

**ENVIRONMENTAL IMPACT ASSESSMENT FOR MINERAL EXPLORATION  
ACTIVITIES ON EPL 8375 IN THE SKELETON COAST, KUNENE REGION.**



**MAY 2022**

**PREPARED FOR GRAVITY MINING CC**

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## EXECUTIVE SUMMARY

### 1. Introduction

#### 1.1 Overview

Exploration aims to discover deposits of minerals and rocks that can be used to meet the resource needs of society, such as industrial raw materials (limestone, sulphur), ores (copper, iron and zinc), gemstones (diamonds), and solid fuels (oil, coal and uranium) (White, 2005). Gravity Mining cc (proponent), would like to explore in the Skeleton Coast Park area, Kunene region. The proponent appointed Namib – Enviro Consultants to undertake the environmental impact assessment in order to obtain an Environmental Clearance Certificate for the activities from the office of Environmental Commissioner in the Ministry Of Environment, Forestry and Tourism. . This project will provide employment and contribute to the Namibian economy through foreign currency exchange. In addition the proponent also depend on mining for self-sustenance.

#### 1.2 Project location

The Skeleton Coast National Park<sup>1</sup> is Namibia's northernmost coastline protected region, bordering on Dorob NP in the south and Iona NP in Angola in the north. The park covers 16,390 square kilometres and is 500 kilometres long and 30 kilometres wide in the north and 40 kilometres wide in the south. The proposed site is located between Huab River in the north and Ugab River in the south, within the areas of Toscanini (figure 1), southwest of Khorixas, and its geographical coordinates are - 21.105489 and 13.673969.

#### 1.3 Environmental Assessment Requirements

Any large scale project must undergo an Environmental Impact Assessment in accordance with the Environmental Management Act, Act 7 of 2007, the Environmental Impact Assessment Regulation (Government Gazette No. 30 February 2012), and Namibia's environmental assessment policy of 1995. As a result, in compliance with regulation 6 of the 2012 environmental regulations, an environmental clearance certificate must be requested for. The environmental proponent shall perform a public consultation process, create an environmental scoping study, and submit an Environmental Management Plan for the planned mineral exploration activities in accordance with regulation 21 of the 2012 environmental procedure.

#### 1.4 Project alternatives

A processing alternative would be considered whereby the proposed project opt for drilling boreholes instead of desalination or abstraction of water in the water sources in the surroundings, and use of solar power energy or generators instead of a new electricity grind.

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## 1. Introduction

### 1.1 Project background

Exploration aims to discover deposits of minerals and rocks that can be used to meet the resource needs of society, such as industrial raw materials (limestone, sulphur), ores (copper, iron and zinc), gemstones (diamonds), and solid fuels (oil, coal and uranium) (White, 2005). Gravity Mining cc (proponent), would like to explore the Khorixas linens in the Skeleton Coast Park area, Kunene region. The proponent appointed Namib – Enviro Consultants to undertake the environmental impact assessment in order to obtain an Environmental Clearance Certificate for the activities from the office of Environmental Commissioner in the Ministry Of Environment, Forestry and Tourism.

#### 1.1.1 Mineral licence tenure

#### 1.1.2 Environmental consultant

The proponent appointed Namib – Enviro Consultants to undertake the environmental impact assessment in order to obtain an Environmental Clearance Certificate for the activities from the office of Environmental Commissioner in the Ministry Of Environment, Forestry and Tourism.

#### 1.1.3 Proponent of the proposed project

The proposed of exploration activities exclusive prospecting licence belongs to Gravity Mining cc.

### 1.2 Project location

The Skeleton Coast National Park<sup>1</sup> is Namibia's northernmost coastline protected region, bordering on Dorob NP in the south and Iona NP in Angola in the north. The park covers 16,390 square kilometres and is 500 kilometres long and 30 kilometres wide in the north and 40 kilometres wide in the south. The proposed site is located between Huab River in the north and Ugab River in the south, within the areas of Toscanini (figure 1), southwest of Khorixas, and its geographical coordinates are - 21.105489 and 13.673969.

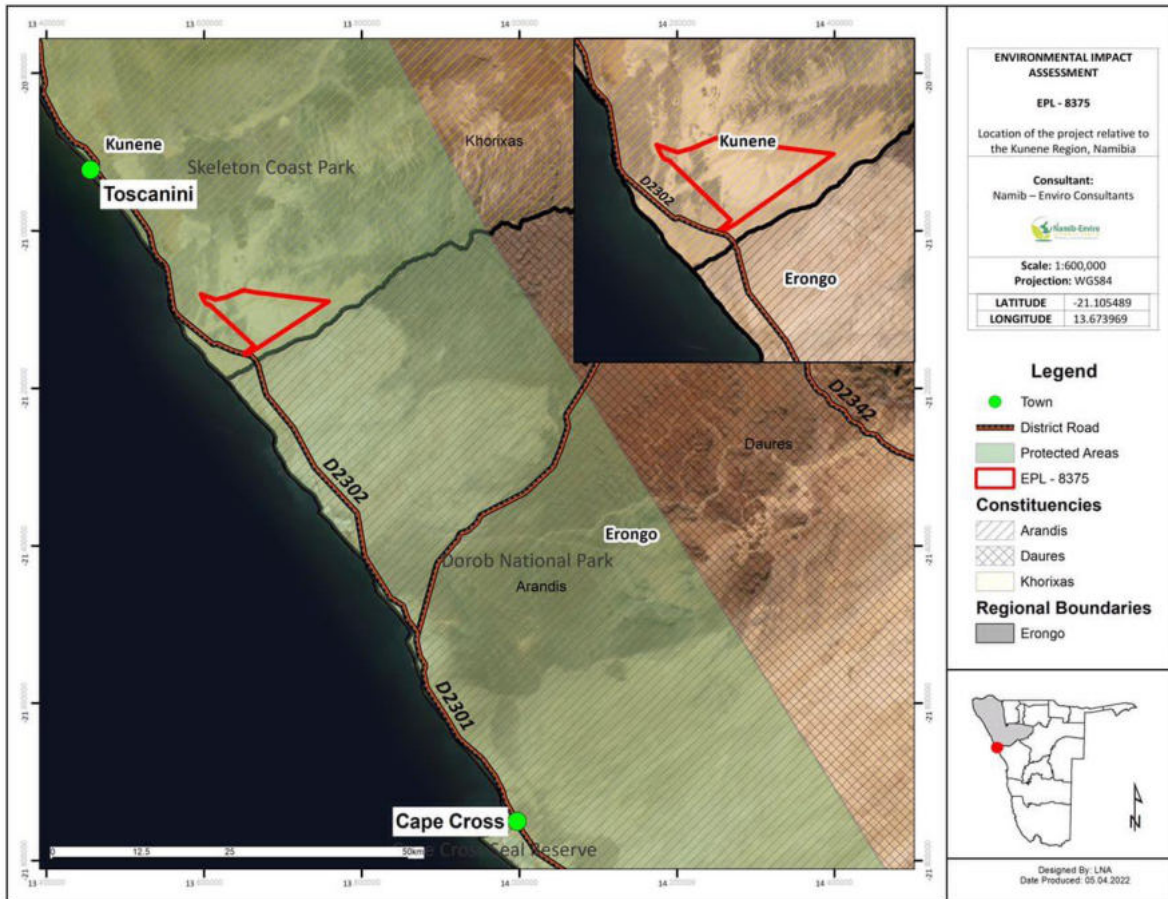


Figure 1 Location of EPL 8375

### 1.3 Infrastructure and services

#### 1.3.1 Electricity

Exploration process normally require less power, therefore the power required to undertake the activities will be catered by the proponents own generator.

#### 1.3.2 Water supply

The water required will be minor, and will be utilised mainly for domestic purposes: consumption and cleaning. The proponent will drill borehole within the exploration site to supply water.

#### 1.3.3 Roads

Since there are currently no suitable roads, the conservancy administration will demarcate access to the exploration sites.

#### 1.3.4 Storage of lubrication and consumables

All the hydrocarbons will be stored in a removable tanks/containers in a demarcated section of one of the temporary waste storage areas, and they will be removed from the site regularly to ensure that the temporary tanks is not full,



### 1.3.5 Buildings

Exploration camp will be set up and precautions will be taken to prevent the spreading of generated wastes of all kinds on and from the camping site.

### 1.3.6 Refuse and waste removal

Generated wastes will be stored in containers and collected on a regular basis and disposed off at a recognised disposal facility. In addition, temporary sanitary facilities will be provided by the proponent, and remove all generated wastes from the exploration site.

### 1.3.7 Security and fencing

No provision has been made for fencing off the camping facility, although strict access to and from the exploration site will be facilitated by personnel.

### 1.3.7 IT systems and communication

Telephones or other form of electronic communications will be made available on site in case of emergencies, and for effective communication.

## 1.4 Environmental impact assessment requirements

Any large scale project must undergo an Environmental Impact Assessment in accordance with the Environmental Management Act, Act 7 of 2007, the Environmental Impact Assessment Regulation (Government Gazette No. 30 February 2012), and Namibia's environmental assessment policy of 1995.

## 1.5 Purpose of the scoping report

The project's scope is confined to conducting an Environmental Impacts Assessment and filing for an Environmental Clearance Certificate for the exploration activities to be conducted. The scoping process identifies the issues that are likely to be most important during the EIA and eliminates those that are of little concern. The scoping process shall be concluded with the establishment of terms of reference for the preparation of an EIA, as set out by the Ministry of Environment and tourism. The purpose of this scoping report is to:

- Identify any important environmental issues to be considered before commencing with mineral exploration activities on the proposed mineral exploration sites.
- To identify appropriate time and space boundaries of the EIA study.
- To identify information required for decision-making.

As such, the key objectives of this scoping study are to:

- Inform the public about the proposed mineral exploration activities.
- Identify the main stakeholders, their comments and concerns.

- Define reasonable and practical alternatives to the proposal.
- To establish the terms of reference for an EIA study.

## 1.6 Terms of reference

### 1.6.1 Environmental approach and methodology

The approach and methodology will be guided by the Environmental Regulations of 2012 and the Terms of Reference which will be provided by the proponent.

### 1.6.2 List of specialist studies undertaken

It is a norm to disclose all the tasks to be undertaken as part of the assessment process, including any specialist to be included if need be as stipulated in section 9(a) of the environmental regulations of 2012. At this juncture, the exploration project has not commenced yet, this implies that currently no field specific specialist studies were commissioned by the proponent, however a full environmental impact assessment will be conducted out with appropriate site-specific specialist studies on groundwater, air-quality, fauna, flora, archaeology and avifauna as exploration commences.

## 1.7 Need and desirability

### 1.7.1 Need of the exploration project

The exploration project could help Namibia achieve some of the objectives outlined in National Development Plans including the Fifth National Development Plan (NDP5) and the Harambee Prosperity Plan (HPP). The project will employ individuals from the local towns and communities throughout the exploratory phase. If the exploratory project results in the finding of a commercially viable mineral deposit, a mine could be built in the area. A mine can make a substantial contribution to the social and economic development of the town.

## 2. Summary of applicable legislation

Table 1 Summary of legal framework relevant to mining in Namibian parks

<b>Legislation/Policies</b>	<b>Relevant Provisions</b>
<b>The Constitution of the Republic of Namibia as Amended</b>	<p>Article 91 (c) provides for duty to guard against “the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia.”</p> <p>Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country’s natural resources.</p>
<b>Environmental Management Act No. 7 of 2007 (EMA)</b>	Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management
<b>Mineral policy 2004</b>	Section 2.2.3 deals with prospecting and mining in protected areas and states that: “Emphasis is placed on the government to ensure that mining does not jeopardise the potential for long-term sustainable development in tourism.
<b>The Minerals Prospecting and Mining Act of 1992</b>	The Minerals Prospecting and Mining Act No.33 of 1992 approves and regulates mineral rights in relation to exploration, reconnaissance, prospecting, small scale mining, mineral exploration, large-scale mining and transfers of mineral licenses.
<b>EIA Regulations GN 28, 29, and 30 of EMA (2012)</b>	<p>GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate.</p> <p>GN 30 provides the regulations governing the environmental assessment (EA) process.</p>
<b>Nature conservation ordinance, ordinance No. 4 of 1975</b>	The Nature Ordinance 4 of 1975 covers game parks and nature reserves, the hunting and protection of wild animals (including reptiles and wild birds), problem animals, fish, and the protection of indigenous plants.
<b>Public and Environmental Health Act, 2015</b>	Provide a framework for a structured uniform public and environmental health system in Namibia; and to provide for incidental matters.

<b>Atmospheric Pollution Prevention Ordinance 11 of 1976</b>	Provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, with the exception of East Caprivi, is proclaimed as a controlled area for the purposes of section 4(1) (a) of the ordinance.
<b>Hazardous Substance Ordinance, No. 14 of 1974</b>	Provides for the control of toxic substances. It covers manufacture, sale, use, disposal and dumping as well as import and export.
<b>National Heritage Act, 2004 (Act No. 27 of 2004)</b>	Act provides for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.
<b>Water Resources Management Act of 2004</b>	Provides for the management, protection, development, usage and conservation of water resources; to provide for the regulation and monitoring of water resources and to provide for incidental matters.
<b>Water Act No. 54 of 1956</b>	Section 23(1) deals with the prohibition of pollution of underground and surface water bodies.
<b>Labor Act no 11 of 2007</b>	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.

### 3. Description of the proposed exploration project

#### 3.1 Introduction

Mineral exploitation in Namibia is a substantial industry that employs a huge number of people and contributes significantly to the national economy. When it comes to minerals, Namibia is well-diversified. Because mineral rights are vested in the state, the government of Namibia is the regulating agency for all minerals being exploited (Mansfeld, 2006). In Namibia, there are various alternatives for exploration or mining, and several application channels must be followed in order to comply with the legislation (MIT, 2003).

After South Africa, Ghana, Tanzania, Zimbabwe, and Zambia, Namibia's mining sector is the sixth largest in Africa. Minerals account for roughly 15% of Namibia's GDP, the sector is the largest contributor to the country's GDP, and mining products account for up to 50% of Namibia's yearly export revenues. The mining industry directly employs about 10,000 people (Bendi, 2003).

The proposed project will contribute to the Namibian economy and improve people's livelihood within the project location as the proponent intend to hire roughly seven local people, including two management employees at the initial phase of the project. All personnel will go through a safety orientation, a first-aid course, and a wildlife awareness program. The Labour Act of 2007 will be followed at all times

#### 3.2 Techniques for mineral exploration

According to Hentschel, Hruschka, & Priester (2002), several approaches will be used by geoscientists during the exploration process to discover acceptable areas and assess the depth and shape of the ore deposit. Among them are:

- Creating and reviewing geological maps. Geologic maps show the locations of different types of bedrock (bedrock is the rock that is closest to the surface), give exploration geologists hints as to what geologic processes acted in a given area and suggest how rocks are distributed at depth. Maps help geologists compare an area with other sites that have yielded highly concentrated ores in the past.
- Visiting a potential mine site and completing field studies, which might entail additional geological mapping, surface rock sampling, and/or chemical analyses of rock, soil, and water samples.
- Performing “non-invasive” studies to obtain underground information. These studies are similar to someone using a metal detector to find discarded coins on a beach. The

larger-scale geophysical studies used by mining companies may include seismic, gravity, magnetic, or other surveys.

- Drilling down through the surface to obtain samples at depth. Hollow drills are used that bring cores (long cylinders of rock) to the surface.

For this proposed exploitations techniques are yet to be identified.

### 3.2.1 Labour requirement

For the initial phase of the project, the proponent plans to hire roughly seven people, including two management employees. Employees will be recruited from the local community, and nearby residents. All personnel will go through a safety orientation, a first-aid course, and a wildlife awareness program. The Labour Act of 2007 will be followed at all times

## 4. Description of the current environment

### 4.1 Introduction

This subsection tries to describe the current state of the environment, the potential impact of planned modifications, and ongoing monitoring to detect environmental changes. Minerals abundant in the Skeleton Coast National Park, including diamonds and other gems. The Atlantic Ocean, with sandy and pebble beaches, sand dunes, ephemeral riverbeds and canyons to rugged canyons with walls of richly coloured volcanic rock and extensive mountain ranges (Hutton & Palfi, 2003).

The Skeleton Coast National Park is a major section of this magnificent complex of protected areas, comprising ecological and geographical characteristics of the Northern Namib Desert. The park has a high level of biodiversity that is important on a national, regional, and worldwide scale. The Northern Sand Sea, other dune fields of the park, and the littoral zone have high levels of speciation and endemism in lichens and vascular plants, a highly diverse avifauna and an unusual assemblage of large mammals for such a hyper-arid park, and unique invertebrate diversity, but there are a number of other species or groups of species that are also very important. From north to south, communal conservancies Marienfluss, Orupembe, Sanitatas, Okondjombo, Puros, Sesfontein, Torra, Doro!nawas, and the Palmwag tourism concession area share the park's whole eastern border. The land to the east of the park is zoned and maintained to protect animals (MEFT, 2021).

The Skeleton Coast National Park is bordered on the west by the Atlantic Ocean, with the cold Benguela current bringing a wealth of marine life. Most tourists are unable to access the shoreline, which is littered with shipwrecks. The desert ecosystem is sustained by natural springs, whereas the huge Kunene River is an annual river that defines the northern boundary with Angola. In the park, the Hoarusib, Ugab, and Uniab rivers are also major living systems (MET, 2007).

### 4.2 Climate conditions

#### 4.2.1 Temperature

According to the Management plan for Skeleton Coast Park of 202, the Namib Desert's coastal climate is mostly affected by the cold Benguela Current and the South Atlantic Anticyclone. Temperatures are generally moderate (average minimum and maximum temperatures reflect a range of around 7 to 32 °C during the coldest and hottest months, respectively), and fog is

common (about 125 days per year on the coast dropping to about 40 days per year 80 km inland). June is the coldest month of the year, with an average night time temperature of 20°C.

#### 4.2.2 Precipitation

The park as a whole falls below the 100 mm isohyet, and much of it falls below the 50 mm isohyet. Aside from the unusually low yearly rainfall, the rainfall is also exceedingly erratic, with annual coefficients of variation ranging from 80 percent to over 100 percent on average. The park has an average water deficit of roughly 2 m per year due to high evaporation rates and minimal rainfall. The rainy season is from January through March. In the Namib Desert, the importance of fog as a source of water is well-known, and many species rely on and have evolved to fog water usage and harvesting.

#### 4.2.3 Wind

The wind blows almost continuously. The southwest wind blows an average of 300 days/annum at up to 60 km/h, and peaks in the early summer months from October to December. Due to the hilly terrain, the Khorixas area is vulnerable to unpredictable winds and significant variations despite short distances. These winds push the Benguela Current northward, transporting sand from the beach to nearby land and causing upwelling along the coast, bringing nutrient-rich waters to the surface.

#### 4.2.4 Humidity

The humidity is observed to be >80% during most months, and is significantly lower at 75% during the summer months. Because the cool, dry air cannot rise high enough over the coast to produce genuine rain clouds, precipitation frequently condenses primarily as fog and low clouds. Fog occurs 75 to 100 days per year with mornings and evenings being the most common times. The Kunene shore gets about 5 to 6 hours of sun every day on average.

#### 4.3 Air quality

Emissions and dust from automobiles traveling on gravel roads, and wind erosion from exposed places are all possible sources of air pollution in the area. It was observed that the air quality in proposed area is good.

#### 4.4 Geology

The geology is clearly apparent. Time and nature have fashioned a sand and rock dreamscape. Mica schists, gneiss, and granites date back over a billion years. The SCNP's Damara Super group granites and gneisses form the deep root zone of a north-south-trending Alpine-type mountain belt that formed 550 million years ago during continental collision and



amalgamation, resulting in the formation of Gondwana, the southwestern part of the old supercontinent Pangaea. Terrace Bay still has the remnants of previous lava flows. Today, roaring dunes, clay castles, and beaches gleam with wind-polished stones can be found.

#### 4.5 Hydrogeology and water resources

Several springs provide vital water to coastal areas, allowing large creatures to travel further west than they might otherwise. The majority of springs are generated by water being forced to the surface along faults in the underlying rock formations, although other springs are formed by water being driven to the surface along faults in the underlying rock formations. The Kunene River's mouth provides a critical habitat for a variety of birds, fish, turtles, and other species.

#### 4.6 Flora, fauna and avifauna

##### 4.6 Fauna

The fauna of the Skeleton Coast Park has become specially adapted to the unique and severe physiological characteristics of the area. Whilst some species are endangered or even on the Red Date Species list and that reason are protected, all species in the park deserve full protection as they have managed to adapt to this extremely hostile environment.

##### 4.6.1 Invertebrates and vertebrates

It is known that the dune fields in the park hold a number of endemic *Tenebrionid* beetles, scorpions and arachnids. Regarding reptiles, the desert plated lizard *Gerrhosaurus skoogi* deserves special mention. Endemic to the Northern Namib this species is the dominant lizard species inhabiting the dune systems of the Northern Namib and dune slip faces in particular. Mammals in the fog zone of the Namib Desert include permanent residents such as the conspicuous oryx (*Oryx gazella*), springbok (*Antidorcas marsupialis*), black-backed jackal (*Canis mesomelas*), brown hyena (*Hyaena brunnea*), and the Cape fur seal (*Arctocephalus pusillus*), in addition to the several small burrowing mammals such as gerbils (*Gerbillus* spp.) and whistling rats. The other mammal species are largely seasonal or occasional residents. The park supports a small population of African lions (*Panthera leo*) that are adapted to the harsh hyper-arid conditions.

##### 4.6.2 Avifauna

In total, 314 bird species have been recorded in the park, accounting for 46.7 percent of Namibia's total number of indigenous bird species. The condition of the Damara Tern, which is essentially endemic to Namibia and breeds in summer on broad sandy or gravel plains, interdune valleys, and salt pans, is of special concern among the park's bird species. There are 21

red Data Species among them. As shown in Table 2, three of those species are highly endangered, while the remaining ten are vulnerable.

Table 2 Red Data Species occurring in the Skeleton Coast Park (MEFT, 2021)

Common name	Scientific name	Red Data Status
Jackass Penguin	<i>Spheniscus demersus</i>	Critically endangered
Great Crested Grebe	<i>Podiceps cristatus</i>	Critically endangered
White Pelican	<i>Pelecanus onocrotalus</i>	Endangered
Cape Gannet	<i>Morus capensis</i>	Endangered
Crowned Cormorant	<i>Phalacrocorax coronatus</i>	Endangered
Black Stock	<i>Ciconia nigra</i>	Endangered
Marabou Stork	<i>Leptoptilos crumeniferus</i>	Vulnerable
Glossy Ibis	<i>Plegadis falcinellus</i>	Vulnerable
Greater Flamingo	<i>Phoenicopterus ruber</i>	Endangered
Lesser Flamingo	<i>Phoeniconaias minor</i>	Endangered
Egyptian Vulture	<i>Neophron percnopterus</i>	Critically endangered
Tawny Eagle	<i>Aquila rapax</i>	Vulnerable
Bateleur	<i>Terathopius ecaudatus</i>	Endangered
African Fish Eagle	<i>Haliaeetus vocifer</i>	Vulnerable
Martial Eagle	<i>Polemaetus bellicosus</i>	Vulnerable
African Black Oystercatcher	<i>Haematopus moquini</i>	Vulnerable
Chestnut Banded Plover	<i>Charadrius pallidus</i>	Vulnerable
Hartlaub's Gull	<i>Larus hartlaubii</i>	Vulnerable
Caspian Tern	<i>Hydroprogne caspia</i>	Vulnerable

Swift Tern	<i>Sterna bergii</i>	Vulnerable
Damara Tern	<i>Sterna balaenarum</i>	Endangered

#### 4.7 Flora

Plants in Skeleton National Park have adapted to survive by acquiring, retaining, and storing atmospheric moisture through a variety of creative adaptations. Succulents, grasses riverine growth, and lichens are among them, as are colonies of *Welwitschia mirabilis*, whose distribution in Namibia is centered in the southern part of the park, as well as the northern Dorob NP; *Acanthosicyos horridus* (! Nara); and succulents, grasses riverine growth, and lichens.

The park thus holds 32.2% of the 174 known lichen species recorded in Namibia. *W. mirabilis* is one of the few endemic and also keystone plant species that has been extensively mapped in the park. Another important Namib Desert plant endemic is the !nara *Acanthosicyos horridus* that is never very abundant but widely distributed in Skeleton Coast NP along dry riverbeds and dune fields including the Kunene Sand Sea.

Table 3 A table showing some plant species which occur in the

<b>Endemic to the area</b>
<i>Hermbstaedtia spathulifolia</i>
<i>Euphorbia pergracilis</i>
<i>Euphorbia rimireptans</i>
<i>Indigofera anabibensis</i>
<i>Asystasia welwitschia</i>
<i>Blepharis ferox</i>
<i>Crassothonna agaatbergensis</i>
<i>Acanthosicyos horridus</i>
<i>Welwitschia mirabilis</i>
<i>Acanthosicyos horridus</i>

<b>Protected species</b>
<i>Acacia erioloba</i>
<i>Sterculia Africana</i>
<i>Boscia albitrunca</i>
<i>Albizia anthelmintica</i>
<b>Other notable species</b>
<i>Sarcocaulon mossamendense</i>
<i>Adenia pechuelii</i>
<i>Arthroaerua leubnitziae</i>
<i>Salsola nollothensis</i>
<i>Stipagrotis ramulosa</i>
<i>Eragrotis cyperoides</i>
<i>Brachiaria psammophila</i>
<i>Tamarix usneoides</i>
<i>Colophospermum mopane</i>
<i>Combretum imberbe</i>
<i>Salvado persica</i>
<i>Faidherbia albida</i>
<i>Balantines welwitschii</i>
<i>Typha capensis</i>
<i>Phragmites australis</i>
<i>Schoenopletus littoralis</i>
<i>Teloschistes capensis</i>

*Santessonia hereroensis*

*Caloplca indurata*

*Xanthoparmelia spp.*

*Parmelia hueana*

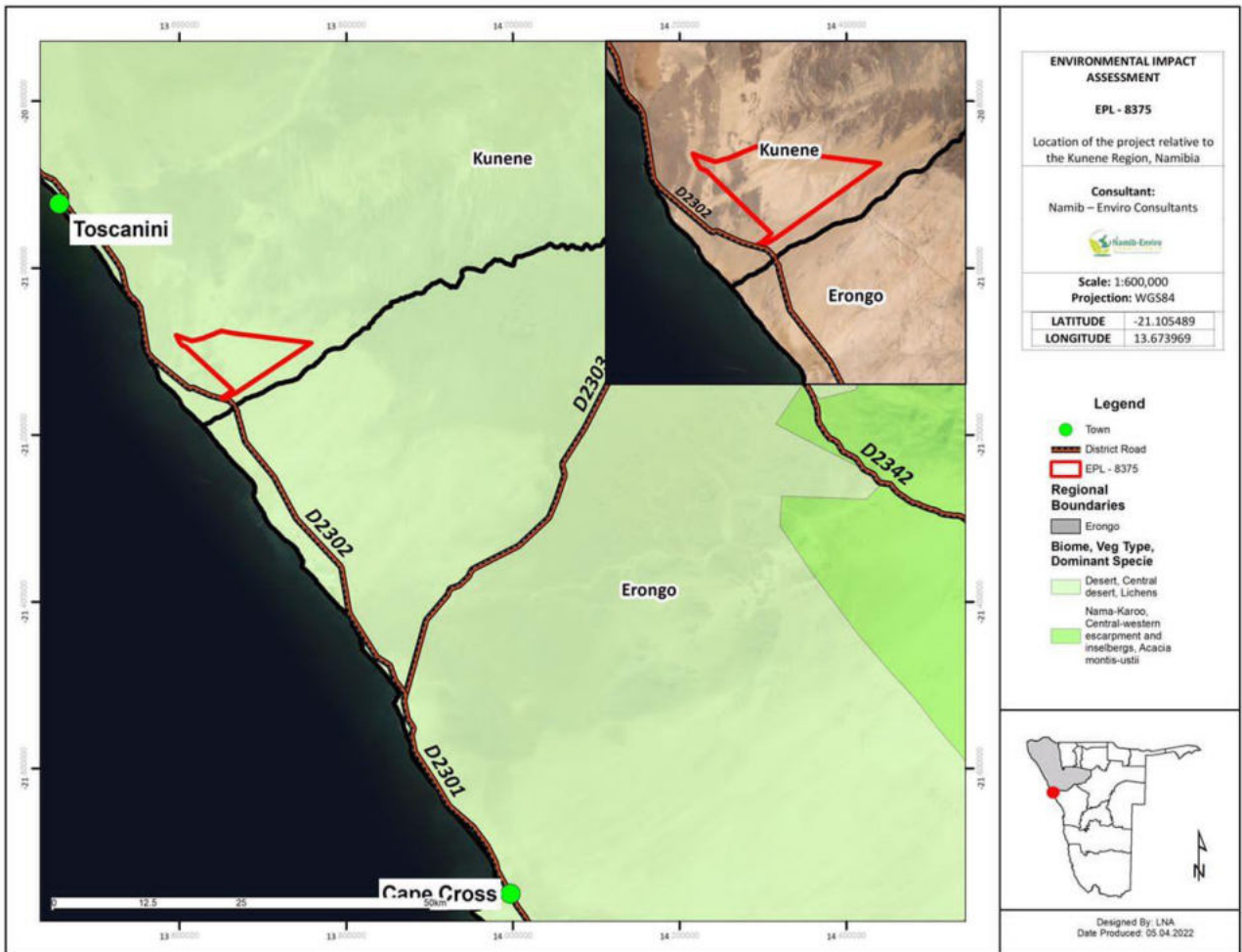


Figure 2 Vegetation type of the dominant species

#### 4.7 Archaeology and heritage sites

The park has a rich archaeological and historical history. A settlement on the Ugab River with whale bone shelters is a one-of-a-kind sight in southern Africa. Historical artifacts abound along the shore from the Sechumib River to roughly 80 kilometers north of Angra Fria. This section of coast is filled with the wreckage of 500-year-old sailing ships. Recent wreck surveys along this coast have revealed that this area is historically significant (MEFT, 2018).

According to Mansfeld (2006), while many archaeological sites have been discovered along the Namibian coast, some of which provide evidence of long-term coastal occupation, many of these are regarded as "lucky finds," because the chances of artefacts surviving long enough to be discovered are extremely poor. As a result, there are just a few known archaeological sites with exceedingly old artefacts. At this time, it is unknown whether the exploration will yield any significant archaeological finds; however, an incidental find strategy may be required. Work must be suspended immediately if any heritage or culturally significant artefacts are discovered during construction, and the Namibian National Heritage Council must be notified.

#### 4.8 Socio-economic environment

Currently accounts for a significant amount of Namibia's GDP, and tourism is only second in terms of economic importance to mining. However, tourism generates a small amount of revenue along the Kunene coast. Coastal Kunene could undoubtedly earn much more with smart, bold planning, enhancing the livelihoods of people in the region while also preserving the coast's stunning and pristine ecosystem (Mendelsohn, Jarvis, Roger, & Roberstson, 2012). Agriculture is unviable due to insufficient water and soil fertility. Because of the high-energy character of the coast, aquaculture has limited potential, and considerable development of recreational line fishing would be unsustainable because these coastal waters serve as breeding sites for many species that eventually migrate as adults to other parts of Namibia's coast.

#### 4.10 Soils

The presence of three types of very fragile soil surface layers or crusts, which cover a substantial portion of the park and are very vulnerable to disturbance, is one factor to note here that is of high value to park management.

##### 1.10.1 Abiotic soil crusts

Abiotic soil crusts result from evaporation exceeding precipitation in arid environments. Gypsum on the plains and salt on the pans and at water seepages are the two most common soil crusts in the park (and generally saline soils with variable degrees of salt crust formation in many places in the Central Namib).

##### 1.10.2 Biological soil crusts

Lichens, mosses, green algae, micro-fungi, and cyanobacteria form biological soil crusts, which combine soil particles into a crust. Small crustose lichens and algae are connected with coarse sand and gravels in large portions of the park, although biological soil crusts are not known to be present in the form of the more thick and defined lichen fields found in

neighbouring Dorob NP. On alluvial fan deposits next to the Hoarusib, Khumib, and Sechumib Rivers and their historic tributaries, and on hillsides along the eastern edge of the Skeleton Coast Park, lichen-dominated soil crusts ranging from thick and diversified communities can be found.

### 1.10.3 Desert pavement

A large portion of the park is made up of gravel plains that represent an ancient Pleistocene erosion platform that hasn't been altered by anything other than in-situ wind erosion and chemical accretion and deposition, mostly from marine and fog sources, and in fact several successive erosion platforms. The third extremely sensitive feature of the Skeleton Coast NP substrates are ancient gravel and pebble<sup>13</sup> deposits that represent an ancient landscape of Pleistocene age (up to 2.7 million years old) and represent an ancient landscape of Pleistocene age (up to 2.7 million years).

## 5. Assessment of impacts

### 5.1 Introduction

The goal of this section on impact assessments is to identify and examine the most important environmental implications from mineral exploration activities on EPL 8375, as well as feasible mitigation actions. If mineral exploration activities are discontinued in the future, an EIA will be required to address the resulting environmental impacts. This section also includes mitigation measures for the identified impacts.

### 5.2 Impact assessment methodology

The magnitude and temporal and spatial scales of the project, as well as the specific activities involved with the project, are used to determine the significance of an impact. At all times, the evaluation of the environmental effects of development operations should attempt to be objective and unbiased. Environmental activities, on the other hand, are vulnerable to the subjectivity that comes with attempting to quantify significance. The significance of an effect is determined by the context (spatial and temporal scale) as well as the strength of that impact.

Table 4 Assessment methodology used to examine the impacts identified

Criteria	Category	Description
Criteria for ranking Spatial impact	National	Beyond a 10 Km radius of the site
	Regional	Within a 5 Km radius of the centre of the site
	Local	Within a 2 Km radius of the the centre of the site
	Site specific	On site or within the boundaries of the property
	Zero	
Criteria for ranking the magnitute of impacts	High	Natural and/ or social functions and/ or processes are severely altered
	Medium	Natural and/ or social functions and/ or processes are notably altered
	Low	Natural and/ or social functions and/ or processes are slightly altered



	Very low	Natural and/ or social functions and/ or processes are negligibly altered
	Zero	Natural and/ or social functions and/ or processes remain unaltered
Criteria for ranking the duration of impact	Zero	Zero time
	Short term	Up to 18 months
	Medium term	0-5 years (after operation)
	Long term	5- 10 years (after operation)
	Permanent	More than 10 years (after operation)
Probability	Definite	Estimated greater than 95 % chance of the impact occurring
	Very likely	Estimated 50 to 95% chance of the impact Occurring
	Fairly likely	Estimated 5 to 50 % chance of the impact Occurring
	Unlikely	Estimated less than 5 % chance of the impact occurring
	Zero	Definitely no chance of occurrence
Confidence	Certain	Wealth of information on and sound understanding of the environmental factors potentially influencing the impact
	Sure	Reasonable amount of useful information on and relatively sound understanding of the environmental factors potentially influencing the impact
	Unsure	Limited useful information on and understanding of the environmental factors potentially influencing this impact
Reversibility	Irreversible	The activity will lead to an impact that is permanent

	Reversible	The impact is reversible, within a period of 10 years.
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### 5.3 Overall socio-economic benefits and issues

Table 5 Summary of socio-economic impacts and their evaluation

Impacts Benefits and issues	Measurement	Rating	Mitigation
<b>Socio-economic benefits</b> The project has great potential to improve livelihoods and contribute to sustainable development within the surrounding community.	Duration Extent Magnitude Probability Reversible	Long and short-term Site specific & local Low Very likely Reversibility	Employ local labour as far as possible Establish on the job training and other capacity development training programs
<b>Potential Direct Benefits</b> <ul style="list-style-type: none"> <li>- Capital investment</li> <li>- Training programs offered by the proponent will permanently benefit staff members.</li> <li>- The surrounding community will benefit from the project during the on-going phase.</li> </ul>	Duration Extent Magnitude Probability Reversible	Long and short-term Site specific & Local Medium Very likely Reversibility	Employ local labour as far as possible Establish on the job training and other capacity development training programs
<b>Potential Indirect Benefits</b> General enhancement of the health conditions and quality of life for a few people in the surrounding settlements.	Duration Extent Magnitude Probability Reversible	Short-term Site specific & Local Low Fairly likely Reversibility	Employ local labour as far as possible Establish on the job training and other capacity development training programs

<b>General socio-economic concerns</b> <ul style="list-style-type: none"> <li>- As the number of employees and contractors moving in and out of the area expands, so does the chance of HIV/AIDS spreading.</li> <li>- Increased migration of individuals to the area in search of job possibilities during the mineral exploration project's target generation and drilling phase; and</li> <li>- Increased informal settlement and accompanying difficulties.</li> </ul>	Duration	Short-term	Establish on the job training and other capacity development training programs
	Extent	Site specific, Local & National High	
	Magnitude	Very likely Irreversibility	
	Probability Reversible		

#### 5.4 Mineral Exploration phases and associated issues

Exploration phases	associated issues
<b>Mapping and Geochemical Sampling Phase of the Project</b>	
<b>Dust</b>	Fall out dust settling on vegetation is likely to cause local disruptions in herbivorous and predatory complexes and should be minimized as far as possible
<b>Noise</b>	Disturbs or scare animals that inhabited in the proposed exploration surrounding areas
<b>Safety and Security</b>	Possibility of injuries during mapping and sampling
<b>Visual</b>	Accidental diversion off of routes and aesthetic damage to the landscape
<b>Drilling Phase of the Project</b>	
<b>Air quality</b>	Vehicle movement may cause less dust. However, when appropriately controlled, will be likely to have little effects.
<b>Fire and Explosion Hazard</b>	Long term environmental impacts

<b>Generation of Waste</b>	Littering the surrounding areas if wastes are not appropriately disposed.
<b>Health and Safety</b>	Can cause serious health and safety risks to workers on site.
<b>Fauna</b>	Disturbances to the environment will result in the loss or change in behavior of fauna
<b>Vegetation</b>	Disturbances to the environment will result in the loss or change in behavior of flora
<b>Avifauna</b>	Causes immigration of endemic birds
<b>Heritage Impacts</b>	All archaeological remains are protected under the National Heritage Act (2004) and will not be destroyed, disturbed, or removed.
<b>Groundwater Impacts</b>	<ul style="list-style-type: none"> <li>- Exploration activities may affect the availability of water and the quality thereof</li> <li>- Surface water for animals may be affected as well</li> </ul>

## 6. Environmental management plan

### 6.1 Overview

Conducting an environmental assessment prior to engaging in an activity such as mining or exploration is one means of anticipating future environmental repercussions and creating ways to avoid or minimize them. Prior to prospecting or mining a specific location, it is usual practice to have an environmental management plan in place. It's crucial to have a well-structured, all-encompassing plan in place, as well as an environmental management system put up by a certified environmental consultant to assist management in making responsible and realistic decisions. Each on-site employee should be given a simplified explanation of the EMP's needs at the start of exploratory activities. Employees must be informed that they are required to follow this plan when this paper is issued.

### 6.2 Environmental management principles

Everyone will be expected to conduct all of their activities in an environmentally and socially responsible manner. This includes all consultants, contractors, and subcontractors, as well as transport drivers, visitors, and anybody else involved in the mineral exploration project who enters the exploration regions. Protect project staff and the general public's health and safety from the project's potential consequences. This covers road safety, on-site protection from natural risks, and radiation concerns. Environmental resource management and conservation that takes into account the needs of current and future generations Prevent contamination of the air, water, and soil, and conserve biodiversity.

### 6.3 Impacts on the bio-physical environment

Table 6 Possible effects on the bio-physical environment, mitigation measures, and their monitoring methods

Impacts	Mitigation measures	Monitoring methods
<b>Impacts on Archaeological Sites</b>	<ul style="list-style-type: none"><li>- Buffer zones will be created around the sites.</li><li>- Adhere to practical guidelines provided by an archaeologist to reduce the archaeological impact of mineral exploration activities.</li></ul>	An archaeologist will inspect any identified archaeological sites before commencing with the mineral exploration activities.

	<ul style="list-style-type: none"> <li>- All archaeological sites to be identified and protected before further exploration commences.</li> <li>- Notices/information boards will be placed on sites.</li> <li>- Training employees regarding the protection of these sites.</li> </ul>	
<p><b>Impacts on Fauna</b></p>	<ul style="list-style-type: none"> <li>- Some habitat areas such as trees of the riverbeds and tunnels outcrops will be avoided wherever possible.</li> <li>- A fauna survey will be conducted to determine the effect of fragmented habitat on game species should the need arise.</li> <li>- No animals shall be killed, captured or harmed in any way.</li> <li>- No foodstuff will be left lying around as these will attract animals which might result in human-animal conflict.</li> <li>- Care will be taken to ensure that no litter is lying around as these may end up being ingested by wild animals</li> <li>- No animals shall be fed. This allows animals to lose their natural fear of humans,</li> </ul>	<p>Regular monitoring of any unusual signs of animal habitat.</p>

	which may result in dangerous encounters.	
<b>Impact on Vegetation</b>	<ul style="list-style-type: none"> <li>- Environmental considerations will always be adhered to before clearing roads, trenching and excavating.</li> <li>- Paths and roads will be aligned to avoid root zones. Permeable materials will be used wherever possible.</li> <li>- The movement of vehicles in riverbeds, rocky outcrops and vegetation sensitive areas will be avoided.</li> <li>- The movement of vehicles will be restricted to certain tracks only.</li> <li>- Areas with species of concern will be avoided.</li> <li>- Ministry of Environment and Tourism will be informed of any protected species which will be transplanted in consultation with MET.</li> </ul>	Environmental education awareness, and regular monitoring of any unusual signs of animal habitat.
<b>Impacts on Socio-Economic</b>	<ul style="list-style-type: none"> <li>- The population change can be mitigated by employing people from the local community and encouraging the contractors to employ local individuals.</li> </ul>	Public meetings will be held by the proponent whenever necessary.

	<ul style="list-style-type: none"> <li>- The perception of risks will be mitigated by putting up safety signs wherever possible and ensuring that all employees and visitors to the site undergo a safety induction course.</li> </ul>	
<b>Visual Impacts</b>	Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating.	Employees will be trained on the importance of minimizing visual impacts.
<b>Generation of Solid Waste</b>	Commit to the management of solid waste life cycle by all the employees and contractors of the site.	Transportation of solid waste to a registered site for disposal.
<b>Noise</b>	Disturbance to fauna that roam the area will be minimized by training the employees on ways to minimize noise.	Restriction duration of noise pollution.
<b>Air quality</b>	<ul style="list-style-type: none"> <li>- All staff on should be equipped with dosimeters that measure exposure levels to radiation.</li> <li>- All staff must be made aware of the health risk and obliged to wear dust masks.</li> </ul>	

6.4 Table 7 Summary of Environmental Management Plan during the phases of the project

<b>CONSTRUCTION PHASE</b>			
<b>Environmental impacts</b>	<b>Proposed mitigation measures</b>	<b>Responsibility</b>	<b>Monitoring plan</b>



<b>Solid waste</b>	<ul style="list-style-type: none"> <li>- Any debris should be collected by a waste collection company</li> <li>- If trenches are dug, waste should be re-used or backfilled.</li> <li>- The site should have waste receptacles with bulk storage facilities at convenient points to prevent littering during exploration.</li> </ul>	Management	Presence of well-Maintained receptacles and central collection point.
<b>Oil leaks and spills</b>	<ul style="list-style-type: none"> <li>- Vehicles and equipment should be well maintained to prevent oil leaks.</li> <li>- Contractor should have a designated area where maintenance is carried out and that is protected from rainwater.</li> </ul>	Proponent	No oil spills and leaks on the site
<b>Visual</b>	<ul style="list-style-type: none"> <li>- Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating.</li> </ul>	Management	Employees will be trained on the importance of minimizing visual impacts.
<b>Archaeological Sites</b>	<ul style="list-style-type: none"> <li>- Adhere to practical guidelines provided by an archaeologist to reduce the archaeological impact of mineral exploration activities.</li> </ul>	Management	

	<ul style="list-style-type: none"> <li>- All archaeological sites to be identified and protected before further exploration commences.</li> </ul>		
<b>Air pollution</b>	<ul style="list-style-type: none"> <li>- Maintenance of vehicles and equipment.</li> <li>- Control speed and operation of construction vehicles.</li> <li>- Prohibit idling of vehicles.</li> <li>- Workers should be provided with dust masks if working in sensitive areas.</li> </ul>	Site manager	Control amount of dust produced
<b>Noise pollution</b>	<ul style="list-style-type: none"> <li>- Field work should only be carried out only during daytime at a specific time.</li> <li>- Workers should wear earmuffs if working in noisy section.</li> <li>- Management to ensure that noise is kept within reasonable levels.</li> </ul>	Proponent and management	Control amount of noise
<b>Soil pollution</b>	<ul style="list-style-type: none"> <li>- Clearly mark/demarcate vehicle routes.</li> <li>- No worker should ever drive off road, but to stick to the demarcated routes.</li> </ul>	Project coordinator Management and park warden	Proper planning and management
<b>Flora</b>	<ul style="list-style-type: none"> <li>- Care should be taken to avoid/minimize destruction of endemic and Red Data Species.</li> </ul>	Management and proponent	Warning signs on site and restored vegetation

	<ul style="list-style-type: none"> <li>- A geologist should be consulted with respect to the viability of moving the trench to avoid destruction of fragile species.</li> </ul>		
<b>Fauna</b>	<ul style="list-style-type: none"> <li>- Some habitat areas such as trees of the riverbeds and tunnels outcrops will be avoided wherever possible.</li> <li>- A fauna survey will be conducted to determine the effect of fragmented habitat on game species should the need arise.</li> <li>- No animals shall be killed, captured or harmed in any way.</li> <li>- No food will be left lying around as these will attract animals which might result in human-animal conflict</li> </ul>	Management	Regular monitoring of any unusual signs of animal habitat.
<b>Occupational Health and Safety</b>	<ul style="list-style-type: none"> <li>- Provide Personal Protective Equipment Train workers on personal safety and how to handle equipment and machines.</li> <li>- A well-stocked first aid kit shall be maintained by qualified personnel.</li> <li>- Provide sufficient and suitable sanitary conveniences which should be kept clean.</li> </ul>	Proponent	<ul style="list-style-type: none"> <li>- Workers using protective equipment.</li> <li>- Presence of Well stocked first aid kit.</li> <li>- Clean sanitary facilities.</li> </ul>

**OPERATIONAL PHASE**

<p><b>Oil leaks and spills</b></p>	<ul style="list-style-type: none"> <li>- Impervious PVC sheets should be deployed as flooring and covered with sand to absorb spillages</li> <li>- Should spillages occur, contaminated sand needs to be removed and stored in a drum, to be later removed to an approved disposal site</li> </ul>	<p>Proponent</p>	<p>No oil spills and leaks on the site.</p>
<p><b>Solid waste</b></p>	<ul style="list-style-type: none"> <li>- Under no conditions should any waste be buried or burned at the site</li> <li>- Minimize solid waste generated on site.</li> <li>- Waste to be deposited at a demarcated waste site in the park or if it needs to be removed to designated sites outside the park</li> </ul>	<p>Proponent Management</p>	<p>Presence of well-Maintained receptacles and central collection point.</p>
<p><b>Visual</b></p>	<ul style="list-style-type: none"> <li>- Environmental considerations will be adhered to at all times before clearing roads, trenching and excavating.</li> <li>- Siting of roads should avoid the traversing of tops of ridges and always use of existed roads rather than creating new ones.</li> <li>- Erected infrastructure should be sited in depressions not on hill tops or rises and should not be</li> </ul>	<p>Park wardens and Management</p>	<p>Employees will be trained on the importance of minimizing visual impacts.</p>

	visible from any major tourist roads lookout points.		
<b>Archaeological Sites</b>	<ul style="list-style-type: none"> <li>- Adhere to practical guidelines provided by an archaeologist to reduce the archaeological impact of mineral exploration activities.</li> <li>- Should any item of interest be located, all activities need to cease immediately at that location, and notify the National Monuments Council.</li> </ul>	Management	Update Register of all archaeological sites identified.
<b>Noise pollution</b>	<ul style="list-style-type: none"> <li>- Workers to wear earmuffs if working in noisy section</li> <li>- Management to ensure that noise is kept within reasonable levels.</li> </ul>	Proponent Management	Control amount of noise
<b>Soil pollution</b>	<ul style="list-style-type: none"> <li>- The top soil needs to be removed and stockpiled</li> <li>- Stockpiled soil must be covered to prevent it from being windblown within three months</li> <li>- All hydro-carbon products need to be stored in a bunded area, to avoid any accidental spillages.</li> </ul>	Project coordinator Management and park warden	Proper planning and management
<b>Flora</b>	<ul style="list-style-type: none"> <li>- Care should be taken to avoid/minimize destruction of endemic and Red Data Species.</li> <li>- A geologist should be consulted with respect to the viability of moving the</li> </ul>	Management and contractor	Warning signs on site and restored vegetation

	trench to avoid destruction of fragile species.		
<b>Fauna</b>	<ul style="list-style-type: none"> <li>- Strict employee's code of conduct including prohibition of hunting or trapping or interfering in any manner with any wild animals.</li> <li>- No feeding of wild animals should be allowed.</li> <li>- Litter should be prevented and adequately disposed of to prevent attracting scavenging wild animals.</li> </ul>	Management	Regular monitoring of any unusual signs of wild animal habitat.
<b>Environment Health and Safety</b>	<ul style="list-style-type: none"> <li>- Train workers on personal safety and disaster preparedness.</li> <li>- A well-stocked first aid kit shall be maintained by qualified personnel.</li> <li>- Report any accidents / incidences and treat and compensate affected workers.</li> <li>- Provide sufficient and suitable sanitary conveniences which should be kept clean.</li> <li>- Conduct Annual Health and Safety Audits.</li> </ul>	Management	Provide sanitary facilities.
<b>Fire preparedness</b>	<ul style="list-style-type: none"> <li>- Firefighting emergency response plan.</li> </ul>	Management	- Proof of inspection on

	<ul style="list-style-type: none"> <li>- Ensure all firefighting equipment are regularly maintained, serviced and inspected.</li> <li>- Fire hazard signs and directions to emergency exit, route to follow and assembly point in case of any fire incidence.</li> </ul>		<p>firefighting equipment</p> <ul style="list-style-type: none"> <li>- Fire Signs put up in strategic places.</li> <li>- Availability of firefighting equipment.</li> </ul>
<b>DECOMMISSIONING PHASE</b>			
<b>Solid waste</b>	<ul style="list-style-type: none"> <li>- Solid waste should be collected by a contracted waste collection company</li> <li>- Excavation waste should be re-used or backfilled.</li> </ul>	Proponent and Management	<p>Amount of waste on Site.</p> <p>Presence of well-maintained receptacles and central collection point</p>
<b>Noise &amp; Air pollution</b>	<ul style="list-style-type: none"> <li>- Maintain plant equipment.</li> <li>- Decommissioning works to be carried out only during daytime.</li> <li>- Workers working in noisy section to wear earmuffs.</li> <li>- Workers should be provided with dust masks.</li> </ul>	Proponent and Management	Amount of noise

<b>Soil pollution</b>	<ul style="list-style-type: none"> <li>- The contaminated soil needs to be treated either by adding bacteria which break down spilled hydrocarbon, or by simply distributing the soil thinly in direct sunlight to naturally break down the hydrocarbons.</li> </ul>	Proponent	
<b>Disturbed Physical environment</b>	<ul style="list-style-type: none"> <li>- Undertake a complete environmental restoration program and introducing appropriate vegetation</li> </ul>	Management	Management
<b>Occupational Health and Safety</b>	<ul style="list-style-type: none"> <li>- Provide Personal Protective Equipment.</li> <li>- Train workers on personal safety and how to handle equipment and machines.</li> <li>- A well-stocked first aid kit shall be maintained by qualified personnel.</li> <li>- Demarcate area under decommissioning.</li> </ul>	Proponent	<ul style="list-style-type: none"> <li>- Workers using Protective Equipment.</li> <li>- Presence of a First Aid Box.</li> </ul>
<b>Visual pollution</b>	<ul style="list-style-type: none"> <li>- Rake the track or drag tyres to smooth tracks</li> <li>- Removal of all construction equipment, surplus material and temporary structures, fences and works of every kind, and</li> </ul>		Rehabilitation of every foreign material at the site



	everything that was brought at the site.		
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## 6.5 Monitoring, Auditing and Reporting

### 6.5.1 Inspections and Audits

Performance against the EMP commitments will need to be reviewed throughout the project's life cycle, with corrective action implemented as needed, to guarantee compliance with the EMP and any Enviro-legal obligations. This will include conducting both the internal inspections/audits and external audits, documentation, reporting, establishing an environmental management systems, adhere to the drafted environmental policy, maintain the impact aspect register, drafting procedures and method statements by the relevant responsible mineral exploration staff and contractors, determining the relevant roles and responsibilities, and others.

Internal compliance monitoring will be implemented in the following manner:

- a) All contractors will be subjected to project kick-off and close-out audits. This applies to all phases of the process, including drilling contract work:
  - Before a contractor begins work, the applicable phase site manager will perform an audit to confirm that the EMP commitments are reflected in the contractor's standard operating procedures (SOPs) and method statements.
  - After a contractor's work is completed, the applicable phase site manager will conduct a final close-out audit of the contractor's performance against the EMP commitments.
- b) During the construction/initial and decommissioning phases, monthly internal EMP performance audits will be conducted.

### 6.5.2 Roles and responsibilities for environmental management

#### 6.5.2.1 Communication between Parties

Emphasis will be put towards open communication between all parties, in order to reach a proactive approach towards potential environmental issues deriving from the project. This approach should guarantee that environmental impacts are anticipated and prevented, or minimised, rather than adopting a negative “policing” approach after negative impacts have already occurred. The importance of a proactive approach cannot be overemphasised, particularly in relation to preventing unnecessary tracks, and damage to vegetation (i.e. protected and endemic species) as these impacts cannot easily be remedied.

#### 6.5.2.2 The Operating Company

The company is ultimately responsible for all stages of the project and the impacts resulting from those activities. The responsible persons will be the company's Environmental Control Officer (ECO) and Managing Director to ensure that:

- The EMP and its environmental specifications are included in contractual documents and it is required that contractors, and subcontractors, consultants etc. do meet the EMP requirements;
- The company and all its subcontractors, consultants etc. comply with all Namibian legislation and policies and any relevant International Conventions;
- Compliance with the environmental specifications are enforced on a day-to-day basis;
- Environmental audits are conducted periodically by a suitably qualified ECO to confirm that the environmental requirements are properly understood and effectively implemented;
- Sufficient budget is provided to implement those measures that have cost implications;
- The site manager must commission tree surveys well in advance of planned road construction or drill pad preparation so that the necessary site visits by forestry personnel and forestry permits are acquired; and,
- Open an effective communication between all parties concerning environmental management on the project.

#### 6.5.2.3 Site managers

Day-to-day responsibility for environmental management will be assigned to the ECO and Manager Field Operations site manager for the duration of all operational activities to:

- Be familiar with the contents of the EMP and applicable sections of the EIA and the measures recommended therein;
- Monitor compliance with the environmental specifications on a daily basis and enforce the environmental compliance on site by communicating the ECO's directions to all personnel involved;
- In the event of any infringements leading to environmental damage, personnel need to consult with the ECO and seek advice on any remedial measures to limit or rectify the damage;
- Maintain a record (photographic and written) of "before-and-after" conditions on site;
- Facilitate communication between all role players in the interests of effective environmental management.

#### 6.5.2.4 Environmental Control Officer (ECO)

KMZ Enterprises cc must appoint a suitably qualified ECO who is responsible to:

- Undertake environmental audits of overall compliance with the environmental specifications. This should be done at least bi-annually for the warehouse.
- Submit a site inspection report to the Managing Director and MFO;
- Advise the MFO on interpretation and implementation of the environmental specifications as required; and,
- Make recommendations for remedial action in cases of non-compliance with the environmental specifications.

#### 6. 5.3 Environmental Management System Framework

The proponent and its contractors will create and implement an Environmental Management System (EMS) in order to apply Environmental Management Practices. The structure for compiling a project EMS is established in this section. All environmental management paperwork will be kept in a paper and/or electronic system by the applicable exploration manager. These will be classified into the following groups:

##### **a) Policy and Performance Standards**

The EMP includes a draft environmental policy as well as accompanying objectives, targets, and pledges. These can be adjusted by the mineral explorer as needed.

##### **b) Enviro-Legal Documentation**

The proponent will always have a copy of the approved environmental assessment and EMP documents. The exploration team will also save copies of the Environment Clearance Certificate and all other related authorizations and licenses. In addition, a record of the project's applicable laws and regulations will be maintained and updated as needed.

##### **c) Impact Aspect Register**

The Aspect-Impact Register with the Project Activity is based on this Draft EMP, which specifies the foreseeable project features and related possible effects of the proposed project. It should be noted, however, that more project aspects and related affects may occur during the project's life cycle and will need to be recorded in the Aspect-Impact Register. The impact identification principles outlined in the scoping study can be utilized to update the Register in

this regard. During the project's life cycle, the applicable exploration manager can make changes to this approach as needed.

#### **d) Procedures and Method Statements**

Procedures and method statements will be drafted by the relevant accountable mineral exploration employees and Contractors in order to influence the promises included within the EMP. These may include, but are not limited to:

- Standard operating procedures for the implementation of the environmental action plan and management program.
- Procedures for dealing with incidents and emergencies.
- Procedures for auditing, monitoring, and reporting, as well as
- EMP compliance method statements for ad hoc actions not explicitly covered in the EMP action plans.

#### **e) Register of Roles and Responsibilities**

Relevant roles and duties will be identified during project planning and risk assessments. All environmental commitment duties and obligations must be documented in a register. The register must include pertinent contact information and be updated as needed.

#### **f) Site Map**

It is essential to keep an up-to-date map of the exploration site that shows all project activities. The following detail, in addition to the project layout, must be depicted:

- Material handling and storage
- Waste management (collection, storage, and transfer, among other things);
- Areas with a high level of sensitivity;
- The location of the incident and emergency equipment; and the location of the accountable parties.

#### **g) Environmental Management Schedule**

The applicable phase site managers and/or relevant Contractors must keep a schedule of environmental control actions. The exploration manager is responsible for keeping a master schedule of all such activities up to date. Environmental risk assessments, environmental management meetings, and other scheduled environmental actions include, but are not limited to:

- Handling, managing, and rehabilitating soils
- Waste removal
- Inspection and repair of incident and emergency response equipment
- Environmental education
- Participation of stakeholders; environmental inspections; and
- Auditing, monitoring, and reporting are all part of the auditing, monitoring, and reporting process.

#### **h) Change Management**

The EMS must have a change management procedure in place. In this regard, environmental documentation, procedures and method statements, action plans, and other related documents will be updated and revised as needed to account for the following scenarios:

Changes in standard operating procedures (SOPs), scope changes, ad hoc activities, project phase changes, and duties or roles changes

#### **6.6 Closure Plan**

The proposed project's closing plan is to develop a secure, stable, and non-polluting post-prospecting landscape that may support integrated, self-sustaining, and value-generating activities, leaving a positive legacy in the process. The closure plan's goals are to:

- Prioritizing the creation of a functional post-prospecting environment that allows for self-sustaining agricultural operations whenever possible.
- To promote the restoration of terrestrial and aquatic wetland biodiversity, when appropriate.

##### **6.6.1 Alternatives Considered**

Because this is an exploration project, the proposed project is not complicated, and the hazards associated with prospecting are well understood and may be mitigated once the project is completed. There are few alternatives for closure. There are just two activity possibilities for the closure plan that have been considered:

##### **First alternative:**

Closure or backfill of boreholes with overburden removed during drilling (best option).

##### **Second alternative:**

Leaving boreholes open to allow for groundwater recharge from surface run-off.

### 6.6.2 Preferred Alternative: Rehabilitation/ Backfill of boreholes

The restoration of a disturbed environment that has been deteriorated as a result of operations such as mining, road construction, or waste disposal to a land use similar to that which existed before the activity began is known as rehabilitation. This involves aesthetic concerns, so that a disturbed region does not stand out from the surrounding surroundings. Backfilling boreholes with overburden removed during development and covering with growth medium to produce vegetation is the preferred technique for preserving physical, chemical, and biological ecosystem functions in degraded environments. This option provides a number of benefits, which are listed below:

#### **Benefits:**

- The site will be pleasing to the eye
- The location will blend in with the surroundings
- The site will be a suitable habitat for fauna and flora again
- The site will be safe and pollution-free

Option 1, which is to leave boreholes unbackfilled, carries the risk of these boreholes filling with water, which could attract wildlife and communities, resulting in drowning and the possibility of getting trapped in the declines. Backfilling is required to reduce these dangers.

### 6.6.3 Closure Assumptions

This closure plan was created using the minimal information available, including environmental data. During the operational phase, some of the already accessible data may need to be enhanced. To construct the suggested closure actions, numerous assumptions were made about general conditions, as well as the closure and rehabilitation of the site's facilities. These assumptions will be examined and amended as more information becomes available during operations.

The following are some of the assumptions that were utilized to create this plan:

- Once the last intended weight of minerals has been removed from the site for laboratory testing, the closing period will begin.
- The recommended prospecting sites will be followed to the letter in order to minimize potential consequences.
- Vegetation will be established in accordance with the native vegetation of the project area.
- Water management infrastructure constructed during the operational period will be kept for closure / end of project life if needed.

- There are few chances to build infrastructure on site, and any infrastructure that is created will be of minimal utility to the community. As a result, all structures will be demolished.
- All hazardous and household garbage will be carried offsite to licensed landfills for disposal.
- Existing roads will be utilized to the greatest extent practicable. Where access tracks have been built in the absence of roads, they will be restored and closed as part of the standard closure process.

#### 6.6.4 Closure and Rehabilitation Activities

The remediation procedures that will be conducted when the projected prospecting activities reach the end of their life cycle are explained below:

##### 6.6.4.1 Infrastructure

All infrastructure will be decommissioned, and the footprints will be repaired so that vegetation can grow. To minimize any surplus materials at closure, material inventories will be maintained at the end of prospecting activities. Equipment and materials of value that aren't needed for post-closure operations will be sold or removed from the site as much as possible. Scrap and salvageable equipment will be removed from the site and sold to recyclers.

Following the completion of demolition activities, a soil contamination investigation will be carried out. The goal is to identify potential contaminated locations and then create and implement appropriate remediation methods to ensure that soil contaminants are removed. The following actions will be taken to bring the situation to a close:

- Prior to undertaking any decommissioning work, all power and water services will be disconnected and certified as safe
- All remaining inert equipment and decommissioning waste will be disposed of at the nearest licensed general waste disposal facility
- Salvageable equipment will be removed and transported offsite prior to and during decommissioning
- All tanks, pipes, and sumps containing hydrocarbons will be flushed or emptied prior to removal to ensure no hydrocarbon/c is present

##### 6.6.4.2 Boreholes

Boreholes will be backfilled with overburden stripped before prospecting activities begin. All overburden should be dumped into the vacuum, and the finished surface should be moulded to match the surrounding terrain while remaining free draining. After backfilling, a growth medium cover will be installed, and vegetation will begin to grow.

#### 6.6.4.3 Roads

- Existing roads will be utilized to the greatest extent practicable. • All signage, fences, and shade structures, as well as traffic barriers, will be removed as part of the road and parking area closure.
- All 'hard top' surfaces, as well as any concrete structures, must be ripped.
- All potentially contaminated soils must be identified and delineated for further treatment
- All haul routes treated with saline dust suppression water must be treated, with the upper surface pulled off and disposed of in authorized contaminated disposal places.

#### 6.6.4.4 Remediation of Contaminated Areas

- All hydrocarbon-containing tanks, pipes, and sumps will be flushed or emptied, and removed soils will be treated according to the nature and amount of the pollution.
- The liquid storage tanks will be drained, the structure will be removed/demolished, and the sub-surface holes will be plugged; and
- All equipment used to store or transport chemicals will be cleaned and disposed of at a proper disposal facility.

#### 6.6.4.5 Vegetation

Using non-invasive plants that meet the habitat's criteria, successful revegetation will help control erosion of soil resources, maintain soil productivity, and reduce sediment loading in streams (e.g. soils, water availability, slope and other appropriate environmental factors). Invasive species will be avoided, and the area will be managed to keep them from spreading. On slopes, naturally occurring grassland species will be planted to combat the effects of erosion. These plants will increase soil holding capacity while also lowering runoff velocity. The flat areas will be re-vegetated with the goal of establishing a long-term ecology. Before vegetation is removed, the presence of protected plant species must be identified, and the necessary licenses for destruction or relocation must be secured.

#### 6.6.4.6 Waste Management

Hazardous waste will be controlled, sorted, and disposed of, while non-hazardous garbage will be disposed of in a nearby permitted landfill site. Scrap and waste steel will be sold to recyclers. Wastes to be contained in animal-proof drums with a solid lid, and drums be in an enclosed fence, to prevent windblown debris from escaping, and scavenging animals from rummaging through the waste.



### 7. Public participation

Notification of the proposed activities were advertised in the two widely common newspaper to consult the public as presented in Appendix, to identify and contact as many potential I&APs as possible. The description of the project was presented and opportunity was given for I&APs to give their comments and issues. The registered interested and affected are indicated in the table below:

Name	Position	Organization

## 8. Conclusions

The report is prepared for the Environmental Impact Assessment for mineral exploration in the Skeleton Coast Park. The proposed site is located between Huab River in the north and Ugab River in the south, within the areas of Toscanini southwest of Khorixas, and its geographical coordinates are - 21.105489 and 13.673969.

The approach and methodology will be guided by the Environmental Regulations of 2012 and as per proponent's provisions. The project will employ individuals from the local towns and communities throughout the exploratory phase. If the exploratory project results in the finding of a commercially viable mineral deposit, a mine could be built in the area. A mine can make a substantial contribution to the social and economic development of the town.

On condition that the relevant mitigation measures are effectively implemented by the proponent, there are no environmental reasons why the proposed project should not be approved. The project will have significant positive economic impacts that would benefit the local, regional and national economy of Namibia.

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# Classifieds

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**PUBLIC NOTICE**

**ENVIRONMENTAL IMPACT ASSESSMENT FOR EXPLORATION ACTIVITIES (EPL No. 6813)**

Notice is hereby placed to inform all potentially interested and Affected Parties (I&APs) that an application for Environmental Clearance Certificate will be made to the Environmental Commissioner, in line with provisions of Environmental Management Act 7 of 2007 and its Regulations of 2012, in respect of proposed exploration activities for base metals mineral deposits:

**Project Location:** Khomas / Hardap Regions – Windhoek/Rehoboth Area  
**Proponent:** A E Ishotile Infrastructures CC

**All Interested and Affected Parties (I&APs) are invited to register and submit their comments (including request for Background Information Document) before 16th of May 2022, to:**

**Ms. Anna Neputa**  
Environmental Specialist (EAP)  
SS Consultants CC  
Cell: 081 430 4609  
Email: [admin@ssconsultants.co](mailto:admin@ssconsultants.co)

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**NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT AND REZONING OF ERF 3156, RUNDU EXTENSION 7 FROM SINGLE RESIDENTIAL WITH A DENSITY OF 1/300 TO BUSINESS WITH A BULK OF 1**

Notice is hereby given to all Interested and Affected Parties (I & APs) that an application for the Environmental Clearance Certificate will be submitted to the Environmental Commissioner in terms of the Environmental Management Act (Act No. 7 of 2007) for the following activities.

**Title:** Rezoning of Erf 3156, Rundu Extension 7 from single residential with a density of 1/300 to business with a bulk of 1.

**Proponent:** Mrs. Elizabeth Shivute

**EAP:** Green Gain Environmental Consultants cc

All I&APs are hereby invited to request background information Documents (BID) and send their comments to [eia@greengain.com.na](mailto:eia@greengain.com.na) on or before 3 June 2022.

**REZONING NOTICE:**

Notice is hereby given in terms of Regulation 10(1) of the Urban and Regional Planning Act, (Act No. 5 of 2018) that Hilaria Kevanhu under the supervision of Geraldine van Rooi, intends to apply on behalf of the registered owner of Erf 3156, Rundu Extension 7 for the:

- Rezoning of Erf 3156, Extension 7, Rundu from single residential with a density of 1/300 to business with a bulk of 1
- Consent to construct residential units
- Consent to commence with the Proposed Development whilst rezoning is ongoing.

The rezoning of Erf 3156, Extension 7, Rundu would increase the development potential of the erf and ensure that the mono-functionality of the surrounding neighbourhood is countered.

**Take note that any person objecting to the proposed rezoning as set out above may lodge such objection together with the grounds thereof with the Chief Executive Officer, Rundu Town Council, Private Bag 2128, Rundu and/or the applicant in writing within 14 working days of the publication of this notice. The last date for comments/ objections is thus 31 May 2022.**

**Applicant:**  
Hilaria Kevanhu  
P O Box 793  
Swakopmund  
Mobile: +264 81 3236024  
E-mail: [@htskevanhu@gmail.com](mailto:@htskevanhu@gmail.com)

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**ENVIRONMENTAL IMPACT ASSESSMENT FOR EXPLORATIONS ACTIVITIES BY KMZ INTERPRICES CC ON EXCLUSIVE PROSPECTIVE LICENCE (EPL 8496).**

Advanced environmental agency consultant herewith gives notice in terms of the Environmental Management Act, 7 of 2007 and Regulation 21 of the Environmental impact assessment (EIA) for the process mining activities on the above mentioned EPL NO 8496

**PROponent:** KMZ INTERPRICES CC

**DESCRIPTION OF ACTIVITY:** EXPLORATION ACTIVITIES ON DENIMENSION STONES, PRECIOUS METAL 16,4604 Ha area APPROXIMATELY.

**LOCATION OF THE ML AREA:** KHORIXA, KUNENE REGION SKELETON COAST.

Interested and Affected parties (I & AP) are invited to register with advanced environmental agency consultants for the proposed mining activities within 14 days of the advertisement.

Registration can be done by requesting of the Background information document provided in the email below. Any persons having any objection to the email below by: **26 APRIL 2022-10 MAY 2022**

Email: [info.advancenviroment@gmail.com](mailto:info.advancenviroment@gmail.com)  
Cell: 081-4801644

**ENVIRONMENTAL IMPACT ASSESSMENT FOR EXPLORATIONS ACTIVITIES GRAVITY MINING CC ON EXCLUSIVE PROSPECTIVE LICENCE (EPL 8375).**

Advanced environmental agency consultant herewith gives notice in terms of the Environmental Management Act, 7 of 2007 and Regulation 21 of the Environmental impact assessment (EIA) for the process mining activities on the above mentioned EPL NO 8375

**PROponent:** GRAVITY MINING CC

**DESCRIPTION OF ACTIVITY:** EXPLORATION ACTIVITIES ON DENIMENSION STONES, PRECIOUS METAL 16,4604 Ha area APPROXIMATELY

**LOCATION OF THE ML AREA:** KHORIXA, KUNENE REGION SKELETON COAST.

Interested and Affected parties (I & AP) are invited to register with advanced environmental agency consultants for the proposed mining activities within 14 days of the advertisement.

Registration can be done by requesting of the Background information document provided in the email below. Any persons having any objection to the email below by: **26 APRIL 2022-10 MAY 2022**

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**ENVIRONMENTAL IMPACT ASSESSMENT FOR EXPLORATIONS ACTIVITIES BY KMB TRADING CC ON EXCLUSIVE PROSPECTIVE LICENCE (EPL 8205).**

Advanced environmental agency cc consultant herewith gives notice in terms of the Environmental Management Act, 7 of 2007 and Regulation 21 of the Environmental impact assessment (EIA) for the process mining activities on the above mentioned EPL NO 8205

**PROponent:** KMB TRADING CC

**DESCRIPTION OF ACTIVITY:** EXPLORATION ACTIVITIES ON DENIMENSION STONES, PRECIOUS METAL 16,4604 Ha area APPROXIMATELY

**LOCATION OF THE ML AREA:** KHORIXA, KUNENE REGION SKELETON COAST.

Interested and Affected parties (I & AP) are invited to register with advanced environmental agency consultants for the proposed mining activities within 14 days of the advertisement.

Registration can be done by requesting of the Background information document provided in the email below by: **26 APRIL 2022-10 MAY 2022**

Email: [info.advancenviroment@gmail.com](mailto:info.advancenviroment@gmail.com)  
Cell: 081-4801644

**ENVIRONMENTAL IMPACT ASSESSMENT FOR FILLING STATIONS AT OMBINGONDO IN ROAD NO D 3089 FROM OTJINEHE GAM**

Advanced environmental agency cc consultant herewith gives notice in terms of the Environmental Management Act, 7 of 2007 and Regulation 21 of the Environmental impact assessment (EIA) for the filling stations.

**PROponent:** KMB TRADING CC

**DESCRIPTION OF ACTIVITY:** FILLING STATIONS AT OMBINGONDO IN ROAD NO D 3089 FROM OTJINEHE GAM

**LOCATION OF THE ML AREA:** OMBINGONDO, OTJINEHE OMAHEKE REGION.

Interested and Affected parties (I & AP) are invited to register with advanced environmental agency consultants for the proposed mining activities within 14 days of the advertisement.

Registration can be done by requesting of the Background information document provided in the email below. Any persons having any objection to the email below by: **26 APRIL 2022-10 MAY 2022**

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EPL NO: 8496  
PROPONENT: KMZ INTERPRICES CC

**DESCRIPTION OF ACTIVITY:** EXPLORATION ACTIVITIES ON DENMENSION STONES, PRECIOUS METAL 16, 4604 Ha area APPROXIMATELY.

**LOCATION OF THE ML AREA:** KHORIXAS, KUNENE REGION SKELETON COAST.

Interested and Affected parties (I & AP) are invited to register with advanced environmental agency consultants for the proposed mining activities within 14 days of the advertisement. Registration can be done by requesting of the Background information document provided in the email below.

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**ENVIRONMENTAL IMPACT ASSESSMENT FOR EXPLORATIONS ACTIVITIES GRAVITY MINING CC ON EXCLUSIVE PROSPECTIVE LICENCE (EPL 8375).** Advanced environmental agency consultant herewith gives notice in terms of the Environmental Management Act, 7 of 2007 and Regulation 21 of the Environmental impact assessment (EIA) for the process mining activities on the above mentioned EPL NO: 8375

PROPONENT: GRAVITY MINING CC

**DESCRIPTION OF ACTIVITY:** EXPLORATION ACTIVITIES ON DENMENSION STONES, PRECIOUS METAL 16,4604 Ha area APPROXIMATELY

**LOCATION OF THE ML AREA:** KHORIXAS, KUNENE REGION SKELETON COAST.

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