



Submitted to: Three Musketeers Investment (Pty) Ltd
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REPORT:

AMENDMENT TO THE !URIS ENVIRONMENTAL CLEARANCE CERTIFICATE FOR SMALL-SCALE QUARRYING ACTIVITIES, OSHIKOTO REGION, NAMIBIA

PROJECT NUMBER: ECC-80-456-REP-02-D

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Client Company Name: Three Musketeers Investment (Pty) Ltd

Client Name: Mr Andre Neethling

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Authors: Environmental Compliance Consultancy

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ABBREVIATIONS

ABBREVIATION	DESCRIPTION
°C	Celsius degrees
CIA	cumulative impact assessment
DEA	Directorate of Environmental Affairs
DPMT	Dundee Precious Metals Tsumeb
ECC	Environmental Compliance Consultancy
ECC	environmental clearance certificate
EIA	environmental impact assessment
EMP	environmental management plan
ESIA	environmental and social impact assessment
ha	hectares
IFC	International Finance Corporation
km	kilometres
Ltd.	Limited
m	metre
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
mm	millimetre
Mt	metric tonnes
No	Number
PO Box	Post office box
Pty	proprietary
Reg	registration

1 INTRODUCTION

1.1 COMPANY BACKGROUND

Environmental Compliance Consultancy Pty Ltd (ECC) has been contracted by Three Musketeers Investment (Pty) Ltd, the Proponent, for the application to amend the existing environmental clearance certificate - Ref. No. ECC-2200063 (Appendix B).

The project is located on farm !Uris 481, located approximately 20 km north-west of Tsumeb, in the Oshikoto Region, Namibia (Figure 1). The proponent intends to operate quarrying activities, within a site that is located on their farm within the granted mining claim 73963.

The proposed project amendment intends to collect silica gravel to be delivered to the Dundee Precious Metals Tsumeb (DPMT) smelter. The site area will be 17.6 ha and will operate for an intended period of 10 years.

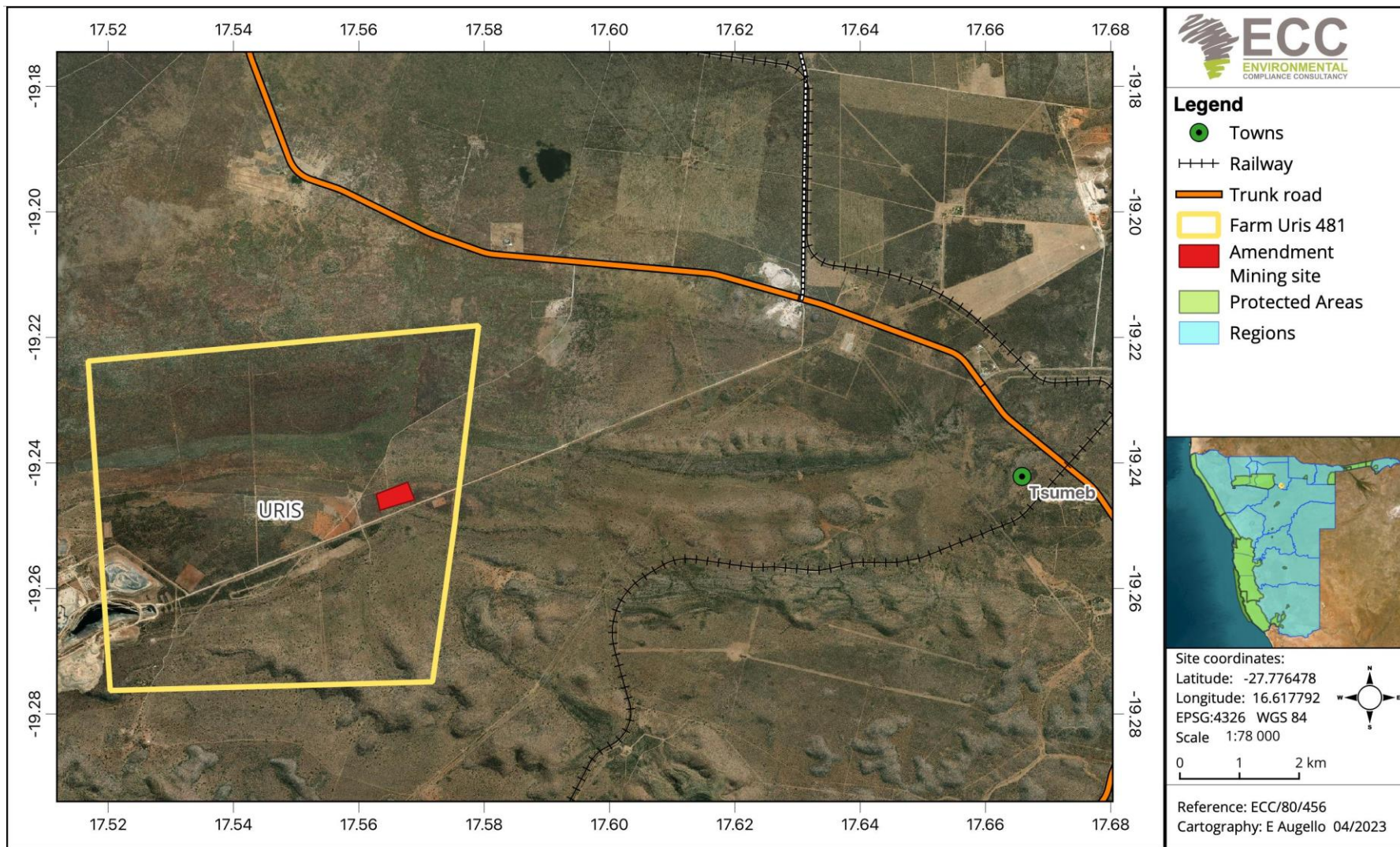


Figure 1 – Quarry area within farm !Uris 481, Oshikoto Region, Namibia

1.2 PURPOSE OF THE AMENDMENT REPORT

This is an amendment report to assess the proposed additional activity on farm !Uris for quarrying. This amendment report appends to the completed environmental and social impact assessment (ESIA) that was conducted in compliance with the Namibian Environmental Management Act, 2007 and its regulations.

1.3 THE PROPONENT OF THE PROPOSED PROJECT

Three Musketeers Investment (Pty) Ltd. is the Proponent for the amendment, a Namibian registered company (Reg. No. 2000/612). The Proponents' details are provided in Table 1.

Table 1 - Proponent's details

Company Representative:	Contact Details:
Mr Andre Neethling	Three Musketeers Investment (Pty) Ltd.: PO Box 1182, Tsumeb baasco@afol.com.na +264 (81) 122 8502

1.4 ENVIRONMENTAL AND SOCIAL ASSESSMENT PRACTITIONER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed. All compliance and regulatory requirements regarding this report should be forwarded by email or posted to the following address:

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1.5 ENVIRONMENTAL REQUIREMENTS

The Environmental Management Act, 2007, and its regulations stipulate that an environmental clearance certificate is required before undertaking any of the listed activities that are identified in the Act and its regulations. The existing environmental clearance has been approved under the following listed activities (Table 2).

Table 2 – Listed activities approved by the existing environmental clearance

LISTED ACTIVITY:	ESIA SCREENING FINDINGS:
<p>ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES (1) The construction of facilities for - (a) the generation of electricity; (b) the transmission and supply of electricity;</p>	<p>Power will be generated on-site by a diesel generator</p>
<p>WATER RESOURCE DEVELOPMENT (8.1) The abstraction of ground or surface water for industrial or commercial purposes.</p>	<p>Due to the drilling of exploration boreholes, ground and surface water will need to be abstracted, or sourced. All the required permits shall be obtained from the Ministry of Agriculture, Water and Land Reform.</p>

The amendment to the existing environmental clearance certificate will trigger the following additional listed activities (Table 3).

Table 3 – Listed activities triggered by the amendment

LISTED ACTIVITY:	ESIA SCREENING FINDINGS:
<p>Mining and Quarrying Activities (3.2) Other forms of mining or extraction of any natural resources whether regulated by law or not (3.3) Resource extraction, manipulation, conservation and related activities</p>	<p>The extraction of loose gravel will be used to provide gravel to the nearby Dundee Precious Metals Tsumeb (DPMT) smelter. The quarrying activities are estimated to be 3,000 Mt per month, including the fines</p>
<p>Forestry Activities (4.) The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.</p>	<p>The area interested by the project is heavily encroached and will need to be cleared to grant the operations of the project. The total area to be cleared is equivalent to 17.6 ha Relevant forestry permits would be obtained for land clearing.</p>

2 PROJECT DESCRIPTION

2.1 QUARRYING ACTIVITIES

The proponent intends to operate quarrying activities, within a site that is located on farm !Uris their farm within the granted mining claim 73963. The proposed project amendment on the existing environmental clearance certificate intends to operate in a 17,6 ha to collect silica gravel to be delivered to the Dundee Precious Metals Tsumeb (DPMT) smelter.

2.2 PROPOSED AMENDMENT

Farm !Uris 481 is the holder of an existing environmental clearance certificate (ECC 2200063) to undertake the irrigation project to produce plants and fresh produce using the excess clean wastewater from Tschudi Copper Mine, situated nearby. The suggested amendment will include quarrying operations to mine loose silica gravel within the farm boundaries

2.3 OPERATIONS

The intended duration of the activities is envisaged for ten years, using bulldozers and loaders as machinery used to extract the material. The loose silica gravel mined will be stockpiled on site and loaded on tipper trucks which will operate two to three trips per day on proclaimed farm and national roads to the DPTM smelter. The envisioned quantities per month are 1,500 Mt per month (after crushing and screening), while the amount to be loaded, including the fines, might be up to 3,000 Mt per month.

2.4 SUMMARY OF THE SITE AND SURROUNDING ENVIRONMENT

Table 4 gives a brief description of the sites and environment surrounding the project.

Table 4 – Summary of the environment surrounding the project

Summary of the local environment	
Climate	Maximum temperatures average around 32 - 34°C, while minimum temperatures are around 6 - 8°C. This area receives an average of 500 mm rainfall per year (Mendelsohn, et al 2002).
Geology	Farm !Uris is situated within the Damara Supergroup and Gariep Complex. The rock type of the area consists of limestones and dolomites.(Bubenzer, 2002)
Topography and soil	The topography of farm !Uris consists of a plain with extruding hills, where the height above sea level varies between 1,286 and 1,418 m. These soils are both formed by organic sedimentary cambisols (soil at the beginning of its formation with very weak horizon

Summary of the local environment	
	differentiation) and leptosols (shallow over a rocky substrate or deeper soil but extremely gravelly) (Bubenzer, 2002)
Hydrogeology and hydrology	Farm !Uris is situated in the Etosha catchment area (Bubenzer, 2002)
Vegetation	The vegetation type in the surroundings of farm !Uris is the Karstveld savanna with Colophospermum mopane and Terminalia pruinoides as dominant species. Plant diversity is between 400 and 500 species and plant endemism is between six and fifteen species (Mendelsohn et al., 2002).
Fauna Species	Overall terrestrial biodiversity in the area of the project, ranges from medium to high with medium to high lizard diversity (28 to 31 species), high birds' diversity (up to 230 species) and high mammal diversity (up to 90 species) (Bubenzer, 2002)
Socio-economic baseline	Farm !Uris is located in a rural area, where the predominant land use is agriculture and livestock farming, with guest and hunting farms in between (Bubenzer, 2002)

2.5 DECOMMISSIONING

The lifespan of the quarry is dependent on the quantities of the rock deposit, the technology used to mine and the financial sustainability of the business. Other circumstances that may warrant decommissioning include withdrawal or expiry of licenses issued by government agencies, closure by government agencies, court orders and natural calamities. According to the Proponent, however, the envisioned duration of the project is 10 years.

In case of decommissioning the area will need to undergo a specific rehabilitation project that the proponent will prepare and submit to the competent authorities. The impact of this phase is summarised in Table 5.

Table 5 – Summary of the impacts in case of decommissioning of the proposed project

Impacts	Mitigation measures
At this phase, the destruction of various fauna and flora at the site is evident. Quarrying activities also have a direct impact on the land by leaving pits and heaps of waste material. Excavations will tamper with the soil structure exposing the site to possible landslides and soil erosion.	Construct contour banks to protect disturbed areas from erosion prior to stabilization Rip along the contoured slopes and immediate re-vegetation to increase slope stability Promote re-vegetation through the encouragement of the natural process of secondary succession

Impacts	Mitigation measures
Additionally, the terrain of the site would be against the topography of the area	

3 ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

3.1 PURPOSE OF THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

The ESIA process in Namibia is governed and controlled by the Environmental Management Act, No. 7 of 2007 and the ESIA Regulations No. 30 of 2012, which is administered by the Office of the Environmental Commissioner through the Directorate of Environmental Affairs (DoA) of the MEFT.

An ESIA is a process of identifying, predicting, evaluating and mitigating the potential effects of a proposed project on the natural and socioeconomic environment. The aims of the ESIA process and subsequent report are to apply the principles of environmental management to proposed activities; reduce the negative and increase the positive effects arising from a proposed project; provide an opportunity for the public to consider the environmental impacts of a proposed project through meaningful consultation; and to provide a vehicle to present the findings of the assessment process to competent authorities for decision making.

3.2 ENVIRONMENTAL REQUIREMENTS

The Environmental Management Act, 2007, and its regulations stipulate that an environmental clearance certificate is required before undertaking any of the listed activities that are identified in the Act and its regulations. The existing environmental clearance has been approved under the following listed activities (Table 6).

Table 6 – Listed activities triggered by the current project

Listed activity:	ESIA screening findings:
<p>Energy generation, transmission and storage activities (1) The construction of facilities for - (a) the generation of electricity; (b) the transmission and supply of electricity;</p>	<p>Power will be generated on-site by a diesel generator</p>
<p>Water resource development (8.1) The abstraction of ground or surface water for industrial or commercial purposes.</p>	<p>Due to the drilling of exploration boreholes, ground and surface water will need to be abstracted, or sourced. All the required permits shall be obtained from the Ministry of Agriculture, Water and Land Reform (MAWLR).</p>

The amendment to the existing environmental clearance certificate will trigger the following new listed activities in addition to those already presented in Table 7.

Table 7 – Listed activities triggered by the amendment

Listed activity:	ESIA screening findings:
<p>Mining and Quarrying Activities (3.2) Other forms of mining or extraction of any natural resources whether regulated by law or not (3.3) Resource extraction, manipulation, conservation and related activities</p>	<p>The extraction of loose gravel will be used to provide gravel to the nearby Dundee Precious Metals Tsumeb (DPMT) smelter. The quarrying activities are estimated to be 3,000 Mt per month, including the fines</p>
<p>Forestry Activities (4.) The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.</p>	<p>The area interested by the project is heavily encroached and will need to be cleared to grant the operations of the project. The total area to be cleared is equivalent to 17.6 ha Relevant forestry permits would be obtained for land clearing.</p>

3.3 ASSESSMENT METHODOLOGY

3.3.1 Introduction and guidance

Prediction and evaluation of impacts is a key step in the ESIA process. The aims of this assessment will be to determine which impacts are likely to be significant; to scope the available data and identify any gaps that need to be filled; to determine the spatial and temporal scope; and to identify the assessment methodology. The scope of the assessment was determined through undertaking a preliminary assessment of the proposed Project against the receiving environment, and was obtained through a desktop review, available site-specific literature and information provided by the Proponent.

The following principal documents were used to inform the assessment method:

- Namibian Draft Procedures and Guidance for EIA and EMP (Republic of Namibia, 2008) and best practice;
- International Finance Corporation (IFC) standards and models, in particular performance standard 1: 'Assessment and management of environmental and social risks and impacts (International Finance Corporation, 2021) for the social environment; and

- International Finance Corporation Cumulative Impact Assessment (CIA) and Management Good Practice Handbook (International Finance Corporation, 2013) for the social environment and overall cumulative impacts, where applicable.

3.3.2 Limitations, uncertainties and assumptions

The following limitations and uncertainties associated with the assessment methodology will be considered in the assessment phase:

- Topic-specific assessment guidance has not been developed in Namibia. A generic assessment methodology will be applied to all topics using IFC guidance and professional judgement.
- Guidance for the CIA has not been developed in Namibia, but a single accepted state of global practice has been established. The IFC's guidance document (International Finance Corporation, 2013) will be used for the CIA.

3.3.3 Assessment methodology

The ESIA methodology applied to this assessment has been developed by ECC using the International Finance Corporation (IFC) standards and models, in particular performance standard 1: 'Assessment and management of environmental and social risks and impacts' (International Finance Corporation, 2017); Namibian Draft Procedures and Guidance for EIA and EMP (Republic of Namibia, 2008); international and national best practice; and over 25 years of combined ESIA experience. The methodology is set out in Figure 2 and Figure 3.

The evaluation and identification of the environmental and social impacts require the assessment of the Project characteristics against the baseline characteristics, ensuring that all potentially significant impacts are identified and assessed. The significance of an impact is determined by taking into consideration the combination of the sensitivity and importance/value of environmental and social receptors that may be affected by the proposed Project, the nature and characteristics of the impact, and the magnitude of any potential change. The magnitude of change (the impact) is the identifiable changes to the existing environment that may be negligible, low, minor, moderate, high, or very high; temporary/short-term, long-term or permanent; and either beneficial or adverse.

ECC IMPACT PREDICTION AND EVALUATION METHODOLOGY

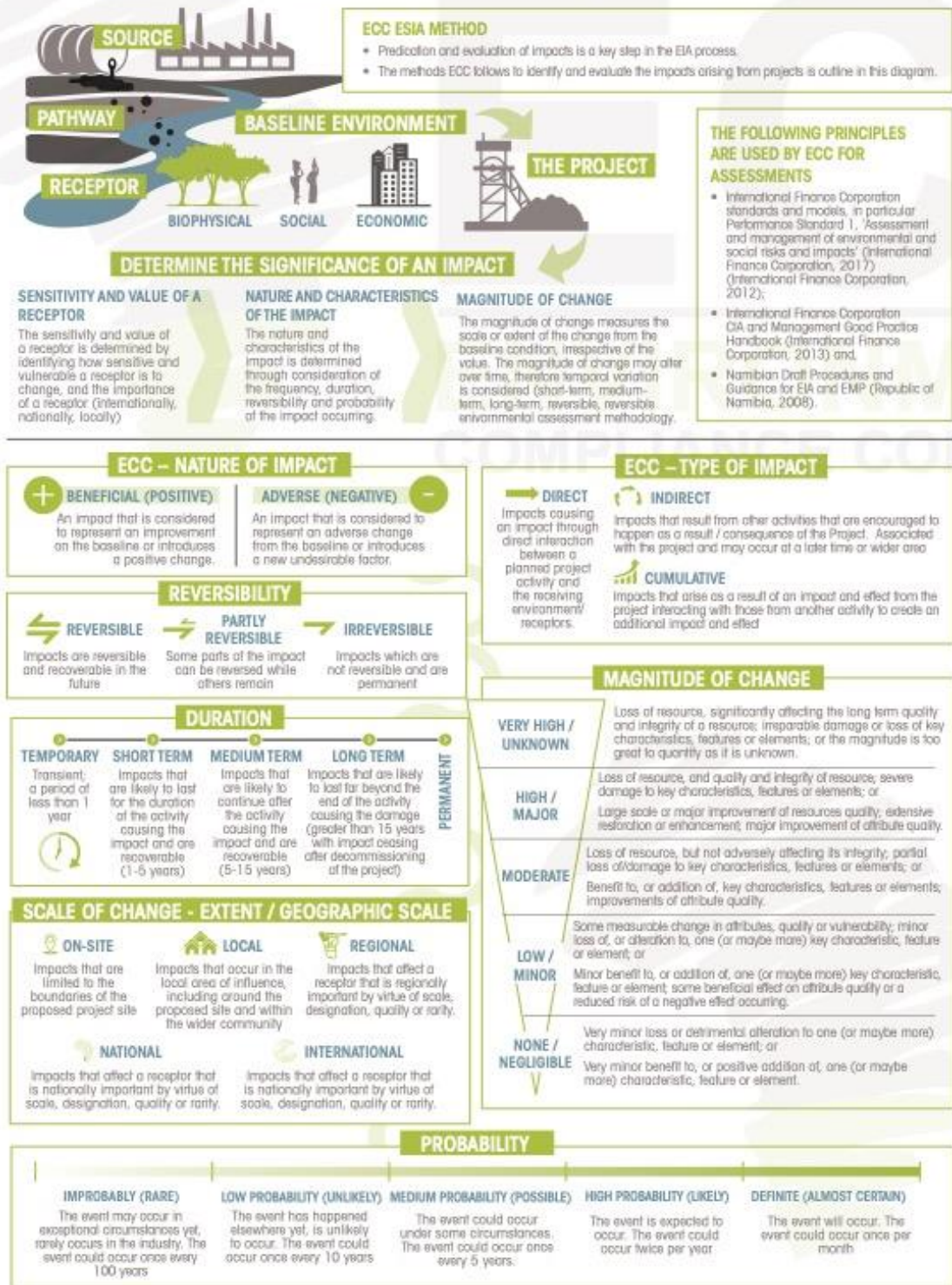
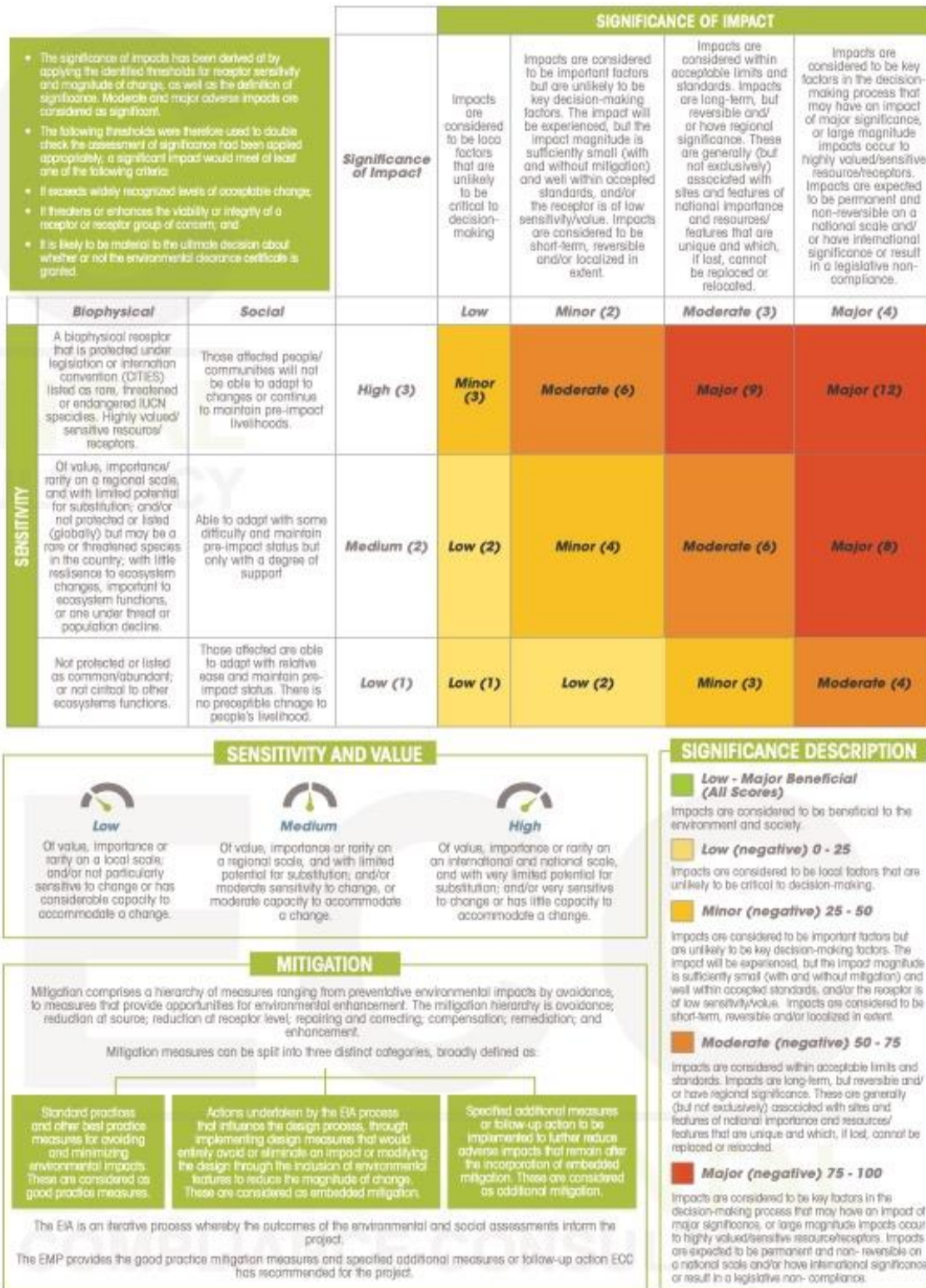


Figure 2 – ECC ESIA methodology based on IFC standards



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Figure 3 – ECC ESIA methodology based on IFC standards

3.3.4 Mitigation

Mitigation comprises a hierarchy of measures ranging from preventative environmental impacts by avoidance, to measures that provide opportunities for environmental enhancement. The mitigation hierarchy is avoidance; reduction at source; reduction at receptor level; repairing and correcting; compensation; remediation; and enhancement.

Mitigation measures can be split into three distinct categories, broadly defined:

1. Actions undertaken by the ESIA process that influence the design process, through implementing design measures that would entirely avoid or eliminate an impact, or modifying the design through the inclusion of environmental features to reduce the magnitude of change. These are considered embedded mitigation.
2. Standard practices and other best practice measures for avoiding and minimising environmental impacts. These are considered good practice measures.
3. Specified additional measures or follow-up action to be implemented, in order to further reduce adverse impacts that remain after the incorporation of embedded mitigation. These are considered additional mitigation.
4. The ESIA is an iterative process whereby the outcomes of the environmental assessments inform the Project.

The EMP (Appendix A) provides the good practice measures and specified additional measures or follow-up action.

Embedded mitigation and good practice mitigation will be taken into account in the assessment. Additional mitigation measures will be identified when the significance of the impact requires it and causes the impact to be further reduced. Where additional mitigation is identified, a final assessment of the significance of impacts (residual impacts) will be carried out, taking into consideration the additional mitigation.

3.4 ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT FINDINGS

When undertaking the scoping exercise, the design of the proposed project amendments and best practice measures associated with these changes were considered to ensure the likely significant effects and any required additional mitigation measures were identified. The following topics were considered during the scoping phase:

- Waste
- Use of Explosives
- Visual
- Disturbance in terms of tourism
- Noise and Vibration

- Power supply
- Site preparation (clearing from bush vegetation, earthworks and site-associated infrastructure)
- Quarrying operations (excavation, stockpiling and transportation of product)
- Socioeconomic (employment, local businesses, community, land use)
- Air quality (including dust)
- Cultural heritage resources (namely historical cemetery)
- Cumulative impacts

The sections below describe the findings of the assessment phase.

3.4.1 Environmental

Quarrying operations will require the clearance of 17.6 ha from all vegetation. This will have an effect on local flora, which will be completely eradicated, and fauna, due to the drastic change in the site habitat. The clearing of the area will have an effect on the increased potential for erosion during the rainy season. Moreover, the extraction of loose silica gravel will generate vibrations and dust production as well as a visual impact on topography and landscape.

However, due to the spatial restriction of the site where the project will operate, impacts will result in mitigation measures that will be limited, therefore, the impacts on the environment are considered adverse minor.

3.4.2 Socioeconomic

3.4.2.1 *Employment*

Due to the scale and nature of the project, where mechanised equipment will be used in a very small area, the number of employees will likely be between 9 and 14 local workers. Therefore, quarrying activities will have a beneficial impact on the local community, with the creation of jobs for an estimated duration of 10 years. The sensitivity of the receptor, the community, and the magnitude of change is low. Livelihoods will benefit for the period of construction and the community will be able to cope once the quarrying activities have ceased. The significance of the impact is determined as a beneficial low.

3.4.2.2 *Local business – purchasing of goods and services*

The product of the quarrying activities will be entirely sold to the DPMT smelter in Tsumeb, with the result of having a limited beneficial socioeconomic impact on local businesses and communities. The sensitivity of the receptor and the magnitude of change is low. Livelihoods

will benefit for the period of construction and the community will be able to cope once the construction activities have ceased. The significance of the impact is determined as a beneficial low.

3.4.3 Non-significant impact topics

Amongst all the topics considered during the scoping phase, some have been found of non-significant environmental impact, summarised in Table 8.

Table 8 – Potential project impact having a non-significant environmental effect

Environmental and Social Topic	Potential Impact	Rational
Environmental Potential Impact		
Waste	Human effluent wastewater generation, collection, transport and disposal	This is considered insignificant due to the low number of employees <10 people and the proponent will have a chemical toilet installed, cleaned and changed regularly by a contractor therefore no discharge, no septic or French drains on site and therefore limited potential impacts.
Use of explosives	Handling of hazardous substances including explosives	No explosives will be used on site therefore no impact associated with this.
Social Potential Impact		
Visual	Loss of sense of place	The project site will be located about 30 km from Tsumeb and will be out of view from the town and its inhabitants
Disturbance in terms of tourism	Land is no longer used for tourism facilities	Within the farm there was a Lodge but it is no longer operational, therefore the project will no longer be affecting tourism operations
Noise and vibration	Production of noise and vibration from quarrying operations	The project site will be located about 30 km from Tsumeb and will be out of view from the town and its inhabitants
Power Supply	Need of electricity for operations	This project will be operating during the daytime, therefore no need for electricity inputs to illuminate the site during nighttime. Moreover, the equipment (excavators, trucks, etc.) will not use electricity

Environmental and Social Topic	Potential Impact	Rational
Cultural Heritage Resources	Damage to heritage sites	The operational site does not include any heritage resources therefore, this impact will not be further assessed
Economical Potential Impact		
Loss of employment		During the eventual closing of operations and subsequent decommissioning, the low number of employees (<10) will have a low impact on employment and livelihoods
Cumulative impacts		
Noise, dust (air quality) and the human environment (traffic and transport)	The cumulative impact could affect the environment and cause disturbance to people living nearby	These impacts will remain the same as assessed and scored in the sections above. Therefore, the significance of the cumulative impacts is determined as low to minor.

3.4.4 Topics with significant impact

Due to the nature of the operations of the proposed amendment, it is unavoidable to incur some activities with significant environmental impact. However, the size area is so restricted that the impacts are generally at an on-site scale, therefore the impacts are limited to the interested site. During the scoping phase, they have been identified and are summarised in Table 9.

Table 9 – Topics of the project with significant environmental impact

Activity	Receptor/s	Impact	Nature of impact	Value & sensitivity	Magnitude of change	Significance of impact
Site clearing from vegetation	Flora	Complete clearing of the area can create noise pollution that chases away localised	Adverse On-site Short term Partly reversible	Low	High/Major	Adverse Minor (4)

Activity	Receptor/s	Impact	Nature of impact	Value & sensitivity	Magnitude of change	Significance of impact
		fauna. Increase in the potential for soil erosion and visual change in topography and landscape				
Quarrying operations	Air quality Visual	Air quality might be affected due to the production of dust. Operations will generate a ground hole with high visual impact	Adverse On-site Long term Irreversible	Low	High/Major	Adverse Minor (4)
Noise and Vibration production	Local fauna	Operations will affect local fauna	Adverse On-Site Short-term Reversible	Low	None/negligible	Adverse Minor (3)

3.5 ENVIRONMENTAL MANAGEMENT PLAN

The EMP for the amended portions of the proposed Project is presented in Appendix A. It provides management options to ensure the impacts of the proposed amendments to the Project are minimised. An EMP is a tool used to take proactive action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary.

The management measures should be adhered to during the various phases of the quarrying activities. All personnel taking part in the operations of the proposed Project should be made aware of the contents of the EMP, so as to plan the operations accordingly and in an environmentally sound manner.

The objectives of the EMP are:

- To include all components of the development and operations of the Project;
- To prescribe the best practicable control methods to lessen the environmental impacts associated with the Project;
- To monitor and audit the performance of operational personnel in applying such controls; and
- To ensure that the appropriate environmental training is provided to responsible operational personnel

CONCLUSIONS AND RECOMMENDATIONS

After evaluating and assessing the listed aspects and potential impacts in section 3.4, it was determined that all adverse impact sensitivity is of low to minor significance. Moreover, a beneficial low socioeconomic impact was noted for local businesses due to the limited size of the operations. It was assessed that the potential impact on the cultural heritage resources is null.

Through analysis and identification of mitigation and management methods, the assessment concludes that the likelihood of significant environmental impact due to these amendments is low. Various best practices and mitigation measures have been identified to avoid and reduce effects as far as reasonably practicable, as well to as ensure the environment is protected and unforeseen effects are avoided.

On this basis, it is the opinion of ECC that a revised environmental clearance certificate could be issued, on condition that the management and mitigation measures specified in the amended environmental management plan (Appendix A) are implemented and adhered to.

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APPENDIX A – ENVIRONMENTAL MANAGEMENT PLAN

APPENDIX B – ENVIRONMENTAL CLEARANCE CERTIFICATE



Submitted to: Three Musketeers
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REPORT:

EMP FOR THE IRRIGATION PROJECT AND QUARRYING ACTIVITIES ON FARM !URIS IN THE OSHIKOTO REGION, NAMIBIA

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Project Name:	EMP for the irrigation project and quarrying activities on Farm !Uris in The Oshikoto Region, Namibia
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Client Name:	Mr Andre Neethling
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Authors:	Environmental Compliance Consultancy
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ABBREVIATIONS

Abbreviation	Description
DPMT	Dundee Precious Metals Tsumeb
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy
EMA	Environmental Management Act
EMP	environmental management plan
GPS	Global Positioning System
ha	hectares
I&APs	interested and affected parties
ID	identification
IECO	independent environmental control officer
IFC	International Finance Corporation
Ltd.	Limited
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
MSDS	material safety data sheets
PM	project manager
PPE	personnel protective equipment
Pty	proprietary

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (ECC) has been contracted by Three Musketeers Investments (Pty) Ltd, the proponent, to compile an environmental management plan (EMP) in accordance with the Environmental Management Act, No. 7 of 2007. The purpose of this EMP is to include the quarrying activities on Farm !Uris, adjacent to the Tschudi Copper Mine, Tsumeb.

In 2022, Three Musketeers Investment (Pty) Ltd was granted an environmental clearance certificate for the irrigation project to produce plants and fresh produce on Farm !Uris, using excess clean wastewater from Tschudi Copper Mine. An amendment was made in May 2022 whereby only $\frac{3}{4}$ of the intended site (500 ha) was necessary of the irrigation project. In 2023 the proponent requested the inclusion of quarrying activities, within a site that is located on Farm !Uris in the granted mining claim 73963. The quarrying activities include the collection of silica gravel which will be delivered to Dundee Precious Metals Tsumeb (DPMT) smelter. The site area will be 17.6 ha and will operate for an intended period of 10 years.

The proposed project is located on Farm !Uris, approximately 20 km north-west of Tsumeb, Oshikoto Region, Namibia (Figure 1).

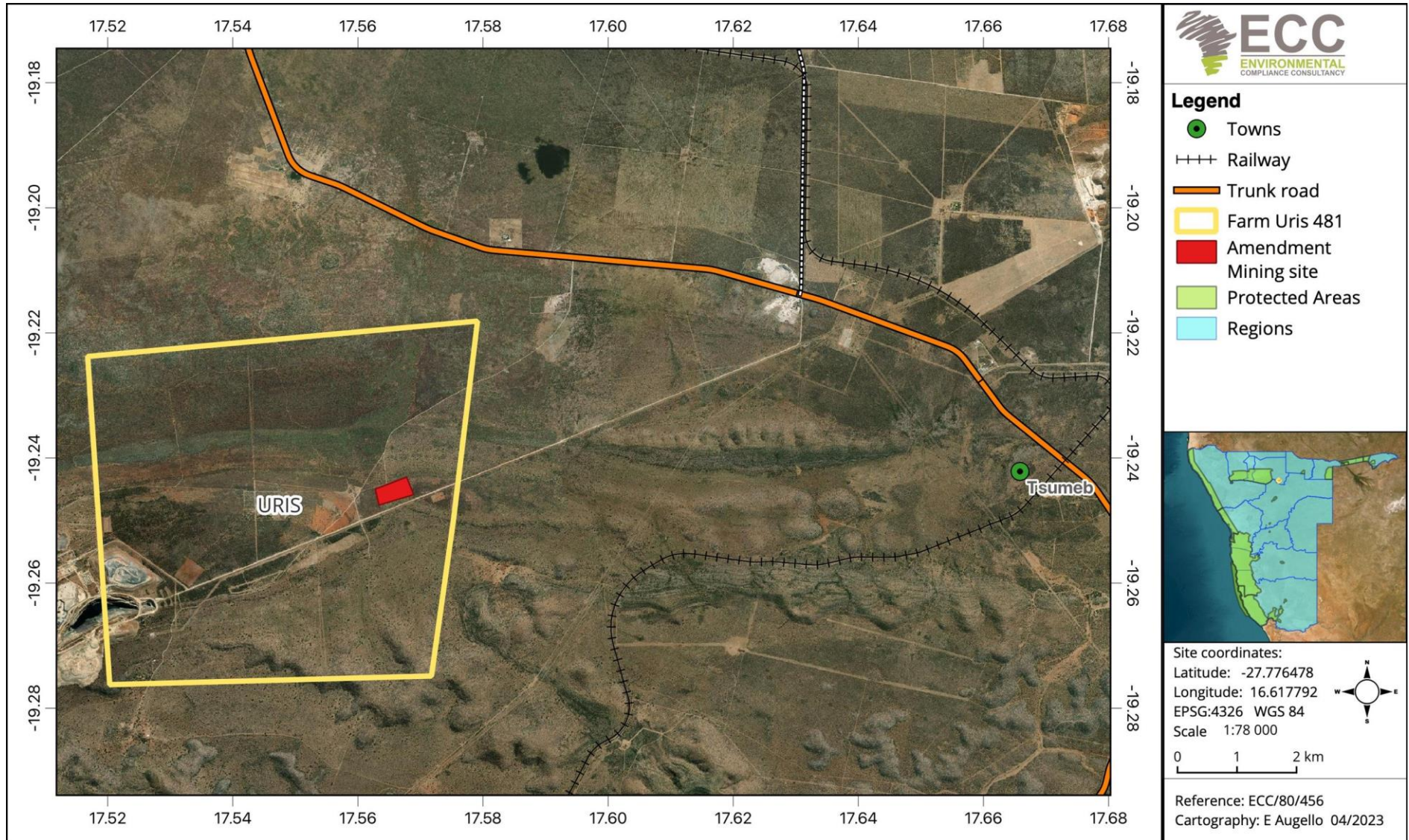


Figure 1 - Quarry area within Farm !Uris 481, Oshikoto Region, Namibia

1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

In terms of the Environmental Impact Assessment (EIA) Regulations and the Environmental Management Act, No. 7 of 2007, the proposed project qualifies as a listed activity. Therefore, an application for an environmental clearance certificate is to be submitted. An environmental scoping report and 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 act and its regulations.

1.3 PURPOSE AND SCOPE OF THIS REPORT

The purpose of this EMP is to provide a management framework for the proposed activities on Farm !Uris so that the potential environmental impacts are avoided, minimised and mitigated as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled.

This EMP also presents protocols, procedures, roles and responsibilities to ensure the management arrangements are appropriately and effectively implemented. This EMP forms an appendix to the environmental scoping report and has been 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 will be reviewed at predetermined intervals, and or updated when the scope of works alters, or when further data / information can be 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 the irrigation project and quarrying activities carried out on Farm !Uris.

1.4 MANAGEMENT OF THIS EMP

The proponent, Three Musketeers Investment (Pty) Ltd will hold the environmental clearance certificate for the proposed project and will be responsible for the implementation and management of this EMP. Prior to the quarrying 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 will be undertaken through daily duties and activities and monthly inspections.

This EMP will be circulated to all contractors and made available on ECC's website.

1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THE EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirements. This will be provided in the health and 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 to be undertaken. This EMP does not address full scale mining and should full scale mining be required a detailed assessment and EMP for such would be required.

1.6 ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy (ECC) (Reg. No. CC 2022/0593) has prepared this EMP on behalf of the Proponent.

This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the Proponent and has no vested or financial interest in the Project, except for fair remuneration for professional fees rendered which are based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of Mertens Mining and Trading. No member or employee of ECC has, or has had, any shareholding in Mining and Trading.

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

Environmental Compliance Consultancy
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Tel: +264 81 669 7608
Email: info@eccenvironmental.com

2 PROJECT MANAGEMENT PERSONNEL

- This EMP provides measures, guidelines, and procedures for managing and mitigating potential environmental impacts. The EMP also indicates monitoring and reporting requirements and sets responsibilities for those carrying out management and mitigation measures. Three Musketeers Investments (Pty) Ltd will provide a project team to oversee activities and responsibilities.

2.1 ORGANISATION STRUCTURE, ROLES, AND RESPONSIBILITIES

- The proponent will 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 fulfil this requirement, and
 - Ensuring that any person allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood;
 - Contractors will be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed in Table 1.

Table 1- Key roles and responsibilities

Role	Responsibility and duties
Proponent/Farm Owners	<ul style="list-style-type: none"> - Overall responsibility for the implementation and management of this EMP - Ensure the environmental policy is communicated to all personnel throughout the proposed project and ensure that employees, contractors and visitors understand and adhere to the EMP - Responsible for providing the required resources (including financial and technical) to complete the required tasks
Project Manager (PM)	<p>The owners of the individual farm portions will be responsible for ensuring compliance with this EMP, including overseeing the construction works, day to day activities during operations and routine and non-routine maintenance works during operations, as well as the decommissioning of the development:</p> <ul style="list-style-type: none"> - Ensuring all personnel are aware of the commitments made in this EMP and any relevant regulatory requirements applicable to the Project; - Responsible for the management, maintenance and revisions of this EMP, ensuring adequate resources are made available for implementation of this EMP;

Role	Responsibility and duties
	<ul style="list-style-type: none"> - Maintain up to date register of employees who have complete the site induction; and - Provisioning of environmental awareness/management training and inductions for all employees; - Ensuring the best environmental practice is undertaken throughout the duration of the Project; - Report any non-compliance or accidents to the Regulatory Authority.
Site Manager/Contractors	<p>Appointed to manage the performance of the construction and operational maintenance activities. Responsible for the implementation of this EMP and ensuring all activities are compliant with this EMP, as well as:</p> <ul style="list-style-type: none"> - Managing the preparation and implementation of method statements for certain activities, ensuring the site manager reviews all method statements and the relevant environmental protocols are incorporated; - Reporting any non-compliance or accidents to the project manager; - Ensuring that all staff attend a site induction session before commencement of any work on-site and that they are adequately informed of the requirements of this EMP; - Ensuring that all contract workers, sub-contractors and visitors to the site are conversant with the requirements of this EMP, relevant to their roles on site and adhere to this EMP at all times; and - Receiving, responding to and recording complaints.
Employees (and contractors and visitors where applicable)	<ul style="list-style-type: none"> - Responsible for being compliant with this EMP throughout the project - Ensuring they have undertaken a site induction and are conversant with the requirements of this EMP; - Ensuring appropriate briefings for certain activities have been provided and are fully understood, and - Adherence to this EMP at all time; - Reporting any operations and conditions that deviate from the EMP or any non-compliant issues or accidents to the site manager and project manager.

2.2 EMPLOYMENT

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

- In liaison with the relevant authorities, the proponent will ensure that local people have access to information about job opportunities and are considered first for contract employment positions
- The number of job opportunities will be made known together with the associated skills and qualifications
- The maximum length of time the job is likely to last for will be clearly indicated
- Foreign workers with no proof of permanent legal residence will not be hired, and
- Every effort will be made to recruit from the pool of unemployed workers living in the local area.

3 COMMUNICATIONS AND TRAINING

3.1 INTRODUCTION

In order to ensure potential risks and impacts are minimised, it is vital that personnel are appropriately informed and trained on operational procedures that include the above mitigation measures. It is also important that regular communications are maintained with all the stakeholders 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.

3.2 COMMUNICATION

During the entire project, the project manager and or site manager (or nominated site supervisor) will communicate site-wide environmental issues to the project team through the following means (as and when required):

- Site induction
- Audits and site inspections
- Toolbox talks, including instruction on incident response procedures, and
- Briefings on key project-specific environmental issues.

This EMP will be distributed to the project team, including contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations will also be briefed to workers and contractors. During the entire project regular communications between the management team will 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.

3.3 ENVIRONMENTAL EMERGENCY AND RESPONSE

Table 2 contains a list of numbers to be contacted in case of an emergency. All personnel will be made aware of these numbers.

Table 2 - Emergency contact details

Town	Ambulance	Police	Fire brigade
Tsumeb	+264 (67) 22-1082	+264 (67) 1-0111	+264 (67) 22-1004

For large-scale spills (greater than 200 litres) and other significant environmental incidents, the fire services should be contacted as required and the MEFT office informed of the incident (telephone +264 61 284 2111) as well as the MME by completing form PP/11. All correspondence with MEFT/MME should be undertaken by the general manager as guided by the project manager.

3.4 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally or in writing by any personnel on the project site will 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 will 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 will inform employees of issues, concerns or complaints.

The project manager will maintain a complaint register that will detail the name and contact details of the complainant, date and time of the complaint, nature of the complaint, action is taken to resolve issues, and date of complaint handover. The project manager will be responsible for nominating the correct personnel to coordinate and resolve the issue.

The workforce will be informed about the complaints register, its location and the person responsible, to refer local residents or the general public who wish to lodge a complaint. The complainant will 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 are to be recorded in the register and reported to the complainant. The complaints register will be kept for the duration of the project and will be available for government or public review upon request.

3.5 TRAINING AND AWARENESS

- All personnel working on the project will 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.

3.6 SITE INDUCTION

- All personnel involved in the project, contractors and visitors will be inducted to the site with specific environmental and social awareness training, and health and safety issues. The environment and social awareness training will ensure that everybody onsite 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 will ensure a register of completed training is maintained.
- The site induction should include, but is not limited to the following:
 - A general site-specific induction that outlines:
 - What is meant by "environment" and "social"
 - Why the environment needs to be protected and conserved
 - How operational activities can impact on the environment, and
 - What can be done to mitigate against such impacts.
 - The inductee's role and responsibilities with respect to implementing the EMP

- The site environmental rules
- Details of how to deal with, and who to contact if environmental problems should occur
- Basic vegetation clearing principles and species identification sheets
- Focal themes such as compliance, contentious issues (e.g. stock theft, poaching), reporting of accidents and incidents, good housekeeping and standard procedures for waste management
- The potential consequences of non-compliance with this EMP and relevant statutory requirements, and
- The role of responsible people for the project.

4 REPORTING COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

4.1.1 DAILY INSPECTIONS

- A copy of this EMP will be on site throughout the duration of the project and will be available upon request. It is the responsibility of the project manager and site manager (or nominated site supervisor) to ensure this EMP is complied with through their daily roles. Daily, weekly and monthly inspections will be undertaken. Any environmental problems or risks identified will be notified to the project manager and actioned as soon as is reasonably practicable.

4.1.2 MONTHLY INSPECTIONS

- Monthly inspections will be undertaken by the site 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. Any non-conformance will 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.

4.2 REPORTING

There will be a requirement to ensure that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the project/general manager.

4.3 ENVIRONMENTAL PERMITS

4.3.1 ECOLOGY

Article 23 (b) of the Forest Act, 2001 and associated regulations states that the clearing of vegetation on an area of land greater than 15 hectares will require a permit. This will include the removal of any protected or important species. Permits shall be obtained whenever vegetation is cleared and the Proponent shall undertake all activities in line with the conditions stipulated in the permit.

4.3.2 WATER ABSTRACTION

Although the Water Resources Management Act, No. 11 of 2013 is not enforced, it is best practice to adhere to its stipulations while ensuring compliance with the Water Act, No. 54 of 1956, which is maintained still. Currently, the Proponent uses water from existing boreholes, but will also obtain water from the adjacent Tschudi Copper Mine (utilizing their excess water pumped from the mine pit in the dewatering process), once the mine is back in operation.

The Proponent will apply for a secondary licence to abstract water for commercial use as required in terms of the Water Act, No. 54 of 1956 and shall operate by following any conditions stipulated on the licence.

4.4 NON-COMPLIANCE

Where it has been identified that activities are not compliant with this EMP, the project manager will take corrective actions so that the activities 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 will be produced. The notice will be generated during the inspections and the project manager will be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

- A non-compliance event / situation, for example, is considered if:
- There is evidence of the contravention of this EMP and associated indicators or objectives
- The project manager and or site manager (or nominated supervisor) have failed to comply with corrective or other instructions issued by the project manager or qualified authority, or
- The project manager and /or site manager (or nominated supervisor) fail to respond to complaints from the public.
- Activities causing non-compliance will be stopped in the event of a non-compliance until corrective action(s) has been completed.

4.5 INCIDENT REPORTING

The project manager must ensure that an accident and incident (including minor or near-miss) reporting system is maintained so that all applicable statutory requirements are covered. 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.

The project 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.

4.6 DISCIPLINARY ACTION

- This EMP is a legally binding document and non-compliance with it will 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 will 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.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 OBJECTIVES AND TARGETS

- Environmental objectives for the project are as follows:
- Zero pollution incidents
- Minimal vegetation clearing
- Protect local flora and fauna
- Minimise the generation of waste, and
- Minimal interruption to farm activities

5.2 MANAGEMENT PLAN OF ENVIRONMENTAL IMPACTS

An environmental review of the proposed Project and associated quarrying activities has been completed to identify all the commitments and agreements made within the environmental scoping report.

Table 3 provides a management plan for potential environmental impacts, which identifies mitigation and monitoring measures, as well as the responsible person. This management plan will be subject to regular review by the manager and updated when necessary. The general manager will use this table to undertake monthly inspections to ensure the Project is compliant with this EMP.

Table 3 - Environmental aspects, impacts and mitigation measures

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
Job creation, skills development and business opportunities	Beneficial socio-economic impacts on a local and regional scale	<ul style="list-style-type: none"> – Maximise local employment and local business opportunities; – Enhance the use of local labour and local skills as far as reasonably possible; and – Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible. 	Monthly	General manager/Proponent
General construction, operational and quarrying activities	<ul style="list-style-type: none"> – Odours – Safety – Aerial emissions – Potential loss of oil and fuel causing ground contamination 	<ul style="list-style-type: none"> – Plant and equipment shall be brought onto the site as and when required and stored in specific areas; – Amenities (e.g. portable toilets) shall be provided and set up in a suitable location (if required); – A ‘good housekeeping’ policy shall be adopted across the farm portions especially with regards to surface infrastructure (sheds, buildings etc.); and – Refuelling of the mobile plant shall be undertaken in a designated area. 	Daily	Project manager
	Dust generation	<ul style="list-style-type: none"> – Use existing access roads and tracks; – Dust suppression using water may be necessary where the ground is to be left fallow during a dry period or where dust generation is profound; – Use of mixed crops, including trees to minimise wind-blown erosion. – Restricted speeds (<30 km/hr); and – Provide protective masks and eyeglasses to employees in dusty working environments. 	Daily	Project manager

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
	Noise and vibration generation	<p>Noise and vibration shall be minimised as much as possible during pipeline construction works and quarrying activities. The following measures shall be applied:</p> <ul style="list-style-type: none"> - Limit normal operating hours to 07h00 to 18h00 on weekdays and 07h00 until 13h00 on Saturday; - Regular maintenance and servicing of vehicles, plant and equipment; and - All equipment is to be shut down or throttled back between periods of use. 	Daily	Project manager
	Fire management	<ul style="list-style-type: none"> - Development of a fire management system through the process of risk identification and assessment; - Developing site-specific work procedures as part of the fire management system; - Induction on fire prevention and toolbox talks; - Control and reduce the potential risk of fire by segregating and safe storage of flammable materials; - Avoid potential sources of ignition for example, by prohibiting smoking in and around areas where chemicals/fuel is stored; - Ensure suitable fire-extinguishing equipment is accessed immediately and conveniently whenever necessary. This can include pails of water, buckets of sand, or portable extinguishers; - For field fires, appropriate firefighting equipment should be available on-site; 	Daily	Employees

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Emergency contact details should be readily available on-site; – Ensure key personnel are trained to manage an emergency fire situation. 		
	Topography and Landscape	<p>All borrow pits/quarries need to be rehabilitated as follows:</p> <ul style="list-style-type: none"> – Borrow pits may only be backfilled with clean or inert fill; No material of hazardous nature (e.g. sand removed with an oil spill) may be dumped as backfill; – Rehabilitated borrow pits need to match the contours of the existing landscape; – Take note of drainage channels in the vicinity of the borrow pit. The rehabilitation area should not be higher (or lower) than a drainage channel. This ensures the efficiency of revegetation and reduces the chances of potential erosion; – Topsoil is to be spread across borrow pit areas evenly; – Deep ripping is required, not just simple scarification, so as to enable rip lines to hold water after heavy rainfall; – Ripping should be done along contour lines, not up and down a slope, which could lead to enhanced erosion; – Rehabilitated borrow pits need to remain fenced-off after they have been decommissioned to prevent livestock from removing the newly established vegetation on the area. 	After decommissioning and closure of project	Project Manager

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
Vegetation	– Alien species	<ul style="list-style-type: none"> – Ensure the correct removal of alien invasive vegetation from the farm portions and prevent the establishment and spread of alien invasive plants due to the operational activities; – Ensure the potential introduction and spread of alien plants is prevented; and – All Project or earth moving equipment must have an internal weed and seed inspection completed prior to equipment being used on site. 	Monitor daily the removal of the alien invasive vegetation. Check the tyre of vehicles after use on-site.	Project manager
	<ul style="list-style-type: none"> – Removal of vegetation – Loss of flora and fauna, protected/important species – Dust generation 	<ul style="list-style-type: none"> – Use existing tracks where possible; – Identify and mark important tree species and clearly highlight them to construction workers so that they are avoided; – Apply speed restrictions; – Avoid off-road driving; – Access tracks should be wider than normal to accommodate equipment; and – Apply speed restrictions. 	Daily visual inspection during construction of new access tracks/widening	Employees
Biodiversity encounters	The possible encountering of wildlife on-site	<p>The Nature Conservation Ordinance Act No. 4 of 1975 and its regulations, Controlled Wildlife Products and Trade Act 9 of 2008 and the Animals Protection Act 71 of 1962 should be closely followed with regards to any encounters with wildlife within farm boundaries.</p> <ul style="list-style-type: none"> – No living organism should be removed from the site by anyone other than by a professional/registered animal 	Daily, weekly	Employees

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<p>handler, pest control company, SPCA, MEFT/MAWLR or relevant rehabilitation or wildlife organisations;</p> <ul style="list-style-type: none"> - No living organism shall be poached/consumed/harmed or killed for illegal purposes (i.e., illicit trade of pangolins for scales); - Police and MEFT should be notified of any poaching incident involving sensitive or protected species or if such an animal is found on someone within or surrounding farm boundary; - If snares or poaching equipment is found in the field it should be removed and destroyed; - Fences and farms should be monitored for potential snares and traps; - Wildlife encountered on farm should be ethically treated; - Nests discovered on infrastructure within farm boundaries should not be removed or destroyed if it is not clear that there are no eggs or chicks in the nests; - Nests/eggs/birds should be identified by a professional and action could be taken depending on advice or instruction given by the professional; - Pesticides and herbicides should not be used as far as reasonably possible; - If there is no other possibility the relevant pesticides/herbicides/chemicals should be used by a professional/registered pest control company and the MSDS of the substance used should be closely followed; 		

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Invasive plant species should be removed and their spread should be prevented; and - Waste on-site should be well managed and removed from the site to prevent animals (i.e. rodents, snakes, scorpions etc) from breeding/living on-site. 		
Biodiversity	Construction and installation of the pipeline infrastructure	<ul style="list-style-type: none"> - Holes excavated for the pipelines should be covered during the night or during periods of no construction. - Construction vehicles should not drive into the field; - Construction vehicles should be on the lookout for slow-moving animals to avoid killing or harming them; - Vehicles should stay on the existing roads as far as possible; and - Prevent the killing of perceived dangerous species (e.g., snakes); collection of veld foods (e.g., giant bullfrog, tortoise, monitor lizard); any form of poaching (e.g., setting of snares for birds and ungulates, etc.). 	Daily	Contractor/Project manager
Site and Ground Preparation	Potential soil disruption	<ul style="list-style-type: none"> - Specific activities that may generate dust shall be avoided during high wind events, e.g. soil preparation activities; and - Use of mixed crops, including trees to minimise wind-blown erosion. 	Daily	Project manager
Land management	Reduced soil quality (loss of nutrients, use of chemicals)	<ul style="list-style-type: none"> - Ensure land is suitably prepared before planting crops. This may involve the application of fertilisers; - Fertilisers to be applied by following material safety data sheet (MSDS) guidelines for safe application methods and prescribed limits; 	Daily	Project Manager

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Ensure land is suitably prepared before planting crops. - Plant crops suitable to the soil quality, climate and needs as per the Agriculture Study (Smith, 2015) - Apply fertilisers as required and by following legal and safety requirements; - Minimise use of pesticides and insecticides and implement sustainable integrated pest management through the use of physical, chemical, biological and cultural controls; - Minimise surface runoff during rainfall events through suitable ground management measures such as diversion channels around the field that must be able to deliver the runoff to a stable outlet; - Minimise surface runoff by using any readily available mulching materials e.g straw, grass clippings and wood chips (www.fao.org, n.d.); and - Avoid leaving bare earth for long durations and consider the use of shelterbelts or cover crops during high wind. 		
<p>Operating plant and equipment during pipeline construction phase</p>	<ul style="list-style-type: none"> - Dust generation - Increase in noise levels 	<ul style="list-style-type: none"> - Normal working hours should be restricted between 07:00-18:00 during the week and 07:00-13:00 on Saturdays. No construction work may be conducted on Sundays; - Regular maintenance of plant, equipment and machinery; - Spilled oil should be treated as hazardous waste; and - Drip trays for trucks to avoid oil leakages and to be used when refuelling. 	<p>Daily, weekly</p>	<p>Project Manager Employees (equipment operators)</p>

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
Harvesting activities	Potential re-establishment of alien plants on site	<ul style="list-style-type: none"> - Ensure the correct removal of alien invasive vegetation from the proposed Project area and prevent the establishment and spread of alien invasive plants; and - Ensure compliance with relevant environmental specifications for the control and removal of alien invasive plant species. 	Weekly	Project Manager
Resource use	Inefficient use of water	<ul style="list-style-type: none"> - Regularly manage crops, crop areas and irrigation systems to avoid applying water to unplanted areas or applying irrigation when not needed; - Using appropriate irrigation rates and scheduling; - Design the irrigation system for improved irrigation, uniformity and efficiency to reduce runoff and leaching; - Regularly maintain the irrigation system so that it continues to operate efficiently; and - The irrigation method will ensure that maximum water uptake through plant absorption is as effective as possible to ensure minimal water loss through inefficient irrigation processes. 	Check irrigation infrastructure weekly	Project Manager
Use of fertilisers and pesticides	<ul style="list-style-type: none"> - Ground contamination - Ecological effects 	<ul style="list-style-type: none"> - All necessary approvals are in place before bringing fuel, oil or chemicals onto the site; - Fertilisers and pesticides shall be applied if and where necessary and shall be done according to regulations or application instructions; - The use of chemical pesticides shall be avoided and minimized (quantity and frequency); - Biological Control Agents (BCA) shall not be used; 	Daily observations when fertilisers and pesticides are applied Weekly observations to	Project Manager

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> ○ Arbouricides shall not be sprayed and use shall be avoided where possible; - Monitor areas where chemicals are used. If there is environmental degradation, cease the use of chemicals and liaise with the environmental manager; - Store fuels or chemicals away from surface or groundwater areas; - All chemicals shall be labelled with the correct contents and safety, hazards or handling instructions; - An inventory of chemicals shall be maintained (Chemical Register to be kept); - All primary containers shall be fit for purpose and should not be damaged; - All chemicals should be stored in an area with a contained impermeable surface; - Ensure the storage area is lockable and kept clean and organised; - Locate storage away from surface water and groundwater area; - Have spill kits available where chemicals are stored and used; - Ensure chemicals are not exposed to heat; and - Storage of fertilisers and fuels together is prohibited. 	<p>identify any impacts from the use of fertilisers and pesticides.</p>	
Heritage	Potential heritage discovery	When uncovering archaeological remains the following measures (chance find procedure) shall be applied:	Daily	Project Manager

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<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 and inform the Project Manager with the GPS position if possible; and - If works cannot proceed without damage to findings, the site manager to inform the Project Manager who will get in touch with an archaeologist who will provide advice. 		
Emergency Incidents	Soil and water contamination due to inadequate control or accidental release of hazardous substances on site	<p>Safe handling of fuel on-site</p> <p>Storage</p> <ul style="list-style-type: none"> - Separate hazardous and non-hazardous chemicals from each other; - Label chemicals appropriately; - Chemicals with different hazard symbols should not be stored together - clear guidance on the compatibility of different chemicals can be obtained from the Materials Safety Data Sheets (MSDS) which should be readily available; - Store chemicals in a dedicated, enclosed and secure facility with a roof and a paved/concrete floor with a bund; - Diesel tanks should be completely contained within secondary containment such as bunding; 	Daily	All staff members

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Consider the feasibility of substituting hazardous chemicals with less hazardous alternatives; and – 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. <p>Spills</p> <p>Spill kits with the following items as a minimum should be made available on site:</p> <ul style="list-style-type: none"> – Absorbent materials; – Shovels; – Heavy-duty plastic bags; – Protective clothing (e.g., gloves and overalls); and – Major servicing of equipment shall be undertaken offsite or within appropriately equipped workshops. <p>Servicing</p> <ul style="list-style-type: none"> – For small repairs and required maintenance activities all reasonable precautions to avoid oil and fuel spills must be taken (e.g., spill trays, impervious sheets); – Provision of adequate and frequent training on spill management, spill response and refuelling must be provided to all onsite staff; – No refuelling is to take place within 50 meters of groundwater boreholes, surface water bodies or streams; 		

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> – Vehicles and machinery are to be regularly serviced to minimise oil and fuel leaks; and – All major petroleum product spills (spill of more than 200 litres per spill) should be reported to the Ministry of Mines and Energy (MME) on Form PP/11 titled “Reporting of major petroleum product spill’. <p>The following points, therefore, apply to all areas on the site:</p> <ul style="list-style-type: none"> – 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; and – Isolate the area as required. <p>The following measures are to be implemented in response to a spill:</p> <ul style="list-style-type: none"> – Spills are to be stopped at the source as soon as possible (e.g., close valve or upright drum); – Spilled material is to be contained to the smallest area possible using a combination of absorbent material, earthen bunds or other containment methods; – Spilled material is to be recovered as soon as possible using appropriate equipment. In most cases, it will be 		

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<p>necessary to excavate the underlying soils until clean soils are encountered;</p> <ul style="list-style-type: none"> – All contaminated materials recovered after a spill, including soils, absorbent pads and sawdust, are to be disposed of at an appropriately licenced facility for hazardous waste; – A written incident report must be submitted to the general manager. 		
Soil disturbances	Potential soil erosion during heavy precipitation or strong winds within farm boundaries at cleared areas	<ul style="list-style-type: none"> – Indigenous vegetation could be planted to prevent erosion; – Rock beds could also be used to prevent erosion on the gentle slopes around the buildings; and – An erosion control plan could be developed and implemented on-site at areas with steeper slopes. 	Monthly	Project manager/Proponent
	Construction and installation of the pipelines	<ul style="list-style-type: none"> – Holes excavated for the pipelines should preferably be as narrow as possible to avoid unnecessary soil disturbances; – Construction vehicles should stay on existing roads as far as possible to prevent soil compaction in the field; – Vehicles should not drive in the field in wet conditions; and – Pipelines should be effectively buried with the soil excavated and as far as possible represent the ground surface before excavation. 	Daily	Contractor/ Project manager

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
<p>Waste management</p>	<ul style="list-style-type: none"> - Nuisances - Land use - Burning of waste (air pollution) 	<ul style="list-style-type: none"> - Training and Toolbox Talks; - Good housekeeping across the site; - All working areas shall apply good housekeeping; - Implement the waste management hierarchy across the site: Avoid, reuse, recycle and then dispose of; - Waste shall be collected from all harvesting areas and brought to a dedicated central waste collection area where it shall be separated. The dedicated central waste area shall be fenced to prevent spreading into the environment and people and animals entering; - Waste storage areas shall be kept clean and tidy at all times; - Waste shall be removed regularly to avoid pests and bad odours; - Only combustible waste shall be burnt. Hazardous waste shall not be burnt; - If required, waste to be burnt shall be dry to reduce the amount of smoke and increase the combustion rate; - Water buckets or other fire control / extinguish methods shall be at the fire pit; - Burning takes place only on days when winds are light and blowing away from people; - Waste is burned in manageable volumes, so the fire does not get out of control; - The fire is started, attended and monitored at all times by authorized and qualified personnel. Employees 	<p>Daily and weekly</p>	<p>Project Manager Employees</p>

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<p>undertaking burning activities shall remain at a safe distance upwind of the fire;</p> <ul style="list-style-type: none"> – 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. 		
	<p>Environmental pollution (littering and poor storage of solid waste)</p>	<ul style="list-style-type: none"> – Waste management should be handled by following the International Finance Corporation (IFC) standards as follows: – Implement a waste management plan (from “cradle to grave” methodology) covering all aspects of waste generated on-site; – Solid waste shall be stored in an appointed area in covered, tip-proof metal drums/skips for collection and disposal to an approved waste management site; – The waste storage areas shall always be kept clean and tidy; – Storage of domestic waste on site may result in the attraction of unwanted scavengers and should be removed as soon as it is feasible; – Return packaging of hazardous and non-hazardous materials (wherever possible), such as empty bags for reuse; 	<p>Daily/Weekly</p>	<p>Project Manager Employees</p>

Receptors	Potential impacts	Mitigation control measures	Monitoring requirements	Responsibility
		<ul style="list-style-type: none"> - Solid wastes should be deposited/emptied regularly. - See the material safety data sheets available from suppliers for disposal of contaminated products and empty containers; - Liaise with the governing body (municipality/council) regarding the waste and handling of hazardous waste; - 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. 		

6 REGISTER OF ENVIRONMENTAL RISKS

6.1 INTRODUCTION AND KEY RISKS

An environmental review of the proposed Project has been completed to identify all the commitments and agreements made within the environmental scoping report for the amended portions of the Project. From this, a schedule 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 construction phase. Monitoring criteria to be adhered are listed under the specific monitoring plan and/or programme.

It has been evaluated that all risks associated with the quarrying activities are minor. All mitigation measures have been incorporated into this EMP.

7 IMPLEMENTATION OF THE EMP

The proposed project will be carried out in compliance with the relevant regulations. Minor to moderate significant impacts are anticipated for the activities that have been identified and management and mitigation measures are in place for potential risks.

This EMP:

- Has been prepared pursuant to a contract with the proponent
- Has been prepared based on information provided to ECC up to June 2023
- Is for the sole use of the proponent, for the sole purpose of an EMP
- Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP, and
- Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP on the basis of information provided by the proponent and the environmental scoping report.



REPUBLIC OF NAMIBIA
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

ENVIRONMENTAL CLEARANCE CERTIFICATE

ISSUED

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

TO

Three Musketeers Investment (Pty) Ltd
P O Box 1321, Tsumeb

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

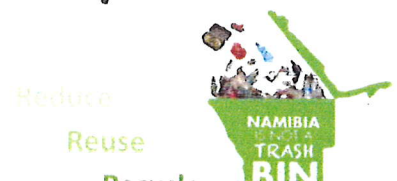
Irrigation project to produce plants and fresh produce on Farm !Uris 481,
using excess clean wastewater from Tschudi Copper Mine,
Oshikoto Region



Issued on the date: 2022-12-19

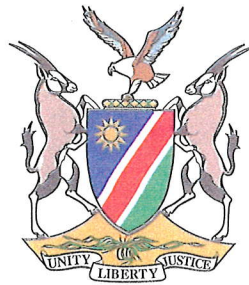
Expires on this date: 2025-12-19

(See conditions printed over leaf)



CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment, Forestry and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

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Private Bag 13306
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Namibia

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

NOTIFICATION OF DECISION

REF NUMBER: ECC 2200063

DATE OF ISSUE: 19 December 2022

DETAILS OF PROPONENT:

Three Musketeers Investment (Pty) Ltd

P. O. Box 1321

Tsumeb

Namibia

Dear Sir/ Madam

SUBJECT: NOTIFICATION ON APPLICATION FOR ENVIRONMENTAL CLEARANCE TO UNDERTAKE THE PROPOSED LISTED ACTIVITY: Irrigation project to produce plants and fresh produce on Farm !Uris 481, using excess clean wastewater from Tschudi Copper Mine, Oshikoto Region, Namibia

Notice is herewith given in accordance with section 37(2) of the Environmental Management Act, Act 7 of 2007 and Environmental Impact Assessment Regulations of 2012 (GG 4878): that a decision in respect to your application No. **APP 221102000241** for Environmental Clearance Certificate to undertake a listed activity has been reached.

DECISION

An Environmental Clearance Certificate (ECC) to undertake the listed activities specified in the environmental assessment report and draft management plan dated May 2022, is granted (**ECC 2200063**). The applicant / proponent is therefore advised to comply with conditions of approval set out in **Section C** of this notification.

A. DETAILS OF THE PROPOSED ACTIVITY

“Stop the poaching of our rhinos”

A1: TITLE OF THE PROPOSED ACTIVITY

Irrigation project to produce plants and fresh produce on Farm !Uris 481, using excess clean wastewater from Tschudi Copper Mine, Oshikoto Region, Namibia

A2: DETAILS OF ASSESSMENT PRACTITIONER

Environmental Compliance Consultancy PO Box 91193, Klein Windhoek, Namibia Tel: +264 81 669 7608 Email: info@eccenvironmental.com

A3: LOCATION OF PROPOSED ACTIVITY

(Annexure A – proposed site map)

B. RELEVANT LISTED ACTIVITIES

Legislation	Description of Listed Activity	Relevance to Proposed Activity
Regulation 29 of Government Notice No. 29 of 2012	AGRICULTURE AND AQUACULTURE ACTIVITIES	Irrigation project to produce plants and fresh produce on Farm !Uris 481, using excess clean wastewater from Tschudi Copper Mine, Oshikoto Region, Namibia

C. CONDITIONS

C1: Conditions of Approval

1. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants.
2. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project.
3. Regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored throughout this process.
4. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.

C2: Clearance Certificate Validity

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office.
2. On expiry of the ECC, the proponent is required to submit within a period not exceeding one month, and in the prescribed form and manner an application to the Office of the Environmental Commissioner for the renewal of the ECC.




14. Non-compliance with a condition of this Environmental Clearance Certificate or EMP may render the Proponent liable to criminal prosecution.

D. DISCLAIMER

The decision taken by the Office of Environmental Commission is based mainly on information provided by the proponent or their representative, therefore, it must be noted here that the proponent is accountable for any wrong and misleading information that may have been presented in the environmental assessment documents.

Yours sincerely,

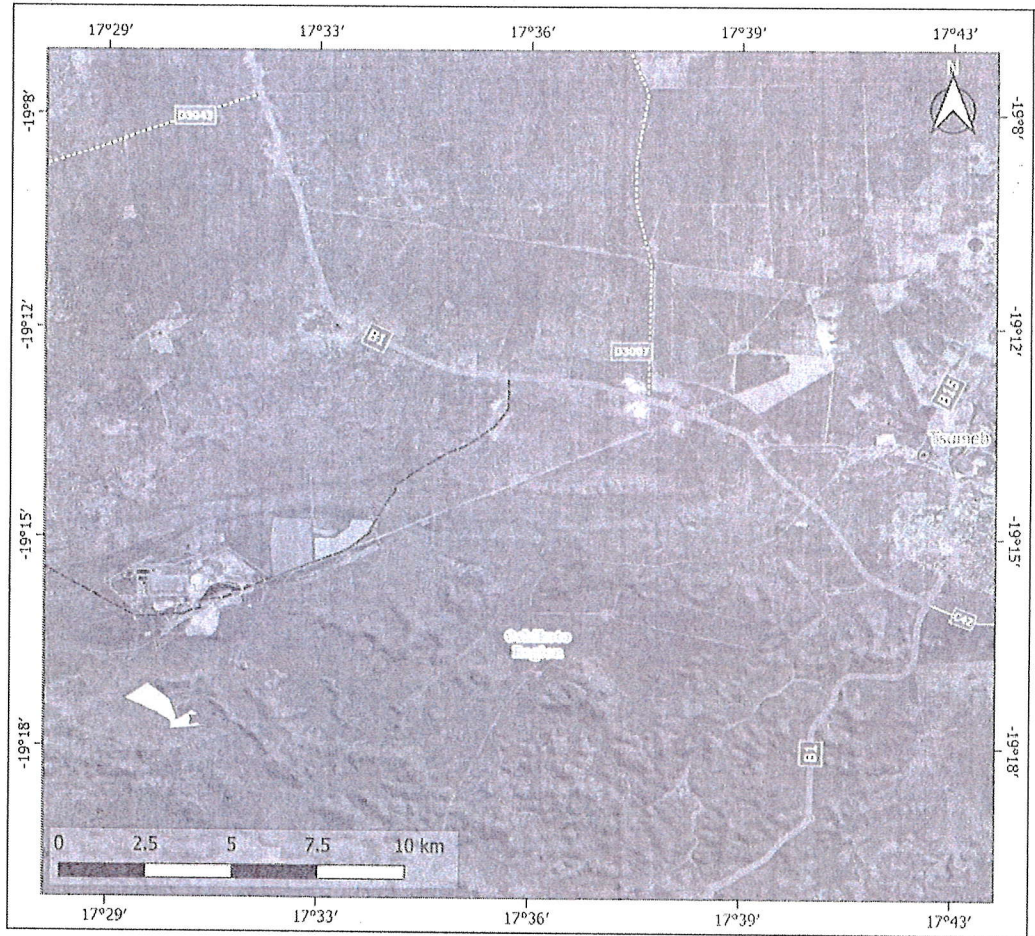


Timoteus Mufeti

ENVIRONMENTAL COMMISSIONER



ANNEXURE A: SITEMAP / SITE LAYOUT



[Handwritten Signature]

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM
Private Bag 1303
WINDHOEK, NAMIBIA
19 DEC 2022
ENVIRONMENTAL COMMISSIONER
REPUBLIC OF NAMIBIA