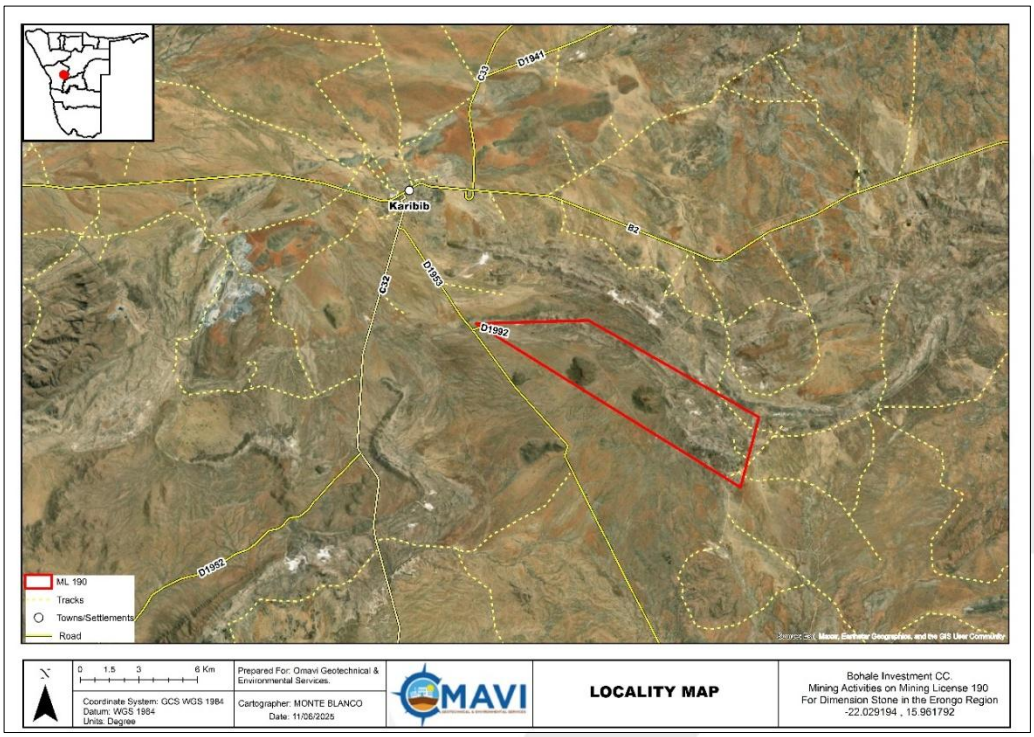
P.O. Box 1642 Windhoek
info@omavi.com.na
+264 81 478 6303
+264 81 214 3721

ENVIRONMENTAL MANAGEMENT & REHABILITATION PLAN (EMRP)



TO

Support RENEWAL APPLICATION for the Environmental Clearance Certificate (ECC): The Mining of Dimension Stone (Marble) on Mining License (ML) 190 and Ongoing Exploration Activities in the Karibib District, Erongo Region

PREPARED BY:	OMAVI Geotechnical & Environmental Services P.O Box 1642, Windhoek Email: info@omavi.com.na Tel: +264 814786303
PREPARED ON BEHALF OF:	Bohale Investment (Pty) Ltd P. O. Box 4676 Walvis Bay Namibia
ECC APPLICATION NUMBER:	APP- **005934**
DATE SUBMITTED:	June 2025
DOCUMENT VERSION:	**DRAFT as required by Reg 8j of 2012 EIA Regulations**
COPYRIGHT:	*This report and the information it contains are subject to copyright and may not be reproduced or copied in whole or part without the written consent of the authors.*

Declaration of authorship

APPLICATION NUMBER: APP-005934

Project Title:

RENEWAL OF ECC for the Mining of Dimension Stone (Marble) on Mining License (ML) 190 and ongoing brownfield exploration activities in the Karibib District, Erongo Region - Namibia

---

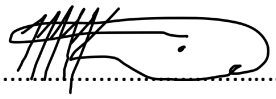
I Etuna Kanime (full name of Environmental Assessment Practitioner - EAP) understand and agree that the information I have furnished in this submission will be reviewed by the Office of the Environmental Commissioner (OEC). I accept that the Environmental Commissioner, will hold me accountable in terms of Section 43(1)(b) of the Environmental Management Act, Act No. 7 of 2007 for any inaccurate or misleading information knowingly provided in the following documentation.

Tick the box (es) applicable to your submission:

- ☐ Pro Forma Environmental Contract for Mining Claim(s)
- ☐ Environmental Questionnaire For Mining
- ☐ Scoping report
- ☐ Environmental Impact Assessment (EIA)
- ☒ Environmental Management Plan (EMP),
- ☐ Consent from Relevant Authority

I certify, and, acknowledge that the provision of such information will impede the lawful carrying out of the duties, responsibilities and functions of the Environmental Commissioner. I declare that the information submitted is my own work. All direct or indirect sources used are acknowledged as references.

Consultancy Name: OMAVI GEOTECHNICAL & ENVIRONMENTAL SERVICES

EAP Signature: 

Date: 18 JUNE 2025

NB- To be submitted jointly with Scoping Report, EIA, EMP documents to the Office of the Environmental Commissioner

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

LIST OF ABBREVIATIONS

CFP:	Chance Finds Procedure
DEAF:	Department of Environmental Affairs and Forestry
EAP:	Environmental Assessment Practitioner
ECC:	Environmental Clearance Certificate
ECO:	Environmental Control Officer
EHS:	Environmental, Health and Safety
EIA:	Environmental Impact Assessment
EMA:	Environmental Management Act
EMP/EMRP:	Environmental Management Plan / Environmental Management & Rehabilitation Plan
EPs:	Equator Principles
ESA:	Environmental and Social Assessment
HSE:	Health Safety and Environmental
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
ML:	Mining License
MSDS:	Material Safety Data Sheets
NHC:	National Heritage Council
OEC:	Office of the Environmental Commissioner (OEC)
OHS:	Occupational Health and Safety
PM10 & PM2.5:	Particulate matter of 10 (or 2.5) micrometres or less in diameter
PPE:	Personal Protective Equipment
PRO:	Public Relations Officer
RBS:	Risk-Based Solutions CC
SME:	Small and Medium Enterprise

LIST OF ANNEXURES

Annexure 1: Archaeology Chance Finds Procedure (CFP) Guide

Annexure 2: The Copy of the Expired Environmental Clearance Certificate (ECC) No. 0991

DISCLAIMER

OMAVI Consultants are not replicating the 2020 EMP by Risk-Based Solutions (RBS) CC[1] but are only updating the information, where applicable (with credit given throughout this document). The update (as required) is aimed at informing the Environmental Commissioner of the status of the project activities and if there have been any significant changes (between the 13th of October 2020 and 13th of October 2023 when the CC was valid) that may trigger amendments or need to be reported in the ECC renewal EMP and provided for in the new ECC for the next 3 years.

1 INTRODUCTION

This document serves as a guiding document to ensure that the project complies with environmental regulations and minimizes its negative ecological and social impacts. It is typically required as part of the Environmental Impact Assessment (EIA) process as stipulated by the EMA Act of 2007. The EMRP has been compiled based on the EMP compiled by Risk-Based Solutions Consultants in 2020.

1.1 Objectives of the EMP (herein referred to as the EMRP)

The primary objective of this report is to ensure that the project is implemented in an environmentally sustainable and socially responsible manner. These objectives align with regulatory requirements and best practices for minimizing the negative environmental impacts.

Key Objectives of the EMRP

Ensure Environmental Compliance: Adhere to national and international environmental regulations, policies, and standards. Secure the necessary environmental permits and approvals before project implementation.

Identify and Mitigate Negative Environmental and Social Impacts: Assess the potential environmental risks associated with the project activities (e.g., habitat destruction, soil erosion, water usage, waste generation) and propose mitigation measures to reduce negative impacts and enhance positive outcomes.

Promote Sustainable Development: Ensure that the project contributes to national development goals while maintaining environmental sustainability, and support local communities by involving them in the project and addressing their concerns and ensuring minimal disruption to their livelihoods.

Establish Monitoring and Management Programs: Establish monitoring programs to track the effectiveness of mitigation measures and provide guidelines for regular environmental audits and reporting requirements.

[1]Risk-Based Solutions. (2020). Final Environmental Management Plan (EMP) Report for Mining License (ML) No. 190, Karibib District, Erongo Region West-central, Namibia. Windhoek. Ministry of Environment, Forestry and Tourism (MEFT) ECC Application Reference No. APP-001567.

Enhance Stakeholder Engagement and Public Participation: Ensure that communities, government agencies, and other stakeholders are informed and involved in decision-making and address stakeholder concerns transparently.

Ensure Occupational Health and Safety (OHS) Compliance: Integrate health and safety measures to protect workers during the mining and exploration activities.

Guide the Decommissioning and Rehabilitation Process of disturbed site areas (owing to the cessation of mining activities upon depletion of economically feasible ore deposit) to ensure site restoration to minimize long-term environmental degradation.

The summarized objective of the EMP, according to Risk-Based Solutions (2020), the EMP provide a detailed plan of actions required in the implementation of the mitigation measures for minimising and maximising the identified negative and positive impacts, respectively. The EMP also provides the management actions with roles and responsibilities requirements for the successful implementation of environmental management strategies by Bohale Investment.

1.2 Assumptions and Limitations of the EMRP

This EMRP was developed based on the following assumptions and limitations, which must be acknowledged to understand the scope and applicability of the document.

Assumptions of the EMP

Accuracy of baseline data: The report assumes that the environmental baseline data collected (e.g., soil conditions, biodiversity, climate, and hydrology) during the EIA Study carried out in 2020 is accurate and representative of the project area and is based on existing studies, site surveys, and remote sensing data.

Compliance with regulatory requirements: It is assumed that the project will follow all environmental laws, permits, and policies set by national and international authorities because the effectiveness of the EMRP depends on strict enforcement by regulators and project developers.

Implementation of mitigation measures: The EMRP assumes that all mitigation and management strategies to mitigate potential adverse/negative impacts will be properly implemented as outlined. The project team is expected to allocate resources and personnel to execute these measures effectively.

Stakeholder cooperation: The report assumes that local communities, government agencies, and project stakeholders will cooperate and provide input during implementation and that engagement efforts are assumed to be sufficient to address stakeholder concerns and prevent conflicts.

Technological and operational stability: The EMRP assumes that the project and associated infrastructure will operate as expected, with minimal deviations from final design specifications.

Uninterrupted project timeline: The EMRP is based on an estimated project timeline that assumes no significant delays due to external factors (e.g., legal disputes, financial constraints, or unforeseen environmental conditions).

Limitations of the EMRP

Data gaps and uncertainties: Seasonal variations in environmental conditions (e.g., water availability, biodiversity presence) may not be fully captured, and some impacts may only become evident over time, making it difficult to predict long-term effects with certainty.

Changes in legislation and policies: Future modifications in environmental laws or regulations may render parts of the EMRP outdated. Compliance requirements could change, requiring updates or additional approvals.

Effectiveness of mitigation measures: While mitigation measures are designed based on best practices, their effectiveness may vary due to site-specific conditions or unforeseen challenges. Adaptive management may be necessary to refine strategies over time.

External environmental and socioeconomic factors: Unpredictable events, such as natural disasters (e.g., floods, wildfires), could affect project implementation and impact mitigation efforts. Economic or political instability may disrupt project execution or limit resources available for EMRP implementation.

Limited scope of assessment: The EMRP primarily focuses on direct environmental impacts but may not fully assess indirect or cumulative impacts from nearby projects or regional developments. It may not consider long-term ecological succession or changes beyond the project area.

Dependence on stakeholder commitment: The success of the EMRP depends on stakeholder engagement and enforcement, which may be influenced by changing priorities or a lack of funding. If stakeholders do not adhere to their assigned responsibilities, the effectiveness of the EMP could be compromised.

Noted: It should be noted that the EMP is a living document and can be amended and updated as deemed necessary throughout the project life cycle.

1.3 About the ECC Holder and ECC Renewal Applicant

Bohale Investment (Pty) Ltd is a sister company of BC Stone Products (Namibia) (Pty) Ltd and Best Cheer Investments Namibia (Pty) Ltd. The Group of companies currently operates several quarries and two stone processing plants in Karibib and Walvis Bay, and has made significant investments in the Namibian economy and in particular the Erongo Region.

The 2020 EIA process was undertaken in terms of the gazetted Namibian Government Notice No. 30 Environmental Impact Assessment Regulations (herein referred to as EIA Regulations) of the Environmental Management Act (No 7 of 2007) (herein referred to as the EMA). The EIA process investigated if there are any potential significant bio-physical and socio-economic impacts associated with the project activities and related infrastructure and services.

The project activities (mining and ongoing exploration activities on the Mining License No. 190 (ML-190) were environmentally cleared on the 13th of October 2020 (ECC No. 00991) and expired on the 13th of October 2023. The expired ECC is attached hereto as Appendix A.

An EMP (or EMRP in this case) is one of the most important outputs of the EIA process, as it synthesises all of the proposed (updated) mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of this project (upon renewal of the ECC):

- Planning - the period during which preliminary legislative and administrative arrangements are carried out in preparation to resume mining activities.
- Quarry development – during this phase, the verified sites on the ML will be prepared for mining activities, and associated structures and infrastructure will be erected and installed (where still needed), respectively. **It is important to note that the mine was already constructed, and the ECC renewal is required to resume activities on the ML.**
- Mining/quarrying phase - the period during which the dimension stone (blocks) will be extracted from the verified and developed worksites onsite. This is also the phase during which the worksites, project infrastructure, vehicles, equipment, and machinery will be maintained by Bohale Investment, as deemed necessary.
- Decommissioning and rehabilitation – the period after which the mined site areas will be abandoned and mining sites on the ML will run out of the quality dimension stone, and work ceases. Progressive rehabilitation of the abandoned mined-out areas will be done during this phase.

1.4 About the Environmental Assessment Practitioner

OMAVI Geotechnical & Environmental Services was appointed by Bohale Investment to undertake the Environmental Assessment (EA) to obtain an Environmental Clearance Certificate (ECC) for the activity from the Office of the Environmental Commissioner in the Ministry of Environment, Forestry and Tourism (MEFT). OMAVI Geotechnical & Environmental Services is a specialist environmental consulting entity, with considerable industry experience in environmental compliance and environmental management of exploration and mining projects. Our team of scientists possesses the right set of technical and analytical skills, which collectively ensure that we understand, in an integrated manner, how a set of planned activities would interact with the biophysical, socio-economic, and political landscape within which such activities are envisioned to take place. Additionally, OMAVI is robustly experienced in undertaking state of the environment reporting, Waste Management Planning, Environmental Management Plans (EMPs), public participation, as well as the management and coordination of all aspects of the Environmental Impact Assessment (EIA) value chain. OMAVI has been active in the above fields, and in so doing has made a positive contribution towards environmental protection and sustainable development in Namibia.

At OMAVI, we are grounded in the idea that a balance between development and environmental protection is achievable through proactive and integrated planning whereby projects are designed and executed with sustainability, closure, and rehabilitation goals in mind.

1.5 Project Description

1.5.1 Project locality

Bohale Investment (Pty) Ltd (hereinafter referred to as *Bohale Investment*) was granted a mining license (Mining License (ML) No. 190 (ML-190)) by the Ministry of Mines and Energy (MME) (now the Ministry of Industries, Mines and Energy (MIME) on the 13th of May 2019 for ten (10) years, i.e., valid until the 14th of May 2029. Therefore, the ML is active as per the status on the Namibia MME Portal here https://portal.mme.gov.na/page/MapPublic. Bohale Investment intends to resume the mining of Dimension Stone (marble blocks) and carry out ongoing exploration activities on the 3,985.9787-hectare (ha) mining license. The ML is located about 10km southeast of Karibib Town and is accessible from the D1953 via D1992 as shown on the locality map in Figure 1-1. The ML mainly covers (overlies) Farm Okongava Ost No. 72 and a part of Farm Okatjimukuju No. 55 (see Figure 1-2). The corner coordinates of the mining license (ML) are presented in Table 1-1.

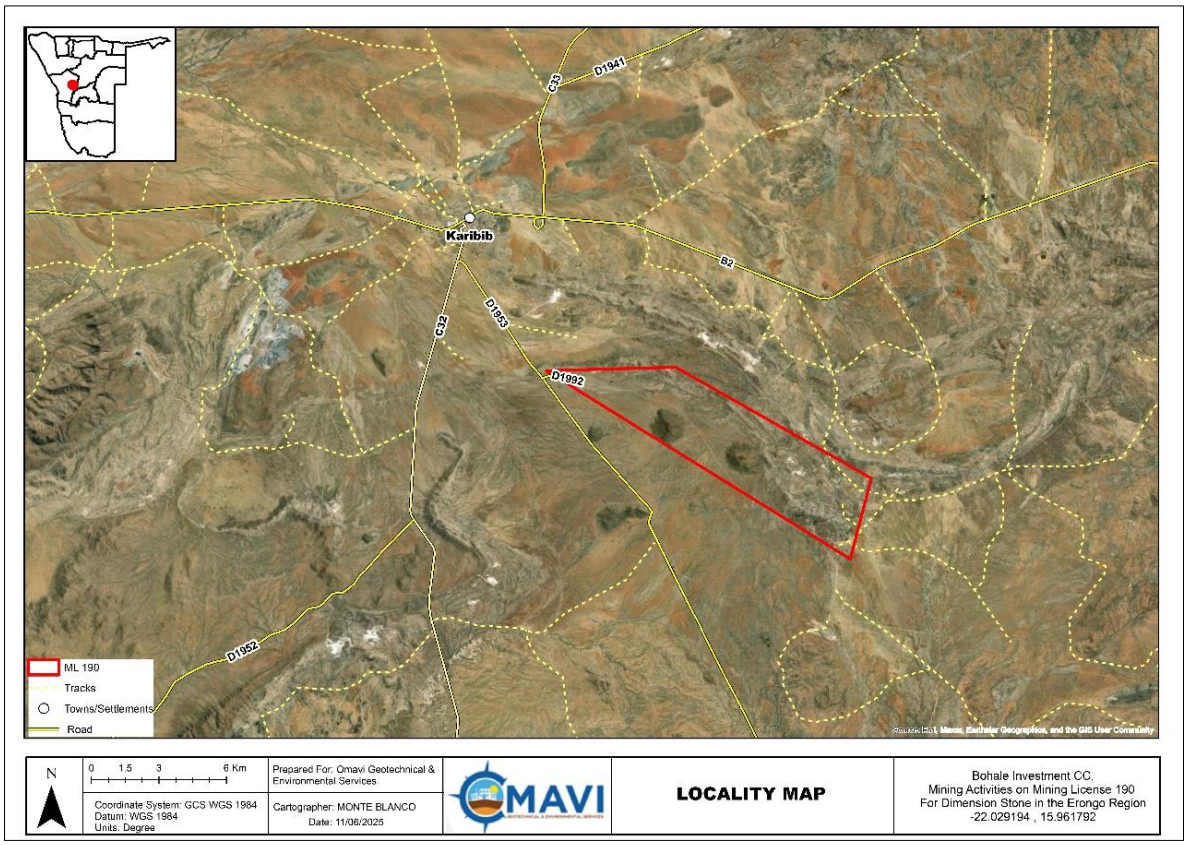


Figure 1-1. The locality map of ML-190 within the Karibib District in the Erongo Region

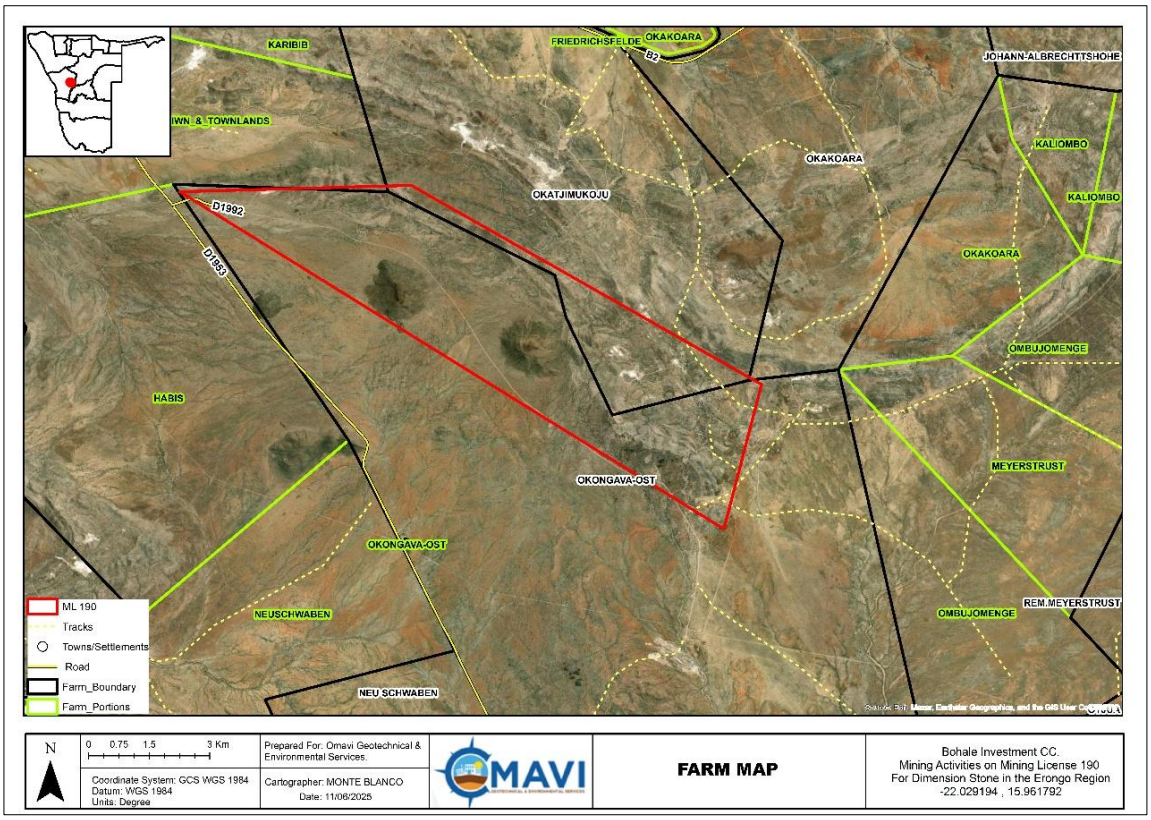


Figure 1-2. The Farm (land use) map of ML-190

Table 1-1. GPS Coordinates of ML-190 (Source: Ministry of Mines & Energy (MME) now Ministry of Industries, Mines & Energy (MIME), 2019)

Order/ML Corner	Lat Deg	Lat Min	Lat Sec		Long Deg	Long Min	Long Sec	
1	-22	02	28.87	S	16	00	47.55	E
2	-22	04	25.19	S	16	00	17.26	E
3	-21	59	53.89	S	15	52	59.53	E
4	-21	59	48.74	S	15	56	5.67	E

1.6 Project Activities

Bohale Investment intends to implement a small-scale surface mining for marble (Dimension Stone). By 2020, the size of the deposit was in excess of 100 million cubic meters, and with continuous ongoing exploration activities, this amount would increase fourfold (RBS, 2020).

The intended resuming of mining activities on ML-190 will use the cutting methods to remove the Dimension Stone slabs, and various technological equipment and instruments will be used in the process. According to RBS (2020), the mining technique entails quarrying with diamond wire saws and stone cutting machines used for cutting out the $5m^3$ and $7m^3$ rectangular blocks.

There will be no stone processing of the mined-out marble blocks on-site, as this will be done either in Karibib or Walvis Bay. At the processing plant, a giant saw is used to cut up the marble into more manageable pieces.

The key activities will entail quarrying, block extraction, and on-site block storage (RBS, 2020):

1.6.1 Mining and operational equipment

Multiple excavators, wheel-loaders, forklift loaders, diesel generator sets, four-cylinder mining machines, wire saw machines, semi-automatic drilling machines, containers, trucks, 4 by 4 cars, and air compressors.

Waste rock will be used for the mine rehabilitation. The effective capacity of the waste rock facility will vary but is likely to be in the range of 120 × 90 m³, calculated using a capacity utilisation coefficient of 0.85 for waste rock.

1.6.2 Water and power supply

The operations will be sourced from an existing borehole on-site. Bohale Investment may also drill additional boreholes as may be required (Risk-Based Solutions, 2020). A groundwater abstraction & use permit will be applied for from the Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR).

The mining operations in ML 190 will use diesels and solar energy as may be required for mining equipment and lighting, respectively (Risk-Based Solutions, 2020).

1.6.3 Supporting activities and infrastructure

Setting up or resuming the use of existing prefabricated or containerised kitchens, offices, laundries, and ablution facilities for site workers. Furthermore, the infrastructure will also include storage of stockpile waste rock at designated sites; solar power supply for domestic use on site; and a diesel storage tank to power project machinery.

1.6.4 Human resources

about 15 to 20 people, including onsite security guards. However, the number of people may vary throughout the operational life depending on the market performance of the commodity. The people who will be employed, for any work they are capable of, will be from Karibib and the surrounding areas.

Staff transport arrangements from Karibib to the mine sites will be provided by Bohale Investment. Karibib-based staff will use the already existing properties in the town of Karibib for accommodation services.

1.6.5 Waste management

- Sewage management (toilets): Portable toilets equipped with a septic tank will be supplied on site for the workers.
- Solid waste management: the waste will be collected in a secure central place onsite, removed from the area, and disposed of at the Karibib Town Council dumpsite, upon obtaining consent from the Town Council before disposing of waste on the dumpsite.

Furthermore, the following services and infrastructure will be on-site:

- Occupational health and safety: all project workers will be supplied with appropriate and adequate personal protective equipment (PPE) while carrying out work onsite. A fully furnished first aid kit will be availed at working sites on the ML.
- Accidental fire outbreaks: The working sites will be equipped with fire extinguishers in case of accidental fire outbreaks on-site.

- Road access: The project-related vehicles will use the existing access roads in the area (including the D1953, D1992, and existing farm access roads) to gain access to the site (ML) areas. Where additional access roads will be required, these will be established. However, consent to create new tracks onsite will be obtained from the respective farm owners. According to Risk-Based Solutions (2020), in terms of external and internal road networks, Bohale Investment will upgrade the already existing external and internal road networks, and create an additional new access road linking the quarries (mine) sites to the main access.

2 LAWS AND POLICIES RELEVANT TO THE EMRP: AUTHORIZATIONS

The laws and policies presented in this EMRP are those that require permitting and authorization for the project and associated activities. Please refer to Table 2-1.

Table 2-1. Permitting requirements for the Project and associated activities

Legislation	Provisions	Implications and Contact Details
Environmental Management Act 2007 Environmental Impact Assessment (EIA) Regulations (EIAR) (GG No. 4878)	Activities listed in Government Notice (GN) No. 29 of GG No. 4878 require an Environmental Clearance Certificate (ECC). The amendment, transfer, or renewal of the ECC (EMA S39-42; EIAR Regs 19 & 20). Amendments to this EMP will require an amendment of the ECC.	The ECC needs should be renewed every 3 years. Mr Timoteus Mufeti: Environmental Commissioner: MEFT's Dept. of Environmental Affairs & Forestry (DEAF) Tel: +264 61 284 2701
The Water Resources Management Act No. 11 of 2013 and the 2023 Water Regulations	A Groundwater abstraction and use permit for commercial use should be applied for. Furthermore, should Bohale Investment produce wastewater onsite, they should apply for a Wastewater/effluent Permit from the Department of Water Affairs (DWA): Directorate of Water Resources Management (Water Environment Division). When issued, Bohale Investment, the permit should be renewed as required (as stipulated therein).	Mr Franciskus Witbooi (Deputy Director: Water Policy and Water Law Administration. Tel: +264 61 208 7158
Mineral Prospecting & Mining Act (Act No. 33 of 1992)	Section 52 requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder. Section 54 requires written notice to be submitted to the Mining Commissioner if the holder of a mineral license intends to abandon the mineral license area. Section 91 requires that rehabilitation measures be included in an application for a mineral license.	Bohale Investment should ensure that there are existing and valid land access agreements with the affected farm owners. There are existing land access agreements from the initial activities on the ML. Thus, new agreements, if necessary, should be entered into with farm owners should the ECC be renewed. All necessary permits/authorizations for the ML

Legislation	Provisions	Implications and Contact Details
		are obtained from the Ministry of Industries, Mines and Energy (MIME). Contact person and details at the MME (Mining Commissioner) Mrs. Isabella Chirchir Tel: +264 61 284 8251.
Forestry Act 12 of 2001, Amended Act 13 of 2005:	Prohibits the removal of any vegetation within 100 m of a watercourse (Forestry Act S22 (1)). The Act prohibits the removal of and transport of various protected plant species.	Should there be protected plant species, such as *Commiphora, Boscia, and Terminalia* species, that need to be removed, a permit should be obtained from the nearest Forestry office. Mr. Johnson Ndokosho: Forestry Director Tel: +264 61 208 7666
Nature Conservation Ordinance No. 4 of 1975 (as amended)	Permits are required for the removal of protected plant species.	
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"	Bohale Investment 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
Road Traffic and Transport Act 52 of 1999 and its 2001 Regulations	Provides for the control of traffic on public roads and the regulations pertaining to road transport, including the licensing of vehicles and drivers.	An access road permit from the main road (B2) should be applied for and obtained from the Roads Authority. Mr Eugene de Paauw (Roads Authority – Specialist Road Legislation) Tel.: +264 61 284 7027
National Heritage Act (Act No. 27 of 2004)	The Act makes provision for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Part V Section 46 of the Act prohibits removal, damage, alteration, or excavation of heritage sites or remains, while Section 48 sets out the procedure for application and granting of permits such as might be required in the event of damage to a protected site occurring as an inevitable result of development. Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should	Should any objects of heritage significance be identified during mining and or exploration activities, the work must cease immediately in the affected sites, and the necessary steps taken to seek authorisation from the Council. See Chance Finds Procedure – Annexure 1. Mrs. Erica Ndalikokule: Director of the National Heritage Council of Namibia

Legislation	Provisions	Implications and Contact Details
	notify the National Heritage Council. Section 51 (3) sets out the requirements for impact assessment.	Tel: +264 61 301 903
Labour Act 11 of 2007, Health and Safety Regulations (HSR) GN 156/1997 (GG 1617).	Adhere to all applicable provisions of the Labour Act and the Health and Safety regulations.	No permit is required, but adherence to the Act's Relevant Regulations is highly recommended.

3 ENVIRONMENTAL MANAGEMENT AND MONITORING ACTIONS

3.1 EMP Implementation Roles and Responsibilities

The EMRP has identified the Employer's Representative, Mining Manager, Safety, Health and Environment (SHE) Officer, and Public Relations Officer (PRO) as important roles to guide the environmental management of mining activities. It should be noted that in practice, however, these roles may be assigned to and performed by one person, due to various foreseen and unforeseen circumstances.

A list of specific responsibilities and duties to be undertaken by each is provided below. It should also be noted that the above-mentioned roles are delegated roles, and Bohale Investment is ultimately responsible for the implementation of the EMRP. The following roles and responsibilities are as assigned in the initial 2020 EMP for the ML by Risk-Based Solutions.

3.1.1 Employer's Representative (ER)

As recommended by Risk-Based Solutions (2020), Bohale Investment is to appoint an ER with the following responsibilities covering the overall socioeconomic aspects, operation (mining) and ongoing exploration activities, monitoring and rehabilitation and decommissioning, closure, and aftercare phases of mining operations and ongoing exploration activities:

- Act as the Employer's (Bohale Investment) on-site project manager and implementing agent.
- Appoint the Environmental Control Officer (ECO).
- Ensure that the Employer's responsibilities are executed in compliance with the relevant legislation and the EMP throughout the mining operations stage.
- Ensure that all the necessary environmental authorizations and permits have been obtained.
- Assist the Contractor in finding environmentally responsible solutions to challenges that may arise (with input from the ECO).

- Should the ER believe that a serious threat to, or impact on, the environment may be caused by the project operations, he/she may stop work. The Employer must be informed of the reasons for the stoppage as soon as possible.
- The ER, or as may be contractually delegated, has the authority to institute disciplinary proceedings under the provisions of the national laws for transgressions of basic conduct rules and/or contravention of the EMP.
- Should the Contractor or his/her employees fail to show adequate consideration for the environmental aspects related to the EMP, the ER can have person(s) and/or equipment removed from the site or work suspended until the matter is remedied.
- Report to the Employer on the implementation of this EMP on site (with input from the ECO and/or independent environmental auditor).
- Maintain open and direct lines of communication between the Employer, ECO, Contractor, and stakeholders with regard to environmental matters.
- Attend regular site meetings and inspections.

3.1.2 Environmental Control Officer (ECO)

The ECO has the following responsibilities covering the overall socioeconomic aspects, operation, ongoing exploration activities, monitoring and rehabilitation and decommissioning, closure, and aftercare phases of mining operations and ongoing exploration activities:

- Assist the ER in ensuring that the necessary environmental authorizations and permits have been obtained.
- Assist the ER and Contractor in finding environmentally responsible solutions to challenges that may arise.
- Conduct environmental monitoring as per EMP requirements.
- Oversee basic conduct rules and/or contraventions of the EMP to the ER.
- Advise the ER on the removal of person(s) and/or equipment not complying with the specifications of the EMP.
- Carry out regular site inspections (on average, weekly) pertaining to compliance with the EMP. Report any non-compliance(s) to the ER as soon as possible.
- Organize for an independent internal audit on the implementation of and compliance with the EMP to be carried out annually. Audit reports are to be submitted to the ER.
- Continuously review the EMP and recommend additions and/or changes to the EMP document.
- Monitor the Contractor's environmental awareness training for all new personnel coming onto the site.

- Keep records of all activities related to environmental control and monitoring. The latter includes a photographic record of the environmental control, rehabilitation process, and a register of all major incidents.
- Attend regular site meetings.

3.1.3 Mining Contractors and Subcontractors

The responsibilities of the Mining Contractors and Subcontractors covering the overall socioeconomic aspects, operation (mining), ongoing exploration activities, monitoring and rehabilitation and decommissioning, closure, and aftercare phases of mining operations and ongoing exploration activities include:

- Comply with the relevant legislation and the EMP for the mining and exploration works.
- Preparation and submission to Bohale Investment of the following Management Plans:
    - Environmental awareness training and inductions.
    - Emergency preparedness and response.
    - Waste management procedure
    - Health and safety requirements.
- Ensure adequate environmental awareness training for senior site personnel.
- Environmental awareness presentations (inductions) to be given to all site personnel before work commencement. The ECO is to provide the course content, and the following topics, at least but not limited to, should be covered:
    - The importance of complying with the relevant Namibian, international, and best practice
    - legislation.
    - Roles and Responsibilities, including emergency preparedness.
    - Basic rules of conduct (Dos and Don'ts).
    - EMP: aspects, impacts, and mitigation.
    - Disciplinary procedures following the provisions of the law for failure to adhere to the EMP.
    - Health and Safety requirements.
- Record keeping of all environmental awareness training and induction presentations.
- Attend regular site meetings and environmental inspections.

3.1.4 Mining Supporting Teams

The mining and exploration activities will require an array of specialist teams working very closely with their suppliers and the core Bohale Investment onsite operations team.

The following is a summary of some of the specialists that will be required as part of the team of contractors and subcontractors covering the overall socioeconomic aspects operations (mining) and ongoing exploration activities, monitoring and rehabilitation and decommissioning, closure, and aftercare phases of mining operations and ongoing exploration activities:

- Mining, structural, civil, and mechanical engineers and crane contractors, electrical contractors, and other specialist teams, each with their respective sub-contractors and suppliers, would report directly to the Employer's Representative (ER), acting as the onsite Project (Mine) Manager.

3.2 Environmental Impacts Associated with the Project Activities

3.2.1 Positive impacts

The potential benefits (positive impacts) of the mining activities are as follows:

- Contribution towards the national economy through the payment of taxes and royalties to the responsible institutions of the Government of the Republic of Namibia. According to RBS (2020), the Group owning Bohale investment has invested around N$600 million in the Namibian economy and in particular the Erongo Region. The project will have employment opportunities, value addition, and in-situ potential underground minerals resources and high beneficiation opportunities in Karibib/Walvis Bay and additional socioeconomic benefits in terms of capital investments, license rental fees, royalties payable to the Government, export earnings, foreign direct investments, and various taxes payable to the Government.
- Empowerment of local businesses: procurement of goods and services, where possible
- Investment opportunities in the area due to the global sought-after commodity, such as the mined dimension stone (marble)
- Payment of land access fees to farm owners (additional income to their livelihoods)

3.2.2 Negative impacts

The potential adverse (negative impacts) of the mining activities are as follows (as updated to the 2020 EMP):

- Impact on water resources (groundwater) in terms of quantity (over-abstraction) to meet the project water demand.
- Loss of biodiversity (fauna and flora) through the removal of vegetation found within the project footprints, and loss of habitats for small fauna under rock outcrops.
- Air pollution by potential dust and gas emissions from mining activities.
- Vehicular traffic: potential increase in local traffic due to project activities.
- Impact on the services infrastructure, such as roads, by project-related heavy trucks.
- Occupational and community health and safety: Improper handling of site materials and equipment may cause health and safety risks.
- Noise and vibration (nuisance): a potential increase in noise level generated by machinery and vehicles may lead to nuisance to locals and wildlife on some farms.
- Physical soil disturbance from mining works and movement of heavy vehicles.

- Soil and water pollution: improper handling of wastewater may lead to surrounding soil pollution and water resources systems.
- General environmental pollution through the mishandling of waste leads to environmental pollution.
- Archaeological or cultural heritage impact through the inadvertent uncovering and damaging of archaeological objects or sites during quarrying on the ML.
- Visual impact from the mined-out areas on the ML may pose as an eyesore to travellers (including tourists) using the D1953, D1992, and other local (access) roads.

3.3 Environmental Management Actions: Socioeconomic mitigation measures for enhancement of positive impacts

Following the findings of the impact assessment carried out in the 2010 environmental impact assessment report and identified impacts listed above, the impact management actions outlined in Table 3-1, Table 3-2 and Table 3-3 have been recommended by Risk-Based Solutions Consultants and updated (where necessary) for the operational phase (as the mining activities will resume/continue from previous activities). Thus, the pre-construction and construction phases of the project are not addressed in the updated EMP.

Table 3-1. Recommended Socioeconomic mitigation measures for the enhancement of positive impacts (updated after Risk-Based Solutions, 2020)

ASPECT	IMPACT	OBJECTIVE	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
1) Creation of employment opportunities	-Direct economic impact would arise from employment opportunities for unskilled or semi-skilled workers. Through the provision of employment, the quality of life of these people will improve.	-Prioritise equal recruitment of local people and Namibian citizens in all structures of the company	Bohale Investment shall: • Stipulate that residents should be employed for temporary unskilled/skilled and, where possible, in permanent unskilled/skilled positions as they would reinvest in the local economy. However, due to low skill levels of the local population, the majority of skilled positions would be filled with people from outside the area. • The recruitment selection process should seek to promote gender equality and the employment of women wherever possible • Ensure that contractors adhere to Namibian Affirmative Action, Labour and Social Security, Health and Safety laws. • -The local authorities, community organizations, and community leaders could be informed on final decisions regarding the project and the potential job opportunities for locals. • Stipulate a preference for local contractors in its tender policy. The procurement of services and goods from local entrepreneurs and the engagement of local businesses should be favoured and promoted, provided that it is financially and practically feasible. • Undertake a skills audit, develop a database of local businesses that qualify as potential service providers, and invite them to the tender process. • Scrutinise tender proposals to ensure that minimum wages are included in the costing.	-Bohale Investment -Contractor -Subcontractor	Ongoing throughout the mining operations and ongoing exploration activities lifecycle
2) Expanded local and regional economic opportunities	-The local economy could be boosted. Induced economic impact would arise from products and services purchased by employees and contractors with the increased availability of money, broadening the economic base and boosting the economy at the Constituency level as well as the regional level.	-Prioritise the procurement of local goods and services			

ASPECT	IMPACT	OBJECTIVE	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
3) Opportunities for skills development.	-Opportunities for skills development, knowledge transfer, and training	-Prioritise employees' skills development and training opportunities	• Project offers experience and on-the-job skills development, particularly for low or semi-skilled workers. This would raise the workers' experience and skills to secure jobs in the future. • Promising employees could be identified, and a training and skills development programme could be initiated. • The project could organize business partnerships with local entrepreneurs or small SMEs. • Service providers to provide opportunities for skills transfer. • Provide opportunities for employees to reskill.		

Table 3-2. Recommended Socioeconomic mitigation measures for the management of negative impacts (updated after Risk-Based Solutions, 2020)

ASPECT	IMPACT	OBJECTIVE	MANAGEMENT ACTIONS	RESPONSIBILITY	ASPECT
1) Unrealistic employment opportunities to be provided by the mining operations and ongoing exploration activities	-Influx of workers employed by contractors, as well as a potential influx of job seekers, resulting in the potential mushrooming of informal settlements around the mining operations and ongoing exploration activities.	-Address unrealistic expectations about the job opportunities by informing the local authorities, community organisations, and community leaders of the final decisions regarding the project and the potential job opportunities -Promote coexistence between the mining operations and ongoing exploration	• It is almost impossible to prevent people from moving into an area in search of job opportunities. Addressing unrealistic expectations about job opportunities could be assisted by informing the local authorities, community organisations, and community leaders of the final decisions regarding the project and the potential job opportunities. • Notify the land-owner(s) if there is an increase in the number of new settlements/housing structures being created around the mine compared to the baseline.	-Bohale Investment -Contractor -Subcontractor	Ongoing throughout the mining operations and ongoing exploration activities lifecycle
	-Increased crime rates are often associated with alcohol and drug abuse. This could be the result of an unsuccessful job seeker needing to find an alternative source of income, or it could be the result of contract workers		• Contract companies to submit a code of conduct, stipulating disciplinary actions where employees are guilty of criminal activities in and around the vicinity of the mining operations and the ongoing exploration activities' area/s of influence. Disciplinary actions should follow Namibian legislation. • Contract companies could implement a no- no-tolerance policy regarding the use of alcohol, and workers should submit to a breathalyzer test upon reporting for duty daily.		

ASPECT	IMPACT	OBJECTIVE	MANAGEMENT ACTIONS	RESPONSIBILITY	ASPECT
2) Workers and an influx of people seeking employment opportunities may create conflicts with the local people/farmers or between employees and job seekers	-Mining operations and ongoing exploration activities, employees and contractors working with the local farmers and also result in stock theft, poaching, and damage to farm infrastructure, for example, fences and gates.	activities and the local communities, farmers, local authorities, community organisations, and community leaders	• Develop a code of conduct for the mining operations and ongoing exploration activities for employees and contractors to address conflicts that may arise. • Develop a compensation policy or framework for stock losses and/or damage to neighbouring farms' infrastructure that can be linked to the mining operations and ongoing exploration activities. • Ensure that all employees are informed of the consequences of stock theft and trespassing on adjacent farms. • Ensure that employees who are found guilty of stealing livestock and/or damaging farm infrastructure are dismissed and charged following the national laws. All dismissals must be per Namibia's labour legislation.		
3) Karibib Town Council is overwhelmed by a sudden increase in the local population	-Increased demands on formal housing, school placements, municipal services, infrastructure, and health services		• The local authorities, community organisations, and community leaders could be informed on final decisions regarding the project and the potential job opportunities, and the need for housing, school placements, municipal services, infrastructure, and health services in the town of Karibib. • Coordinate with the Karibib Town Council on the provisions of serviced land for housing for the employees of the mining operations and ongoing exploration activities		

3.4 Environmental Management Actions: Operational Phase mitigation measures

During this phase, when Bohale Investment resumes producing the mineral concentrates/dimension stone blocks, they will be responsible for fulfilling the requirements in the EIA and this EMP for the operational stage of the mining operations and ongoing exploration activities in the ML-190.

A Project / Site / Health Safety and Environmental (HSE) Manager / Engineer shall be appointed by Bohale Investment to oversee all the site operations as well as management of all the mine operational activities, summarized as follows:

1. Mining operations (actual mining operations as may be required).

2. Transportation of the mined blocks from the pit to the sorting area.

3. Storage and transportation of marble blocks to Karibib or Walvis Bay for further processing.
4. Waste rock management/reprocessing/recovery.
5. Ongoing exploration support.
6. Ongoing rehabilitation and maintenance.
7. Waste water management.
8. Municipal solid waste management/transfer to Karibib.
9. Environmental performance monitoring.

Table 3-3 outlines the EMPs for the operational stage of the mining operations and ongoing exploration activities. Adherence to the regulations, rules, procedures, current and future regional and local land use plans shall be observed at all times by the operational staff, including consultants, contractors, and subcontractors (Risk-Based Solutions, 2020).

Table 3-3. Recommended mitigation measures for the Operational Phase (Mining and ongoing exploration) (updated after Risk-Based Solutions, 2020)

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
1) All activities	-Management and Monitoring	-Social and Environmental Performance	• Ensure that all aspects related to the EMP are implemented during the operations phase. • Adhere to the regulations, rules, and procedures as well as current and future regional and local use plans.	-Bohale Investment -Mining Contractor -Subcontractor	Ongoing throughout the Operational Phase
2) All activities	-Consultation and Disclosure	-Social and Environmental Performance	• Consult with project-affected communities in a structured and culturally appropriate manner throughout the operations phase. Consultation should be "free" (*of external manipulation, interference or coercion, and intimidation*), "prior" (*timely disclosure of information*), and "informed" (*relevant, understandable, and accessible information*). • Adequately incorporate project project-affected communities' concerns.		
3) All activities	-Grievance Mechanism (Equator Principle 6)	-Social and Environmental Performance	• Ensure a mechanism for receiving and resolving any concerns and grievances related to the project's social and environmental performance during the operations phase. • Address concerns promptly and transparently and in a culturally appropriate manner.		

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
4) All activities	-Training, including awareness and inductions	-Social and Environmental Performance	• Train employees and contractors in matters related to the project's social and environmental performance, Namibia's regulatory requirements, and the requirements of the EMP Performance Standards. • Ensure adequate environmental awareness training for all personnel. • Give environmental induction presentations to all new personnel before work commencement.		
5) All activities	-Labour and Working Conditions	Social and Environmental Performance	• Establish, maintain, and improve the worker-management relationship. The employment relationship is based on equal opportunity and fair treatment, and no discrimination is allowed. • Comply with Namibia's labour and employment laws and prevent unacceptable forms of labour, i.e., harmful child and forced labour. • Promote safe and healthy working conditions and the protection and promotion of worker health. • Document and communicate the Working Conditions and Terms of Employment. • Respect Collective Agreements and the right of workers to organize and bargain collectively.		
6) All activities	-Employment and procurement opportunities	-Socio-economic	• Ensure local recruitment (of registered contractors or qualified and certified personnel, registered and certified with the appropriate statutory authorities and procurement to maximize benefit to the region.	-Bohale Investment -Contractor -Mining Subcontractor	Ongoing throughout the Operational Phase
7) All activities	Occupational Health and Safety	Social and Environmental Performance	• Adhere to all Namibian Health and Safety Regulations as prescribed in the Labour Act and Mines Safety Policy / Regulations. • Occupational Health and Safety Training to be provided to all employees. • Ensure that qualified first aid can be provided at all times. • Provide and ensure the active use of Personal Protective Equipment (PPE).		

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
8) All activities	Community Health and Safety	Social and Environmental Performance	• Prevent communicable disease (e.g., sexually transmitted diseases (STDs) such as HIV/AIDS transmission): provide surveillance and active screening and treatment of employees. Prevent illness among employees in local communities (through health awareness and education initiatives). Ensure ready access to medical • treatment, confidentiality, and appropriate care, particularly for migrant workers, and promote immunization.	-Bohale Investment -Contractor -Mining Subcontractor	Ongoing throughout the Operational Phase
9) All activities	Unauthorized public access	Community Safety	• Use gates on the access road(s), and the entire site must be fenced off. • Mine site should not be accessible to anyone from the public. • Notice or information boards relating to public safety hazards and emergency contact details should be put up at the gate(s) and the mine site. • Create a viewpoint area, possibly including an information centre, for the public/tourists as part of the ongoing rehabilitation for mine closure and aftercare land use options as a possible tourism product in the general area.		
10) All activities	Increased traffic/vehicle movement	Air quality (dust or Particulate Matter (PM) pollution)	• Maintain the road surface to preserve surface characteristics (e.g., texture and roughness). • Using dust control/suppression methods, such as applying water or non-toxic chemicals to minimize dust (oil and oil by-products, is not a recommended measure to control road dust.		
11) All activities	-Increased traffic/vehicle movement (exhaust from diesel engines)	-Air quality & Occupational and Community Health and Safety	• Fleet owners/operators to implement manufacturer-recommended engine maintenance programs (to control vehicle emissions: Carbon Monoxide (CO), Nitrogen Oxide (NO_x), Sulphur Dioxide (SO_2), Particulate Matter (PM), and Volatile Organic Compounds (VOCs)).		

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
12) All activities	-Increased traffic/vehicle movement	Occupational and Community Safety	• Adopt best transport safety practices by implementing the following measures: emphasize safety aspects among drivers. Improve driving skills and require licensing of drivers. Adopt limits for trip duration. Avoid dangerous routes and times of day, and use speed control devices. • Regularly maintain vehicles and use manufacturer-approved parts. • Use locally sourced materials (where possible) to minimize transport distances. • Employ safe traffic control measures, including the use of traffic and safety warning signs and flag persons to warn of dangerous conditions.	-Bohale Investment -Contractor -Mining Subcontractor	Ongoing throughout the Operational Phase
13) All activities	-Stormwater management	-Attraction of species (birds and bats) to the area due to open water and subsequent injury, disturbance, or mortality of species	• Implement appropriate stormwater management measures to avoid the presence of open water in the area. • Storm water around the mine site shall not be discharged into the Ephemeral Rivers / any public stream		
14) Mine operations	Mine Operations components	-Species injury, disturbance (and potential alteration of behaviour), or mortality	• Implement monitoring programmes to study the potential impact(s) of the mine site operations on birds and bats.		
	Hazardous waste management	Pollution of the biophysical environment (soil and water)	• Mine site to be equipped with oil absorption and collection systems.		
15) General mine operational maintenance	Cleaning and maintenance of the mine site	-Resource use/depletion of natural resources	• Ensure all water is recycled. Ensure there are no leaks from all taps, pipes, and fittings.		
	Periodic painting of mine structures	Pollution of the biophysical environment (soil and water)	• Conform to ISO 12944:1998 Paints and varnishes - Corrosion protection of steel structures by protective paint systems- Part 4: Types of surfaces and surface preparation.		

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
16) Power transmission and distribution	Electric and Magnetic Fields (EMF)	-Occupational and Community Health	• Ensure that average and peak exposure levels remain below the reference levels developed by the Commission of Non-Ionizing Radiation Protection (ICNIRP). • Reduce the EMF (from power lines, substations, or transformers) by applying engineering techniques (if levels are expected or confirmed above the recommended levels): shielding with specific metal alloys. Burying transmission lines. Increasing the height of the transmission towers, or modifications to the size, spacing, and configuration of conductors.	-Bohale Investment -Contractor -Mining Subcontractor	Ongoing throughout the Operational Phase
17) Power transmission and distribution	Hazardous materials management (insulating oils /gases (Polychlorinated Biphenyls (PCB) and sulphur hexafluoride (SF6)) and fuels)	-Pollution of the biophysical environment (soil and water)	• Minimize the use of Greenhouse gases. • The use of Polychlorinated Biphenyls (PCBs) has largely been discontinued (see International Finance Corporation (IFC) Environment, Health and Safety (EHS) Guidelines for Electric Power Transmission and Distribution for the management of PCBs should it be used). • All activities, Hazardous materials management. • Wood preservatives? Needed?		
18) All activities	Water Management	-Resource use/depletion of natural resources	• Implement a water conservation program, promoting the continuous reduction in water consumption and achieving savings • in water pumping, treatment, and disposal costs, commensurate with the magnitude and cost of water use.		

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
19) All activities	Hazardous materials management	-Pollution of the biophysical environment (soil and water)	• Implement prevention and control measures for the use, handling, and storage of hazardous materials. • Train workers on the correct transfer and handling of fuels and chemicals and the response to spills. • Immediately report and clean up any accidental hydrocarbon spill: Spill-Sorb, Drizzat Pads, Enretech Powder, or Peat Moss can be used to clean up small spills. In case of larger spills, the spill, together with the polluted soil, should be removed and disposed of at, e.g., a biological remediation site.	-Bohale Investment -Contractor -Mining Subcontractor	Ongoing throughout the Operational Phase
		-Occupational Health and Safety	• Implement hazard communication and training programs (including information on Material Safety Data Sheets (MSDS)) to make employees aware of workplace chemical hazards and how to respond to these. • Provide and ensure the active use of Personal Protective Equipment (PPE).		
20) All activities	Waste management: non-hazardous and hazardous	-Air quality	• Avoid the open burning of waste (whether hazardous or non-hazardous).		
		-Pollution of the biophysical environment	• As per the Waste Management Plan. • Institute and maintain good housekeeping and operating practices. Littering is not allowed. • Non-hazardous and hazardous waste to be collected and stored separately: • Non-hazardous waste to be transported to and disposed of at an approved waste disposal site. • Hazardous waste: recycle petroleum (fuels and lubricants) waste products, and collect and recycle batteries and print cartridges. The • remainder to be transported to a recognized hazardous waste disposal site, with prior permission from the site operator/owner.		
21) All activities	Waste management: sanitary	-Pollution of the biophysical environment	• Toilets and Shower Blocks to be provided on the site as part of the administration and supporting infrastructure. Contents to be collected by an approved contractor and disposed of at an approved sewage site.		

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
22) All activities	Waste water management	Pollution of the biophysical environment	• Ensure that the discharge of process wastewater and/or Sanitary wastewater and/or wastewater from utility operations and/or storm water to land conforms to the regulatory requirements. • Discharge to any public stream is prohibited.	-Bohale Investment -Contractor -Mining Subcontractor	Ongoing throughout the Operational Phase

4 CLOSURE, DECOMMISSIONING, FINAL REHABILITATION, AND AFTERCARE EMP

Mining and associated exploration activities are completed; Bohale Investment will need to implement site rehabilitation measures. Decommissioning and rehabilitation are primarily reinforced through either progressive rehabilitation while project activities are ongoing or rehabilitating disturbed sites after completion of work, which consists of safety, health, environmental, and contingency aspects. For safety, health, and the environment, rehabilitation of the mined and explored site areas will include the following:

4.1 Regulatorily Requirements (Risk-Based Solutions, 2020)

Following the provisions of the Minerals (Prospecting & Mining) Act, 1992, Act No. 33 of 1992, the Environmental Management Act, 2007, Act No. 7 of 2007, the Water Act, 1956, Act No. 54 of 1956, the Atmospheric Pollution Prevention Ordinance, 11 of 1976 and Labour Act, 1992, Act No. 6 of 1992, Bohale Investment shall prepared final mine closure and aftercare plan for the mining operations and ongoing exploration activities for approval by MME. The final mine closure and aftercare plan for the mining operations and ongoing exploration activities shall be reviewed before the implementation of the project and shall continue to be reviewed annually throughout the Project lifecycle.

The implementation of the mining operations and ongoing exploration activities closure will take place at the end of the production mine life. The objective of establishing a financial provision to be detailed in the final mine closure and aftercare plan is to ensure that adequate funds are available at the time of a premature or planned mine closure. The financial provision for closure should reflect the real costs and needs to be sufficient to reduce the liabilities and residual risks to an acceptable level at mine closure.
In the event of a default (Company going into administration) the Government and stakeholders will thus have a set of costed detailed design works and will be able to issue a tender and pay for works via the mining operations and ongoing exploration activities Environmental Rehabilitation Fund or any other funding instrument that has been capitalised during the operational stage of the mining operations and ongoing exploration activities in ML 190. This includes any outstanding rehabilitation at mine closure that has not been completed to the satisfaction of the regulators and to enable the formal relinquishment of the mining License (ML).
The final mine rehabilitation, closure, and aftercare aspects considered with an indicative cost estimate cover the following components:

(i) Stakeholder engagement (**N$200, 000.00**).
(ii) Social development (**N$1, 000, 000.00**).
(iii) Decommissioning, rehabilitation, and removal (**N$ 3, 000, 000.00**).
(iv) Environmental management (**N$ 600,000.00**).
(v) Environmental Monitoring **(N$50, 000.00).**

The current estimated cost for permanent closure of the mining and ongoing exploration activities in the ML 190 is **Four Million Eight Hundred and Fifty Thousand Namibian Dollars (N$4, 850, 000.00).** The final mine closure and aftercare costs, indicative figures, must be reviewed and revised as follows:

(i) During the preparation of the Mine Closure Plan.
(ii) Before the implementation of the mining operations and ongoing activities.
(iii) Annually during operations and mine closure, and aftercare stages of the project.

4.2 Mine Closure Plan for ML-190

The Mine Closure Plan to be prepared shall consist of the following five (5) steps that shall be implemented in consultation with the key stakeholders:

(i) Progressive rehabilitation: This will be implemented from the outset of the Project.
(ii) Project closure: Once production stops permanently, the number of workers will be reduced, and a small labour force will be retained to permanently shut down the mine.
(iii) Decommissioning: Will be undertaken by a small crew or contractors who will be responsible for decommissioning or taking apart the mining supporting infrastructure, such as the processing facilities and equipment.
(iv) Final rehabilitation/Remediation/reclamation: The objective of reclamation will be to return the ML area to an acceptable standard of socioeconomic use, ensuring that any landforms and structures are stable, and any watercourses are of acceptable water quality.
(v) Post-closure and aftercare including monitoring: Monitoring programmes will be used to assess the effectiveness of the reclamation measures and to identify any corrective action that may be needed during the post-closure and aftercare stage.

Bohale Investment is committed to minimising the impact of its operations on the local receiving environment, covering physical, biological, socioeconomic environments and ecosystem functions, services, use and non-use values or passive uses. The mining operations and ongoing exploration activities, Mine Closure Plan, and the estimated final mine rehabilitation, closure, and aftercare costs are based on several technical reports for mining operations and ongoing exploration activities prepared by various consultants (Risk-Based Solutions, 2020).

Bohale Investment will provide for expenditures associated with mining operations and ongoing exploration activities final rehabilitation, closure and aftercare costs and will comply with statutory obligations and stipulated requirements of the Ministry of Mines and Energy, the Ministry of Environment, Forestry and Tourism (MEFT), the Ministry of Agriculture, Fisheries Water and Land Reform (MAFWLR) as well as international best practices such as the Equator Principles (EPs) 1-10.
Bohale Investment will make sure that the provision covers all the aspects of the envisaged environmental liabilities at mine closure. The ongoing rehabilitation shall be undertaken during the operational phase of the mine and shall be funded from the annual ongoing operational budget.

The monitoring of the mining operations and ongoing exploration activities, the Mine Closure Plan shall be undertaken in order to measure the achievement of outcomes for both the ongoing rehabilitation and final mine closure and aftercare activities. Both the ongoing rehabilitation and final mine closure and aftercare monitoring activities shall cover air quality and dust emissions, fauna and flora recovery in ongoing and final rehabilitated areas and short and long-term stability of the engineered structures such as waste rock Waste

Management Area (WMA), excavated areas, drainage systems, sedimentation basin and surface and groundwater quality.

The implementation of ongoing rehabilitation activities while the mine is still operational is vital to the successful final mine closure, decommissioning, remediation/reclamation, and post-closure and aftercare. The ongoing rehabilitation should involve the demolishing of redundant infrastructure and facilities, clean-up activities of waste and litter, removal of buried waste, landscaping (slope stability and erosion protection) and ecological restoration through landscape reshaping and re-vegetation works to be undertaken during the life of the mining operations and ongoing exploration activities as soon as practicable following the cessation of use of an area.

The following is a summary of the other key recommendations to be implemented by Bohale Investment for the successful implementation of the mining operations and ongoing exploration activities. In the Mine Closure Plan to be prepared:

1. Bohale Investment commits that each year the Company will review the mining operations and ongoing exploration activities, Mine Closure Plan and costs, and make annual contributions to the mining operations and ongoing exploration activities Environmental Rehabilitation Fund to provide for the final mining operations and ongoing exploration activities rehabilitation, closure, and aftercare costs. An updated mining operations and ongoing exploration activities Mine Closure Plan, containing more technical detail and higher cost-estimation accuracy than the current plan, must be prepared as part of the updated project feasibility during the operational stage of the mining operations and ongoing exploration activities, as may be applicable.
2. All the drawings and designs of the mining operations and ongoing exploration activities closure supporting infrastructure such as sedimentation basin, Waste Management Area (WMA), concrete walls and pits shall be undertaken by a qualified engineer and once such drawings are available, they shall be included in the updated versions of this mining operations and ongoing exploration activities Mine Closure Plan.
3. Continuous monitoring of the following key areas during the mining operations and ongoing exploration activities, and operation with ongoing rehabilitation and monitoring, and final rehabilitation and decommissioning, closure, and aftercare shall be undertaken around the mine site and ML areas:
    (a) The long-term stability of the surface excavations (pits, working faces, other evacuations, and Waste Management Area (WMA).
    (b) Short and long-term water management.
    (c) Long-term impacts on surface and groundwater sources (water quality).
    (d) Fauna and flora recoveries and diversity.

4.3 Mine Closure Plan Mitigation Measures

The mine closure, decommissioning, final rehabilitation, and aftercare EMP will cover the long-term stability and environmental sustainability maintenance of all the remaining supporting infrastructures, such as pits and waste rock. The following is a summary of the activities that will be undertaken as part of the final mine closure and aftercare stages for the mining operations and ongoing exploration activities in the ML-190:

1. Implementation of a sustainable socioeconomic plan.
2. Closure of open pits,
3. Closure of the solid waste transfer station.

4. Backfill all excavated areas.

5. Closure of the mined blocks storage area.
6. Decommissioning of water and electricity infrastructure.
7. Overall land reclamation.
8. Restoration of internal roads.
9. Revegetation and aftercare as may be required

According to Risk-based Solutions (2020), the EMP makes provisions for the management of a wider array of activities that will be associated with the mining operations and ongoing exploration activities in the ML-190, covering the mine closure, decommissioning, final rehabilitation, and aftercare stages. Table 4-1 outlines the EMP framework for the closure and aftercare stages of the project. The summary of key mine components to be addressed in the ongoing and final mine closure plan is presented in Table 4-2.

Table 4-1. EMP for progressive rehabilitation, final closure, and aftercare stages (updated after Risk-Based Solutions, 2020)

ACTIVITY/PROCESS	ASPECT	IMPACT	MANAGEMENT ACTIONS	RESPONSIBILITY	TIMING
1) Mine closure and aftercare stages	Ongoing and Final closure and aftercare stages	-Social and Environmental Performance & Visual	• Isolate (electrically) the mine site from the substation. • Disassemble the steel works and cut off at the top of the foundation concrete. Rehabilitate the hardstand area. • Remove all above-ground substation infrastructure and re-use, recycle, or dispose of it. • Conduct a site contamination assessment. Remove any contaminated material and dispose of it at an appropriate disposal facility. • Break up foundations at all the mine sites and remove for disposal in the open pits. • Dig up the below-ground substation infrastructure and remove it. • Conduct a validation survey to ensure that all contaminated material at the substation has been removed. Remove any contaminated material and dispose of it at an appropriate disposal facility. • Rehabilitate access tracks not required for ongoing land use activities. • Remove all other equipment, waste, etc. from the area. • Reshape WMAs and all disturbed areas to the surrounding contours. • Secure mining pit areas through fencing and closing access • Rehabilitate all excavated and disturbed areas • Manually rip disturbed areas, where compaction has taken place, and cover the areas with previously collected topsoil. • Replant any previously removed native plant species in disturbed areas.	-Bohale Investment -Mining Contractor -Subcontractor	During the Closure and Aftercare Stages
2) Closure	Loss of jobs and income	-Socio-economic	• Implement a skills training programme during the operations phase.		Ongoing throughout the Operational Phase

Table 4-2. Mine components to be addressed in the ongoing and final closure of the mining operations and ongoing exploration activities (Risk-Based Solutions, 2020)

Components	Aspects to be Addressed
Pit Area/s	o Pits stability o Groundwater and rainwater management o Security and unauthorised access o Wildlife entrapment o Effects of drainage into and from the workings
Mine Supporting Facilities	o Removal of containers, buildings, and foundations o Clean-up of workshops, fuel, and reagents o Disposal of scrap and waste materials o Re-profiling and revegetation of the site
Waste management areas	o Slope stability o Effects of leaching and seepage on surface and groundwater o Dust generation o Visual impact o Special considerations for some types of mines, such as uranium mines
Water Management Facilities	o Restoration or removal of dams, reservoirs, settling ponds, culverts, pipelines, spillways, or culverts that are no longer needed o Surface drainage of the site and discharge of drainage waters o Maintenance of water management facilities
Landfill / Waste Disposal Facilities	o Disposal or removal from the site of hazardous wastes o Disposal and stability of treatment sludge o Removal of the sewage treatment plant/facilities o Prevention of groundwater contamination o Prevention of illegal dumping o Security and unauthorised access
Infrastructure	o Removal of power and water supply o Removal of haul and access roads o Reuse of transportation and supply depots

5 ENVIRONMENTAL PERFORMANCE MONITORING

5.1 Environmental Performance Monitoring to be Undertaken

The environmental monitoring process of the EMP performances for the mining operations and ongoing exploration activities, as well as all the supporting infrastructures such as roads, powerlines, and water supply within the ML-190, is divided into two parts, and these are:

(i) Monitoring activities and effects to be undertaken by the Environmental Control Officer (ECO).

(ii) Preparation of an Environmental Monitoring Report covering all activities related to this EMP throughout the life cycle of the mine to be undertaken by the Environmental Control Officer (ECO).

As part of the provisions of this EMP and the conditions of the ECC that will be issued by the Office of the Environmental Commissioner (OEC) in the Ministry of Environment, Forestry and Tourism (MEFT), continuous environmental monitoring and reporting shall be undertaken as provided in the regulations and this EMP. The reporting process will form part of the ongoing environmental monitoring programme. The environmental monitoring programme is part of this EMP performance assessment and will need to be compiled and submitted as determined by the regulator (OEC).

The process of undertaking appropriate monitoring as per specific topic and tracking performances against the objectives and documenting all environmental activities is part of internal and external auditing to be coordinated by the Environmental Control Officer (ECO),/External consultant/suitable qualified in-house resource person. Table 5-1 to Table 5-9 outline the type of information that shall need to be recorded regularly by the Environmental Control Officer (ECO) as part of the monitoring process of the activities and their effects.

The second part of the monitoring of the EMP performance will require a report outlining all the activities related to the effectiveness of the EMP at the end of the mine life to be undertaken by the Environmental Control Officer (ECO). The types of data sets to be used in the preparation of such a report are outlined from Table 5-1 to Table 5-9.

The objective will be to ensure that corrective actions are reviewed and steps are taken to ensure compliance for future EIA and EMP implementation. The report shall outline the status of the environment and any likely environmental liability after completion of the project. The report shall be submitted to the OEC in the MEFT together with the final mine closure report.

Table 5-1. Monitoring of environmental performance implementation / environmental awareness training (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Is there an Environmental awareness training programme?					
How many people have been given environmental awareness training?					
Is a copy of the EMP on site?					
How effective is the awareness training? Do people understand the contents of the EMP? Where are the weaknesses? Ask 3 people at random various questions about the EMP.					

Table 5-2. Monitoring of environmental performance for the temporal and permanent structures (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Are the temporal and permanent structures positioned to avoid sensitive zones, ephemeral river channels, and potential sensitive sites?					
Has new infrastructure been created? If so, what, and how well planned/built concerning the environment?					
Have toilets and showers been provided? Where are they situated?					
Do receptacles for waste have scavenging animal-proof lids?					
What litter is there – who is littering?					
Are there facilities for the disposal of oils / etc., and how often is it removed to an approved disposal site?					
Is there evidence of oil/diesel spills inside or outside of bunded areas?					
What fuel source is being provided for cooking?					
Housekeeping					

Table 5-3. Environmental data collection (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Are records being kept?					
Bird mortality records as a result of collision with the mine-associated infrastructure?					
Are birds nesting activities around the mine site?					
Noise level?					
Air Quality?					
Have archaeological sites been found/disturbed/described?					
Other key environmental data sets?					

Table 5-4. Health, Safety, and Environment (HSE) monitoring (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Is there a First Aid Kit containing antihistamines, etc?					
Are dangerous areas marked off?					
Do vehicles appear to maintain the recommended speed limits?					
Do vehicles drive with headlights on along the gravel roads at all times?					

Table 5-5. Recruitment of labour (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
What labour source is used?					
How has the recruitment practice been done?					

Table 5-6. Management of the natural habitat and surficial materials management (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Has there been any development done on or very close to sensitive areas?					
Has anyone been caught with plants or animals in their possession?					
Has there been willful or malicious damage to the environment?					
Has the topsoil/seed bank layer been removed from demarcated development areas and appropriately stored?					

Table 5-7. Tracks and off-road driving (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Are existing tracks used and maintained?					
What new tracks have been developed, and are they planned?					
What evidence is there of off-road driving? Who appears to be responsible?					
Are corners being cut? What types of turning circles are there? Three-point turns vs. U turns?					
Have unnecessary tracks been rehabilitated, and how well?					
Comments					

Table 5-8. Management of surface and groundwater (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
How is potable water supplied, and how often? Position of tanks?					

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Is water being wasted?					
Is there any leakage from pipes or taps?					
Were water samples taken regularly and measured?					

Table 5-9. Public relations (Risk-Based Solutions, 2020)

Mitigation	Compliance	Follow-up Action Required	By Whom	By When	Completed
Have any complaints been made about the mine or operational activities by the different stakeholders? If so, what, and how was the issue resolved?					

6 ENVIRONMENTAL AWARENESS (RISK-BASED SOLUTIONS, 2020)

6.1 Environmental Awareness Guidance

(i) The Environmental Rules apply to EVERYBODY. This includes all permanent, contract, or temporary workers as well as any other person who visits the mine site. Any person who visits the mine site will be required to adhere to the company's Code of Conduct, which enshrines industry best environmental practice.

(ii) The ENVIRONMENT means the whole surroundings around us. The environment is made up of the soil, water, air, plants, and animals. and those characteristics of the soil, water, air, plant, and animal life that influence human health and wellbeing.

(iii) If any member of the WORK FORCE does not understand, or does not know how to keep any of the Environmental Rule or Procedure, that PERSON must seek advice from the ENVIRONMENTAL CONTROL OFFICER (ECO), SITE MANAGER, or CONTRACTOR. A person who does not understand must keep asking until she/he is able to keep to all the Environmental Rules and Procedures.

(iv) Personnel who knowingly contravene the Environmental Rules and Procedures will be subject to the Company's disciplinary procedures.

6.2 Environmental Awareness Training Materials

6.2.1 Natural Environmental Management Guidance

- Never feed, tease or play with, hunt, kill, destroy or set devices to trap any wild animal (including birds, reptiles and mammals), livestock or pets. Do not bring any wild animal or pet to the mine site.
- Do not pick any plant or take any animal out of the mine site area. You will be prosecuted and asked to leave the project area.
- Never leave rubbish and food scraps or bones where they will attract animals, birds, or insects. Rubbish must be thrown into the correct rubbish bins or bags provided.
- Protect the surface vegetation by not driving over it unnecessarily.
- Do not drive over, build upon, or camp on any sensitive habitats for plants and animals.
- Do not cut down any part of living trees/bushes for firewood.
- Do not destroy bird nests, dens, burrow pits, termite hills, etc., or any other natural objects in the area.

6.2.2 Vehicle Use and Access Guidance

- Never drive any vehicle without a valid licence for that particular vehicle, and do not drive any vehicle that appears not to be roadworthy.
- Never drive any vehicle when under the influence of alcohol or drugs.
- DO NOT make any new roads or tracks without permission. Stay within demarcated areas.
- Avoid U-turns and large turning circles. 3-point turns are encouraged. Do not ever drive on rocky slopes or vegetated dune areas.
- Stay on the road, do not make a second set of tracks, and do not cut corners.
- DO NOT SPEED - keep to the designated speed limit on the tracks and site roads.
- No off-road driving is allowed. and
- Vehicles may only drive on demarcated roads.

6.2.3 Air Emission and Dust Reduction

- Manage the speed for all vehicles on the mine and community roads to reduce dust emissions.
- Stockpiles should be covered with dust dust-binding chemical to reduce fugitive emissions.

- Chemical binding substances can be applied to road surfaces to suppress dust particles and reduce emissions within the mine, which will reduce fugitive emissions in the community.
- Recycling water can be sprayed on roads, stockpiles, and conveyors to suppress dust, thus reducing dust emissions.
- Continuous weather monitoring on site. and
- Employ loading practices for trucks by excavators to minimise dust generation.

6.2.4 Noise and Vibrations Emission Reduction

- Speed reduction can reduce noise associated with vehicles and trucks' movements and ensure that vehicles are serviced regularly.
- Machinery that meets Namibian and international noise emissions standards will be used.
- Careful selection of equipment and insulation, and sound enclosures around machinery can control noise.
- Regular and extensive monitoring of noise impact associated with blasting as well as other mining operations.
- Blasting times will be managed to minimise the impact of noise and vibration.
- Designing detonation sequence with delays between holes so that blast waves from individual holes do not occur simultaneously.

6.2.5 Preventing Pollution and Dangerous Working Conditions Guidance

- Never throw any hazardous substance such as fuel, oil, solvents, etc., into streams or onto the ground. Never allow any hazardous substance to soak into the soil.
- Immediately tell your supervisor or Environmental Control Officer / Site Manager when you spill or notice any hazardous substance being spilled anywhere in the mine.
- Report to your Supervisor or Environmental Control Officer / Site Manager when you notice any container that may hold a hazardous substance overflow, leak, or drip.
- Immediately report to your supervisor or Environmental Control Officer / Site Manager when you notice overflowing problems or unhygienic conditions at the ablution facilities.
- Vehicles, equipment, and machinery, containers, and other surfaces shall be washed at areas designated by the Contractor or Environmental Control Officer/ Site Manager.
- If you are not sure how to transport, use, store, or dispose of any hazardous substance, ASK your supervisor or Environmental Control Officer / Site Manager for advice.

6.2.6 Saving Water Guidance

- Always use as little water as possible. Reduce, reuse, and recycle water where possible.
- Report any dripping or leaking taps and pipes to your supervisor or Environmental Control Officer, or Site Manager.
- Never leave taps running. Close taps after you have finished using them.

6.2.7 Disposal of Waste Guidance

- Learn to know the difference between the two main types of waste, namely: General and hazardous wastes.
- Learn how to identify the containers, bins, drums, or bags for the different types of waste. Never dispose of hazardous waste in the bins or skips intended for general waste or construction rubble.
- Never burn or bury any waste within the mining license area.
- Never overfill any waste container, drum, bin, or bag. Inform your supervisor or the Environmental Control Officer / Site Manager if the containers, drums, bins, or skips are nearly full.
- Never litter on the site, in the field, or along any road. No illegal dumping.

- Littering is prohibited.

6.2.8 Religious, Cultural, Historical, and Archaeological Objects Guidance

- If you find any suspected religious, cultural, historical, or archaeological object or site around the mine, you must immediately notify your supervisor or Environmental Control Officer/Site Manager.
- Never remove, destroy, interfere with, or disturb any religious, cultural, historical, or archaeological object or site around the mine site.

6.2.9 Dealing with Environmental Complaints Guidance

- If you have any complaint about dangerous working conditions or potential pollution to the environment, immediately report this to your supervisor or the Environmental Control Officer/Site Manager.
- If any person complains to you about noise, lights, littering, pollution, or any other harmful or dangerous condition, immediately report this to your supervisor or the Environmental Control Officer / the Site Manager.

6.3 Environmental Personnel Register

The Environmental Awareness Training will be undertaken as part of the Site General Induction, and an Environmental Personnel Register will be signed by every person who receives or attends the Environmental Awareness Training or who has the training material explained to them or has the training material (Risk-Based Solutions, 2020).

ANNEXURE 1: CHANCE FINDS PROCEDURE (AFTER KINAHAN, 2020)

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

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

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

- National Heritage Council of Namibia (Head Office: +264 61 244 375 / 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 by the law.

Responsibility:

Operator: To exercise due caution if archaeological remains are found

Foreman: To secure the site and advise management promptly

Superintendent: To determine the safe working boundary and request an inspection

Archaeologist: To inspect, identify, advise management, and recover remains

Procedure:

<u>Action by a person identifying archaeological or heritage material:</u>

a) If operating machinery or equipment, stop work

b) Identify the site with a flag tape

c) Determine the 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 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 labelling 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.

ANNEXURE 2: COPY OF THE EXPIRED ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) NO. 00991

ECC – 00991 Serial: 0hu6rV991

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

In accordance with Section 37(2) of the Environmental Management Act (Act No. 7 of 2007)

TO

Bohale Investment CC
P. O. Box 4676, Walvis Bay

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

Proposed Mining and Ongoing Exploration Activities in the Mining License (ML) No. 190 Karibib District, Erongo Region

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
Private Bag 13306
WINDHOEK NAMIBIA
19 OCT 2020
ENVIRONMENTAL COMMISSIONER
REPUBLIC OF NAMIBIA

Issued on the date: 2020-10-13

Expires on this date: 2023-10-13

(See conditions printed over leaf)

Reduce
Reuse
Recycle

NAMIBIA BEGIN A TRASH BIN RIGHT THING

This certificate is printed without erasures or alterations

ECC –

CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project
4. All relevant permits must be obtained from permitting authorities
5. All applicable and required permits are obtained and mitigation measures stipulated in the EMP are applied particularly with respect to management of ecological impacts.
6. Strict compliance with national heritage guidelines and regulations is expected throughout the life-span of the proposed activity, therefore any new archaeological finds must be reported to the National Heritage Council for appropriate handling of such.
7. A six monthly report on project progress and environmental management profile, starting from date of commencement of operations, must be submitted by the Proponent to Office of Environmental Commissioner