ENVIRONMENTAL ASSESSMENT ADDENDUM REPORT

EXPLORATION ACTIVITIES ON EPL7729 AND 7935,
OTJOZONDJUPA REGION, NAMIBIA

PREPARED FOR

CHEETAH MINERALS EXPLORATION (PTY) LTD

APRIL 2021
TITLE AND APPROVAL PAGE

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*Please note at ECC we care about lessening our footprint on the environment; therefore, all documents are printed double sided.*
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# LIST OF ACRONYMS AND ABBREVIATIONS

<table>
<thead>
<tr>
<th>ABBREVIATIONS</th>
<th>DESCRIPTION</th>
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<tbody>
<tr>
<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<td>ECC</td>
<td>Environmental Compliance Consultancy</td>
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<tr>
<td>EMP</td>
<td>Environmental Management Plan</td>
</tr>
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<td>ESIA</td>
<td>Environment and Social Impact Assessment</td>
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<td>I&amp;AP</td>
<td>Interested and affected parties</td>
</tr>
<tr>
<td>MEFT</td>
<td>Ministry of Environment and Tourism</td>
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<tr>
<td>NTS</td>
<td>Non-Technical Summary</td>
</tr>
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</table>
1 INTRODUCTION

1.1 PROJECT OVERVIEW

This addendum report has been compiled following the public review periods of the Environment and Social Impact Assessment (ESIA) for the proposed exploration activities on EPLs 7729 and 7935 in the Otjozondjupa Region.

The public consultation period with adverts published and comments accepted on the Non-Technical Summary (NTS) was conducted between the 17th of November and the 1st of December 2020. See appendix B for newspaper adverts.

The ESIA was completed for the project and undertaken in accordance with the requirements of the Environmental Management Act, No.7 of 2007 and the Environmental Impact Assessment Regulations, promulgated in 2012.

Environmental Compliance Consultancy (ECC) prepared the assessment report and an Environmental Management Plan (EMP), which was made available for public review for the period 8 - 25 January 2021. The draft assessment report and the final ESIA report was compiled by ECC. All comments made by registered Interested and Affected Parties (I&APs) were incorporated and the report underwent amendments as a result of the input and comments provided by the I&APs.

This addendum report comprises all comments received during the entire public consultation period; presents the responses from ECC and the proponent; and signposts where further information has been provided in the ESIA report.

The addendum report has been set out to provide a concise summary as set out below in Table 1.

**TABLE 1 - ESIA ADDENDUM REPORT STRUCTURE**

<table>
<thead>
<tr>
<th>CHAPTER</th>
<th>TITLE</th>
<th>CONTENT</th>
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<tbody>
<tr>
<td>-</td>
<td>Acronyms</td>
<td>A list of acronyms used throughout the report.</td>
</tr>
<tr>
<td>1</td>
<td>Introduction</td>
<td>This chapter introduces the addendum report provides background information on the ESIA process.</td>
</tr>
<tr>
<td>2</td>
<td>Summary of comments</td>
<td>This chapter provides a summary of comments received from I&amp;APs and stakeholders.</td>
</tr>
<tr>
<td>3</td>
<td>Acknowledgements</td>
<td>Provides acknowledgements for the ESIA and addendum.</td>
</tr>
<tr>
<td>4</td>
<td>Detailed comment and response table</td>
<td>The detailed list of comments received during the public review with responses.</td>
</tr>
</tbody>
</table>
2 SUMMARY OF COMMENTS FROM I&APS

2.1 INTRODUCTION

The ESIA report will be formally submitted to the relevant competent authority, the Ministry of Environment, Forestry and Tourism (MEFT), for their record of decision. Comments received prior the submission of the report to MEFT were collated in a register that is presented in Table 2. Each comment has been responded to, and where it could be material to the decision making or enhanced the ESIA, amendments were made to the ESIA report. This has been cross referenced in the collated register as presented in Table 2. Where substantial changes were made due to feedback, the amended or new sections have been signposted in the addendum report table for easy review and reference.

The final ESIA report will be issued to the MEFT and relevant competent stakeholders and I&APs to accompany the application for an environmental clearance certificate.

The final ESIA report is available to download at: www.eccenvironmental.com

2.2 KEY FEEDBACK

The comments received from registered I&APs include comments from landowners who neighbour the proposed project site. This group of I&APs presented useful, meaningful and valuable input into the ESIA. Feedback consisted of identification of errors and requests for further information.

The key areas raised from the review can be summarised in the following categories:

- **Vagueness of some mitigation measures**: Stakeholders highlighted this to be a concern and wish to be provided with specific measures and plans that the proponent will enforce. The concerns include the issue of veld fires, poaching, potential conflicts with farm owners and neighbours as well as contamination of the soil, surface and groundwater.

  ✓ ECC conducted further research and included information in the ESIA report to address this concern.

- **Details about the joint venture**: The stakeholders demanded to be informed on further details (i.e. name(s), nationality) of the probable joint venture that was mentioned in the documents.

  ✓ Cheetah Minerals, being the EPL holder, is the responsible party in all respects. It should be stated that a joint venture is not formed yet, and until such a joint venture is formed, if at all, Cheetah Minerals remains the only responsible party.
3 ACKNOWLEDGEMENTS

ECC would like to thank the I&APs for providing feedback during the ESIA process. ECC has endeavoured to address all inputs received by I&APs.

ECC further acknowledges that constructive feedback 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&APs feedback has contributed to potential issues or concerns being addressed and considered throughout the process.

Although the official public review period is over, the proponent and ECC is open to continued consultation with I&APs. We look forward to the implementation phase of the project and continued work with all stakeholders.

Lastly ECC would like to thank the proponent for being so considerate and accommodating to the input and feedback from the ESIA team. Thank you for taking on and including feedback from the I&APs, and our team.
### DETAILED COMMENTS AND RESPONSES FROM PUBLIC REVIEW

**TABLE 2 – COMMENTS AND FEEDBACK**

<table>
<thead>
<tr>
<th>NO</th>
<th>COMMENT RECEIVED</th>
<th>STAKEHOLDER DETAILS</th>
<th>RESPONSE / CLARIFICATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Letter attached: RE: CHEETAH MINERALS (PROPRIETARY) LIMITED – EXCLUSIVE PROSPECTING LICENCES EPL 7729 AND EPL 27935 REQUEST TO BE REGISTERED AS A STAKEHOLDER AND REQUEST FOR INFORMATION</td>
<td>Mr. Wolf Wohlers Received via email (01.12.2020)</td>
<td>The process of registering stakeholders for this project is ongoing, the provided details and addresses will be recorded as I&amp;APS and included in all communications regarding this project. Thank you for providing these details. In response to your numbered items below, please see our comments.</td>
</tr>
</tbody>
</table>

We act for our client Rembo Limited, and its Namibian subsidiaries, who are Erindi Ranch (Proprietary) Limited and Otjimakuru Wild (Proprietary) Limited, the latter two companies acting in their capacities as owners of Farms Erindi, Constantia and Otjimakuru.

We refer to ECC’s advertisements and notices to various landowners, including our client’s subsidiaries, relating to the intended prospecting operations to be conducted by Cheetah Minerals (Proprietary) Limited on exclusive prospecting licences EPL 7729 and EPL 7935.

This letter constitutes a formal notification of interest as well as a request by all of the aforesaid parties (i.e., all of Rembo Limited, Erindi Ranch (Proprietary) Limited and Otjimakuru Wild (Proprietary) Limited as to the following:

1. All of the aforesaid parties hereby formally request to be recorded by ECC (or the relevant environmental practitioners
<table>
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<tr>
<th>NO</th>
<th>COMMENT RECEIVED</th>
<th>STAKEHOLDER DETAILS</th>
<th>RESPONSE / CLARIFICATION</th>
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<tbody>
<tr>
<td></td>
<td>from time to time of Cheetah Minerals (Proprietary) Limited as interested parties and stakeholders, and to be entered into the relevant registers as interested parties and stakeholders in connection with any environmental impact assessments, public consultations or meetings, opportunities to raise concerns or objections, environmental management plans and environmental clearance certificates to be applied for or granted to Cheetah Minerals (Proprietary) Limited (or any successor in title or transferee of EPL 7729 and EPL 7935) in connection with any intended prospecting or mining operations, or ancillary activities which are “listed activities” under the Environmental Management Act, 2007 in respect of EPL 7729, EPL 7935 or any other mineral licence arising therefrom.</td>
<td></td>
<td>1. This is noted and understood – all parties will be registered as I&amp;APs and an open dialogue is available for communications about the project.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The stakeholders map was updated accordingly. See Appendix C of the final ESIA report.</td>
</tr>
<tr>
<td></td>
<td>2. The aforesaid parties hereby request to be informed in detail as to the exact nature of the prospecting operations planned by Cheetah Minerals (Proprietary) Limited, in particular any such prospecting operations impacting on or in the vicinity of our client’s farms. If our client can be provided with the current work programmes for the aforesaid exclusive prospecting licences, this would be appreciated. Our client would request this for information purposes and for the purposes of advice, and would not distribute these to other land owners or third parties.</td>
<td></td>
<td>2. Thank you, this request is noted and understood – The preliminary exploration programme is set out in chapter 4, section 4.3: Table 5 of the ESIA report. Findings from the phase 1 work will inform subsequent phases of work, as the work plan evolves the proponent will provide this information to the client. It is the proponents intention to keep the landowner fully informed of proposed activities as details become available.</td>
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<td></td>
<td>3. Kindly advise us as to the date and venue of any public consultations or meetings that may be intended to be embarked on.</td>
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<td>NO.</td>
<td>COMMENT RECEIVED</td>
<td>STAKEHOLDER DETAILS</td>
<td>RESPONSE / CLARIFICATION</td>
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<td>upon in relation to the assessment process for obtaining environmental clearances for EPL 7729 and EPL 7935. Or, if the Environmental Commissioner has not required an assessment to be made, please advise us of the next steps that the licence holder intends to follow.</td>
<td></td>
<td>3. At this stage we do not intend to hold a public meeting, however as needed / required we consult with farm owners upon their request. Should your clients wish to have a meeting with our team we will gladly arrange to do so. No public meeting was held at the conclusion of the EISA, as no additional requests for such was received.</td>
</tr>
<tr>
<td></td>
<td>4. Please record the following addresses as official address for any and all communications between Cheetah Minerals (Proprietary) Limited (or their environmental practitioners) with our clients with regard to any environmental matters pertaining to EPL 7729 and EPL 7935:</td>
<td></td>
<td>4. This is noted and understood. Please refer to updated appendix C of the ESIA report for the list of stakeholders inclusive of the parties requested to be added. Action complete.</td>
</tr>
</tbody>
</table>

**Dear Jessica,**

Please find herewith a letter addressed to ECC (and Cheetah Minerals Exploration (Proprietary) Limited) with comments and queries on the EIA’s and the EMP for EPL’s 7729 and 9735.

We look forward to hearing from you.

**1. Environmental Management Plan, Page 6, Paragraph 1.1**

1 – A Our Clients are puzzled by the reference in paragraph 1.1 of the Environmental Management Plan that the exploration programme “will most likely be operated in a Joint Venture with Cheetah Minerals Exploration (Proprietary) Limited”. It was our understanding that the licence holder is Cheetah Minerals.

<table>
<thead>
<tr>
<th><strong>Mr. Wolf Wohlers</strong></th>
<th><strong>Received via email (21.01.2021)</strong></th>
<th><strong>1. Response:</strong></th>
<th>1 - A: Cheetah Minerals, being the EPL holder, is the responsible party in all respects. It should be stated that a joint venture is not formed yet, and until such a joint venture is formed, if at all, Cheetah Minerals remains the only responsible party. Please refer to</th>
</tr>
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</table>
Exploration (Proprietary) Limited and this is also what appears from the cadastre at the Ministry of Mines and Energy.

1 – B: Whilst Cheetah Minerals Exploration (Proprietary) Limited and its principals are known to the writer, you would appreciate that the involvement of any unknown joint venture partner or partners would potentially be concerning to our Clients. As you would be aware, various Namibian and foreign exploration entities are not known for their strict adherence to environmental laws or standards. Therefore, our Clients would request ECC and Cheetah Minerals Exploration (Proprietary) Limited to kindly clarify the following:

1 – C: Who are the relevant joint venture partners on EPL 7729 and EPL 7935 respectively?

1 – D: The nationality or country of origin (and, where applicable, the holding companies) of these joint venture partners.

1 – E: An indication whether Epangelo Mining Company (Proprietary) Limited (or any of its subsidiaries or associated companies) or any other state-owned or state-connected enterprise (whether Namibian or foreign) would be the joint venture partner in question.

chapter 1, paragraph 1.1 in the EMP that emphasises the likelihood of a joint venture that may be formed. However, Cheetah Minerals (Pty) Ltd is the sole holder of the exploration licence and operation thereof.

1 - B to F: Based on the above response, no further action is required for the remaining points listed in the correspondence received.
<table>
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<th>NO</th>
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<th>STAKEHOLDER DETAILS</th>
<th>RESPONSE / CLARIFICATION</th>
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<tbody>
<tr>
<td>1</td>
<td>F: Our Client requests the above information in order to be able to conduct its own investigations on the track record of such joint venture partners, but appreciates that Cheetah Minerals Exploration (Proprietary) Limited may not wish such information to be publicized. Accordingly, our Clients would be prepared to give an undertaking to not disseminate such information other than to its own legal and professional advisers.</td>
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**Environmental Management Plan, Page 17, Table 3**

2 - A: With regard to the risks of “potential conflict with farm owners and neighbours (suspicious movement, poaching, stock theft, collecting of organisms, veld fires, etc.)” referred to on page 17 Table 3 of the Environmental Management Plan, you would appreciate that these risks could directly or indirectly affect our Clients and (for example in the case of poaching or veld fires) could cause significant potential damage.

In this regard, our Client’s comment is that the proposed management and mitigation measures referred to in Table 3 are too vague and too unspecific. Please also refer to our comment under 3.3 below.

2 – A continued: Our Clients would therefore request the proponent for the environmental clearance certificate to kindly provide detailed mitigation plans and action undertaking in relation to mitigating veld fires and reducing the risk of poaching.

**Response:**

2 – A: The EMP (see p 18): stipulates that the movements of people, vehicles and equipment are restricted to

- Existing tracks and routes only
- Areas of activities only
- Daytime hours

In addition we have included the following

- ID copies of all personnel working on the EPL will be given to the farm owner along with a site attendance register.
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<th>STAKEHOLDER DETAILS</th>
<th>RESPONSE / CLARIFICATION</th>
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<tr>
<td></td>
<td>With regard to veld fires, for example, our Clients would like to know what undertakings will be given by the proponent as to the type of firefighting equipment that is to be on or at an exploration or drilling site, what the safety precautions are as to cooking at an exploration or drilling site (also if cooking does not take place on an open fire (which it should not) but on a gas stove or comparable) and what the meters for applicable fire breaks are, etc. With regard to poaching, the issue, as you would be aware, is often that prospecting personnel provides intelligence or information to persons or syndicates from out of area which places such persons or syndicates in a position to conduct organised poaching. In this regard, our Clients would like to know what the proposals and safety protocols of the proponent are to prevent the unnecessary gathering of information which could lead to poaching.</td>
<td></td>
<td>The EMP contains specific management arrangements and mitigation measures to prevent illegal activities</td>
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<td>- The presence of rare, endangered, threatened and protected species will be identified in advance, and new routes, if new routes are necessary, will be routed around protected and sensitive areas.</td>
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<td></td>
<td>- Personnel will be trained and a zero tolerance policy implemented regarding illegal activities such as poaching, stock theft, and the collecting of organisms and the consequences when a member makes themselves guilty of any of these offences. Table 3 updated.</td>
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<td>- Strict rules will be implemented to prevent the sharing of information about rhino and pangolin sightings, livestock, rare plants, etc. via verbal exchanges, geographical tagging, photographs or any other means.</td>
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</tbody>
</table>
### Comment Received

**Environmental Management Plan, Page 21, Table 3**

2 – B: With regard to the risks of “Fire risk” referred to on page 21 Table 3 of the Environmental Management Plan, please see our comments under 3.2 above. Again, our Clients’ concern is that the mitigation measures proposed are expressed in rather general and vague terms, and our Client would like to see more detailed plans and undertakings which would put them at ease that Cheetah Minerals Exploration (Proprietary) Limited would have taken all reasonable measures to prevent veld fires. The same would apply to spills which are not localised but – for example, when water is contaminated – have the potential to affect farms Erindi and Constantia.

### Stakeholder Details

with Intelligence Support Against Poaching, the Namibian Police, Farmers Association, etc. Also included in table 3 page 18 of the EMP.

Moreover, it should be reiterated that the spirit of the EMP is to create cooperation mechanisms on the front of preventing illegal activities such as (organised) poaching, stock theft, and the collecting of organisms. The EMP clearly stipulates that an environmental and social operations manual will be developed and implemented, for personnel to follow when they work on private land, and the EMP recommends continuous communication with I&APs to identify concerns and mitigation measures (see p 18).

### Response

**Response:**

2 – B: The EMP contains clear management arrangements for the prevention of accidental and uncontrolled veld fires that may destroy grazing and kill living organisms (Please refer to Chapter 5 within the EMP, pages 21 and 22):

Movements of people, vehicles and equipment are restricted to:

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<th>NO</th>
<th>COMMENT RECEIVED</th>
<th>STAKEHOLDER DETAILS</th>
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<td></td>
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<td>with Intelligence Support Against Poaching, the Namibian Police, Farmers Association, etc. Also included in table 3 page 18 of the EMP. Moreover, it should be reiterated that the spirit of the EMP is to create cooperation mechanisms on the front of preventing illegal activities such as (organised) poaching, stock theft, and the collecting of organisms. The EMP clearly stipulates that an environmental and social operations manual will be developed and implemented, for personnel to follow when they work on private land, and the EMP recommends continuous communication with I&amp;APs to identify concerns and mitigation measures (see p 18).<strong>Response:</strong> 2 – B: The EMP contains clear management arrangements for the prevention of accidental and uncontrolled veld fires that may destroy grazing and kill living organisms (Please refer to Chapter 5 within the EMP, pages 21 and 22): Movements of people, vehicles and equipment are restricted to:</td>
</tr>
</tbody>
</table>
### NO

### COMMENT RECEIVED

Environmental Management Plan, Page 24, Table 4

3 - A: With regard to the risks of “Soil contamination” and “ground and surface water contamination” referred to on page 24 Table 3 of the Environmental Management Plan, again, our Client’s concern is that the mitigation measures are stated in broad and vague terms.

Our Clients’ concern is that a contamination of ground water on neighbouring farms could affect the water on Farms Erindi and Constantia. Again, our Client would kindly request that the proponent provide more detailed plans and undertakings as to the mitigation measures, to provide our Client’s with the necessary assurance that all reasonable steps are being taken to prevent ground water contamination.

### STAKEHOLDER DETAILS

### RESPONSE / CLARIFICATION

- Existing tracks and routes only;
- Areas of activities only;
- Daytime hours;
- Personnel will be trained and made aware about the danger of veld fires and firefighting;
- The making of open fires will be restricted to designated areas, where the necessary fire prevention measures are in place (i.e., fire breaks, firefighting equipment is available)

Considering the comments received, additional measures relating to the fire risk of open fire cooking, was included in the EMP on page 22:

- Food will not be prepared on unguarded fires but on a gas stove or comparable, within a designated area (such as a field kitchen), where the necessary precautions are in place, i.e., functioning firefighting equipment is available.
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<tr>
<th>NO</th>
<th>COMMENT RECEIVED</th>
<th>STAKEHOLDER DETAILS</th>
<th>RESPONSE / CLARIFICATION</th>
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<tr>
<td></td>
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<td></td>
<td><strong>Response:</strong></td>
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<td></td>
<td>3 – A: The EMP contains clear management arrangements with several mitigation measures to prevent potential (soil and water) contamination (Please refer to chapter 5 within the EMP on pages 21, 22, 23 and 24). For ease of reference the specific provision is listed below:</td>
</tr>
<tr>
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<td>In addition to good housekeeping, personnel will be well-trained and made aware of potential sources of contamination. Specific arrangements include:</td>
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<td>- All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil.</td>
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<td>- Spill kits and absorption material will be available during fuel delivery, storage or use.</td>
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<td></td>
<td>- Accidental spills and leaks (including absorption material) will be cleaned up as soon as possible.</td>
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<td></td>
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<td></td>
<td>- Maintenance and service schedules on equipment will be in place to prevent leaks, breaks and spills.</td>
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</tbody>
</table>
Bulk fuel will be stored in adequate containment areas (non-porous surface, bunded, within a fenced-in area), in compliance with relevant legislation and regulations.

- Refuelling will be done in designated areas with adequate preventative measures in place.

- Where applicable, potential contaminants (e.g. old oil, grease) will be contained.

- Wastewater will be contained in appropriate containment units.
APPENDIX A – LETTER FROM STAKEHOLDERS

BY HAND / Per Email: jessica@eccenvironmental.com

The Director & Principal Environmental Practitioner
Mrs Jessica Bezuidenhout
Environmental Compliance Consultancy (ECC)
P.O. Box 91193
1 Jan Jonker Street
Wasserberg Park
Klein Windhoek
Windhoek

[21st/22nd] January 2021

Dear Jessica,

IN RE: CHEETAH MINERALS (PROPRIETARY) LIMITED –
EXCLUSIVE PROSPECTING LICENCES EPL 7729 AND EPL 7935
QUERIES AND COMMENTS ON ENVIRONMENTAL IMPACT ASSESSMENTS
AND ENVIRONMENTAL MANAGEMENT PLAN

1. We confirm that we act for our client Rembo Limited, and its Namibian subsidiaries, who are Erindi Ranch (Proprietary) Limited and Otjimakuru Wild (Proprietary) Limited, the latter two companies acting in their capacities as owners of Farms Erindi (“Erindi”), Constantia (“Constantia”) and Otjimakuru (jointly hereinafter referred to as “our Clients”), and we refer to your email of 8th January 2021 containing the Environmental Assessment for EPL 7729, the Environmental Assessment for EPL 7935 and the Environmental Management Plan for both EPL 7729 and 7935.

2. We note your request that we should comment on the EIA’s and the EMP by 25th January 2021.

3. Having reviewed the documents in detail, we would seek your clarification and would like to comment, as the case may be, on the following matters:
3.1 Environmental Management Plan, Page 6, Paragraph 1.1

3.1.1 Our Clients are puzzled by the reference in paragraph 1.1 of the Environmental Management Plan that the exploration programme “will most likely be operated in a Joint Venture with Cheetah Minerals Exploration (Proprietary) Limited”. It was our understanding that the licence holder is Cheetah Minerals Exploration (Proprietary) Limited and this is also what appears from the cadastre at the Ministry of Mines and Energy.

3.1.2 Whilst Cheetah Minerals Exploration (Proprietary) Limited and its principals are known to the writer, you would appreciate that the involvement of any unknown joint venture partner or partners would potentially be concerning to our Clients. As you would be aware, various Namibian and foreign exploration entities are not known for their strict adherence to environmental laws or standards. Therefore, our Clients would request ECC and Cheetah Minerals Exploration (Proprietary) Limited to kindly clarify the following:

3.1.2.1 Who are the relevant joint venture partners on EPL 7729 and EPL 7935 respectively?

3.1.2.2 The nationality or country of origin (and, where applicable, the holding companies) of these joint venture partners.

3.12.3 An indication whether Epangelo Mining Company (Proprietary) Limited (or any of its subsidiaries or associated companies) or any other state-owned or state-connected enterprise (whether Namibian or foreign) would be the joint venture partner in question.

3.12.4 Our Client requests the above information in order to be able to conduct its own investigations on the track record of such joint venture partners, but appreciates that Cheetah Minerals Exploration (Proprietary) Limited may not wish such information to be publicised. Accordingly, our Clients would be prepared to give an undertaking to not disseminate such information other than to its own legal and professional advisers.

3.2 Environmental Management Plan, Page 17, Table 3

3.2.1 With regard to the risks of “potential conflict with farm owners and neighbours”
3 (suspicious movement, poaching, stock theft, collecting of organisms, veld fires, etc.)” referred to on page 17 Table 3 of the Environmental Management Plan, you would appreciate that these risks could directly or indirectly affect our Clients and (for example in the case of poaching or veld fires) could cause significant potential damage.

3.2.2 In this regard, our Client’s comment is that the proposed management and mitigation measures referred to in Table 3 are too vague and too unspecific. Please also refer to our comment under 3.3 below.

3.2.3 Our Clients would therefore request the proponent for the environmental clearance certificate to kindly provide detailed mitigation plans and action undertaking in relation to mitigating veld fires and reducing the risk of poaching. With regard to veld fires, for example, our Clients would like to know what undertakings will be given by the proponent as to the type of firefighting equipment that is to be on or at an exploration or drilling site, what the safety precautions are as to cooking at an exploration or drilling site (also if cooking does not take place on an open fire (which it should not) but on a gas stove or comparable) and what the meters for applicable fire breaks are, etc. With regard to poaching, the issue, as you would be aware, is often that prospecting personnel provides intelligence or information to persons or syndicates from out of area which places such persons or syndicates in a position to conduct organised poaching. In this regard, our Clients would like to know what the proposals and safety protocols of the proponent are to prevent the unnecessary gathering of information which could lead to poaching.

3.3 Environmental Management Plan, Page 21, Table 3

With regard to the risks of “Fire risk” referred to on page 21 Table 3 of the Environmental Management Plan, please see our comments under 3.2 above. Again, our Clients’ concern is that the mitigation measures proposed are expressed in rather general and vague terms, and our Client would like to see more detailed plans and undertakings which would put them at ease that Cheetah Minerals Exploration (Proprietary) Limited would have taken all reasonable measures to prevent veld fires. The same would apply to spills which are not localised but – for example, when water is contaminated – have the potential to affect farms Erindi and Constantia.

3.4 Environmental Management Plan, Page 24, Table 4

3.4.1 With regard to the risks of “Soil contamination” and “ground and surface water contamination” referred to on page 24 Table 3 of the Environmental Management Plan, again, our Client’s concern is that the mitigation measures are stated in broad and vague
terms.

3.4.2 Our Clients’ concern is that a contamination of ground water on neighbouring farms could affect the water on Farms Erindi and Constantia. Again, our Client would kindly request that the proponent provide more detailed plans and undertakings as to the mitigation measures, to provide our Client’s with the necessary assurance that all reasonable steps are being taken to prevent ground water contamination.

We look forward to hearing from you.

Sincerely yours,

ENSafrica | Namibia

[Signature]

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