommissioning (
- Table 5-2), and
- Biophysical and Social Environmental Monitoring (Table 5-3).

Table 5-1: The Environmental management and mitigation measures for Planning, as well as Prospecting and Exploration activities

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Planning Phase					
EMP implementation and training	Lack of EMP awareness and implications thereof	-A Comprehensive Health and Safety Plan for the project activities should be compiled. -An EMP non-compliance penalty system should be implemented on-site. -The Proponent should appoint an Environmental Control Officer (ECO) or SHE Officer to be responsible for managing the EMP implementation and monitoring.	-All required EMP implementation Plans and Systems are compiled and in place. -ECO is appointed	-Proponent	Pre-exploration
Authorizations	Lack of Agreements, Permits/ Licenses	-All the required agreements and licenses or permits should be applied for and signed, respectively, before commencement of work on the EPL, or as required. -No exploration activities are to be conducted within the Orupembe Conservancy. Thus, no consent was given to it. -The permits and agreements referred to herein include: (a) Land use agreement through Memoranda of Agreement (MoA) with the Traditional Authority and Marienfluss Conservancy. (b) Waste management disposal permits from the relevant facility operator/owner (c) Water supply agreements or groundwater abstraction & use permit (if abstracting directly from a borehole, river, or dam) (d) Fuel storage permit from MIME for petroleum stored onsite.	-Applicable permits and licenses to be obtained from relevant authorities. -The Memoranda of Agreements between the Traditional Authority and Conservancies are in place	-Proponent	Pre-exploration
Communication between the Proponent and land custodians/users, as well as communities	Lack of communication between land custodians/users, the Proponent, and the communities	-The Proponent should appoint a Public Relations Officer (PRO)/Community Liaison Officer (CLO), preferably someone from the community, to maintain dialogue with communities as well as liaise between the Proponent and communities throughout the exploration period. -A clear communication procedure/plan, which should include a grievance mechanism, should be developed using the	-A PRO/CLO is appointed -PRO contact details provided to land custodians -The GRM is in place	-Proponent	PRO appointment (Before project activities) and their responsibilities throughout the project activities

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
	concerning the project	generic Grievance Redressal Mechanism (GRM) under Chapter 6 of this EMP.	-There is a Complaint's logbook		
Planning a community meeting	Lack of communication and transparency	-Feedback (planning) meeting should be held with the communities as part of the project planning phase so that the communities, their leaders (and other local key stakeholders), and the Proponent. This is for the parties to engage and plan for the commencement of activities and agree on the conditions of operations together after the ECC and EPL certificates are issued. -An emphasis on the above point, the Proponent should commit to holding a feedback meeting with the communities once the ECC is granted (and share key conditions of the ECC and plans). This should be done before any exploration commences on the ground -The proponent should meet with the local Traditional Authority and Conservancies to outline the work program and timing.	-The meeting is held, and all pre-project activities matters are addressed transparently and amicably. -Ongoing Consultation throughout the project, when and as required.	-Proponent -Exploration Manager	A feedback (planning) meeting is to be held before the project activities. Reporting meetings and or engagements to be held throughout the project cycle as deemed necessary
Employment	Creation of employment opportunities	-Where possible, source the unskilled and semi-skilled labour for casual work (watchmen, guides, or labourers) from the local communities (villages) within or near the EPL. Out-of-area employment should be justified, for example, by the unavailability of local skills. -Contractors should give all unskilled and semi-skilled work to the locals before considering outsiders. This is to avoid the influx of outsiders into the area for work that can be done by the locals. -The anticipated work opportunities and number of positions should be announced through the local leadership offices (Epupa Constituency and Traditional Authority (TA)). -The names of the prospective workers should be screened by the local leaders to verify their place of origin to ensure that	-Number of locals employed for exploration activities	-Proponent in collaboration with the Drilling contractors	Pre-exploration and, when necessary, throughout

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		the opportunities reserved for the locals are not given to outsiders. -Where possible, the locals (such as graduates and youth) employed during exploration should be provided with the necessary training of skills required to avoid bringing in many out-of-area workers.			
Land use fees for socio-economic development Corporate Social/Community Responsibility	Local socio-economic development	-Commit to the conditions listed in the Memorandum of Agreements (MoA) signed with authorities such as the Traditional Authority and Marienfluss Conservancy -Any payments of land use fees should be made as agreed. -Where possible, commit to community development projects or contributions such as donations to conservancies or assist with water infrastructure as goodwill. Therefore, this should be discussed with the community to align with local needs. Ensuring benefits, though modest at the exploration stage, helps offset the community's tolerance for the disturbance and sets a tone of partnership.	-Proof of funds paid to the respective authorities' bank account and related records.	-Proponent -Exploration Manager	Pre-exploration and, when necessary, throughout
Specialised procurement of services and goods	Empowerment of local businesses	-All services related to exploration activities, such as trenching, site establishment, and drilling that the Proponent may need, preference, and available, locally and regionally, priority should be given to local and regional businesses for such services and goods.	-Number of hired contractors. -Record of hired or contracted companies or service providers	-Proponent -Exploration Manager	Pre-exploration
Presence of the exploration crew in the area	Combating/fighting anti-poaching	-Commit to assisting the Conservancies in fighting against poaching (crime against wildlife) while in the area by creating awareness among the project workers and the impact of such crimes on the host environment and the country at large. -Report any suspicious activities related to wildlife crime to the Conservancy and the nearest Police.	-Proof of assistance rendered to Conservancies in combating poaching in the area.	-Proponent -Exploration Manager	Pre-exploration and throughout the project phases

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Assist the Conservancy and, if needed, the wildlife rangers in the area with basic needs to use when in the field, where possible.			
Prospecting and Exploration Phase					
EMP implementation and training	Lack of EMP awareness and implications thereof	-EMP trainings should be provided to all workers on-site. -All site personnel should be aware of the necessary health, safety, and environmental considerations applicable to their respective work. -The implementation of this EMP should be monitored. The site should be inspected, and a compliance audit should be done throughout <u>the project activities, monthly, and biannually for overall EMP implementation.</u> -EMP non-compliance penalty system should be implemented.	-Records of EMP compliance/monitoring conducted biannually -The ECC is renewed every 3 years -Records of EMP training conducted.	-Exploration Manager -ECO	Throughout the exploration phase
Communication between the Proponent and land custodians/users	Lack of communication (proper liaison) between land custodians and the Proponent on land use	-The PRO should be introduced to the stakeholders, and their contact details should be provided to them before undertaking activities for easy communication. -The Proponent should compile a clear communication procedure/plan, which should include a grievance and response mechanism.	-PRO is part of the project personnel. -Records of stakeholders' continued consultation -Public grievances addressed to their satisfaction -Complaint's logbook	-PRO	Throughout exploration
Cumulative Impact Management and Inter-Project Coordination	Communication and engagement between the Proponent and communities: Lack of proper engagement and timely information sharing	-Collaborate with any other active EPL projects in the area on schedules, share mitigation measures where feasible, and combine monitoring efforts. This would be an innovative and proactive step, setting a positive precedent for responsible exploration in communal areas. -Scheduling exploration activities so that not all EPLs conduct invasive activities at once. This is to allow wildlife some respite in between.	-Exploration programs are designed with consideration for wildlife in the area. -There are visible and proven joint efforts of collaboration, shared mitigation measures, and	-Proponent -Exploration Manager -ECO	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Collaborate on a joint wildlife monitoring program, sharing data on sightings or incidents, to better understand regional wildlife impacts rather than piecemeal data.	environmental monitoring efforts that are combined.		
Land Use and distance from closest villages/settlements	Exploration activities in proximity to human settlements (homes)	-Exploration activities should only be conducted at least 1.5km from villages, settlements, tourism camps, and homes/homesteads, i.e., a 1.5km buffer zone from human settlements should be maintained.	-No prospecting and exploration works within 1.5km of community homesteads or villages -The 1.5km is implemented	-Exploration Manager	Throughout the exploration phase
Water Resources Use	Over-abstraction (water demand and availability)	-Water should be used efficiently, and recycling and reusing of water for certain site activities should be encouraged. -Consider carting water for drilling from elsewhere outside the site area to not put pressure on the available resources. Agreements for water supply should be made between the willing water supplier and the Proponent. -If the carted water is directly abstracted from a certain borehole or boreholes outside the EPL, the Proponent should apply for a Groundwater Abstraction & Use License from the DWA of MAFWLR. -Water reuse/recycling methods should be implemented as far as practicable, such that the water used to cool off exploration equipment should be captured and used for the cleaning of project equipment, where possible. -Water storage tanks should be inspected daily to ensure that there is no leakage, resulting in wasted water on site. -Water conservation awareness and saving measures training should be provided to all the project workers to understand the importance of conserving water and become accountable. -Should it be clear after reconnaissance survey and RC drilling that some water will be sourced from local aquifers (boreholes), a Baseline hydrogeological assessment should be conducted to assess the water availability for the project and host environment. This should include water levels,	-Water supply agreements -Proof/ recording/ quantification of water saving efforts. -Water supplying agreements -Water storage tanks on site -All the necessary water supply permits/licenses are issued for utilization	-Proponent -Exploration Manager -ECO	Once-off supply agreements/licenses that are renewed as required The rest of the measures should be implemented throughout the exploration phase.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		quality samples, and current water uses. This will trigger an application for groundwater abstraction (which would start with a borehole drilling permit from the MAFWLR and be followed by the Groundwater Abstraction & Use License to abstract and use the water). -Should new water boreholes be drilled for the project, the boreholes should be registered with the Geohydrology Division of the MAFWLR, and ensure adherence to drilling standards. -Similarly, should it be clear after reconnaissance survey and RC drilling that some water will be sourced from a local surface water body (river), this will trigger an application for water resources abstraction and use from the MAFWLR before utilization.			
Soils	Physical soil/land disturbance and loss of topsoil	-Stockpiled topsoil and drill materials should be used to backfill the excavated and disturbed site areas/spots. -The topsoil that was stripped from certain site areas to enable project works and can be returned to its initial position should be returned. This is to avoid unnecessary stockpiling of site soils, which would leave them prone to erosion. -Soils that are not within the intended footprints of the site target areas should be left undisturbed, and soil conservation implemented as far as possible. -Project vehicles/machinery should stick to access roads provided and not unnecessarily create further tracks on and around the site by driving everywhere, resulting in soil compaction and erosion. -Off-road driving in the EPL area is strictly prohibited. Stick to approved site access roads by the Conservancy. -Strict topsoil management and progressive rehabilitation should be implemented.	-No proliferation of informal vehicle tracks created by project activities. -No new erosion gullies. -No complaints from the Conservancy or other stakeholders about the unnecessary creation of tracks in the area (visual nuisance).	-Exploration Manager -ECO	Throughout exploration

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-All trenches and pits should be fenced during use and backfilled immediately after sampling to restore natural contours.			
	Soil erosion: diversion of runoff, no excavation on steep slopes	The following erosion control measures should be implemented. -Construct diversion channels, berms, or contour drains upslope of disturbed areas to redirect surface runoff away from work sites. -Use energy dissipators (e.g., rock check dams, riprap) at outfalls to reduce flow velocity and prevent gully formation. -No Excavation on Steep Slopes -Avoid excavation (trenching), drilling pads, or access road construction on slopes exceeding 20–25° where possible. -Clear only the minimum vegetation required for drilling pads, trenches, or access routes. -Clearly demarcate work boundaries to prevent unnecessary soil disturbance. -Backfill and compact trenches and drill sites immediately after completion. -Re-contour disturbed surfaces to natural landform and apply topsoil and native vegetation promptly. -Use of Silt Traps and Sediment Fences, especially near rivers and streams. -Install silt fences or sediment traps downslope of disturbed areas to capture eroded material. -Inspect and clean these regularly, especially after rainfall. -Apply gravel cover or biodegradable geotextiles on exposed soil surfaces.	-No proliferation of informal vehicle tracks created by project activities. -No new erosion gullies. -No complaints from the Conservancy or other stakeholders about the unnecessary creation of tracks in the area (visual nuisance).	-Exploration Manager -ECO	Throughout exploration

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Use rock armouring or culverts at stream crossings to prevent undercutting and washouts. -Avoid Work During Heavy Rainfall -Schedule earthworks and drilling during dry seasons to minimize runoff and sediment transport. -Maintain a minimum 100m buffer between exploration activities and rivers, streams, or drainage lines to prevent sediment entry. -Conduct regular inspections after rainfall events to identify and repair eroded areas, failed drains, or silt fences.			
Soils and water resources	Soils and water resources pollution	-There is a Zero tolerance for pollution. Therefore, project waste or effluent must NOT be released into the environment (water and soil/ground surface) without treatment, and any contaminated soil or materials must be removed promptly. -Sewage/wastewater facilities (such as a French drain system) should not be constructed along a watercourse or within 100m of any watercourse (active stream) in accordance with the Water Resources Management Regulations (2023). -Boreholes not required post-exploration should be capped or backfilled to prevent them from becoming conduits for groundwater contamination or hazards to people and animals. -Spill control preventive measures should be in place on site to manage soil contamination, thus preventing and or minimizing the contamination from reaching water resources. -Sensitize project employees about the impacts of soil pollution and advise them to follow appropriate fuel handling procedures. -Develop and prepare countermeasures to contain, clean up, and mitigate the effects of an oil spill. This includes keeping spill response procedures and a well-stocked cache of supplies easily accessible.	-No complaints of pollutants on the soils and eventually in the water due to exploration activities -No visible oil spills on the ground or pollution spots. -Complaint's logbook -Availability of waste containers -Non-permeable material to cover the ground surface in areas where hydrocarbons and potential pollutants are utilized.	-Exploration Manager -ECO	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Ensure employees receive basic Spill Prevention, Control, and Countermeasure (SPCC) Plan training. -Project machines and equipment should be equipped with drip trays to contain possible oil spills when operated on site. -Polluted soil should be removed immediately and put in a designated waste-type container for later disposal. -Drip trays must be readily available on this trailer and monitored to ensure that accidental fuel spills along the tank trailer path around the exploration sites are cleaned on time (soon after the spill has happened). -Polluted soil must be collected and transported away from the site to an approved and appropriately classified hazardous waste treatment facility. -Washing of equipment contaminated with hydrocarbons, as well as the washing and servicing of vehicles, should take place at a dedicated area, where contaminants are prevented from contaminating soil or water resources. -Toilet water should be treated using chemical portable toilets and periodically emptied before reaching capacity and transported to a wastewater treatment facility. -The working sites should be equipped with a hydrocarbon spill kit. -Oil spills should be taken care of by removing and treating the soil affected by the spill. -The servicing of vehicles near watercourses and unlined ground surface is prohibited -The drilling fluids should be properly managed and contained in suitable containers and handled with care. -The accidental contamination of any major nature should be reported to the authorities (MAFWLR for effluent/wastewater and MIME for hydrocarbons).			

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Biodiversity	Loss of Fauna and Flora	<u>Fauna (animals)</u> -Refrain from disturbing or killing small soil and animal species found in rock outcrops on and around the site. -Breeding sites for occurring on and around the EPL should not be destroyed or disturbed. -Exploration open trenches and drill holes should be secured (temporary fencing), barricaded, backfilled, and capped after sampling is completed to prevent injuries to animals, including livestock. -Incorporate Environmental awareness and biodiversity preservation into the employment contracts of all workers. -Exploration schedules should avoid sensitive periods such as wildlife calving seasons, and a wildlife monitoring program should be instituted. -If desert elephants frequently occur in certain corridors in the EPL area, operations should be adjusted to avoid blocking their access to water or forage. <u>Flora (vegetation):</u> -Avoid unnecessary removal of the already scarce vegetation to promote a balance between biodiversity and the project. -Vegetation found on the site, but not in the targeted exploration site areas or access route, should be left undisturbed/avoided. -Vehicle movement should be restricted to existing roads and tracks to prevent unnecessary damage to the surrounding vegetation. -No onsite vegetation should be cut or used for firewood. -Access roads should be created in a manner that disturbs minimal vegetation.	-No disturbance to unmarked areas. -No complaints from locals regarding unauthorised vegetation removal or cutting down of trees. -No complaints of wildlife hunted by the project workers. -No intentional disturbance and destruction of site vegetation and faunal species -Barricading tape (to indicate working areas) -Visible preservation of onsite vegetation	-Exploration Manager -ECO	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-The removal of vegetation for tracks or camps should be minimized. -No off-road driving outside demarcated exploration areas. This is to avoid unnecessary damage to vegetation crusts. -The introduction of invasive plant species (through vehicle tires or imported materials) is not allowed. -Commit to rehabilitating any compacted areas to enable regrowth, as far as practicable. -Environmental awareness on faunal and floral biodiversity preservation should be provided to the workers and contractors. This should be incorporated into the workers' contracts.			
Illegal hunting	Illegal hunting of wildlife	-The Poaching (illegal hunting) or disturbance/harming of wildlife on the EPL and surrounding areas is strictly prohibited. -A No Tolerance to Poaching Policy should be developed and applied to all site personnel (workers) as well as project visitors. -Incorporate a No-tolerance rule for poaching in every employment contract and ensure that the workers understand the seriousness of this. In other words, there is no tolerance for poaching or wildlife crime. -A code of conduct should be incorporated into the employees' contracts to discourage any form of wildlife poaching intentions.	-Proven incident reports of illegal hunting of wildlife by the crew were reported to the Police. -Contact details of the Anti-poaching Police Unit are provided and visible on-site	-Exploration Manager -ECO	During site setup and throughout exploration
Land Use	Conflict between land uses and exploration activities	-Exploration activities should not in any way hinder the existing land uses within the EPL but rather promote co-existence throughout the project operations while respecting other land users (Conservancy and related operations). -Limit the project activities to the actual EPL active sites only, but do not unnecessarily wander and drive around the area.	-Land use permits/authorizations. -Compliance with conditions set within operational permits by relevant and affected authorities.	-Exploration Manager -Proponent -ECO	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Ensure that the project activities comply with the conditions set by the competent, regulatory, and affected authorities, such that the proposed exploration activities do not severely impact the different existing activities around the EPL.	-Little to no complaints of significant interference from the neighbouring land users		
Visual (aesthetic)	The scarring of the landscape and the presence of exploration vehicles and machinery may impact the scenic view of the area for tourists and travellers on the roads.	-The exploration activities should be done away from the roads, and the explored sites rehabilitated as far as possible. -Concentrated stone block sampling in the areas behind the mountain that overlook the local roads. In other words, exploration activities that are likely to leave visible scars on the hills or mountains should be done in areas behind these mountains and not in areas that are visible from the road. -Minimize the land scarring by targeting specific areas only. -The campsite should be established behind outcrops where possible to limit their obvious presence to road users (tourists and travellers alike). -All equipment, litter, and signage should be removed. -If any access roads/tracks were created, they should be scarified or otherwise returned to a natural state unless the conservancy or landowner requests to keep them for their use.	-No complaints of visual nuisance from the travellers or Conservancy -No disturbed site areas are left without rehabilitation -Exploration works are limited to areas far from the roads.	-Exploration Manager	Throughout the exploration phase
Road use and safety	Increase in vehicular traffic flow.	-Project-related goods and services should be delivered to the site once or twice a week to reduce the daily movement of trucks and put too much pressure on local roads. -Drivers of all project phases' vehicles should have valid and appropriate driving licenses and adhere to the road safety rules. -Drivers should drive slowly (40km/hour or less) and be on the lookout for wildlife. -Ensure that the site access roads are well equipped with temporary road signs.	-No complaints from members of the public regarding vehicular traffic issues related to the project activities. -All personnel operating the project vehicles and machinery are appropriately licensed and in possession of valid driving licenses. -Demarcated areas for parking, offloading, and	-Exploration Manager -ECO	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Project vehicles should be in a roadworthy condition and serviced regularly to avoid accidents owing to mechanical faults. -Vehicle drivers should only make use of the designated site access roads provided and as agreed. -Vehicle drivers should not be allowed to operate vehicles while under the influence of alcohol. -Project vehicles should be parked within the boundary or demarcated areas for such purpose. -Deliveries from and to the site should be done optimally during weekdays and between the hours of 8 am and 5 pm. -The site access road(s) should be maintained to an acceptable standard for the vehicles.	- loading zones are on sites. -No creation of unnecessary tracks on site.		
Local roads	Overuse and maintenance	-The heavy trucks transporting materials and services to the site should be scheduled to travel a maximum of twice a week to avoid daily travelling to the site, unless in cases of emergencies. -Consider frequent maintenance of local roads in the area to ensure that the roads are in good condition for other road users, such as travellers and tourists from outside the area.	-Visible efforts of maintaining access and communal roads by the Proponent	-Proponent -Exploration Manager	Throughout exploration, when necessary
Occupational Health and Safety	General health and safety associated with project activities in both phases	-During inductions, provide project workers with an awareness training of the risks of mishandling equipment and materials on site and the health & safety risks associated with their respective jobs. -Project workers should be properly equipped with adequate and appropriate personal protective equipment (PPE) such as coveralls, gloves, safety boots, earplugs, dust masks, safety glasses, etc. -Heavy vehicle, equipment, and fuel storage sites should be properly secured, and appropriate warning signage should be placed where visible.	-Comprehensive health and safety plan for all exploration activities compiled. -Quarterly refresher training on health & safety -Occupational Health and Safety Personnel - Health and Safety Training	-Proponent -Exploration Manager -ECO	Throughout exploration and training offered as and when required

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Drilled exploration holes that will no longer be in use or are to be used later after being drilled should be properly marked for visibility and capped/closed off. -Trenches should be temporarily fenced off during sampling, and once completed, they should be backfilled thereafter -Drill cuttings and excavated materials should be put back into the hole and the holes filled and leveled, and trenches backfilled respectively. -An emergency preparedness plan should be compiled, and all personnel appropriately trained. -Workers should not be allowed to enter the working sites when under the influence of alcohol, as this may lead to mishandling of equipment, which results in injuries and other health and safety risks. -Ensure that goods and projected loads are securely fastened to vehicles to avoid falling and injuring people. -Warning signage should be erected at hazardous site areas such as open trenches. -The site areas that are considered temporary risks should be equipped with "danger" or "cautionary" signs written in languages such as Otjiherero/Otjizemba and English. -Project vehicles should observe low speed limits to avoid accidents and dust. -Community members, especially children or herders (through local leadership), should be made aware when heavy equipment will be operating nearby.	-Availability of fully-furnished first aid kits -Trained worker to administer first aid		

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
	Potential increase in the prevalence of HIV and AIDS, as well as other sexually transmitted diseases (STDs) prevalence	-Engage workers in sexual health talks and training about the dangers of engaging in unprotected sexual relations, which result in contracting HIV/AIDS and other sexually transmitted infections. -Provision of condoms and sex education through the distribution of pamphlets and health training. These pamphlets can be obtained from the nearest local health facility in Opuwo.	-No new infections recorded linked to project workers -Occupational health and safety personnel -Sex and Health Education/Awareness -Provision of condoms at the campsite	-Exploration Manager -ECO	Throughout exploration
	Accidental fire outbreak	-Portable and serviced fire extinguishers should be provided at the site and camp. -No open fires to be created by project personnel on-site. -Consider using gas or paraffin cookers to prepare food instead of open fires. The cook/stove's fire should be put out before leaving the camp. -Make provision for smoking areas for crew members who smoke. This is to ensure that the cigarettes' fire is completely put out and disposed of in the allocated bins at the smoking area. -Potential flammable areas and structures, such as fuel storage tanks, should be marked as such with visible signage. -Raise awareness among workers on the impact of careless handling of fires and flammable substances in the fire.	-No wildfires recorded (due to the presence of workers) -Fire extinguishers (1 per vehicle) and 1 per working site	-Proponent -ECO	Throughout exploration
Archaeology and heritage	Accidental disturbance of archaeological or heritage objects	The mitigation measures provided herein should be implemented alongside the Archaeological Management Plan (AMP) appended to the AHIA Report for EPL-10736. -If any archaeological materials, human burials, or skeletal remains are uncovered during mining activities, then the work in the immediate area should be halted, the finds would need to be reported to the Heritage Authority, and may require inspection by an Archaeologist. The ECO should have the	-Preservation of all artefacts and objects that are discovered on and around the project site -Salvage equipment -Archaeologist to recommend further actions	-Exploration Manager -ECO -Operator (Driller or Excavating personnel)	As and when required, i.e., before site set up, and during exploration.

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		area fenced off and contact NHC (Tel: +264 61 244 375), National Forensic Laboratory (+264 61 240 461) immediately. -Under no circumstances shall any artefacts be removed, destroyed, or interfered with by anyone on the site; and Contractors and workers shall be advised of the penalties associated with the unlawful removal of cultural, historical, archaeological, or palaeontological artefacts, as set out in the National Heritage Act (Act No. 27 of 2004), Section 52 (2). -Any pile of stones or mound of earth looking even remotely like a grave should be avoided at all costs. -A "No-Go-Area" should be put in place where there is evidence of sub-surface archaeological materials, archaeological sites, gravesites, historical, rock paintings, cave/rock shelters, or past human dwellings. It can be a demarcation by fencing off or avoiding the site completely by not working closely or near the known site. The 'No-Go Option' might have a NEUTRAL impact significance. -Cognizance must be taken of the larger cultural & heritage landscape of the area to avoid the destruction of previously undetected heritage sites. Should any previously undetected heritage or archaeological resources be exposed or uncovered during the development phases of the proposed project, these should immediately be reported to the heritage specialist or heritage authority (National Heritage Council of Namibia). -The Proponent and Contractors should adhere to the provisions of Section 55 of the National Heritage Act in the event significant heritage and cultural features are discovered in the course of developmental works. -It should be noted that the subterranean presence of archaeological and/or historical sites, features, or artefacts is always a distinct possibility. Care should therefore be taken when development commences that if any of these are discovered, work on the site ceases immediately and a	-Flag tapes -GPS (site marking)		

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		qualified archaeologist is called in to investigate the occurrence. -Bi-annual auditing is highly recommended. -Consider seeking permission from locals/neighbours before accessing certain areas and understanding local customs.			
Littering and waste management (general waste and sanitation)	Environmental Pollution	-Responsibly dispose of waste and do not litter. -No toxic and hazardous substances should be left on site. Drill cuttings and wastewater should be contained in sumps away from any drainage lines and properly disposed of. -After each day's work, ensure that there is no waste left on the working sites or scattered around the camp. -All domestic and general operational waste produced daily should be contained on-site until it is transported to designated waste sites. -No waste may be buried or burned on site or anywhere else. -The exploration site should be equipped with separate waste bins for hazardous and general/domestic waste. -A penalty system for the irresponsible disposal of waste on-site and anywhere in the area should be implemented. -Ensure careful storage and handling of hydrocarbons on site. -An emergency plan should be available for major/minor spills at the site during operational activities.	-No visible litter around the project area -Provision of sufficient waste storage containers -Waste management awareness -Waste disposal permits to municipalities -Environmental, Health, and Safety Statements and Policy	-ECO -Exploration Manager	Throughout the exploration phase
	Wastewater is generated by exploration workers living on-site.	-The following wastewater (sewage) options are recommended as they would become suitable in the environment where the exploration campsite would be: 1) If the campsite is near an existing community, the project should 'tap' into the French drain system that is used in the community. The Proponent will ensure the maintenance of these sewage facilities, not only for the project personnel, but also for the community. However, consent will be obtained	-Adequate toilet and basic ablution facilities on site -Chemical toilets (as deemed suitable) Sewage removal operator	-Proponent -Exploration Manager -ECO	The suitable sewage management option should be installed or implemented before the campsite is set up

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		from the local community leader(s) before the project can establish and or use community sewage infrastructure. 2) Consider using temporary septic tanks. 3) Consider constructing a French drain, but not along a watercourse or within 100m of any watercourse (active stream) in accordance with the Water Resources Management Regulations (2023). The application for an effluent discharge permit will be made to the MAFWLR and issued before the system is constructed -Potential contaminants such as hydrocarbons and wastewater should be contained on site and disposed of per municipal wastewater discharge standards so that they do not contaminate surrounding soils and eventually groundwater. -No open defecation is allowed on and around the site. -Sewage waste should be stored as per the portable chemical toilets supplied on site and regularly disposed of at the nearest treatment facility -Provide sufficient toilet facilities for workers (mobile/portable chemical toilet if possible). -Emptying of chemical toilets according to the manufacturer's specifications.	-Waste treatment agents/chemicals to treat wastewater/effluent -The effluent discharge permit is applied for and issued for the project		The rest of the measures should be implemented throughout the exploration phase
Air Quality	Dust generation	-Exploration vehicles within the area should not be driven at a speed of more than 40 km/h to avoid dust generation. -When and if the project reaches the advanced stages of exploration, where dust will emanate, dust suppression (using water sparingly and under a permit) should be used on problematic gravel routes and near exploration sites. -Dust masks, eye protective glasses, and other respiratory personal protective equipment (PPE) such as face masks should be provided to the workers in on-site drilling areas, where they are exposed to dust.	-No complaints from the public about vehicle emissions and dust generation. -Visible efforts to curb dust -Complaint's logbook -Dust suppressant (Water)	-Exploration Manager -ECO	Throughout the exploration phase

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Excavating equipment should be regularly maintained to ensure drilling and excavation efficiency and to reduce dust generation and harmful gaseous emissions. -Dust suppression on access routes (using water sparingly and under permit) and maintaining mufflers on generators			
Noise	Nuisance	-Any homesteads or settlements in the vicinity of the intended/targeted exploration site areas should be timely notified ahead of noisy activities. -Noise from operations' vehicles and equipment on the sites should be at acceptable levels. -Exploration hours should be restricted to between 07h30 and 17h00 to avoid noise and vibrations generated by exploration equipment and the movement of vehicles before or after hours. -When operating the drilling machinery onsite, workers should be equipped with personal protective equipment (PPE) such as earplugs to reduce exposure to excessive noise.	-Complaint's logbook -Noise protective equipment for workers	-ECO -Exploration Manager	Throughout exploration

Table 5-2: The Mitigation measures for site rehabilitation

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
Progressive Rehabilitation and Decommissioning Phase					
Rehabilitation	Disturbance and damage to the site land	-All drilled boreholes and excavated pits related to the project activities should be capped and backfilled, respectively. -All waste generated and stored on site during exploration activities should be disposed of at the nearest solid waste management sites. -The stockpiled topsoil should be leveled soon after completion of works at sites.	-Capped boreholes and backfilled pits/trenches -Excavators and other backfilling/demolishing machinery -No sign of waste or littering seen on site and around site areas.	-Proponent -Exploration Manager	Progressive rehabilitation is done throughout the exploration phase, and complete decommission and rehabilitation are done after

Aspect	Impact	Management and Mitigation Measure(s)	Key Performance Indicator (KPI)	Implementation Responsibility	Timeline
		-Any temporary setup on site should be dismantled, and the area rehabilitated as far as practicable, to its original state. -Explored areas on worksites should be progressively rehabilitated by stockpiling and backfilling. -All equipment, litter, and signage should be removed. -If any access roads/tracks were created, they should be scarified or otherwise returned to a natural state unless the conservancy or landowner requests to keep them for their use. -Provision of both financial and technical resources for progressive rehabilitation. -The two Conservancies should be consulted to approve and sign off on Site Rehabilitation Completion	-Carrying away of waste, and removal of vehicles and equipment from the site -No stockpiled topsoil (topsoil is levelled after completion of each work) -Campsite dismantled, - Campsite dismantled, site levelled, and materials taken away from the site -Visible signs of stockpiled topsoil -Record of trenches excavated, and boreholes drilled -Waste containers on sites -Photo records of backfilled sites -Records of finances set aside for decommissioning activities		completion of exploration works. From zero (0) to 3 months post-exploration for site backfilling and waste removal Three (3) to six (6) months post-exploration for vegetation recovery and site stabilization.
Progressive rehabilitation is done throughout the exploration phase, and complete decommissioning and rehabilitation after completion of exploration works.					

5.4 Environmental Monitoring Actions

To ensure that the implementation of recommended environmental management measures is working and produces the desired results (minimizing the "medium" and upholding the "low" significance ratings of impacts), certain key impacts will need to be monitored and reported on. The environmental aspects to be monitored are shown in Table 5-3. The "Observation, compliance status, and Recommended Action" columns will be completed for every monitoring done on site.

Monitoring reports are to be compiled by the project ECO, audited by an Independent Environmental Consultant, and submitted to the DEAF for archiving on a bi-annual basis (every 6 months throughout the project operations) or as required by the Environmental Commissioner (as per the ECC conditions). The environmental components or features provided in the Table will be updated accordingly once the project commences.

Table 5-3: Monitoring of Biophysical and Social Aspects referred to in the assessment (modified after Resilient Environmental Solutions, 2019)

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if the threshold is exceeded
Water and soil pollution									
Soil pollution by hydrocarbons (fuel and lubricant spills)	Complaints from land custodians/users or occupiers of land within the project sites	To prevent contamination of site soils	No complaints from land custodians or the public about visible oil spills	Inspection of complaints logbooks	Weekly	ECO	ECO-> Exploration Manager	A logged complaint	Further consultations with the land custodians or users/communities
Wastewater is generated by exploration workers living on-site.	Open defecation and urination.	To prevent environmental pollution	Adequate toilet facilities on site. Complaints from the public about open defecation.	Visual observation. Inspection of the complaint's logbook.	Weekly	ECO	ECO-> Exploration Manager	A logged complaint	Clean-up of affected areas.
Soils									
Loss of topsoil	Increased loss of soil	To prevent loss of topsoil	No proliferation of informal vehicle tracks. No new erosion gullies	Visual observation	Weekly	ECO	ECO-> Exploration Manager	Proliferation of new vehicle tracks Formation of new gullies in work areas	Rehabilitation of the affected explored areas

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if the threshold is exceeded
Air quality (Dust)									
Increase in dust generation, which might negatively affect occupational and residential respiratory health.	Complaints from the public about an increase in dust generation.	To reduce public complaints and prevent negative changes in air quality due to exploration activities	No complaints from the public about increased dust generation.	Inspection of the complaint's logbook.	Weekly	ECO	ECO-> Exploration Manager	A logged complaint	Dust suppression around working areas to reduce fugitive dust
Hydrocarbon emissions from vehicles	Complaints from the public about increased vehicle fumes	Same as above.	No complaints from the public about increased vehicle emissions	Inspection of the complaint's logbook.	Weekly	ECO	ECO-> Exploration Manager	A logged complaint	Servicing of vehicles and machinery by a certified service provider
Poaching (Illegal hunting)									
Illegal hunting of wildlife	Reported poaching incidents by the project team	To prevent illegal hunting of wildlife	Incident reports of illegal hunting of wildlife by exploration workers.	Consultation with the local Police Service for reported incidents of poaching.	Weekly	ECO	ECO-> Exploration Manager > local Police Service (Anti-poaching Unit)	An incident report was logged with the local Police Service	Appropriate action will be decided by the local Police Service
Habitat loss (Biodiversity)									
Localised loss of habitat and vegetation	Loss of habitat	To prevent loss of habitat outside areas of interest	No disturbance to unmarked areas within	Visual observation	Weekly	ECO	ECO -> Exploration Manager	Vegetation clearance outside of	Rehabilitation of affected areas to the

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if the threshold is exceeded
			the project area					marked areas.	satisfaction of the ECO
Occupational and Public Health and Safety									
No health and safety plan for exploration activities.	Compiled a health and safety plan for exploration activities.	To prevent health and safety impacts	No significant health and safety incidents (i.e., serious injuries or loss of life)	Visual observation Inspection of complaints logbooks	Daily/ weekly	ECO and Exploration Manager	ECO-> Exploration Manager	Health and safety incident	Remedy the consequences
Potential increase in the outbreak of wildfires due to project activities	Occurrence of wildfires	To prevent environmental damage caused by wildfires	No wildfires recorded (due to the presence of exploration workers)	Visual observation	Daily	ECO	ECO -> Exploration Manager -> local Police Service	Outbreak of wildfires due to the exploration workers	Rehabilitation of affected areas
Archaeology and cultural heritage									
Potential disturbance of archaeological and cultural heritage resources	Presence or unearthing of archaeological or cultural heritage resources	To prevent the destruction of artefacts and sites	Preservation of all artefacts and sites that are discovered within the site boundary or around the project site area	Inspection of the records of findings	Daily	ECO Operator / Contractor	Operator->Foreman-> Superintended->ECO->Project Archaeologist -> National Heritage Council (NHC)	Unearthing of archaeological or cultural heritage resources	Cease all activities on site and wait for NHC to inspect the site and give further instructions/actions
Employment creation and Corporate Social Responsibility (CSR)									

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if the threshold is exceeded
Creation of employment, procurement of goods and services	Employment opportunities -Community projects support - Local/regional procurement	To ensure that locals benefit from the Project	Employment, community support, and local and regional procurement	Inspection: employed, procurement & community project records	Monthly	Exploration Manager	Exploration Manager or Proponent	Number of CSR projects	Open communication and reasonable requests/proposals
Noise									
Potential increase in noise	Above ambient noise levels.	To ensure that the generated noise does not disturb residents.	Complaints from residents about the noise generated.	Inspection of the complaints logbook	Weekly	ECO	ECO -> Exploration Manager	A logged complaint about above normal noise levels	Revision of site activities
Vehicular Traffic									
Increase in traffic density on declared Roads Authority (RA) roads or damage to these.	Complaints from the public about the increase in traffic on the roads. Complaints about damage to RA roads caused by the movement of project	To ensure continued ease of access to local roads by residents/communities.	No complaints from the public about the increase in traffic due to exploration activities	Inspection of logbooks	Weekly	ECO	ECO -> Exploration Manager -> Roads Authority	A logged complaint about a traffic increase or damage to RA roads	Find alternative access roads for the workforce. Rehabilitation of affected roads

Impact	Parameter to be Monitored	Monitoring Objective	Key Performance Indicator (KPI)	Methods of Monitoring	Frequency	Responsible Party	Reporting structure	Threshold	Action if the threshold is exceeded
	vehicles and machinery.								
HIV and AIDS									
Potential increase in HIV and AIDS prevalence.	New HIV or sexually transmitted infections (STIs)	To prevent new infections in the area	No new HIV or STIs infections recorded	Liaison with local health facilities	Monthly	ECO	ECO -> Exploration Manager -> Ministry of Health and Social Services	Recorded new HIV or STIs linked to exploration workers	Continued sex education and provision of condoms
Environmental Pollution (Littering)									
Environmental pollution from solid waste during exploration activities.	Scattered litter	To prevent littering of the general project area	No visible litter around the project area	Visual observation	Daily	ECO	ECO -> Exploration Manager	Visible littering around the project site	Clean up of the affected areas and ensure workers utilize the waste containers provided.
Visual									
Visual impact owing to the project's exploration activities	Contrasting landscape (eyesore to travelers on the local roads)	To prevent and or reduce the appearance of contrasting land scars	Reduction of and minor contrasting landscapes in the project site areas	Visual observation	Weekly	ECO	ECO -> Exploration Manager	Major and very visible contrasting land scars on the site areas	Effective implementation of the provided measures and continual improvements.
Site Rehabilitation									
Soil and land disturbance due to exploration activities.	Stockpiled topsoil and very disturbed site areas	To prevent major soil/land damage by project activities	No major soil and land disturbance	Visual observation	Daily	ECO	ECO -> Exploration Manager	Visible soil and land disturbance	Effective progressive levelling of topsoil and backfilling of pits/holes

6 GRIEVANCE REDRESSAL MECHANISM (GRM) (ADOPTED FROM SOLNAM ENERGY SUPPLEMENTARY ESIA BY PALLETT AND SHAGAMA, 2024)¹

A process will be established for stakeholders and members of the public to communicate any concerns or complaints about the project during its implementation. This grievance mechanism will be implemented throughout the project cycle, providing a channel of communication from the public to the exploration manager, so that issues can be resolved timely and amicable.

6.1 Objectives of the Grievance Mechanism

The objectives of the grievance mechanism will be to:

- Clarify the nature of the grievance,
- Provide stakeholders/communities with a platform to submit their grievances and or comments on the project activities,
- Record the grievances received as well as comments in a grievance log (complaints logbook),
- Review, investigate, and promptly resolve the grievances from a stakeholder and or the public,
- Respond (solution to the grievances) to the stakeholder and ensure that they are satisfied with the mitigating action or solution (response) provided, and
- Communicate the responses to the stakeholders and provide satisfactory feedback or action to their grievances.

6.2 Proposed Grievance Procedures

6.2.1 Categorization of Stakeholder (Interested & Affected Party (I&AP))

Grievances may arise from stakeholder groups or individual I&APs that were registered during the EIA process, and other unforeseen groups. However, the known and anticipated stakeholder groups that would potentially form part of the grievance mechanism include:

- **Local community members**, such as residents/occupiers of land inside the EPL and near the project site.
- **Employees and exploration contractors**: personnel or workers who will be involved in the exploration project

¹ F. Shagama and J. Pallett. (2024). Stakeholder Engagement Plan (SEP) for the Proposed Construction and Operation of a 55MW Solar PV Plant and Associated Infrastructures on a Portion of Portion 2 of Farm Klein Spitskop No. 153 near Keetmanshoop in the //Kharas Region, Namibia. Windhoek. Unpublished.

- **Local businesses:** these are companies that are affected by the project, directly or indirectly
- **Government and regulatory bodies** such as local authority, regional (Kunene Regional Council), or national agencies (MEFT, Ministry of Industries, Mines and Energy (MIME), and others) with oversight.
- **Environmental Groups:** these are civil society groups or non-governmental organizations (NGOs) that focus on environmental protection and sustainability. The registered NGO for this EIA are Community Conservancies (Marienfluss and Orupembe) that are overlain by the EPL, the Legal Assistance Center (LAC), the Namibian Environment and Wildlife Society (EIA Tracking and Monitoring in Namibia), etc. **However, NO exploration activities will be conducted within the Orupembe Conservancy.**

6.2.2 Categorization of Grievances

Grievances come in different forms or types; thus, they are categorized below to streamline processes and ensure effective handling of concerns and issues raised by stakeholders. The type of grievances anticipated from the project, their brief description, and whether they are internal or external, are provided in Table 3 below.

Table 6-1: Types (categories) of grievances

Type of grievance (issue)	Brief description	Internal or external
Environmental (biological and physical)	This will entail issues raised on local ecosystems, wildlife, livestock, as well as soil and water pollution (deteriorating quality) and air (dust generation), etc.	External
Social	Entails disregarding local cultural values and norms, trespassing on private properties by project workers, and loss of livelihood due to project activities that may significantly affect conservation and tourism-related activities.	External
Economic	Issues related to job creation (unfair recruitment practices such as outsiders taking jobs that can be done by locals of the site area), unfair labour practices and compensations, unfulfilled commitments for corporate social responsibilities, and local investment through procurement of available services and goods for the project (opportunities given to out-of-area /town /region companies at the expense of local businesses)	External
Operational Grievances	-Socio-Economic and Land Use, Cultural heritage -Land use disputes (operations outside the EPL demarcated site boundaries)	External

Type of grievance (issue)	Brief description	Internal or external
	-exploration-related complaints	
Occupational health and safety	Concerns about worker safety, health hazards. An example is workers working without proper or appropriate PPE (protective gear) for their tasks. Lack of first aid or trained first aid administering personnel on-site, incidents involving workers on or near the project site, etc. -Discrimination and harassment among workers	Internal
Community health and safety	-Exposure to risk such as chemicals, noise, or dust -Complaints about health issues perceived to be linked to the project. Safety Issues such as road accidents related to project trucks, especially speeding project vehicles, as well as incidents involving community members.	External

It is against this background that the grievances associated with the project will be handled by the Proponent through the Exploration Manager and the Exploration Contractor. These will include the following steps and timelines:

- For internal grievances, a grievance registration book (register) will be kept onsite for workers and visitors, where site issues will be recorded for immediate addressing. The Exploration Manager will have access to the register copy.
- A grievance registration book will be available on-site, for stakeholders within proximity of the site (such as local communities) and who are comfortable submitting issues in person (clearly handwritten letters).
- Alternatively, stakeholders can submit their grievances:
 1. Intentional community meetings at the Marienfluss and or Orupemebe Conservancy Offices or the Kunene Regional Council for face-to-face submissions.
 2. Via email or phone messages to these officials,
 3. Physical mail or drop-box for formal written grievances at the exploration camp through the PRO/CLO;
 4. Stakeholders/I&APs who are based in or near Opuwo can submit their written grievances to the office of the Kunene Regional Council, attention to the Chief Regional Officer, and copying the Epupa Constituency Councilor.

- Stakeholders may also submit anonymous grievances (to the PRO/CLO) if not comfortable providing their identity.
- The Kunene Regional Council management will then forward the concerns to the Naxos Investments Exploration Manager for consideration.
- Open discussion of the issue or problem by the Exploration Manager to find solutions to the issue(s)/grievance(s). Provision should be made for collaboration between Naxos Investments and the stakeholder/I&APs raising the grievance to resolve the issue. **Responses or resolutions should be provided within 7 days**, unless there is a reasonable explanation for a delayed response. Any delay should be communicated to the stakeholder/I&AP (complainant).
- Naxos Investments will need to keep a detailed record of discussions, concerns, solutions provided, and any new solutions to ensure clarity and accountability.
- If the stakeholder is not satisfied with the proposed resolution:
 1. Naxos Investments can offer revised solutions (responses) that address stakeholder concerns.
 2. Naxos Investments or the complainant can engage the local Traditional Authority and, if necessary, the Kunene Regional Council for further assistance and mediation in resolving the issues.
 3. Escalation to higher governance bodies, such as the MEFT, should be sought before going the legal route to resolve the issue.
- It is important to keep all stakeholders/I&APs informed about the situation (grievance) and any actions being taken. Clear communication can help manage expectations and reduce tension between Naxos Investments and the stakeholder/I&AP (complainant).

6.2.3 Grievances Submission and Recording

The Grievance Mechanism stipulates the need for the following:

- **Training** – those who are responsible for addressing grievances must have detailed knowledge of how the project's grievance mechanism works and who to speak with on each category of issues.
- **Record Keeping** – all aspects of the grievance management process must be comprehensively documented, and accurate records should be maintained. The information to be contained in these records will include:
 1. Full name of the stakeholder (complainant)
 2. Contact details (phone number and, if applicable, email address)
 3. Grievance details
 4. Date of grievance submission and signature of the complainant
 5. Name of the person who received the grievance and signature
 6. Provision for feedback or response should be made on the grievance record

7. Date when feedback is expected, at least within 7 days from grievance submission. When delays are expected, an explanation should be provided before the 7-day period elapses.
- Grievance resolution process: In terms of ensuring that the process is effective, Naxos Investments will need to include the following steps
 - a) Acknowledgment: confirming receipt of the grievance
 - b) Investigation: steps taken to investigate the issue raised
 - c) Resolution proposal: provide solutions or mitigating actions based on findings
 - d) Implementation: Steps taken to implement the agreed-upon solution
 - e) Follow-Up: checking in with the complainant to ensure that they are satisfied with the resolution or solution proposed or implemented.
 - Reporting – Naxos Investments will compile information relating to engagement activities as appropriate for the monthly social and environmental reports.

6.2.4 Monitoring of the Grievance Mechanism

The effectiveness of the grievance mechanism should be monitored on a bi-monthly basis to see what is working and what is not. If not working as intended, the mechanism will need to be amended accordingly. The effectiveness of the grievance mechanism will be monitored for the following aspects, or by answering the following questions:

1. How easily can stakeholders access the grievance mechanism?
2. What communication channels are available to submit grievances, and which ones are more effective or preferred by stakeholders? Online via email, in-person onsite, phone calls (but preferably in writing for record keeping).
3. Are stakeholders aware of the existence of the grievance mechanism?
4. Evaluate if the information about the mechanism is communicated clearly and effectively.
5. Track the time taken to acknowledge and respond to grievances and how quickly grievances are resolved.
6. How thorough are investigations into submitted grievances, and if grievances are adequately addressed?
7. Evaluate whether stakeholders are involved in the resolution process when appropriate.
8. Evaluate stakeholder satisfaction by gathering feedback from stakeholders about the grievance resolution process. This can be enhanced by conducting surveys or interviews after resolution to assess satisfaction levels.

9. Clearly document grievances and resolutions to ensure there is transparency in documenting the grievance process, including decisions made and outcomes.
10. Check if there are regular reports on grievance trends and resolutions shared with stakeholders.
11. Monitor for any signs of retaliation against those who raise grievances, ensuring that the mechanism operates without fear of negative consequences.
12. Assess if the grievances and resolutions inform project improvements and adjustments to policies or practices. This should be used to improve the Project practices for the satisfaction of all and environmental as well as social sustainability.
13. Evaluate whether there is a regular review of the grievance mechanism itself to identify gaps, i.e., areas for improvement.
14. Analyze data on grievances to identify patterns or recurring issues that may need to be addressed systematically.
15. Monitor the demographics of those submitting grievances to ensure inclusivity.

The above-listed aspects will need to be monitored (and improved where necessary) to ensure that the grievance mechanism remains effective, responsive, and aligned with stakeholder needs. The internal grievance mechanism will follow the same approach as the external grievances, with the difference that the complainant would be the workers or site visitors and not stakeholders.

Community engagement should be monitored and reported by Naxos Investments throughout the exploration period, and this will involve the:

- Continuous updating of the stakeholder list,
- Recording of all consultations held, and
- Recording of all grievances received and dealt with.

6.2.5 Management of Information

All the meetings and interactions related to the project engagement should be recorded by Naxos Investments through the:

- Stakeholder list
- Grievance Mechanism Log,
- Minutes of all meetings with stakeholders, and
- Meeting attendance registers.

Appendix 1: Chance Finds Procedure (CFP) After Kinahan, 2020

Areas of proposed activities 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 objectmust as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that heritage reported to the NHC is correctly identified in the field.

- **National Heritage Council (NHC) of Namibia: +264 61 244 375**
- **NHC of Namibia (Technical Office): +264 61 301 903**
- **National Museum: +264 61 276 800**
- **National Forensic Laboratory: +264 61 240 461.**

Archaeological material must NOT be touched. Tampering with the materials is an offence under the Heritage Act and punishable upon conviction under the law.

Responsibility:

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

Procedure:

Action by a 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 the foreman

Action by the foreman

- a) Report findings, site location, and actions taken to the superintendent
- b) Cease any works in the immediate vicinity

Action by the superintendent

- a) Visit the site and determine whether work can proceed without damage to findings
- b) Determine and mark the exclusion boundary
- c) Site location and details to be added to the project GIS for field confirmation by the archaeologist

Action by an Archaeologist

- a) Inspect the site and confirm the addition to the project GIS
- b) Advise NHC and request written permission to remove findings from the work area
- c) Recovery, packaging, and labeling of findings for transfer to the National Museum

In the event of discovering human remains

- a) Actions as above
- b) Field inspection by an archaeologist to confirm that the remains are human
- c) Advise and liaise with NHC and Police
- d) Recovery of remains and removal to the National Museum or the National Forensic Laboratory, as directed.