

UPDATED ENVIRONMENTAL MANAGEMENT PLAN (EMP)

FOR THE ESTABLISHMENT OF MINING ACTIVITIES OF
BASE AND RARE METALS AND SEMI-PRECIOUS STONES ON MINING CLAIMS; 75276 AND
75277 AT FRANSPONTEIN, KHORIXAS DISTRICT, KUNENE REGION.



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Prepared for Mr. Romanus Goreseb

ABBREVIATION

AIDS	Acquired Immune Deficiency Syndrome
CC	Close Corporation
DEA	Directorate of Environmental Affairs
DESR	Draft Environmental Scoping Report
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Compliance Officer
ECS	EnvironClim Consulting Services
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GPS	Global Positioning System
Ha	Hectare
HIV	Human Immune Virus
I&APs	Interested and Affected Parties
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MM	Millimetres
MIME	Ministry of Industries, Mine and Energy
NAD	Namibian Dollars
NHC	National Heritage Council
PPEs	Personal Protective Equipment's
SME	Small Medium Enterprise
WHO	World Health Organization

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1. INTRODUCTION

Mr. Romanus Goraseb, hereafter referred to as the proponent intend to carry out mining activities of base and rare metals and semi-precious stones on mining claims; 75276 and 75277 at Fransfontein within the Khorixas District in Kunene Region. The proponent lodged his application with the Ministry of Industries, Mine and Energy (MIME) for the mining claims on the 10th April 2024 and it was eventually granted on the 30th October 2024 to merely mine semi-precious stones following completion of relevant environmental authorisation processes. Following the granting of the mining claims, the Proponent conducted further investigations and discovered that the area has prospect for copper. This significant finding prompted the need to amend the mineral group on the mining claims to include base and rare metals, enabling the mining of copper ore in addition to semi-precious stones. The proposed upscaling of operations to include base and rare metals constitutes a listed activity under the Environmental Management Act, 2007 (Act No. 7 of 2007) (EMA) and the Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012). Consequently, an Environmental Clearance Certificate (ECC) is required prior to commencement of mining activities for base and rare metals mineral group. The estimated project investment is approximately Namibian Dollar (NAD) 30 million that will be secured from a strategic partnership with secured investor from India. In the interim an off-take agreement has been endorsed pending the approval of the project by the competed authority. The project will provide the much-needed employment to about 40 people mainly the youth from the surrounding villages and extended further to Fransfontein. In addition, the project will stimulate the regional economy as well as that of Fransfonteins and nearby towns such as Khorixas and Kamanjab. The proposed mining project is anticipated to have a life span of approximately 10 years with extension potential, subject to additional mineral reserve in the area.

The proponent has appointed EnvironClim Consulting Services (ECS) to carry out an Environmental Impact Assessment (EIA) and develop an Environmental Management Plan for the proposed small-scale mining project.

2. PROJECT LOCATION

The mining claims are situated approximately 14 Km North-West of Fransfontein, Khorixas district, Kunene region (see **Figure 1** below for the proposed location of the mining claims). The mining claims have a combined total size of 35.0325 Ha (75276 covers an area of 17.8965 Ha, while mining claim; 75277 covers an area of 17.136 Ha). The mining claims are accessible via the C35 road from Fransfontein

to Kamanjab and then turn to the right after 3Km and proceed with a small track for about 10 Km, the mining claims are situated approximately 1 Km on the left side of the road.

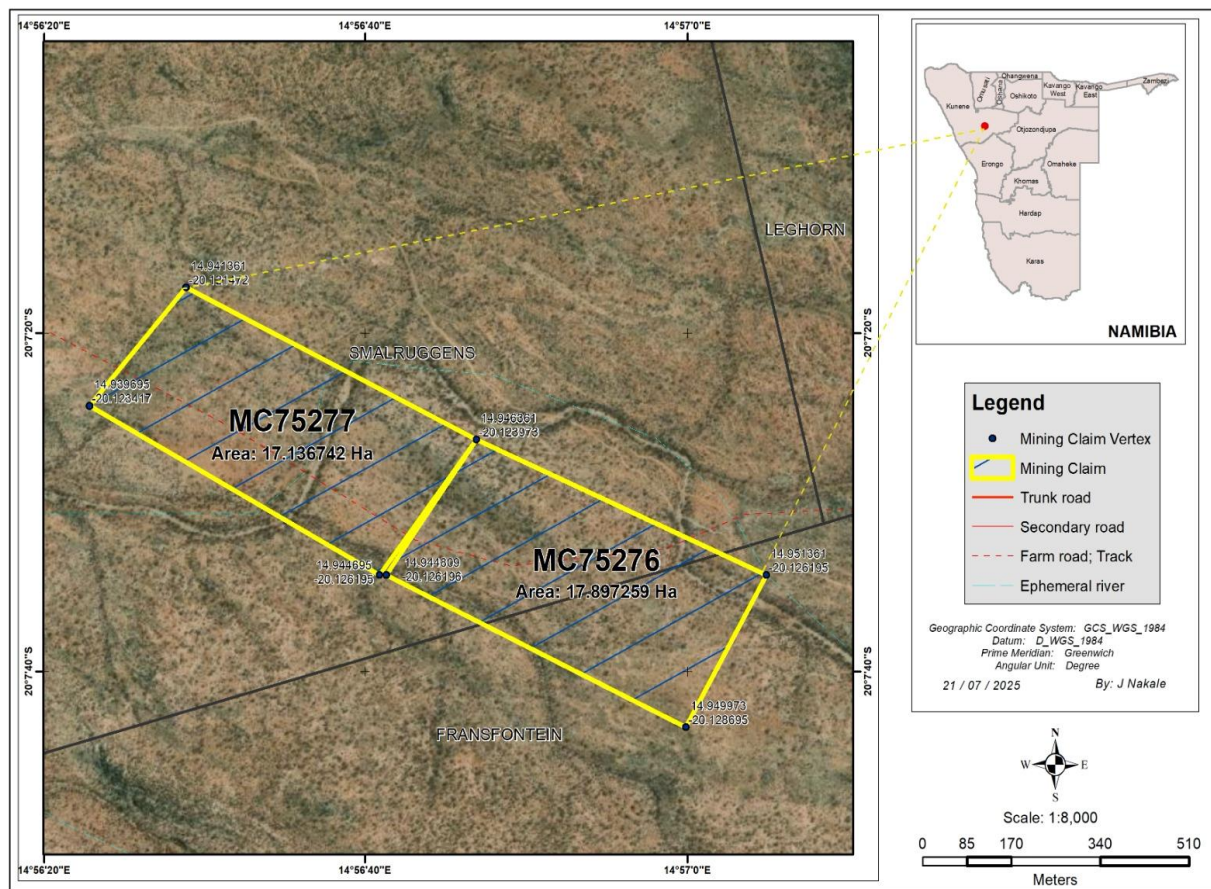


Figure 1: Location of the mining claims; 75276 and 75277 (GPS coordinates - 20.123611 S, 14.942222 E) (Fransfontein, Khorixas district, Erongo region (yellow polygon).

PURPOSE OF THE EMP

The Environmental Management Plan (EMP) presented herein adopts a comprehensive risk management approach to guide the proposed mining activities on claims; 75276 and 75277, where base metals and rare metals, and semi-precious stones will be extracted. At its core, the EMP provides a logical and practical strategy that details not only the specific mitigation measures required to minimize environmental harm but also the monitoring actions and control mechanisms necessary to verify their effectiveness. The ultimate goal is to reduce the project's likely environmental impacts such as vegetation loss, habitat disturbance, and soil degradation to a level that is considered insignificant and environmentally acceptable. Beyond technical measures, the EMP also defines the roles, responsibilities, and lines of accountability for all personnel involved, from site operators to environmental compliance officers. Every mitigation measure included in this plan has been tailored specifically to the unique

characteristics of mining claims 75276 and 75277, ensuring that the proposed extraction of base and rare metals, as well as semi-precious stones, proceeds with the highest practicable environmental safeguards in place.

3. COMPLIANCE TO THE EMP

This Environmental Management Plan (EMP) constitutes a legally binding document, as explicitly stipulated under the provisions of the Environmental Management Act, 2007 (Act No. 7 of 2007). Consequently, the project proponent and all affiliated contractors are legally obligated to comply fully with the framework outlined herein. Furthermore, it is of paramount importance that the proponent and its contractors recognize and acknowledge that this EMP is designed as a living document. As such, modifications to the plan are both anticipated and permitted, contingent upon evolving environmental conditions or the emergence of new information that may become available during the project lifecycle. Any such revisions must be undertaken in strict accordance with the provisions of the Environmental Management Act (EMA) and subjected to the appropriate review processes.

4. LEGAL AND POLICY FRAMEWORK

The proposed project shall be established and operated under the provision of the relevant statutory framework of Namibia. All mineral rights related to mining activities are regulated by the Ministry of Industries, Mines and Energy (MME), whereas the environmental regulations are regulated by the Ministry of Environment, Forestry and Tourism (MEFT).

Table 1. Legal requirements for the proposed project

Legislation	Summary	Applicability
The Namibian Constitution	The Namibian constitution is the supreme law of the country which is committed to sustainable development. Article 95(1) of the Constitution of Namibia states that: - "The State shall actively promote and maintain the welfare of the people by adopting policies aimed at ... The maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future".	To undertake the EIA in order to maintain the ecological process and diversity of ecosystem
The Environmental Management Act	The Environmental Management Act No 7 of 2007 aims to promote the sustainable management of the environment and the use of natural resources and to provides for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters. The acts provide a list of activities that may not be undertake without an environmental clearance certificate. Further, the Act ensures that; (a) Potential threats are considered timeously	Legal requirement to undertake an EIA

Legislation	Summary	Applicability
	<p>(b) A comprehensive stakeholder's consultation is conducted, and all Interested and affected parties are given an opportunity to comment on the project</p> <p>(c) Decision are robust by considering the above-mentioned activities</p>	
Atmospheric Pollution Prevention Ordinance Act No.11 of 1976)	<p>This Ordinance serves to control air pollution from point sources, but it does not consider ambient air quality. This ordinance is being repealed by the proposed Pollution Control and Waste Management Bill. Any person carrying out a 'scheduled process' which are processes resulting in noxious or offensive gases typically pertaining to point source emissions have to obtain a registration certificate from the Department of Health.</p>	<p>Generation of greenhouse gases by the fuel</p>
Draft Pollution Control and Waste Management Bill	<p>This Bill serves to regulate and prevent the discharge of pollutants to air and water as well as providing for general waste management. The Bill will repeal the Atmospheric Pollution Prevention Ordinance (11 of 1976) when it comes into force. The Bill also provides for noise, dust or odour control that may be considered a nuisance. Further, the Bill advocates for duty of care with respect to waste management affecting humans and the environment and calls for a waste management licence for any activity relating to waste or hazardous waste management.</p>	<p>Possible fuel spill and leakages may pollute ground and surface water.</p>
Environmental Policy framework (1995)	<p>This policy subjects all developments and project to environmental assessment and provides guideline for the Environmental Assessment. Its provision mandate that Environmental Assessment take due consideration of all possible impacts and incorporate them in the development or planning stages.</p>	<p>Provision of the EIA and guidelines</p>

Legislation	Summary	Applicability
<p>The Occupational Safety and Health Act No. 11 of 2007;</p>	<p>Safety: A safety risk is a statistical concept representing the potential of an accident occurring, owing to unsafe operation and/or environment. In the working context “SAFETY” is regarded as “free from danger” to the health injury and to properties.</p> <p>Health: Occupational Health is aimed at the promotion and maintenance of the highest degree of physical, mental and social wellbeing of workers in all occupations. This is done by ensuring that all work-related hazards are prevented and where they occur, managed.</p>	<p>Operating mining equipment has the potential risk of injuries.</p> <p>Provision of clean ablution facility, routine health check-ups for employees, HIV/AIDS awareness etc.</p>
<p>Public Health Act No. 36 of 1919</p>	<p>The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him/her or of which he/she is in charge of any nuisance or other condition liable to be injurious or dangerous to health.</p>	<p>Ensure public safety from noise, dusts, and air pollution.</p>
<p>Water Resources Management Act (2004)</p>	<p>This Act provides a framework for managing water resources based on the principles of integrated water resources management. It provides for the management, development, protection, conservation, and use of water resources. Furthermore, any watercourse on/or in close proximity to the site and associated ecosystems should be protected in alignment with the listed principles.</p>	<p>Ensure that the riverine systems are not polluted and implement pollution control mechanism to avoid water pollution</p>

Legislation	Summary	Applicability
Water Act No, 54 of 1956	<p>This act states that, all water resources belong to the State. It prevents pollution and promotes the sustainable utilization of the resource. To protect these resources, this act requires that permits are obtained when activities involve the following;</p> <ul style="list-style-type: none"> • Discharge of contaminated into water sources such as pipe, sewer, canal, sea outfall and • Disposal of water in a manner that may cause detrimental impact on the water resources 	Contaminated water, such as sewage sludge must not be dumped into the riverbeds.
Petroleum Product and Energy Act No, 13 of 1990	This Act provides a framework for handling and distribution of petroleum products which may include purchase, sale, supply, acquisition, possession, disposal, storage or transportation thereof.	Safe handling of the petroleum products such as fuel and lubricants.
Labour Act No. 11 of 2007	This Act aims to regulate labour in general and includes the protection of the health, safety and welfare of employees. The 1997 regulations relating to the Health and Safety of employees at work sets out the duties of the employer, welfare and facilities at the workplace, safety of machinery, hazardous substances, physical hazards, medical provisions, construction safety and electrical safety.	Follow legal labour requirements such as safety, remuneration etc
Regional Council Act, 1992 (Act No. 22 of 1992)	The Regional Councils Act legislates the establishment of Regional Councils that are responsible for the planning and coordination of regional policies and development. The main objective of this Act is to initiate, supervise, manage and evaluate development at regional level.	Observe the regional by laws

Legislation	Summary	Applicability
Communal Land Reform Act 5 of 2002	Section 36 B. Stipulates the allocation of rights in respect to communal land to anyone who seek to occupy land for the purposes of providing public services.	The proponent acquired land from the relevant traditional authority.
Soil Conservation Act No. 76 of 1969	This act promotes the conservation of soil, prevention of soil erosion.	Coordinate movement of mining equipment to prevent soil erosion. Ensure conservation of topsoil.
Hazardous Substances Ordinance No. 14 of 1974	This ordinance gives provision to control the handling of hazardous substance in all circumstances, such as manufacturing, imports and exporting of these to ensure human and environmental safety.	Handling of fuel, fire and explosion risks
National Heritage 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	Mining activities such excavation and trenching may unearth archaeological material.
Word's Best Practises	<p><i>Precautionary Approach Principle</i></p> <p>This principle is worldwide accepted when there is a lack of sufficient knowledge and information about the possible threats to the environment. Hence if the anticipated impacts are greater, then precautionary approach is applied. In this project, there are</p>	Mining mineral particularly in the area with biodiversity as well as surface and underground water can be detrimental to the ecosystem and underground water resource. Therefore, precaution must be taken when doing excavation and trenching during mining.

Legislation	Summary	Applicability
	<p>no eminent uncertainty however in cases when they arise, this approach should be applied.</p> <p><i>Polluter Pays Principle</i></p> <p>This principle ensures that proponents takes responsibility of their actions. Hence in cases of pollution, the proponent bears the full responsibility to clean up the environment.</p>	<p>In the event of any damage of biodiversity and pollution of underground water, the proponent must be responsible to compensate for the damages.</p>

5. ROLES & RESPONSIBILITIES

5.1. Environmental Compliance Officer (ECO)

The Ministry of Environment, Forestry and Tourism serves as the statutory custodian of environmental protection within the jurisdiction. Under the delegated authority conferred by the provisions of the Environmental Management Act (EMA), an Environmental Compliance Officer (ECO) shall be appointed from the Directorate of Environmental Affairs. This appointed officer is specifically mandated to enforce compliance with the EMA and any associated environmental authorizations or management plans. To fulfil this mandate, the ECO is authorized to carry out inspections at any given time, without prior notice, to ensure adherence to environmental regulations. Furthermore, the ECO shall conduct site visits for environmental inspection and monitoring purposes at any time deemed necessary; however, the frequency and timing of such visits may be influenced by the officer's work schedule and operational priorities.

5.2. The Proponent

Mr. Romanus Goreseb shall be the designated individual with overall accountability for environmental management throughout the project lifecycle. His primary mechanism for fulfilling this accountability shall be the diligent and acceptable implementation of the Environmental Management Plan (EMP) in all respects. Additionally, it shall be the full and exclusive responsibility of the project proponent to implement the following activities:

- ❖ **Appointment of a Site Manager:** The proponent must appoint a competent Site Manager responsible for the operational execution of environmental and safety requirements.
- ❖ **Workforce Training and Awareness:** The proponent must ensure that every worker and contractor engaged in the project is fully conversant with the contents of the Environmental Management Plan (EMP). Additionally, all personnel must receive formal induction on safety measures specifically tailored to the mining of base metals, rare metals, and industrial minerals on mining claims 75276 and 75277, situated within the Khorixas district of the Kunene Region.
- ❖ **Occupational Health and Safety:** The proponent must ensure the continuous provision of a safe and healthy working environment for all personnel, including measures to prevent accidents, injuries, and occupational illnesses.

- ❖ **Personal Protective Equipment (PPE):** The proponent must provide all workers with appropriate Personal Protective Clothing (PPE) suited to the specific hazards of the mining operation, including but not limited to head, eye, hearing, hand, foot, and respiratory protection.
- ❖ **Safety Monitoring:** The proponent must actively monitor employees' work practices with regard to safety, conducting regular observations and interventions to correct unsafe behaviors.
- ❖ **Environmental Performance Assurance:** The proponent must ensure consistently good environmental performance and demonstrate full compliance with all applicable environmental laws, permits, and the EMP itself.
- ❖ **Environmental Officer Appointment and Reporting:** The proponent must appoint a qualified Environmental Officer or Environmental Practitioner. This appointee shall be responsible for carrying out environmental audits, preparing monitoring and evaluation reports, and compiling bi-annual reports for submission to the Office of the Environmental Commissioner.

5.3. Site Manager

The Site Manager serves as the official representative of Mr. Romanus Goreseb (the proponent) with respect to environmental management on site. Consequently, the Site Manager bears the following specific responsibilities:

- ❖ **Monitoring of Daily Operations:** The Site Manager shall monitor all daily operational activities to ensure they are conducted in accordance with the EMP.
- ❖ **Ensuring Worker and Contractor Adherence:** The Site Manager shall ensure acceptable adherence by all workers and contractors to the provisions of the EMP.
- ❖ **Availability of the EMP:** The Site Manager must ensure that a complete copy of the EMP is readily available and easily accessible on site at all times.
- ❖ **Worker Familiarity:** The Site Manager must ensure that every worker is adequately acquainted with the contents and requirements of the EMP.

5.4. Employees and Contractors

All stakeholders involved in the proposed small-scale mining project with particular emphasis on employees and contractors—must comply with the following mandatory requirements;

- ❖ **Adherence to the EMP:** All stakeholders must adhere strictly to the provisions, mitigation measures, and protocols outlined in the Environmental Management Plan (EMP).

- ❖ **Use of Personal Protective Equipment:** All stakeholders must ensure they wear appropriate Personal Protective Clothing (PPE) at all times while engaged in any work activities on site.
- ❖ **PPE Maintenance and Replacement:** All stakeholders must promptly report any worn out, damaged, or defective PPE and request timely replacement to maintain adequate protection.
- ❖ **Compliance with Company Policies:** All stakeholders must adhere fully to all applicable company rules, policies, and procedures governing conduct and safety on site.

6. DISCIPLINARY ACTION

This Environmental Management Plan (EMP) constitutes a legally binding document. Any non-compliance with the provisions of this EMP shall result in punishable legal action against the proponent. Such legal action may include, but is not limited to; Suspension of work or operational activities and imposition of financial penalties or fines. The specific disciplinary action to be taken shall be determined in strict accordance with the provisions of the Environmental Management Act (EMA) and any other relevant statutory frameworks governing environmental compliance in Namibia. Under Section 27(4) of the EMA: *"Any person who contravenes subsection (3) commits an offence and is on conviction liable to a fine not exceeding N\$500,000 or to imprisonment for a period not exceeding 25 years, or to both such fine and such imprisonment."*

7. THE ENVIRONMENTAL MANAGEMENT PLAN

The scope of this Environmental Management Plan (EMP) is expressly defined with reference to the Environmental Impact Assessment (EIA) conducted for the proposed mining activities. These activities pertain to the extraction of base metals and rare metals, and industrial minerals on mining claims 75276 and 75277, situated within the Khorixas district of the Kunene Region. Furthermore, the scope extends to include the decommissioning phase of the proposed small-scale mining project.

This EMP has been designed by taking into account the following key aspects associated with the project: Social, Environmental, Safety, and Occupational Health. These aspects are summarized in **Table 2** below.

Table 2 : Environmental Management Plan (EMP)

Activity	Objectives
	Induction

A – Staff Induction	Communication
B – Health and Safety	General safety at workplace
	Ablution facilities
	Dust and Noise Exposure
C – Pollution and Waste Management	Material waste, domestic waste
	Mining equipment and vehicle emissions, dust and noise
	Fuel spillage and leakages
	Oil and lubricant leakages
D – Environment	Soil
	Water
	Biodiversity
	Rehabilitation
E – Cultural Heritage	Archaeological and Heritage
F – Socio- Economic	Employment
	Alcohol and drug abuse
	Working hours
	Capacity building
	HIV / AIDS

SECTION A: STAFF INDUCTION

Table 3. Staff Induction Mitigation Measures

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
Staff Induction	To ensure with the provisions and mandatory requirements of this EMP.	<ul style="list-style-type: none"> • All employees and contractors must undergo an intensive induction course on all the provisions of the EMP. • An annual induction course must be conducted for all workers to reinforce EMP requirements, safety protocols, and environmental responsibilities. • No new employee shall be permitted to commence work without having successfully completed the induction course. 	Induction minutes and attendance register signed by each staff member. Induction report	Management or Site Manager
	Disciplinary	<ul style="list-style-type: none"> • The proponent must adopt a disciplinary system to discipline staff for non-compliance, including offences such as not using ablution 	Disciplinary meetings and actions	Management or Site Manager

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
		<p>facilities and disposing of waste uncontrollably.</p> <ul style="list-style-type: none"> • Ensure strict measures are put in place. Any employee found contravening the provisions of the EMP must be issued a warning letter. 	Disciplinary letters / Warnings	
	A copy of the EMP must be available on site for easy reference.	<ul style="list-style-type: none"> • The Proponent shall ensure that a copy of this Environmental Management Plan (EMP) is kept on site at all times and is readily accessible to all employees. 	Physical view of the EMP	Management or Site Manager
Communication	To ensure effective communication	<ul style="list-style-type: none"> • A clearly defined communication strategy developed. • To ensure clarity and record-keeping, all formal correspondence regarding environmental management, compliance, and project matters must be submitted in writing. 	<p>Communication Strategy</p> <p>Letters, e-mail, notices, minutes</p> <p>Display of site manager and emergency numbers at strategic areas on the site.</p>	Management or Site Manager

Environmental or Social Aspects	Objective	Proposed Mitigation Measures	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> The contact numbers for the Site Manager shall be prominently displayed at key locations on site (e.g., site office, notice board, security gate) to ensure availability during emergencies. An alarm bell shall be installed on site to facilitate emergency communication and alert personnel in the event of an emergency. 		

SECTION B: HEALTH AND SAFETY

Table 4. Health and Safety Measures to be implemented

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
Safety and health	The Principal Contractor and all subcontractors shall strictly comply with the provisions of	<ul style="list-style-type: none"> A compulsory safety induction course must be given to all employees. 	Health and safety included and reflected in the induction minutes	Certification of completion by approved personnel	Management or Site Manager

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
	<p>the Regulations relating to the health and safety of employees at work (Government Notice No. 156 of 1997).</p>	<ul style="list-style-type: none"> • The proponent must develop a health and safety plan. • Each employee must be provided with personal protective equipment (PPE) and must be worn at all time during working hours and when on site. • All light vehicle should have a 2-meter-high red flag mounted on the vehicle • All mining vehicle should be branded. • Ensure all workers are inducted on the dangers of risks of explosions, 	<p>Visual Inspection</p> <p>2-meter red flags on vehicles</p> <p>Vehicles branded</p> <p>Proof of Certification</p>	<p>Visual inspections</p> <p>Visual Inspection</p> <p>Availability of fire extinguishers and evidence on training (e.g. minutes, training pictures etc.).</p>	

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
		<p>chemicals and the emergency response;</p> <ul style="list-style-type: none"> • There must be clear health and safety signs at designated sites such as, ASSEMBLY AREA, NO SMOKING “DANGER”, “ENTRANCE PROHIBITED” etc. • Employees must NOT be exposed to noise levels above the required -85dB (A) limit over a period of 8 hours. Should the noise level be higher than 85dB (A), the employer must implement a hearing conservation program such as noise monitoring; 	<p>Visual Signs available</p> <p>Record of hearing loss</p>	<p>Visible signs</p> <p>Report of health check ups</p>	

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> • Worker must be provided with appropriate PPE such as industrial earmuffs; • Supply safe drinking water to all employees. • Ensure adequate, hygienic and user-friendly ablution facilities for all staff; • Separate male and female toilets with a ration of 1:30 and 1:15 for male and females respectively. • Appoint a cleaner or rotate cleaning responsibilities among workers. • Inspect ablution facilities regularly. 	<p>Clean tap water</p> <p>Clean toilets at all time</p>	<p>Laboratory analysis report</p> <p>Clean toilets at all time</p>	

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
Noise	To reduce noise in the surrounding environment	<ul style="list-style-type: none"> • All mining vehicle and machinery engines must be off when not in use; • Adhere to minimum speed limit of 40km • Purchase/hire mining equipment with low noise emission; • Where possible, fit silencers on vehicle exhaust; • Operation must be limited to daytime only (08h00-17h00); 	Record of public complaints	Record of public complaints	Management / Site Manager
Dust / Air Pollution	To reduce fugitive dust from project operations, appropriate dust suppression measures shall be implemented.	<ul style="list-style-type: none"> • The movement of heavy mining vehicles shall be strictly confined to the delineated mining site boundaries. 		Record of public complain	Management / Site Manager

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> • Only use a one-way lane to access the site; • All vehicles on site must adhere to the prescribed speed limits of either 30 km/h or 40 km/h, depending on the designated zone; • Excavation and trenching activities to access copper ore shall not be conducted during periods of heavy winds; • All sand and/or gravel heaps on site shall be either covered with tarpaulins or other suitable materials, or regularly water sprayed to minimise fugitive dust emissions; 			

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
		<ul style="list-style-type: none"> • On site where soil is loosened by vehicle movement, apply dust suppression methods such as water spraying; • Workers shall not be exposed to excessive dust levels. Appropriate personal protective equipment (PPE), including dust masks and earmuffs, must be provided to all exposed personnel; • Adhere to the Labour Act. Occupational dust exposure limits shall not exceed 5 mg/m³ for respirable dust and 15 mg/m³ for total dust; 			

Environmental / Social Aspects	Objective	Mining phase mitigation measures	Monitoring Indicators	Monitoring Indicators	Responsibility
Blasting	To reduce noise and vibration impacts on the environment.	<ul style="list-style-type: none"> • Prior to any blasting activities, the surrounding community and the nearest police station in Fransfontein shall be notified well in advance of the scheduled blasting date and time. • To minimise environmental impact, only blasting agents classified as environmentally friendly shall be used. • An accredited blaster should be contracted to carry out any required blasting activities. 	<p>Proof of communication</p> <p>Proof of eco-friendly registration.</p> <p>Proof of registration</p>	<p>Records of communication.</p> <p>Records of registration.</p> <p>Blasting certificate</p>	<p>Management / Site Manager</p> <p>Management / Site Manager</p>

SECTION C: POLLUTION CONTROL AND WASTE MANAGEMENT

Table 5. Waste Management Mitigation Measures

Environmental / Social Aspect	Objectives	Mining Phase Mitigation Measures	Monitoring Indicator	Monitoring Indicator	Responsibility
Vehicle Emissions	Greenhouse gas (GHG) emissions from vehicles and machinery must be reduced.	<ul style="list-style-type: none"> All vehicles and equipment shall be maintained in good working order and serviced regularly to prevent fluid leakages and the emission of noxious smoke or other pollutants. To reduce fuel consumption, emissions, and noise, all vehicle and equipment engines shall be switched off when not actively operating. Unnecessary idling is strictly prohibited. 	Vehicle servicing records books Reports of smoke emissions from machinery Visible signs		Management / Site Manager

Environmental / Social Aspect	Objectives	Mining Phase Mitigation Measures	Monitoring Indicator	Monitoring Indicator	Responsibility
Waste Generation	To prevent littering	<ul style="list-style-type: none"> • The mining site shall be equipped with sufficient wheelie bins and skip containers to facilitate proper on-site waste disposal; • All waste generated on site must be segregated at source and disposed of at an approved waste disposal site in Khorixas; • The burial of waste on site or anywhere in the surrounding area is strictly prohibited; • Provide facilities toilets for workers in a ratio of 1:15 for females and 1:30 for males. 	Waste bins and skip containers	Waste bins and skip containers	Management / Site Manager

Environmental / Social Aspect	Objectives	Mining Phase Mitigation Measures	Monitoring Indicator	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Effluent from these toilets must be disposed of at the nearest and approved waste treatment plant of oxidation ponds at Fransfontein or Khorixas. • All personnel must use the designated toilet facilities provided. Any violation of this rule shall result in disciplinary action. 	Record of effluent disposal		
Surface and ground water contamination / pollution	To prevent soil and water pollution	<ul style="list-style-type: none"> • All vehicles and machinery must be in good condition and well serviced to prevent oil and lubricant leaks; • All stationary vehicles and machinery must have drip trays to collect leakages of oils and lubricant; 	Service records Visible drip trays Proper storage with concrete bund surface		Management / Site Manager

Environmental / Social Aspect	Objectives	Mining Phase Mitigation Measures	Monitoring Indicator	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> Oils, lubricants, and hydrocarbons shall be stored in a dedicated storage facility equipped with either concrete bunds or impermeable lined materials to contain any potential spills. Although not expected to be significant for instance, oil drops of less than 500ml if such spills occur, contaminated soils must be collected and treated with bioremediation. 	Bioremediation chamber		
Oil Spillages	To prevent oil spill from tanks and during re-fuelling	<ul style="list-style-type: none"> Refuel vehicles at designated areas that has protected surface covering /geomembrane 	Place warning signs	Site inspection and record keeping	Management / Site Manager

Environmental / Social Aspect	Objectives	Mining Phase Mitigation Measures	Monitoring Indicator	Monitoring Indicator	Responsibility
		<p>lining and use drip trays for stationary equipment and vehicle.</p> <ul style="list-style-type: none"> The Proponent shall engage with suppliers of consumables, such as grease and lubricants, to arrange for the collection and environmentally sound disposal of used waste materials. 			
Oil leakage	To prevent fuel leakages	<ul style="list-style-type: none"> Ensure that stationary vehicle have drip trays underneath to collect any leakages of oils, lubricants, or other fluids. 	Trays placed underneath stationary vehicles.	Visible monitoring	Management and Site Manager

SECTION D: ENVIRONMENT

Table 6. Environmental Mitigation Measures to be implemented

Aspect	Objective	Mining mitigation measure	Monitoring Indicator	Responsibility
Biodiversity	To protect the flora and fauna	<ul style="list-style-type: none"> • The mining claim sites shall be cordoned off to avoid safety risks to wildlife and domestic animals. • The destruction of protected species including fauna, flora, and avian fauna shall be strictly prevented. • Employees shall be strictly prohibited from collecting firewood on or around the project site. • Workers are strictly prohibited from collecting plant materials, hunting, or snaring wild animals on or around the project site. • The Proponent shall provide gas for cooking and heating to staff in order to discourage the harvesting of firewood. • No poaching of any wild animals or plants shall be permitted. 		Management / Site Manager

Aspect	Objective	Mining mitigation measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Any suspicious activities observed on or near the site shall be reported immediately to the nearest police station in Fransfontein. • No killing of animals including crawling animals unless it poses danger to human life. • No domestic animals are allowed at the site. 		
Soil Erosion	To prevent soil erosion	<ul style="list-style-type: none"> • All mining activities shall be confined strictly to the delineated mining claim boundaries. • It is strongly suggested that mining activities cease or not take place during periods of heavy winds; • Excavated topsoil from mining trenches shall be properly compacted to avoid wind erosion and loss of valuable soil resources; • Movement of all vehicles must strictly be within the project site; • All sand and gravel heaps resulting from excavation activities must be placed in clearly demarcated, designated areas. This measure prevents uncontrolled spreading of materials, 		Management / Site Manager

Aspect	Objective	Mining mitigation measure	Monitoring Indicator	Responsibility
		<p>facilitates site organisation, and supports future rehabilitation efforts.</p> <ul style="list-style-type: none"> • Upon completion of the project, all disturbed areas including mining pits, trenches, stockpile areas, and access roads shall be rehabilitated to a stable, non-polluting, and self-sustaining condition suitable for the agreed post-closure land use. 		
Soil Compaction	To prevent flooding and waterlogging in surrounding area.	<ul style="list-style-type: none"> • To minimise environmental impact, all vehicles and mining equipment must remain on existing roads and designated tracks. Off-road driving is strictly prohibited unless authorised for specific activities. • Implement a road and track management. 		Management / Site Manager
Water Resource	Conservation of water resource	<ul style="list-style-type: none"> • A valid water abstraction permit should be obtained from the Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR). • The release of any pollution or contaminant into the water ecosystem is strictly prohibited. 	Valid water abstraction permit.	Management / Site Manager

Aspect	Objective	Mining mitigation measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • implement water recycling systems and actively promote the reuse of water wherever technically and economically feasible. • Monitor and control water usage, and minimise where possible. 		
Visual and Sense of Place	Maintain aesthetic value	<ul style="list-style-type: none"> • Pit and excavated area should be levelled upon completion. • Rehabilitation efforts shall extend beyond ecological recovery to include visual integration. Care must be taken to ensure that all rehabilitated areas including pits, trenches, and stockpile sites blend naturally with the surrounding landscape. • As part of the rehabilitation process, overburden must be returned to excavated trenches and pits. • The Proponent shall ensure that the site is kept visually clean at all times. This includes prompt removal of litter, waste, and debris, as well as orderly storage of materials and equipment. 		
Alien Invasive	Maintain natural ecosystem	<ul style="list-style-type: none"> • All alien invasive species occurring within the project area shall be cleared using approved 		

Aspect	Objective	Mining mitigation measure	Monitoring Indicator	Responsibility
		<p>control methods. Follow-up treatments shall be conducted to prevent re-establishment.</p> <ul style="list-style-type: none"> • The Proponent shall implement appropriate measures to eradicate any alien infestation occurring within the project area. • The proponent shall adopt a formal alien clearing policy and implement an awareness campaign for all personnel and local community. 		

SECTION E: HERITAGE AND ARCHEOLOGICAL SITES

Table 7. Archaeology and Heritage Mitigation Measures

Environment / Social Aspect	Objectives	Mining phase mitigation measure	Monitoring Indicator	Responsibility
Heritage Resources / Artefacts	Preserve Heritage and Archaeological materials	<ul style="list-style-type: none"> • The management should be made aware of the provision of the National Heritage Act regarding prompt reporting of any archaeological findings. • Workers must be trained on the possible findings of archaeological material and artefacts in the area; 	Sighting report/s of heritage resources / artefacts	Management / Site Manager

Environment / Social Aspect	Objectives	Mining phase mitigation measure	Monitoring Indicator	Responsibility
		<ul style="list-style-type: none"> • Implement a chance find and steps to be taken when archaeological material findings (Heritage e.g. rock painting and drawings), human remains or artefacts) are unearthed • Stopping the activity immediately • Informing the site manager or supervisor • Cordoned of the area with a danger tape and the manager shall take appropriate pictures. • Site manager must report the finding to the nearest Namibian police or alternatively the National Forensic Laboratory (+264 61 240461). 		

SECTION F: SOCIO ECONOMIC

Table 8. Social Economic Mitigation Measures

Environmental / Social Aspects	Objectives	Mining phase mitigation Measures	Monitoring Indicator	Responsibility
Employment	Promote benefits to the local resident	<ul style="list-style-type: none"> • Adopt local first policy whereby preference is given to local residents for all general work positions. Only where specialised skills are not available locally may recruitment from outside the area be considered. • Prioritise the employment of local contractors for project-related work, provided they meet the required technical and safety standards. • Adhere to fair compensation and labour practices in accordance with the Labour Act, 2007 (Act No. 11 of 2007) and all relevant Namibian labour regulations. 	Employee structure and proportion of local employment	Management or Site Manager
HIV/AIDS	To prevent the spread of HIV/AIDS	<ul style="list-style-type: none"> • The Proponent shall provide HIV/AIDS awareness training to all employees during their induction. The training shall 		

Environmental / Social Aspects	Objectives	Mining phase mitigation Measures	Monitoring Indicator	Responsibility
		<p>cover prevention measures, the importance of reducing stigma, and access to support and testing services.</p> <ul style="list-style-type: none"> As part of the workplace wellness and HIV prevention programme, the Proponent shall ensure that condoms are freely available and easily accessible to all employees at designated locations on site. 		
Alcohol and Drug use	Prevent alcohol and drug use	<ul style="list-style-type: none"> Enforce a strict ban on the use, possession, or distribution of alcohol and illegal drugs at the workplace. Any employee or contractor found in violation shall face disciplinary action, up to and including dismissal. Provide training to all employees on the dangers of alcohol and substance abuse, including the impact on personal health, workplace safety, and job performance. This training shall be 	<p>Drunk / Misbehaving employees Breathalyser report</p> <p>Monitor presence of alcohol at the site.</p>	Management or Site Manager

Environmental / Social Aspects	Objectives	Mining phase mitigation Measures	Monitoring Indicator	Responsibility
		<p>included in the induction programme and reinforced periodically.</p> <ul style="list-style-type: none"> To maintain a safe working environment, the Proponent shall implement mandatory daily breathalyser screening for all employees prior to commencing work. Any employee found to be intoxicated shall be refused site access and subject to disciplinary action. 		
Working hours	Adhere to the Labour Act No. 11 of 2007	<ul style="list-style-type: none"> The Proponent shall ensure that all operations are conducted within the prescribed working days and hours as set out in the Namibian Labour Act, 2007 (Act No. 11 of 2007) and any applicable sectoral regulations. 	Labour unrest / Demonstration	Management or Site Manager

8. DECOMMISSIONING PHASE

The decommissioning of a mining project is generally considered to be a complex and lengthy process. This complexity arises from the fact that decommissioning encompasses multiple interrelated activities, including the removal of hazardous materials, rehabilitation of the disturbed environment, demolition of structures and infrastructure, and remediation of both soil and groundwater. Due to the high global market demand for the minerals occurring in the area specifically copper which is considered to be among the critical in the manufacturing of technological equipment and electric component the decommissioning of this project is not expected to take place in the immediate or near future. Nevertheless, proactive planning for eventual closure is essential. The proponent, together with their investors, is hereby advised to integrate mine closure and rehabilitation costs into their operational budget from the outset. Furthermore, a dedicated rehabilitation fund should be established to ensure that adequate financial resources are available for rehabilitation purposes when decommissioning eventually occurs. In addition to financial planning, a mining rehabilitation advisory committee should be constituted to provide oversight and guidance on rehabilitation matters. A comprehensive rehabilitation plan should be formulated by a competent, independent consultant with relevant expertise in mining closure and environmental restoration. All necessary applications required from the relevant authorities (including the Ministry of Environment, Forestry and Tourism and any other applicable regulatory bodies) must be applied for in accordance with applicable legal requirements. Therefore, the project proponent together with their technical and financial partners must implement the following mitigation measures during the decommissioning phase; the proponent must submit a decommissioning plan to the Office of the Environmental Commissioner for formal approval prior to commencement of any decommissioning activities, install clear and visible signs to inform the public about the decommissioning of the project and to warn of any potential hazards, access to all decommissioning areas must be controlled and restricted to authorized personnel only. A qualified project geologist and a qualified mining engineer must be hired to oversee the project decommissioning process. An environmental specialist must be contracted to monitor restoration and all possible contamination (including soil, water, and air quality) throughout the decommissioning process. Ensure that all trenches and excavated areas are properly rehabilitated and restored. Ensure that all topsoil is levelled and, where appropriate, replaced to support revegetation. Provide all workers with all necessary Personal Protective Equipment (PPE) appropriate to the decommissioning of hazardous materials. Where contamination is detected, the soil in the affected excavated area or trenches must be excavated, removed, and treated appropriately before being disposed of at an approved site. The use of phyto-remediation techniques is strongly encouraged during

the rehabilitation. The entire site must be rehabilitated to a condition that resembles its natural environment to the greatest extent practicable.

9. CONCLUSION AND RECOMMENDATIONS

Mining activities are widely recognized as having the potential to cause serious negative repercussions on the environment. However, where a project is executed in a correct and responsible manner specifically, where environmental considerations are genuinely taken into account during planning, construction, operation, and decommissioning the associated impacts can be reduced to a negligible level. With respect to the proposed small-scale mining project for base metals and rare metals, and semi-precious stones on mining claims; 75276 and 75277, the following is asserted, if the project is carried out with in-depth environmental considerations, the potential adverse impacts will be effectively ameliorated. The recommendations and mitigation measures set forth in this Environmental Management Plan (EMP) will be integral to ensuring that correct environmental approaches are implemented. These approaches aim to; reduce negative impacts to the lowest practicable level and amplify any positive impacts associated with the project. The information contained in the Scoping Environmental Assessment Report, together with the information presented in this EMP, is adequate to enable the Office of the Environmental Commissioner to make an informed, objective decision regarding the environmental impacts of the proposed mining project. On the basis of the foregoing, it is recommended that the project be approved and that the Ministry of Environment, Forestry and Tourism: Directorate of Environmental Affairs (MEFT: DEA) issue an Environmental Clearance Certificate (ECC) for the establishment of mining activities for base metals and rare metals and semi-precious stones on mining claims; 75276 and 75277. Consequently, it is respectfully submitted that the project must be approved. There is a need for continuous and persistent monitoring of the project's operations to verify ongoing compliance with the EMP and the ECC. The proponent must appoint an Environmental Practitioner to undertake impartial environmental audits. All environmental bi-annual and audit reports must be submitted to the Office of the Environmental Commissioner in accordance with the frequency and format prescribed by the EMA or the ECC. The Environmental Practitioner appointed by the proponent (of the proponent's choice) must conduct uninterrupted, independent, and impartial environmental audits.