



ECC
ENVIRONMENTAL
COMPLIANCE CONSULTANCY



ECC DOCUMENT CONTROL: ECC-94-214-REP-06-D

ENVIRONMENTAL MANAGEMENT PLAN

EXPLORATION ACTIVITIES ON EPL 6155 FOR PRECIOUS STONES

//KARAS REGION

PREPARED FOR



GRIEP
DIAMONDS

P.O. BOX 35 KEETMANSHOOP NAMIBIA

AUGUST 2019

TITLE AND APPROVAL PAGE

Project Name:	Exploration Activities on EPL 6155 for Precious Stones, //Karas Region
Project Number	ECC-94-214-REP-06-A
Client Name:	Gariep Diamonds
Ministry Reference:	NA
Status of Report:	Final for Submission
Date of issue:	August 2019
Review Period	NA

Environmental Compliance Consultancy Contact Details:

We welcome any inquiries regarding this document and its content please contact:

Stephan Bezuidenhout

Environmental Consultant & Practitioner
Tel: Tel: +264 81 669 7608
Email: stephan@eccenvironmental.com
www.eccenvironmental.com

Jessica Mooney

Environmental Consultant & Practitioner
Tel: Tel: +264 81 669 7608
Email: jessica@eccenvironmental.com
www.eccenvironmental.com

Confidentiality

Environmental Compliance Consultancy Notice: This document is confidential. If you are not the intended recipient, you must not disclose or use the information contained in it. If you have received this document in error, please notify us immediately by return email and delete the document and any attachments. Any personal views or opinions expressed by the writer may not necessarily reflect the views or opinions of Environmental Compliance Consultancy.

Please note at ECC we care about lessening our footprint on the environment, therefore all documents are printed double-sided.

TABLE OF CONTENTS

1	INTRODUCTION	6
1.1	Project Background	6
1.2	Environmental Regulatory Requirements	6
1.3	Purpose and Scope of this Report	7
1.4	Management of this EMP.....	7
1.5	Limitations, Uncertainties, and Assumptions of this EMP	7
1.6	Environmental Consultancy	7
1.7	Structure of this EMP	8
2	ENVIRONMENTAL MANAGEMENT FRAMEWORK	9
2.1	Objectives and Targets	9
2.2	Organisational Structure, Roles and Responsibilities	9
2.3	Contractors.....	10
2.4	Employment	10
2.5	Register of Environmental Risks and Issues	11
3	COMMUNICATION AND TRAINING	16
3.1	Communications	16
3.2	Environmental Emergency and Response.....	16
3.3	Complaints Handling and Recording	17
3.4	Training and Awareness	17
3.5	Site Induction	17
4	INCIDENT REPORTING	18
4.1	Minor Incident or “Near Miss”	18
4.2	Serious Incident.....	18
4.3	Incident Report and Close Out	18
5	COMPLIANCE AND ENFORCEMENT	19
5.1	Environmental Inspections & Compliance Monitoring	19
5.2	Compliance to the National Park	19
5.3	Compliance to Environmental Permits	22
5.4	Water Permits and Licence	22
5.5	Wastewater discharge permit.....	22
5.6	Reporting.....	22
5.7	Non- Compliance.....	22
5.8	Disciplinary Action.....	23
6	SURFACE AND GROUNDWATER MANAGEMENT PLAN	24
6.1	INTRODUCTION	24

6.2	OBJECTIVES.....	24
6.3	RESPONSIBILITIES	24
6.4	SURFACE AND GROUNDWATER MANAGEMENT MEASURES	24
6.5	SURFACE AND GROUNDWATER QUALITY MONITORING PROGRAMME	25
7	WASTE MANAGEMENT PLAN	26
7.1	INTRODUCTION	26
7.2	OBJECTIVES.....	26
7.3	ROLES AND RESPONSIBILITIES	26
7.4	SOLID WASTE.....	26
7.5	WASTE DISPOSAL MONITORING.....	27
8	SPILL MANAGEMENT PLAN	28
8.1	INTRODUCTION	28
8.2	OBJECTIVES.....	28
8.3	ROLES AND RESPONSIBILITIES	28
8.4	SPILL PREVENTION MEASURES	28
8.5	SPILL RESPONSE MEASURES	29
8.6	SPILL REPORTING	30
9	AIR QUALITY MANAGEMENT PLAN	31
9.1	INTRODUCTION	31
9.2	OBJECTIVES.....	31
9.3	RESPONSIBILITIES	31
9.4	AIR QUALITY MANAGEMENT PROCEDURES	31
9.5	AIR QUALITY MONITORING PROGRAMME.....	32
9.6	NOISE IMPACTS	32
10	IMPLEMENTATION OF THE EMP.....	33
	APPENDIX A: APPLICATION FOR A WASTEWATER DISCHARGE LICENCE.....	34
	APPENDIX B - REPORTING OF MAJOR PETROLEUM PRODUCT SPILL FORM PP/11	41

TABLES

TABLE 1 – ROLES AND RESPONSIBILITIES 10

TABLE 2 – ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES 12

TABLE 3 - EMERGENCY CONTACT DETAILS 16

TABLE 4 - CONDITIONS TO OPERATE IN PROTECTED AREAS 20

TABLE 5 - WATER QUALITY MITIGATION MEASURES 24

TABLE 6 - WASTE MITIGATION MEASURES 27

TABLE 7 - SPILL MITIGATION MEASURES..... 29

TABLE 8 - AIR QUALITY MITIGATION MEASURES 32

FIGURES

FIGURE 1 - LOCATION OF THE EPL 6155 6

DEFINITIONS AND ABBREVIATIONS

ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
MET	Ministry of Environment and Tourism
MME	Ministry of Mines and Energy
PM	Project Manager
ARTFP	/Ai-/Ais-Richtersveld Transfrontier Park
MSDS	Material Safety Data Sheet
PPE	Personal Protective Equipment

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (ECC) has compiled this Environmental Management Plan (EMP) in terms of the Environmental Management Act, 2007 on behalf of Gariep Diamonds. Gariep Diamonds is seeking to explore mining opportunities and propose to undertake exploration activities on EPL 6155 for Precious Stones in the //Karas Region.

EPL 6155 is located in the /Ai-/Ais-Richtersveld Transfrontier Park (ARTFP) and stretches across the Orange River, into South African boundaries. The NamWater Plant is located within the EPL site. The EPL boundaries are approximately 16. 27 km south-east of Rosh Pinah with the C13 route cross-cutting from the north throughout the EPL as illustrated in Figure 1.

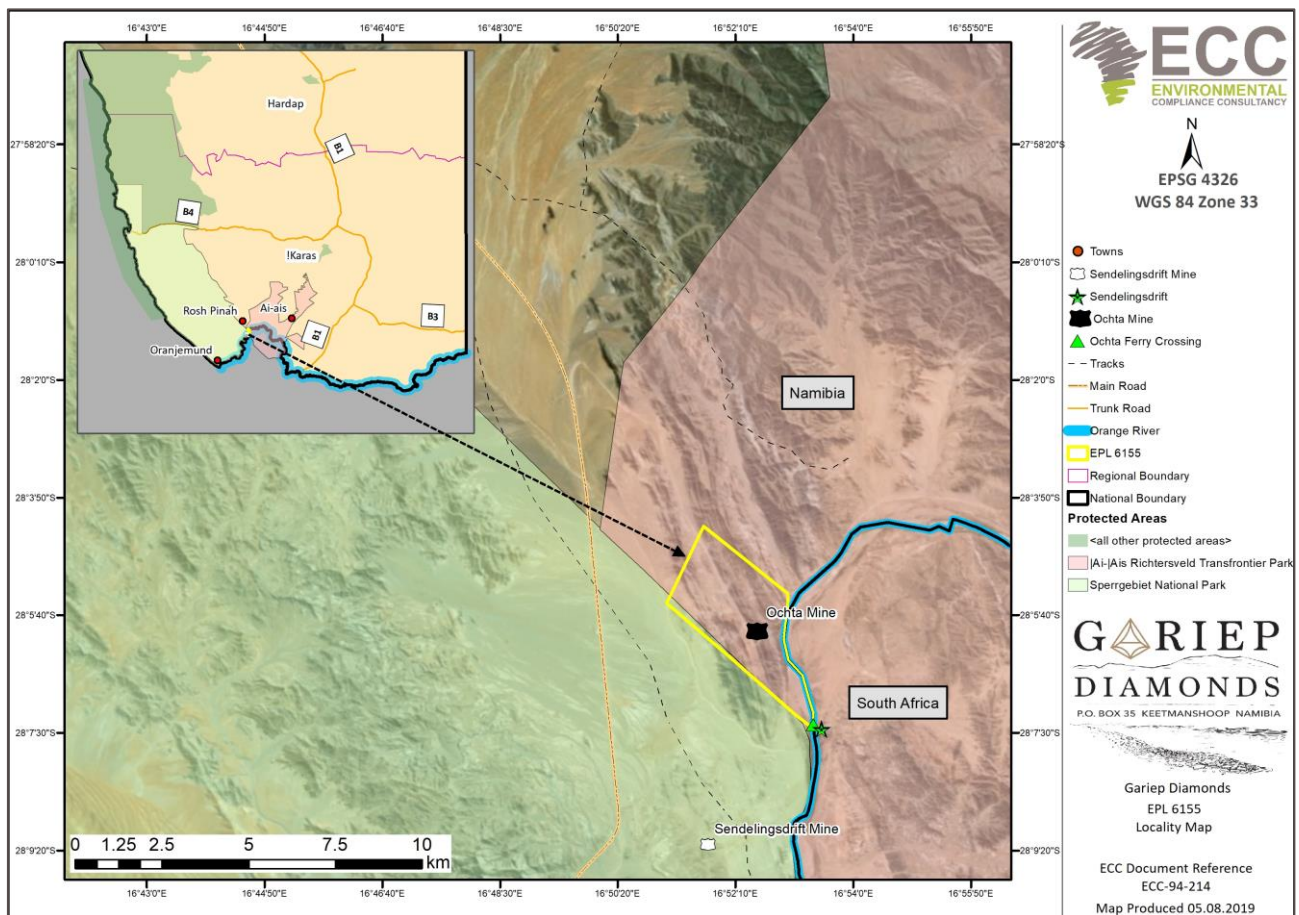


FIGURE 1 - LOCATION OF THE EPL 6155

1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed project is considered as a listed activity as stipulated in the Environmental Management Act 7 of 2007 and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011). Therefore, an application for an environmental clearance certificate is to be submitted. An Environmental Scoping Report and Environmental Management Plan (EMP) are required to be submitted as part of the application process, as well as to support the decision-making process. This report presents the EMP and has been undertaken in terms of the requirements of the Environmental Management Act, 2007 and its Regulations.

1.3 PURPOSE AND SCOPE OF THIS REPORT

This EMP provides a logical framework, mitigation measure and management strategies for the exploration activities associated with the proposed project, in this way ensuring that the potential environmental and social impacts are mitigated and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the EMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

The EMP forms an appendix to the environmental scoping report and is based on the findings of the assessment; therefore, the environmental scoping report should be referred to for further information on the proposed project, assessment methodology, applicable legislation, and assessment findings.

This EMP is a live document and shall be reviewed at predetermined intervals, and/or updated when the scope of works alters, or when further data /information is added. All personnel working on the project will be legally required to comply with the standards set out in this EMP.

The scope of this EMP includes all activities carried out during the exploration stage in search of Precious Stones on EPL 6155.

1.4 MANAGEMENT OF THIS EMP

The proponent, Gariep Diamonds will hold the environmental clearance certificate for the proposed project and shall be responsible for the implementation and management of this EMP. Before the exploration activities commencing, this EMP will be reviewed, amended as required and approved ready for implementation. The implementation and management of this EMP and thus the monitoring of compliance shall be undertaken through daily duties and activities and monthly inspections.

This EMP shall be circulated to all contractors and shall be made available on the Environmental Compliance Consultancy's (ECC) website.

1.5 LIMITATIONS, UNCERTAINTIES, AND ASSUMPTIONS OF THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the safety management plan to be developed by the proponent.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines, and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the environmental scoping report. Where the design or construction methods alter, this EMP may require updating and potential further assessment may be undertaken.

1.6 ENVIRONMENTAL CONSULTANCY

ECC, a Namibian consultancy (registration number Close Corporation 2013/11401), has prepared this EMP on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa, in both the public and private sectors. ECC is independent of the proponent and has no vested or financial interest in the proposed project, except for fair remuneration for professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or posted to the following address:

Environmental Compliance Consultancy
PO BOX 91193
Klein Windhoek, Namibia

Tel: +264 81 669 7608

Email: info@eccenvironmental.com

1.7 STRUCTURE OF THIS EMP

The report has the following structure:

- Chapter 1 – Introduction
- Chapter 2 – Project Management Personnel
- Chapter 3 – Communication and Training
- Chapter 4 – Compliance and Enforcement
- Chapter 5 – Environmental and Social Management
- Chapter 6 – Implementation of the EMP

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

This EMP provides measures, guidelines, and procedures for managing and mitigating potential environmental impacts. The EMP also indicates monitoring and reporting guidelines and sets responsibilities for those carrying out management and mitigation measures.

2.1 OBJECTIVES AND TARGETS

Environmental objectives and targets have been developed so that exploration activities can minimise potential impacts on the environment, as far as reasonably practicable.

Environmental objectives for the project are as follows:

- Zero pollution incidents
- Minimal vegetation clearing and earthworks
- Protect local flora and fauna, and
- Use natural resources effectively and efficiently.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

The proponent shall provide a project team to oversee and undertake the preparation and exploration activities, which will be composed of the proponent's personnel and contractors. A nominated role shall be identified to ensure the management and implementation of this EMP is throughout the project, which will be supported by the proponent.

The proponent shall be responsible for:

- Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP
- Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfill this requirement
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood, and
- Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed above.

The key personnel and environmental responsibilities of each role through the project life are presented in Table 2.

TABLE 1 – ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES & DUTIES
Proponent	<ul style="list-style-type: none"> - Responsible for the management and implementation of the EMP - Ensure environmental policies are communicated to all personnel throughout the proposed project and that employees understand the guidelines of the EMP - Responsible for providing the resources required to complete the project tasks - Appoint a site manager and project manager, and - Ensure all workers are inducted on safety measures.
Exploration Management	<ul style="list-style-type: none"> - Oversee exploration activities - Monitor daily operations and ensure adherence by personnel to the EMP - Maintain the community issues and concerns register and keep records of complaints, and - Maintain an up to date register of employees who have completed site induction.
Site Manager	<ul style="list-style-type: none"> - Ensure that all contract workers, sub-contractors and visitors to the site are aware of the requirements of this EMP, relevant to their roles and always adhere to this EMP - Report any non-compliance or accidents to the PM - Receive, recording and responding to complaints - Ensure adequate resources are available for the implementation of the EMP - Ensure safe and environmentally sound operations, and - Responsible for the management, maintenance, and revisions of this EMP.
Employees	<ul style="list-style-type: none"> - Adhere to measures set out in the EMP - Ensure they have undertaken a site induction, and - Report any operations or conditions which deviate from the EMP as well as any non-compliant issues or accidents to the environmental manager

2.3 CONTRACTORS

Any contractors hired during the exploration activities and accessory works for the project duration shall be compliant with this EMP and shall be responsible for the following:

- Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements
- Implementing appropriate environmental and safety management measures
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the site manager and/or PM, and
- Ensuring appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported by employees and subcontractors.

2.4 EMPLOYMENT

The proponent and all contractors shall comply with the requirements of the Republic of Namibia Regulations for Labour, Health and Safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government and community authorities, the proponent shall ensure that local people have access to information about job opportunities and are considered first for construction/maintenance contract employment positions
- The number of job opportunities shall be made known together with the associated skills and qualifications. The maximum length of time the job is likely to last for shall be indicated

- Foreign workers with no proof of permanent legal residence shall not be hired, and
- Every effort shall be made to recruit from the pool of unemployed workers living in the surrounding area.

2.5 REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the proposed project has been completed to identify all the commitments and agreements made within the environmental scoping report. A list of environmental commitments and risks has been produced, which details deliverables including measures identified for the prevention of pollution or damage to the environment during the exploration phase.

Table 3 provides a register of environmental risks and issues, which identifies mitigation and monitoring measures, as well as roles responsible. This register will be subject to regular review by the project manager and updated when necessary. The project manager and site manager will use this register to undertake monthly inspections (see next section) to ensure the project is compliant with this EMP.

TABLE 2 – ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES

RECEPTORS	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Surface water	<ul style="list-style-type: none"> - Trenching and pitting could penetrate the groundwater table, and - Any hazardous fluid or lubricating chemicals used could enter the aquifer causing pollution 	<ul style="list-style-type: none"> - Refuelling shall be undertaken in a designated area - All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil - In the event of pollution, polluted soils must be collected and disposed of at an approved site - A 'good housekeeping' policy shall be adopted across the exploration area, and - Extraction volumes of water shall be minimal during exploration and where possible, water from existing water sources shall be used. 	<ul style="list-style-type: none"> - Daily and weekly observations for any leakage - Maintain a record of all abstracted volumes and report to MAWF as per permit conditions - Install water flow meters if required. 	Exploration manager
Soil	<ul style="list-style-type: none"> - Fuel handling and storage can cause spillages that lead to groundwater contamination and soil contamination. 	<p>Safe Delivery and handling:</p> <ul style="list-style-type: none"> - Training employees and toolbox talks - Good housekeeping across the site - Fuel is handled with care - Spill kits to be at designated areas across the site or available for use during refueling, fuel delivery or use. Absorption material should be available and at hand. Where sawdust is used it should be cleaned up immediately and not left for long periods as this poses a fire hazard. - Any major spill is reported to the PM once containment has been achieved. - Plant and equipment to be well maintained and serviced regularly. - In the field, the use of hydrocarbons under 200 litres can be used for mobile refueling or servicing. <p>Storage:</p> <ul style="list-style-type: none"> - All tanks to be stored on a non-porous floor and bunded area. - Bund to be capable of storing at least 110% of the volume of the tank - All containers to be suitable for use and not damaged - Tanks are locked at all times - Spill kits available at storage locations and around the site is suitable locations <p>Refueling</p> <ul style="list-style-type: none"> - Drip tray to be used during refueling of vehicles and on an impermeable flat surface where possible. 	<ul style="list-style-type: none"> - Daily observations when fuels are delivered and handled - Supervision during refueling - Weekly observations monitor containment and storage 	Exploration manager

RECEPTORS	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<ul style="list-style-type: none"> - A funnel should be available and used to avoid spillage during decanting 		
	<ul style="list-style-type: none"> - Trenching and pitting can cause a changes to soil and landscape 	<ul style="list-style-type: none"> - Topsoil should be separately stockpiled to be re-spread when backfilling - Equipment must be in good condition to ensure that the oil spills do not contaminate the site - Ensure soils are replaced in layers in which they were removed - Ensure operations of gravel processing takes due consideration of soil placement and replacement, ensure landscaping and shaping of landform post gravel processing takes places to resemble natural background. 		
Socio-economic	<ul style="list-style-type: none"> - Employment creation and skills development - Opportunities during the exploration phase (Approx. 10-20 jobs) 	<ul style="list-style-type: none"> - Maximise local employment and local business opportunities to promote and improve the local economy - Enhance the use of local labour and local skills as far as reasonably possible. Where the required skills do not occur locally, and where appropriate and applicable, ensure that relevant local individuals are trained, and - Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible 	<ul style="list-style-type: none"> - Daily observations - Weekly checks 	<ul style="list-style-type: none"> - Exploration manager - Employees
Terrestrial and ecology	<ul style="list-style-type: none"> - Possible injury or death of animals - Poaching - Habitat fragmentation from clearing, pitting and trenching - Habitat loss from excessive clearing 	<ul style="list-style-type: none"> - Use existing tracks where possible - Route new tracks around established and protected trees, and clumps of vegetation - Identify rare, endangered, threatened and protected species and demarcate them and avoid cutting them down or removing them. - All workers on-site are to be notified to avoid any excluded areas or species - Progressive rehabilitation during the exploration phase should apply - Natural drainage patterns should be restored, and - Relocation of protected plant species if disturbance cannot be avoided. - No driving off designated access routes (into the bush) / off-road driving - No snares or catching of animals, no keeping or housing of pets for food - No animals or birds may be collected, caught, consumed or removed from the site by the contractor or personnel on site - Ensure all trenches are backfilled upon completion 	<ul style="list-style-type: none"> - Daily visual inspection during construction of new access tracks/widening 	<ul style="list-style-type: none"> - Exploration manager - Employees - Site manager
Air quality	<ul style="list-style-type: none"> - Dust generation can 	<ul style="list-style-type: none"> - Use existing access roads and tracks where possible 	Daily observations	<ul style="list-style-type: none"> - Exploration

RECEPTORS	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
	<p>impact public health and visibility</p> <ul style="list-style-type: none"> – Impact on fauna and flora 	<ul style="list-style-type: none"> – Apply dust suppression method such as water spraying during trenching or digging if excessive dust is generated – Restricted vehicle speeds to reduce dust (<30km/h) – Provide protective masks and eyeglasses to employees in dusty working environments – Specific activities that may generate dust shall be avoided during high wind events, e.g. soil preparation activities – Avoid off-road driving 		<p>manager</p> <ul style="list-style-type: none"> – Site manager
Heritage	<p>Impact on viewshed/landscape surrounding heritage features</p>	<p>If the discovery of unearthed archaeological remains to be uncovered, the following measures (chance find procedure) shall be applied:</p> <ul style="list-style-type: none"> – Works to cease, area to be demarcated with appropriate tape by the site supervisor, and the Site Manager to be informed – Site Manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary – If work cannot proceed without damage to findings, Site Manager is to inform the Environmental Manager who will get in touch with an archaeologist for advice – An archaeological specialist is to evaluate the significance of the remains and identify appropriate action, for example, record and remove; relocate or leave in situ (depending on the nature and value of the remains) – Inform the police if the remains are human, and – Obtain appropriate clearance or approval from the competent authority, if required, and recover and remove the remains to the National Museum or National Forensic Laboratory as appropriate. 	<p>Site assessment prior to exploration or gravel processing to identify any potential areas of significance.</p> <p>Daily observations</p>	<ul style="list-style-type: none"> – Exploration manager – Site manager
Resource use	<p>Inefficient use of water resources</p>	<p>Use water effectively and efficiently by following the reduce, recycle and use approach.</p> <p>Record volumes abstracted from the Orange river and report to MAWF or as per permit conditions.</p>	<p>Daily observations</p>	<ul style="list-style-type: none"> – Exploration manager – Employees
Community Environment	<ul style="list-style-type: none"> – Nuisances (odours and visual), and 	<ul style="list-style-type: none"> – Training and toolbox talk to workers shall be provided – Ensure good housekeeping across the site 	<ul style="list-style-type: none"> – Daily observations Weekly checks 	<ul style="list-style-type: none"> – Exploration manager

RECEPTORS	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
	<ul style="list-style-type: none"> - Litter (nuisance and ecological risk) - Damage, disturbance or interference with research equipment or experiments 	<ul style="list-style-type: none"> - Implement the waste management hierarchy across the site: avoid, reuse, and recycle - Waste shall be collected and shall be removed regularly to avoid bad odours - It is unlikely that hazardous material and wastes will be produced, however, if they do, they shall be managed safely and responsibly to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials, and - Hazardous and non-hazardous waste shall be stored separately at all times - Identify research equipment or experiments and ensure zero damage or disturbance - No persons shall enter the National park or nature reserve with a plastic bag unless; <ul style="list-style-type: none"> o Designated to be used for the disposal of waste; o Designated for agricultural purposes; o Used for sampling or analysis; o That constitutes or form an integral part of, the packaging in which goods are sealed prior to sale in the local market or for export; or o That it is a transparent resealable bag 		<ul style="list-style-type: none"> - Employees

3 COMMUNICATION AND TRAINING

In order to ensure potential risks and impacts are minimised it is vital that personnel are appropriately informed and trained to ensure risks are mitigated. It is also important that regular communications are maintained with stakeholders (if applicable) and made aware of potential impacts and how to minimise or avoid them. This section sets out the framework for communication and training in relation to the EMP.

3.1 COMMUNICATIONS

During exploration, the PM and Site Manager shall communicate site-wide environmental issues to the project team through the following means (as and when required):

- Ensure all personal are afforded the opportunity to attend an environmental site induction that sets out their requirements in relation to this EMP
- Ensuring audits and inspections are undertaken regularly on a risk-based schedule
- Toolbox talks, including instruction on incident response procedures
- Deliver project-specific environmental briefings where required
- Ensure all personnel have access to the EMP
- Ensure operators of key activities and environmentally sensitive operations are briefed and understand their requirements.

This EMP shall be distributed to the exploration team including any contractors and personnel working on the exploration site to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations shall be briefed to workers and contractors.

During the exploration activities, communications between the management team shall include discussing any complaints received and actions to resolve them; any inspections, audits or non-conformance with this EMP; and any objectives or target achievements.

3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

TABLE 3 - EMERGENCY CONTACT DETAILS

TOWN	AMBULANCE	POLICE	FIRE BRIGADE
LUDERITZ	+264 63 20-2446	+264 63 1-0111	+264 63 20-2255
ROSH PINAH	063 274 918	-	-

For large-scale spills and other significant environmental incidents, the fire services should be contacted as required and the MET office informed of the incident (telephone +264 61 284 2111). All correspondence with MET should be undertaken by the manager.

For the clean-up of smaller spills, the relevant Material Safety Data Sheet (MSDS) should be consulted to determine the appropriate clean-up procedure. Basic spill response training will be provided as part of the site environmental induction, spill response equipment, including relevant MSDS copies, will be provided in areas where potentially environmentally hazardous chemicals may be used.

3.3 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the project site shall be recorded by the receiver, including the name and contact details of the complainant, date and time of the complaint, and the nature of the complaint. The information shall be given to the project manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The project manager shall inform the site manager of issues, concerns or complaints. The project manager must maintain a complaint register that details the name of the complainant, date and time of the complaint, the action is taken to resolve the issues and date of complaint handover.

The workforce shall be informed about the complaints register, its location and the person responsible, to refer residents or the general public who wish to lodge a complaint. The complainant shall be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons why are to be recorded in the register.

The complaints register shall be kept for the duration of the project and will be available for government or public review upon request.

3.4 TRAINING AND AWARENESS

All personnel working on the project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training, and experience.

3.5 SITE INDUCTION

All personnel involved in the project shall be inducted to the site with a specific environment and social awareness training, and health and safety issues. The environment and social awareness training shall ensure that personnel is familiar with the principles of this EMP, the environment and social aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures. The project manager shall ensure a register of completed training is maintained.

The site induction should include, but not limited to the following:

- A general site-specific induction that outlines:
 - o What is meant by “environment” and the EMP?
 - o Why the environment needs to be protected and conserved
 - o How exploration activities can impact on the environment
 - o What can be done to mitigate against impacts?
- The inductee's role and responsibilities concerning implementing the EMP
- The sites environmental rules
- Details of how to deal with, and who to contact should any environmental problems occur
- Basic vegetation clearing principals and species ID sheets
- The potential consequences of non-compliance with this EMP and relevant statutory requirements, and
- The role of responsible people for the project.

4 INCIDENT REPORTING

The proponent must have an accident and incident reporting system that covers all applicable statutory requirements. The section below sets out the minimum requirements for incident reporting and should be used as a basis for incident reporting, in the event that no incident reporting system exists.

4.1 MINOR INCIDENT OR “NEAR MISS”

Any incident or “near miss” involving the proponent, a nominated representative, any contractor, or its subcontractors or any third party’s personnel, property, plant or equipment, must be

- 1) Orally reported to the General Manager or the General Managers nominated Representative:
 - a. immediately and without delay
 - b. regardless of whether or not injury to personnel has occurred
 - c. or property or equipment has been damaged.

- 2) Written up and handed to the General Manager or the General Managers nominated Representative by the end of the shift. The written report should:
 - a. state all known facts and conditions at the time of the incident and
 - b. includes a preliminary assessment of the most likely potential consequences of the incident under the current circumstances.

4.2 SERIOUS INCIDENT

For any serious incident involving a fatality, or permanent disability, the incident scene must be left untouched until witnessed by a representative of the Police. This requirement does not preclude immediate first aid being administered and the location being made safe.

4.3 INCIDENT REPORT AND CLOSE OUT

The General Manager must investigate the cause of all work accidents and significant incidents and must provide the results of the investigation and recommendations on how to prevent a recurrence of such incidents. A formal root-cause investigation process should be followed.

5 COMPLIANCE AND ENFORCEMENT

5.1 ENVIRONMENTAL INSPECTIONS & COMPLIANCE MONITORING

Inspections and audits of the site will be managed and undertaken by the exploration manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. All equipment will be inspected to ensure they are operating as per specification; no damage has been caused, and no leaks or spills have occurred. Any non-conformance shall be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action is taken and any necessary follow up measures required.

5.2 COMPLIANCE TO THE NATIONAL PARK

EPL 6155 is located in the /Ai-/Ais-Richtersveld Transfrontier Park (ARTFP) therefore, the National Policy on the Prospecting and Mining in Protected Areas provides direction in terms of where mining and exploration related impacts are legally prohibited and where biodiversity priority areas may present high risks for mining projects. In addition, the ARTFP Management Plan provides guidance and requirements for these activities in the Park.

Requirements under the Policy and Management Plan are as follows:

- The proponent shall provide the National Park staff and the MET with an environmental report every six months during exploration works, showing its progress towards meeting agreed-upon safeguard targets.
- The proponent shall communicate with the National Park staff regularly to ensure that mutual expectations are clear and reinforced, including:
 - o One month before undertaking the activities
 - o Once during each scheduled program of works (anticipated to be for three months a year for seven years)
 - o Once a month prior to activities completing
 - o Within one month of all site, rehabilitation works.
- The proponent shall allow Park staff and the MET to regularly visit and talk to the operators during exploration activities. The MET and Ministry of Mines and Energy (MME) may conduct inspections at any time during the year to monitor compliance with the Environmental Contract, EIA, EMP and/or any other conditions that are stipulated. Where non-compliance is observed, Park staff must immediately report the matter to the Chief Control Warden to enable "in house" remediation. If this fails, the matter must be reported to MET headquarters for higher-level attention.
- An annual environmental audit must be carried out on any EPL within any Protected Area. This audit must be conducted by the MET or MME, or an independent expert may be commissioned, at the licensee's cost, to conduct the audit, and
- Once prospecting has ceased, any impacts shall be rehabilitated as per the conditions stipulated in licence for EPL 6155. Conditions to operate in protected areas are set out in Annex 6 of the Policy are included in TABLE 4.

TABLE 4 - CONDITIONS TO OPERATE IN PROTECTED AREAS

General Conditions:

1. A list of company personnel, including ID/Passport numbers, nationality, and position, authorized to enter or work on the company's tenements within a PA, must be supplied to the MET officer in charge of the area.
2. Employee and personnel lists must be updated regularly (when any changes happen).
3. An annual permit must be obtained from the MET to enter a PA. All permanent staff must be listed on this permit. This permit must be shown each time a staff member enters the park, and all people in a group must correspond with the permit list. A separate permit must be obtained from the MET for non-permanent employees (contractors, service providers, etc.) to cover the duration of their visit.
4. A copy of all permits and permissions from the relevant authorities or ministries to carry out any of the proposed activities on the EPL must be supplied to the officer in charge of the area.
5. All employees must have an ID/name tag with their name, photo and job or function with an authorizing signature.
6. A suitable communication system to enable regular contact with PA officials must be installed.

Environmental Conditions:

1. A six-monthly progress report and environmental management report must be submitted to the MET starting from the date of commencement of operations.
2. All provisions of the Nature Conservation Ordinance, Ordinance 4 of 1975 and all amendments to this ordinance and Regulations Relating to Nature Conservation, GN 240 of 1976, with all amendments or any legislation that replaces it must be complied with.
3. All provisions of the Environmental Management Act, Act 7 of 2007, must be complied with.
4. Provisions of any other legislation pertaining to any aspect of the environment must be complied with.
5. Strict compliance with all conditions in the Environmental Contract and appendices.
6. No movement outside of the EPL area except when in transit between the entrance to the PA and the EPL area will be allowed. Such transit will be on a specified route.
7. A detailed site inspection will be carried out in conjunction with MET staff prior to commencement of any prospecting activities to establish access routes to target areas.
8. No motor bike, 3-wheeler or quad bike of any nature will be allowed to be used in an EPL for any purpose.
9. No hunting, catching or wilfully disturbing any animal is allowed.
10. No boating will be allowed on any river or water body unless it is within the operations detailed on the operational documentation.
11. No gathering of firewood or driftwood for any purpose will be allowed.
12. No pets of any description will be allowed.
13. No firearms, bows, crossbows, catapults or other weapons. Weapons for security purposes must be motivated and registered with the officer in charge of the area.
14. Traveling will be confined to an agreed-upon track network. New tracks will be kept to a minimum.
15. All waste must be removed from the license area to a waste disposal unit. No waste to be disposed of within the PA. A suitable scavenger and wind proof storage facility must be constructed to store waste material prior to transportation out of the area. Waste may be burnt on site and the ash and non-burn-able residue must be removed as described above. Attention must be given to wind conditions and all necessary measures must be taken to prevent wind distribution of rubbish. All fuel and lubricant waste products must be disposed of at a suitable facility outside of the PA.
16. Suitable and effective traps or pans must be used at vehicle or machinery refueling points. Soil contaminated with fuel or oil must be immediately dug up and stored in a safe place for later removal to a suitable disposal facility.
17. Under no circumstances may any waste material of any nature be disposed of in any water body or river.
18. All structures are to be temporary.
19. Toilets of a 'long drop' or pit latrine type must be put up immediately. The use of chemical toilets will not be acceptable, as there is the problem of disposing of the chemical residue. Any toilet must be constructed away from any river to prevent contamination.
20. Harvesting of reeds or other natural materials for construction or other purposes will not be allowed.
21. Transgressions of any provisions of the Nature Conservation Ordinance or its amendments will be dealt with severely. Second-time offenders will be asked to leave the park.

5.3 COMPLIANCE TO ENVIRONMENTAL PERMITS

Some vegetation shall be cleared on the EPL sites to allow exploration activities to commence. It is unlikely that an area greater than 15ha shall be cleared, therefore a permit, in terms of the Forest Act, 2001 is not required.

5.4 WATER PERMITS AND LICENCE

The Water Act (1956) governs the use of water resources in Namibia and is the enforceable piece of legislation for water related matters. The Water Resources Management Act (2013), passed but pending regulations (not enforced) provides an improved framework for managing water resources based on the principles of integrated water resource management, while not enforced it is considered best practice to adhere to the stipulations while ensuring compliance to the Water Act of 1956 is also maintained

Water will be sourced from a river and therefore a controlled requiring a permit; the permit for the use of the water will be in place prior to operations.

5.5 WASTEWATER DISCHARGE PERMIT

In the event that the operations produce waste water a permit must be obtained. In order to obtain an effluent wastewater, permit the proponent should have the following information and complete the application form contained in Appendix A:

- Specification of the treatment system (type of technology)
- Description of major activities resulting in effluent generation
- List of contaminants (analysis of effluent samples)
- Effluent quality
- Points of discharge
- Show the present average quantities of incoming water, recycled water, final outflow, and
- Where final effluent discharged.

5.6 REPORTING

Reports shall be submitted to the Mining Commissioner in terms of the Minerals (Mining and Prospecting) Act, 1992. The proponent is required to report quarterly, and a report shall be submitted 60 days after the currency of the EPL.

5.7 NON-COMPLIANCE

Where it has been identified that works are not compliant with this EMP, the project manager shall employ corrective actions so that the works return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice shall be produced. The notice shall be generated during the inspections and the project manager shall be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event / situation is considered if, for example:

- There is evidence of a contravention of this EMP and associated indicators or objectives
- The Site Manager and/or Contractor have failed to comply with corrective or other instructions issued by the Environmental Manager or qualified authority, or
- The site manager and/or contractor fail to respond to complaints from the public.

Works shall be stopped in the event of a non-compliance until corrective action(s) has been completed

5.8 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to):

- Fines / penalties
- Legal action
- Monetary penalties imposed by the proponent on the contractor
- Withdrawal of license/s, and
- Suspension of work.

The disciplinary action shall be determined according to the nature and extent of the transgression / non-compliance, and penalties are to be weighed against the severity of the incident.

6 SURFACE AND GROUNDWATER MANAGEMENT PLAN

6.1 INTRODUCTION

Chemical and waste spills must be contained so as not to contaminate the soil or groundwater. Any contact with groundwater must be treated with exceptional care and reported immediately, so as to minimize the potential for contamination of an aquifer. It is important to limit the potential for wastewater seepage to groundwater.

This Surface and Groundwater Management Plan outlines appropriate surface and groundwater water management measures, monitoring programs and reporting procedures to be implemented.

6.2 OBJECTIVES

This Surface and Groundwater Management Plan has been prepared to minimise potential impacts on surface and groundwater resulting from the exploration activities on EPL 6155. It is important to report any contact with or contamination of groundwater to the environmental coordinator or site manager as soon as possible.

6.3 RESPONSIBILITIES

WORKFORCE AND ALL CONTRACTORS

Required to take all reasonable measures to prevent the discharge of sediments and pollutants from the site in to surface and groundwater sources. Report any contact with groundwater to the environmental coordinator.

ENVIRONMENTAL COORDINATOR

Will ensure that the objectives listed above are being met and provide performance feedback to the general manager.

6.4 SURFACE AND GROUNDWATER MANAGEMENT MEASURES

The Surface and Groundwater Management measures are designed to minimise the runoff of sediment-laden or polluted water/ effluent into the surrounding environment. exploration activities that could potentially alter natural surface water and groundwater quality include:

- Chemical spills
- Refuelling
- Seepage of wastewater into groundwater
- Trenching and pitting
- Poor resource stewardship practices.

The following requirements are to be met to ensure that groundwater is not contaminated:

- Fuel/Oil and chemicals must be safely stored and removed.
- Any contact with surface or groundwater must be treated with exceptional care and reported immediately, so as to minimize the potential for contamination of an aquifer.
- Water used for gravel separation will be diverted away from the river, will not be discharged into the river.

TABLE 5 - WATER QUALITY MITIGATION MEASURES

Aspect	Mitigation Measure	Responsibility
--------	--------------------	----------------

Pollution control measures.	Visual monitoring and photographic record of any surface and/or groundwater intersected	Environmental coordinator
	Visual monitoring during rainfall events for runoff of polluted water	Environmental coordinator
	Vehicles and machinery are to be regularly serviced to minimise oil and fuel leaks.	Site manager
	Good housekeeping shall be maintained and chemicals, and fuel must be stored securely to prevent any accidental spills on the EPL site	Site manager
Sewage	Portable chemical toilet facilities will be hired for onsite use and any sewerage generated will be managed by the supplier/contactor.	Environmental coordinator and site manager

6.5 SURFACE AND GROUNDWATER QUALITY MONITORING PROGRAMME

Every effort must be made throughout to preserve the quality of surface water sources that the proponent may impact. Containment of waste and chemicals and the correct disposal thereof must be of an acceptable standard. Personnel must report any unusual conditions and intersection with surface and groundwater immediately to the environmental coordinator. A photographic record should be kept for future comparison. Water used for washing the gravel during exploration is less likely to impact the quality of water from the Orange River, as the water is diverted away from the river.

7 WASTE MANAGEMENT PLAN

7.1 INTRODUCTION

The exploration activities on EPL 6155 will generate both solid and liquid waste. The potential types of waste generated at the facility are typical for domestic home operations. All waste will be disposed of at the registered waste disposal unit in Rosh Pinah.

7.2 OBJECTIVES

This Waste Management Plan has been prepared to ensure the proper storage, transport, treatment and disposal of waste and where possible will follow the waste hierarchy, which encourages waste avoidance and waste reduction followed by reuse, recycling and reclamation, before waste treatment and waste disposal.

7.3 ROLES AND RESPONSIBILITIES

WORKFORCE AND ALL CONTRACTORS

- Required to ensure that all waste generated during exploration activities is removed and disposed of accordingly including providing evidence in the form of waste transfer receipts for the waste moved off site.
- Ensure no windblown rubbish pollutes the environment, and
- Remove waste on a regular basis to prevent vermin.

SITE MANAGER AND ENVIRONMENTAL COORDINATOR

- Required to inspect receipts and evidence of correct waste handling.
- Review waste management practices regularly during exploration on the EPL 6155 site.

7.4 SOLID WASTE

The facility has a recycling system in place whereby reducing its impacts associated with solid waste generation. Where possible the proponent will implement measures to reduce, reuse and recycle waste generated as part of the operations of the facility.

Waste will be controlled through prevention and mitigation measures as follows:

- Reduce, reuse and recycle where possible
- Storage of domestic waste on site may result in the attraction of unwanted scavengers and should be disposed of at the accredited site as soon as is feasible, and
- Hydrocarbon and chemical contaminated solids have the potential to cause contamination to the soil, ground and/or surface water, thus correct storage and disposal methods are required.

TABLE 6 - WASTE MITIGATION MEASURES

Aspect	Mitigation Measure	Responsibility
Environmental Contamination from liquid waste	Hydrocarbon and chemical contaminated solids must be storage correctly and disposed of by registered companies.	Site manager and environmental coordinator
	Safe disposal certificates must be kept and provided to the Project manager on request.	Environmental coordinator
Littering and Environmental Contamination from waste	No littering by workers shall be allowed.	Proponent
	All litter on and around the EPL site must be picked up and placed in the bins provided.	All staff
	The site should be kept tidy and free of litter at all times. All domestic and general waste produced on a daily basis should be cleaned and contained daily.	All staff
	No solid waste landfill will be established at the site.	Proponent
	No waste shall be burned or buried anywhere unless when advised to do so by the local Municipality.	Proponent
	<ul style="list-style-type: none"> - No persons shall enter the game park or nature reserve with a plastic bag unless; <ul style="list-style-type: none"> o Designated to be used for the disposal of waste; o Designated for agricultural purposes; o Used for sampling or analysis; o That constitutes or form an integral part of, the packaging in which goods are sealed prior to sale in the local market or for export; or That it is a transparent resealable bag	All staff

7.5 WASTE DISPOSAL MONITORING

Certificates providing the safe disposal of waste from a permitted waste disposal site must be provided to the Manager upon request.

8 SPILL MANAGEMENT PLAN

8.1 INTRODUCTION

The uncontrolled release of fuels and other chemicals has the potential to result in the contamination of soil, groundwater and surface water, which may lead to serious environmental harm. On this basis, the storage and use of fuels or other chemicals must be managed to minimise the risk of a release, and measures must be in place to promptly address impacts should a release occur.

8.2 OBJECTIVES

This Spill Management Plan has been prepared to minimise the potential for the uncontrolled release of fuels, oils and other chemicals. Preventative measures to minimise the potential for a spill are listed. Should a spill occur, this plan provides guidance for the proponent on the appropriate spill response measures.

8.3 ROLES AND RESPONSIBILITIES

WORKFORCE AND ALL CONTRACTORS

Required to implement the spill prevention and response measures listed below.

SITE MANAGER/ ENVIRONMENTAL COORDINATOR

Required to ensure that appropriately implemented spill prevention measures listed below and that any spills have been appropriately managed and reported.

8.4 SPILL PREVENTION MEASURES

The following management measures are to be implemented by the Proponent:

- Spill kits are to be made available throughout the site. The kits are to include, as a minimum, the following items:
 - o Absorbent materials
 - o Shovels
 - o Heavy-duty plastic bags
 - o Protective clothing (e.g. gloves and overalls), and
 - o Major servicing of equipment shall be undertaken offsite or in appropriately equipped workshops
- Provision of adequate and frequent training on spill management, spill response and refuelling must be provided to all onsite staff
- Fuels, lubricants and chemicals are to be stored within appropriately sized, impermeable bunds or trays with a capacity not less than 110% of the total volume of products stored
- All fuel and chemical storage and handling equipment (including transfer hoses, etc.) shall be well maintained
- Storage and handling of fuels and chemicals shall be in compliance with relevant legislation and regulations

- No refuelling is to take place within 50 metres of groundwater boreholes, surface water or streams, and
- Material Safety Data Sheets are to be kept for each chemical used on site. These must be easily accessible to all personnel.

8.5 SPILL RESPONSE MEASURES

The primary concern, in the event of any spill, is the health and safety of any residents and contractors in the vicinity. Of secondary, but highly significant, importance, is the protection of water sources and then soil and vegetation.

The following points therefore apply to all areas on the site:

- Assess the situation for potential hazards.
- Do not come into contact with the spilled substance until it has been characterised and necessary personal protective equipment (PPE) is provided.
- Isolate the area as required.
- Notify the site manager or safety, health and environmental coordinator.
-

The following measures are to be implemented in response to a spill:

- Spills are to be stopped at source as soon as possible (e.g. close valve or upright drum)
- Spilt material is to be contained to the smallest area possible using a combination of absorbent material, earthen bunds or other containment methods
- Spilt material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be necessary to excavate the underlying soils until clean soils are encountered
- All contaminated materials recovered subsequent to a spill, including soils, absorbent pads and sawdust, are to be disposed to appropriately licensed facilities
- The manager or safety, health and environmental coordinator are to be informed as soon as possible in the event of a spill, and
- A written Incident Report must be submitted to the general manager.

TABLE 7 - SPILL MITIGATION MEASURES

ASPECT	MITIGATION MEASURE	RESPONSIBILITY
Stored Hazardous Chemicals	Hazardous chemicals are to be stored in bunded areas	Site manager
	Hazardous chemicals (such as fuels) are to be handled over areas provided with impervious surfaces	Site manager
	Spills of hazardous chemicals are to be contained and cleaned-up to ensure protection of the environment	All
	All the necessary PPE required for the safe handling and use of petrochemicals and oils shall be provided to, and used or worn by, the onsite staff	All
Machinery and Equipment Maintenance	Major servicing of equipment shall be undertaken offsite or in appropriately equipped workshops	Site manager
	For small repairs and required maintenance activities all reasonable precautions to avoid oil and fuel spills must be taken	Site manager

	(e.g. spill trays, impervious sheets).	
	Vehicles and machinery are to be regularly serviced to minimise oil and fuel leaks	Site manager
	All the necessary PPE required for maintenance activities must be issued to staff whose duty it is to manage and maintain the machinery and equipment.	Site manager/ environmental Coordinator

8.6 SPILL REPORTING

All major petroleum product spills should be reported to the Ministry of Mines and Energy (MME) on Form PP/11 titled 'Reporting of major petroleum product spill' attached as Appendix B.

9 AIR QUALITY MANAGEMENT PLAN

9.1 INTRODUCTION

Particulate and gaseous emissions from vehicle exhausts, wind erosion and other activities associated with the project have the potential to affect amenity, safety, human health and the environment.

This Air Quality Management Plan describes the strategies and procedures that will be implemented to ensure that the health and amenity of construction workers and nearby sensitive receptors are protected from elevated concentrations of airborne dust and other gaseous emissions. In cases where generators and other machinery are used, there will be some release of exhaust fumes that will impact the immediate vicinity but will be of short duration.

9.2 OBJECTIVES

The main objective of the Air Quality Management Plan is to ensure that emissions from operational activities are controlled to an acceptable level and do not significantly impact adjoining properties such as the neighbouring communities, farms or other sensitive receptors.

- As far as reasonably practical, activities should not generate visible dust.
- Machinery should not emit excessive exhaust fumes.

9.3 RESPONSIBILITIES

WORKFORCE AND ALL CONTRACTORS

To implement the necessary management practices in order to meet the objectives listed above.

SITE MANAGER/ ENVIRONMENTAL COORDINATOR

To ensure that the objectives listed above are being met and to provide performance feedback to the general manager.

9.4 AIR QUALITY MANAGEMENT PROCEDURES

Activities that may potentially emit dust during the operations include the following:

- Vehicle movements
- Machinery operations

The proponent will minimise the potential for dust generation by undertaking the following management measures, as required:

- Vehicle movements will be restricted to sealed roads.
- Appropriate speed limits will be set and enforced.
- Ground disturbance will be minimised as far as practical.
- Vehicles and machinery will be maintained so as to limit exhaust fume emissions.

TABLE 8 - AIR QUALITY MITIGATION MEASURES

ASPECT	MITIGATION MEASURE	RESPONSIBILITY
Dust and fumes	Vehicles must adhere to speed limits so as to avoid producing excessive dust.	Site manager and contractor
	Vehicles and machinery are to be regularly serviced according to the manufacturers' specifications and kept in good working order so as to minimise exhaust emissions.	Site manager and contractor

9.5 AIR QUALITY MONITORING PROGRAMME

Visual monitoring of exploration activities can ensure the minimum discharge of airborne dust and other emissions according to the Air Quality Management Plan.

9.6 NOISE IMPACTS

There sensitive receptors within proximity to the site are the tourists. Activities on the EPL 6155 have the potential to generate nuisance noise that can impact the quality of life for neighbouring residents and tourism activities with the park however this potential impact Are minimal due to the nature of the exploration methods employed.

Notwithstanding the above point, the proponent should continue to ensure potential noise sources are mitigated through measures such as:

- Avoid noise generating activities at night
- Avoid noise generating activities that could impact other users of the park area by ensuring noisy activities are avoided especially at night, ensure appropriate measures are put in place to rectify noise compliant should they occur.
- Scheduling of works to avoid disturbance between the hours of 7 am pm and 5 pm, and
- Procedures for receiving complaints from nearby land users or residents to be in place and mitigation measures to be implemented should construction generate excessive noise, which is unexpected.

Occupational noise is managed through the health and safety management plan and therefore not applicable to this EMP.

10 IMPLEMENTATION OF THE EMP

This Environmental Management Plan (EMP):

- A. Has been prepared according to a contract with the proponent
- B. Has been prepared based on information provided to ECC up to July 2019
- C. Is for the sole use of the proponent, for the sole purpose of an EMP
- D. Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP, and
- E. Must not be copied without the prior written permission of ECC.

APPENDIX A: APPLICATION FOR A WASTEWATER DISCHARGE LICENCE



DEPARTMENT OF WATER AFFAIRS & FORESTRY

FAX: (061) 208 7160 PRIVATE BAG 13184
TEL: (061) 208 7111 WINDHOEK
REFERENCE NO: NAMIBIA

APPLICATION FOR A WASTEWATER DISCHARGE LICENCE, IN TERMS OF PART XIV OF THE WATER RESOURCES MANAGEMENT ACT, 2004

(Act No. 24 of 2004 - as published in the Government Gazette of the Republic of Namibia, No. 3357, of 23 December 2004, Government Notice No. 284)

A. GENERAL INSTRUCTIONS

1. Applications must be submitted in duplicate to:

The Permanent Secretary
Attn.: Law Administration
Ministry of Agriculture, Water and Forestry
Private Bag 13184
WINDHOEK

2. Application Fee (to accompany this document): N\$ _____

3. The various sections have to be completed as follows:

Section B & C - All applicants
Section D - Complete only the part relevant to technology employed in your works.
Section E - All applicants (compulsory!)

4. Only the relevant Sections that have been filled in need to be submitted with this application.

5. A separate application needs to be filled in for each different plant/works.

NAME OF TREATMENT PLANT/WORKS: _____

PLACE: _____ **GPS Coordinates:** _____
(e.g. town, settlement)

B. GENERAL INFORMATION

1. Name of applicant: _____

2. Address - Contact Person: _____

- Postal: _____

- Physical: _____

- Tel No.: _____

- Fax No.: _____

- E-mail: _____

3. Region in which plant is situated: _____

4. Constituency in which plant falls: _____

5. Type of establishment:
(e.g. school, town, industry) _____

6. Source of water supply:
(e.g. borehole, river, sea) _____

7. Total water consumption: _____ m³/day ADWF*

(*ADWF = Average Dry Weather Flow) _____ m³/day ADWF*

• Consumption based on the average usage over a 12-month period. _____ m³/day ADWF*

• List different sources separately _____ m³/day ADWF*

8. Application:

• Prepared by: Name : _____ Position: _____

(e.g. Consultant) Signature: _____ Date: _____

• Responsible Executive: Name : _____ Position: _____

Signature: _____ Date: _____

C. TECHNICAL DETAILS - GENERAL

Answers to the following information must be contained in this application either from the questionnaire or as an attachment thereto (see also details in Appendix A):

NAME OF TREATMENT PLANT/WORKS: _____

1. Type of effluent (please also refer to Section D for classifications): _____

2. Site of works:

2.1 Submit a site plan indicating the exact location (or intended location) of the works. This plan should indicate (as a minimum):

- 2.1.1 General location of the works with regards to settlements, main roads, boreholes, rivers etc.
- 2.1.2 Layout plan of property showing all existing and proposed water pipes and effluent and drainage lines in distinctive colours.
- 2.1.3 Topographical plan/area photograph/contour plans showing the property and effluent treatment plant in relation to residential areas, rivers, pans, dams, lakes and boreholes.
- 2.1.4 Contour plans indicating the exact location of the effluent treatment works and point of discharge of final effluent in relation to watercourses that drain the area.
- 2.1.5 Give the following information:
 - 2.1.5.1 Distance to nearest inhabitants: _____m
 - 2.1.5.2 Distance to nearest water abstraction point (e.g. river, borehole): _____m
 - 2.1.5.3 Distance to nearest watercourse (e.g. dry river) and specify: _____m
 - 2.1.5.4 Wind direction (main/normal) _____

2.2 Submit overall details of works:

- 2.2.1 Type of effluent treatment system and a brief description of its method of operation. (If domestic effluents are dealt with by the local authority please enclose a letter from the authority confirming this agreement).
- 2.2.2 Flow diagram/mass balances to show the present average quantities of incoming water, recycled water, final outflow, seepage and evaporation losses (all in m³/day).
- 2.2.3 Layout orientation drawing indicating all major treatment units and fence around works.
- 2.2.4 Complete flow diagram and key design parameters to include:
 - 2.2.4.1 Dimensions and design capacities of each unit process;
 - 2.2.4.2 Process Flow Diagram(s) and major instrumentation employed, e.g. water meters;
 - 2.2.4.3 Loadings on the system (e.g. hydraulic, COD, BOD, nitrogen, phosphate);
- 2.2.5 Indicate allowances that have been made for future expansion and increased loads (if any).
- 2.2.6 Methods of sludge disposal or recirculation.
- 2.2.7 Disinfection of the final effluent (indicate dosing type, method, retention period and optimum disinfectant level in final effluent).

3. Monitoring boreholes for monitoring groundwater pollution over time must be available within 500 m of the point of final effluent discharge.

4. Please note: Additional information is required for new treatment plants (e.g. an environmental impact assessment) - details can be obtained from the Department of Water Affairs and Forestry.

5. All relevant information must be included with this application. **It is a criminal offence to deliberately withhold vital information relevant to this application.** Where applicants are found to be in contravention with this requirement, they may/will be prosecuted.

D. TECHNICAL DETAILS - SPECIFIC

Applicants should only complete sections relevant to their specific effluent (please tick relevant box):

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

D-1: Domestic Effluent - Includes wastewater collected in towns (excluding industrial effluent!), villages, schools, lodges, administration buildings.

D-2: Industrial Effluent - Includes wastewater generated by any industry, factory, etc.

D-3: Mining Effluent - Includes wastewater accumulated or collected due to mining operations (e.g. Acid mine wastewater)

D-4: Combination/mix of various effluents (list major effluent streams on page 11)

Final Effluent Reuse

The pressure on Namibia's existing fresh-water supplies can, to a great extent, be eased by the sensible reuse of effluents for a variety of purposes including dust control, agriculture and industrial processes. Therefore, reuse of effluent after suitable treatment is encouraged.

The allowable reuse of an effluent is dependent upon its quality as well as many local circumstances and hence each application in this category needs careful and individual scrutiny, which should be undertaken by a specialist in this field and must be supported by an environmental impact assessment study.

A separate licence for effluent reuse is required and more details in this regards can be obtained from the Department of Water Affairs and Forestry.

D-2. INDUSTRIAL EFFLUENTS

Plant Name:

2.1	Describe industry and major activities resulting in effluent generation		
2.2	Capacity / Flowrates :		
	Design - Average daily flow		m ³ /d
	- Peak hourly flow		m ³ /h
	Actual (if in operation) - Average daily flow		m ³ /d
	- Peak hourly flow		m ³ /h
	If ponds are employed, state total surface area		m ²
2.3	List only major contaminants (also attach full analysis of typical effluent sample)		
2.4	Type of treatment employed (give short overview of process):		
2.5	List major treatment chemicals* employed in the unit process(es):		
2.6	Final effluent quality after treatment (put envisaged final quality for a new plant):		
2.7	Sludge generation:		
	- Volume generated		m ³ /d
	- Mass		kg/d (dry solid)
	- Method of disposal		
	- Place of disposal		
	- Major constituents		
	- If sludge ponds, state frequency of cleaning		
2.8	Do you employ cleaner production principles (CPP)? Yes/No		
	If "yes", elaborate:		
2.9	Is the following documentation included (give reason if not)?		
	▪ Water (and waste) management plan:		Yes/No
	▪ Decommissioning plan:		Yes/No

* For the chemicals employed, proper mass balances should be included that show chemical usage, movement and discharge within the factory/process(es). All safety aspects related to handling, storage and disposal of chemicals on site must be followed at all times.

D-4. COMBINATION OF VARIOUS EFFLUENTS

Plant Name:

4.1	Describe major activities resulting in effluent generation (e.g. type of industry):				
4.2	Capacity / Flowrates of different streams (major only)	1	2	3	
	Type (e.g. domestic, industrial, mining, others)				
	Design - Average daily flow				m ³ /d
	- Peak hourly flow				m ³ /h
	Actual (if in operation) - Average daily flow				m ³ /d
	- Peak hourly flow				m ³ /h
4.3	List only major contaminants (also attach full analysis of typical effluent sample)				
4.4	Type of treatment employed (give short overview of process)				
4.5	List major treatment chemicals employed in the unit process(es):				
4.6	Final effluent quality after treatment (put envisaged final quality for a new plant)				
4.7	Sludge generation:				
	- Volume generated				m ³ /d
	- Mass				kg/d (dry solid)
	- Method of disposal				
	- Place of disposal				
	- Major constituents				
	- If sludge ponds, state frequency of cleaning				

E. FINAL EFFLUENT DISPOSAL

1.4.1	Where is the final effluent discharged to? (E.g. French drain, pumped out by Local Authority, dry river course, perennial river, etc.)	
1.4.2	IF soakaway, state:	
	<ul style="list-style-type: none"> - Type of soil - Suitability/porosity of soil - Size of soakaway area - Include topography and plan of soakaway area 	
1.4.3	Is there any post-treatment applied? (e.g. disinfection, filtration)	
1.4.4	Is the final effluent re-used? (Yes/No)	
	If "Yes", complete:	
	- Do you have a reuse licence?	
	- Amount of water that will be re-used:	m ³ /d
	- For what application:	
	- Type of irrigation used (if applicable):	
	- What crops are grown:	
1.4.5	- Area of land that will be irrigated:	
	ha	
1.4.6	Name (if any) downstream users (downstream of discharge point).	
1.4.6	Past records of complaints or objections by people living close to works:	

Reuse:

A reuse licence is required – details can be obtained from the Department of Water Affairs and Forestry.

Irrigation:

The crops allowed to be irrigated are dependent upon effluent quality (details will be supplied on request by the Department of Water Affairs and Forestry).

