APP-005829

EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) AREA 10041 IN THE OMAHEKE REGION

ENVIRONMENTAL MANAGEMENT PLAN

Assessed by:

Assessed for:

June 2025

Project:	**EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) AREA 10041 IN THE OMAHEKE REGION: ENVIRONMENTAL MANAGEMENT PLAN**	
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Prepared for:	Votorantim Metals Namibia (Pty) Ltd P O Box 97957, Maerua Park Windhoek, Namibia	
APP No:	250522005829	
Lead Consultant	Geo Pollution Technologies (Pty) Ltd PO Box 11073 Windhoek Namibia	TEL.: (+264-61) 257411 FAX.: (+264) 88626368
Main Project Team	**André Faul** **(**B.Sc. Zoology/Biochemistry); (B.Sc.(Hons) Zoology); (M.Sc. Conservation Ecology); (Ph.D. Medical Biosciences) **Johann Strauss** (BA. Geography/Psychology/Environmental Management)	
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1 INTRODUCTION

Votorantim Metals Namibia (Pty) Ltd (VMN or the Proponent) is a prospecting company registered in Namibia. Through the Ministry of Mines and Energy (MME), VMN has exclusive prospecting licenses (EPLs) across Namibia, with a focus on base, rare and precious metals.

The Proponent, received an "Intention to Grant" from the Ministry of Mines and Energy in respect of their application for EPL 10041 in the Okarukambe and Epukiro Constituencies of the Omaheke Region. The EPL will be granted to the Proponent upon successful acquisition of an environmental clearance certificate (ECC) for the EPL area, as indicated in Figure 1-1. The EPL is for base and rare metals, industrial minerals and precious metals. The EPL overlaps privately owned commercial farms and communal land used for agricultural purposes. The communal land included in the EPL is also part of the Epukiro Community Forest.

An ECC for the proposed exploration activities in the EPL area is required as per the Environmental Management Act, Act No. 7, of 2007 (EMA). The Proponent appointed Geo Pollution Technologies (Pty) Ltd (GPT), as independent environmental consultant, to assist with the necessary studies to determine the potential environmental impacts, and ultimately whether an ECC may be granted for this EPL. To achieve this, an environmental impact assessment (EIA) was undertaken to determine the potential positive and negative impacts of the Proponent's proposed exploration activities, on the environment. The EIA is accompanied by this environmental management plan (EMP) aimed at preventing or mitigating negative environmental impacts, while simultaneously promoting positive spinoffs from the project.

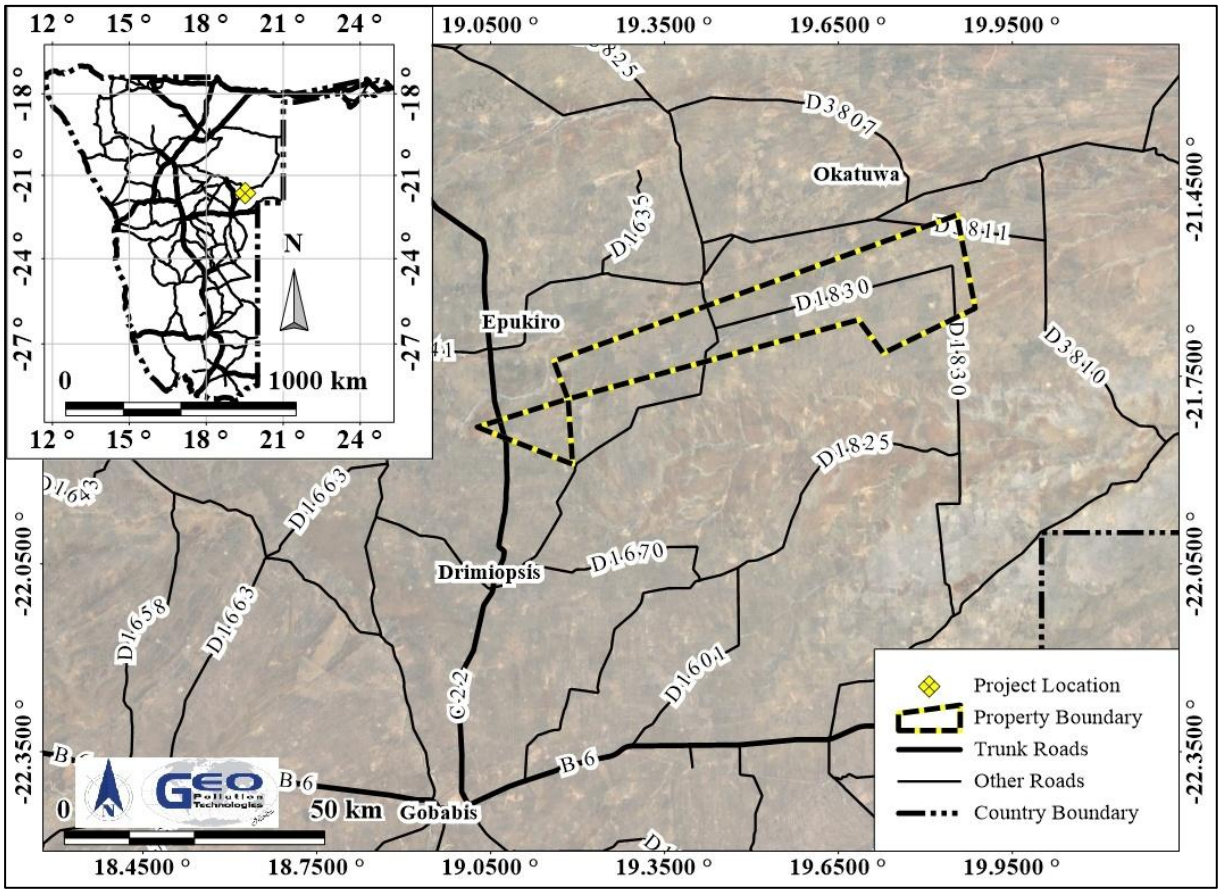

Figure 1-1 Project location

2 MANGEMENT OF IMPACTS

The purpose of this section is to present an EMP outlining preventative and mitigating measures, based on the identified impacts.

2.1 ENVIRONMENTAL MANAGEMENT PLAN

An EMP provides management options to ensure impacts of an activity are minimised. It is thus a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures may be included where necessary. The environmental management measures are provided in descriptions below. These management measures should be adhered to during the various phases of exploration. All personnel taking part in exploration should be made aware of the contents of this section, so as to plan and execute exploration in an environmentally sound manner.

The objectives of the EMP are:

- to include all possible activities of exploration;
- to prescribe the best practicable control methods to lessen the environmental impacts associated with exploration;
- to monitor and audit the performance of personnel in applying such controls; and
- to ensure that appropriate environmental training is provided to responsible personnel.

2.1.1 Planning Phase

Planning is not only limited to before the exploration phase is entered, but is ongoing throughout the validity of the awarded EPL. When planning to conduct exploration, it is the responsibility of Proponent to ensure all personnel and contractors are and remain compliant with all legal requirements and the provisions of the EMP. This includes ensuring that all required management measures are in place prior to and during exploration, to ensure potential impacts and risks are prevented or minimised. The management structure of the Proponent is presented in Figure 2-1.

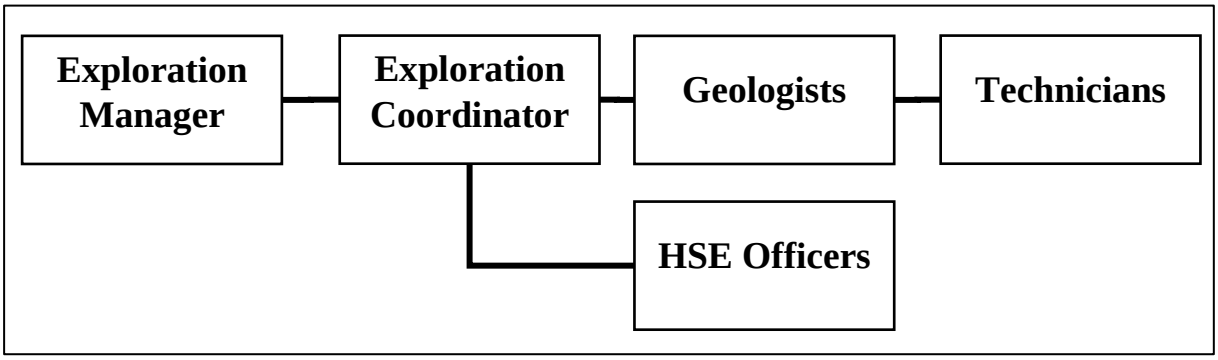

Figure 2-1 VMN organogram

The following actions are recommended for the planning phase and should continue during various other phases of the project:

2.1.1.1 Delegation of Responsibilities

- Make provisions to have a health, safety and environmental coordinator or similar to implement the EMP and oversee occupational health and safety as well as general environmental related compliance.
- Delegate EMP responsibilities to relevant personnel and contractors.

2.1.1.2 Risk Management and Emergency Response Preparedness

- Have relevant standard operating procedures and emergency response plans, equipment and personnel on site to prevent and deal with potential emergencies and incidents:

- Examples include health, safety and environment (HSE) manuals, site induction protocols, material safety data sheets, firefighting and evacuation plans and equipment, spill response plans, first aid training and first aid kits, etc.

2.1.1.3 Legal Compliance

- Compile an internal legal register outlining all required authorisations, permits and licences required to execute exploration activities.
- Comply with the various applicable acts and their respective regulations, for example pertaining to labour, income and other taxes and levies, work permits, etc.
- Ensure all necessary permits and authorisations from the various ministries, local authorities and any other bodies that govern exploration activities are in place and remains valid. These include the ECC, the EPL, drilling permits, permits for removal of protected trees (if required), exemption permits for storage of fuel, authorisations for aerial surveys, if any (helicopter, drone or aeroplane), etc.
- Apply for renewal of the ECC prior to expiry.

2.1.1.4 Surface Access Agreements

- Enter into agreements with the various land owners affected by the EPL and exploration activities. Such agreements should clearly stipulate the responsibilities of all parties involved, including restrictions pertaining to entry, movement and activities on the land, expectations of the land owner regarding rehabilitation once exploration activities cease, etc.

2.1.1.5 Employment and Contractor Appointments

- Ensure all appointed employees and contractors enter into an agreement with the Proponent, which among others include contractual adherence to the EMP. Ensure the contents of the EMP are understood by the employees contractors, sub-contractors and all personnel present or who will be present on explorations sites. This may require environmental training pertaining to the "value of nature" (why we need to protect the environment), explanation of various terminology, monitoring requirements, consequences of non-compliance, etc.

2.1.1.6 Rehabilitation and Pollution Clean-up

- If not already established, establish and maintain a fund/insurance for rehabilitation of the exploration sites, or for unforeseen events where environmental pollution occur which requires clean-up and/or remediation.

2.1.1.7 Community Liaison

- Appoint a community liaison officer and devise a community liaison strategy. Communicate his/her contact details, and the procedures for filing of complaints or providing feedback/input, to the affected land owners and other relevant stakeholders.
- Maintain a complaints register which details, among others, the date the complaint is received, the name and contact details of the person filing the complaint, the nature of the complaint, action taken to address and prevent future incidents of a similar nature, a copy of the feedback provided to the person filing the complaint.

2.1.1.8 Monitoring and Reporting

- Maintain an incidents register which detail, among others, the date the incident occurred, the names and contact details of persons involved in the incident, the nature of the incident, and action taken to address and prevent future incidents of a similar nature.
- Establish and / or maintain an environmental reporting system to report on environmental management procedures and incidents as outlined in the EMP.
- Submit environmental monitoring reports to the MEFT in compliance with the conditions linked to the ECC.

2.1.2 Employment

Appointment of consultants already realises during the planning phase. This include those responsible for permitting. During exploration, some contractors may be appointed to conduct specialised tasks. Local consultants, contractors and their employees, are thus supported, and their livelihoods sustained. Some aspects may require expertise not locally available, in which case foreign consultants or contractors may be used.

The Proponent appoints unskilled, semi-skilled and specialist employees to perform tasks related to exploration. This range from office administration to the highly specialised activities involved with in-field geological surveys and drilling. Employment are sourced locally, however specialised skills may not be locally available and may be sourced from outside of Namibia.

Desired outcome: To maximise the appointment of Namibian consultants, contractors and employees to contribute to a reduction in overall unemployment.

Actions

Enhancement:

- Employ local Namibians as far as practically possible.
- Appointment of foreign employees or contractors must be in line with the requirements of the Ministry of Home Affairs, Immigration, Safety and Security.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Labour Act
- Immigration Control Act
- Bi-annual summary report based on employee records with employee contracts, work permits, etc. on file.

2.1.3 Skills, Technology and Development

Development of people and technology are key to economic development. Exploration for mineral resources requires a workforce that ranges from highly specialised to general workers. Advanced exploration technologies are often used and training is provided to a portion of the workforce to be able to use these technologies and to perform certain tasks according to the required standards. Skills are periodically transferred to an unskilled workforce for general tasks. During normal exploration and related activities, employees will increase their work experience while some individuals may be identified for promotion and additional skills development and training.

Desired Outcome: To see an increase in skills of local Namibians, as well as development and technological advancements in the mining industry and local community.

Actions

Enhancement:

- If the skills and technology exist locally, contractors and employees must be sourced from Namibia. Deviations from this practice is justified where local or Namibian options are not available.
- Skills development and improvement programs to be made available to Namibians as identified during employee performance assessments. This increases their chances of being successful in job applications if no longer employed by the Proponent.
- Employees to be informed about parameters and requirements for references upon employment. The Proponent to issue reference letters or testimonials to employees, during their period of employment, to ensure they have proof of work experience and competence should they leave the company.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Record should be kept of any formal or informal training provided.
- Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- Bi-annual summary report based on records kept.

2.1.4 Contribution to the Economy

Mining and mining related activities attract foreign investment. The Proponent's exploration activities in Namibia have and will continue to generate revenue which is paid to the national treasury. Various consultants, contractors and employees are remunerated and various taxes, levies and fees are paid. This stimulates Namibia's economic development and promotes additional investments and business development.

At local scale, businesses in the area can benefit from the presence of the exploration team.

Desired Outcome: Contribution to the national treasury and economy

Actions

Enhancement:

- Procurement and maintenance of vehicles and machinery from the Namibian business sector.
- The Proponent must employ local Namibians and contractors where possible.
- Where available, engage with local businesses for the provision of goods and services.
- Adherence to all Namibian laws relating to the payment of taxes, levies, etc.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Bi-annual summary report based on employee and contractor records, procurement of goods and services, etc. on file.

2.1.5 Ideals and Aspirations for the Future

During the environmental assessment, pubic consultation was conducted with land owners and interested and or affected parties. Information shared with some of the parties resulted in a change in their aspirations for the future. This related to the possibility of additional revenue streams that may result from exploration activities and potentially mining. Such revenue streams included the provision of services to the exploration team, e.g. accommodation, or being employed by the Proponent. The possibility of exploration in the area also resulted in a negative impact on the ideals and aspirations of the land owners where they felt exploration, and possibly future mining, may negatively impact their livelihoods by reducing their farmable land.

Ideals and aspirations of employees are also considered. Poor communication between management and employees may lead to uncertainty in with regard to job security and options for promotion.

Desired Outcome: Continued sharing of accurate and easily understandable information, planned activities, project progress and opportunities with land owners, IAPs and government agencies. Maintaining an open door policy with land owners and IAPs.

Actions

Enhancement:

- Information sharing about the proposed project to explain in laymen's terms all proposed activities, timelines, potential impacts, potential benefits (opportunities), etc. The public consultation phase of the environmental assessment process was the first step in information sharing.
- Major changes in proposed exploration activities should be made available to land owners, government agencies and interested and affected parties.
- Open communication regarding future exploration activities, opportunities and employment with both land owners and employees.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Up to date stakeholder database
- Records kept of all information shared with authorities, neighbours and employees.

2.1.6 Demographic Profile and Community Health

The scale of the exploration project is limited and it is not expected to create a change in the demographic profile of the nearby local communities. Where possible, existing labour, already employed by the Proponent will be used or new labourers will be sourced from a nearby town, or possibly from the land owners. Community health may be exposed to factors such as communicable disease like HIV/AIDS and tuberculosis (TB) and social ills or deviant behaviour like alcoholism/drug abuse, associated with increased spending power of the labour force. Similarly, workers from the exploration team may visit farm labourer compounds, and vice versa, and this may further expose both groups to the same social ills and diseases. Incidences of theft may occur and this may also be when criminals pose as employees of the exploration team present in the EPL area.

Positive impacts will relate to employees and contractors' increased economic resilience and improved livelihoods.

Desired Outcome: To prevent the in-migration and growth in informal settlements and to prevent the spread of communicable diseases and prevent / discourage socially deviant behaviour and criminal activities.

Actions:

Prevention:

- Thorough background checks and testimonials when appointing new employees.
- Provide educational programmes / information sessions for employees on various topics of health, social behaviour, etc., including communicable diseases, financial management and general upliftment of employees' social status.
- Clearly stipulate restricted activities when working within the EPL. Include any such activities stipulated in surface access agreements.
- Provide time schedules, names and vehicle registration numbers to land owners well in advance (and any other information as per the surface access agreement). Communicate any changes to land owners.
- All employees to wear easily distinguishable uniforms/clothing, with name tags that can be checked against the provided list of employees who will be present on the land.
- Inform land owners of each arrival onto and each departure from the land.
- No movement out of areas pre-arranged with the landowner.
- In the event that the exploration team must make use of a temporary camp for accommodation on any privately owned land, adhere to the following:
    - Provide adequate sanitary and ablution facilities.
    - No unauthorised visitors to be allowed at exploration sites and camps.
    - Employees to stay at the camp and authorised areas and no wandering outside of these or visits to nearby workers' compounds.
    - All waste to be contained and removed from site to ensure hygienic conditions.
- Where contractors are required, ensure they are reputable and will strictly implement and follow the same measures as stipulated for the Proponent's team.

Mitigation:

- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Surface access agreements
- Company policies, procedures and rules
- For temporary camps, regularly completed inspection sheets, for all areas which may present environmental health risks, must be kept on file.
- Bi-annual summary report based on educational programmes and training conducted.

2.1.7 Health and Safety

Various activities associated with exploration are reliant on physical human labour, in the outdoors, and the operation of machinery. Therefore health and safety risks exist. Such risks include exposure to environmental elements extreme heat or cold, sunstroke, dehydration, trips and falls, vehicle accidents, getting caught in moving parts of machinery, cuts, exposure to hazardous chemicals (e.g. hydrocarbons) and encounters with wild, potentially dangerous, animals.

The EPL is remote and Epukiro only has a basic clinic. The nearest proper medical facilities are located in Gobabis.

Desired Outcome: To prevent injury and health impacts

Actions

Prevention:

- Implement and maintain an integrated health and safety management system.
- All health and safety standards specified in the Labour Act should be complied with.
- Ensure that all personnel receive adequate training on operation of equipment / handling of hazardous substances (mainly hydrocarbons – fuel, hydraulic fluid, etc.) and all drivers are appropriately licenced.
- All employees and visitors to the exploration areas must receive appropriate induction prior entry.
- Provide all employees with required and adequate personal protective equipment (PPE) and training in the proficient use thereof. This should include clothing and sunscreen to prevent sunburn or heatstroke.
- Ensure sufficient potable water is available to all workers at all times and remind employees to stay hydrated, especially in warm summer months.
- To prevent unauthorised entry, temporary camp and drill sites must be fenced off.
- Place and securely stow all heavy equipment (e.g. drill rods and casing) to prevent objects toppling over or falling on employees. Demarcate potentially dangerous areas like the drilling fluid sumps.
- No alcohol or recreational drugs should be allowed on site and no personnel should operate equipment under the influence of any drugs, including medicine that cause drowsiness and impaired judgement.
- Maintain all equipment and vehicles in good working order to minimise the risk of accidents (e.g. replacing of worn vehicle tyres, replacing damaged drill rods, etc.)
- Staff should be educated / trained on human wildlife conflict management and be informed not to approach wild animals and to be vigilant for, and not to confront (attempt to kill or catch), snakes or other potentially venomous / dangerous animals.
- Regular checks for sand tampans and ticks and wearing of repellents and clothing to prevent them from attaching.

Mitigation:

- Selected personnel should be trained in first aid and a first aid kit must be available on site. This should include for example snake identification and handling of snake bites.
- The contact details of all emergency services must be readily available and a satellite phone must be available if areas with no cellular reception is entered.
- In case of any injury or illness, first aid should be applied and the employee transported to a medical facility if required.
- For serious injuries, emergency services should be contacted for evacuation to the nearest emergency facility.
- All personnel with known medical conditions must keep their own medicine nearby at all times. This includes treatment for severe allergies to for example bee stings.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Any health and safety incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained

2.1.8 Security

Security risks will be related to unauthorised entry into temporary exploration camps, theft and sabotage. Similarly, the presence of foreign workers in the area may expose the land owners to security issues such as theft (e.g. poaching, stock theft). Criminals may take the opportunity to pose as exploration team workers in order to access the areas.

Desired Outcome: To prevent deviant and criminal behaviour such as theft.

Actions

Prevention:

- Thorough background checks and testimonials when appointing new employees.
- Clearly stipulate restricted activities when working within the EPL. Include any such activities stipulated in surface access agreements.
- Provide time schedules, names and vehicle registration numbers to land owners well in advance (and any other information as per the surface access agreement). Communicate any changes to land owners.
- All employees to wear easily distinguishable uniforms/clothing, with name tags that can be checked against the provided list of employees who will be present on the land.
- Inform land owners of each arrival onto and each departure from the land.
- No movement out of areas pre-arranged with the landowner.
- Prior to entering an EPL, confirm with the land owner which gates should be left open and which should be closed.
- Where contractors are required, ensure they are reputable and will strictly implement and follow the same measures as stipulated for the Proponent's team.

Mitigation:

- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.
- Vehicles accessing farms could be fitted with trackers and dash cams to allow the Proponent to investigate any complaints made by landowners about unauthorised movement and incidents on their land.
- Report any suspected "out of the ordinary" sightings such as dead animals (suspected poaching), open gates, suspicious persons, etc. to the land owner.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Surface access agreement
- Any incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents reported and action taken.

2.1.9 Vehicle Movement

Exploration activities occur on farmland, thus traffic impacts on public roads will be limited to the occasional movement of vehicles to and from the EPL when exploration is performed. This can include slow moving drill rigs. The impact on public roads are expected to be minor.

Although only a few vehicles will access private roads in the EPL area, such as on privately owned farms, it may constitute a significant increase in traffic compared to the status quo. Potential impacts include dust, noise, running over or collisions with wildlife and livestock, stressed wildlife, and damage to roads, especially when it rains and road surfaces are wet.

Desired Outcome: Minimum impact on traffic on public roads, no transport or traffic related incidents, impacts and disturbances on privately owned land/roads

Actions

Prevention:

- All drivers of vehicles must have valid drivers' licences appropriate for the vehicle driven and be trained in off-road driving.
- All vehicles to be roadworthy and appropriately licensed.
- If significant traffic impacts are expected on public roads, possibly as a result of slow moving drill rigs, traffic management should be performed.
- Implement speed limits on farm roads to minimise dust and noise and to prevent running over or collisions with wildlife or livestock. For roads near residences or livestock enclosures, and for very dusty roads, speed can further be reduced.
- All drivers should be vigilant for any wildlife near or in roads to prevent running over or collisions with wildlife and livestock.
- Maintain all vehicles' in good mechanical condition to ensure they do not produce excessive noise.
- For sandy areas, engage four-wheel drive and reduce tyre pressure to prevent unnecessary wheel spin and damage and corrugation of roads.

Mitigation:

- Repair any damaged roads.
- Report any collisions with livestock or wildlife to the land owner.
- Vehicles accessing farms could be fitted with trackers and dash cams to allow the Proponent to investigate any complaints made by landowners about unauthorised movement and incidents on their land.
- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Any complaints received regarding vehicle movement should be recorded together with action taken to prevent impacts from repeating itself.
- A bi-annual report should be compiled of all incidents reported, complaints received, and action taken

2.1.10 Noise

Noise related to exploration activities is mainly limited to vehicle movement, aerial surveys and exploration drilling. Helicopter, aeroplane or drone technology used for aerial photography or geophysical surveys, will introduce noise unfamiliar to wildlife and livestock, especially at low altitude flying.

Desired Outcome: To prevent any hearing loss among employees and not to be a nuisance or cause stress in wildlife and livestock.

Actions

Prevention:

- Follow Health and Safety Regulations of the Labour Act on maximum noise levels to prevent hearing impairment of employees, specifically if drilling is conducted.
- All vehicles and machinery must be regularly serviced to ensure minimal noise production. This include fitting noise dampers on for example compressors used for reverse circulation drilling.
- Exploration activities should only be conducted in daytime, during weekdays, unless otherwise arranged with the land owner.
- If helicopters, drones or aeroplanes are used for aerial surveys, it should be performed at times agreed upon with the land owner
- Helicopter, drone or aeroplane surveys must be performed for the minimum time possible, and as high above the ground as possible, while still ensuring good quality data.
- Noise dampers to be fitted on machines where suitable and alternative signalling adopted where possible.
- For vehicle noise also refer to section 2.1.9.

Mitigation

- Personnel working in noisy environments must be issued with hearing protectors, specifically if drilling is conducted.
- Where helicopters, aeroplanes or drones cause distress in animals, operations should cease until they have moved away, before it can continue.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Health and Safety Regulations of the Labour Act, Civil Aviation Act
- Surface access agreement.
- Maintain a complaints register.
- Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences

2.1.11 Fire

Fires outside of designated areas and discarded cigarettes can cause veld fires which can quickly spread and get out of control. Similarly, machinery can ignite dry vegetation if sufficient heat (e.g. exhaust pipes) or sparks are produced. Fuels stored and used for exploration activities may be flammable. Veld fires originating elsewhere (e.g. lightning) can pose a threat to the exploration teams.

Desired Outcome: To prevent fires causing property damage, loss in vegetation, possible injury caused by uncontrolled fires.

Actions:

Prevention:

- Prepare a holistic fire protection and prevention plan. This plan must include an emergency response plan and a firefighting plan.
- Personnel training (safe operational procedures, firefighting, fire prevention and responsible housekeeping practices).
- All vehicles to be fitted with fire extinguishers and have equipment to specifically fight veld fires available.
- For drilling sites and if temporary camps are used:
    - Maintain regular vehicle and machinery mechanical and electrical inspections and maintenance.
    - Ensure all flammable chemicals are stored according to material safety data sheet (MSDS) and SANS instructions and all spills or leaks are cleaned up immediately.
    - Have serviced firefighting equipment within easy reach, including those used to fight veld fires.
    - Fire used for purposes such as cooking must only be allowed within designated areas far removed from any flammable material such as dry vegetation.

Mitigation:

- Implement the fire protection and firefighting plan in the event of a fire.
- Quick response time by trained staff will limit the spread and impact of a fire.
- Communication methods (e.g. satellite phones where cellular phone reception is limited) must be available at all times for rapid communication with the land owner and surrounding farmers to immediately be able to notify them of a fire. A rapid response to a veld fire is crucial in bringing it under control and extinguishing it as soon as possible.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A register of all incidents must be maintained on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested and training given

2.1.12 Visual

Activities that may have a visual impact are exploratory drilling, the associated roads leading to drill sites, and possible erosion where vegetation is cleared. Rehabilitated drill sites and cleared areas takes time to recover to such an extent that it is no longer visible, and are prone to erosion. Newly drilled boreholes are distinctly visible due to the vegetation clearing and waste rock usually associated with such sites. Borehole casing protruding from the ground also has a visual impact. Numerous drill sites will thus alter the landscape character. In addition newly drilled sites are often uniquely visible from the air and on open source satellite imagery due to the presence of drill cuttings and dust. Such changes may affect receptors which are reliant on the existing landscape character (such as tourism).

Desired Outcome: To minimise potential visual impacts and changes to the landscape character

Actions

Mitigation:

- At the drill site, regular waste disposal and good housekeeping will ensure a low visual impact.
- Drill sites should be sufficiently rehabilitated. All drill cores as well as cuttings with a significantly different colour than the surface soil should be removed from site. Other cuttings can be dispersed around the site and loosely raked to limit the visual impact.
- Stored topsoil should be returned and spread over the site to speedup re-establishment of vegetation.
- Compacted soil must be ripped along contour and not down slope. This will loosen soil, promote water infiltration, aid re-vegetation and limit soil erosion.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A report should be compiled of all complaints received and actions taken.
- Maintain a photo log for comparison of all exploration (drill) sites prior to entry by the drill team and after rehabilitation is completed.

2.1.13 Soil, Surface Water and Groundwater

Groundwater is the only source of potable water within the EPL area. Infiltration of as much uncontaminated precipitated water is greatly desired so as to recharge groundwater resources. Care must thus be taken to avoid contamination of soil and surface water. No known permanent surface water sources are present within the EPL area. Pollution in dry riverbeds may however result in downstream and groundwater pollution when they flow during rainy seasons.

Contamination of the groundwater can occur via polluted water infiltrating through sediments or through fractures, joints and faults that are present in the subsurface. Soil contamination can occur from chemical and hydrocarbon spills during refuelling, during maintenance of equipment and machinery, or if mobile fuel tanks (bowsers) are involved in accidents on route to drill sites. Hydraulic oil leaks are common on drilling rigs and pipe bursts may release oil into the environment. Contamination of groundwater could also occur through infiltration of waste from field toilets. This is specifically applicable to exploration camp sites.

Soil may further become compacted or disturbed (powdered) as a result of heavy motor vehicles and equipment and this affects soil quality and may lead to excessive erosion. Similarly, although very few steep sloped areas are present within the EPL, clearing of slopes greater than 12.5° may present a greater erosion risk.

Drilling of exploration holes may penetrate a confining aquifer layer (aquitard). This may cause mixing of aquifer water where the one aquifer may contain water of a poor quality, causing contamination of the aquifer having better quality. An alternative impact may be the leaking of water from one aquifer into another, causing existing boreholes to dry up or springs to dry up. Based on the limited amount of information available, it is not expected that such impacts would occur within the project area. It would however be advisable to take care during drilling that proper monitoring is taking place to evaluate for such conditions and that appropriate remedial actions be implemented where needed – the precautionary principal should be applied.

Desired Outcome: To prevent the contamination of soil and water

Actions

Prevention:

- Training of operators of machinery and vehicles and employees must be conducted on a regular basis (responsible driving, fuel and chemical handling, spill detection, spill control).
- All machinery and vehicles should be properly maintained to be in a good working condition with no leaks and reduced possibilities of pipe bursts/breakages.
- Employ drip trays and spill kits when leaks are detected or servicing / repairs of equipment is needed.
- The contents of mobile chemical toilets must be removed from site and disposed of at a registered waste water treatment plant.
- Limit movement to existing roads as far as is practically possible.
- Limit interference with drainage lines.
- Where drill sites are levelled to create drill pads and campsites, topsoil must be stored for rehabilitation purposes after drilling is complete and the site is decommissioned.
- If land clearing is required in areas with a slope greater than 12.5°, mitigation measures should be employed to prevent erosion and formation of gullies. All mitigation measures to be agreed with the land owner.

Mitigation:

- Any fuel spillage of more than 200 litre must be reported to the Ministry of Mines and Energy.
- Spill clean-up means must be readily available on site as per the relevant MSDS and any spill must be cleaned up immediately to prevent it from reaching sensitive receptors.
- Hazardous waste must be contained and disposed of at a suitably classified hazardous waste disposal facility.

- Rehabilitate areas where soil or drainage lines are disturbed.
- Compacted areas can be lightly ripped and contoured to encourage vegetation establishment and to get rid of tracks.
- After exploratory drilling is complete, the boreholes must be handled according to the drill permit conditions. Where such conditions are lacking, boreholes should either be backfilled or secured with a steel or unplasticized polyvinyl chloride (uPVC) casing equipped with a secure cap. Drill cuttings should not be used for backfilling boreholes as minerals in the cuttings may have oxidised and will then potentially be released into the groundwater, together with salts present in the cuttings. Clean sand or clay should be used where possible.
- Backfilling or closing of the boreholes should be performed to avoid organisms from falling into the boreholes and to prevent surface runoff from contaminating the groundwater, where the borehole will form a preferential flow path if not properly sealed.
- Boreholes should be cemented where boreholes intersect confining layers separating aquifers with different water quality or causing artesian conditions.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Maintain MSDS file for hazardous chemicals.
- Maintain a photo log for comparison of all exploration (drill) sites prior to entry by the drill team and after rehabilitation is completed
- Report all spills or leaks to management and immediately initiate clean-up.
- Maintain a register of all incidents on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.

2.1.14 Ecosystem and Biodiversity

Some exploration activities are intrusive in nature, although mostly with relatively low impact. New roads may be required to allow machinery to be moved to exploration targets and drill sites will need clearing. Employees involved with exploration may be involved with poaching and illegal collection of plant and animal materials. Poachers may also use the presence of exploration teams on farms, to pose as members of the team, in order to poach. Impacts may also be related to pollution of the environment. Human / wildlife interactions further present a risk to both the wildlife and the people involved.

Disturbed sites are prone to the rapid establishment of invasive plants.

Desired Outcome: To prevent poaching, ecological damage and pollution

Actions.

Prevention:

- Educate all contracted and permanent employees on the value of biodiversity and the importance of protecting the environment from disturbance.
- Where possible, removal of trees, especially protected species and large trees, must be avoided. The necessary permits from the Directorate of Forestry of the MEFT must be obtained for removal of all protected species.
- Liaise with the land owner on routes to be followed where new roads should be made and whether such roads should be rehabilitated after exploration ends or be left as is for the owner's use.
- Areas to be cleared must first be inspected for nests and burrows and these should be avoided.
- Strict conditions prohibiting harvesting and poaching of fauna and flora should be part of employment contracts. This includes prohibitions or regulations on the collection of firewood.
- Procedures to deal with human-wildlife conflict should form part of employee training/induction. The unwarranted killing of potentially dangerous animals, or those perceived as dangerous, or animals typically feared due to superstitious reasons, should be strongly discouraged.
- The footprint of drill sites, their associated laydown areas and access routes, should be kept to the smallest area possible and movement of vehicles outside of these area must be prohibited.
- Where drill sites are levelled to create drill pads, topsoil (overburden) must be stored for rehabilitation purposes after drilling is complete and the site is decommissioned.
- Exploration equipment transferred from completely different habitats to the EPL area must be thoroughly cleaned to limit the potential transfer of alien species to the area.
- Restrict driving to designated areas and avoid off-road driving.

Mitigation:

- Report any extraordinary animal sightings, conflict or incidents to the farm owner and MEFT.
- Report any suspicious people or dead animals, snares or traps encountered during exploration to the land owner.
- Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts from pollution.
- At campsites, prevent scavenging of any waste by fauna.
- Disciplinary actions to be taken against all employees failing to comply with contractual conditions related to poaching and the environment.
- Compacted areas can be lightly ripped to encourage vegetation establishment and to get rid of tracks.
- Topsoil should be returned to such sites in order to re-establish the seed bank.
- Alien invasive species should be eradicated from drill sites during follow-up visits to rehabilitated areas.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Forestry Act regulations
- Invader species eradication to be reported on.
- All information and reporting to be included in a bi-annual report.

2.1.15 Dust

Dust may be generated as a result of vehicles travelling on gravel roads, strong winds picking up dust in cleared areas, due to the specific drilling methods, only limited dust as a result of drilling.

Desired Outcome: To prevent any nuisance or health impacts as a result of dust.

Actions

Mitigation:

- Responsible driving speeds on gravel roads will limit dust generation.
- Road surfaces that become powdered due to heavy equipment must be rehabilitated to reduce dust.
- Dust masks as standard PPE for workers in situations with excessive dust.
- Implement dust suppression measures where possible and especially at drill sites close to public roads, if needed

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Health and Safety Regulations of the Labour Act
- Maintain a complaints register.
- Bi-annual reporting on complaints and actions taken to address complaints and prevent future occurrences.

2.1.16 Waste

Various forms of waste will be produced during exploration activities. Waste may include hazardous waste associated with hydrocarbon products and chemicals, including soil and water contaminated with such products. Domestic waste will be generated by the workers. Sewage in chemical toilets will be produced. Waste presents a contamination risk and when not removed regularly may become a health and / or fire hazard and attract wild animals and scavengers. Due to the potential visual difference between drill cuttings and drill cores and the natural soil cover, it may be regarded as a type of waste.

Desired Outcome: To reduce the amount of waste produced, and prevent contamination, pollution and littering.

Actions

Prevention:

- Develop a waste management plan and educate workers on the importance of proper waste management.
- Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate.
- Ensure adequate waste storage facilities are available that will prevent waste from being blown away by wind or being scavenged (human and non-human) or attract vermin.
- Hazardous wastes such as used oil and oil/diesel contaminated soil or water must be contained.
- In the unlikely event of a french drain being erected for employees, it should adhere to the Department of Water Affairs' guideline documents for the siting and construction of such facilities.

Mitigation

- All waste must be removed from the drill sites and camps once drilling is complete. Waste should be disposed of at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers (e.g. oil containers) and contaminated materials (rugs, paper water and soil). Empty chemical containers must be destroyed in a way that would prevent reuse as a container after disposal.
- All drill cores as well as cuttings with a significantly different colour than the surface soil should be removed from site. Other cuttings can be dispersed around the site and loosely raked to limit the visual impact.
- Contents of chemical toilets must be removed from site and disposed of at a registered waste water treatment facility.

Responsible Body:

- Proponent
- Contractors

Data Ssources and Monitoring:

- A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- Any complaints received regarding waste should be recorded with notes on action taken.
- All information and reporting to be included in a bi-annual report.

2.1.17 Heritage Resources

Within the EPL, the chance of discovering of archaeologically or culturally important artefacts is very small. This is due to the overall lack in surface features, such as rocky hills and springs, that are typically associated with early human habitation. Should archaeologically or culturally important artefacts be discovered (e.g. unmarked graves, signs of early human habitation), it will have a positive academic value if preserved, but a negative impact if damaged.

Desired Outcome: To prevent the damage to, or destruction of, any archaeological, paleontological or culturally important (heritage) resources.

Actions

Prevention:

- Educate employees and contractors on what constitutes a possible heritage or archaeologically significant find and inform them to be vigilant for any extraordinary finds and to prevent any damage.

Mitigation:

- If and site or any other archaeologically important artefact is found during exploration, the "chance find procedure" must be implemented. In short, any work in that area must be halted, the area demarcated and the National Heritage Council informed.
- For any human remains, the Namibian Police must be informed as a first action.
- Work may only resume once the necessary permission is provided by the National Heritage Council.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Documenting and reporting of any incidents related to heritage, archaeological or paleontological resources.

2.1.18 Utilities and Infrastructure

Any damage caused to existing infrastructure and like fences, reservoirs, troughs, roads, etc. This includes damage/erosion of farm roads due to the movement of heavy machinery such as drill rigs to exploration sites. Borehole casings that becomes overgrown can present a danger to land owners if they drive off road and collide with it. This is not likely to happen as the EPL is very densely vegetated, making off-road driving nearly impossible.

Desired Outcome: No impact on utilities and infrastructure.

Actions

Prevention:

- The Proponent must determine exactly where infrastructure like pipelines are situated. Liaison with owners of the land or suppliers of services (if applicable) is essential.
- Damaged farm roads and associated erosion ditches must be repaired in accordance with pre-arranged agreements with the land owner. The use of drill cuttings for this purpose should be considered as this will also serve as drill site rehabilitation.
- The land owner must be informed of the exact positions of any borehole casings protruding above the ground.

Mitigation:

- Emergency procedures for corrective action available on file.

Responsible Body:

- Proponent
- Contractors
- Land owner or suppliers of services

Data Sources and Monitoring:

- A report should be compiled of all incidents that occurred and corrective action taken.

2.2 ENVIRONMENTAL MANAGEMENT SYSTEM

The Proponent could implement an environmental management system (EMS) for their operations. An EMS is an internationally recognized and certified management system that will ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS would need to include the following elements:

- A stated environmental policy which sets the desired level of environmental performance;
- An environmental legal register;
- An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- Identification of environmental, safety and health training needs;
- An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy;
- Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS; and
- The EMP.

3 CONCLUSION

The EMP should be used as an on-site reference document during exploration. Parties responsible for transgressing of the EMP should be held accountable according to the Proponent's standard procedures for handling of misdemeanours. The Proponent should use an in-house health, safety, security and environment management system, or similar, in conjunction with the EMP. All exploration personnel and contractors must be taught the contents of these documents.

Should the MME and Directorate of Environmental Affairs (DEA) in the MEFT find that the impacts and related mitigation measures, which have been proposed in this report, are acceptable, the necessary authorisations and ECC may be granted to the Proponent. The ECC issued, based on this document, will render it a legally binding document which should be adhered to.