

03 March 2023

To
The Environmental Commissioner
Directorate of Environmental Affairs
Ministry of Environment, Forestry and Tourism
Private Bag 13306
Windhoek

Dear Commissioner Timoteus Mufeti,

REQUEST FOR EXEMPTION FROM HERITAGE CONSENT FOR ML - 91

Excel Dynamic Solutions Pty Ltd confirms herewith our appointment by Manger Mining (Pty) Ltd as an accredited agent to assist with the application for the renewal of their Environmental Clearance Certificate for Mining License 91. The application for renewal was initially launched/submitted to the Ministry of Environment, Forestry and Tourism in June 2022 under the APP – 0010317 (Verification email attached).

This application was resubmitted to the Ministry in November 2022 under the APP – 00498 (Verification email attached), due to technical issues experienced by the MEFT online portal system. This application has been inaccessible to our team on the portal, and we have been requested to launch a new submission online. However, the re-launched applications all have different requirements from the initial submission we made; and include a Scoping Report and a Heritage/Archaeology Consent.

We have carried out continuous environmental audits for this project (proof of last audit submission to MEFT attached), and have not, up to now observed any concerns regarding heritage/archaeology. The MEFT has not provided us with an explanation to the changes made to the requirements, after the application was initially submitted with requirements which were fulfilled and submitted. This exercise is unfair and costly to our client who has been awaiting a response from MEFT regarding this application since June 2022.

I am kindly requesting the good office of the Environmental Commissioner to look into this matter, and consider accepting the submission of this project as per the initial requirements of the project by MEFT.

Attached herewith, are the verification emails with the initial requirements of the project, and the current requirements for comparison and consideration.

Please do not hesitate to contact our office for further information regarding this request.

Yours faithfully



**EXCEL DYNAMIC
SOLUTIONS (PTY) LTD**
Reg. No: 2019/0817
P.O. Box 997154, Maerua Mall
Tel: +264 61 259 530
Email: info@edsnamibia.com

Nerson Tjelos

Head of Projects

Cell: +264 81 152 4420

From: Ministry of Environment and Tourism <eie@met.gov.na>

Sent: Friday, June 17, 2022 4:07 PM

To: Excel Dynamic Solutions <info@edsnamibia.com>

Subject: Your application is verified



REPUBLIC OF NAMIBIA

Ministry of Environment, Forestry & Tourism

2022-06-17

Dear Excel Dynamic Solutions,

This email serves to inform you that your application **APP-0010317** has been verified

Taking the following into considerations:

- Location of the project
- Pollution potential
- Scale of operation of the project

Please upload the following documents:

- Copy of Environmental Certificate (ECC) previously Issued
- Updated EMP to effect Renewal/ Amendment

- Project Site Area (map) with clear coordinates, e.g -22.664250° 14.551275°
- Curriculum Vitae of designated EAP to manage the assessment process as per Regulation 3 & 4
- Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007)

Please login onto our portal to upload required documents, if any
<https://eia.met.gov.na>

Thank you

Phillip Troskie Bulding

P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

Please do not reply directly to this email. It was sent from an unattended mailbox. Correspondences can be done on the portal or please use

eia@met.gov.na

From: Ministry of Environment and Tourism [<mailto:noreply@meft.gov.na>]

Sent: Tuesday, November 29, 2022 9:32 AM

To: Excel Dynamic Solution Pty Ltd <ear@edsnamibia.com>

Subject: Your application is verified



REPUBLIC OF NAMIBIA
Ministry of Environment, Forestry & Tourism

2022-11-29

Dear Excel Dynamic Solution Pty Ltd,

This email serves to inform you that your application **APP-00498** has been verified

Taking the following into considerations:

- Location of the project
- Pollution potential
- Scale of operation of the project

Please upload the following documents:

- Consent letter or support doc from relevant Authority
- Updated EMP to effect amendment
- Environmental Monitoring Report (EMR)
- Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007)

- Preliminary Site Map with coordinates (decimal degrees) and a Legend
- Copy of the previous Environmental Clearance Certificate issued in terms of Section 37(1)(a) of EMA
- CV of Environmental Assessment Practitioner (EAP)
- Consent from the National Heritage Council for protection of archaeological artefacts, paleontological and rare geological specimens, meteorites and any other object which holds cultural significance

Please login onto our portal to upload required documents, if any
<https://eia.met.gov.na>

NB- for the purpose of Section 38 of the Environmental Management Act, 2007 read with Regulation 4(d), kindly forward copies of all relevant documents i.e (application forms, EIA, Scoping reports, EMP etc) to the office of the Environmental Commissioner

Thank you

Phillip Troskie Bulding

P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

Please do not reply directly to this email. It was sent from an unattended mailbox. Correspondences can be done on the portal or please use

eia@met.gov.na

From: Ministry of Environment and Tourism [<mailto:noreply@meft.gov.na>]

Sent: Saturday, 4 March 2023 6:56 am

To: Excel Dynamic Solutions <eiaonly@edsnamibia.com>

Subject: Your application is verified



REPUBLIC OF NAMIBIA
Ministry of Environment, Forestry & Tourism

2023-03-04

Dear Excel Dynamic Solutions ,

This email serves to inform you that your application **APP-001086** has been verified

Taking the following into considerations:

- Location of the project
- Pollution potential
- Scale of operation of the project

Please upload the following documents:

- Scoping Report
- EMP
- Consent letter or support doc from relevant Authority
- Proof of Consultation (Minutes, Newspaper adverts, etc)

- Confirmation of screening notice received (through email) in terms of assessment procedures (Section 35 (1)(a)(b) of the Environmental Management Act, No 7 of 2007)
- Preliminary Site Map with coordinates (decimal degrees) and a Legend
- CV of Environmental Assessment Practitioner (EAP)
- Consent from the National Heritage Council for protection of archaeological artefacts, paleontological and rare geological specimens, meteorites and any other object which holds cultural significance

Please login onto our portal to upload required documents, if any
<https://eia.met.gov.na>

NB- for the purpose of Section 38 of the Environmental Management Act, 2007 read with Regulation 4(d), kindly forward copies of all relevant documents i.e (application forms, EIA, Scoping reports, EMP etc) to the office of the Environmental Commissioner

Thank you

Phillip Troskie Bulding
P/Bag 13306, Windhoek | Tel: +264 61 284 2111 | DEA: +264 61 284 2701

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eia@met.gov.na

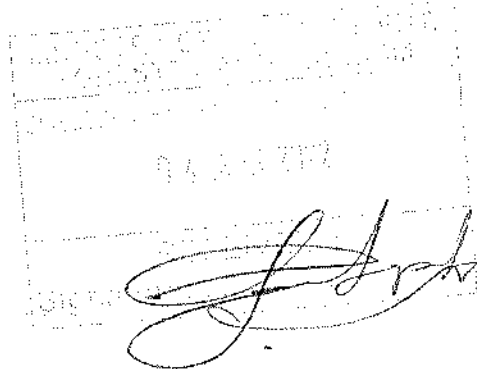


Excel Dynamic Solutions
(PTY) Ltd

Reg. 2019/0817

31 March 2022

The Environmental Commissioner
Department of Environmental Affairs
Ministry of Environment and Tourism
Private Bag 13306
Windhoek



Attention: Mr. Timoteus Mufeti

Dear Sir

SUBMISSION: BI-ANNUAL ENVIRONMENTAL AUDIT REPORT FOR MINING LICENSE (ML) NO. 91 NEAR USAKOS IN THE KARIBIB DISTRICT, ERONGO REGION, NAMIBIA.

Excel Dynamic Solutions (Pty) Ltd was appointed by Manger Mining (Pty) Ltd to prepare and submit the bi-annual environmental audit report for the Mining Licence No. 91 located near Usakos in the Erongo Region.

The audit report has been prepared according to the findings of the Scoping Report and the Environmental Management Plan for which an Environmental Clearance Certificate was granted in March 2019. For the purpose of this submission, the bi-annual environmental audit report, as per the requirements of the granted Environmental Clearance Certificate (ECC), is attached.

Please do not hesitate to contact us should you need further information.

Yours faithfully

Nerson Tjelos

Head of Projects

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122 Robert Mugabe Avenue, Windhoek Central
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