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DRAFT SOCIAL AND ENVIRONMENTAL MANAGEMENT PLAN

SOCIAL AND ENVIRONMENTAL MANAGEMENT PLAN: PROPOSED MINE EXPANSION PROJECT PHASE 2A ~ SULPHUR HANDLING FACILITY IN THE PORT OF WALVIS BAY

November 2009

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ACKNOWLEDGEMENTS

The authors would like to express their gratitude to the following Rössing Uranium and Rio Tinto employees and Consultants for their co-operation and assistance with the provision of information in the compilation of this report:

Rainer Schneeweiss, Svenja Garrard, Dave Garrard, Reiner Przybylski, Phillip Coetzee and Neill Birdsey.

ACRONYMS

µm	micrometre
CEO	Contractor's Environmental Officer
cm	Centimetre
EMS	Environmental Management System
FIFO	First In First Out
GHG	Greenhouse gases
H&E	Health and Environment
H_2S	Hydrogen sulphide
H_2SO_4	Sulphuric acid
HAZOP	Hazard and Operability
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
HSE	Health Safety and Environment
HSEQ	Health, Safety, Environment and Quality
I&APs	Interested and Affected Parties
IEA	Independent Environmental Auditor
ISO	International Standards Organisation
km/h	Kilometre per hour
ℓ	Litre
m	Metre
M^2	Square metres
MET:DEA	Ministry of Environment and Tourism: Department of Environmental Affairs
mg/m^3	Milligram per cubic metre
mm	Millimetre
MSDS	Material Safety Data Sheet
OHS&E	Occupational Health, Safety and Environment
OHSA	Occupational Health and Safety Act
OHSEC	Occupational Health, Safety, Environment and Community
PCBs	Poly Chlorinated Biphenyls
pH	An expression for the effective concentration of hydrogen ions in solution determining the measure of the acidity or alkalinity of a solution, numerically equal to 7 for neutral solutions, increasing with increasing alkalinity and decreasing with increasing acidity
PM	Project Manager
PMT	Project Management Team
PPE	Personal Protective Equipment
REO	Rössing Uranium's Environmental Officer

Rev	Revision
Rössing Uranium	Rio Tinto Rössing Uranium Limited
S	Sulphur
S&EP	Social and Environmental Policy
SEIA	Social and Environmental Impact Assessment
SEMP	Social and Environmental Management Plan
SO_2	Sulphur dioxide
SO_3	Sulphur Trioxide
t	Tonne
WBBT	Walvis Bay Bulk Terminal

CONTEXT AND BACKGROUND

SOCIAL AND ENVIRONMENTAL IMPACT ASSESSMENT

Rio Tinto Rössing Uranium Limited (Rössing Uranium) has operated an open pit uranium mine in the Erongo Region of Namibia since 1976. Figure 1 overleaf provides a locality map for the mine. Although of considerable extent, the Rössing Uranium ore body is of a low grade and consequently large volumes of rock have to be mined and processed to extract the powdered uranium concentrate that is the final product.

As a result of the recent upward trend in uranium prices on the international market, and projected further increases in future, Rössing Uranium is able to consider possible expansion of its operations. The increased demand for uranium is primarily driven by rapidly growing international energy demands and associated increased future reliance on nuclear energy. Rössing Uranium is thus considering extending its mine plan. Consequently, the associated social and environmental issues are being assessed in a multiphase Social and Environmental Impact Assessment (SEIA[1]), focusing on specific expansion project components.

In terms of the Namibian Constitution (Government of Namibia, 1990) and relevant environmental legislation, in particular the Environmental Management Act (Act No 7 of 2007), the proposed expansion activity would require authorisation from the responsible authorities before it can be undertaken. Insofar as the social and environmental acceptability of Rössing Uranium's proposed expansion project is concerned, the Ministry of Environment and Tourism's Directorate of Environmental Affairs (MET:DEA) would need to issue a clearance for such expansion, based on comments from the Ministry of Labour and Social Welfare.

A SEIA has thus been commissioned by Rössing Uranium for their proposed expansion project, as required by the Environmental Assessment Policy (MET, 1995) but also informed by the principles of the Environmental Management Act and the Labour Act, as well as the internal standards and guidelines prescribed by Rio Tinto, Rössing Uranium's parent company. The clearance would be based on the outcomes of the SEIA, as documented in the various reports that underpin the entire assessment process.

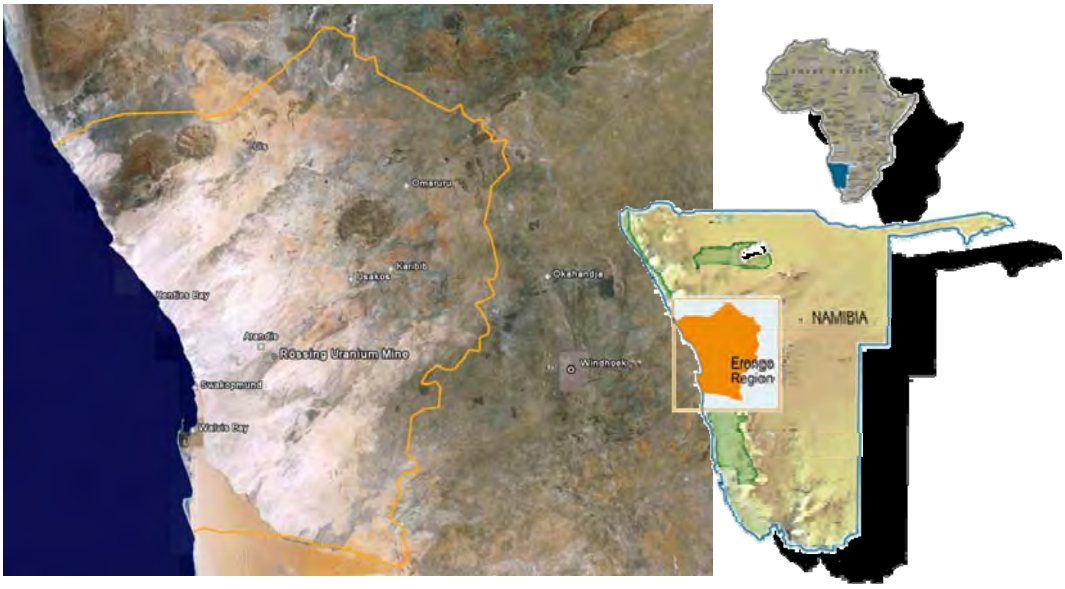

Figure 1: Locality map[2]

[1] It is recognised that the term "environment" when applied in the context of an environmental impact assessment refers to the total environment, encompassing both the socio-economic and biophysical environments. However, Rössing Uranium prefers to retain the term "social" in the title of the present environmental impact assessment, as a clear indication of their commitment to the human element in the affected environment and in keeping with their Sustainable Development Frameworks.

[2] Source: Rio Tinto Rössing Uranium Limited

The entire extent of the envisaged expansion of the Rössing Uranium mine would comprise, in summary, nine individual components. These are being dealt with in two phases of the SEIA process, as follows:

- A sulphuric acid manufacturing plant with associated sulphur storage on the mine, and the transport of sulphur from the Port of Walvis Bay;
- A radiometric ore sorter plant;
- Mining of an ore body known as SK4;
- ***Sulphur handling in the Port of Walvis Bay.*** ***Current SEIA***
- Extension of the current mining activities in the existing SJ pit;
- Increased waste rock disposal capacity;
- Increased tailings disposal capacity;
- Establishing an acid heap leaching facility; and
- Establishment of a Ripios disposal area.

Phase 1

Phase 2

It should be noted that due to technical reasons, the list of Phase 2 SEIA project components changed since the submission of the Phase 2 final scoping report. Changes are the exclusion of the "New mining activity in the larger SK area" which is no longer pursued, and the addition of "Establishment of a ripios disposal area" to highlight the need to assess this component separately, even though it was always deemed to have been included in "Establishing an acid heap leaching facility" component.

The reason for separating these components into the two main SEIA phases is that the engineering design and detailed feasibility studies for each of the nine components are not occurring simultaneously. This is due to the complex and highly technical nature of the various expansion project components necessitating a sequential approach to the execution of the proposed developments. It is understandable that economic and engineering criteria may influence the feasibility of Rössing Uranium's entire expansion project during the formulation and approval stages of the project cycle.

Originally, the sulphur handling in the Port of Walvis Bay was excluded from the Phase 1 SEIA due to the fact that Grindrod, the lessee and operator of the Bulk Handling Terminal in the Port of Walvis Bay, had embarked on an environmental assessment for a sulphur handling facility themselves. However, since that time, Rössing Uranium has identified additional potential locations for such a facility and wish to assess the suitability of these locations which fall outside the scope of the Grindrod assessment.

The sulphur handling facility has thus been introduced as part of the Phase 2 SEIA process, referred to as Phase 2a. Due to the sulphuric acid manufacturing plant on the mine having already received a clearance from MET:DEA during the Phase 1 SEIA, and its reliance on elemental sulphur as feedstock to operate, it was decided to separate the sulphur handling component in the port from the remainder of the Phase 2 SEIA components. It is thus being subjected to an individual SEIA process in the interests of time and to allow for an earlier clearance than the remaining Phase 2 SEIA components, to be submitted as the Phase 2b SEIA later in the process.

It is normal practice that, should the proposed sulphur handling facility be authorised, the development and implementation of a Social and Environmental Management Plan (SEMP) would be required. The SEMP is designed to mitigate negative impacts and enhance positive impacts associated with the design, construction, operational and decommissioning phases of the project and have been informed by the mitigation measures that have emerged from the SEIA process. So as to allow Interested and Affected Parties (I&APs) and stakeholders to review and have inputs with regard to the management of the proposed facility, the SEMP has thus been compiled ahead of MET:DEA's decision on the matter, so as to form part of the SEIA documentation for public review. The scope of this SEMP covers the proposed sulphur handling facility in the port of Walvis Bay, as described in greater detail in the following section.

PROJECT DESCRIPTION

The Phase 1 SEIA for the expansion project dealt with the proposed establishment and operation of a sulphur burning plant for the production of sulphuric acid at the Rössing Uranium mine and the associated transport of elemental sulphur from Walvis Bay to its storage facility at the mine site. A brief description of this is provided herewith, for ease of reference.

Rössing Uranium's metallurgical process uses sulphuric acid leaching to extract the uranium from the ore. An onsite pyrite burning acid plant was in use until 1997, after which it was converted to burn elemental sulphur imported through Walvis Bay and railed to the mine. This production plant was mothballed in 2000 when prices of imported acid fell below production cost. Since 2000, the entire mine's acid requirements have been imported via the Port of Walvis Bay and railed inland to the mine. Current economic evaluations show that benefit may be gained by establishing a new sulphuric acid production plant at the mine, while continuing to import additional sulphuric acid as and when required.

In essence, the sulphuric acid produced will be converted from elemental sulphur feedstock that is shipped to the Port of Walvis Bay and railed to the proposed acid plant on the mine. The manufacture of sulphuric acid at Rössing Uranium would be done via a two-step oxidation process of elemental sulphur (S) to sulphur trioxide (SO_3) which would be absorbed into a 98.5% sulphuric acid solution (H_2SO_4).

The sulphur will be transported from Walvis Bay to the mine site in approximately 12 railcars, each of 50 t capacity, that can be securely closed and thus limit the risk of spillage. There is an existing railway line between Walvis Bay and the mine which is currently used for transporting sulphuric acid to the mine. Five trains per week are envisaged, delivering 600 t each, thus allowing for the 400 t per day required by the acid plant. Up to 10 000 t of sulphur may be stockpiled at the mine, allowing for a supply period of 25 days. The elemental sulphur would need to be imported in bulk via the Port of Walvis Bay and a sulphur handling facility would thus be required in the port.

The supply ships would need to dock at the Walvis Bay Bulk Terminal (WBBT), which is currently leased and operated by Grindrod, and is located behind berths 7 and 8 in the port. To reduce demurrage costs, ship offloading operations are likely to be run 24 hours a day for the period required to unload the vessel. On this basis, it is estimated that it would take approximately four days to complete the unloading of a supply ship, which will return every 50 days. The preferred option for unloading of sulphur from ship to quayside would entail the use of a truck-mounted Siwertell continuous ship unloader which would lift the sulphur prills from the ship's hold using a continuous screw and place it directly into the trailer of an awaiting tractor trailer.

The unloaded sulphur will then be transported from the quayside to an estimated 3,000m^2 storage shed, where it will remain in stockpile until final transportation to the mine by rail. The preferred method for the transport of sulphur from the quayside to the storage shed entails the use of tractor-drawn side-tipping trailers. These tractors will receive the sulphur directly from the mobile Siwertell and, once loaded, will drive the short haul distance to the storage shed. To ensure an efficient, continuous offloading operation, at least two side-tipping trailers will be required.

The port storage area is likely to comprise of a mild steel frame and fibre-cement sheeting enclosed storage shed with a concrete floor, similar to those in use elsewhere in the port. The storage shed would need to be approximately 3,000m^2 in extent, which would be sufficient to house 20,000 t of sulphur in a single stockpile. Sulphur will be placed in stockpile with the use of an extendable conveyor. Sulphur handling, reclamation and management of the stockpile in the storage shed would be carried out using rubber-tired front-end loaders.

The sulphur stockpile will then be steadily reclaimed and transported by TransNamib via railway to the mine. To meet the demand for the acid production at the mine, it is estimated that five trains per week, comprising 12 hopper wagon railcars of 50 t capacity each, will need to make the journey between the port and the mine. The sulphur will be reclaimed from the port storage shed stockpile by rubber-tired front-end-loader, and loaded into a receiving hopper inside the shed which feeds a fixed loading conveyor and finally the loading bin

mounted above the railway line, under which the railcars are shunted. An overview of the activities associated with the proposed sulphur handling in the port of Walvis Bay is presented in Figure 2, below.

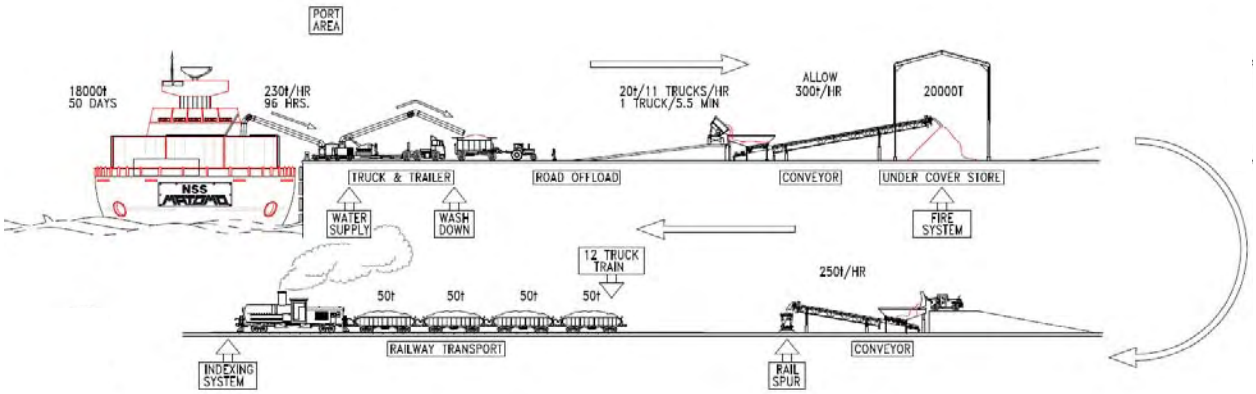

Figure 2: Overview of the Proposed Sulphur Handling Operations in the Port[3]

INTRODUCTION TO THE SEMP

The purpose of this SEMP is to ensure that the key Occupational Health, Safety, Environment and Community (OHSEC) aspects and mitigatory measures identified or recommended during the SEIA process are carried forward and meaningfully implemented during the life cycle of the proposed project. These aspects and mitigatory measures have been derived from the SEIA Report and the key issues and concerns raised by stakeholders and captured during the SEIA process and technical design input by the engineers. In addition, the SEMP is informed by industry best practice for OHSEC management. These considerations are to be integrated within a management system, the result being a working document that can be used as a management tool to ensure responsible OHSEC management on a daily basis and throughout the project life cycle.

The SEMP is structured in four main parts to address the different phases of the project life-cycle from the design phase, through the construction and operational phases, to the decommissioning phase. Each of the first three parts includes an OHSEC mitigation table detailing the mitigation measures proposed and the actions required to implement these measures. Additional detail on the focus of each of these sections is provided below:

Context and Background Section provides an overall introduction and background to the SEMP document and describes its context and structure, serving as an easy reference to the entire SEMP. It includes a project description to which the subsequent sections relate.

Design Phase Section focuses on the management of social and environmental impacts associated with the design phase proposed sulphur handling facility in Walvis Bay. This section describes the OHSEC mitigation measures that need consideration and implementation in the design phase, and relates to the operational phase of the components in that provision has to be made in the design to accomplish certain operational requirements.

Construction Phase Section focuses on the management of social and environmental impacts associated with the construction phase of the proposed sulphur handling facility in Port of Walvis Bay. This section

[3] Source: Modified from Matomo Projects. Rössing Uranium Sulphur Handling. Drawing No: 2600/018-P1-000-001-0-0D (draft). 2008

describes the use and implementation of the OHSEC mitigation measures and details construction phase administrative and contractual arrangements. These mitigation measures deal with general OHSEC issues typical of construction projects as well as those specific to the respective components included in the SEIA. The mitigation measures are presented in a table format and are written in a form and language that is consistent with tender and contract documentation typical of engineering contracts, thus allowing for integration into the tender documents and technical specifications. This integration into the tender and technical specifications is of crucial importance, since compliance with the conditions of the authorising authority as well as the various non-statutory mitigation measures and OHSEC best practice becomes contractually binding on the successful contractor. By entering into contract with Rössing Uranium, the Contractor agrees to comply with the various obligations, as well as including the necessary budgetary provisions in achieving such compliance in the tendered amount.

Operational Phase Section of the SEMP deals with OHSEC management aspects associated with the operation of each component of the sulphur handling facility. This section aims to establish an effective compliance monitoring structure to be integrated into Rössing Uranium's Health, Safety, Environment and Quality (HSEQ) management system, which is certified against the ISO:9001, ISO:14001 and ISO:18001 management systems. The objective is to measure, record and demonstrate ongoing compliance with relevant legislation and Rössing Uranium company policies regarding OHSEC management through implementation of the specified OHSEC mitigation measures.

Decommissioning Phase Section of the SEMP discusses potential OHSEC considerations that should be revisited at the decommissioning phase with regard to the sulphur handling facility. This section is not prescriptive due to there being no absolute certainty regarding the future timing of the decommissioning phase, and the fact that it would be dependent on the final design and operational details.

Since this document could be issued as a standalone document, some duplication of the introductory sections from the SEIA has occurred for ease of reference when looking at this document in isolation.

DESIGN PHASE

This section focuses on the management of social and environmental impacts associated with the design phase of the proposed sulphur handling facility in Walvis Bay. It describes the OHSEC mitigation measures that require consideration and implementation during the design phase, and relates to the operational phase in that provision has to be made in the design to accomplish certain operational requirements.

The mitigation measures presented in this section include those proposed in the SEIA as well as those identified by Rössing Uranium during the preliminary design and concept design phases. Should MET:DEA issue clearance for the proposed project, the design of the facility would also be subject to a Hazop assessment, followed by a detailed design, during which additional mitigation measures may be identified and included in this document. It can therefore be said that the mitigation measures presented in the design phase mitigation table to follow represent the minimum mitigations proposed.

DESIGN PHASE OHSEC MITIGATION TABLE

The OHSEC Mitigation Table included herewith is aimed at facilitating effective OHSEC mitigation implementation during the design phase. To assist with the cross-referencing between OHSEC mitigation prescribed and existing Rössing Uranium ISO EMS procedures, a full list of Rössing Uranium OHSEC procedures (as provided by Rössing Uranium) that may be applicable, has been included as Appendix B. This list is not necessarily exhaustive and could require updating by Rössing Uranium.

Table 1: Design Phase OHSEC Mitigation Table

ID:	Aspect	Management Objective	Management Action
A:01	Prevention and control of the mobilisation and dispersion of sulphur and sulphur derivatives	Prevention and control of sulphur dust arising from the handling, transport and storage of elemental sulphur	Imported sulphur is to be pre-treated with a biocide to prevent biodegradation during transport and handling, reducing the formation and potential release of toxic and corrosive sulphur derivatives during shipping.
A:02			Imported sulphur is to be degassed before importation to reduce the volume of sulphur derived gases in the shipment.
A:03			All conveyor belts and transfer points are to be equipped with appropriate mechanical, pneumatic or water-based dust control systems, including the mobile Siwertell.
A:04			Low speed conveyor belts and appropriate transfer point design and operation to reduce product fall heights, and generally cautious handling of the sulphur will further minimise the generation and mobilisation of sulphur dust.
A:05			Side tipping trailers are to be designed to ensure weather-proofing against both rain and wind. Trailers must be equipped with a cover to allow for protection of the sulphur payloads from the wind during the quayside to shed short haul.
A:06			The fall heights at all transfer points, and any other forms of agitation or abrasion of the elemental sulphur to be minimised.
A:07			The sulphur stockpile to be housed away from the effects of the wind. The design of the shed, especially access points, shall take cognisance of the prevailing and / or high velocity winds in Walvis Bay to prevent gusting or the formation of wind eddies inside the shed.
A:08			The exit point for transport and handling equipment should be equipped with a tyre and undercarriage washing facility. This should ensure that sulphur dust does not migrate on tyres and undercarriage of the equipment. (Note that this relates only to exiting vehicles and the measures should be taken to ensure that vehicles entering the facility are not "dripping" wet, as this could result in the biodegradation of the stockpiled sulphur and the formation of toxic and corrosive sulphur compounds.)
A:09			The shed should be equipped with a wash bay that allows for the washing down of vehicles and equipment on a regular basis or before leaving for off-site maintenance or other reasons. The wash bay should be designed to contain and collect all potentially contaminated wash down water and spray generated during the washing process for further treatment.
A:10			The storage areas should as far as possible work on a first-in-first-out (FIFO) system, ensuring that no "dead" zones occur within the storage facility, where the biodegradation of stockpiled sulphur may advance beyond that of the remainder of the stockpile.
A:11		Prevention, control and treatment of potentially contaminated wash- and rain-water	The shed facility should be equipped with two drainage systems, the first system designed to intercept and redirect any clean storm water around and away from the facility. The second system to collect potentially contained water from around the facility and divert it towards the water treatment facility. The contaminated water system serves as a safety mechanism in the event of a large spillage, fires (related to contaminated fire-suppression water) and trace elements of sulphur that may escape the shed into the immediate surrounds.
A:12			The floor of the shed to be sloped toward the drainage systems to allow for the effective capture of sulphur contaminated water.
A:13			A sufficiently sized drip pad must be provided beyond the wheel cleaning area to allow for potentially contaminated water to drip from the newly rinsed vehicles and still be captured by the contaminated drainage system.
A:14			Water from the on site wash bay and wheel and undercarriage clearing facilities should feed into the contaminated water drainage and then into the water treatment facility.
A:15			Side tipping trailers are to be designed to ensure weather proofing against both rain and wind to minimise generation of contaminated water due to entry of rainwater.

A:16			A water treatment plant that can effectively treat contaminated water from contaminated drainage system, wash bays, and wheel and undercarriage cleaning system and any other sources must be designed and installed. The treatment facility should be able to remove sulphur, sediments and hydrocarbons and have the ability to correct the pH of water before release or re-use. Alternatively, waste water is to be evaporated and the sludge or residue disposed of at an appropriate waste facility or transported to the mine for disposal.
A:17			Where the contaminated drainage system connects to the water treatment facility, provision for a bypass valve should be made, to ensure that under heavy rains the treatment facility is not inundated and incapacitated. Therefore the system should be designed to capture the first 30 minutes of runoff (with the majority of the contaminants) and then the bypass valve can be activated, if needs be.
A:18	Design aspects in the management of risks associated with sulphur and sulphur derivatives	Health and safety of facility workers	Airborne sulphur dust concentrations inside the shed and any other work areas (i.e. hull of the ship) should be kept below 0.125 mg/m^3. this should be achieved through the installation of suitable ventilation systems in conjunction with the dust control systems described in A:03 above.
A:19			The facility must be equipped with showers and eyewash facilities and first aid facilities to be used where workers come into contact with sulphur or its more harmful derivatives.
A:20			The facility should be equipped with alternative escape points that can be used by evacuating workers in the event of a fire, explosion or other emergency situation.
A:21			The facility should be equipped with a siren / alarm that can notify workers of an emergency situation and be used to direct their response to such situations.
A:22			The shed should be adequate lit to allow 24 hour offloading operations to occur safely. It is recommended that incandescent lighting not be used since they may present an increased ignition risk in comparison to their cooler burning fluorescent type lighting.
A:23			The sulphur shed should be equipped with the appropriate detection, personal protective and emergency equipment, to ensure that employees are adequately safeguarded from the potential health effects associated with exposure to high levels of hydrogen sulphide (H_2S) and sulphur dioxide (SO_2) gases. Extraction fans should be installed to allow for the removal of these gases should levels exceed the exposure levels.
A:24			Change rooms and ablution (laundry machine) facilities should be established that allow facilities workers to leave their work clothes at the facility and ensure that they can shower after each shift, preventing the escape of sulphur and sulphur derivatives to their residences where it may cause harm to person and property. The facility should make provision for a contained smoking and cooking area.
A:25		Health and safety of third parties	The shed facility should have an appropriate access control system to protect against unauthorised entrance of pedestrians and vehicles.
A:26		Protection of property, plant and equipment	Where plant and equipment are regularly in direct contact with sulphur, the use of non-corroding materials or coatings to protect the structural integrity of such plant and equipment.
A:27			All plant should undergo regular wash downs, ensuring against the build up of sulphur on the plant, its biodegradation and the release of acidic and corrosive compounds.
A:28			Where necessary, sulphur handling equipment should be constructed from aluminium which resists erosion and does not form pyrophoric iron sulphide that can initiate fires, explosions and generate SO_2.
A:29			The storage areas should as far as possible work on a FIFO system, ensuring that no "dead" zones occur within the storage facility, where the biodegradation of stockpiled sulphur may advance beyond that of the remainder of the stockpile, resulting in the formation of higher risk sulphur derivatives.
A:30		Sulphur fires and dust explosions - prevention and response	Airborne sulphur dust concentrations inside the shed and any other work areas (i.e. hull of the ship) should be kept below 0.125 mg/m^3. This should be achieved through the installation of suitable ventilation systems in conjunction with the dust control systems described in A:03 above.
A:31			Low speed conveyor belts and appropriate transfer point design and operation, reducing product fall heights and generally cautious handling of the sulphur will further minimise the build up and mobilisation of sulphur dust.
A:32			The shed should be fitted with an automated fire extinguishing system that will automatically initiate in the event of a fire. Infrared fire detection sensors should be placed throughout the facility and used to initiate the automated sprinkler system. Such infrared systems are more sensitive than smoke or heat sensing systems.
A:33			Handheld fire extinguishers should be positioned throughout the facility and close to any potential fire hazards / ignition sources.
A:34			The floor of the shed should be surfaced to reduce potential sparking from the use of front-end loaders.
A:35			The fibre-cement sheeting used for the shed walls should be non-static forming, non-spark and corrosion resistant.
A:36			The use of magnetic extraction plant to remove spark causing metal fragments from the sulphur should be considered.
			Care must be taken to ensure that potential fire hazards and other flammable materials or installations are kept at appropriate distances or are

			shielded from the main storage area.
A:37			Where necessary, sulphur handling equipment should be constructed from aluminium which resists erosion and does not form pyrophoric iron sulphide that can initiate fires, explosions and generate SO_2.
A:38			All electrical equipment (conveyor belts) and the shed structure should have suitable earthing systems.
A:39			Access to the shed shall be restricted to rubber tired vehicles and plant.
A:40			All internal combustion engines running in the facility should have exhaust systems equipped with appropriate spark arrestors. Attention to the layout of the exhaust systems should also be assessed from an ignition source risk perspective, and if necessary, modifications made to mitigate such risks.
A:41			The facility should make provision for a contained smoking and cooking areas for employees.
A:42			An evacuation plan should be developed and presented to the staff at each work station that will clearly identify the protocols to be followed in the event of an emergency, the location and functioning of the emergency escape routes and doors, and the emergency assembly areas.
A:43	Design considerations relating to the consolidation and integration of the facility and its associated activities in the existing socio-economic environment	Mitigating the visual impacts associated with the facility and its associated operations	Light coloured paints or reflective materials should not be used externally for the shed. Darker grey colours and rougher textures would cause less contrast between the shed and its surroundings.
A:44			The avenue of palm trees seen elsewhere around the Port boundary fences should be extended to create a visual barrier between the public receptors and the industrialised Port area. Rössing Uranium to obtain permission from NamPort and the Municipality to plant such trees.
A:45			The shed should be positioned as close as practical to the neighbouring and similar shed structures so that they are perceived as being a single form and reduce the protrusion effect of the structure as seen by the closest receptors.
A:46			Flood lighting of extensive outdoor areas and up-lighting of vertical structures or equipment should be avoided.
A:47			Lighting in and around the facility should adopt the principle of downward facing, task-specific lighting with limited spillage of light into the surrounding areas and should generally be kept to the efficient minimum.
A:48		Traffic management in the port area	Discussions with neighbouring enterprises should be held to ascertain their requirements regarding access to and from the dockside, especially where these routes may need to be shared. Where there may be interference, appropriate management systems or mitigations must be agreed upon.
A:49		Mitigating fugitive noise from the sulphur handling shed and associated operations	All potential excessive sources of noise from plant or operational areas should be considered in the layout and design of the facilities. Where appropriate, such areas or equipment should be enclosed or designed and fitted with suitable noise dampening devices or methods.
A:50	Resource usage and waste and waste management considerations	Energy efficiency	The sulphur shed should make use of passive lighting, so that day-time operations can occur without the need for artificial lighting.
A:51			Energy efficient electrical components should be installed as a matter of preference.
A:52			Consideration must be given to the size of plant to be utilised for dock to shed hauling and in-shed sulphur handling with regard to optimal capacities.
A:53		Water efficiency	If possible, the water treatment facility should be equipped with a reservoir to retain treated effluent for reuse as wash water at the wash bays and wheel cleaning areas.
A:54		Effluent management	Waterborne toilets and sewage systems to tie in with the existing sewers in the port area.
A:55			A water treatment plant must be designed and installed that can effectively treat contaminated water from contaminated drainage system, wash bays, and wheel and undercarriage cleaning system and any other sources. The treatment facility should be able to remove sulphur, sediments, hydrocarbons and have the ability to correct the pH of water before release or re-use.
A:56			Where the contaminated drainage system connects to the water treatment facility, provision for a bypass valve should be made, to ensure that under heavy rains the treatment facility is not inundated and incapacitated. Therefore the system should be designed to capture the 30 minutes of runoff (with the majority of the contaminants) and then the bypass valve can be activated, if needs be.
A:57			Contaminated water from the drainage systems must be prevented from entering the sewage system.
A:58		Solid waste management	The facility should be equipped with and appropriate, weather and scavenger (particularly birds) proof waste storage area for the collection and temporary storage of solid, domestic waste.
A:59		Hazardous waste storage and	The facility should be equipped with and appropriate, weather proof hazardous waste storage area for the collection and temporary storage of

A:60		disposal	hazardous waste, including hydrocarbons, sulphur residues and miscellaneous chemicals or materials contaminated by any of the above. Hazardous waste should be disposed of at the hazardous waste cell at the Walvis Bay landfill, or be transported to the mine for disposal.

CONSTRUCTION PHASE

This section focuses on the management of social and environmental impacts associated with the construction phase of the proposed sulphur handling facility in Port of Walvis Bay. This section describes the use and implementation of the OHSEC mitigation measures and details construction phase administrative and contractual arrangements. These mitigation measures deal with general OHSEC issues typical of construction projects as well as those specific to the respective components included in the SEIA. The mitigation measures are presented in a table format and are written in a form and language that is consistent with tender and contract documentation typical of engineering contracts, thus allowing for integration into the tender documents and technical specifications. This integration into the tender and technical specifications is of crucial importance, since compliance with the conditions of the authorising authority as well as the various non-statutory mitigation measures and OHSEC best practice becomes contractually binding on the successful contractor. By entering into contract with Rössing Uranium, the Contractor agrees to comply with the various obligations, as well as including the necessary budgetary provisions in achieving such compliance in the tendered amount.

Organisational Framework

This section relates to establishment of the organisational framework necessary for the implementation of the prescribed mitigation, as included in the OHSEC Mitigation Table for the construction phase of the proposed sulphur handling facility.

SITE ORGANISATIONAL FRAMEWORK

The construction phase for the various components will be administered through an Engineering Contract, of which the OHSEC Mitigation Table shall form part. To ensure that OHSEC considerations receive appropriate attention, it is recommended that an organisational framework be established and that duties and responsibilities for OHSEC aspects of the contract be delegated to specific individuals, thereby ensuring due diligence, capacity and accountability. To this end, the organisational framework presented in Figure 3 on page 12 is proposed.

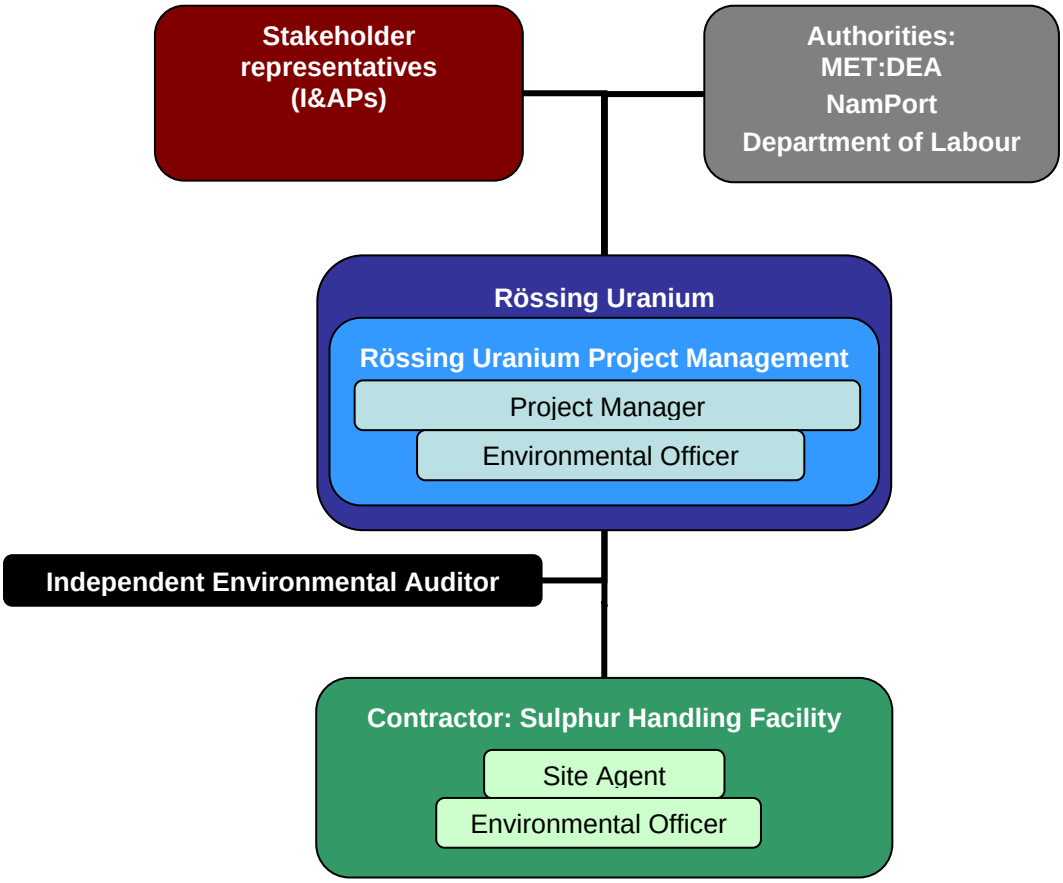

Figure 3: Organisational Framework for Ensuring OHSEC Compliance during Construction Phase

OHSEC management of a construction site remains highly fluid and thus the OHSEC Mitigation Table will not be able to cover every eventuality. It is therefore important that a well-defined organisational framework is in place, detailing delegated responsibilities and allowing for appropriate decision-making on *ad hoc* basis, thus adapting the OHSEC Mitigation Table or management strategies to changing or unexpected situations. The organisational framework and Rössing Uranium's Occupational Health, Safety and Environment (OHS&E) management system also provides an opportunity for co-operative management and sharing of resources between the Contractor[4], Rössing Uranium as the Employer[5] and any other parties directly or indirectly involved in the construction phase. To this affect, the Contractor and Employer should be encouraged to pool their resources to save time and cost expended on OHSEC management.

ROLES AND RESPONSIBILITIES

Table 2 provides an overview of the key roles and responsibilities of the various appointments discussed in this section, as depicted in Figure 3.

[4] The company or organisation appointed by the Employer to undertake the construction task defined in the relevant contract documents.

[5] The entity with whom the appointed Contractor will enter into contract with to undertake the construction task defined in the contract documents, in this case Rössing Uranium.

Table 2: Key Roles of the Various OHSEC Posts

Post / body	Affiliate	Key Role
Authorities	MET:DEA, NamPort and Department of Labour	MET:DEA, Namport and Department of Labour will be invited to attend quarterly feedback meetings where the IEA will deliver the audit findings.
Stakeholder Representatives	Grindrod / API, Protea Chemicals, Walvis Bay Salt Refiners and other entities directly affected by the project or its construction	Stakeholders will be invited to a quarterly feedback session, where their queries can be addressed and concerns tabled.
Independent Environmental Auditor (IEA)	Independent environmental practitioner	Monthly compliance reports to be tabled at the monthly progress meetings. Quarterly compliance auditing of the implementation of the SEMP, OHSEC Mitigation Table and functioning of the various OHSEC appointments.
Rössing Uranium's Environmental Officer (REO)	Qualified environmental / construction supervisor	Facilitation between Rössing Uranium and Contractor on OHSEC matters. Compiling a weekly report on the compliance of the various Contractors in terms of the OHSEC Mitigation Table.
Contractors Environmental Officers (CEOs)	Suitably senior, designated Contractor employee	Day-to-day monitoring and reporting on compliance of the Contractor in terms of the OHSEC Mitigation Table. Planning implementation of the OHSEC Mitigation Table, statutory requirements and *ad hoc* directives.

Monthly Project Meetings

The Independent Environmental Auditor (IEA) shall summarise the findings of his / her monthly compliance report at the monthly project meetings and present the relevant monitoring and compliance records, incident reports and any other information deemed to be of significance. The Project Manager (PM), giving due consideration to the IEA's report findings, with the assistance of the meeting attendees shall determine whether the construction activities have been carried out to an acceptable level of compliance in terms of the various OHSEC requirements.

OHSEC issues will be a standing item on the meeting agenda and status of non-compliance items and proposed corrective actions will be recorded in the minutes.

Stakeholder Feedback

Biannual stakeholder feedback session shall be established and utilised as a forum to provide feedback to the authorities and I&APs on the OHSEC performance and compliance with regard to the SEMP, OHSEC Mitigation Table, authorising conditions and prevailing legislation. The biannual stakeholder feedback session are to be advertised and will provide stakeholders with an opportunity to express concerns and complaints and provides a platform for continued strengthening of capacity and input regarding the OHSEC aspects of the construction phase of Rössing Uranium's sulphur handling facility. It would also strengthen the relationships between Rössing Uranium and the various stakeholders. The REO will be required to present a report on these aspects.

Appointment and brief of the Independent Environmental Auditor

The appointed IEA should be a duly qualified, independent, environmental practitioner with the necessary experience in the construction industry. The position would be a part-time position and should require, on average, 1 or 2 days per month to fulfil the role. It is suggested that the same IEA used to fulfil this role

for the remainder of the proposed expansion project components be used. The IEA's responsibilities include the following:

- Compile formal monthly reports for the Contract, based on~
  - Physical observations during a monthly site inspection,
  - REO's and CEO's daily and weekly internal reports (site diaries);
- Liaise with the Project Management Team (PMT), stakeholders, the general public and the CEOs on *ad hoc* OHSEC matters;
- Undertake quarterly OHSEC compliance audits in terms of the SEMP on the Contractor's activities and present a report to the PMT;
- Have sight of and make recommendations to the PMT with regard to the Contractor's key OHSEC method statements; and
- Present technical matters and issues requiring resolution at the monthly project meetings.

Where non-conformances are identified by the IEA during the quarterly audits and corrective action is requested, the IEA shall sign-off that the necessary corrective actions have been affected, by way of formal letter. Copies of the signed-off corrective actions shall be included in the subsequent audit report.

Appointment and brief of Rössing Uranium's Environmental Officer

A suitably senior member of the Employer's staff should be appointed to the position of Rössing Uranium's Environmental Officer (REO) by means of formal designation. It is recommended that this individual be otherwise affiliated with the administration of the construction contracts and should have a good aptitude for construction activities and the principles of OHSEC management, as well as being sufficiently familiar with Rössing Uranium's HSEQ management system. It is envisaged that the REO would fulfil the same function for the remainder of the expansion project construction Contracts and would hale from the Rössing Uranium Sustainable Development or Health and Safety Department, or be specifically appointed by Rössing Uranium for this purpose.

The REO's responsibilities include the following:

- Advise the IEA and CEOs on Rössing Uranium's HSEQ management system, policies and procedures on OHSEC management to ensure continuity;
- Assist in the facilitation and accommodation of the Contractor's needs on matters relating to compliance with the OHSEC Mitigation Table;
- The establishment and implementation of an OHSEC monitoring programme for the monitoring and recording of construction related impacts;
- Record and report on OHSEC performance of the Contractor against the OHSEC Mitigation Table;
- Undertake a weekly site inspection of each of the Contract area and compile an all-encompassing internal weekly compliance report for submission to the IEA, Project Manager (PM) and the respective CEOs;
- Photograph and investigate any OHSEC incidents and compile reports to form part of the weekly report;
- Liaise with the PM and IEA regarding the review, commenting on and approval of the Contractor's method statements;

- Liaise with the IEA, PM and the CEOs on *ad hoc* OHSEC matters and advising the CEOs on day-to-day OHSEC management issues; and
- Liaise with the PM regarding the quantification and issuing of penalties for non-compliance.

Appointment and brief of the Contractors' Environmental Officers

A suitably senior member of each Contractor's staff should be delegated the responsibilities of the Environmental Officer. The role of the CEO is to ensure the physical implementation of the OHSEC Mitigation Table. The duties of the CEO include:

- Keeping a daily site diary detailing the key events and observations for the day, copies of which shall be submitted to the REO as part of the weekly submissions;
- Compiling the required method statements, or the OHSEC section of the technical method statements, for review and approval by the PMT;
- Establishing and maintaining appropriate management systems for routine OHSEC management tasks, which may include but will not be limited to the following~
    - Waste collection, handling, storage, transport and disposal, including sewerage, domestic, construction and hazardous wastes,
    - Dust control within the area of activity,
    - Noise control within the area of activity,
    - Handling, storage, distribution and storage of hazardous materials, including fuels and lubricants,
    - Establishing and maintaining a program for the maintenance of housekeeping at the works areas,
    - Establishing and maintaining a system for the handling and treatment of contaminated water from construction activities, and
    - Acquiring and maintaining the necessary fire, spillage and other accident and emergency response materials that may be required to deal with and contain the damage caused by such accidents;
- Notifying the REO of OHSEC incidents as well as initiating appropriate response actions to such incidents;
- Initiating and supervising any remedial OHSEC actions;
- Establishing a program and undertaking or ensuring that staff receive regular OHSEC awareness training as part of toolbox talks;
- Liaising with the IEA and REO on technical aspects related to OHSEC matters; and
- Furnishing the REO weekly with the necessary information required for compliance monitoring, which may include certificates of waste disposal, records of public complaints, incidents and accidents, daily site diary entries, labour statistics, etc.

MANAGEMENT TOOLS

The key to effective OHSEC management during the construction phase is to ensure that the requirements of the SEMP, specifically the OHSEC Mitigation Table, are adequately and appropriately implemented on site. The aforementioned OHSEC project organisational framework ensures that sufficient capacity for OHSEC management exists and that the roles and responsibilities have been adequately defined to ensure implementation and accountability. It should be noted that the roles of these various positions may be redefined as the construction phase becomes established and the primary focus of each of the designated positions may shift as the project progresses. Sufficient flexibility must be

allowed for such adaptation and amendment. To ensure that these designated positions operate effectively in establishing and maintaining compliance with the OHSEC Mitigation Table, the following management tools are recommended.

CONSIDERATIONS AT TENDER ADJUDICATION

To ensure that the appointed Contractor has made the necessary financial and resource provisions available to meet the OHSEC obligations in terms of the OHSEC Mitigation Table and SEMP, it is essential that the OHSEC requirements be incorporated in the tender documentation and that the tender adjudication process takes cognisance of these aspects of the tender submissions. The following items are to be included in the tender submissions:

CONTRACTORS' SOCIAL AND ENVIRONMENTAL POLICY

All Contractors should compile a draft Social and Environmental Policy (S&EP) in line with Rössing Uranium's existing Occupational Health, Safety and Environment (OHS&E) policy (refer to Appendix 1), statutory requirements and the OHSEC Mitigation Table. The draft S&EP should be compiled and submitted as part of the tender submission and considered during the tender adjudication process. The S&EP of the successful bidder will, upon award of the contract, be finalised for approval and will form part of the SEMP for the Contract and the Contractor's performance in relation to it shall be evaluated as part of the IEA's quarterly environmental audit.

OHSEC MITIGATION TABLE AND BILL OF QUANTITIES

The OHSEC Mitigation Table is to be included as part of the tender documentation and the Bill of Quantities. The Contractor shall be required to cost the OHSEC aspects that one may need to commit themselves to in undertaking the construction tasks and failure to do so may result in disqualification.

METHOD STATEMENTS

To ensure that adequate forethought is given to the rollout of the construction operations and the implications thereof, the compilation, review and approval of method statements is a well-demonstrated means of ensuring that adequate risk identification and aversion, resource allocation and general planning are in place ahead of the commencement of any major construction task. Once approved, a method statement is to be issued to the Contractor's staff responsible for the implementation, to serve as a work procedure. A method statement should equip a suitably qualified reader with sufficient information regarding the task to allow for implementation without further instruction; in essence the method statement should answer the typical "what? why? where? how? who? when?" questions in sufficient detail. Whilst several OHSEC method statements are prescribed from the outset, each of the technical method statements should contain a subsection that deals with OHSEC considerations specific to that task.

Two categories of method statement can be defined, the first are those that are prescribed by the Contract whereas the second relate to method statements that are requested from the Contractor by the PMT, which address specific *ad hoc* construction issues and are mostly technical in nature. The Contractor shall submit the prescribed method statements within one month after site establishment having occurred. All *ad hoc* method statements shall be submitted to the PMT at least two weeks prior to the commencement of the task, to allow sufficient time for the review and approval process to occur. Except for emergency works with the PM's consent, the Contractor shall not commence any activity until the respective method statement is finalised and approved.

TASK-SPECIFIC RISK ASSESSMENTS

The Contractor is required to submit a site-specific health and safety plan, which includes a task-specific risk assessment. The risk assessment covers environmental, health and safety aspects, work methods

and construction risks associated with each task that the Contractor team will or is likely to perform in the execution of the works. A Contractor shall not commence any activity without having undertaken a task-specific risk assessment. Risk assessments are to be used to inform safe work procedures presented in relevant method statements.

OHSEC AWARENESS

To encourage compliance with the OHSEC Mitigation Table and other statutory requirements, it is essential that all levels of construction workers and management are made fully aware and continually reminded of these obligations. In order to achieve this, the following mechanisms are prescribed. The Contractor at one's own discretion may wish to institute additional measures to enforce the requirements of the OHSEC Mitigation Table.

WORKER HIV/AIDS AWARENESS PROGRAMME

The Rössing Uranium HIV/AIDS Policy of 14 April 2000 currently in place must be extended to the Contractor's workforce. The four key HIV/AIDS programme elements of the Contractor's HIV/AIDS Awareness Programme shall include:

- Prevention, Awareness and Education;
- Voluntary Counselling and Testing;
- Wellness, Counselling and Affordable Treatment; and
- Monitoring and Evaluation.

The Contractor shall be required to submit an HIV/AIDS Awareness Programme, in line with the above requirements, upon the award of the Contract. All levels of the Contractor's staff shall attend an HIV/AIDS awareness course as soon after commencement as is possible, preferably as part of the induction training course. It is recommended that existing Rössing Uranium awareness course be used for this purpose, potentially to be presented by Rössing Uranium staff or that a specialist organisation is commissioned to present such a course.

OHSEC INDUCTION TRAINING

It has become common practice to include the OHSEC aspects of the project as part of the standard worker health and safety induction programme that accompanies the appointment of new staff.

It is recommended that the Contractor submit an OHSEC Induction Training syllabus to the PMT and IEA for approval before the course is presented to the workforce. The CEO, or other suitably qualified person shall present the approved course to all construction staff under the auspices of the REO and IEA. All attendees shall sign an attendance register as well as a Code of Conduct booklet, which will serve as evidence that the individual has been informed about the SEMP, understands and accepts that fines or other punitive measures may be instituted against an offender in the event of non-compliance with the requirements of the OHSEC Mitigation Table and SEMP.

TOOLBOX TALKS

To ensure that the level of OHSEC awareness amongst the construction staff remains high, pertinent, task-related OHSEC considerations shall be presented as an aspect of the toolbox talks or task briefing sessions, at least once a week. Topics shall be relevant to the type of work, and areas or aspects of poor performance and may include handling of certain hazardous materials, housekeeping, dust suppression, water and electricity usage and discussions around recent incidents or issued fines.

SIGNAGE AND INFORMATION POSTERS

Posters and signage depicting the OHSEC "do's" and dont's" should be erected at prominent locations throughout the site. A large signboard should be erected at the entrance to the Contract area to ensure that all visitors and day-workers are made aware of their obligations whilst on the site.

The Contractor shall be held accountable for any transgressions of the OHSEC Mitigation Table within his/her Contract area, whether by his/her personnel or not. It is therefore up to the Contractor to ensure that all persons entering his/her site are authorised to do so and are aware of the various OHSEC controls in effect.

CODE OF CONDUCT BOOKLET FOR SITE WORKERS

The Contractor shall submit a preliminary version of a Code of Conduct booklet as part of the OHSEC Awareness training method statement for review and approval. All site workers shall be issued with a Code of Conduct booklet. After reading the booklet, the front and back page of the booklet is to be signed by the worker, the back page to be removed and kept by the Contractor. The booklet shall contain key information relating to the OHSEC "do's" and "don'ts" on the site. The booklet shall also contain contact details of the Contractor's OHSEC personnel and the applicable emergency numbers. Emergency procedures shall also be included in the booklet as well as a map of the construction site indicating the locations of fire equipment, first aid, emergency assembly points and escape routes.

VISITORS

All visitors to the site will be accompanied by a representative of the Contractor. Should a visitor be required to undertake work on the site for prolonged period they shall be required undergo induction training and to carry a visitor's card.

OHSEC MONITORING

The organisational framework and the posts and briefs of the appointments discussed in under "Roles and responsibilities" on page 12 shall be the means by which responsibilities for the monitoring of construction activity in terms of this SEMP occur. The key roles of the various posts are summarised in Table 2 on page 13. Note that since the SEMP is deemed to include relevant MET:DEA authorisation conditions, such is included in this document as Appendix C.

The OHSEC monitoring role rests with the CEO, who, by virtue of a daily diary entry, will record the actual physical performance of the Contractor in terms of the OHSEC Mitigation Table on a real time basis. The CEO shall also be responsible for ensuring that work is carried out in terms of the approved method statements and OHSEC Mitigation Table and that any deviations or non-compliances are captured in the daily diary entries. The CEO's daily diary entries shall be copied to the REO at weekly intervals.

The REO shall utilise the Contractor's daily diary entries along with on-site observations and any other information available to compile an internal weekly report for the Contract, detailing the performance of the Contractor during that week. The internal weekly report shall be submitted to the PM, who, after reviewing it will disseminate the information to the IEA as well as the respective Contractor.

The IEA's efforts shall be more focused on the implementation and functioning of the various OHSEC positions, systems and their functions, with lesser effort being dedicated toward the resolution of the minor technical or OHSEC site problems. The IEA shall compile a formal monthly compliance report, based on the REO's weekly internal reports, site observations and any other information at his or her disposal. The IEA shall present a summary of report findings at the monthly project meetings.

The Contractor shall notify the PMT of an OHSEC incident or accident as soon as possible and shall submit an incident report within 24 hours of the event. The CEO, REO and relevant health and safety

personnel shall conduct a joint incident investigation and undertake a root cause analysis. The findings of the investigation shall be utilised to update the Contractor's health and safety plan, which may result in the modification of written "safe work procedures", and may also feed into the toolbox talk discussion list.

OHSEC REPORTING

It is essential that the performance or level of compliance of the Contractor in terms of the OHSEC Mitigation Table and other statutory requirements are meticulously recorded to allow Rössing Uranium to demonstrate compliance in terms of the SEIA, SEMP, statutory requirements and conditions of authorisation. The reporting structure also serves as a management tool in that, in particular the IEA's audit reports, will ensure that all the OHSEC designations, key stakeholders and authorities are kept well informed of the Contractor's activities and performance. Table 3 summarises the OHSEC reporting responsibilities.

Table 3: Construction Phase OHSEC Reporting Responsibilities

Report Title	Compiled	Author	Distribution	Content / description
Contractor's Submissions	Weekly	CEO	REO IEA PM	• Daily site diary entry: o Site conditions o General progress description o Description of specific OHSEC problem areas and responses o Description of remedial action taken o Description of progress of remedial work o Incident, accident and event reports o Public complaints o General comments o Labour statistics • Accident and incident investigations and root cause analysis • Task specific risk assessments • Water usage volumes • In house OHSEC fines issued • *Ad hoc* OHSEC performance related items, to be requested by the IEA or the PMT • Electricity consumption
Internal Report	Weekly	REO	CEO IEA PM	• Site conditions • General progress description • Description of specific OHSEC problem areas and responses • Description of remedial action requests • Description of progress of remedial work • Method statement status report including those received, reviewed and approved • Incident, accident reports, investigations and root cause analysis • Public complaints • General comments
Monthly Compliance Report	Monthly	IEA	REO CEO PM	• Response to the REO's reports, highlighting areas of concern and making recommendations where appropriate • Key observations made during a monthly site inspection
Quarterly Audit	Quarterly	IEA	Project Management Meeting Attendees	• Evaluate of the performance of the REO to undertake his/her designated duties • Evaluation of the performance of the CEO to undertake his/her designated duties • Compliance audit of the Contractor in terms of the requirements of the OHSEC Mitigation Table • Scoring on the level of performance

OHSEC AUDITS

The IEA should undertake a quarterly OHSEC audit of the Contract to be presented to the Stakeholder Representatives and authorities at a specific stakeholder meeting or at general Rössing Uranium information sessions. The objective of the audit is to ensure that various posts comprising the OHSEC organisational framework are functioning effectively in terms of their brief, that compliance with the OHSEC Mitigation Table is being achieved, that *ad hoc* decision making on OHSEC matters and the response to any incidents are appropriate and executed effectively. The IEA shall score the Contractor's performance in each audit report. It will also be presented to the contract team at the following project

meeting. Once the audit report is in the hands of the PMT, they will consider whether the Contractor's performance in relation to the OHSEC Mitigation Table is of an acceptable standard.

PENALTIES FOR NON-COMPLIANCE

The PM, on recommendation of the REO and the IEA, shall be the implementing agent with regard to the application of penalties. It should be recognised that when deciding on punitive measures, effective implementation of the OHSEC Mitigation Table is highly dependent on the maintenance of a good working relationship between the REO, CEOs and the IEA. An ill-considered or negative response to non-compliance, particularly minor or unintentional transgressions, may cause a breakdown in these relationships, which in itself could lead to increased environmental risk in terms of the frequency and severity of environmental incidents. It is therefore recommended that the following penalties only be considered when the non-compliant Contractor demonstrates apathy in response to a non-compliance, or is found to be repeatedly or deliberately not meeting his/her obligations.

Withholding Payment

Certain aspects of complying with the OHSEC Mitigation Table will have been priced in the tender documentation. In the event that a Contractor underperforms with regard to a priced item, the PM shall withhold payment on such item until such time as the non-compliance has been rectified.

Removal from Site

In the event that a certain individual or particular plant or machinery is determined to be problematic and the cause of recurring environmental degradation, the PM may issue an instruction to have such person or plant or machinery permanently removed from the site at the Contractor's cost.

Making Good on Environmental Damage

Where the Contractor has not complied with the requirements of the OHSEC Mitigation Table, statutory requirements or PMT directives, all remedial work shall be to the cost of the Contractor and shall be carried out to the satisfaction of the PM, IEA and REO.

Suspension of Works

In the event that the above punitive measures are not having an adequate effect on the OHSEC performance of the Contractor or where OHSEC incident or degradation as a result of the construction activity is severe, the PM may suspend the works until such matters have been resolved to the satisfaction of the PM, IEA and REO. The costs associated with such a work stoppage shall be to the account of the Contractor.

OHSEC PERFORMANCE INCENTIVES

The Contractor is to be encouraged to introduce an incentives programme for employees, rewarding good OHSEC performance. An incentives programme can allow an opportunity for competition and performance motivation between teams or individuals working on the site.

Construction Phase OSHEC Mitigation Table

The OHSEC Mitigation Table included herewith is aimed at facilitating effective OHSEC mitigation implementation during the construction phase, as well as monitoring and auditing thereof. To assist with the cross-referencing between OHSEC mitigation prescribed and existing Rössing Uranium ISO EMS procedures, a full list of Rössing Uranium OHSEC procedures (as provided by Rössing Uranium) that may be applicable, has been included as Appendix B, although relevant references are provided in the Rössing Uranium EMS Reference column of the OHSEC Mitigation Table. This list and column references are not necessarily exhaustive and could require updating by Rössing Uranium.

Table 4: Construction Phase OHSEC Mitigation Table

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:01	Legal compliance considerations	Compliance with legal requirements	Conditions of authorisation by authorities to be incorporated into Final SEMP	Upon receipt of authorisation	Before Construction; MET:DEA conditions of clearance	Project Requirement	Verify paperwork	SEIA Practitioner
B:02			Awarding of Contract not to occur before the authorisation is granted and tendering contractor's have received the conditions of authorisation	Once off	Without exception; MET:DEA conditions of clearance	Project Requirement	Verify paperwork: Date of Contractor appointment	Rössing Uranium Project Management Team
B:03	Ensuring Contractor is committed to responsible OHSEC management and has allocated sufficient resources to realise this	OHSEC and social aspects to be considered during the adjudication of tenders	Contractor's required to undergo Rössing Uranium's prequalification to assess their HSE systems and past performance	Once off at Pre-tender	Without exception	A3 Contractor Management	Verify paperwork	Rössing Uranium Project Management Team
B:04			OHSEC mitigation table to form part of the Tender and Contract Documentation	Once off at Pre-tender	Without exception	Project Requirement	Verify paperwork	SEIA Practitioner and Project Management Team
B:05			OHSEC management tasks identified in the OHSEC Mitigation Table and SEMP must be included in the Bill of Quantities and the Contractor shall be required to allocate finances toward OHSEC management requirements.	Once off at Pre-tender	Without exception	Project Requirement	Verify paperwork	Project Management Team and Contractor
B:06			Contractor required to submit a OHSEC Policy as part of the tender submission that is in line with Rössing Uranium's HSE Policy and the prevailing legislation.	Once off at tender adjudication	In line with Rössing Uranium's HSE Policy	Project Requirement	Verify paperwork	Contractor
B:07	Establish an OHSEC management	Ensuring the implementation of	OHSEC mitigation table to form part of the Tender and Contract Documentation.	Contract term	Without exception	Project Requirement	Verify paper work and tender	Rössing Uranium Project Management

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
	framework to oversee compliance of the construction Contracts	OHSEC management best practice and recommended mitigations during construction					documents	Team
B:08			Rössing Uranium's Environmental Officer (REO) to monitor Contractor's compliance with regard to the SEMP and OHSEC Mitigation Table.	Appointment to occur as soon as possible after the awarding of the Contract and span the Contract Term	Without exception	Project Requirement	Signed letter of appointment including Terms of Reference	Rössing Uranium Project Management Team
B:09			The OHSEC Mitigation Table requires Contractor to appoint a designated Contractor's Environmental Officer (CEO) to undertake compliance monitoring and guide construction activities in line with the SEMP and OHSEC Mitigation Table.	Appointment to occur as soon as possible after the awarding of the Contract and span the Contract Term	Without exception	Project Requirement	Signed letter of appointment including Terms of Reference	Rössing Uranium Project Management Team and Contractor
B:10		Contractually bind Contractor to commitment to sound OHSEC management principles	HSE Policy submitted as part of Tender submission to be implemented by the appointed Contractor. The HSE policy to form part of the Tender adjudication process.	Tender Adjudication and through the Contract Term	In line with Rössing Uranium's HSE Policy and prevailing legislation	Rössing Uranium's 2006 HSE Policy	Verify paperwork	Rössing Uranium Project Management Team and Contractor
B:11			OHSEC mitigation table to Form part of the Tender Documentation.	Pre-tender and tender adjudication	Without exception	Project Requirement	Verify paperwork	Rössing Uranium Project Management Team
B:12			Contractor's to be advised as part of the tender documentation that the Contract will not be awarded to a Tenderer apportioning an unrealistically low amount to OHSEC management.	Pre-tender and tender adjudication	Without exception	Project Requirement	Verify paperwork: Tender Documentation	Rössing Uranium Project Management Team
B:13		Verification of performance through independent involvement and OHSEC monitoring	Rössing Uranium to appoint an Independent Environmental Auditor (IEA) to undertake compliance monitoring and auditing in terms of the SEMP, OHSEC Mitigation Table and other statutory requirements.	Contract Term	Without exception	Project Requirement	Signed letter of appointment including Terms of Reference	Rössing Uranium Project Management Team
B:14			Key stakeholder representatives to be invited to an information session scheduled quarterly.	Contract Term	Representative from MET:DEA, NamPort,	Project Requirement	Attendance register of meeting minutes	Rössing Uranium Project Management Team

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
					Department of Labour and Walvis Bay Municipality			
B:15			OHSEC monitoring programme for the recording of dust, noise and water use to be established and implemented.	Contract term	According to the applicable standards	A1 - General occupational health systems; A3 - Workplace monitoring; A5 - Occupational medical surveillance; A6 - Records; B1 - Particulate and gas or vapour exposures; B2 - Hearing conservation; B10 - Occupational exposure limits; Air Quality Control - Environment Standard; Environmental Management System - Environment Standard; PWMKHAN001 Rev.2; PWMWSM001 Rev.1; PWMWSM002 Rev.1; Water Use and Quality Control - Environment Standard; EMSOPSS001Rev.2 - Monitoring and Measurement; EMSOP002Rev.2 - Communication and Reporting; EMSOPS003Rev.2 - Document Control Procedure; EMSOPS004Rev. 3.0 - Environmental Record Keeping Procedure; ENVESP004 - Monitoring Ambient Dust levels using high volume samplers; ENVINS024Rev.1 - The Control and effective use of the environmental monitoring instruments; ENVOHP008 - Area Respirable Dust;	Compliance with respective standard	REO CEO and IEA

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						ENVOHP009 - Personal respirable dust sampling; ENV/ENG/WSM/003 - Procedure for reporting Contractor's Water Consumption		
B:16		Integrate the management of the construction Contracts into Rössing Uranium's existing OHSEC management framework to ensure continuity	Rössing Uranium's OHSEC management procedures to be made available to the Contractor during the compilation of the various method statements to ensure continuity of management style and best practice.	*Ad hoc*	Achieve similar quality of OHSEC planning to that found on the mine	Various ISO:EMS Procedures relating to water, dust, noise and induction training	Method statements approved and method statement rejected	REO and CEO
B:17	Ensuring adequate OHSEC protections are planned at the commencement	Embody the need for OHSEC planning to form part of the regular planning of construction operations in the Contract	To be specified that each method statement shall contain subsections dealing with OHSEC considerations specific to that task.	Contract term	All method statements to have HSE subsection	Project Requirement	Verification	EIA consultant, Rössing Uranium project Management Team
B:18			The following method statements are to be submitted:	Within 14 day of arriving on site	With out exception	Project Requirement	Verify paperwork	Contractor / CEO
B:19			*OHSEC Awareness Course: Syllabus and logistics regarding the presentation;*			A1.12 (RUL) Induction; A1.8 (RUL) Safety Training Courses; A3 Contractor Management; EMSOPS013Rev1 - Identification of training needs and training methods		
B:20			*Construction Camp Layout and functioning (Including storm water management);*			Project Requirement		
B:21			*Fuel and oils storage area (Including OHSEC protection measures);*			ENVWMP002 - Disposal / re use of Hydrocarbons; ENVWMP010 - Procedure for action taken in the event of an oil/diesel spillage;		
B:22			*Concrete Batching Plant and the management of concrete operations;*			Land-Use Stewardship - Environment Standard		

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:23			*Waste Management System;*			ENV/WMP/002 - Disposal / Re-Use of Hydrocarbons ENV/WMP/005 - Disposal of Redundant Chemicals ENV/WMP/007 - Disposal of Cardboard Boxes, Metal Drums and Wood for Recycling Purposes ENV/WMP/008 - Disposal of Contaminated Items ENV/WMP/009 - Transport of Contaminated Items ENV/WMP/010 - Procedure for Action taken in the event of a Diesel/Oil Spillage ENV/WMP/012 - Procedure for the Disposal of Oil and Diesel Filters		
B:24			*Dealing with Contaminated Water;*			ENV/WMP/008 - Disposal of Contaminated Items; PWM/OPP/002 - Operation of Oil Separation Plant; ENV/WMP/015 - Disposal of Oil Trap Residue to the Oil Separation Plant		
B:25			*Water Use Management Plan;*			PWM/WSM/002 - Water Recycling and Re-use		
B:26			*Extent of areas to be cleared;*			Final Design		
B:27			*Method of undertaking earthworks, including topsoil handling and erosion, dust and noise controls;*			Project Requirement		
B:28			*Use of herbicides, pesticides and other poisonous substances, including means of storage;*			ENV/WMP/008 - Disposal of Contaminated Items; ENV/WMP/005 - Disposal of Redundant Chemicals; ENV/WMP/006 - Disposal practice for the Rössing Uranium Landfill Site		

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B:29			*Dust control, including methods to prevent dust generation and methods to control dust where its generation is unavoidable; and*			ENV/OHP/008 - Area Respirable Dust Sampling; ENV/OHP/009 - Personal Respirable Dust Sampling; B1 - Particulate and gas or vapour exposures		
B:30			*Emergency procedures for spillages of hazardous substances, fire and serious accidents.*			A1.3 - Emergency Planning A1.6 - Storage of Flammable & Explosive Material A1.7 - Risk Assessment B1.5 - Accidents recording and investigations B4 - OH Standards - Hazardous substances EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure EMSOPS010Rev2 - Reporting and investigation of Environmental incidentsEnvironment Standard - Hazardous Material and Contamination Control ENVWMP009 - Transport of contaminated items ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage		
B:31	Communication with Contractor, Contractor's staff and other stakeholders	To ensure that effective and formal communication between the Project Management Team and the Contractor on OHSEC issues and that communication and instruction carry	OHSEC performance to be a fixed item on the agenda of all monthly meetings.	Contract term	Ensure OHSEC aspects are given adequate importance and are not sidelined by technical matters	Project Requirement	Minutes of meetings	Project Manager
B:32			OHSEC operations to be included in the Contractor's programme and reported on in progress reports.	Contract term	Ensure that resources are a allocated and operations undertaken	Project Requirement	Progress reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
		sufficient weight			timeosly			
B:33			The CEO to have sufficient authority in terms of the Contractor's organisational framework to initiate the necessary OHSEC management actions.	Contract term	OHSEC aspects receive adequate attention	Project Requirement	Number of incidents to the contrary	Contractor
B:35			System regarding method statement compilation, submission, review and approval to be rigorously implemented.	Contract term	No construction having commenced without approved method statements, without exception	Project Requirement	REO / IEA reports	All, Project Manager
B:36			All correspondence relating to OHSEC issues between the Contractor and the Project management Team to be signed by the Contractor's Site Agent and the Project Manager respectively.	*Ad hoc*	Document control system in place,	EMSOPS002Rev 2 - Communication and Reporting EMSOPS003Rev 2 - DOCUMENT CONTROL PROCEDURE EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure EMSOPS007 Rev 3 - External Communications/Complaints	Verify paperwork	Project Manager, Site Agent, CEO, REO
B:38	Communication with the external stakeholders	Ensure that the public and various stakeholders have a means of raising concerns and be kept informed of general project progress	Quarterly feedback meetings, regarding general project progress and Contractor's OHSEC performance to be held with Interested and Affected Parties and relevant authorities such as NamPort, Department of Labour and MET:DEA.	Quarterly, throughout contract term	Without exception	Project Requirement	Minutes of meetings and meeting attendance registers	Project Manager
B:39			Contact numbers of the Contractor to be prominently displayed at the entrance to the site as well as the main entrance to the port area.	Contract term	Without exception from commencement	Project Requirement	Physical verification	Contractor
B:40			Public complaints register to be kept by the Contractor, copies to be submitted to the Project Manager and discussed during monthly site meetings.	Contract term	Without exception	EMSOPS007 Rev 3 - External Communications/Complaints	Physical verification and Contractor's weekly submissions	Contractor and CEO

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B:41	OHSEC Awareness and attitude of the Contractor's Staff toward OHSEC matters	Ensuring sufficient OHSEC awareness at commencement	Contractor's OHSEC Induction training course and Code of Conduct Booklet to be submitted and approved.	Submission within 14 days of commencement	Without exception	A1.12 - Induction A1.8 - Safety Training Courses A1.2 - First Responder Training EMSOPS013Rev1 - Identification of training needs and training methods	REO report	Contractor and CEO
B:42			OHSEC awareness induction Course to be presented to all levels of staff at the commencement of construction.	Within 28 days after commencement	All staff to have received induction training	Project Requirement	Signed Code of Conduct Booklet held by each person on site	Contractor and CEO
B:43		Ensuring ongoing OHSEC awareness	OHSEC aspects are to form part regular toolbox talks and task briefing sessions.	*Ad hoc* / monthly	An OHSEC or social topic to be dealt with on at least a monthly basis	EMSOPS013Rev1 - Identification of training needs and training methods	CEO daily dairies and Contractor's weekly submissions	Contractor, CEO and Contractor's team supervisors
B:44			Appropriate OHSEC signage and information posters to be prominently displayed and maintained at key locations across the site, as well as at the entrance to the site.	Contract term	Adequate in the opinion of the REO and IEA	Project Requirement	Physical verification. REO and IEA reports	CEO
B:45			Contractor's OHSEC Policy to be displayed prominently on-site where staff congregate, as well as at the entrance to the site.	Contract term	Adequate in the opinion of the REO and IEA	Project Requirement	Physical verification. REO and IEA reports	CEO
B:46			Rössing Foundation's community health and safety programme and the HIV/AIDS awareness programme to be extended to cover Contractor's Staff.	*Ad hoc*	All Contractor's staff participate in programme	Project Requirement	Attendance register	REO
B:47		Punitive measures and incentives for Contractor's staff	Contractor to be encouraged to adopt a disciplinary system to address common, minor OHSEC misdemeanours of individual staff, such as littering, not using ablution facilities and eating areas, etc.	*Ad hoc*	Reduction in the number of offences over time	Project Requirement	A reduction in the number of fines issued per month, CEO's reports	Contractor/ CEO
B:48			Contractor to be encouraged to introduce a competition amongst teams and a monthly award for the best OHSEC performance.	Monthly	Incentive scheme adopted	Project Requirement	CEO and REO reports	CEO

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B:49	Road safety and traffic control	To reduce the OHSEC impacts associated with increase of traffic on site roads and public roads	All site roads shall be equipped with appropriate warning and information signage to warn neighbouring enterprises.	Contract term	Adequate in the opinion of the REO and IEA. Meets with industry norms and standards	C3.1 - Vehicles and Driving	REO and IEA reports	Contractor
B:50			The movement of all construction vehicles and equipment including suppliers shall be controlled so that they remain on designated routes, are distributed so as not to cause an undue concentration of traffic, are routed and operated in a manner that minimises disruption to other road users or activities in the port, and that all relevant laws are complied with.	Contract term	No public complaints or incidents as a result	C3.1 - Vehicles and Driving; ENVWMP009 - Transport of contaminated items	Public complaints register, REO and CEO reports	Contractor
B:51			Vehicle and plant operators to have undergone the necessary medical and competency evaluations and be in possession of the required licences.	*Ad hoc*	Without exception	A1.12 - Induction C3.1 - Vehicles and Driving B7 - OH Standards - Fitness for work A3.1 - Contractor Management	Health and safety register	Contractor
B:52			Speed limit for heavy equipment shall be restricted to 15 km/h in the Walvis Bay port precinct.	Contract term	Without exception, spot checks undertaken monthly or as required	C3.1 - Vehicles and Driving;	Distance vs. time observations	Contractor / REO / CEO
B:53			All gravel roads under the Contractor's control shall be treated to reduce the fugitive dust losses as a result of vehicle entrainment.	Contract term. Dust suppression continually modified to suite climatic conditions	Dust fallout levels remain within specified tolerances	C3.1 - Vehicles and Driving; B10 - OH Standards - Occupational exposure limits	Dust fallout measurements. Data submitted as part of Contractor's weekly submission	Contractor
B:54			Vehicles shall not be overloaded or used in a manner or for a task for which they are not suited or designed.	Contract term	Without exception	C3.1 - Vehicles and Driving;	REO, CEO and IEA observations	Contractor
B:55			Plant and materials shall be appropriately secured to ensure safe passage between destinations. Loads that pose a risk of dust generation or spillage during transit, including but not limited to sand, stone chip, refuse, paper and cement, shall have appropriate	Contract term	Without exception. No public complaints	C3.1 - Vehicles and Driving;	REO, CEO and IEA observations.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			cover. The Contractor shall be held responsible for any clean-up resulting from the failure by his employees or suppliers to secure transported plant and materials properly.					
B:56			All construction equipment and stationary plant (compressors, generators, etc) shall be equipped with a fire extinguisher.	Contract term, monthly checks on fire extinguisher service validity certificates	Without exception	C3.1 - Vehicles and Driving;	REO, CEO and IEA observation / physical verification	Contractor
B:57			All construction equipment shall be equipped with an audible reverse siren.	Contract term	Without exception	C3.1 - Vehicles and Driving;	REO, CEO and IEA observation / physical verification	Contractor
B:58			In the event that construction work may interfere with port or public traffic, suitable warning signs shall be erected and points men shall be posted to direct the traffic accordingly.	*Ad hoc*	Without exception and adequate in the opinion of the relevant health and safety personal and industry norms and standards	Project Requirement	REO, CEO and IEA observation / physical verification	Contractor
B:59	Potentially hazardous materials	Appropriate storage, use and handling of hydrocarbons	The following method statements are to be compiled by the Contractor and reviewed and approved by the Project Management Team:	Within 14 days of arrival on site and before the commencement of construction of these items	No construction activity before approval	Project Requirement	REO reports and paper trail	Contractor / CEO
B:60			*Location and layout of the construction camp, including hazardous material and fuel storage areas;*			ENVCHP001 - Purchasing of chemicals Environment Standard - Land-Use Stewardship ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP005 - Disposal of redundant chemicals		
B:61			*Location and structure of the fuel storage area, including the type and volume of storage container and the design and capacity of the bund, and procedures for the filling and dispensing of fuel both*			Project Requirement		

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			at the fuel storage area and on site;					
B:62			*Solid waste (refuse) control and removal of waste from the site, including the number, type and location of rubbish bins, the manner and frequency with which the waste will be removed from site and a description of the identified disposal site; and*			ENVCHP001 - Purchasing of chemicalsEnvironment Standard - Hazardous Material and Contamination Control Environment Standard - Non-Mineral Waste Management ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank ENVWMP016 - Used Battery Disposal ENVWMP011 - Disposal of contractor's fluorescent tubes ENVWMP012 Rev 2 - Disposal of oil and diesel filters ENVWMP001 - Redundant Tyres ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP003REV1 - Disposal of oils containing PCB's ENVWMP004 - Disposal of fluorescent tubes ENVWMP005 - Disposal of redundant chemicals ENVWMP006 - Disposal practice for the Rössing Uranium landfill site ENVWMP007 - Disposal of Cardboard Boxes, Metal Drums and Wood for recycling purposes ENVWMP008 - Disposal of contaminated items ENVWMP009 - Transport of contaminated items		

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:63			*Emergency procedures for spillages of hazardous substances.*			A1.3 - Emergency Planning A1.6 - Storage of Flammable & Explosive Material A1.7 - Risk Assessment B1.5 - Accidents recording and investigations B4 - OH Standards - Hazardous substances EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure EMSOPS010Rev2 - Reporting and investigation of Environmental incidents Environment Standard - Hazardous Material and Contamination Control ENVWMP009 - Transport of contaminated items ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage		
B:64			Diesel shall be stored in appropriate storage tanks or in bowsers. The tanks/ bowsers shall be situated on a smooth impermeable surface with a permanent bund. The impermeable lining shall extend to the crest of the bund and the volume inside the bund shall be 130% of the total capacity of all the storage tanks/ bowsers. The floor of the bund shall be sloped, draining to an oil separator.	Contract term	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:65			In the event that any hydrocarbon based compound is dispensed from drums, the proper dispensing equipment shall be used, and the drum shall not be tipped in order to dispense fuel. The dispensing mechanism of the hydrocarbon storage drum shall be stored in a waterproof container when not in use.	Contract term / daily	Without exception. Spills are kept to a minimum	A1.6 - Storage of Flammable & Explosive Material	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:66			Unauthorised access into the fuel storage area shall be prevented by way of fencing and lockable gates.	Contract term / daily	Without exception	A1.10 - 28.5(b) Appointment of Responsible persons: A1.13 - Permit to Work and	Physical verification and routine OHSEC	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						Clearances System A1.16 - Barricading and Demarcation; A1.6 - Storage of Flammable & Explosive Material	monitoring and audit reports	
B:67			The Contractor shall ensure that there is always a supply of absorbent material readily available to absorb/ breakdown and, where possible, be designed to encapsulate minor hydrocarbon spillage. The quantity of such materials shall be able to handle a minimum of 1000 ℓ of hydrocarbon liquid spill. This material must be approved by the Project Manager prior to commencement of construction.	Contract terms / weekly	Without exception	ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:68			The Contractor shall ensure that engine oil, hydraulic oil, shutter oil, bitumen, lubricants and curing compound containers that are in use are stored within a bunded area consisting of a smooth impermeable base with an earth bund. The fuel bund may be used for this purpose as long as the capacity of the bund remains 130% of all of the fuel storage tanks/ bowsers it contains.	Contract term / daily	Without exception	A1.16 - Barricading and Demarcation; A1.6 - Storage of Flammable & Explosive Material	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:69			The unopened storage containers shall be inspected regularly to ensure that no leakage occurs.	*Ad hoc* /daily	Meets specifications, no evidence of leaks or spills	A1.6 - Storage of Flammable & Explosive Material	Physical verification and routine OHSEC monitoring and audit reports	CEO / REO / IEA
B:70			Oil/ curing compound shall be used in moderation and shall be applied under controlled conditions using appropriate equipment to limit spillages. The Contractor shall take all reasonable precautions to prevent accidental and incidental spillage during the application of these compounds.	Contract term / daily	No or limited spillages	ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:71			In the event of oil/ curing compound spill, the source of the spillage shall be isolated, and the spillage contained. The Contractor shall be required to clean	Contract term /daily	Without exception	ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage	Physical verification and routine OHSEC monitoring and audit	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			up the spill, either by removing the contaminated soil or by the application of absorbent material in the event of a larger spill. Treatment and remediation of the spill area shall be undertaken with the appropriate hydrocarbon encapsulators and bioremediation microbes.				reports	
B:72			Oil from drip trays and the oil separator, used oil and any other source of liquid hydrocarbon waste shall be removed on a regular basis to an oil-recycling centre.	Contract term / weekly	Without exception	ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage; ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank ENVWMP012 Rev 2 - Disposal of oil and diesel filters ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:73			The fuel storage area shall be equipped with the appropriate hazard and warning signage, no smoking or naked flame signs and will be equipped with the necessary fire fighting equipment.	Contract term / weekly	Without exception	A1.6 - Storage of Flammable & Explosive Material	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:74		Appropriate storage, use and handling of paints and solvents	The Contractor shall ensure that the use of oil based paints, chemical additives, cleaners and other chemicals is strictly controlled, and that no contamination of the environment (including stockpiled commodities at adjacent facilities), particularly of drainage lines, occurs as a result of their use.	Contract term /daily	Without exception	ENVWMP009 - Transport of contaminated items ENVWMP008 - Disposal of contaminated items ENVWMP006 - Disposal practice for the Rössing Uranium landfill site Environment Standard - Non-Mineral Waste Management Environment Standard - Hazardous Material and Contamination Control ENVCHP001 - Purchasing of chemicals B4 - OH Standards - Hazardous substances B1 - OH Standards - Particulate and gas or	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						vapour exposures A3.1 - Contractor Management A1.6 - Storage of Flammable & Explosive Material A1.19 - Personal Protective Equipment A1.16 - Barricading and Demarcation A1.15 - Colour Coding A1.12 - InductionProduct MSDS		
B:75		Appropriate storage, use and handling of herbicides and pesticides	Where the use of herbicides, pesticides and other poisonous substances has been specified or approve, they shall be stored, handled and applied with due regard to their potential harmful effects and in adherence with the approved Method Statement.	Contract term /daily	Without exception	ENVWMP009 - Transport of contaminated items ENVWMP008 - Disposal of contaminated items ENVWMP006 - Disposal practice for the Rössing Uranium landfill site Environment Standard - Non-Mineral Waste Management Environment Standard - Hazardous Material and Contamination Control ENVCHP001 - Purchasing of chemicals B4 - OH Standards - Hazardous substances B1 - OH Standards - Particulate and gas or vapour exposures A3.1 - Contractor Management A1.6 - Storage of Flammable & Explosive Material A1.19 - Personal Protective Equipment A1.16 - Barricading and Demarcation A1.15 - Colour Coding A1.12 - Induction Product MSDS	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:76			The Contractor shall strictly adhere to the manufacturer's specifications regarding applications rates, storage and safety precautions.	Contract term / ad hoc	Without exception	ENVWMP009 - Transport of contaminated items ENVWMP008 - Disposal of contaminated items ENVWMP006 - Disposal practice for the Rössing Uranium landfill site Environment Standard - Non-Mineral Waste Management Environment Standard - Hazardous Material and Contamination Control ENVCHP001 - Purchasing of chemicals B4 - OH Standards - Hazardous substances A3.1 - Contractor Management A1.6 - Storage of Flammable & Explosive Material A1.19 - Personal Protective Equipment A1.16 - Barricading and Demarcation Product MSDS	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:77			Herbicides or pesticides shall not be used within 50 m of any drainage line or open water body.	Contract term /ad hoc	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:78			The Contractor shall submit a method statement relating to the use of herbicides, pesticides and other poisonous substances, including means of storage.	Prior to bringing such materials onto site	Without exception	ENVWMP009 - Transport of contaminated items ENVWMP008 - Disposal of contaminated items ENVWMP006 - Disposal practice for the Rössing Uranium landfill site Environment Standard - Non-Mineral Waste Management Environment Standard - Hazardous Material and Contamination Control ENVCHP001 - Purchasing of chemicalsB4 -	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						OH Standards - Hazardous substancesB1 - OH Standards - Particulate and gas or vapour exposures A3.1 - Contractor ManagementA1.6 - Storage of Flammable & Explosive Material A1.19 - Personal Protective EquipmentA1.16 - Barricading and Demarcation A1.15 - Colour Coding		
B:79	Site workshop (if required), wash bay, fuel stores and oil separator (if required)	Reduce the OHSEC impacts associated with the design and operation of a site workshop and associated facilities arising from the maintenance and operation of site plant and equipment	The workshop shall have a smooth impermeable floor which shall be bunded and sloped towards a collection drain or sump, connected to an oil separator to contain any spillages.	Contract term /at commencement	Without exception	SEMP Requirement; PWM/OPP/002 - Operation of Oil Separation Plant ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:80			The workshop shall be equipped with a wash bay, enclosed to prevent the loss of hydrocarbons and soap into the surrounding environment. The floor will be bunded and sloped and all waste water shall be fed through an oil separator being released.	Contract term / at commencement / daily or ad hoc inspections	Without exception	SEMP Requirement; PWM/OPP/002 - Operation of Oil Separation Plant ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:81			The refuelling deck is to have a collection sump linked to an oil separator or alternative separation and collection system for approval by the REO.	Contract term / daily inspection	Without exception	PWM/OPP/002 - Operation of Oil Separation Plant ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons A1.6 - Storage of Flammable & Explosive	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						Material		
B:82			The fuel storage area shall be equipped with a bund area equalling 130% the total volume of fuel stored in the area.	Contract term / once off verification	Without exception	ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons A1.6 - Storage of Flammable & Explosive Material; A1.16 - Barricading and Demarcation	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:83			The fuel storage area shall be located in a portion of the construction camp where it is unlikely to pose a significant risk in terms of water pollution or traffic safety.	Contract term /daily	In the opinion of the REO, CEO and IEA	A1.3 - Emergency Planning A1.5 - WSWP & Risk Assessment A1.6 - Storage of Flammable & Explosive Material A1.7 - Risk Assessment A1.8 - Safety Training Courses A2 - OH Standards - Risk management A3.1 - Contractor Management A1.10 - 28.5(b) Appointment of Responsible persons A1.16 - Barricading and Demarcation B4 - OH Standards - Hazardous substances ENV/ENG/SCP/001 - Operation of the Diesel Seepage Collection System in the Open Pit ENV/ENG/WQM/001 - Water Quality Monitoring ENV/ENG/WQM/002 - Water Quality Management Environment Standard - Hazardous Material and Contamination Control	Physical verification and routine OHSEC monitoring and audit reports Contractor Method statement	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge PWM/OPP/002 - Operation of Oil Separation Plant		
B:84			The workshop area shall be equipped with a hydrocarbon spill kit capable of treating a 1000ℓ spill containing the necessary spark proof shovels, personal protective equipment and sufficient collection vessels.	Contract term /daily	Without exception	SEMP Requirement; ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:85			The workshop shall have a sealed-bottom waste storage vessel for hydrocarbon contaminated items such as filters, oily rags, grease drums, contaminated soil and absorbent material from collected spills, etc.	Contract term /daily	Without exception	A2 - OH Standards - Risk management A1.10 - 28.5(b) Appointment of Responsible persons A1.16 - Barricading and Demarcation B4 - OH Standards - Hazardous substances ENV/ENG/WQM/002 - Water Quality Management Environment Standard - Hazardous Material and Contamination Control ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge PWM/OPP/002 - Operation of Oil Separation Plant	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:86			The workshop and fuel storage area shall be equipped with adequate fire fighting equipment, suitable for the type and worst-case scenario fire that may occur there.	Contract term / weekly	Without exception	A1.6 - Storage of Flammable & Explosive Material A1.16 - Barricading and Demarcation	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:87			The fuel storage area shall be fenced off and locked to ensure that no unauthorised entry can be gained. Appropriate safety and hazard warning signage shall be prominently displayed at the fuel storage area.	Contract term /daily	Without exception	A1.6 - Storage of Flammable & Explosive Material A1.20 - Alarm System A1.3 - Emergency Planning A1.16 - Barricading and Demarcation	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:88		Verification of adherence to specified requirements	The workshop, fuel storage area, wash bay and oil separator shall be routinely inspected to ensure compliance with the specified requirements.	Contract term /daily	Without exception	A1.20 - Alarm System A1.16 - Barricading and Demarcation A1.10 - 28.5(b) Appointment of Responsible persons A1.3 - Emergency Planning A1.5 - WSWP & Risk Assessment A1.6 - Storage of Flammable & Explosive Material B4 - OH Standards - Hazardous substances C2 - Electrical Safety C3 - Vehicles and Driving EMSOPS003Rev 2 - DOCUMENT CONTROL PROCEDURE EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure ENV/ENG/WQM/001 - Water Quality Monitoring Environment Standard - Non-Mineral Waste Management Environment Standard - Hazardous Material and Contamination Control ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP005 - Disposal of redundant chemicals ENVWMP008 - Disposal of contaminated items ENVWMP010.Rev 1 - Procedure for action	Physical verification and routine OHSEC monitoring and audit reports	CEO/ REO/ IEA

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						taken in the event of diesel or oil spillage ENVWMP012 Rev 2 - Disposal of oil and diesel filters ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank PWM/OPP/002 - Operation of Oil Separation Plant		
B:89	Vehicle, plant and machine maintenance	Reduce the OHSEC risk associated with equipment or plant malfunction and potential environmental damage	All vehicles and equipment shall be kept in good working order to ensure efficiency and safety and minimise pollution and emissions.	Contract term /daily / ad hoc	Without exception	A3.1 - Contractor ManagementC3 - Vehicles and DrivingB1.1 - Health & Safety off the Job	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:90			All plant and equipment to be inspected daily by the operator to ensure fitness, all defects to be reported and repaired immediately. Leaking equipment shall be repaired immediately or removed from Site.	Contract term /daily	Without exception	C3 - Vehicles and Driving B1.1 - Health & Safety off the Job	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:91			Where practical, all maintenance of equipment and vehicles on Site shall be performed in the workshop.	Contract term /daily	Except when emergency maintenance is required elsewhere on site	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:92			If it is necessary to do maintenance outside of the workshop area, the Contractor shall obtain the approval of the REO prior to commencing activities. The Contractor shall ensure that in his workshop and at other equipment maintenance facilities there is no contamination of the soil or vegetation. This includes those areas where, after obtaining the REO's approval, the Contractor carries out emergency equipment maintenance.	Contract term /daily	Without exception	ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage ENVWMP008 - Disposal of contaminated items Environment Standard - Hazardous Material and Contamination Control	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:93			When servicing equipment on Site, portable drip trays shall be used to collect the waste oil and other	Contract term /daily	Without exception	ENVWMP014 Rev1 - bioremediation of hydro-carbon contaminated soil and sludge	Physical verification and routine OHSEC	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			lubricants. Drip trays shall also be provided in construction areas for stationary equipment (such as compressors) and for "parked" equipment (such as excavators, loaders and cranes).			ENVWMP010.Rev 1 - Procedure for action taken in the event of diesel or oil spillage ENVWMP008 - Disposal of contaminated itemsEnvironment Standard - Hazardous Material and Contamination Control ENVWMP002 Rev1 - Disposal and re-use of hydrocarbonsEnvironment Standard - Non-Mineral Waste Management ENVWMP016 - Used Battery Disposal ENVWMP012 Rev 2 - Disposal of oil and diesel filters	monitoring and audit reports	
B:94			Drip trays shall be inspected and emptied daily. Drip trays shall be closely monitored during rain events to ensure that they do not overflow. Where practical, the Contractor shall ensure that equipment is covered so that rainwater is excluded from the drip trays.	Contract term /daily	Without exception	ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank Environment Standard - Hazardous Material and Contamination Control	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:95			Oil from the drip trays shall be stored in externally clean drums in a bunded area as required for fuel storage at the workshop area.	Contract term /daily	Without exception	ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank Environment Standard - Hazardous Material and Contamination Control	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:96			The washing of equipment outside of the wash bay facility located near the workshop shall be restricted to urgent or preventative maintenance requirements only and is subject to the REO's approval.	Contract term /ad hoc	Without exception	ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP015 Rev 1 - Disposal of oil trap residue to oil separation tank Environment Standard - Hazardous Material and Contamination Control	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:97	Establishment and operation of a concrete batching plant, concrete mixing, pouring and associated activities (IF REQUIRED)	Limiting OHSEC impacts associated with the position and layout of the concrete batching plant	The siting of batching plants shall take cognisance of the requirements of this Specification and shall be subject to the Project Manager's approval of a batch plant layout and operations method statement.	Once off	In the opinion of the REO and Project manager through review and approval of the method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor / CEO
B:98			Batching plant shall be situated a safe distance away from the harbour or major drainage channels and away from depressions that may be subject to flooding.	Once off	Without exception	A1.13 - Permit to Work and Clearances System A1.16 - Barricading and Demarcation A2 - OH Standards - Risk management A1.7 - Risk Assessment Environment Standard - Hazardous Material and Contamination Control Environment Standard - Non-Mineral Waste Management Environment Standard - Water Use and Quality Control Environment Standard - Environmental Management System ENVWMP006 - Disposal practice for the Rössing Uranium landfill site ENV/ENG/WQM/001 - Water Quality Monitoring ENV/ENG/WQM/002 - Water Quality Management	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:99			The siting of the batching plant shall be such to reduce the extent of earthworks required to achieve a suitably level platform.	Once off	Without exception	Environment Standard - Land-Use Stewardship Environment Standard - Environmental Management System	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:100		Limiting potential environmental pollution by concrete, sand, aggregates, additives and associated chemicals	No batching of concrete shall occur directly on unprotected ground. Batching areas shall be located on a smooth impermeable surface (concrete or 250 µm plastic covered with 5 cm of sand).	Contract term /daily	Without exception	Environment Standard - Hazardous Material and Contamination Control Environment Standard - Non-Mineral Waste Management Environment Standard - Water Use and Quality Control ENV/ENG/WQM/002 - Water Quality Management	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:101			All wastewater resulting from batching of concrete shall be disposed of in a purpose built evaporation pond. At demobilisation, the solids shall be retrieved and disposed of at the mine tailings facility or at the Walvis Bay hazardous waste cell. No waste water shall be discharged directly into the environment.	Contract term /daily	Without exception	Environment Standard - Hazardous Material and Contamination Control Environment Standard - Non-Mineral Waste Management Environment Standard - Water Use and Quality Control ENV/ENG/WQM/002 - Water Quality Management ENV/ENG/WQM/001 - Water Quality MonitoringENV/ENG/WSM/002 - Water Recycling and Re-use	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:102			Empty cement bags shall be stored in weatherproof containers to prevent wind blown cement dust and water contamination. Empty cement bags shall be disposed of on a regular basis via the solid waste management system, and shall not be used for any other purpose. Unused cement bags shall be stored so as not to be affected by rain or runoff events.	Contract term /daily	Without exception	ENVWMP007 - Disposal of Cardboard Boxes, Metal Drums and Wood for recycling purposes ENVWMP006 - Disposal practice for the Rössing Uranium landfill site Environment Standard - Environmental Management System Environment Standard - Non-Mineral Waste Management	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:103			The Contractor shall ensure that sand, aggregate, cement or additives used during the mixing process are contained and covered to prevent contamination of the surrounding environment.	Contract term /daily	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:104			Sand stockpiles shall be protected from the dispersive effects of the wind, causing dust, by watering of stockpiles or use of suitable wind barriers.	Contract term / *ad hoc*	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:105			The Contractor shall take all reasonable measures to prevent the spillage of cement/ concrete during batching and construction operations. During pouring, the soil surface shall be protected using plastic and all visible remains of concrete shall be physically removed on completion of the concrete pour and appropriately disposed of.	Contract term /daily	Without exception	Environment Standard - Non-Mineral Waste Management Environment Standard - Environmental Management System ENVWMP006 - Disposal practice for the Rössing Uranium landfill site ENVWMP008 - Disposal of contaminated items ENVWMP009 - Transport of contaminated items	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:106			All spoiled and excess aggregate/ cement/ concrete shall be removed and disposed of via the municipal waste stream.	Contract term / *ad hoc*	Without exception	ENVWMP006 - Disposal practice for the Rössing Uranium landfill site	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:107			Cement trucks and cement mixers shall not discharge any concrete wash directly onto the ground. The Contractor shall submit a method statement for the consideration and approval of the PMT regarding the means by which concrete trucks and mobile mixers would be cleaned and the discharge dealt with.	Contract term /daily	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:108			All concrete additives, curing compounds, shutter oils and other additives used in the process shall be stored in weather proof areas at the batching plant. Containers or drums shall be stored inside a bunded area and any leaks and spills shall be cleared immediately.	Contract term /daily	Without exception	Environment Standard - Non-Mineral Waste Management Environment Standard - Environmental Management System ENVWMP006 - Disposal practice for the Rössing Uranium landfill site ENVWMP008 - Disposal of contaminated items	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						ENVWMP009 - Transport of contaminated items A3.1 - Contractor Management B4 - OH Standards - Hazardous substances ENVCHP001 - Purchasing of chemicals Environment Standard - Hazardous Material and Contamination Control ENVWMP005 - Disposal of redundant chemicals ENVWMP002 Rev1 - Disposal and re-use of hydrocarbons ENVWMP003REV1 - Disposal of oils containing PCB's		
B:109	Dust Control	To maintain a safe working environment, minimise nuisance for surrounding residential areas, prevent damage to the natural vegetation of the area and protect topsoil	Contractor to compile and submit a method statement regarding the control of dust within the designated construction site.	Contract commencement	Without exception	B1 - OH Standards - Particulate and gas or vapour exposuresB10 - OH Standards - Occupational exposure limits	Verify paperwork	Contractor / CEO
B:110			There shall be a water tanker of adequate capacity to enable the dampening of all working areas and unpaved access/ haul roads as frequently as required. During high wind conditions, the Contractor shall comply with the Project manager's instructions regarding additional dust suppression measures.	Contract term / hourly or as dictated by climatic conditions	Dust levels are maintained within the standard	B1 - OH Standards - Particulate and gas or vapour exposures B10 - OH Standards - Occupational exposure limits	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:111			Dust suppression shall take cognisance of water efficiency. The Contractor shall make use of an environmentally friendly dust suppression / wetting agent (e.g. Dust-a-side® or Dustex®) to increase the efficacy of water sprayed for dust suppression purposes and thereby allow for more efficient use.	Contract term /daily	Reduce water usage whilst maintaining an acceptable level of suppression	B1 - OH Standards - Particulate and gas or vapour exposuresB10 - OH Standards - Occupational exposure limitsENV/ENG/WSM/002 - Water Recycling and Re-usePWM/WSM/001 - Fresh Water Supply Management	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:112			Where possible, the Contractor shall use low sediment content contaminated water for the purposes of dust suppression. The source of water used for dust suppression spraying shall be negotiated with Rössing Uranium and NamPort.	Contract term /daily	Without exception	B1 - OH Standards - Particulate and gas or vapour exposures B10 - OH Standards - Occupational exposure limits ENV/ENG/WSM/002 - Water Recycling and	Physical verification and routine OHSEC monitoring and audit reports and Contractor's weekly	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						Re-use PWM/WSM/001 - Fresh Water Supply Management	submissions	
B:113		Verification of adherence to specified requirements in terms of dust prevention and control	Dust monitoring by means of dust visual assessment shall be used to assess the Contractor's dust control programme performance. Where excessive, additional measures will be instituted.	Weekly	In line with Rössing Uranium current Standard	B1 - OH Standards - Particulate and gas or vapour exposures B10 - OH Standards - Occupational exposure limits EMSOPS001Rev 2 - Monitoring and Measurement EMSOPS002Rev 2 - Communication and Reporting EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure HSECOP003 Rev 2 - Environmental Management System Code of Practice	Dust fallout meter results in Contractor's submissions and data captured by Rössing Uranium's existing dust meters	CEO / REO / IEA
B:114	Vehicle Emissions	Reduce unnecessary greenhouse gas (GHG) emissions by poorly maintained or malfunctioning plant and equipment	All vehicles and equipment shall be kept in good working order and serviced at the recommended intervals.	Contract term /daily	Without exception	A3.1 - Contractor Management C3.1 - Vehicles and Driving Environment Standard - Air Quality Control Environment Standard - Greenhouse Gas Emissions	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:115		Verification of adherence to specified requirements in terms of dust prevention and control	Vehicles noticeably emitting excessive fumes will not be permitted to continue working on site.	Contract term / *ad hoc*	Without exception	A3.1 - Contractor Management C3.1 - Vehicles and Driving	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:116	Noise	Noise prevention and reduction	Appropriate directional and intensity settings are to be maintained on all hooters and sirens, and the	Contract term /daily/ *ad hoc*	Without exception	C3.1 - Vehicles and Driving A1.10 - 28.5(b) Appointment of Responsible	Physical verification and routine OHSEC	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			Contractor shall provide and use suitable and effective silencing devices for pneumatic tools and other plant equipment to reduce noise levels associated with his activities.			persons A1.19 - Personal Protective Equipment A3 - OH Standards - Workplace monitoring B10 - OH Standards - Occupational exposure limits B2 - OH Standards - Hearing conservation EMSOPS001 - Monitoring and Measurement EMSOPS002Rev.1 - Communication and Reporting EMSOPS003 - Document Control Procedure EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure EMSOPS007 Rev 3 - External Communications/Complaints ENV/OHP/010 - Area Noise Survey ENVINS024 Rev.1 - The control and effective use of the Environmental monitoring instruments Environment Standard - Noise and Vibration Control	monitoring and audit reports	
B:117			The Contractor shall not use sound amplification equipment on site other than in emergencies.	Contract term /daily / *ad hoc*	Without exception	A3 - OH Standards - Workplace monitoring B10 - OH Standards - Occupational exposure limits B2 - OH Standards - Hearing conservation EMSOPS001 - Monitoring and Measurement EMSOPS007 Rev 3 - External Communications/Complaints ENV/OHP/010 - Area Noise Survey Environment Standard - Noise and Vibration Control	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:118			The Contractor shall ensure that OHSEC awareness and training for all employees includes the need to minimise noise.	Contract term /daily	Without exception	A1.12 - Induction A3.1 - Contractor Management EMSOPS013Rev1 - Identification of training	OHSEC course syllabus contained in approved method	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						needs and training methods	statement	
B:119		Protection of workers against the harmful affects of excessive noise	The Contractor shall provide suitable hearing protection to all of their staff and others entering areas with high noise levels. Zones of risk shall be clearly identified with warning signs.	Contract term /daily	Without exception	A1.8 - Safety Training Courses A3 - OH Standards - Workplace monitoring A1.19 - Personal Protective Equipment A1.13 - Permit to Work and Clearances System A1.10 - 28.5(b) Appointment of Responsible persons A3.1 - Contractor Management	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:120		Verification of adherence to specified requirements in terms of noise prevention and control	Noise monitoring shall occur at weekly intervals for health and safety within the works areas as well as for environmental purposes, near the demarcated site boundaries.	Contract term /weekly	In line with Rössing Uranium 's current Standard	A3 - OH Standards - Workplace monitoring A3.1 - Contractor ManagementB2 – OH Standards - Hearing conservationB10 - OH Standards - Occupational exposure limits EMSOPS001Rev 2 - Monitoring and Measurement EMSOPS002Rev 2 - Communication and Reporting EMSOPS004 Rev 3.0 - Environmental Record-keeping ProcedureEnvironment Standard - Noise and Vibration Control ENVOHP010 - Noise Survey	CEO reports and Contractor's submissions	Contractor
B:121	Lighting	Reduce the visual intrusion caused by excessive lighting	Lighting installed on the site does not interfere with road traffic or cause a reasonably avoidable disturbance to surrounding communities or other users of the area.	Contract term */ad hoc*	In the opinion of the CEO, REO and IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:122			Floodlighting or up-lighting of structures or large areas shall not be permitted.	Contract term */ad hoc*	Except with project manager's consent where up lighting may be required to ensure safety of	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
					specific tasks			
B:123			Lighting shall be limited to the minimum required to ensure that work can be undertaken safely in terms of the relevant health and safety legislation.	Contract term /daily	Minimum requirements of the applicable health and safety legislation	C4.1 - Ladders, Stairs, Platforms & Scaffolding A3 - OH Standards - Workplace monitoring	Physical verification and health and safety officers.	Contractor
B:124	Site demarcation and establishment of the Contractor's camp	Ensuring adequate planning is given to the layout and functioning of site establishment areas	The Contractor shall inform the Project Manager of the intended actions and programme for site establishment and of the proposed location of the construction camp/s and provide him with a plan showing the layout of the construction camp, including the positions of all facilities, stockpile and lay down areas, vehicle wash and service areas, fuel storage areas, batching areas and other infrastructure.	Contract commencement	Without exception and as per approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports and method statement	Contractor
B:125			The site layout shall be planned to facilitate ready access for deliveries, facilitate future works and to curtail any disturbance or security implications for neighbours, including Walvis Bay port operations. The final site layout shall be subject to the Project Manager's approval, which shall not be unreasonably withheld.	Contract commencement	Without exception and as per approved method statement	Environment Standard - Environmental Management System Environment Standard - Land-Use Stewardship	Physical verification and routine OHSEC monitoring and audit reports and method statement	Contractor
B:126		Site demarcation to limit the spatial extent over which the Contractor will have influence	The Construction camp shall occupy as small an area as possible.	Contract commencement	As per approved method statement	Environment Standard - Environmental Management System Environment Standard - Land-Use Stewardship	Physical verification and routine OHSEC monitoring and audit reports and method statement	Contractor
B:127			Site demarcation fences shall be installed before any construction activity will be allowed to commence.	Contract commencement	Without exception	A1.16 - Barricading and Demarcation C3.1 - Vehicles and Driving	Physical verification and routine OHSEC monitoring and audit	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
							reports	
B:128			The Contractor shall maintain in good order all demarcation fencing and barriers for the duration of construction activities, or as otherwise instructed by the Project Manager. This shall entail fencing of the construction site, within the port premises as well as fencing of construction camp areas.	Contract term	According to technical specifications and approved method statement	A1.16 - Barricading and Demarcation	Physical verification Physical verification and routine OHSEC monitoring and audit reports	Contractor
B:129			Unless otherwise agreed to by the Project Manager, the Contractor shall ensure that all activities are restricted to within the defined Working Area. The areas outside of the defined Working Area as well as any other areas identified by the Project Manager in the Specification shall be regarded as exclusion areas. Insofar as he/she has the authority, the Contractor shall ensure that no unauthorised entry, stockpiling, dumping or storage of equipment, plant or materials shall be allowed within the exclusion areas.	Contract term /daily	Without exception	A1.12 - Induction A1.16 - Barricading and Demarcation EMSOPS007 Rev 3 - External Communications/Complaints EMSOPS010Rev2 - Reporting and investigation of Environmental incidents EMSTEM001 - Environmental Management Programme ENVCLS005 - Environmental Clearance Environment Standard - Environmental Management System HSECOP003 Rev 2 - Environmental Management System Code of Practice A1.13 - Permit to Work and Clearances System	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:130			The Project Manager with the assistance of the REO may also identify sensitive or special features inside the Working Area as exclusion areas.	Contract commencement / *ad hoc*	As per approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	REO / Project Manager
B:131		Limit the OHSEC impact associated with the establishment of temporary services	Temporary services, including pipelines, power lines and telephone lines, shall be located in a manner which will cause the least disturbance to the environment. In particular, care shall be taken to ensure that the route alignment for temporary	Contract commencement / *ad hoc*	As per approved method statement	Project Requirement	Physical verification, approved method statement and routine OHSEC monitoring and audit	PM and Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
		to the Contractor's camp	services avoids identified sensitive areas. Where possible, the Contractor shall ensure that service infrastructure is accommodated within the same trench.				reports.	
B:132		Limit the OHSEC impact associated with the establishment of site structures in the Contractor's camp	All site structures shall be of a temporary nature and shall be removed at the end of the contract. All site establishment components (as well as equipment) shall be located to limit visual intrusion on neighbours and to limit the extent of the area disturbed.	Contract term / *ad hoc*	Limited disturbance of Contractor's camp site, as per approved method statement	A1.15 - Colour Coding C2.3 - Electrical Installations C2.4 - Labelling of Switches, Isolators and Valves Environment Standard - Environmental Management SystemEnvironment Standard - Land-Use Stewardship	Physical verification, approved method statement and routine OHSEC monitoring and audit reports.	Contractor and PM
B:133			The Contractor shall limit the number and extent of concrete slabs and other building foundations of temporary nature as far as practical.	Contract term /*ad hoc*	As per method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:134			The Contractor shall limit, as far as practical, the extent of earthworks required for the establishment of the camp area.	Contract term /daily / *ad hoc*	Limited disturbance in the opinion of the PM, CEO, REO and IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:135		Reducing health and safety and security risks associated with unauthorised access to the construction site	The Contractor shall ensure that access to the site and associated infrastructure and equipment is controlled throughout the construction period.	Contract term /daily / *ad hoc*	Without exception or incident	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports and public complaints register	Contractor
B:136			The Contractor shall implement the necessary gates, booms, access control points, guard houses to ensure access control and security of the site is maintained.	Contract term / daily/	Without exception or incident	A1.13 - Permit to Work and Clearances System A1.19 - Personal Protective Equipment A1.12 - Induction A3.1 - Contractor Management A1.16 - Barricading and Demarcation	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:137			No person shall be allowed into the construction areas without having undergone the necessary OHSEC induction or being escorted by a senior staff member from the Contractor's staff.	Contract term / daily	Without exception or incident	A1.13 - Permit to Work and Clearances System A1.19 - Personal Protective Equipment A1.12 - Induction A3.1 - Contractor Management A1.16 - Barricading and Demarcation	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:138			All authorised site personal shall carry an identification card issued by the Contractor, and all authorised vehicles, equipment and plant shall have an identification sticker.	Contract term / daily/	Without exception or incident	A1.13 - Permit to Work and Clearances System A1.19 - Personal Protective Equipment A1.12 - Induction A3.1 - Contractor Management A1.16 - Barricading and Demarcation	Physical verification as part of routine OHSEC monitoring and audit reports.	Contractor
B:139		Exercising control over the demolition of existing structures and the resulting waste	Clearing shall consist of the removal of all structures, scrap and all other material prohibiting the execution of the Works, including the disposal of all resultant materials, subject to the requirements of this Specification and the Project Manager. Any existing structures located within the Working Area shall only be damaged or demolished and removed with the prior approval of the Project Manager.	Contract commencement / *ad hoc*	Without exception or incident	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports. Project Manager's site instructions	Contractor
B:140		Limit the OHSEC impact associated with the establishment of temporary access roads	Only designated access roads shall be used to access the Working Area. The establishment of any additional roads will only be permitted with the approval of a method statement.	Contract term / *ad hoc*	Without exception or incident and according to the approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:141			Maintenance of access and haul roads within the demarcated site shall be routinely undertaken for the contract duration. The maintenance includes ensuring the provision of adequate drainage and dust control. Damage to the existing access roads outside the Construction camp because of construction activities shall be repaired to the satisfaction of the Project Manager, using material similar to that used	Contract term / daily / *ad hoc*	Without exception or incident. No public complaints	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			in the original construction of the infrastructure.					
B:142			Where new access roads are required, these shall be subject to prior approval of a method statement by the Project Management Team and shall be planned and constructed to ensure that as small an area as possible is disturbed (maximum width of 5 m, with splays where appropriate and required).	Contract term / *ad hoc*	Without exception or incident. As per approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports. Approved method statement	Contractor
B:143			Adequate provision shall be made for parking areas to accommodate vehicles and plant and inspections shall be undertaken regularly to prevent parking of plant or vehicles outside of these designated areas.	Contract commencement / *ad hoc*	Without exception or incident. As per approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:144			All temporary access roads, parking areas and turning-areas and staging platforms shall be returned to their original (i.e. pre-construction) condition at the end of the Contract, including ripping the disturbed area parallel with the contours to a depth of 300 mm and reshaping to match the surrounding topography.	Contract completion / *ad hoc*	Without exception or incident. Returned to original condition	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:145			All vehicle turning-areas shall be located within the Working Area and shall be subject to the prior approval of the Project Manager. The Contractor shall ensure that horse and trailer vehicles transporting plant and materials only turn within the designated turning-areas.	Contract term / daily	Without exception or incident. As per approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:146	Accommodation of Site Staff		With the exception of the night watchmen, none of the Contractors staff shall be accommodated on Site overnight.	Contract term / daily	Without exception or incident	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:147	Erosion and sedimentation control	Erosion and sedimentation control	Take all reasonable measures to limit erosion and sedimentation due to the construction activities and shall include in the design of the site works measures to prevent such occurrences. The Works shall be undertaken in a phased manner, and development staged so that stripped areas are kept to a minimum. The Contractor shall ensure that the stabilisation of cleared areas is actively managed in order to prevent and control erosion.	Contract term / daily / *ad hoc*	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:148			Erosion shall not be allowed to develop on a large scale before repairs are affected and all erosion damage shall be repaired as soon as it has been detected. In this regard, any runnels or erosion channels that develop during the construction shall immediately be backfilled and compacted and the areas restored to a proper stable condition.	Contract term / *ad hoc*	Without exception	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:149			The landscaping and rehabilitation of disturbed areas shall occur as soon as practically possible following the cessation of the work in a specific area. In this regard, the Contractor's Works Programme shall clearly indicate that the rehabilitation will immediately be executed, per phase, upon the completion of the works within a specific area. Traffic and movement over stabilised areas shall be restricted and controlled, and damage to stabilised area shall be repaired and maintained to the satisfaction of the Project Manager.	*Ad hoc*	Without exception	EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure ENV/ENG/WQM/002 - Water Quality Management Environment Standard - Environmental Management System Environment Standard - Land-Use Stewardship EMSOPS001Rev 2 - Monitoring and Measurement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:150			Topsoil and any other loose stockpiled material shall be stockpiled with consideration for the prevailing wind direction and, if required, additional windbreaks or other mechanisms to protect such material from dispersion by wind shall be instated at the request of the Project Manager.	Contract term / *ad hoc*	No visible dust leaving stockpiles	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:151	Stockpiling, storage and staging of inert construction materials	Minimise the potential negative OHSEC impacts arising from the stockpiling of various inert construction materials	All materials shall be stored within the demarcated construction camp or concrete batching areas. Where this is not feasible, the Project Manager will identify additional sites for stockpiling within the Working Area.	Contract term / daily/	Without exception or incident and as per approved method statement or PM site instruction	A1.12 - InductionA1.16 - Barricading and Demarcation ENVCLS005 - Environmental Clearance A1.10 - 28.5(b) Appointment of Responsible persons	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:152			Soil, sand and gravel stockpiles shall be convex in shape, shall be no higher than 2 m and shall be located so as to cause minimal disturbance. Stockpiles shall be so placed as to occupy the minimum width compatible with the natural angle of repose of the material, and measures shall be taken to prevent the material from being spread over too wide a surface.	Contract term / *ad hoc*	Without exception and in the opinion of the CEO , REO and IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:153			Stockpiled material shall be stockpiled with consideration for the prevailing wind directions and velocities and, if required, additional windbreaks or other mechanisms to protect such material from dispersion by wind shall be instated at the request of the Project Manager.	Contract term / ad hoc	Without exception and in the opinion of the CEO , REO and IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports. Dust monitoring data	Contractor
B:154			The limits of the stockpiling or staging areas are to be demarcated and regular inspection shall occur to ensure that materials are being contained within the allocated areas. The Contractor excises control over such areas and not allow delivery drivers dictate the stockpiling layout.	Contract term / ad hoc	Without exception and in the opinion of the CEO, REO and IEA. All vehicle delivery drivers to be issued with rules on entering the site and the actions to be supervised	A1.12 - Induction A1.16 - Barricading and Demarcation ENVCLS005 - Environmental Clearance A1.10 - 28.5(b) Appointment of Responsible persons; EMSOPS010Rev2 - Reporting and investigation of Environmental incidents	Physical verification and routine OHSEC monitoring and audit reports.	Contractor and CEO / REO / IEA
B:155			Stockpiles area shall be regularly inspected for appropriate housekeeping practices as well as associated health and safety aspects.	Contract term / weekly / ad hoc	Without exception and in the opinion of the CEO , REO and IEA	EMSTEM001 - Environmental Management Programme EMSOPS008 - Development and Review of Environmental Management Programme Environment Standard - Environmental	Physical verification and routine OHSEC monitoring and audit reports.	CEO / REO / IEA and relevant health and safety officers

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
						Management System		
B:156	Ablution facilities	Reduce health risks and environmental pollution arising from a concentration of human excreta in the environment	The contractor shall provide adequate ablution facilities, including a changing room with warm-water showers, for his staff in the construction camp. Mobile chemical toilets shall be provided at all other locations within the Working Area, as directed by the Project Manager. Acts of excretion and urination, other than at the facilities provided, are strictly prohibited.	Contract term / daily / *ad hoc*	Without exception and in the opinion of the CEO , REO and IEA	A3.1 - Contractor Management PWM/SPP/002 - Operation of Sewage Plant ENV/ENG/SPP/001 - Monitoring of Sewage Plants	Physical verification and routine OHSEC monitoring and audit reports.	Contractor and CEO / REO / IEA and relevant health and safety officers
B:157			The Contractor shall not install pit latrines or septic tanks for the ablution facilities at the Construction Camp. Where mobile chemical toilets are utilised, the Contractor shall ensure the following:	Contract term / daily / ad hoc	Without exception and in the opinion of the CEO , REO and IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor and CEO / REO / IEA and relevant health and safety officers
B:158			*Toilets shall be located within 100 m from any point of work but no closer than 50 m to any watercourse or water body;*			Project Requirement		
B:159			*Toilets shall be secured to the ground to prevent them from toppling due to wind or any other cause;*			Project Requirement		
B:160			*No spillage shall occur when the toilets are cleaned or emptied and the contents shall be properly stored and transported to the sewage treatment works;*			Project Requirement		
B:161			*Discharge of waste from toilets into the environment and burial of waste is strictly prohibited;*			Project Requirement		
B:162			*Toilets shall be provided with an external closing mechanism to prevent toilet paper from being blown out; and*			Project Requirement		
B:163			*Toilets shall be emptied before long weekends and builders' holidays, and shall be locked after working hours.*			Project Requirement		

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:164			All ablution facilities are to be serviced regularly and kept in a clean and hygienic fashion.	Contract term / daily / ad hoc	Without exception and in the opinion of the CEO , REO, IEA and Health and safety officer	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor and CEO / REO / IEA and relevant health and safety officers
B:165		Verification of adherence to specified requirements	All ablution facilities are to be inspected on a regular basis to ensure the above requirements are being met.	Contract term / daily / ad hoc	In a satisfactory state in the opinion of the CEO , REO IEA and Health and safety officer	A3.1 - Contractor Management PWM/SPP/002 - Operation of Sewage Plant ENV/ENG/SPP/001 - Monitoring of Sewage Plants	Physical verification and routine OHSEC monitoring and audit reports.	Contractor and CEO / REO / IEA and relevant health and safety officers
B:166	Eating or recess areas	Reduce littering, health risks associated with contamination of foodstuff, ecological implications associated with food spillage, preventing the dispersion of workers during recesses	The Contractor shall erect designated eating or recess areas for his staff close to the major works areas, to be agreed with the Project manger.	Contract commencement	As per approved method statement	A3.1 - Contractor Management	Physical verification and as per the approved method statement	Contractor
B:167			Eating or recess areas shall be constructed and equipped to meet the following requirements:	Contract commencement / Contract term / daily / ad hoc	In a satisfactory state in the opinion of the CEO , REO IEA and Health and safety officer	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor and CEO / REO / IEA and relevant health and safety officers
B:168			*Recess areas are to be sufficiently sized to comfortably accommodate the maximum number of staff working within the given working area;*			Project Requirement		
B:169			*Eating or recess areas shall be situated as close to the respective working areas whilst being sufficiently offset or positioned to offer occupants protection from construction noise and dust;*			Project Requirement		
B:170			*Tables and seating with adequate care for ergonomic design must be provided;*			Project Requirement		
B:171			*The eating area is to be completely shaded and the protected from prevailing winds;*			Project Requirement		
B:172			*A sufficient volume of potable water and soap shall be stationed at the eating area to allow for washing of hands and drinking;*			Project Requirement		
B:173			*Drinking water shall be maintained at a suitable temperature for consumption;*			ENVINS010Rev.1 - Heat Stress		
B:174			*Ablution facilities shall be located within 50m of the*			Project Requirement		

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			recess area but not closer than 15m					
B:175			*Recess areas shall have a staff information board, providing pertinent information, awareness materials and information posters;*			Project Requirement		
B:176			*The eating area shall be fitted with a fire extinguisher*			Project Requirement		
B:177			*Recess areas shall make provisions for a smoking area. Smoking will not be permitted anywhere else on the site; and*			Project Requirement		
B:178			*Recess areas shall receive daily maintenance and cleaning, All rubbish bins are to be emptied daily to the central waste storage area.*			Project Requirement		
B:179			Any cooking on Site shall be done on well-maintained gas cookers with fire extinguishers present. No cooking shall be permitted to occur on open fires.			Project Requirement		
B:180		Verification of adherence to specified requirements	All eating areas are to be inspected routinely to ensure that the specified requirements are being met.	Contract term / daily / ad hoc	In a satisfactory state in the opinion of the CEO , REO IEA and Health and safety officer	HSECOP003 Rev 2 - Environmental Management System Code of Practice	Physical verification and routine OHSEC monitoring and audit reports.	CEO / REO / IEA
B:181	Water Use	Reduce the volume of water needed for construction purposes	Water is a scarce resource in Namibia and shall be conserved wherever possible. The Contractor shall minimise the use of water and shall immediately attend to any wastage. The Contractor shall be required to adhere to Rössing Uranium's water management strategies.	Contract term / daily / ad hoc	Satisfactory in the opinion of the CEO , REO and IEA	ENV/ENG/WQM/001 - Water Quality Monitoring ENV/ENG/WQM/002 - Water Quality Management ENV/ENG/WSM/002 - Water Recycling and Re-use ENV/WSM/003 - Procedure for Reporting Contractors Water Consumption Environment Standard - Water Use and Quality Control EMSOPS001 - Monitoring and Measurement EMSOPS002Rev 2 - Communication and Reporting	Physical verification and routine OHSEC monitoring and audit reports. Water usage stats as part of Contractor's submissions	Contractor
B:182		Ensure that	Subject to the prior approval of the Project Manager,	Contract term / ad	Without exception or	ENV/WSM/003 - Procedure for Reporting	Physical verification	Contractor and

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
		appropriate water quality is sourced for the respective use	water for construction purposes may be supplied via the existing sources used by Rössing Uranium Acid Tank Farm in the port. The Contractor shall liaise with Project Manager regarding his water use requirements and shall ensure that water quality is appropriate for the use for which it is intended. The Contractor shall be responsible for obtaining the necessary authority and approvals prior to undertaking any such use. The Contractor shall absolve the Employer of any and all legal obligation and risk in this regard.	hoc	incident	Contractors Water Consumption	and routine OHSEC monitoring and audit reports.	Project Manager / Employer
B:183		Monitoring of water use during construction	Contractor shall install the necessary water metering devices on all incoming water delivery pipelines and calculate water tanker usage and submit the volumes of water utilised for each week.	Contract term / daily / ad hoc	In a satisfactory state in the opinion of the CEO , REO IEA and Health and safety officer	ENV/WSM/003 - Procedure for Reporting Contractors Water Consumption EMSOPS001 - Monitoring and Measurement EMSOPS002Rev 2 - Communication and Reporting	Physical verification and routine OHSEC monitoring and audit reports. Water usage stats as part of Contractor's submissions	Contractor and CEO
B:184	Solid Waste Management	Ensure the appropriate handling and storage and disposal of waste and reducing the likelihood of environmental pollution	The management of solid waste on site shall be strictly controlled and monitored. The quantities of waste generated on site shall be minimised. Littering shall be avoided.	Contract term / daily	Without exception or incident	EMSOPS001Rev 2 - Monitoring and Measurement EMSOPS002Rev 2 - Communication and Reporting EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure	Physical verification and routine OHSEC monitoring and audit reports.	CEO / REO / IEA
B:185			The Contractor shall provide sufficient weatherproof and scavenger-proof bins on Site to store the solid waste produced on a daily basis. Solid, non-hazardous waste shall be disposed of in the bins provided and no on-site burying, dumping or burning of any waste materials, vegetation, litter or refuse shall occur. Bins shall not be allowed to become overfull and shall be emptied a minimum of twice weekly. The waste may be temporarily stored on the	Contract term / daily	Without exception or incident	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			Site in a central waste area that is weatherproof and scavenger-proof, and which the Project manager has approved.					
B:186			All non-hazardous solid waste shall be disposed of at the Harzardous waste cell at the Walvis Bay Landfill or at the approved Rössing Uranium landfill site. The Contractor shall supply the Project Manger with a certificate of disposal.	Contract term / daily	Without exception or incident	ENVWMP009 - Transport of contaminated items Environment Standard - Hazardous Material and Contamination Control B4 - OH Standards - Hazardous substances	Physical verification and routine OHSEC monitoring and audit reports. Waste disposal certificates	Contractor
B:187	Contaminated water management	Reducing the likelihood of environmental pollution arising from the release of contaminated water	Pollution could result from the release, accidental or otherwise, of contaminated runoff from construction camps and batching areas, discharge of contaminated water, chemicals, paints, solvents, oils, fuels, sewage, runoff from stockpiles, solid waste, litter, etc. Accordingly, the Contractor shall establish a contaminated water management system to address the prevention of pollution as well as suitable methods for the disposal of contaminated water.	Contract term / daily	Without exception or incident and as per approved method statement	Project requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:188			Appropriate pollution control facilities necessary to prevent discharge of water containing polluting matter or visible suspended materials into surrounding areas shall be designed and implemented.	*Ad hoc*	Without incident	Environment Standard - Hazardous Material and Contamination Control Environment Standard - Water Use and Quality Control	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:189			Runoff from the cement/ concrete batching areas shall be strictly controlled, and contaminated water shall be collected, stored and either treated or disposed of off-site, at the Walvis Bay hazardous landfill site or other location approved by the Project Manager.	Contract term / daily	Without exception or incident as per approved method statement	Environment Standard - Hazardous Material and Contamination Control Environment Standard - Water Use and Quality Control	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:190			Runoff from vehicle wash bays, workshops and diesel/ fuel tank areas shall pass through oil traps. The oil sludge thus collected shall be disposed of at the Walvis Bay hazardous landfill site or other approved waste disposal site, i.e. licensed for such material.	Contract term	Without exception or incident	Environment Standard - Hazardous Material and Contamination Control Environment Standard - Water Use and Quality Control	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:191			All spillage of oil onto concrete surfaces shall be controlled by the use of an approved absorbent material.	Contract term / daily / ad hoc	Without exception or incident	Environment Standard - Hazardous Material and Contamination Control Environment Standard - Water Use and Quality Control Environment Standard - Non-Mineral Waste Management B4 - OH Standards - Hazardous substances	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:192			The Contractor shall notify the Project Manager immediately of any pollution incidents on Site. Verbal reports must be followed up by a written report, which shall be submitted within 24 hours of the incident. Rössing Uranium shall in tern notify neighbouring port operations if any risk exists to their materials or operations	Contract term / ad hoc	Without exception.	A3.1 - Contractor Management	Physical verification and routine OHSEC monitoring and audit reports. Verify Incident reports	Contractor / CEO
B:193	Earthworks	Minimise the potential negative OHSEC impacts associated with earthworks operations	Major earthworks operations and operations outside the demarcated site shall be subject to approval by method statement.	Contract term / daily	Without exception or incident and as per the approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:194			The Contractor shall ensure that the dust and noise control measures as specified are implemented during earthworks operations.	Contract term / daily / ad hoc	Without exception or incident	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports. Dust and noise data as part of Contractor's submissions	Contractor / CEO
B:195			Trenching shall be undertaken in accordance with the engineering specifications with the following OHSEC amplifications, where applicable:	Contract term / ad hoc	Without exception or incident	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports and health and safety inspection reports	Contractor / CEO / REO / IEA and Health and safety Officers
B:196			*Soil excavated shall be immediately used for refilling trenches i.e. soil from the first trench section shall be excavated and stockpiled, thereafter soil from the second excavated trench length shall be used to backfill the trench behind it once the infrastructure*			Project Requirement		

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			has been laid. The last trench shall be filled using the soil stockpiled from the first trench section;					
B:197			*Trench lengths shall be kept as short as practically possible before backfilling and compacting;*			Project Requirement		
B:198			*Trenches shall be re-filled to the same level as (or slightly higher to allow for settlement) the surrounding land surface to minimise erosion; and*			Project Requirement		
B:199			*All open trenches shall be clearly and adequately demarcated to prevent accidents involving persons or equipment.*			A1.16 - Barricading and Demarcation A1.19 - Personal Protective Equipment C4 - Working at Heights C4.1 - Ladders, Stairs, Platforms & Scaffolding C4.2 - Fall Protection Equipment C5.1 - Confined Spaces C6 - Cranes and Lifting 2006 REV0		
B:200		Minimise the extent of earthworks	The extent of the disturbance resulting from earthworks shall be minimised to that required for the execution of the works.	Contract term / ad hoc	In the opinion of the PM / REO / CEO / IEA in comparison with the technical drawings and specifications	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:201			The extent of cut and fill operations or other excavations required for the establishment of the temporary works shall be kept to the minimum through careful placement of temporary structures.	Contract term / ad hoc	In the opinion of the PM / REO / CEO / IEA and as per the relevant approved method statement	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:202		Ensuring stability of excavations	Excavation at all the sites shall be carried out in such a way that slopes are not made dangerously steep. In general excavated slopes should be no steeper than 1:3 (approximately 18 degrees), but where this is unavoidable appropriate measures shall be undertaken to stabilise the slopes. No materials, equipment or other load shall be placed so close to	Contract term / ad hoc	Satisfactory in the opinion of the PM / REO / CEO / IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			any excavation that the stability of the sides of the excavation is endangered.					
B:203			Contractor's Health and Safety Officer / representative required to inspect excavation for stability.	Contract term / weekly or after a slide or rain	Stability confirmed	A1.7 - Risk Assessment A2 - OH Standards - Risk management A3.1 - Contractor Management	Health and safety inspection sheets, physical verification and routine OHSEC monitoring and audit reports.	Contractor's Health and Safety Officer
B:204		Appropriate handling, stockpiling and disposal of spoil (inert material unsuitable for other construction uses)	Surplus or unsuitable material obtained from any excavations as well as rubble not required elsewhere in the Works shall be disposed of at designated sites. Before disposal of any such material the Contractor shall liaise with the Project Manager to ascertain where such disposal shall occur depending of the nature and amount of material, or if Rössing Uranium could make use of the material elsewhere in the mine operations.	Contract term / ad hoc	Satisfactory in the opinion of the PM / REO / CEO / IEA	MINOPS001 - Waste rock dump planning and design Environment Standard - Mineral Waste Management	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:205			In operating the spoil sites, the Contractor shall ensure that:	Contract term / daily / ad hoc	Without exception or incident and satisfactory in the opinion of the PM / REO / CEO / IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:206			*The spoil disposed of in the spoil sites is free of contaminated or hazardous materials; and*			Project Requirement		
B:207			*The spoiling of material shall be undertaken in accordance with Rössing Uranium's requirements.*			MINOPS001 - Waste rock dump planning and design Environment Standard - Mineral Waste Management		
B:208	Demobilisation, rehabilitation and Landscaping	General management objective is to ensure disturbed areas are returned to pre-construction conditions	All areas disturbed as a result of the construction activities, irrespective of whether they occur within the defined Working Area or not, shall be subject to the requirements outlined in this SEMP. This includes, but is not limited to, Construction Camps, all stockpiling and lay down areas, the batching plants, all temporary access routes and all other areas from which topsoil has been stripped.	Contract term / Contract completion	Satisfactory in the opinion of the PM / REO / CEO / IEA , the approved method statement and the specifications	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

ID:	Aspect	Management Objective	Management Action	Action Frequency	Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
B:209		Demolition and removal of structures	Prior to landscaping, the Contractor shall demolish and remove from Site everything not forming part of the Permanent Works. This includes, but is not limited to, temporary services and facilities (including foundations), temporary fences, temporary access routes, protective works, equipment, materials (nuts, bolts, washers, wire, wood, bricks, cement *etc.*) and settlement ponds. All material generated from the demolition and removal of structures from site shall be appropriately disposed of.	Contract completion	Satisfactory in the opinion of the PM / REO / CEO / IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:210		Landscape reshaping	All slopes which do not form part of the Permanent Works shall be graded so that no slope exceeds a maximum gradient of 1:3 or as otherwise directed by the Project Manager. Contour drains shall be provided to control erosion where required by the Project Manager.	Contract term / ad hoc	Satisfactory in the opinion of the PM / REO / CEO / IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:211			Excavation and fills for Temporary Works and spoil dumps shall be formed in such a manner that the final profile shall appear as a natural extension to the adjacent ground profiles.	Contract term / ad hoc	Satisfactory in the opinion of the PM / REO / CEO / IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor
B:212		Traffic on rehabilitated areas	The Contractor shall not undertake the landscaping of any areas until all operations that may require construction material and equipment to pass over those areas has been completed. All landscaped shall be regarded as exclusion areas and no equipment, other than that required for establishment and maintenance purposes, shall be allowed to operate in these areas.	*Ad hoc*	Satisfactory in the opinion of the PM / REO / CEO / IEA	Project Requirement	Physical verification and routine OHSEC monitoring and audit reports.	Contractor

OPERATIONAL PHASE

This section of the SEMP deals with OHSEC management aspects associated with the operational phase of the sulphur handling facility. It aims to establish an effective compliance monitoring structure to be integrated into Rössing Uranium's Health, Safety, Environment and Quality (HSEQ) management system, which is certified against the ISO:9001, ISO:14001 and ISO:18001 management systems. The objective is to measure, record and demonstrate ongoing compliance with relevant legislation and Rössing Uranium company policies regarding OHSEC management through implementation of the specified OHSEC mitigation measures.

ORGANISATIONAL FRAMEWORK

The SEMP aims to present the key management strategies in a manner that allows for implementation and further development. Rössing Uranium has an HSEQ management system in place, which is certified against the ISO:14001 Environmental Management System (EMS) amongst others[6]. It is recommended that the management strategies identified hereunder be integrated into the existing EMS component of the HSEQ management system. In terms of the HSEQ structure, this SEMP would assist in the identification of the key environmental aspects and will serve to guide Rössing Uranium in the continued formulation of a suite of suitable Standard Operating Procedures and in attaining the continual improvement objective.

Due to the scale and complexity of Rössing Uranium's operations, the use of a formalised HSEQ is essential in allowing the company to optimise, coordinate and manage the various operations, personnel, plant and equipment, and their interactions, in a manner that demonstrates consistent application of environmental best practice. Rössing Uranium can thereby efficiently detect and minimise the potential impact of its activities on the environment. A brief overview of the elements of an ISO: 14 001 EMS, as entrenched in the HSEQ, is now provided.

An ISO:14 001 EMS aims to develop a systematic management approach to the management of environmental controls of the organisation. One of the key principles of this approach is the idea that continual improvement in the organisation's environmental management can be achieved and demonstrated.

Commencing with an environmental policy, then identifying the environmental concerns of the firm (referred to as aspects) and defining what measures can be implemented to control or mitigate these (through setting objectives and Targets), planning is accomplished. An organisational structure, and system of personnel responsibilities, competency and training, are then developed and implementation begins. Communication lines, documentation control and procedural documents, operational control and emergency preparedness define the operational portion of the program. These items are usually included in an EMS Manual, which is used to document a program so as to accomplish the Objectives and Targets established at the outset. The organisation's methods for measuring and monitoring its environmental impacts are also included in the manual, along with practices for identifying non-conformances and for implementing corrective and preventive actions. This monitoring, along with routine systems audits and record keeping, constitute the EMS checking and corrective action program. The final stage in the

[6] Although it is acknowledged that the HSEQ management system is certified against the ISO:9001 and ISO:18001 management systems as well, the focus here is on environmental management, hence on the ISO:14001 system elements.

program is a routine management review of its activities, and improvements to the system based on the performance observed during the previous cycle are brought into effect.

Figure 4: **Sequencing and structure of an ISO 14001 EMS**

depicts the sequencing of the implementation of an EMS as well as the structure of a typical EMS.

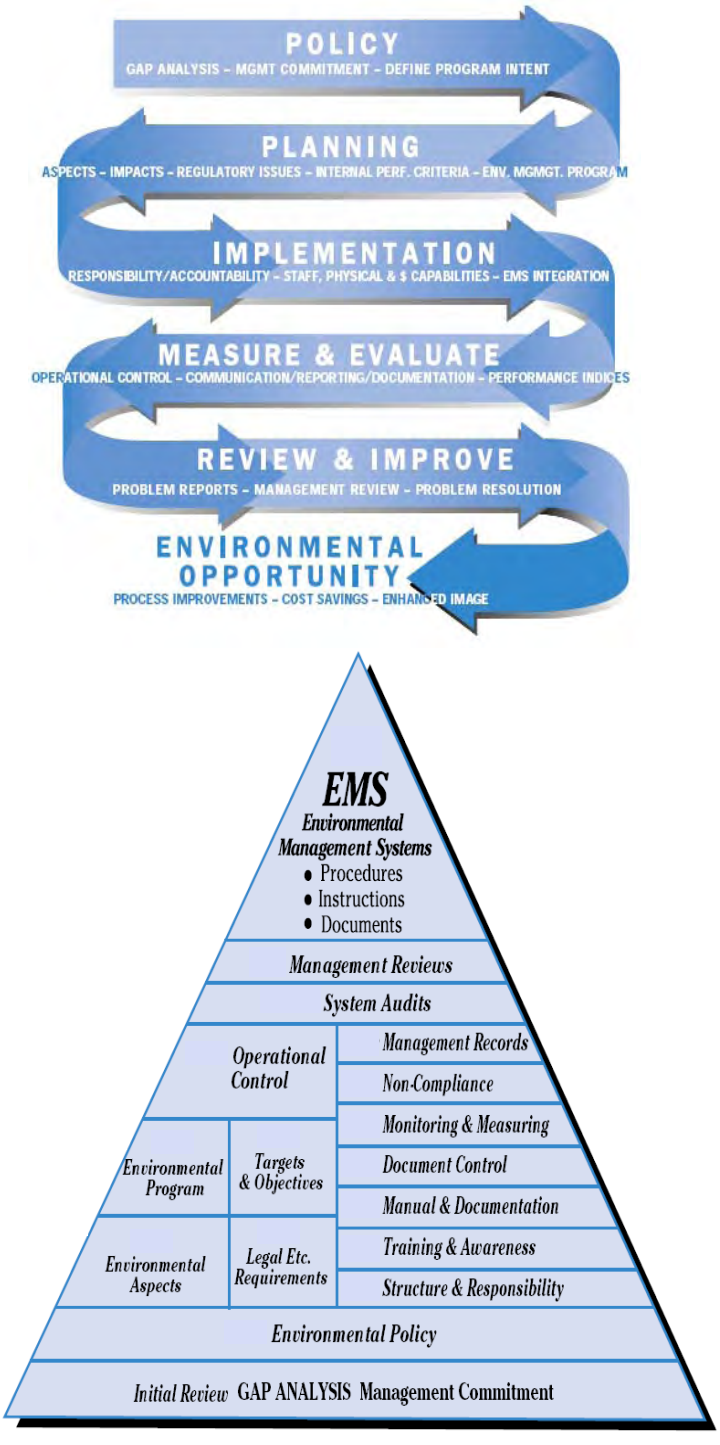

Figure 4: Sequencing and structure of an ISO 14001 EMS[7]

[7] Source: Modified from NCEDR. 1998

THE OPERATIONAL SEMP AND RÖSSING URANIUM'S HSEQ

This section is largely informed by Rössing Uranium's Environmental Management System Code of Practice (Revision No. 8.1: November 2008).

It is recommended that Rössing Uranium's HSEQ management system be extended and upgraded to include the various components forming part of the of the proposed expansion project, including the sulphur handling facility operations in the Port of Walvis Bay. The mitigation measures proposed in this SEMP are binding and should be carried forward into Rössing Uranium's HSEQ management system to inform procedures regarding potential future sulphur handling operations in general. The recommendations put forward in this operational phase SEMP should be utilised, together with the Hazard and Operability (HAZOP) Risk Register, and standard operating procedures already in place as an informant to the development of operating procedures for sulphur handling operations. The SEMP can assist in the identification of aspects and the development of procedures and operational controls normally undertaken as part of the planning phase. Figure 5 depicts the current HSEQ management system in place at Rössing Uranium. Key impacts (aspects) and mitigation measures identified in the SEMP can be fed into this system, to accelerate the development of HSEQ management system procedures.

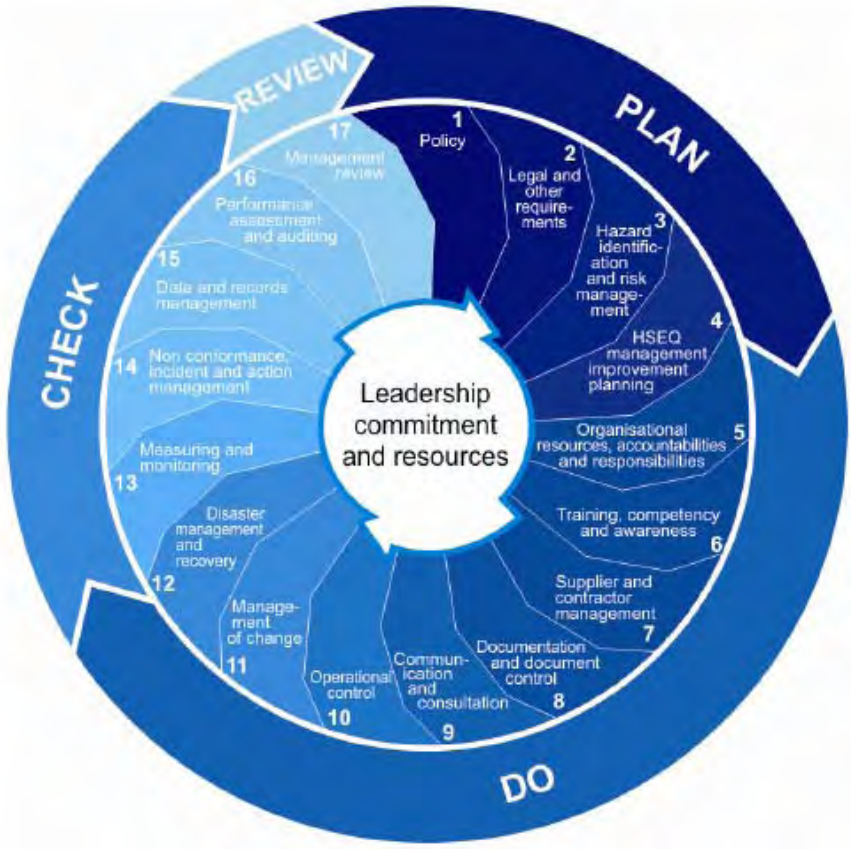

Figure 5: Overview of the HSEQ management system in effect at Rössing Uranium[8]

RÖSSING URANIUM'S HSE POLICY

The Rössing Uranium HSE Policy is the overarching and guiding document that informs the manner in which the company conducts its business activities and manages impacts on the environment, the health and safety of its employees and on the public at large. Rössing Uranium's HSE Policy is attached hereto as Appendix A.

[8] Source: Rössing. HSE Management System Code of Practice. 2008

RÖSSING URANIUM'S HSE HAZARDS / ASPECTS REGISTER

Each area or activity is inspected to identify potential risks to social or natural environment. The hazards or aspects are then listed in a register and is ranked or prioritised according to the potential significance of the resulting impact. Where a hazard /aspect is rated as being of high or critical priority, a HSE Management Improvement Plan is set, which sets out an action plan for the management of certain hazards / aspects and clearly defines the roles and responsibilities, task deadlines and monitoring and reporting requirements. Medium and serious priority hazards / aspects are subject to ongoing monitoring programmes to ensure continued effective management.

KEY STAGES IN THE HSEQ MANAGEMENT SYSTEM

The information contained in the Risk Register and that contained in the SEMP, will assist in the operational review process, as they forego the need to undertake the initial stages of the HSEQ management system, namely, the identification of environmental aspects. The mitigation measures and recommendations proposed in the SEMP should be carried through into the Risk Register, which can be used to inform the development of objectives and targets as well as offer direction in the formulation of the Environmental Management Programmes and Operational Controls for sulphur handling operations.

A HSE Improvement Plan is the all-important product of the HSEQ management system and is vital in ensuring that the management strategies are implemented and that the effectiveness of such strategies is monitored. For each priority environmental aspect, a series of mitigation actions and an implementation programme are identified by the Environmental Coordinator, in certain cases with the assistance of the line manager, HSE Management specialists or specialist consultants. Progress and shortcomings in the implementation of the various Improvement Plans are reported on by the Environmental Coordinator during routine HSE meetings.

COMPETENCE, TRAINING AND AWARENESS

All employees and contract workers under Rössing Uranium's employment should possess the necessary knowledge and competence to carry out their delegated tasks in compliance with Rössing Uranium's HSEQ management system, especially those appointed to tasks that have the potential to cause significant environmental damage. Both Environmental Co-ordinators and the Health and Environment (H&E) officers should identify training requirements for the various departments and work areas and undertake training of employees and contract workers in the respective areas. A generic HSE Induction Training Course is delivered to all new employees, which deals with overarching health, safety and environmental issues on the Rössing Uranium premises. Task-specific training can take place in the various departments and sections on an *ad hoc* basis. Records of all training courses are be kept on the HSEQ management system register.

COMMUNICATION AND REPORTING

To ensure that all levels of management are kept abreast of the performance in terms of the HSEQ management system, it is recommended that reporting occurs in a frequent and formalised fashion. The existing HSEQ management system reporting structure is adequate and should be expanded to incorporate the sulphur handling operations. Rössing Uranium should ensure that sufficient capacity exists within the HSE sections to ensure that the various roles and responsibilities of the respective sections can be fulfilled.

The H&E Officer is responsible for the collection and recording of data, which is collated into a weekly report and submitted to the relevant Environmental Coordinator. The collected data in the weekly reports is then collated by the Environmental Co-ordinators into a monthly HSE report which is interrogated and interpreted by the Environmental Management and Health Management sections and collated into a single HSE month-end report. This report is distributed to the Superintendent: Environmental Management, who is required to review and verify the content and quality of the environmental reporting. The Superintendent: Environmental Management, when satisfied, then approves the report and

distributes it to all the Departmental Managers. The HSE Manager is responsible for generating an annual environmental report which is a key informant in the annual review of environmental policies and strategies.

The HSE Manager is responsible for compiling data on the environmental performance of Rössing Uranium for the corporate report, which is reviewed by the Managing Director before being forwarded to Rio Tinto. The HSE Manager is also responsible for facilitating communication between the various levels and functions of the Rössing Uranium organisation in response to customer, investor, stakeholder and authority requirements. The Environmental Management section is responsible for ongoing formal and internal communications with the various regulatory agencies regarding environmental matters and Rössing Uranium operations.

Effective communication and reporting on environmental monitoring data and performance is key to the management of environmental aspects of concern and central to the HSEQ management system objective of continual improvement.

All new reporting resulting from the sulphur handling operations shall be subject to the document control procedures in effect at Rössing Uranium. All new HSEQ management system operational procedures, environmental data, audit reports and Standard Operating Procedures resulting from the sulphur handling operation must be effectively captured, distributed and controlled in terms of the HSEQ management system by the Environmental Management Section.

OPERATIONAL CONTROLS

Operational controls are essential for the management of specific activities that may impact on the environment. The Environmental Management section is responsible for the generation of procedural documents for specific operations and activities where environmental management and mitigation measures are a priority. The Environmental Management section is responsible for monitoring performance against the operational procedures and reporting on non-conformances during the monthly HSE meetings. Departmental Managers are responsible for the rectification of any such non-conformances and the implementation of any corrective actions defined by the Environmental Coordinator. Contractors are required to abide by Rössing Uranium's HSE operational controls and procedures, as well as the rectification of any non-conformances and implementation of any corrective actions deemed necessary by the Environmental Management section.

ORGANISATIONAL FRAMEWORK

The various appointments and their associated roles and responsibilities identified as being central to the adoption and implementation of this SEMP are discussed under the respective headings to follow and are derived from Rössing Uranium's existing HSEQ management system.

Managing Director

The Managing Director is accountable to the Board for all environmental matters and is the custodian of the HSE Policy.

General Managers

General Managers are responsible for ensuring that the HSE Policy is implemented and are responsible to the Managing Director for ensuring that the necessary reporting procedures and structures are in place and that the annual environmental targets are met.

HSE Manager

The HSE Manager is the custodian of the HSEQ management system and is responsible for the implementation of the strategic aspects of the HSEQ management system. The strategic portion of the HSEQ management system determines the overall direction, priority, timeframe and resources allocated to Environmental Management at Rössing Uranium. The HSE Manager reports directly to the General Manager: Operations.

The HSE Manager is responsible for establishing procedures for internal communication on environmental issues between the various levels and functions within the organisation. The HSE Manager is also responsible for the procedures for external communications on environmental issues whereby customer/investor/stakeholder requirements, changes in legislation, changes in business objectives etc. are recognised, internalised and transformed into changes in the operations. The HSE Manager is thus responsible for ensuring that the current interface between Rössing Uranium, its stakeholders, shareholders, Interested and Affected Parties (I&APs) and the authorities incorporates environmental issues and that relevant issues identified are communicated to the organisation.

The implementation of the operational HSEQ management system in each department is the responsibility of the individual departmental managers. They do, however, work according to the guidelines (or environmental programme) maintained by the HSE Manager.

Departmental Manager

The Departmental Manager of each department is responsible for the implementation of the HSEQ management system within the department, including the allocation of resources in the form of training and awareness, finance and operational control e.g. corrective actions and continual improvement.

HSE Superintendent

The HSE Superintendent is the appointed management representative of the HSEQ management system at Rössing Uranium.

The HSE Superintendent is responsible for the overall implementation of the HSEQ management system at Rössing Uranium and it is this person's responsibility to coordinate implementation efforts throughout all departments. The HSE Superintendent liaises closely with the departmental managers, superintendents and the Environmental Co-ordinators in order to ensure that the programme is correctly managed and maintained. The Superintendent: Health Management facilitates and co-ordinates specialist environmental projects, should such be required.

The HSE Superintendent is also responsible for reporting on the performance of the HSEQ management system to top management for review.

Line Superintendent

The Line Superintendent is responsible for all environmental aspects as a line function and is tasked with ensuring that the objectives and targets as stipulated for each environmental aspect in his/her area are met. The Line Superintendent should therefore ensure that all target dates stipulated in an Environmental Management Programme are met.

Environmental Coordinator

The Environmental Coordinator assists the Departmental Manager and Superintendents with the implementation of the HSEQ management system in their respective work areas. The Environmental Coordinator facilitates:

- Internal communication on environmental issues on a departmental level between the various levels and functions within the department;
- Collation and interpretation of monitoring results based on the objectives and targets identified for each environmental aspect;
- Setting up and the updating of Environmental Management Programmes, through the annual HSEQ management system reviews; and
- Identification of training requirements.

The Environmental Coordinator ensures that the operational HSEQ management system is aligned with the Environmental Management Programme for Rössing Uranium and fulfils a facilitation, communication and monitoring function.

H&E Officer

An H&E Officer is responsible for the monitoring of those aspects within the department that are stipulated in the monitoring programme.

Operational Phase Ohsec Mitigation Table

The OHSEC Mitigation Table included herewith is aimed at facilitating effective OHSEC mitigation implementation during the operational phase, as well as monitoring and auditing thereof. To assist with the cross-referencing between OHSEC mitigation prescribed and existing Rössing Uranium ISO EMS procedures, a full list of these OHSEC procedures (as provided by Rössing Uranium) that may be applicable, has been included as Appendix B, although relevant references are provided in the Rössing Uranium EMS_Reference column of the OHSEC Mitigation Table. This list and column references are not necessarily exhaustive and could require updating by Rössing Uranium.

Table 5: Operational Phase OHSEC Mitigation Table

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
C:01	Environmental best practice	Ensuring that mitigation measures and recommendations from SEIA are carried into the operations	Management strategies identified hereunder be carried forward through the HAZOP risk identification process and integrated into the EMS component of the HSEQ management system	Pre-commencement	ISO14001		Verify paperwork	Rössing Uranium
C:02			ISO:EMS Standard Operating Procedures to be developed, through this, duties and management actions assigned	Pre-commencement and amended as required	ISO14001			Rössing Uranium
C:03			Rössing Uranium should ensure that sufficient capacity exists within the OHS&E sections to ensure that the various roles and responsibilities of the respective sections can be fulfilled and that the sulphur handling operations in the Port are not neglected due to remoteness from the mine.	Pre-commencement	All health, safety and environmental systems are being effectively implemented		ISO Audits	Rössing Uranium
C:04	Worker competence, awareness and training	Ensure all employees and contract workers under Rössing Uranium's employment have the necessary knowledge and competence to carry out their delegated tasks in compliance with Rössing Uranium's EMS, especially those appointed to tasks that have the potential to cause significant environmental damage	Both Environmental Coordinators and the OHS&E officers should identify training requirements for the various departments and work areas and undertake training of employees and contract workers in the respective areas	*Ad hoc,* dedicated OHSEC topics to be presented at least once a month at toolbox talks	OHSEC topic to be presented at least once a month		Training register	Rössing Uranium Environmental Coordinators and OHS&E Officers
C:05			A generic OHS&E Induction Training Course should be delivered to all new employees, which can deal with overarching OHSEC issues at Rössing Uranium	At commencement, thereafter all new appointments and visitors	All staff to attend within first month of employment		Training register	Rössing Uranium
C:06			Task-specific training should take place on an *ad hoc* basis	*Ad hoc,* dedicated OHSEC topics to be presented at least once a month	OHSEC topic to be presented at least once a week		Training register	Rössing Uranium
C:07			Records of all training courses should be kept on the EMS register, including topics presented at toolbox talks	EMS training resister to be current	Without exception		Training register	Rössing Uranium Environmental Coordinators and OHS&E

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
								Officers
C:08	Communication and reporting	To ensure that all levels of management are kept abreast of the performance in terms of the EMS, reporting must occur frequently and in a formalised fashion. Effective communication and reporting on environmental monitoring data and performance is key to the effective management of environmental aspects of concern and central to the EMS objective of continual improvement.	H&E Officer is responsible for the collection and recording of data, which is collated into a weekly report and submitted to the relevant Environmental Coordinator	Weekly	Without exception		Verify paperwork	H&E Officer
C:09			The collected data in the weekly reports is then collated by the Environmental Coordinators into a monthly OH&E report which is interrogated and interpreted by the Environmental Management and Health Management sections	Monthly	Without exception		Verify paperwork	Environmental coordinator/s
C:10			These reports are used to compile a single OHS&E and Risk Management month-end report. This report is distributed to the Superintendent: Environmental Management, who is required to review and verify the content and quality of the environmental reporting	Monthly	Without exception		Verify paperwork	Superintendent: Environmental Management
C:11			The Manager: OHS&E and Risk Management is responsible for generating an annual environmental report which is a key informant in the annual review of the company's environmental policies and strategies	Annual	Without exception		Verify paperwork	Manager: OHS&E and Risk Management
C:12			The Manager: OHS&E and Risk Management is responsible for compiling data on the environmental performance of Rössing Uranium for the corporate report, which is reviewed by the Managing Director before being forwarded to Rio Tinto	Annual	Without exception		Verify paperwork	Manager: OHS&E and Risk Management
C:13			The Manager: OHS&E and Risk Management is also responsible for facilitating communication between the various levels and functions of the organisation in response to customer, investor, stakeholder and authority requirements	*Ad hoc*	Continued satisfaction of authorities, customers, investors and stakeholders		No incidents / complaints to contrary	Manager: OHS&E and Risk Management
C:14			The Environmental Management section is responsible for all ongoing formal and internal communications with the various regulatory agencies regarding environmental matters and operations	*Ad hoc*	Continued satisfaction of authorities and the various Rössing Uranium departments		Continued satisfactory performance of Rössing Uranium operations in terms of OHSEC aspects	Manager: OHS&E and Risk Management
C:15			All new reporting resulting from the sulphur handling operations in the port shall be subject to the document control procedures in effect at Rössing Uranium. The document control procedures must be reviewed to ensure that provision is made for the incorporation of the expansion projects into the EMS	*Ad hoc*	Without exception		Verify paperwork	Manager: OHS&E and Risk Management and subordinates (Document controller)

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
C:16			All new EMS operational procedures, environmental data, audit reports and Standard Operating Procedures resulting from the commissioning of the sulphur handling operations in the port must be effectively captured, distributed and controlled in terms of the EMS by the Environmental Management Section	*Ad hoc*	Without exception		Verify paperwork	Manager: OHS&E and Risk Management and subordinates (Document controller)
C:17			The Environmental Management section is responsible for the generation of procedural documents for specific operations and activities where environmental management and mitigation measures are a priority. The Environmental Management section is responsible for monitoring performance against the operational procedures and reporting on non-conformances during the monthly OHS&E meetings	Pre-commencement of operation and as required	Procedure available for all operations / tasks		Verify paperwork	Manager: OHS&E and Risk Management and subordinates (Document controller)
C:18			Departmental Managers are responsible for the rectification of any such non-conformances and the implementation of any corrective actions defined by the Environmental Coordinator	*Ad hoc*	Non conformances receive adequate, timeous attention		Weekly and monthly reports	Environmental Coordinators and H&E Officer
C:19	Socio-economic impacts	Maximise permanent employment by ensuring that not only are all positions filled but that employees continue to develop skills that will increase their employability after mine closure	Rössing Uranium should continue with its ongoing workforce training, extending it to the employees of the sulphur handling operation in the port and should, when the possibility of retrenchments becomes apparent, introduce training courses in alternative economic sectors and self employment. Training in alternative economic sectors should be aligned with the other major economic sectors in the Erongo Region	Continual and as required	Skills development programme to be established with the Arandis Town Council and be offered to Rössing Uranium employees		Training register	Manager: Sustainable Development and Rössing Uranium senior management
C:20			Rössing Uranium's recruitment policy should ensure equitable employment opportunities for marginalised groups. All operational phase Contractors should be required to adopt Rössing Uranium's recruitment policy. Rössing Uranium should, upon completion of the construction phase, recruit suitable personnel if required from the Contractor's workforce, to continue their employment in the operational phase of the expansion projects. Rössing Uranium should therefore assist the civil contractor in the suitable training and development of the construction workforce for later absorption into the workforce	Ongoing	Demographics of workforce should mirror regional demographics		Employment statistics	Manager: Sustainable Development and Rössing Uranium senior management
C:21			Rössing Uranium should expand its skills and capacity development programme to address the disadvantages of low skills and experience in the	Continual	Skills development programme to be established with the Arandis Town		Training register	Manager: Sustainable Development

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			labour pool. Such a programme should be extended to the sulphur handling facility workforce as well		Council and be offered to Rössing Uranium employees			and Rössing Uranium senior management
C:22		Minimise the exposure of the public to potential hazards associated with the sulphur handling operations in the port area.	Continue to develop and improve on its stringent OHS&E programmes and policies relating to management and monitoring of dust, noise, water, vehicle maintenance, operator training and emergency response plans	Continual	Compliance with ISO:EMS objectives		ISO:EMS Audit results	Manager: OHS&E and Risk Management and subordinates
C:23			Fully investigate all incidents involving the public and use the findings to inform amendments to policy and procedure	As required	Without exception		Incident reports	Manager: OHS&E and Risk Management and subordinates
C:24			The Rössing Uranium Foundation's community Health and safety as well as the HIV/AIDS community awareness programme should be extended to the workforce at the sulphur handling facility	Ongoing	Reduced HIV/AIDS prevalence, infection rate within range of influence. Improved health and safety awareness of workforce		Events, presentations, workshops, etc. Feedback obtained through surveys and questionnaires	Rössing Uranium Foundation
C:25	Managing and reducing the hazards associated with sulphur and sulphur derivatives	Minimising the build up of sulphur dust in storage areas	Ensure that only high quality, low-dust elemental sulphur product is procured	Pre-commencement and in continuity	Prills meet with specified standards		Testing of various product criteria with each shipment	Procurement manager
C:26			Cautious and gentle handling of the sulphur will minimise the build up and mobilisation of sulphur dust, plant operators to receive training and supervision. All transfer points are to operate with the minimum, practical fall heights.	Operational phase	Optimised in the opinion of the H&E, Safety officer and plant manager		Sulphur dust levels	Plant manager, H&E and Safety officer
C:27			Apply the necessary biocides to the sulphur prills to prevent structural deterioration of the prills	As required	Without exception		Procurement agreement	Procurement manager
C:28			Dust control systems at transfer points are to be kept in good working order.	As required	Without exception		Sulphur dust levels	Plant manager, H&E and Safety officer
C:29		Minimising the potential ignition, spread or sulphur fires or dust explosions	All sulphur stockpiling and handling areas to be equipped with the adequate fire prevention mechanisms and systems fitted with adequate fire-fighting equipment that can effectively contain the worst-case scenario fire that may occur there. All systems and equipment shall be properly and regularly maintained	Pre-operational-phase-commencement and regular maintenance	Up-to-date maintenance registers		Fire fighting equipment maintenance register	Plant manager, H&E and Safety officer

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
C:30			Other combustible installations, materials and/or sources of ignition must be kept well clear of areas where sulphur handling or storage operations are occurring	Ongoing	Without exception or incident		Routine OHSEC monitoring reports	H&E and Safety officer and Acid plant Manager
C:31			Sulphur handling and storage areas, plant and equipment must be operated in a manner that reduces the build up and potential ignition of sulphur dust, including the appropriate use and maintenance of grounding or earthing systems, use and maintenance of appropriate corrosive resistant, non-sparking or non-static conducting materials and the use of spark arrestors on mobile plant	Ongoing	Industry best practice		Routine OHSEC monitoring reports, final designs and equipment maintenance registers	Plant manager, H&E and Safety officer
C:32		Minimise the corrosive impacts associated with sulphur derivatives	Minimise the exposure of stockpiled sulphur to very high levels of moisture through maintenance of appropriate weatherproofing and preparations for extreme weather conditions as far as possible. Sulphur trailers used from the ship to the storage facility are to be covered.	As required	Weatherproofing of stockpile and storage areas in good condition, contingencies for extreme weather preparations in place		Routine OHSEC monitoring reports and plant maintenance registers	H&E and Safety officer and facility manager
C:33			Sulphur handling equipment should be constructed from aluminium which resists erosion and does not form pyrophoric iron sulphide that can initiate fires, explosions and generate SO_2	As required when equipment is replaced and modified	Optimised design meeting industry norms and standards, all subsequent additions or modification to meet with design specifications		Equipment and plant register, and equipment maintenance registers	Maintenance manager, facility manager, H&E and Safety officer
C:34			Elemental sulphur should also be treated with an anti-bacterial solution to prevent biological decomposition and the resulting formation of sulphuric acid	Each shipment	Without exception		Procurement agreement	Procurement manager
C:35			All storage areas shall operate on a first-in-first-out (FIFO) system, ensuring that no "dead" zones occur within the storage facility	Without exception	FIFO		Stock control and visual inspection, routine OHSEC monitoring reports	Facility manager, H&E and Safety officer
C:36			Imported sulphur shall be of high grade, must have been treated with biocides and degassed prior to shipping.	Pre-commencement and in continuity	Prills meet with specified standards		Testing of various product criteria with each shipment	Procurement manager
C:37		Minimising the generation of and risks associated with accumulation, exposure or loss of containment of H_2S and SO_2 gases	Mechanisms to prevent the build-up of these toxic gases and possible worker exposure shall be well maintained at all times	Ongoing	Features to control build-up of toxic gases are in place and in working condition		Equipment and plant maintenance registers. Incidents where gas levels near or exceed standards inside facilities	Facility manager, H&E and Safety officer
C:38			Rössing Uranium should ensure that a high quality, effectively degassed sulphur product is procured	Pre-commencement and in continuity	Prills tested and meet with specified standards		Testing of various product criteria and procurement	Procurement manager

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
							agreement	
C:39			Monitoring and setting limits with regard to the moisture content and H_2S content of the sulphur received	Pre-commencement and in continuity	Prills tested and meet with specified standards		Testing of various product criteria and procurement agreement	Procurement and facility manager
C:40			All sulphur handling and storage areas throughout the supply chain should be equipped with the appropriate detection, personal protective and emergency equipment, to ensure that employees are adequately safeguarded from the potential health effects of these deleterious gases. All detection and safety equipment to be regularly inspected and maintained or replaced where necessary.	Monthly inspections and calibration at specified intervals	All equipment in place and in a good state of repair / calibration		Physical inspections and current equipment calibration certificates	Facility manager, H&E and Safety Officer
C:41			All personnel working within the sulphur supply chain should be specifically trained and regularly assessed for competence with regard to safety, leaks, spills and emergency procedures	Pre-commencement and as required	Incidents handled appropriately		Training register and drill assessment results	H&E Officer
C:42	Health and safety considerations	Reduce health and safety risks by ensuring effective worker competence, training and awareness	All new and existing staff that will work in the sulphur handling and storage areas should undergo an intensive induction course in health, safety and environment	Pre-operational-phase-commencement	All staff received induction training before commencement of work in plant		Training register / attendance register	H&E officers / Safety training
C:43			All workers should undergo a medical examination to ensure that they are physically fit, mentally capable and are assessed as being competent to undertake the tasks to which they have been assigned	Pre-operational-phase-commencement	All staff medically cleared before commencement of work, without exception		Medical exam records	Manager Health and safety
C:44			Each staff member should also receive task-specific instruction and will be instructed on their terms of reference, which should clearly outline their duties and responsibilities, other pertinent health, safety, environmental and general protocols, as well as any EMS control procedures that have direct bearing on the area of operation	Pre-operational-phase-commencement	All staff received task-specific training before commencement of work in plant. A copy of all ISO procedures relevant to position to be issued		Training register. Discussions with staff	Plant operators, supervisors and H&E officers
C:45			Rössing Uranium should commence with recruitment/ promotion and training of plant operational personnel well in advance of the commissioning of the facility to ensure a suitable level of proficiency is achieved	Throughout the construction phase	All plant staff appointments are finalised for the plant testing at the end of the construction phase		Letters of appointment	Project management team, Manager: OHS&E and Risk Management and Rössing Uranium senior management.
C:46			Teams working in these areas should also receive *ad hoc* health, safety and environment training in the	Weekly	OHSEC topic to be included in toolbox talks at least		Training register	H&E Officer / team

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			form of toolbox talks to be held at least once a week		weekly			supervisors
C:47			An intense supervisory presence should be implemented during commissioning and for a period thereafter, to ensure that EMS protocols are clearly understood by the plant operational staff	First three months after commissioning	Supervisory staff, plant managers and other technical staff to allocate the majority of their time to supervision of plant operations		Physical verification	Supervisors, plant manager's and H&E officers
C:48			All facilities should also to be fitted with the required health and safety warning and information signage that is required and suitable for such installations	Pre-operational-phase-commencement	Warning and information signage to comply with international norms and standards		Physical verification	H&E Officer and Manager Health and safety
C:49			Protected eating areas are to be provided and no eating or exposed foodstuff is to be permitted within the main shed areas.	At Commencement of operational phase	Sealed eating areas present, and maintained in good and hygienic order		Physical verification	H&E Officer, Manager Health and safety and Safety Training
C:50		Ensure adequate emergency procedures are in place to reduce the magnitude of the impacts in the event of an emergency	Induction training should include detailed coverage of the emergency response and evacuation procedures	Pre-operational-phase-commencement	Emergency procedures to be complete, approved and appropriate. Emergency procedures are included in induction and task specific training		Verify paperwork, induction syllabus and training register. Evacuation signage to be appropriately posted in the facility (i.e. Exits)	H&E Officer, Manager Health and safety and Safety Training
C:51			An evacuation plan should be developed and presented to the staff at each work station that will clearly identify the protocols to be followed in the event of an emergency, the location and functioning of the emergency escape routes and doors, and the emergency assembly areas	Pre-operational-phase-commencement	Emergency procedures to be complete, approved and appropriate. Emergency procedures are included in induction and task specific training		Verify paperwork, induction syllabus and training register. Evacuation signage to be appropriately posted in the facility (I.E. Exits)	H&E Officer, Manager Health and safety and Safety Training
C:52			All emergency equipment and personal protective equipment should be pointed out, easily available and staff should be trained in their use	At commencement during induction and task specific training	All staff to be trained in the use of all emergency equipment in their respective works area		Training register	H&E Officer, Manager Health and safety and Safety Training
C:53			Induction training should include basic first-aid and fire-fighting training	Induction and task specific training and as required throughout the operational phase	All staff to know the basic first aid principles, especially those related to the type of accidents occurring within their work area		Training register, induction syllabus	H&E Officer, Manager Health and safety and Safety Training
C:54			Each work station should have a staff member that is trained in first-aid and another as a fire officer.	Continual	Certified First aider present on every shift		Physical verification	H&E Officer and Manager Health and safety
C:55		Ensure that there are adequate and appropriate first aid	The facility shall be equipped with adequate first-aid provisions to deal with the type of injuries that may occur there.	As required	First-aid box and certificate of training for designated staff		Physical verification	Safety officers, supervisors

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
		provisions to respond to accidents in the facility						
C:56		Ensure a safe work environmental for employees and that exposure to occupational risks are minimised	All work areas are to be adequately ventilated and lit.	As required	Meets with occupational Health and Safety statutory requirements		Physical verification	Safety officers and Supervisors
C:57			All staff should be equipped with the necessary personal protective equipment (PPE), including respirators where appropriate, to limit their exposure to risks presented by their task or area of operation	As required	Without exception		Physical verification	H&E Officer, Safety Officers
C:58	Waste Management	Appropriate handling, storage and disposal of domestic waste arising for the sulphur storage facility	The facility is to be equipped with rubbish bins and waste storage area. Rössing Uranium shall make use of the waste collection and disposal services available in the Port. This applies to general domestic waste only	At commencement and in continuity	No incidents or mismanagement reported by H&E officer		Physical verification, waste disposal certificates	H&E Officer, Plant manager
C:59		Appropriate Handling, storage and disposal of hazardous waste arising from sulphur handling operations	Waste sulphur is to collected in designated bins and disposed of at an appropriate facility, such as the hazardous waste cell at the Walvis Bay landfill or removed to the mine's hazardous waste facility on the tailings dams.	As required	Without exception		Physical verification and supervision over operations	H&E officer
C:60		Appropriate Handling, storage and disposal of sewage from the sulphur facility	The sewage system will tie in with the existing reticulation in the port.	Operational phase	Without exception		Physical verification	H&E officer, Waste water treatment plant operator
C:61		Appropriate handling, storage and disposal / recycling of scrap metal	Scrap metal arising from repair and maintenance work would be collected sorted and sent for recycling	As required	100% scrap metal recycled			
C:62		Appropriate handling, storage, disposal and recycling of used hydrocarbons	The reuse and disposal of hydrocarbons from the sulphur handling operations is to be undertaken in a controlled and appropriate fashion	As Required	In compliance with EMS procedures and industry best practice		Physical verification, waste disposal / recycling certificates	H&E Officer, Plant manager
C:63			Suitable, leak-proof drums for the disposal of oils and greases should be positioned at areas where such materials are likely to be generated such as the wash bay and workshop.	At commencement and in continuity	No hydrocarbon waste or contaminated items to be disposed of in domestic or other waste bins		Physical verification and monitoring reports	H&E Officer, Plant manager

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
C:64			Drums should be marked according to the type of hydrocarbon being deposited namely synthetic oil, mineral oil or grease	At commencement and in continuity	All drums are to have correct markings and no hydrocarbon waste or contaminated items to be disposed of in domestic or other waste bins and vice versa		Physical verification and monitoring reports	H&E Officer, Plant manager
C:65			Rössing Uranium has a hydrocarbon product supply contractor who could deal with the management of such materials	Operational phase	Maintain status quo and continue to monitor sub-contractor's performance		Physical verification and verification of paperwork	H&E Officer, Safety Officer and hydrocarbon supply contractor
C:66	Dust suppression	Preventing the generation and mobilisation of sulphur dust from sulphur stockpile areas	Stockpile and storage area wind protection systems to be effective and in good state of repair. Cross ventilation to be monitored and rectified if required to reduce wind and eddying inside storage shed	Operational phase	No visible sulphur dust leaving storage facility or found in the surrounds		Visual inspection, routine OHSEC monitoring reports	Facility manager, H&E Officer and Safety Officers
C:67		Reducing sulphur dust arising from its transportation	Sulphur is to be transported in covered trailers and all conveyor systems, transfer points and reclamation areas should be equipped with dust suppression systems, sprayers, pneumatic systems or physical barriers.	Operational phase	No visible sulphur dust leaving transport line		Visual inspection, routine OHSEC monitoring reports	Facility manager, H&E Officer and Safety Officers
C:68	Noise management	Limit the amount of noise generated by the sulphur handling activities operations	All plant and equipment should receive regular maintenance and should be operated in accordance with their design specifications. All mechanically powered equipment should be fitted with appropriate silencing devices which are to be inspected and repaired when necessary	Operational phase	All equipment in a good state of repair		Daily operator's vehicle inspection sheets. Routine OHSEC monitoring and reporting and service records	H&E and Safety Officer
C:69			Equipment noise audits should be carried out on all new plant and equipment upon delivery to site. These records should be used as a reference to monitor the potential deterioration of equipment noise levels during operation	Pre-operational-phase-commencement and as required	Records are kept up to date and are used as a point of reference in ongoing noise monitoring		Noise monitoring data sheets	H&E and Safety Officer
C:70			Environmental noise monitoring should be carried out regularly to detect deviations from predicted noise levels and enable corrective actions to be implemented where necessary	Operational phase	Noise levels remain within the specified standards		Noise monitoring data sheets	H&E and Safety Officer
C:71			All potential excessive sources of noise from plant or operational areas should be considered in the layout and design of the facilities. Noisy operations or equipment shall occur within areas where sufficient noise dampening exists or where such noise will not affect workers or closest recipients. This includes the	Operational phase	Plant operation does not result in above standard exterior noise level or excessive noise at closest recipients		Noise monitoring data sheets and routine OHSEC monitoring reports	Facility manager, H&E and Safety Officer

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
			minimisation of reversing of equipment with reverse sirens during night-time offloading operations.					
C:72			Where noise levels pose a health and safety risk, demarcated noise zones will be instituted and affected staff should wear the appropriate hearing protection equipment.	Pre-operational-phase-commencement and as required	All high-noise-zones are to have adequate demarcations and warning signage		Physical verification and routing noise monitoring (Personal exposure)	H&E and Safety Officer
C:73	Visual impact	Minimise the visual impact associated with the lighting of the facility during the night	Lighting of the facility should be kept to the efficient minimum	Design phase and as required	All lighting meets the minimum safety requirements. No unnecessary lighting, flood lighting or up lighting is occurring		Physical verification and routine OHSEC monitoring and reporting	H&E and Safety Officer
C:74			Lighting in and around the facility should adopt the principle of downward facing, task-specific lighting with limited spillage of light into the surrounding areas	Design phase and as required	All lighting meets the minimum safety requirements. No unnecessary lighting, flood lighting or up lighting is occurring. Facility visibility from key vantage points is limited at night		Physical verification and routine OHSEC monitoring and reporting	H&E and Safety Officer
C:75			Flood lighting of extensive outdoor areas and up-lighting of vertical structures shall not be permitted	Design phase and as required	All lighting meets the minimum safety requirements. No unnecessary lighting, flood lighting or up lighting is occurring. Facility visibility from key vantage points is limited at night		Physical verification and routine OHSEC monitoring and reporting	H&E and Safety Officer
C:76		Minimise the visual impact associated acid plant by day	Sound housekeeping practices in material lay-down areas and stockpiles, litter control and general facility maintenance should be undertaken to ensure that the visual appearance of the facility does not deteriorate and become visually offensive with the passing of time	Operational phase	All lay down, staging and stockpiling areas meet with the satisfaction of the relevant OHSEC inspectors		Physical verification and routine OHSEC monitoring and reporting	H&E and Safety Officer
C:77	Water management	Control of movement of storm water around the facility to prevent potential contamination of flows with sulphur and sulphur derivatives	Cut-off drains and berms, along with the concrete containment bunding and flooring to ensure that surface flows are prevented from entering the facilities, shall be cleaned regularly	Operational phase as required	Storm water controls are cleared as required and are free from obstacles and excessive sedimentation		Routine OHSEC monitoring reports. Maintenance register	Facility manager, delegated maintenance crews and H&E officer

ID:	Aspect	Management Objective	Management Action	Action Frequency	Target / Standard	Rössing Uranium EMS Reference	Indicator	Responsibility
C:78		Control of potentially contaminated storm and wash water	Storm water collecting within the containment bunding that may have been contaminated with sulphur or sulphur derivatives, hydrocarbons and other potentially hazardous chemicals should be collected in an appropriately designed drainage network and collection sump. This should be directed to a water treatment facility. All components of the contaminated water management system must be routinely maintained.	Operational phase at quarterly intervals	No pollution incidents, contaminated storm water system visibly maintained		Physical verification and routine OHSEC monitoring and reporting	H&E officer
C:79		Water conservation systems to conserve water though the application of principles of reduce, reuse and recycle	Rössing Uranium must monitor water usage and seek efficiencies where ever possible in accordance with the principle of "continual improvement"	Operational phase	Comprehensive, up-to-date and complete water usage records are kept		Verify water use database	H&E Officer and Plant Manager
C:80			Identify, assess and implement feasible measures to reduce, reuse and recycle water as part of the water management strategy	Operational phase	Water conservation strategies are formally investigated and implemented where feasible		Formal investigation of water conservation strategies. Routine OHSEC monitoring and reporting. Rössing Uranium's water balance and water usage database	H&E, Safety Officer and Plant Manager

DECOMMISSIONING PHASE

This Section of the SEMP discusses potential OHSEC considerations that should be revisited at the decommissioning phase of the sulphur handling facility. This section is not prescriptive, due to there being no absolute certainty regarding the future timing of the decommissioning phase, and as a result of the final detail design information being unavailable at this point.

Rössing Uranium have been planning for mine closure since 1991. A comprehensive Closure Management Plan, updated in 2005, is in place and considered two closure scenarios, i.e. an extended mine life to 2016 or a 2009 closure. Besides being guided by Rio Tinto standards, the closure plan was also informed by technical studies and incorporates a strategy to deal with the related social issues.

The 2005 Closure Management Plan describes Rössing Uranium's vision for mine closure and identifies the critical areas that would require specified management. These refer mostly to the condition of the pit void, consequences for employees and the community, the status of contaminated processing and waste sites, and plant and infrastructure implications, which at 2005 included the closure of the acid tank farm in the Port of Walvis Bay. Stakeholder consultation is recognised as vital in finding the most sustainable post-closure situation.

Using the approach of risk identification and mitigation, the Closure Management Plan addressed social and environmental risks as well as business risks. In developing the mitigation measures required to manage the identified risks, the financial and human resources needed to achieve such mitigation were defined and quantified. The further studies that would be required to allow for comprehensive planning for decommissioning are described.

The present SEIA process is part of Rössing Uranium's evaluation of extending the life of the mine beyond 2016. The specific component being assessed, i.e. the sulphur handling facility in Walvis Bay, would become integral part of the entire mine operation and subject to common operational procedures.

It is recommended that, should MET:DEA issue the necessary clearance for the sulphur handling facility in Walvis Bay, the closure strategy or decommissioning plan would require amendment to include this component and should be incorporated into a revision of the already existing Closure Management Plan. Such planning should also occur at a future time, closer to the mine closure event so that prevailing legislation and best practice that future time can be applied to the decommissioning of the sulphur handling facility and that such plan may take advantage of the opportunities in the port of Walvis Bay at that time. It should be noted that the sulphur handling facility would lend itself to numerous other activities without requiring extensive modification and could thus be sold off as a going concern.

This draft SEMP should be seen as the precursor to a more comprehensive plan that will follow as the approval process continues and the specifics of the engineering design become available.

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APPENDIX A: RÖSSING URANIUM HSE POLICY

Rio Tinto

RÖSSING URANIUM LIMITED HEALTH, SAFETY AND ENVIRONMENTAL POLICY
January 2009

Excellence in Health, Safety and Environmental (HSE) management is one of the foundations of Rössing's vision to be a safe, long-term supplier of U3O8 to the nuclear power industry around the world. This is in line with our commitment to corporate citizenship, social responsibility and sustainability.

To accomplish this, Rössing will:

- Recognise that nothing is more important than the protection of the Health and Safety of our stakeholders, specifically, our employees, contractors, host communities, clients and shareholders
- Commit to operate our business with respect and care for both the local and global Environment in order to prevent and mitigate residual pollution
- Be in full compliance with all applicable legal, standards and requirements
- Seek continual improvement in HSE performance and adopt leading practice where applicable and feasible
- Provide adequate training and resources to employees, contractors and visitors.
- Identify and assess hazards arising from our activities and manage associated risks to the lowest practical level
- Enhance biodiversity protection by assessing and considering ecological values and landuse aspects in investment, operational and closure activities
- Continue in our efforts to raise the awareness of HSE issues to our host communities
- Regularly review our performance and publicly report our progress
- Communicate our commitment to this HSE policy to all our stakeholders and ensure that this policy is readily available to all our stakeholders

In implementing this Policy we will engage in constructive dialogue with our employees, contractors, host communities and all other stakeholders in sharing relevant information and responsibilities for meeting our objectives.

The HSE policy document is complimented by the HSE strategy document which is readily available to all our stakeholders.

MIKE LEECH
Managing Director

APPENDIX B: LIST OF RÖSSING URANIUM'S ISO EMS PROCEDURES

A1 – OH Standards -	General occupational health systems
A2 - OH Standards -	Risk management
A3 - OH Standards -	Workplace monitoring
A4 - OH Standards -	Medical and first aid treatment
A5 - OH Standards -	Occupational medical surveillance
A6 - OH Standards -	Records
B1 - OH Standards -	Particulate and gas or vapour exposures
B2 - OH Standards -	Hearing conservation
B3 - OH Standards -	Manual handling and vibration
B4 - OH Standards -	Hazardous substances
B5 - OH Standards -	Radiation
B6 - OH Standards -	Thermal stress
B7 - OH Standards -	Fitness for work
B8 - OH Standards -	Legionnaires disease
B9 - OH Standards -	Travel and remote site health
B10 - OH Standards -	Occupational exposure limits

A1 -	General Safety Systems
A1.1 -	Health & Safety Self Audits
A1.10 -	28.5(b) Appointment of Responsible persons
A1.11 -	Risk Manager
A1.12 -	Induction
A1.13 -	Permit to Work and Clearances System
A1.14 -	Aisles, Storage & Demarcation
A1.15 -	Colour Coding
A1.16 -	Barricading and Demarcation
A1.17 -	Machine Guarding
A1.18 -	Compressed Gas Cylinder – Pressure vessels
A1.19 -	Personal Protective Equipment
A1.2 -	First Responder Training
A1.20 -	Alarm System
A1.21 -	Hand Tools
A1.3 -	Emergency Planning
A1.4 -	Planned Task Observations
A1.5 -	WSWP & Risk Assessment
A1.6 -	Storage of Flammable & Explosive Material
A1.7 -	Risk Assessment
A1.8 -	Safety Training Courses
A3.1 -	Contractor Management
B1 -	Recording and Reporting
B1.1 -	Health & Safety off the Job
B1.2 -	Injury - Disease statistics

B1.3 - Injury Experience Information Board
B1.4 - Incident Statistics
B1.5 - Accidents recording and investigations
C1.1 - Isolation
C2 - Electrical Safety
C2.1 - Earth leakage protection relays
C2.2 - Portable Electrical Equipment
C2.3 - Electrical Installations
C2.4 - Labelling of Switches, Isolators and Valves
C3 - Light Vehicle Guidelines
C3 - Vehicles and Driving
C3.1 - Vehicles and Driving
C4 - Working at Heights
C4.1 - Ladders, Stairs, Platforms & Scaffolding
C4.2 - Fall Protection Equipment
C5.1 - Confined Spaces
C6 - Cranes and Lifting 2006 REV 0
C6. - List of Critical Lifts
C6.1 - Cranes and Lifting

Environment Standard - Water Use and Quality Control
Environment Standard - Acid Rock Drainage Prediction and Control
Environment Standard - Air Quality Control
Environment Standard - Environmental Management System
Environment Standard - Greenhouse Gas Emissions
Environment Standard - Hazardous Material and Contamination Control
Environment Standard - Land-Use Stewardship
Environment Standard - Mineral Waste Management
Environment Standard - Noise and Vibration Control
Environment Standard - Non-Mineral Waste Management

EMSAUD001 Rev 1 - Procedure carrying out environmental audits at Rössing Uranium
EMSAUD001 Rev 5 - Procedure carrying out environmental audits at Rössing Uranium
EMSAUD002 Rev 5 - Environmental audit schedule for the year 2003
EMSAUD002 Rev1 - Environmental audit schedule for the year cycle from July 1999 to July 2001
EMSMPS001 - Monitoring Programme for Processing
EMSMPS002 - Monitoring Programme for Mining
EMSMPS002 Rev 1 - Minewide Monitoring Programme
EMSMPS003Rev.1 - Monitoring Programme for Services Departments
EMSOPS001 - Monitoring and Measurement
EMSOPS001Rev 2 - Monitoring and Measurement
EMSOPS002Rev 2 - Communication and Reporting
EMSOPS002Rev.1 - Communication and Reporting
EMSOPS003 - Document Control Procedure
EMSOPS003Rev 2 - DOCUMENT CONTROL PROCEDURE
EMSOPS004 Rev 3.0 - Environmental Record-keeping Procedure

EMSOPS005 Rev 3 - Updating of the Legal Register
EMSOPS006 Rev 3 - Setting up of the Environmental Aspects Register
EMSOPS007 Rev 3 - External Communications/Complaints
EMSOPS008 - Development and Review of Environmental Management Programme
EMSOPS009 - Incident Exeedence –To be reported in EMS Database
EMSOPS010Rev2 - Reporting and investigation of Environmental incidents
EMSOPS011Rev2 - Reporting and follow-up of environmental non-conformances
EMSOPS012Rev2 - EMS Files in All Operational Areas
EMSOPS013Rev1 - Identification of training needs and training methods
EMSOPS014 - Procedure to operate the electronic EMS database
EMSPOL001 Rev 1 - HSE Policy Strategies
EMSTEM001 - Environmental Management Programme
ENV/EMR/004 - Emergency procedure to be followed in the event of a HEF storage tank bursting in the HEF Plant
ENV/ENG/KHAN/001 Rev 1.0 - Khan River Water Supply
ENV/ENG/KHAN/002 Rev 1.0 - Khan River Vegetation Monitoring
ENV/ENG/SCP/001 - Operation of the Diesel Seepage Collection System in the Open Pit
ENV/ENG/SCP/002 Rev 1.0 - Operation and Monitoring of the Seepage Control Systems
ENV/ENG/SPP/001 - Monitoring of Sewage Plants
ENV/ENG/SPP/002 - Operation of Sewage Plants
ENV/ENG/WQM/001 - Water Quality Monitoring
ENV/ENG/WQM/002 - Water Quality Management
ENV/ENG/WSM/001 - Fresh Water Supply Management
ENV/ENG/WSM/002 - Water Recycling and Re-use
ENV/OHP/001 - Urinalysis Sampling Procedure
ENV/OHP/002 - Analysis of Smear Sample for Alpha, Beta and Gamma Radiation with Smart Radiation Monitor
ENV/OHP/003 - Area Radiation Survey for Total Alpha and Beta Contamination
ENV/OHP/004 - Area Survey for External Gamma Radiation
ENV/OHP/005 - Radon Survey
ENV/OHP/007 - Area Radiation Contamination Survey using Smear Samples
ENV/OHP/008 - Area Respirable Dust Sampling
ENV/OHP/009 - Personal Respirable Dust Sampling
ENV/OHP/010 - Area Noise Survey
ENV/OHP/011 - Procedure for Fixed Position dust Sampling at Primary Crushing Plant
ENV/OHP/012 - Procedure for Personal Respirable Dust Sampling on Open Pit Equipment Operators.
ENV/OHP/013 - Procedure for Fixed Position Dust Sampling at Fine Crushing Plant
ENV/OHP/014 - Procedure for total Fixed Position Dust Sampling at Final Product Recovery
ENV/OHP/015 - Procedure for Total Fixed Position Manganese Dust Sampling Manganese Plant
ENV/OHP/016 - Procedure for Total Personal Dust Sampling in Final Product Recovery
ENV/OHP/017 - Procedure for Contact Radiation Monitoring (Beta/Gamma) in Final Product Recovery
ENV/OHP/018 - The Monitoring of Personal Radiation Dose
ENV/OHP/019 - Personal External Radiation Dose Monitoring with a Dosicard
ENV/OHP/022 - Procedure for Reporting of Dust Exceedance in Open Pit Equipment
ENV/OHP/023 - Procedure for Dust Sampling on Trolley Line Fixed Positions
ENV/OHP/024 - Procedure for Conducting an Occupational Risk Assessment

ENV/OHP/025 -	Heat Stress
ENV/OHP/026 -	Personal Noise Survey
ENV/OHP/027 -	The Measurement of Hand-Arm Vibration
ENV/OHP/028 -	The Measurement of Whole Body Vibration
ENV/WSM/003 -	Procedure for Reporting Contractors Water Consumption
ENVCHP001 -	Purchasing of chemicals
ENVCLS001 -	Procedures for maintenance work carried out on the CIX contractors
ENVCLS002 -	Procedures for the Control of Asbestos Exposure at the Acid Plant
ENVCLS003 -	The Control of Occupational Hazards During Thickener Overhaul
ENVCLS004 -	Procedure for radiation monitoring of equipment leaving the Rössing Uranium site
ENVCLS005 -	Environmental Clearance
ENVCLS006 -	Procedure for radiation monitoring of product containers leaving site
ENVCLS007 Rev.1 -	Procedure for the control of Asbestos exposure when working on haul truck grid box
ENVCLS008 - pads on mobile cranes	Procedure for the control of asbestos exposure when replacing worn or damaged brake
ENVCLS009 - CIX and SX	Procedure for the control of asbestos used as packing on pumps in Reduction-Tailings;
ENVCLS010 -	Confined Space Clearance
ENVCLS011 -	Product Shipment Inspection and Monitoring Procedure
ENVDCP001 -	Document Control Procedure
ENVEMR001 -	Anhydrous Ammonia Uncontrolled Leak
ENVEMR002 -	Uranium Oxide Emergency Spillage Procedure
ENVEMR003 -	SO_2 emergency procedures
ENVESP001 -	Multi-Vertical Sampler procedure
ENVESP002 -	Monitoring ambient SO_2 concentrations using the Dasibi continuous SO_2 monitor
ENVESP003 -	Monitoring ambient dust levels using the continuous Dasibi (Series 7001) dust monitor
ENVESP004 -	Monitoring ambient dust levels using high volume samplers
ENVESP005 -	SO_2 monitoring using Huey Sulphation Plates
ENVESP006 -	Monitoring Procedure for radon exhalation
ENVESP007 -	The collection and calibration of weather data from the Point Bill weather station
ENVESP008 -	Drager Multigas Detector Operating Instructions
ENVINS001 -	Instrument Procedure for the MX21 Gas Detector
ENVINS002 -	Instrument Procedure for the Automess 6150 AD4 Dose Rate Meter
ENVINS003 -	CRL 701 Noise Dosimeter Operating Instructions
ENVINS004 -	Determination of the radon concentration using the pAEC monitor
ENVINS005 -	Calibration of Personal Air Sampling Pumps
ENVINS006 -	Operation, calibration and maintenance of the Dualarm Monitor
ENVINS007 -	Instrument procedure for the model 550 Alpha WL Monitor
ENVINS008 -	Operation, Calibration and Maintenance of Mettler MT5 Balance
ENVINS009 -	Instrument procedure for the model FM-1 magnetic field meter
ENVINS010Rev.1 -	Heat Stress
ENVINS011 -	Iso-kinetic Stack Sampling
ENVINS012 -	Casella Heat Stress Monitor HSM 100
ENVINS013 -	Instrument Procedure for the AMS950 Static Airborne Particulate Monitoring System
ENVINS015 -	Smart Radiation Monitor
ENVINS016 -	Operation and maintenance of the Gilair-3 air sampler

ENVINS017 -	Gilian Gilibrator-2 Calibrating System
ENVINS018 -	Khan Electro Balance Model 4700 operating instructions
ENVINS019 -	Operating Instructions for the Electra and DP2R/4A probe
ENVINS020 -	B&K Integrating Precision Sound Level Meter type 2203 operating instructions
ENVINS021 -	Operation and maintenance of the Osiris environmental dust monitor
ENVINS022 -	Operation and maintenance of the Andersen ambient particle sizing sampler.
ENVINS023 -	Operation and maintenance of the Dry Frisbee Deposit Gauge
ENVINS024 Rev.1 -	The control and effective use of the Environmental monitoring instruments
ENVINS025 -	Operating procedure for the Hund direct reading dust sampler
ENVINS026 -	Procedure for ML98 RSR Radon WL Monitor
ENVINS027 -	Procedure for ML114 long-lived alpha counting system
ENVOHP001 -	Urinalysis Sampling Procedure
ENVOHP002 -	Analysis of smear sample for alpha & beta radiation with SMART radiation monitor
ENVOHP003 -	Area Radiation Survey for Total Alpha and Beta Contamination
ENVOHP004 Rev 1 -	Area Survey for External Gamma Radiation
ENVOHP005 -	Radon Survey
ENVOHP006 -	Procedure for total personal dust sampling in Final Product Recovery.
ENVOHP007 -	Area Radiation Contamination Survey using Smear Samples
ENVOHP008 -	Area Respirable Dust Sampling
ENVOHP009 -	Personal Respirable Dust Sampling
ENVOHP010 -	Noise Survey
ENVOHP011 -	Procedure for Fixed Position Dust Sampling at Primary Crushing Plant
ENVOHP012 -	Procedure for Personal Respirable Dust sampling on Open Pit Equipment Operators
ENVOHP013 -	Procedure for Fixed Position dust Sampling Fine Crushing Plant
ENVOHP014 -	Procedure for Total Fix Position dust Sampling Final Product Recovery
ENVOHP015 -	Procedure for Total Fix Position Manganese Dust Sampling Manganese Plant
ENVOHP016 -	Procedure for total personal dust sampling in Final Product Recovery
ENVOHP017 -	Procedure for contact radiation monitoring (Beta/Gamma) in Final Product Recovery
ENVOHP018 -	The monitoring of Personal Radiation Dose
ENVOHP019 -	Personal external radiation dose monitoring with a dosicard
ENVOHP020 -	Procedure for Reporting of Dust Exceedances and in Open Pit Equipment
ENVOHP021 -	Dust Sampling on Open Pit Benches with the Hund Monitor
ENVOHP022 -	Procedure for reporting of dust exeedances in Open pit equipment
ENVOHP023 -	Procedure for dust sampling on trolley line fixed positions
ENVRPP001 -	Environmental Induction for work carried out in FPR
ENVRPP002REV1.1 - PM-1	Procedure for the monitoring employees existing from FPR during break-downs of the Personnel Monitor
ENVRPP003 -	Procedure for Maintenance Work Carried out on Rotoscoops In Situ
ENVRPP004REV1.2 -	Respiratory Equipment Refer to: Health and Safety Manual Element No's 2.17 & 2.45
ENVWMP001 -	Redundant Tyres
ENVWMP002 Rev1 -	Disposal and re-use of hydrocarbons
ENVWMP003REV1 -	Disposal of oils containing PCB's
ENVWMP004 -	Disposal of fluorescent tubes
ENVWMP005 -	Disposal of redundant chemicals
ENVWMP006 -	Disposal practice for the Rössing Uranium landfill site
ENVWMP007 -	Disposal of Cardboard Boxes, Metal Drums and Wood for recycling purposes

ENVWMP008 -	Disposal of contaminated items
ENVWMP009 -	Transport of contaminated items
ENVWMP010.Rev 1 -	Procedure for action taken in the event of diesel or oil spillage
ENVWMP011 -	Disposal of contractor's fluorescent tubes
ENVWMP012 Rev 2 -	Disposal of oil and diesel filters
ENVWMP013 -	Used oil disposal from FPR
ENVWMP014 Rev1 -	Bioremediation of hydro-carbon contaminated soil and sludge
ENVWMP015 Rev 1 -	Disposal of oil trap residue to oil separation tank
ENVWMP016 -	Used Battery Disposal
EVNWMP013 -	Used oil disposal from Final Product Recovery
HSECOP001 -	Code of Practice for protection against ionising radiation
HSECOP002 Rev.1 -	Code of Practice for The Control Of Asbestos At Work
HSECOP003 -	Environmental Management System Code of Practice
HSECOP003 Rev 2 -	Environmental Management System Code of Practice
MINOPS001 -	Waste rock-dump planning and design
MINOPS002 -	Procedure for mining sand at the sand pit
PRO/FCP/001 -	Fine Crushing wash down schedule
PRO/FCP/002 -	Start & Stop procedures of the dust collectors in the Fine Crushing Plant
PWM/KHAN/001 -	Khan River Water Supply and Monitoring
PWM/OPP/002 -	Operation of Oil Separation Plant
PWM/SCP/002 -	Operation and Monitoring of the Seepage Control Systems
PWM/SPP/002 -	Operation of Sewage Plant
PWM/WSM/001 -	Fresh Water Supply Management
PWM/WSM/002 -	Water Recycling and Re-use
PWMKHAN001 REV.2 -	Khan River water supply and monitoring
PWMOPP001 REV. 1. -	Operation of the oil separation plant
PWMSCP002 REV.2 -	Operation and monitoring of the seepage control systems
PWMSPP002 REV.1 -	Operation of sewage plant
PWMWSM001 REV.1 -	Fresh water supply management
PWMWSM002 REV.1 -	Water recycling and re-use

APPENDIX C: CONDITIONS OF AUTHORISATION