



Submitted to: Three Musketeers
Investment (Pty) Ltd
Attention: Mr. Andree Neethling
P O Box 1321
Tsumeb
Namibia

REPORT:

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR MINING AND QUARRYING ACTIVITIES ON MINING CLAIM 73963 ON FARM !URIS NO. 481

PROJECT NUMBER: ECC-105-568-REP-06-D

REPORT VERSION: REV 01

DATE: 02 MAY 2025

TITLE AND APPROVAL PAGE

Project Name:	Environmental and social management plan for mining and quarrying activities on mining claim 73963 on farm !Uris No. 481
Client Company Name:	Three Musketeers Investment (Pty) Ltd
Authors:	Environmental Compliance Consultancy
Status of Report:	Final for Government Submission
Project Number:	ECC-105-568-REP-06-D
Date of issue:	02 May 2025
Review Period	NA

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



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

Quality Assurance

Authors:

Kelly Ochs
Environmental Compliance Consultancy

Checked By:

Carlene Baufeldt
Environmental Compliance Consultancy

Approved By:

Jessica Bezuidenhout
Environmental Compliance Consultancy

DISCLAIMER

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.

TABLE OF CONTENTS

1	Introduction	6
1.1	Project background	6
1.2	Environmental regulatory requirements.....	8
1.3	Purpose and scope of this report.....	8
1.4	Management of this ESMP	8
1.5	Limitations, uncertainties, and assumptions related to this ESMP	8
1.6	Environmental assessment practitioner	9
2	Environmental management framework.....	10
2.1	Objectives and targets	10
2.2	Organisational structure, roles, and responsibilities.....	10
2.3	Contractors	12
2.4	Employment	13
2.5	Register of environmental aspects and impacts	13
3	Communication and training.....	18
3.1	Communications.....	18
3.2	Environmental emergency and response	19
3.3	Complaints handling and recording.....	19
3.4	Training and awareness.....	19
3.5	Site induction.....	20
4	Reporting, compliance and enforcement.....	21
4.1	Environmental performance management	21
4.2	Operations: environmental inspections and compliance monitoring	21
4.3	Reporting.....	21
4.4	Non-compliance.....	21
5	Environmental and social management.....	22
5.1	Objectives and targets	22
6	Implementation of the ESMP	23

LIST OF TABLES

Table 1 – Roles and responsibilities.....	11
Table 2 – A list of Project environmental aspects and impacts, as well as associated mitigation and monitoring measures.....	14
Table 3 - Emergency contact details	19

LIST OF FIGURES

Figure 1 - Locality map of the proposed Project.....	7
--	---

ABBREVIATIONS

Abbreviation	Description
DPMT	Dundee Precious Metals Tsumeb
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
km/h	kilometre per hour
Ltd.	limited
MET	Ministry of Environment and Tourism
MIME	Ministry of Industries, Mines and Energy
PPE	personnel protective equipment
Pty	proprietary
SOP	standard operating procedure
ToR	terms of reference
ha	hectares
Mt	million tonnes
km	kilometers

1 INTRODUCTION

1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged as the environmental assessment practitioner (EAP) to conduct an environmental and social impact assessment (ESIA) by Three Musketeers Investment (Pty) Ltd (hereinafter referred to as the Proponent).

The proposed Project involves the small-scale mining and quarrying activities on mining claim 73963, within Farm !Uris No. 481. The Proponent intends to collect silica gravel from the quarrying activities and deliver it to the Sinomine Resource Group Tsumeb smelter, previously owned and operated by Dundee Precious Metals Tsumeb (DPMT). The proposed Project area will be 17.6 ha and the envisioned quarrying quantities per month are 1500 Mt per month. It is expected that operations will continue for a period of 10 years.

The proposed site can be accessed via the B1 road approximately 15 km from Tsumeb, as shown in Figure 1.

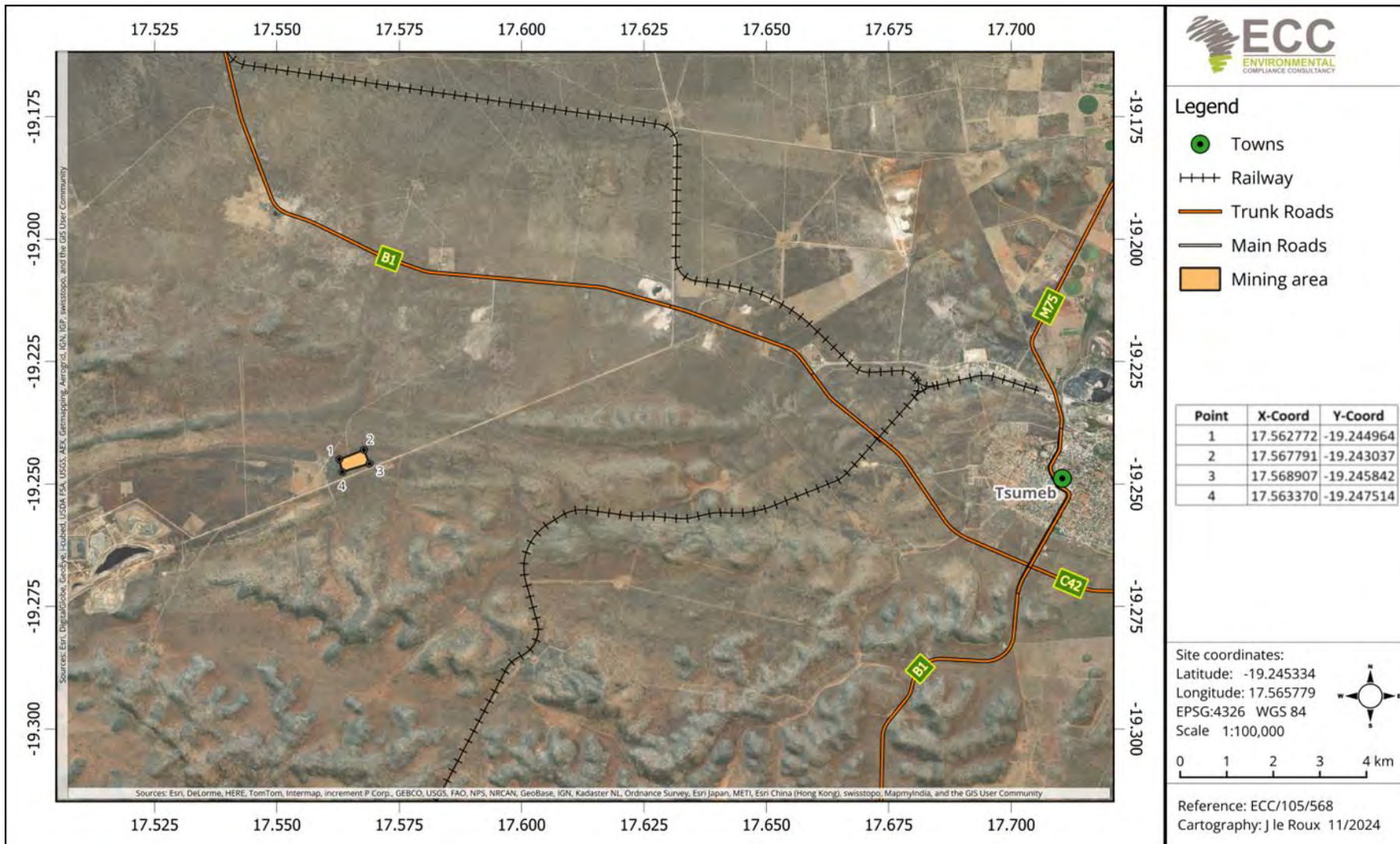


Figure 1 - Locality map of the proposed Project

1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

The proposed Project triggers listed activities as stipulated in the Environmental Management Act, No. 7 of 2007 and its Regulations, promulgated in 2012. An environmental scoping report, environmental and social impact assessment (ESIA) and environmental and social management plan (ESMP) are required to be submitted as part of the application to support the decision-making process for issuing an environmental clearance certificate.

This report presents the ESMP and has been undertaken in terms of the requirements of the Environmental Management Act, 2007 and its Regulations.

1.3 PURPOSE AND SCOPE OF THIS REPORT

The ESMP provides a logical framework, mitigation measures and management strategies for the activities associated with the proposed Project. In this way ensuring that the potential environmental impacts are curbed and minimised as far as practically possible and that statutory and other legal obligations are adhered to and fulfilled. Outlined in the ESMP are the protocols, procedures and roles and responsibilities to ensure the management arrangements are effectively and appropriately implemented.

The scoping report and the ESMP will be separate documents. The ESMP will be included as an appendix to the Environmental Scoping Report and will be based on the findings of the assessment. For additional details regarding the proposed project, assessment methodology, applicable legislation, and assessment findings, the environmental scoping report should be consulted.

This ESMP is a live document and shall be reviewed at predetermined intervals, and or updated during the ESIA process when or if the scope of work alters, or when further data or information is added. All personnel working on the Project will be legally required to comply with the requirements set out in the final ESMP that is approved by the competent authorities and Ministry of Environment, Forestry and Tourism (MEFT).

1.4 MANAGEMENT OF THIS ESMP

The Proponent, will hold the environmental clearance certificate for the proposed Project and will be responsible for the implementation and management of this ESMP. The implementation and management of this ESMP, and thus the monitoring of compliance, will be undertaken through daily duties and activities, as well as monthly inspections.

1.5 LIMITATIONS, UNCERTAINTIES, AND ASSUMPTIONS RELATED TO THIS ESMP

This ESMP 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 ESMP 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 should be amended, and statutory requirements are to take precedence.

The information contained in this ESMP is based on the Project description as provided in the environmental scoping report. Where the design or operation method is different, this ESMP may require updating and potential further assessment may be undertaken.

1.6 ENVIRONMENTAL 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:

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

2 ENVIRONMENTAL MANAGEMENT FRAMEWORK

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

2.1 OBJECTIVES AND TARGETS

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

Environmental objectives for the Project are as follows:

- Zero pollution incidents;
- Minimal vegetation clearing and earthworks; and
- Minimal soil disturbances and disruption.

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 ESMP;
- Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfil this requirement;
- Ensuring that any persons allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood; and
- Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this ESMP, and meet the responsibilities listed above.

Table 1 lists the roles and responsibilities allocated to different management levels in the company and specific personnel.

Table 1 – Roles and responsibilities

Role	Responsibilities and duties
Proponent	– Responsible for the overall management and implementation of the ESMP; – Ensure environmental policies are drafted/updated and communicated to all personnel throughout the company; – Responsible for providing the resources required to effectively run quarrying operations and comply with the ESMP; – Appoint all managers needed to ensure effective running of operations; and – Ensure systems for proper induction and training of personnel and contractors are in place.
Operations / mine manager	– Responsible for ensuring compliance with this ESMP including overseeing the day-to-day quarrying activities during operations, and routine and non-routine maintenance work; – Ensure all personnel are aware of the commitments made in the ESMP and any other relevant regulatory requirements applicable to the Project; – Responsible for the management, maintenance and revision of the ESMP; – Ensure adequate resources are made available for implementation of this ESMP; – Maintain the community issues and concern register, and keep records of complaints; – Ensure all employees and contractors participate in a site induction process before commencing work on the project and maintain an up-to-date register; – Provisioning of environmental awareness/management training and inductions for all employees; – Ensure that the best environmental practice is undertaken throughout the Project; and – Report any non-compliance or accidents to the regulatory authority.
Site manager	– Appointed to manage the performance of the operational and potential maintenance activities; – Responsible for implementation and compliance of this ESMP; – Managing the preparation and implementation of method statements for certain activities, and ensuring the environmental manager reviews all method statements and the relevant environmental protocols are incorporated; – Reporting any non-compliance or accidents to the operations / mining manager and health, safety and environmental (HSE) officer

Role	Responsibilities and duties
	– Ensuring that all staff have attended a site induction session before the commencement of any work on-site and that they are adequately informed of the requirements of this management plan; – Ensuring that all contract workers, sub-contractors and visitors to the site are conversant with the requirements of this ESMP, relevant to their roles on site and adhere to this ESMP at all times; and – Receiving, responding to and recording complaints.
Employees/contractor employees	Responsible for being compliant with this ESMP throughout the quarrying operational work, in addition to: – Ensuring they have undertaken a site induction and are conversant with the requirements of this ESMP; – Ensuring appropriate briefings for certain activities have been provided and fully understood; – Adherence to this ESMP at all times; and – Reporting of any operations and conditions that deviate from the ESMP or any non-compliant issues or accidents to the site manager
Health, safety and environmental (HSE) officer	– A health, safety and environmental officer for the Project will be available, as required, throughout the operations of the Project; – Ensuring and maintaining zero lost time injuries; – Assessing risks on the operational site; – Ensuring a safe working environment; and – Carrying out inductions to employees and or contractors for operations activities such as; site safety rules and procedures, risk assessments and hazard identification, safe operation of equipment and machinery, emergency response procedures, fall protection and manual handling and ergonomics.

2.3 CONTRACTORS

Any contractors hired during the operational phase of the Project shall be compliant with this ESMP and shall be responsible for the following:

- Undertaking all quarrying and maintenance activities in accordance with this ESMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements;
- Implementing appropriate environmental and safety management measures to minimise the impact of silica extraction on the surrounding environment;
- Reporting of environmental issues, including actual or potential environmental incidents, impacts and safety hazards, to the site manager.

- Ensuring appropriate corrective or remedial action is taken to address all environmental impacts 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's regulations for Labour, Health and Safety, and any amendments to these regulations. The following shall be complied with:

- In liaison with local government and community authorities, the Proponent shall ensure that local people have access to information about job opportunities and, where they have the prerequisite skills and experience, are considered first for maintenance contract employment positions;
- The number of job opportunities shall be made known together with the associated skills and qualifications;
- The maximum length of time the job is likely to last for shall be indicated;
- Should foreign workers be hired, the Proponent shall ensure that they have a valid work permit at all times; and
- Every effort shall be made to recruit from the group of unemployed workers living in the surrounding area for positions that entail unskilled work.

2.5 REGISTER OF ENVIRONMENTAL ASPECTS AND IMPACTS

Table 2 provides a list of environmental aspects and impacts, as well as associated mitigation (as derived from the scoping report) and monitoring measures, and the roles responsible for compliance. It will be subject to regular review by the operations / mining manager and updated when necessary. The operations / mining manager and site manager will use this register to undertake monthly inspections (see next section) to ensure the Project is compliant with this ESMP.

Table 2 – A list of Project environmental aspects and impacts, as well as associated mitigation and monitoring measures

Receptors	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
Terrestrial environment and ecology	Increase in invasive species in cleared areas.	– 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. – Ensure the correct removal of alien invasive vegetation and prevent the establishment and spread of alien invasive plants. – Eradicate weeds and alien species as they appear. – Make workers aware about alien species and weeds.	– Daily – Weekly – Annually	– Site manager – employees
	Biodiversity loss and habitat destruction.	– Conduct a biodiversity survey before starting the Project to identify sensitive species and habitats – Minimise land disturbances by limiting mining activities to the designated quarry area. – Implement a restoration plan to re-establish native vegetation and habitats after the Project's completion.	– Monthly	
Soil	Soil quality contamination/pollution from oil spills or chemicals used.	– Accidental spills and leaks (including absorption material) to be collected and cleaned as soon as possible – In the event of spills and leaks, polluted soils must be collected and disposed of at an approved site. – Limit the possibility to mix mineral waste with topsoil.	– Daily – Weekly – Annually	– Operations / mining manager – Site manager

Receptors	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
		– Bioremediation of oil contaminated soil following possible accidental spills should be conducted. – All major petroleum product spills (> 200 L) should be reported to MIME on Form PP/11 titled “Reporting of major petroleum product spill”, issued by the ministry.		
	Soil trampling and possible erosion from excavation.	– Limit the possibility of compaction and creating a hard subsurface. – Limit the possibility of trampling. – Topsoil should be stockpiled separately, and re-spread during rehabilitation. – Create berms or bunds along the perimeter of the quarry site to prevent soil movement and runoff.		
Community	Negative social impacts such as noise, displacement, and dust affecting local communities.	– Engage with the surrounding communities and/ or all stakeholders about the Project activities. – Establish a grievance mechanism to address any complaints from the community regarding the Project. – Ensure the Project follows social responsibility standards and contributes to local development.	– Daily – Weekly – Annually	– Operations / mining manager – Site manager – employees – HSE officer

Receptors	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	Occupational health and safety of workers and nearby community.	– Use the appropriate personal protective equipment (PPE). – Complying with the required standard operating procedures (SOP). – Complying with all applicable national regulations and laws to minimise risks at the workplace. – Comply with all applicable supervision of activities. – Proper use and storage of material and equipment. – Provide training to workers on safe mining practises and emergency response procedures. – Any accidents or incidents should immediately be reported to the project manager. – All incidents should be recorded in an incidental register.		
Air quality	Possible dust emissions from quarrying, crushing, and screening activities which may cause air quality degradation.	– Apply dust suppression where possible. – Restrict speed of vehicles (<30 km/h.) – Specific activities that may generate dust and impact nearby residents. – Dust generating activities should be avoided during strong wind events. – All vehicles and machinery / equipment to be shut down or throttled back between periods of use.	– Fortnightly	– Operations / mining manager – Site manager – employees
Surface and groundwater	Surface and groundwater contamination/pollution	– Where the water table is potentially penetrated, a furrow needs to be dug that diverts the water to vegetation. This can only be done for clean (non-contact) water.	– Daily	– Operations / mining manager – Site manager

Receptors	Potential impacts	Management/mitigation measures	Monitoring requirements	Responsibility
	from oil spills or chemicals used.	- Chemical and hydrocarbon spillages from vehicles, machinery and equipment shall be cleaned up timeously to prevent contamination. - Accidental spills and leaks (including absorption material) to be collected and cleaned. - All major petroleum product spills (> 200 L) should be reported to MIME on Form PP/11 titled "Reporting of major petroleum product spill", issued by the ministry.		
Noise	Noise pollution from machinery, transportation and operations.	- Utilise noise-reducing equipment and enclose noise machinery where possible. - Conduct noise assessments to identify areas where noise levels may exceed acceptable thresholds. - Outside working hours, the noise levels must be limited to the International Financial Corporation residential noise levels (55 dBA- during the day and 45 dBA- at night). - Schedule quarrying and transportation activities during working hours (07:00-17:00) to avoid disturbing sensitive periods for nearby wildlife and communities.	Monthly	- Operations / mining manager - Site manager - employees
Traffic and transportation	Increased use of heavy trucks could lead to road damage, accidents and disturbances to the nearby farmers.	- Schedule transport during off-peak hours to reduce traffic congestion and safety risks. - Ensure all vehicles are well-maintained to minimise emissions and reduce road wear. - Maintain designated haul roads and restrict truck traffic to these roads.	Quarterly	- Operations / mining manager - Site manager - employees

3 COMMUNICATION AND TRAINING

To ensure potential environmental aspects and impacts are minimised, it is vital that personnel are appropriately informed and trained on how to properly implement the ESMP. It is also important that regular communication is maintained with stakeholders (if applicable) and made aware of potential impacts and how to minimise or avoid them. This section sets out the framework for communication and training in relation to the ESMP.

3.1 COMMUNICATIONS

During the Project, the operations / mining manager and site manager shall communicate site-wide environmental issues to the operational team through the following means (as and when required):

- Site induction;
- Audits and site inspections;
- Toolbox talks, including instruction on incident response procedure; and
- Briefings on key Project-specific environmental issues, like feedback on complaints.

This ESMP shall be distributed to the operations team, including any contractors and to ensure that the environmental requirements are adequately communicated. Key activities and environmentally sensitive operations will be highlighted to workers and contractors.

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

3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

An emergency is any abnormal event, which demands immediate attention. It is any unplanned event, which results in the temporary loss of management control at site, but where functional resources can manage the response. An emergency response plan document will be put in place that manages the response in relation to emergencies including environmental emergencies. Table 3 contains a list of numbers to be contacted in case of an emergency.

Table 3 - Emergency contact details

Town	Ambulance	Police	Fire brigade
Tsumeb	+264 67 221004	+264 67 221056	+264 67 221004

3.3 COMPLAINTS HANDLING AND RECORDING

Any complaints received verbally by any personnel on the Project site shall be recorded by the receiver including:

- The name of the complainant;
- The contact details of the complainant;
- Date and time of the complaint; and
- The nature of the complaint.

The information shall be given to the operations / mining manager who is overall responsible for the management of complaints. The operations / mining manager shall do the following:

- Inform the site manager of issues, concerns, or complaints;
- Maintain a complaint register that requires details of the complaint; and
- Provide a written response to the complainant 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 workforce shall be informed about the complaints register, its location and the person responsible, to refer residents or the public who wish to lodge a complaint. The complaints register shall be kept for the duration of the Project and will be available for government or public review upon request.

3.4 TRAINING AND AWARENESS

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

3.5 SITE INDUCTION

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

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

A general site-specific induction that outlines:

- What is meant by “environment” and “social” in the ESMP?
- Why the environment needs to be protected and conserved?
- How can activities impact the environment?
- What can be done to mitigate against impacts?

The inductee's role and responsibilities concerning implementing the ESMP:

- The site's environmental rules;
- Details of how to deal with, and who to contact should any environmental problems occur;
- The potential consequences of non-compliance with this ESMP and relevant statutory requirements; and
- The role of responsible people working on the Project.

4 REPORTING, COMPLIANCE AND ENFORCEMENT

4.1 ENVIRONMENTAL PERFORMANCE MANAGEMENT

The current summary of a register of environmental aspects and impacts identifies mitigation and monitoring measures, as well as the roles responsible for execution. The project manager and site manager will use this register to undertake monthly inspections to ensure the Project is compliant with this ESMP.

4.2 OPERATIONS: ENVIRONMENTAL INSPECTIONS AND COMPLIANCE MONITORING

The operations / mining manager will oversee annual inspections of all infrastructure and equipment associated with the small-scale silica quarrying Project. These inspections will ensure that equipment is functioning as specified, without damage, leaks, or spills. Any non-conformances will be documented, including a description, cause, responsible party, impact, corrective action taken, and any necessary follow-up. Inspections will also assess safety measures, dust control systems, water management, and waste disposal. Any identified issues will prompt corrective actions, with follow-up measures to ensure their effectiveness. Regular monitoring of air, water, and noise quality will also be conducted, with reports submitted to relevant authorities for transparency and compliance.

4.3 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 operations / mining manager.

4.4 NON-COMPLIANCE

Where it has been identified that works are not compliant with this ESMP, the operations / mining manager will implement corrective action to the extent that the works return to being compliant as soon as possible. In instances where the requirements of the ESMP are not upheld, a non-conformance and corrective action notice will be produced. The notice will be generated during the inspections and the operations / mining manager will be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

5.1 OBJECTIVES AND TARGETS

Environmental objectives for the Project are as follows:

- Less than 5 grievances of complaints per year due to operations of the quarrying activities;
- Provide awareness about the environmental and socio-economic importance of the Project; and
- Minimise footprint of mining activities to prevent accidental oil spills, wastewater or chemicals from polluting the surrounding environment.
- Ensuring compliance of mitigation and monitoring measures outlined in Table 2.

6 IMPLEMENTATION OF THE ESMP

This environmental management plan:

- A. Has been prepared according to a contract with the Proponent;
- B. Has been prepared based on information provided to ECC up to April 2025;
- C. Is for the sole use of the proponent, for the sole purpose of an ESMP;
- D. Must not be used (1) by any person other than the proponent or (2) for any purpose other than an ESMP; and
- E. Must not be copied without the prior written permission of ECC.