

May 2023

# Memorandum

---

**Subject: ECC RENEWAL APPLICATION APP-230522001501  
CATHRAL INVESTMENTS NINETY ONE (PTY) LTD'S  
PROPOSED SMALL SCALE MINING & PROCESSING ACTIVITIES  
AND ONGOING EXPLORATION AT THE SINCLAIR MINE ON EPL  
6545, KARAS REGION**

**Submission of the EIA Report Environmental Monitoring / Audit /  
Performance Report**

---

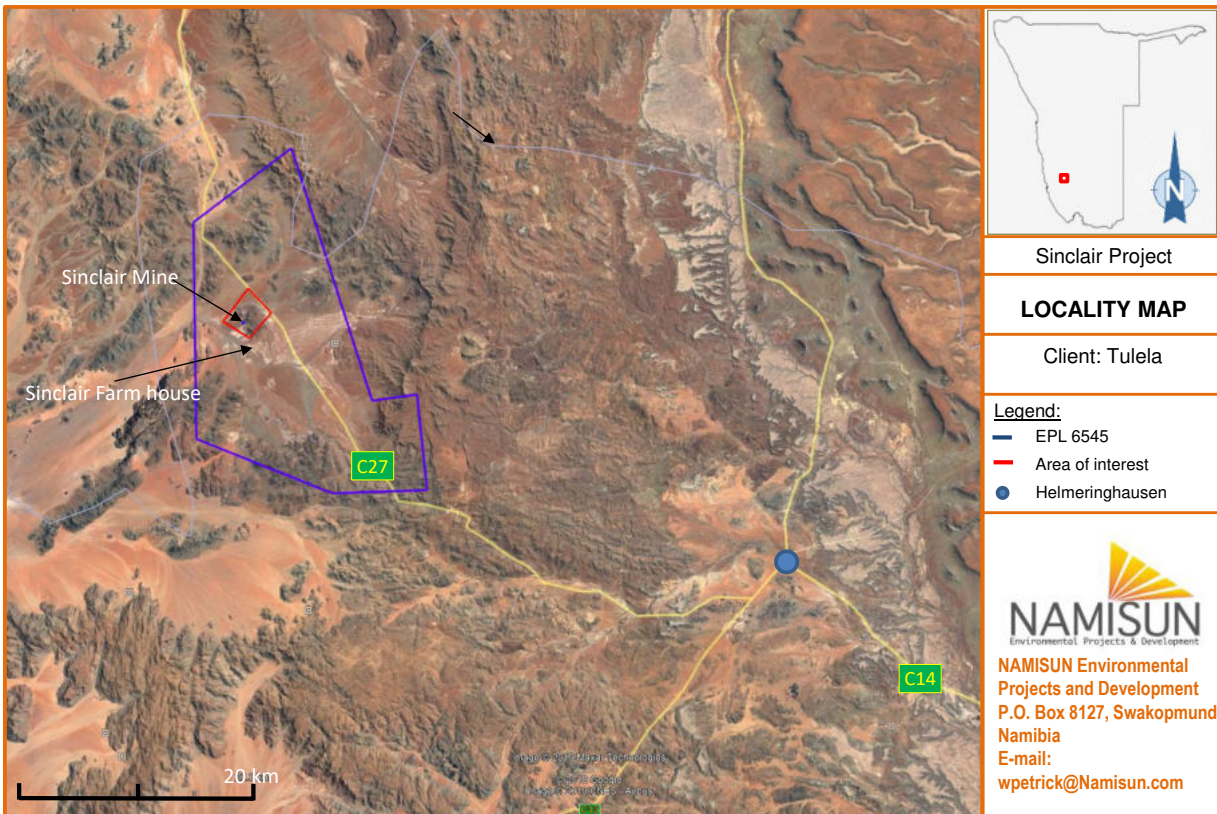
## **1. BACKGROUND**

Cathral Investments Ninety One (Pty) Ltd (i.e. Cathral Investments) holds Exclusive Prospecting License (EPL) 6545, which is located in the Lüderitz district, Karas Region approximately 50 km northwest of Helmeringhausen and 112 km south-west of Maltahohe (refer to Figure 1). EPL 6545 is approximately 34 600 hectares (ha) in size, encompassing eight privately owned farms. The C27 Road crosses roughly through the center of the EPL.

Tulela Processing Solutions (Pty) Ltd (i.e. Tulela), a wholly-owned Namibian Metallurgical and Mining company, holds majority shares in Cathral Investments. Tulela intends to recover economical minerals from the Sinclair ore body.

Cathral Investments / Tulela proposes to conduct further exploration on the EPL, within a specific area, i.e. the "area of interest", indicated in red in Figure 1. Furthermore, Cathral Investments proposes to apply for a Mining Licence (ML) from the Ministry of Mines and Energy (MME) for mining; processing of the ore and associated activities. The proposed ML area would cover a similar area to the red block (area of interest) (in Figure 1), which is approximately 863 ha in size.

This area of interest encompasses the “Sinclair Mine”, where various companies have conducted exploration and mining activities in the past. The Sinclair Mine is situated on the Sinclair Farm.



**FIGURE 1: REGIONAL LOCATION OF THE SINCLAIR PROJECT (NAMISUN, 2019)**

An Application for an Environmental Clearance for the above mentioned activities was submitted to the former Ministry of Environment and Tourism (MET) (now Ministry of Environment, Forestry and Tourism (MEFT)): Department of Environmental Affairs (DEA) in 2019. The final EIA report and Environmental Management Plan (EMP) were submitted to both MME and MEFT (DEA) in December 2019, after the successful completion of an EIA process. MEFT issued an Environmental Clearance Certificate (ECC) to Hoanib Exploration on the 27<sup>th</sup> of April 2020. The ECC has a three year validity period, which expired on the 27<sup>th</sup> of April 2023.

Cathral Investments / Tulela have conducted no exploration / mining activities since 2020 (i.e. the issuing of the ECC) due to market and economic conditions partly linked to the COVID19 pandemic, etc.

The ECC for the activities at the Sinclair mine (on EPL 6545) is therefore due for renewal and Cathral Investments / Tulela now plans to carry on with the proposed exploration activities and possible mining and associated activities, as previously described and assessed in the (original) approved EIA. It is with this background that a renewal application for the ECC is being done. Tulela appointed

Namisun Environmental Projects and Development (Namisun) to assist with the ECC renewal application.

The request for a renewal of the existing ECC is to meet the conditions of Section 57 of the Environmental Management Act of 2007 and its Regulations. Namisun assumes as part of this this letter and renewal application that the proposed continuation of the exploration, mining (and associated) activities remain similar (as previously assessed and approved), that the EMP commitments remain applicable and that all the information shared by Tulela is correct.

## **2. ENVIRONMENTAL AUDIT AND PERFORMANCE REPORT(S)**

With reference to section 1, Cathral Investments / Tulela did not conduct further exploration (or mining activities) at the Sinclair Mine and no Environmental Performance Reports (i.e. to provide feedback to the relevant Ministries on their performance against the commitments in the EMP) were compiled since the ECC was issued in 2020.

Therefore an external audit was not deemed necessary and an Environmental Performance Report was not prepared. In addition, Namisun did not conduct a recent site visit and this application is solely based on the information provided by Tulela.