



Submitted to: QKR Namibia Navachab Gold Mine (Pty) Ltd
Attention: Mr Anthony Moller
P O Box 150
Karibib
Namibia

### **I&AP COMMENTS COMPILATION:**

PUBLIC CONSULTATION FOR THE CONSTRUCTION AND OPERATION OF TAILINGS STORAGE FACILITY (TSF3) FOR QKR NAMIBIA NAVACHAB GOLD MINE, ERONGO REGION, NAMIBIA

PROJECT NUMBER: ECC-107-387-REP-16-D

REPORT VERSION: REV 01

DATE: 8 JUNE 2023





QKR Namibia Navachab Gold Mine (Pty) Ltd

#### **TITLE AND APPROVAL PAGE**

Project Name: Public consultation for the construction and operation of tailings

storage facility (TSF3) for QKR Namibia Navachab Gold Mine,

Erongo Region, Namibia

Client Company Name: QKR Namibia Navachab Gold Mine (Pty) Ltd

Client Representatives: Mr Anthony Moller

Ministry Reference: APP-002964

Authors: Monique Jarrett and Jessica Bezuidenhout

Status of Report: Draft for public review Project Number: ECC-107-387-REP-16-D

Date of issue: 8 June 2023

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### **ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:**

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### **DISCLAIMER**

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.



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### **ABBREVIATIONS**

ABBREVIATIONS	DESCRIPTION
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy
EIA	Environmental Impact Assessment
EMP	environmental management plan
ESIA	Environmental and Social Impact Assessment
I&APs	Interested and Affected Parties
MEFT	Ministry of Environment, Forestry and Tourism
ML	Mining Licence
Mm <sup>3</sup>	Million cubic metres
Pty	Propriety
TOR	terms of reference
TSF	Tailings storage facility



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# 1 SUMMARY OF PUBLIC MEETING AND COMMENTS RECEIVED FROM I&APS

### 1.1 Introduction

Environmental Compliance Consultancy (ECC) has been engaged by QKR Namibia Navachab Gold Mine (Pty) Ltd (hereafter referred to as Navahcab), the Proponent, to conduct an Environmental Impact Assessment (EIA) in accordance with the Environmental Management Act, No. 7 of 2007 and its regulations of 2012, for which an application for an environmental clearance certificate will be submitted for construction and operation of tailings storage facility three (TSF 3) within the Erongo Region, Namibia.

QKR Namibia Navachab Gold Mine (Pty) Ltd is a mining company with a portfolio of gold assets in Namibia. The Proponent is a Namibian registered company that proposes constructing and developing a 20 million cubic meters (Mm<sup>3</sup>) tailing storage facility. Navachab Gold Mine is an open pit mine located approximately 9 km outside Karibib.

### 1.2 PUBLIC MEETING SUMMARY

The public meeting was facilitated by ECCs senior practitioner, with the assistance of the Environmental assessment practitioner (EAP). The welcoming and agenda of the meeting included an introduction to ECC as an independent environmental consulting company commissioned by the Proponent Navachab as the environmental assessment practitioner (EAP) to conduct the environmental impact assessment for the Project as part of the environmental clearance certification application process for the proposed Project.

As part of the Project's introduction to the public, the following was outlined:

- Project location
- Baseline
- ESIA process and procedures

An explanation of the Project's current status was provided to the public. It was emphasized that the objective of the current public scoping meeting conducted in the early scoping phase is to engage all stakeholders and to identify further potential studies and assessments that may be required for inclusion in the environmental impact assessment of the Project.

The technical presentation by Navachab then provided an overview of the proposed construction and operation of the TSF 3 as well as the overall Project:

The presentation from ECC covered a detailed description of the public consultation purpose and intentions as part of the environmental and social impact assessment (ESIA) process for the



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processing plant. At this stage, I&APs were encouraged and informed of the importance of raising any concerns and comments related to the proposed operations of the processing plant which are to be considered in the ESIA studies and submitted along with the application for an environmental clearance certificate to the competent authorities and MEFT for a record of decision.

The main components of the environmental assessment identified for consideration in the ESIA were discussed, aspects and concerns raised which will form an important part of the impact study for the proposed Project. The current phase involves and engages I&APs to develop target-specific Terms of References (TOR) for necessary specialist studies to address all identified concerns and potential impacts in the assessment report.

### 1.3 KEY FEEDBACK ON ISSUES OF CONCERN - PUBLIC MEETING

The pool of comments received from all meetings held was provided by key stakeholders and representatives of the community. The I&APs provided useful and valuable input into the ESIA through points and comments raised during the various meetings. From the review of the recorded statements the key common theme/s of concern that was raised can be summarised as follows:

### 1.3.1 WATER POLLUTION FROM CHEMICALS USED IN THE TSF

The I&APs in attendance questioned as to whether or not chemicals will be used as part of the operations of the TSF 3. The Proponent explained that most of the chemical used during the processing of the ore is re-used in the processing plant therefor only a small concentration of the chemicals used in the processing plant are expelled to the TSF. The more dangerous of the chemicals used, that being cyanide is broken down when exposed to sunlight in the open TSF.



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### 2 ACKNOWLEDGEMENTS

In closing of the meeting ECC thanked all I&APs for their attendance and for providing valuable feedback during the public meeting. Through the public engagement process the Proponent and ECC have endeavoured to provide a platform to hear and address all relevant comments put forward by I&APs.

ECC further endorsed the fact that constructive feedback from I&APs results in a more robust and improved ESIA. This process results in a project that is understood by the community and I&APs. The I&AP's feedback will contribute to identifying the potential impacts to be assessed and concerns to be considered and addressed as the project progresses.

### 2.1 Detailed comments and responses from the public meeting

The official public consultation period began on the 13<sup>th</sup> of July 2022 and remained open until the 19<sup>th</sup> of July 2022 for initial comments. These were received during the public meeting and via email which are to be included in the scoping report. These comments and their respective responses are included in the tables below.

Further comments were welcome after that date and the public consultation period will remain open for I&APs until the final assessment report for the project is ready for submission to the competent authorities.

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Table 1 - Comments and feedback from the public meeting

28 <sup>th</sup> July 2022							
Karibib Private School Hall							
	Karibib, Erongo Region						
Stakeholder name and details	Comments/question received	Response/clarification					
Unidentified I&AP	What percentage increase in production would necessitate this TSF 3?	TSF 2 will reach its full capacity next year and then will be decommissioned and rehabilitated thus the need for the construction of TSF 3. Will be built in a valley using waste rock.					
	Where will the water come from to feed the TSF 3?	TSF 3 will be fed with a slurry mixture expelled from the ore processing plant. No additional water will be required to feed TSF 3.					
Jessica Bezuidenhout  EAP from Environmental  Compliance Consultancy (ECC)	What do you do to remove or reduce the chemicals before you pump the tailings out of the processing facility?	Several chemicals are used such as cyanide and peroxide etc, we recover about 8% of the water used and is sent back before it is sent to the TSF. So, it depends on the Cyanide contents in that 8% of water is recovered. There is also a filter plant where a dry cake is produced and is co-disposed with the waste rock. Most of the chemicals are recovered and sent back and re-used in the mine. When any excess Cyanide is released with tailings and is then exposed to sunlight is then destroyed by the sunlight. Navachab also has several monitoring boreholes to monitor on a regular basis any contamination.					
	Do you subscribe to the international cyanide	We subscribe to this standard in terms of monitoring.					
	Code for the Manufacture, Transport, and Use of Cyanide in the Production of Gold and how						



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28 <sup>th</sup> July 2022				
	Karibib Private School Hall			
	Karibib, Erongo Region			
Stakeholder name and details	Comments/question received	Response/clarification		
	does that affect monitoring?			
	How long will the construction be, as this will	Want to start with construction before the end of the		
	result in more trucks being on the road	year. Will use normal managing equipment no		
	generating more noise in the town and how	special equipment that may generate any excessive		
	much noise do you expect from this?	noise.		
Unidentified I&AP How do you prevent these chemicals from		Once the tailings are dry there is no trace of		
	entering the hydrological system?	chemicals in the dry cake anymore if any it is in very		
		minute amounts.		

Table 2 - Comments received from I&APs via email during the registration period.

Stakeholder details	Comments/question received	Response/clarification
Thomas Rathernam I particularly like to see what was provided for 1		This will be addressed in the impact assessment
	in terms of rehabilitation in the company's life	phase
X=TR Consultants	of mine plan.	
Conette Smith 1. About 1.5 km away from the border there		This matter is being addressed directly with the
	was an existing borehole on our premises	proponent as part of ongoing consultation on this
Drenam (Pty) Ltd with a depth of about 22m when we bought		topic.
	the farm in 1993. In 2005 we had to redrill	
	the borehole to 48m due to the water level	
	that went down. Five years ago, in 2017 we	
	had again to redrill that same hole to 80m.	



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Stakeholder details	Comments/question received	Response/clarification
	We think that this was due to the fact that the open pit went further down and the water table went down as well. Do you intend to go further down with the open pit and do you intend to do underground and if so will that affect the water table negatively for us?  2. How do you want to compensate us if we must drill our boreholes further down?  3. Will, you also use chemicals in your operations if you say yes, can you please provide us with a detailed list and inform us if it is hazardous in our drinking water?	
Karel Andries Esterhuizen	Interest to tender	Comment Noted.
Erongo Plant Hire/Erongo		
Road and Dust Control		
Dr Klaus Rheinschimich	I have a view concern with your waist dam so	This will be addressed in the impact assessment
	close to our farm I just want to find out if the a	phase.
Drenam Pty (Ltd)	big rainstorm comes of about 150mm in half an	
	hour will the wall of the waist dam be stable?	



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**APPENDIX A - BID** 

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### **APPENDIX B - ADVERTS PUBLISHED**



### NOTICE OF AN ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF AN ADDITIONAL TAILINGS STORAGE FACILITY, KARIBIB, ERONGO REGION, NAMIBIA.

Environmental Compliance Consultancy CC (ECC) hereby gives notice to the public that an application for an environmental clearance certificate in terms of the Environmental Management Act, No. 7 of 2007 will be made as per the following:

Applicant/ Proponent: Environmental Assessment Practitioner (EAP): Location:

QKR Namibia Navachab Gold Mine (Pty) Ltd Environmental Compliance Consultancy Erongo Region, Namibia

Project: The proposed construction of an additional Tailings Storage Facility (TSF 3) at Navachab Gold Mine, Erongo Region, Namibia.

Proposed Activities: The Proponent intends to construct a 20 Mm<sup>3</sup> Tailings Storage Facility (TSF 3) at the Navachab Gold

TSF 3 will receive residue from the Navachab Carbon-In-Pulp plant. TSF 3 will be built using the coarse fraction of tailings sands from cyclones and using non-mineralized run of mine waste rock. The area of TSF 3 will be approximately 40 to 50 ha, with one main dam of approximately 20 to 25 m in height and approximately 700 to 800 m in length.

Purpose of the review and registration period: The purpose of the review and registration period is to introduce the proposed Project and to afford registered interested and affected parties (I&APS) an opportunity to comment on the Background Information Document (BID) to ensure that all issues and concerns are brought forward, captured and considered further in the assessment.

Public meeting: A public meeting is scheduled to take place on the 28th of July 2022 at 10:00 AM in the Karibib Private School Hall, Karibib, Erongo Région.

The registration period is effective from 13 July 2022 to 29 July 2022. I&APs and stakeholders are required to register for the project at: <a href="https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-an-additional-tailings-storage-facility-tsf3-erongo-region-namibia/">https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-an-additional-tailings-storage-facility-tsf3-erongo-region-namibia/</a>

The team at ECC will then maintain contact with all registered I&APs to keep them informed and engaged as the ESIA process develops, ECC will also provide registered I&APs relevant documents to review during the assessment process.

Environmental Compliance Consultancy Registration Number: CC/2013/11404 Members: Mr JS Bezuidenhout or Mrs J Mooney PO Box 91193, Klein Windhoek Tel: +264 81 669 7608

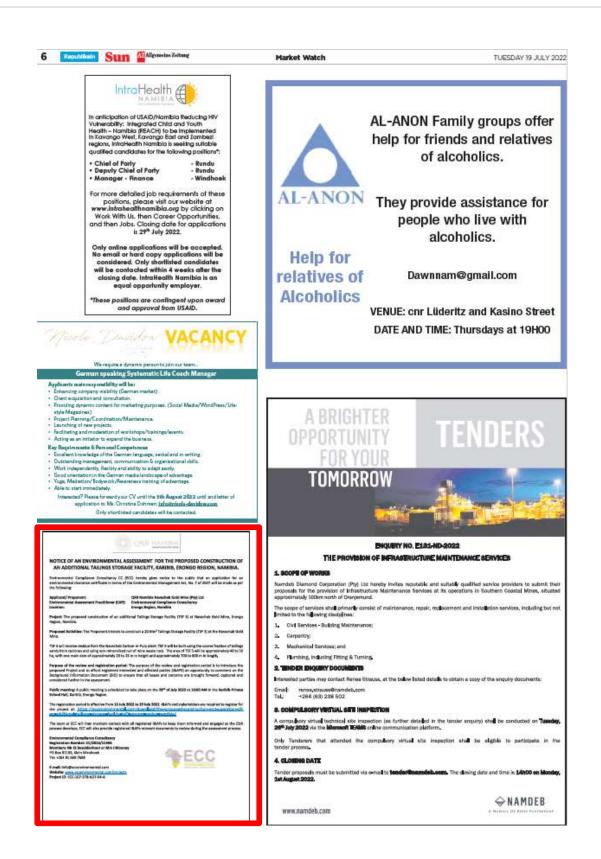
E-mail: info@eccenvironmental.com

Website: www.eccenvironmental.com/projects Project ID: ECC-107-378-ADT-04-A FECC ENVIRONMENTAL COMPUNICACION COMPUNICACI

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### **APPENDIX C - PUBLIC MEETING PRESENTATION**







### WELCOME





Presenter/s

Lester Harker and members of the ECC team.



#### **AGENDA**

- Main Objectives
- Background Information
- Environmental & Social Impact Assessment (ESIA) Process Presented by ECC
- Navachab TSF 3 Presentation Presented by Hildebrand
- Potential Biophysical & Socio-economic Impacts Presented by ECC
- Baseline Studies
- Public Participation



### **MAIN OBJECTIVES**



- Provide information describing the planned <u>Navachab</u> TSF 3 project and associated activities;
- Provide an independent environmental and social assessment of the activities associated with the proposed mining project; and
- Develop management and mitigation measures associated with any identified potential impacts where necessary.

3

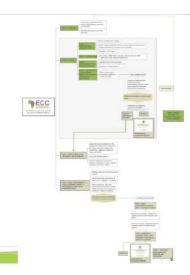
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#### **ESIA STAGES**

- Stage 1: Screening stage identification of triggered listed activities from the EMA Regulations of 2012. — Completed (APP 0010395)
- Stage 2: Scoping stage Baseline studies, public consultation commencement and developing ToR for specialist input. Develop a scoping report and EMP. In progress
- Submission of draft scoping report and EMP for public review.
- Submission of the final scoping report and draft EMP for government review.
- Stage 3 ESIA impact identification and evaluation and reporting. Next step
- Final ESIA report development with the specialist contributions.
- · Final EMP development.
- . Public review of draft ESIA report and EMP.
- Stage 4: Submission to the competent authorities (MME and MEFT)



### PROJECT REGISTRATION ON THE MEFT ONLINE PORTAL - APP 0010395



Reference #	Project	Application Date	Status	Action
APP- 0010395	The proposed construction and operation of an additional tailings storage facility (15×2) within the Econgo Region, Namibus Listed activities triggered by the project include: WASTE MANAGEMENT, TREATMENT, ANABULING AND DESPOSAL ACTIVITES 2:19 The construction of facilities for waste sites, treatment of waste and disp	05-Jul-2022	TELEMINE	♣ Submit files ⚠ Get Application ♣ Submit proof of payment

### NEWSPAPER ADVERT PUBLISHED



# PROJECT BID The proposed construction and operation of an additional tailings storage facility (TSF3), Erongo

Region, Namibia

Construction and operation of an additional tailings storage facility

QRR Hazardo Namba Gall Mine Phys Ltd propose to contract a 20 Men<sup>3</sup> fairings storage facelog (TSS), which is posted onto 10 Men softward of Salobh, Single Report New Contraction of 20 Men Million Navashold no contract operations for the most of the Physical Report Navashold (Telegraph Salobh Sa

ECC's Role

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Download Documents



Publicly Available on the ECC website

https://eccenvironmental.com/download/the-proposedconstruction-and-operation-of-an-additional-taillingsstorage-facility-tsf3-erongo-region-namibia/



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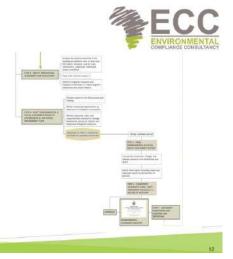


Specialist Study	Specialist Name
1. Hydrology and Geohydrology	TBC
2. Biodiversity	Peter Cunningham (Completed)
3. Noise Assessment	Airshed Planning Professionals
4. Air Quality Assessment	Airshed Planning Professionals
5. Cultural Heritage a <u>nd</u> Archaeology	Dr John Kinahan



## POTENTIAL IMPACTS TO BE ASSESSED

- Potential impacts that can arise from the proposed project include but are not limited to:
- · Water resource impacts
- · Dust Pollution
- Noise impacts
- · Biodiversity impacts
- · Impact on archaeological and cultural features
- · Employment opportunities (temporary)
- · Others....





QUESTIONS / DISCUSSION ?

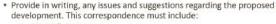
# Public consultation for the construction and operation of tailings storage facility (TSF3) for QKR Namibia Navachab Gold Mine, Erongo Region, Namibia

QKR Namibia Navachab Gold Mine (Pty) Ltd



### WHAT YOU CAN DO!





- 1. Name & Surname;
- 2. Organization represented;
- 3. Position in the organization;
- 4. Contact details and;
- Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application.
- All initial contributions, comments and concerns must be submitted by 30 August 2022.
- · Send written submissions to info@eccenvironmental.com
- · Or uploaded onto the ECC website

and the same of the same

### THANK YOU FOR YOUR TIME!





Contact Us:

Tel: +264 81 669 7608

info@eccenvironmental.com

www.eccenvironmental.com

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### **APPENDIX D - PUBLIC MEETING ATTENDANCE REGISTERS**

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1 +264816531214



Meeting Attendance Register

Date: 28-07-22

Meeting Subject: Naya Chab TSF3 ESIA

Venue: Karibib Privade School

	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	HENRY R. NARUSE	\$		03/3706032	
2	Ispskar Cowasel			0814190607	Cowal
3	Milka Awases	~		0812079480	GACUSTS
5	Rauna Seibes	/		08/2511505	7. Selve
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7	Bianca Footscher		Polox 67 Kanbib	(064)550109	B. Goelsol
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QKR Namibia Navachab Gold Mine (Pty) Ltd

Date: 25/97/22



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Meeting Subject: - Navac. 75F 3 ESIA

Venue: Karibih

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Meeting Attendance Register

Date: 28 - 07 - 22

Meeting Subject: - Navochab TSF 3 ESIA

Venue: Karibib Private School

	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
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5	Jacky Ganuses	1		0547750599	Confes
7	John Kauhanda	RILL WHOS PROLING	A kauhandaj@gmail.com	081 704 86 87	100
3	Hidra Karasi	D-A.C	akasar 4 @gmail Com	0816899633	Karan:
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11	Elara Soboles		elarescooks475@gmail.com	0817388048	E Smaches



QKR Namibia Navachab Gold Mine (Pty) Ltd

Date: 28 - 07 - 22

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Meeting Attendance Register

NAME

2

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Meeting Subject: - Navachab TSF 3 ESIA

Venue: Karubia Private School

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QKR Namibia Navachab Gold Mine (Pty) Ltd

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Meeting Attendance	Register		
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Meeting Subject: Navachab 7573 ESIA

Venue: Karibib Privale School

Date: <u>C8 | 07 | 2022</u>

	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	beling Gurings			0814389462	Dogueras
2	Niomoka Kazenah	mue		0818286321	Niomolka
3	Celensia Endiele			082525980	s=nols-
4	Matter Prayporte			0877927432	MAD
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5	Storcey Goros			05/15/132770	woll
7	Heldrid Seibs			0813005688	Beibe
8	Rhenada Horases			08/6069/94	Blooker
9	Traccy Jikua			0814096706	TAKUS
10	Kindy Seibes		selvent og vograllen	0818222020	Tiles
11	Paral Rega	oludent	irmanueta e mait booi @gmail	087190990	WA-:
12	Shiree Reules			0817649585	Seules



QKR Namibia Navachab Gold Mine (Pty) Ltd

Date: 28-07 - 22

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0 •264916891774	

Meeting Attendance Register

Meeting Subject: - Navachab TSF 3 ESIA

venue: Karubub Private School

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Meeting Attendance Register

Date: 28 - 09 - 28

Meeting Subject: - NaraChab TSF3 ESIA

Venue: Koulbib Private School

	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
	Louin Googs	N/A		0712 . 5-0	
	KLEP 14 - S NO-EN	11/4		08/8503600	7
	SHIMITE FILLMON	N/a	SHIVETERILLING ON DEPARTURAL FORT	0812681955	And
	ERNST SEIBEB	NA	ballo Seibeb 11@gmail.com	0812014854	Seleh
	Poulus Lukes	N/A	Paulistakas 71 Danal. Com		Likas
	Simion Il Stive En	NI	Simshiv tally gmail Com	0810334103	
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	Joel Muchillame	N/A		0813179036	Allange
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# Public consultation for the construction and operation of tailings storage facility (TSF3) for QKR Namibia Navachab Gold Mine, Erongo Region, Namibia

QKR Namibia Navachab Gold Mine (Pty) Ltd

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/lee	ting Attendance Register ting Subject: - Novacha- ue: Karib B Pr	25 E	ESIA noo		Date: 28/07/20
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Mildred Vanwyt	NI	mildred mercian @gmollcom	08167323£1	Allermy
	Magneth Trues	manufacturer	cedenfyp@gmail.com	05/3273189	(40)
3	BONIE NAOLED	MNF	WWW. bonie. 6 maile	0818388707	Madel

8 JUNE 2023 REV 01 PAGE 25 OF 31



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### I & AP Register

Date: 28 07 2022

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2	Muchili Fonge Hotlain Nouqub	Airs	-	bayammelsedo@graille		Ro Box 222 Karilob
3	Anthony Möller	GKR Navadrab	Employee	Anthony. Moller @ navachab.com.		
4	Tami Isaace	QKR Navachab		Tami. Isaaus @ nayochob. Com. no	0811505052	Karibib
5	Derick Touses	N/A	-		0817042445	Karibib
6	Denzel Koagub	AIM	-		0316468441	Karibil
7	Owen Afrikaner	Al In	_		1817181272	Karibib
8	Randy Fredericks	Nº/A	-		0616635173	Karikib
9	Zedrick Preterson	NIA			0818781841	Karibib,
10	Raymond Timongua	Community	-	raymondti, umgga	0817604106	Karibih



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### I & AP Register

Date: 28/07/2022

	NAME & SURNAME	ORGANIZATION	DECLARATION OF	EMAIL	TELEPHONE	ADDRESS
1	Selma Seikes	NA		USIL 786042	06117816	Iscaribil
2	Hilde Nguher			001		
3	Bonifation MANATA				061297663 0813397453	the second second second second
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5	CONZAD	w la			581814-2762	71
6	Ruber K	NIA			0813976581	17
7	Sheret	MA			0816640277	1)
8	Frieda a				0813189906	Tr.
9	Ilonien Auxises	N/A	(A)			Karibib Enf 38
10	H. Nanus	NIA				Keribib 38



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I & AP Register

Date: 28 07 2022

	NAME & SURNAME	ORGANIZATION	DECLARATION OF INTEREST	EMAIL	TELEPHONE	ADDRESS
1	Juliane Uliras	N/A		2 <del></del>	0814855531	_
2	ElFeiebe Gainaps	Community		e16:-h		
3	ROMNIE ROBERTS KHOLAD	1		elmedeganges@mal.		100
4	Enaciethness Neumbo	7. 1		encumbop i way no		
5	C V	~ T.		E souly . res	08,3971/25	
6	Evertin king	ET			0813740341	
7	Budroz Onos				68/3406916	
8	Rulina Namodo			barchuargio fignal se		
9	Hilma Lateka			hilmatotoka 23 mail		
10	Dosetinardipopilua				081375417	



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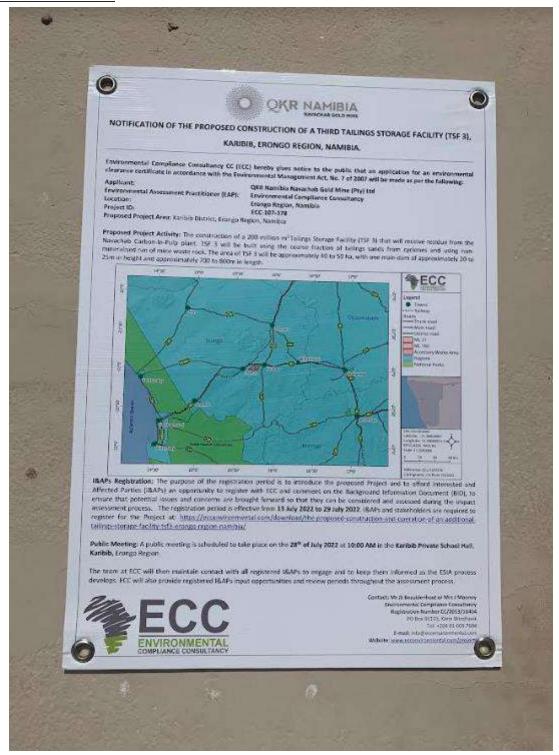
	NAME & SURNAME	ORGANIZATION	DECLARATION OF INTEREST	EMAIL	TELEPHONE	ADDRESS
1	MARA! Mayberino	Chairlady Pb-	Employee	~	0812591915	Karble
2	MARIA BASSON	Community	Employment/SME	Mary b. hassangama		0 - 0 - 10
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QKR Namibia Navachab Gold Mine (Pty) Ltd

### **APPENDIX E - SITE NOTICES**

### **Karibib Post Office**





QKR Namibia Navachab Gold Mine (Pty) Ltd

### **Karibib Town Council**

