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ECC-88-234-REP-22-D

ENVIRONMENTAL MANAGEMENT PLAN

Exploration Activities on EPL 7213, 7214 and 7342 For Base and Rare Metals, Industrial Minerals and Precious Metals in Kunene and Otjozondjupa Region

PREPARED FOR

Votorantim Metais

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DEFINITIONS AND ABBREVIATIONS

ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence

1. INTRODUCTION

1.1. BACKGROUND TO THE PROPOSED PROJECT

Environmental Compliance Consultancy (ECC) has been engaged by the proponent (Votorantim Metals Namibia (Pty) Ltd) to undertake an Environmental Impact Assessment (EIA) and an Environmental Management Plan (EMP) in terms of the Environmental Management Act (EMA), no. 7 of 2007 and its Regulations. An environmental clearance application will be submitted to the relevant competent authorities: the Ministry of Mines and Energy (MME) and the Ministry of Environment and Tourism (MET).

Votorantim undertakes mineral exploration in Namibia and proposes to undertake low impact exploration activities on EPL 7213, 7214 and 7342 for base and rare metals, industrial minerals, precious metals and semi-precious stones in the Kunene and Otjozondjupa Regions (FIGURE 1).

The approximate locations of the EPLs in relation to the nearest towns and settlements are as follows:

- EPL 7213 is located predominantly in the Kunene Region, approximately 60 km north of Outjo (15 km in the C38 road and 45 km in the D2780 road). A small portion of the eastern portion of the EPL lies in the Otjozondjupa Region.
- EPL 7214 is located approximately 40 km west of Outjo in Kunene Region. The C39 road to Outjo runs along the southern boundary of the EPL and will be the main access road to the prospect, and
- EPL 7342 is located approximately 30 km east of Otavi and immediately north of Kombat in Otjozondjupa Region.

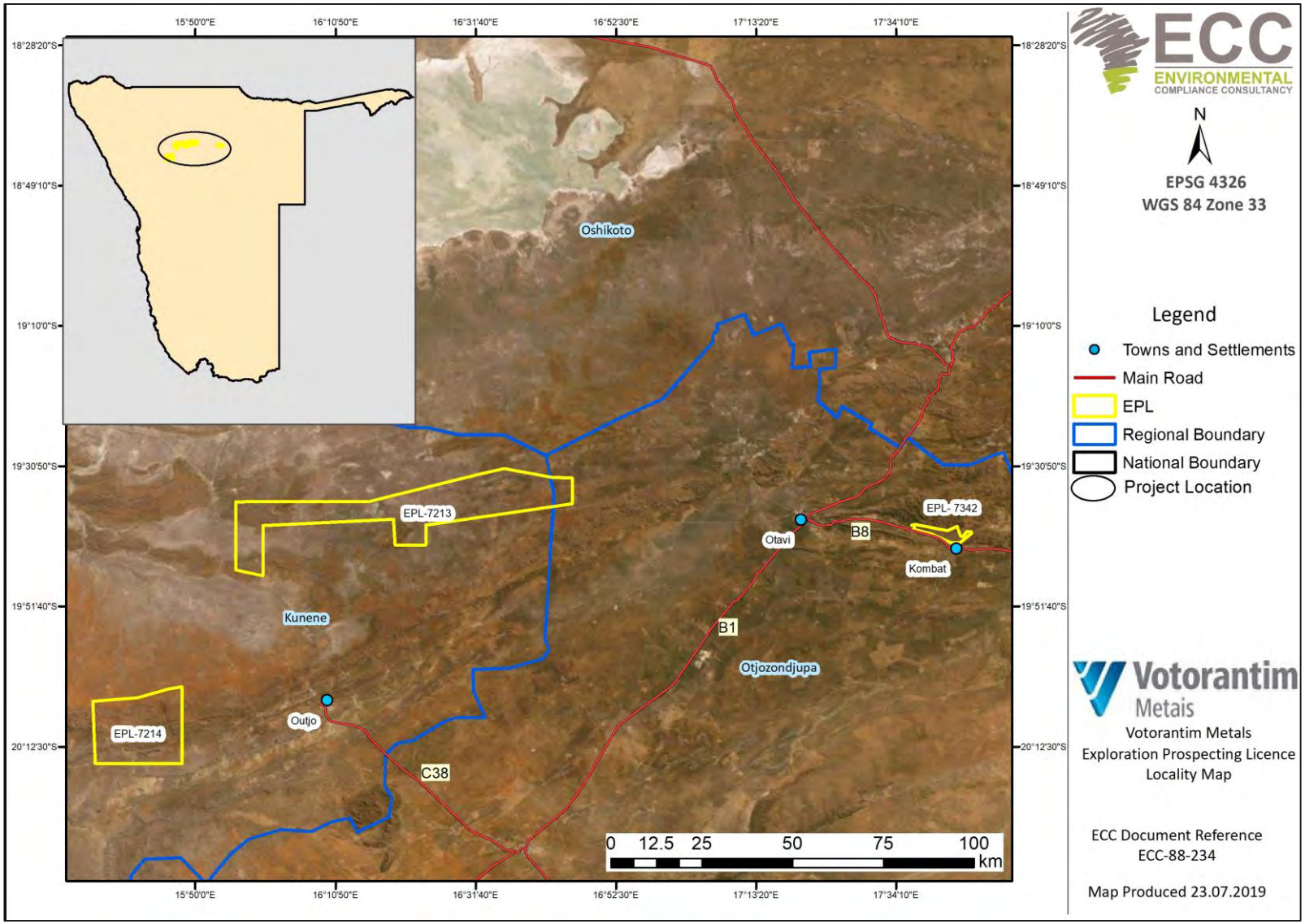

FIGURE 1 - LOCALITY MAP OF EPLS 7213, 7214 AND 7342

1.1 Environmental Regulatory Requirements

The proposed project is considered as a listed activity as stipulated in the Environmental Management Act7 of 2007 and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2012). As a listed activity an application for an environmental clearance certificate is required. An environmental scoping report and Environmental Management Plan (EMP) is required as part of the environmental clearance certificate application, as well as to support the decision-making process. This report presents the EMP and has been undertaken in accordance with the requirements of the Environmental Management Act, 2007 and associated Regulations.

1.2 Purpose and Scope of this Report

This EMP provides a logical framework, mitigation measures 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.

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 shall 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 all activities carried out during the exploration stage in search of base and rare metals, industrial minerals and precious metals on the following EPLs 7213, 7214 and 7342.

1.3 Management of this EMP

The proponent Votorantim Metals Namibia (Pty) Ltd will hold the environmental clearance certificate for the proposed project and shall be responsible for the implementation and management of this EMP. Prior to the exploration activities commencing, this EMP shall 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.

1.4 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 exploration methods alter, this EMP may require updating and potential further assessment undertaken.

1.5 ENVIRONMENTAL CONSULTANCY

Environmental Compliance Consultancy, a Namibian consultancy registration number 2013/11401, has prepared this document on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa in the public and private sector. The CVs of the authors of this report is contained in Appendix A. ECC is independent of the proponent and has no vested or financial interested in the proposed project expect for fair remuneration of professional services rendered.

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1.6 STRUCTURE OF THIS EMP

TABLE 1 - ENVIRONMENTAL SCOPING REPORT SECTIONS

SECTION	TITLE	CONTENT
1	Introduction	This section introduces the EMP and provides background information on the proposed project, proponent and purpose of the report
2	Project Management	Sets the roles of the team responsible for implementing this EMP
3	Communication and Training	Methods for communication the EMP, records and complaints
4	Compliance and Enforcement	Sets out how compliance is monitored, reporting and actions to prevent recurrence
5	Environmental and Social Management	Register of commitments for the project
6	Implementation of the EMP	How to implement the EMP

2 PROJECT MANAGEMENT PERSONNEL

2.1 VOTORANTIM METALS NAMIBIA (PTY) LTD

The proponent shall provide a project team to oversee and undertake the preparation and exploration activities, which shall 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 duration of the project, which shall be supported by the proponent.

2.2 ORGANISATIONAL STRUCTURE, ROLES AND RESPONSIBILITIES

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 personnel are provided with sufficient training, supervision, and instruction to fulfil this requirement, and
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

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 2 – ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITIES & DUTIES
Proponent	– 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, and – Responsible for providing the resources required to complete the project tasks.
Exploration Manager	– Overseeing exploration activities – Monitoring daily operations and ensure adherence by personnel to the EMP – Maintain the community issues and concerns register and keep records of complaints – Maintain an up to date register of employees who have completed a site induction – Ensuring that all contract workers, sub-contractors and visitors to the site are aware of the requirements of this EMP, relevant to their roles and adhere to this EMP at all times – Reporting any non-compliance or accidents – Receiving, 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 and Contractors	– 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 exploration manager.

2.3 CONTRACTORS

Any contractors hired during the exploration activities or for any accessory works for the project 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 management measures
- Reporting of environmental issues, including actual or potential environmental incidents and hazards, to the Exploration Manager, 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, community, stakeholders and relevant 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 clearly 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 local area.

3 COMMUNICATION AND TRAINING

3.1 COMMUNICATIONS

During exploration, the exploration manager shall communicate any 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
- Key project-specific environmental issues briefings.

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 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 exploration manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The exploration manager shall inform the site manager of issues, concerns or complaints. It is the duty of the exploration manager to maintain a complaint register that details the name of the complainant, date and time of the complaint, action 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, in order to refer local 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.

3.3 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.

3.3.1 SITE INDUCTION

All personnel involved in the project shall be inducted to the site with a specific environment and social awareness training component. 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 exploration 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:
    - What is meant by “environment” and “social”

  - Why the environment needs to be protected and conserved
  - How exploration activities can impact on the environment
  - What can be done to mitigate against such impacts
- The inductee's role and responsibilities with respect to implementing the EMP
- The sites environmental rules
- Details of how to deal with, and who to contact if environmental problems should they occur
- Basic vegetation clearing principals and species ID sheets
- Noise control measures for drilling in proximity to residents
- 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 COMPLIANCE MONITORING

DAILY

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

MONTHLY

Monthly inspections shall be 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. Any non-conformance shall be recorded, including a brief description of non-conformance, the reason for the non-conformance, the responsible party, the result (consequence), and the corrective action taken and any necessary follow up measures required.

4.2 NON- COMPLIANCE

4.2.1 NON-COMPLIANCE EVENT

Where it has been identified that works are not compliant with this EMP, the exploration 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 Exploration Manager shall 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 a contravention of this EMP and associated indicators or objectives
- The Exploration Manager and/or contractor have failed to comply with corrective or other instructions issued by the exploration manager or qualified authority, or
- The Exploration 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

4.2.2 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 licence/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.

4.3 ENVIRONMENTAL PERMITS

Whilst the Water Resources Management Act, 2013 is not enforced, it is best practice to adhere to the stipulations while ensuring compliance to the Water Act of 1956 is also maintained. A licence to abstract and use water may be required if boreholes are to be created. If required, the proponent will apply for relevant permits and shall operate in accordance with any conditions in the licence.

Some vegetation shall be cleared on the EPLs' site to allow exploration activities to commence. It is unlikely that an area greater than 15 ha shall be cleared, therefore a permit under the Forest Act, 2001 is not required.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 ENVIRONMENTAL PERFORMANCE MEASUREMENT

This chapter 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 Exploration Manager and updated when necessary.

The Exploration Manager and or Site Manager (if applicable) will use this register to undertake monthly inspections (see next section) to ensure the project is compliant with this EMP.

5.1 OBJECTIVES AND TARGETS

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.

5.2 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. From this, a schedule of environmental commitments and risks has been produced (TABLE 3), which details deliverables including measures identified for the prevention of pollution or damage to the environment during exploration.

TABLE 3 – ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Use of vehicles and equipment	– Hygiene and Safety	– Amenities (e.g. portable toilets) shall be provided and set up in a suitable location (if required).	– Daily observations	– Exploration Manager
	– Emissions	– All vehicles and machinery/ equipment to be shut down or throttled back between periods of use.	– Daily observations	– Exploration Manager
	– The potential loss of oil and fuel causing ground contamination	– Refueling 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 – Drill chemicals need to be approved to be non-hazardous and bio-degradable – Water during drilling should be retained in a lined pond to prevent pollution – A 'good housekeeping' policy shall be adopted across the construction and maintenance working area	– Daily observations	– Exploration Manager
	– Water contamination		– Daily observations	– Exploration Manager
	– Dust generation	– Use existing access roads and tracks where possible – Apply dust suppression methods such as water spraying during drilling operations – Restricted speeds (<30km/h), and – Specific activities that may generate dust and impact on residents shall be avoided during high wind events.	– Daily observations	– Exploration Manager
	– Noise generation	– Noise shall be minimized as much as possible during the exploration works – No hammering of drill rods with steel hammers in proximity to nearby farmhouses – Drill equipment shall be suitably positioned to ensure that noisy equipment is away from human receptors – Noise suppression measures shall be applied if drilling occurs in locations that may affect residents and during evening periods – Residents shall be provided at least two weeks' notice of drilling operations within 1 km of their property, and – Continual engagement with residents shall be undertaken with the proponent.	– Daily observations	– Exploration Manager
General exploration activities	– Loss of access or access affected to	– Access to farms and all farm areas shall always be made available, and – Cattle water holes and feeding areas to remain unaffected.	– Daily observations	– Exploration Manager

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
	the farm and farm areas, and – Farm operations			
Vegetation clearance	– Alien species	– All project equipment arriving on site from an area outside of the project or coming from an area of known weed infestations (not present on the project site) should have an internal weed and seed inspection completed prior to equipment being used – Ensure the potential introduction and spread of alien plants is prevented, and – Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants.	– If required, monitor the removal of the alien invasive vegetation, and – Check the tyre of vehicles after use on site.	– Employees – Exploration Manager
	– Dust generation	– Apply speed restrictions, and – Avoid off road driving.	– Daily observations	– Exploration Manager
	– Reduced soil quality	– Use existing tracks where possible – Refueling to occur in designated areas with drip trays, – Avoid bulldozing in erosion-prone areas, and – Avoid natural drainage lines for exploration activities.	– Daily observations	– Exploration Manager
	– Injure or kill animals	– No driving off designated access routes (into the bush) / off-road driving – No snares or catching of animals, no keeping or housing of pets, and – No animals or birds may be collected, caught, consumed or removed from site by the Contractor or personnel on site.	– Daily observations	– Exploration Manager
	– Removal of vegetation, and – Loss of flora and fauna, protected/important species.	– Use existing tracks where possible – Route new tracks around established and protected trees, and clumps of vegetation – Identify rare, endangered, threatened and protected species. Demarcate and avoid cutting down, and clearly highlight to construction workers so that they are avoided, and – Avoid natural drainage lines.	– Daily visual inspection during construction of new access tracks/widening	– Employees, and – Exploration Manager.

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT/MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Site and ground preparation – creation of access tracks and areas for setting up drill rigs	– Heritage remains	Discovery of unearthed archaeological remains to be uncovered, the following measures (chance find procedure) shall be applied: – Works to cease, area to be demarcated with appropriate tape by the site supervisor, and the Exploration Manager to be informed – Exploration Manager to visit the site and determine whether work can proceed without damage to findings, mark exclusions boundary and inform the Environmental Consultant with the GPS position if possible – If works cannot proceed without damage to findings, Exploration Manager to inform the Environmental Consultant for the archaeologist inspection and advice – Environment Compliance Consultancy's Archaeologist will 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 directed.	– Daily observations	– Exploration Manager
Fuel handling and storage	– Loss of containment leading to ground or groundwater contamination	**Safe Delivery and handling:** – Training employees and Toolbox Talks – Good housekeeping across site – Fuel is handled with care – Spill kits to be available for use during refueling, fuel delivery or use. – Absorption material should be available. Where saw dust is used it should be cleaned up immediately and not left for long periods – Any spill is to be reported to the Exploration Manager once containment has been achieved. – Plant and equipment to be well maintained and serviced regularly, and – In the field, use of hydrocarbons under 200 liters can be used for mobile refueling or servicing. – Fuel spills of greater than 200 liters are to be reported to the MME in terms of the Petroleum Products and Energy Act, 1990 **Storage:** – 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	– Daily observations when fuels are delivered and handled – Supervision during refueling, and – Weekly observations monitor containment and storage.	– Exploration manager

		– Tanks are locked at all times, and – Spill kits available at in suitable locations. **Refueling** – Drip trays to be used during refueling of vehicles and on an impermeable flat surface where possible, and – Funnels should be available and used to avoid spillage during decanting.		
Generation of waste	– Nuisances (odors and visual) – Land use, and – Litter (nuisance and ecological risk).	– Training and Toolbox Talks – Good housekeeping across site – All working areas shall apply good house-keeping – Implement the waste management hierarchy across site: Avoid, reuse, recycle, then disposal through burning or landfill – Waste shall be collected and shall be removed on a regular basis to avoid pests and bad odors, and – It is unlikely that hazardous material and wastes will be produced, however in the event that they do, they shall be managed in a safe and responsible manner so as to prevent contamination of soils, pollution of water and/or harm to people or animals as a result of the use of these materials. Hazardous and non-hazardous waste shall be stored separately at all times.	– Daily observations, and – Weekly checks.	– Exploration Manager, and – Employees.
Resource use	– Inefficient use of water	– Use water effectively and efficiently	– Daily observations	– Exploration Manager – Employees
Job creation	– Employment creation and skills development opportunities during the exploration phase.	– Maximize local employment and local business opportunities – Enhance the use of local labor and local skills as far as reasonably possible – Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible.	– Daily observations, and – Weekly checks.	– Exploration Manager – Employees

6 IMPLEMENTATION OF THE EMP

Exploration work will be carried out in compliance with the relevant requirements of the Minerals (Prospecting and Mining) Act, 1992. No significant impacts are anticipated for the activities that have been identified and management and mitigation measures are in place for potential risks.

This EMP:

A. Has been prepared pursuant to a contract with the proponent

B. Has been prepared on the basis of 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.

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