



A NAMIBIA DE BEERS PARTNERSHIP

**NAMDEB COMPANY POLICY**

**ACCOUNTABILITY:** Head Mineral Resource and Environment

**POLICY No:** P0-EV-09

**DISTRIBUTION:** Section Heads

**REVISION No:** 06

**ORIGINATION DATE:** 14/02/2000

**DATE REVIEWED:** 20/03/2018

**RESPONSIBILITY:** Environmental Manager

**RELATED POLICY:** PO-EV-10

**SCOPE OF NAMDEB'S ENVIRONMENTAL MANAGEMENT SYSTEM**

**1. INTRODUCTION**

The Environmental Management System (EMS) standard ISO 14001:2015 requires that the organisation shall:

1.1 determine the scope of the environmental management system by determining the boundaries and applicability of the environmental management system to determine the scope and shall consider the external and internal issues; the compliance obligations; its organizational units; functions and physical boundaries; its activities, products and services; its authority and ability to exercise control and influence.

**2. THE SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM**

Namdeb distinguishes between an implementation/operational scope and a certification scope. A detailed description of the rationale behind the company's scope is described in the Environmental Policy Manual (PO-EV-10).

**2.1. OPERATIONAL SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM**

Namdeb Diamond Corporation (Pty) Limited operates diamond mines on the west coast of Namibia. Operations include mining of riverine deposits, coastal terraces, marine and aeolian deposits as well as marine, surf-zone and beach mining. To a lesser extent, mining of small terrestrial deposits is carried out by independent companies contracted to Namdeb. Mining and/or Exploration takes place in Orange River Mining Licence (ML42), Mining Area 1 Mining Licence (ML43), Bogenfels Mining Licence (ML44), Elizabeth Bay Mining Licence (ML45), Douglas Bay Mining Licence (ML46) and Mining Licences 128A, B and C. The Namdeb administrative Head office is based in Windhoek.

The Environmental Management System is rolled out across the life cycle of the mine from Exploration, Projects, Operations and Closure.

**Orange River Mining Licence operations (ML42)**

- Large scale open cast mining and processing at Daberas and Sendelingsdrif mines
- Prospecting of Orange River terraces, e.g. Arriesdrif, Auchas Lower, Obib
- Rehabilitation of selected activities

**Mining Area 1 Mining Licence operations (ML43)**

- Large scale terrestrial operations inclusive of accretion /beach nourishment, groynes, dredges and seawalls, conventional mining and associated treatment plants
- Exploration operations
- Vessel-based near-shore mining by Namdeb contractors
- Rehabilitation of selected activities

**Bogenfels Mining Licence operations (ML44)**

- Prospecting of marine, aeolian and deflation deposits
- Small-scale beach mining by independent contractors
- Shore-based subtidal marine mining by independent contractors
- Vessel-based near-shore mining by independent contractors
- Rehabilitation of selected activities

**Elizabeth Bay Mining Licence operations (ML45)**

- Large scale terrestrial mining of aeolian deposits
- Exploration
- Small-scale beach mining by Namdeb contractors
- Shore-based subtidal marine mining by Namdeb contractors
- Vessel-based near-shore mining by Namdeb contractors
- Rehabilitation of selected activities

**Douglas Bay Mining Licence operations (ML46)**

- Prospecting
- Small-scale beach mining by independent contractors

**Mining Licences 128A, 128B and 128C**

- Midwater prospecting/sampling and future mining

Detailed descriptions of these activities may be found in the Namdeb Environmental Management Programme Reports, kept by the Environmental Section.

## **2.2. CERTIFIED SCOPE OF THE ENVIRONMENTAL MANAGEMENT SYSTEM**

Only the EMS of active operations is certified to the ISO14001 standard. The certified scope for Namdeb includes all activities, products, services and facilities that Namdeb control or influence that have or can have a significant impact on the environment related to: mining, engineering and treatment activities and processes associated with alluvial diamond mining within all active mining areas. This includes Orange River Mines (including Sendelingsdrif and Daberas) in ML42, Mining Area 1 (ML43) and Elizabeth Bay Mine (ML45).

Namdeb Head Office in Windhoek mainly serves as an administrative entity giving additional top level administrative i.e. financial, legal, information management and corporate communication support to operations around Oranjemund and Lüderitz. The Namdeb Head Office in Windhoek does not form part of the certified scope. Links to the Namdeb Head Office is described in the Environmental Policy Manual (PO-EV-10). All downstream activities related to diamond mining is also excluded from the certified scope of the company.

Support services such as town, security and administration are not included in the ISO certified scope but where necessary form part of some of the elements of the existing Environmental Management System. Exploration as well as activities in Douglas Bay (ML46) and ML128A, B and C mining licence areas, independent small contractors and the rehabilitation activities at Bogenfels ML45 (Pocket Beach sites 11 and 12) do not form part of the ISO certified scope.

## **3. BENEFITS OF CONFORMANCE / IMPACTS OF NON-CONFORMANCE**

### **3.1. BENEFITS OF CONFORMANCE**

Conforming to this policy will ensure that Namdeb understands the scope of the organisation and ensures that it achieves the intended outcomes of its environmental management system with the aim to identify impacts to environmental conditions and issues that may affect the organisation.

### **3.2. IMPLICATIONS OF NON-CONFORMANCE**

In the absence of an understanding of the scope and associated aspects and risks of the organisation, it may lead to reputational, legal and negative stakeholder perceptions which may impact the business negatively.

  
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Riaan Burger  
**CHIEF EXECUTIVE OFFICER**

DATE 17/x/2018