NON-TECHNICAL SUMMARY

EXPLORATION ACTIVITIES ON EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, and 7732

FOR BASE AND RARE METALS, PRECIOUS METALS

PREPARED FOR

KUISEB COPPER COMPANY (PTY) LTD

SEPTEMBER 2020
NON-TECHNICAL SUMMARY

PROPOSED EXPLORATION ACTIVITIES ON EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732

FOR BASE AND RARE METALS AND PRECIOUS METALS IN THE OMAHEKE AND KHOMAS REGIONS

1 PURPOSE OF THIS DOCUMENT
The purpose of this Non-Technical Summary (NTS) is to provide Interested and Affected Parties (I&APs) a background to the proposed project and to invite I&APs to register as part of the Environmental Social Impact Assessment (ESIA) process.

The proposed project involves exploration activities for base and rare metals and precious metals on Exclusive Prospecting License (EPLs) 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732, operated by Kuiseb Copper Company (Pty) Ltd.

Through registering for the project, all I&APs will be kept informed throughout the ESIA process, and a platform for participation will be provided to submit comments / recommendations pertaining to the project.

This NTS includes the following information:
- The proposed project and location;
- The necessity of the project, benefits or adverse impacts anticipated;
- The alternatives to the project that have been considered and assessed;
- How the ESIA process works;
- The public participation process and how to become involved; and
- Next steps and the way forward.

2 DESCRIPTION OF PROPOSED PROJECT
2.1 BRIEF INTRODUCTION
Environmental Compliance Consultancy (ECC) has been engaged by the proponent Kuiseb Copper Company (Pty) (Ltd) to undertake an ESIA and an Environmental Management Plan (EMP) in terms of the Environmental Management Act, 2007 and its regulations. An environmental clearance application will be submitted to the relevant competent authorities; the Ministry of Mines and Energy (MME) and Ministry of Environment, Forestry and Tourism (MEFT).

2.2 LOCATION
Kuiseb Copper Company (Pty) Ltd proposes to explore on EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732 in an area potentially prospective for copper in eastern Namibia, Khomas and Omaheke regions. The sites can be accessed via the B6 main road from Windhoek towards Gobabis or the B1 main road to Rehoboth and from Gobabis towards the C22 road. The location is shown in Figure 1.

2.3 WHAT IS PROPOSED
Kuiseb Copper Company (Pty) Ltd (KCC) and Rio Tinto Mining and Exploration Ltd (RT), through a formal KCC-RT Joint Venture agreement whereby KCC will fully operate the exploration program, in search for mineral deposits of base and rare metals, and or precious metals. Various exploration techniques and methods will be used on the EPLs as set out in section 2.5.

Both Rio Tinto and Kuiseb Copper Company adhere fully to the norms of Health, Safety, Environment and Community.
2.4 WHY IS THE PROJECT NEEDED

Kuiseb Copper Company intends to pursue exploration opportunities with the aim of identifying new mining prospects. Exploration could lead to mining activities, which would contribute to the national and local economies.

2.5 OPERATION PHASE

The proposed exploration activities are generally low-impact and non-intrusive. The exploration activities to be used may be ‘scaled up’ depending on exploration findings. The following are envisaged during the proposed project:

- Airborne geophysical surveys (non invasive);
- Potential creation of access tracks, where existing tracks cannot be utilised;
- Limited vegetation clearing for the creation of tracks, and survey access; and
- Ground exploration activities may include soil and rock sampling, geological mapping, geophysical surveys, temporary trenching, drilling and drill-core sampling.
FIGURE 1 – LOCATION MAP OF THE PROPOSED PROJECT
2.6 Potential Impacts of the Project

2.6.1 Socio-economic

The potential social impacts are anticipated to be of low significance, and those that may transpire shall be confined within the EPLs site, these potential impacts may include the following:
- Potential to unearth, damage or destroy undiscovered heritage remains;
- Minor disruption to the residents of the farms within the EPLs, including some increase in noise levels and dust arising from drilling and vehicle use;
- Some jobs will be created as a result of the project; and
- There will be economic benefits due to increased investment and investor confidence in the Namibian minerals sector.

2.6.2 Environmental

The potential environmental impacts are anticipated to be of minor significance, and those that may occur shall be contained within the EPLs site, these potential impacts may include the following:
- Some potential vegetation loss due to possible tracks creation; the vegetation is expected to recover fully during ensuing rain seasons;
- Potential use of resources, including surface and groundwater; and
- Minor risk of loss of contaminant of hydrocarbon, chemical or drill fluids from exploration activities potentially leading to localised ground contamination; this aspect will be controlled at all times.

3 Consideration of Alternatives

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed project.

In a project such as this one, it is difficult to identify alternatives to satisfy the need of the proposed project; the activities shall be specific to the EPLs, which were granted by the MME.

During the assessment, alternatives will take the form of a consideration of optimisation and efficiency to reduce potential effects e.g. different types of technology or operations, route access and exploration methods.

4 The Environmental Assessment Process

This ESIA, conducted by ECC, is undertaken in terms of the Environmental Management Act, 2007 and its regulations. The process followed in this ESIA is set out in the flowchart in Figure 2.

![Flowchart of the Environmental Assessment Process](image-url)
4.1 SCREENING
A review of the proposed project screening findings against the listed activities was conducted; the findings of which are summarised below.

FORESTRY ACTIVITIES
(4) The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in terms of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.

- Limited vegetation clearing may be required for tracks and survey access creation, and possibly for the set up for survey teams’ field camps.

WATER RESOURCE DEVELOPMENT
(8.1) The abstraction of ground or surface water for industrial or commercial purposes

- Due to the drilling of exploration boreholes, ground and surface water will need to be abstracted, or sourced.

MINING AND QUARRYING ACTIVITIES
(3.1) The construction of facilities for any process or activities which requires a licence, right or other form of authorisation, and the renewal of a licence, right or other form of authorisation, in terms of the Minerals (Prospecting and Mining Act), 1992

- This listed activity, infers the provisions of the Minerals Act (Prospecting and Mining) Act 33 of 1992, under different licenses as basis upon which certain activities qualify for an EIA. Part X of the Minerals Act (1992) defines prospecting/exploration activities under the lawful ownership of an exploration license (EPL). An exploration license excludes any mining activities, but includes activities strictly relating to exploration work. Hence the current project strictly focuses on exploration and not mining.

(3.2) Other forms of mining or extraction of any natural resources whether regulated by law or not

- All extraction during exploration will be for geochemical and geological sampling purposes only.

4.2 BASELINE STUDIES
For the proposed project, baseline information will be obtained through desk-based studies and site verification.

The ESIA will focus on the environmental receptors that could be affected by the proposed project. ECC will also engage with stakeholders, I&APs and the proponents to seek input into the assessment.

4.3 IMPACT ASSESSMENT
Impacts will be assessed using the ECC ESIA methodology. The ESIA will be conducted in terms of the Environmental Management Act, 2007 and its regulations. ECC’s methodology for impact assessments was developed using IFC standards in particular Performance Standard 1 ‘Assessment and management of environmental and social risks and impacts’ (IFC 2012, 2017) and Namibian Draft Procedures and Guidance for ESIA and EMP (GRN, 2008) including international and national best practice with over 25 years of combined ESIA experience.

4.4 ENVIRONMENTAL MANAGEMENT PLAN
An EMP shall be developed for the proposed project setting out audible management actions for the project to ensure careful and sustainable management measures are implemented for their activities in respect of the surrounding environment and community.

4.5 PUBLIC PARTICIPATION AND ADVERTISING
Public participation is an important part of the ESIA process; it allows the public and other stakeholders to raise concerns or provide valuable local environmental knowledge that can benefit the assessment, in addition it can aid the
design process. This project is currently at the scoping phase and public participation phase.

At this phase ECC will perform the following:
- Identify key stakeholders, authorities, municipalities, environmental groups and interested or affected members of the public, hereafter referred to as I&APs
- Distribute the NTS for the proposed project (this document)
- Advertise the environmental application in two national newspapers
- Place notices on-site at or near the boundary
- If required host a public meeting to encourage stakeholder participation and engagement, and provide details of issues identified by the environmental practitioner, stakeholders and I&APs
- Record all comments of I&APs and present such comments, as well as responses provided by ECC, in the comments and responses report, which will be included in the scoping report that shall submitted with the application, and
- Circulate I&AP comments to the project team for consideration of project design.

Comments must be submitted in writing and can be emailed using the details in the contact us section below.

CONTACT US

We welcome any enquiries regarding this document and its content. Please contact:

Environmental Compliance Consultancy (ECC)
info@eccenvironmental.com
Tel: +264 816 697 608
www.eccenvironmental.com

At ECC we make sure all information is easily accessible to the public.

Follow us online to be kept up to date:
APPENDIX C- EVIDENCE OF PUBLIC CONSULTATION

The following was advertised in the ‘Republikein, Sun, and Allgemeine Zeitung’ newspapers on the 21st September 2020.
Donkerhoek begs council for toilets

Health hazard

Residents claim they’ve been living without proper toilets for the past 30 years.

Donkerhoek informal settlement residents in Khomas want the Khomas town council to speed up completing the toilets. They claim that informal settlement residents have been without toilets since independence 39 years ago. In interviews with Nampa, residents said it is a health hazard to use toilets at some homes as toilets and to walk long distances to the bush when nature calls.

The council said that they will be the only solution. One of the residents, Neliswe Masango, 35, said that being in an informal settlement does not mean that they have to be denied basic services such as proper toilets.

“I have been living here my whole life and I would like them to build toilets for us. Councillors have come and gone with their empty promises. Many of us are not able to use a toilet due to the long distances we have to walk. It is not safe for especially young women and girls to walk distances just to relieve ourselves especially at night,” she said.

About 1,000 people live in Donkerhoek.

She added that with diseases such as Hepatitis E, people living in the informal settlement here will easily contract the disease.

“Ghetto”

Marite Kaimas, 40, said she and her children are at least half on a block of toilets for residents to use. “I think building a toilet at every house in the informal settlement will take more than 10 years. If they did not put up a structure with even four toilets that would be okay for now. That will show that they really care for us. After all these years why is there not even a single toilet for us that is being built in these ghettos? It is because they do not care because they have the money. I think when Alphamin Xambo, 39, said: ‘I would like the council to at least build dry toilets for us at every house like we are seeing at futsions. Imagine families have toilets but we staying in a town don’t have that.’”

In a recent interview with Nampa, Khomas town council CEO, Andries Homanik said: “The council has prioritised the provision of basic services to residents in informal settlements for the past 5 years. Continuous attention will be given to ensuring that the service delivery will be that which is promised to the owner, taking into consideration the investments that have been made for the purpose.”

The informal settlement has about 1,000 inhabitants.

Robust results’ for Capricorn

FROM PAGE 1

The analyser said: “The results were driven by strong up-line growth at net interest income (increased by 2.3% y/y) and non-interest income driven growth of 11.7%. The growth in net interest income was attributed to a solid performance from asset management and momentum is expected to continue in the second half of the year. The non-interest income increase in advance of bringing this one of the ambitious targets to NHM billion.”

“Overall, the results are reasonably resilient given the economic environment,” Luit said.

Cirius commented: “While the results on good, and even better than expected, PT3 (fiscal year 2018) should be a more difficult period for the Group, we expect CAPEX to be lower than forecast and earnings remaining dormant. Overall, Capricorn Group’s response to a challenging year showed resilience and sustainability in its operations and people,” Prins spectator said.

Delivering the well-being of the business, our employees and clients as a priority during the pandemic, Capricorn Group offered and performed well in terms of its core activities.

Bash Wibodh, our flagship fund, delivers strong results. “Profitability under pressure in the last three months of the financial year. The significant reduction in NPL (non-performing loans) was impacted with most of Wibodh’s NPL (non-performing loans) being directly rejected by the company’s historial rate,” Prins spectator said.

NPL

Cirius said Capricorn’s non-performing loans increased by N$360 million during the twelve months under review to N$234 million.

“This resulted in the NPL (non-performing loans) reducing from 4.7% to 3.9% in the previous period. The management team is satisfied with the progress made in reducing NPLs and the Group is confident that the total dividend per share declared for the previous financial year will be paid. We believe that the total dividend balance per share is a significant milestone for our shareholders,” Capricorn is said.

One of the factors taken into account for the determination of the dividend was “the call by banking regulators to re-allocate dividends to strengthen banks’ balance sheets. The board feels that this is aligned with the Group’s objective of transferring value to shareholders.”
The following was advertised in the ‘Republikein, Sun, and Allgemeine Zeitung’ newspapers on the 28th September 2020.

**Easing of fiscal consolidation policy**

**Agriculture, ICT, health drives growth**

ICT grew due to increased activities in the usage of data as demand surged up for data and calls as workers switch from working from offices to homes.

The real Gross Domestic Product contracted by 1.1 percent during the period under review, compared to a decline of 3.6 percent in the same quarter of 2019.

**Drivers**

The deeper reduction in the domestic economy was observed across all sectors of the economy, except for agriculture and forestry, ICT and health. The poor performance of the economy was mainly due to the impact of measures that were put in place to combat the spread of the COVID-19 pandemic, SSA says. The agriculture and forestry sector surged by 47.2 percent in real value added during the second quarter of 2020, relative to a steeper contraction of 58.4 percent registered during the same quarter of 2019, SSA added.

The main driver for performance stems from an increase in activities of the crop farming sub-sector, which posted a massive growth of 606.7 percent in real value added compared to a decline of 61.6 percent in the corresponding quarter of 2019. The positive performance in the sector is attributed to the number of crops harvested and increased during the period under review, the report further indicates.
NOTICE OF ENVIRONMENTAL ASSESSMENT AND PUBLIC PARTICIPATION PROCESS FOR EXPLORATION ACTIVITIES FOR BASE AND RARE METALS AND PRECIOUS METALS, IN THE KHOMAS AND OMAHEKE REGIONS, NAMIBIA

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

**Applicant:** Kuiseb Copper Company (Pty) Ltd  
**Location:** Khomas and Omaheke regions, Namibia  
**Project ID:** ECC-113-309

**Project:** Exploration activities on EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732 for base and rare metals and precious metals in the Khomas and Omaheke regions, Namibia.

**Proposed activity:** The proponent proposes to carry out exploration activities for base and rare metals and precious metals in the Khomas and Omaheke regions in the Gobabis, Witvlei and Doringveld areas, of eastern Namibia. Exploration methods may include an airborne electromagnetic survey (non-invasive, coarse line spacing) and ground truthing, soil and rock-chip sampling, geological mapping and geophysical surveys. Exploration trenching and drilling may occur at a later stage should initial test results appear viable.

**Purpose of the review and registration period:** The purpose of the review and registration period is to introduce the proposed project and to afford interested and Affected Parties (I&APs) an opportunity to register and comment on the Non-Technical Summary (NTS) and to ensure that potential issues and concerns are brought forward, captured and considered further in the assessment process.

**Registration period:** Effective from 21 September 2020 – 12 October 2020.

**How you can participate:** ECC is undertaking the required environmental assessment and public participation process in terms of the Act. I&APs and stakeholders are required to register for the project at: [https://eccenvironmental.com/projects/](https://eccenvironmental.com/projects/)

Contact: Mr JS Bezuidenhout or Mrs J Mooney  
Environmental Compliance Consultancy  
Registration Number CC/2013/11404  
PO Box 91193, Klein Windhoek  
Tel: +264 81 669 7608  
E-mail: info@eccenvironmental.com  
Website: [http://www.eccenvironmental.com](http://www.eccenvironmental.com)
Identified Stakeholder and or Potentially Interested Party for:
Kuiseb Copper Company Exploration Activities

Dear Sir or Madam:

RE: NOTIFICATION OF ENVIRONMENTAL ASSESSMENT FOR EXPLORATION ACTIVITIES FOR BASE AND RARE METALS AND PRECIOUS METALS ON EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732 IN THE KHOMAS AND OMAHEKE REGIONS, NAMIBIA.

Environmental Compliance Consultancy (ECC) has been engaged by Kuiseb Copper Company (Pty) Ltd (the Proponent) to act on their behalf for the environmental clearance certificate application for the proposed exploration activities for base and rare metals and precious metals on EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732 in the Khomas and Omaheke regions, Namibia.

ECC is conducting the Environmental Impact Assessment (EIA) in terms of the Environmental Management Act, No. 7 of 2007 and will be submitted to the competent authority and the Ministry of Environment, Forestry and Tourism for a record of decision.

The proposed project is to conduct mineral exploration activities on EPLs 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731 and 7732. As part of the proposed exploration project, the following activities are envisaged, which shall be confirmed, as the exploration program is refined:

- Airborne geophysical surveys (non-invasive, coarse line spacing);
- Potential creation of access tracks, where existing tracks cannot be utilised;
- Limited vegetation clearing for the creation of tracks, and survey access; and
- Ground exploration activities may include soil and rock-chip sampling, geological mapping, geophysical surveys, temporary trenching, drilling and drill-core sampling.
This letter is intended to engage stakeholders and potentially Interested and Affected Parties (I&APs) of the project and provide a communication channel to ECC for the project. You have been identified as either a stakeholder, interested or affected party; therefore ECC wishes to inform you of how you can become involved in the project.

Public participation is an important part of the EIA process, as it allows public and stakeholders to obtain information about the proposed project. Public participation occurs at various stages throughout a project lifecycle including:

- Advertising in newspapers;
- Distributing a Non-Technical Summary (NTS) to identified stakeholders and I&APs;
- Registered I&APs will also be informed of the available draft scoping report for a 7-day comment and review period, during this period I&APs will have the opportunity to review the draft document and raise any issues or concerns, and
- Stakeholders and I&APs who wish to register as an I&AP must do so on the ECC website as per the link provided below: https://eccenvironmental.com/projects/

If you are unable to complete the registration form online please email info@eccenvironmental.com and request an electronic copy of the form that you can complete, sign, scan and return via email to info@eccenvironmental.com to register as an I&AP for the project.

ECC values community input and participation in our projects and we look forward to working with you as the project develops.

The NTS can also be obtained from our website and provides a brief overview of the proposed project https://eccenvironmental.com/projects/

Should you have any questions or require additional information please do not hesitate to contact either of us.

Yours sincerely,

Stephan Bezuidenhout
Environmental Compliance Consultancy
Contact: 081 669 7608
Email: stephan@eccenvironmental.com

Jessica Bezuidenhout (Mooney)
Environmental Compliance Consultancy
Contact: 081 669 7608
Email: jessica@eccenvironmental.com
INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC-113-309 Kuiseb Copper Company

Project Title: Exploration Activities on EPL 7528, 7529, 7530, 7531, 7532, 7533, 7534, 7535, 7536, 7537, 7538, 7539, 7540, 7541, 7542, 7543, 7730, 7731, 7732

Applicant: Kuiseb Copper Company (Pty) Ltd

This form serves to register Interested and Affected Parties (I&AP’s) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision making process.

INTERESTED AND AFFECTED PARTIES (I&AP) DETAILS

<table>
<thead>
<tr>
<th>Title (Mr/Mrs/Dr/Prof.):</th>
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<td>Postal Address:</td>
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<tr>
<td>Organisation and/or property description (if landowner/lawful occupier)</td>
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</tr>
</tbody>
</table>

Stakeholder Group (please tick)
- Member of Affected Community
- Non-Governmental Organisation (NGO)
- Provincial or Government Official
- Local or District Official

GENERAL INTEREST IN THE PROJECT

Please describe the nature of your interest in this project.
INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

<table>
<thead>
<tr>
<th>GENERAL INTEREST IN THE PROJECT</th>
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<tbody>
<tr>
<td>Do you have any specific concerns associated with the Project (for example: water, soil, pollution, Cultural or historical)?</td>
</tr>
</tbody>
</table>

If you know of anyone else who should be informed about the project, please provide their contact details:

<table>
<thead>
<tr>
<th>Title (Mr/Mrs/Dr/Prof.):</th>
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<tbody>
<tr>
<td>First Name:</td>
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<tr>
<td>Organisation and/or property description (if landowner/lawful occupier)</td>
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</tbody>
</table>

ECC respectfully requests that you please sign this letter and return it to info@eccenvironmental.com to confirm that you have received notification with regard to the above, and to ensure that your comments, concerns or objections are recorded. All comments, queries, and concerns must be received via this I&AP registration form and questionnaire or alternate means. Please note that only registered I&AP’s will included in future correspondence regarding this process.

Signed ..................................  Name ...........................................  Date ............................................

Page 2 of 2
Exploration activities on EPLs 7528 through 7543, 7730, 7731, and 7732 for base and rare metals, precious metals

Details

Proponent: Kuseb Copper Company (Pty) Ltd.
Status: Open for Public Participation
Sector: Mining & Minerals
Country: Namibia

Background Documents

Download

Documents for Public Review

Download  Download
APPENDIX C.3

Commentary log of comments received from registered I&APs.
### Table 8: Log of all Comments and Responses Generated Throughout Public Consultation

<table>
<thead>
<tr>
<th>No.</th>
<th>Chapter</th>
<th>Section</th>
<th>IAP or Stakeholder Comment Received</th>
<th>Stakeholder Details</th>
<th>Response / Clarification</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2</td>
<td></td>
<td>Dear Mr. Kubas,</td>
<td>Ursula Lüsse</td>
<td>Thank you for your email.</td>
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<td></td>
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<td></td>
<td>Dear Ms. Lüsse,</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td></td>
<td>Response from ECC 2.10.2020</td>
<td>2.10.2020</td>
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<td></td>
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<td></td>
<td>Response from ECC 2.09.2020</td>
</tr>
</tbody>
</table>

**Comment 1**

**I&AP / Stakeholder Comment Received:**

- Dear Mr. Kubas,
- Response from ECC 1.3.09.2020

**Stakeholder Details:**

- Ursula Lüsse

**Response / Clarification:**

- Thank you for your email.
- Response from ECC 2.10.2020

**Comment 2**

**I&AP / Stakeholder Comment Received:**

- When will same be listed?

**Stakeholder Details:**

- Mr. Ronald L. Kubas

**Response / Clarification:**

- Thank you for your enquiry.
- Response from ECC 2.09.2020

**Comment 3**

**I&AP / Stakeholder Comment Received:**

- AT 40.3 does not appear on the website.

**Stakeholder Details:**

- Ursula Lüsse

**Response / Clarification:**

- When will same be listed?
- Response from ECC 2.10.2020

**Comment 4**

**I&AP / Stakeholder Comment Received:**

- The project advertised today ECC 1.13.3.09-7.

**Stakeholder Details:**

- Ursula Lüsse

**Response / Clarification:**

- The project advertised today ECC 1.13.3.09-7.
- Response from ECC 2.10.2020

**Comment 5**

**I&AP / Stakeholder Comment Received:**

- The project advertised today ECC 1.13.3.09-7.

**Stakeholder Details:**

- Ursula Lüsse

**Response / Clarification:**

- The project advertised today ECC 1.13.3.09-7.
- Response from ECC 2.10.2020
EXPLORATION ACTIVITIES ON EPL 7528
KOISEB COPPER COMPANY (PTY) LTD
DECEMBER 2020
REV 01
PAGE 80 OF 98

Thank you in advance

What is all about and what to do.

ECC's current public participation phase is to inform interested and affected parties about the project and the assessment. The public is invited to comment on the project and the assessment document, which is available for review at the project site and on the ECC website.

ECC is currently in the public participation phase of the project. Interested and affected parties are encouraged to submit comments to ECC by the end of the public participation period.

ECC has published site notices on the project area and has advertised the project in local newspapers. Interested and affected parties are encouraged to review the assessment document and provide comments to ECC.

ECC is committed to working with interested and affected parties to ensure that their concerns are addressed. ECC has also established a communication plan to ensure that interested and affected parties are kept informed throughout the project.

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ECC is committed to working with interested and affected parties to ensure that their concerns are addressed. ECC has also established a communication plan to ensure that interested and affected parties are kept informed throughout the project.
Dear Madam/Sir,

On Sunday 11 October 2020 late afternoon I was informed of a board next to the road (C23) on my farm that wasn’t there on Saturday morning. I drove there just to see if it was a notification board, announcing the environmental assessment --- Exploration activities on EPLs 7528, 7529, 7530 ect.

Ms Irene Human (12.10.2020)

Response from ECC 13.10.2020

Thank you for your email.

Kind regards

Ursula Lüsse
Well, the letter is a bit wordy.

Kindly find the attached Non-Technical Summary as well.

I am complaining about the notification procedure which is:
- too late and completely out of order
- indirect, impersonal and anonymously
- I am appealing you to inform the public in a way that potentially interested and affected parties can actually be involved. The way it was done now creates the impression of deliberate negligence and causes mistrust that is definitely not in mutual interest.

I recommend that you get addresses of farmers from the NAU or the different farmers associations where the information could be spread with more people knowing what it is all about and what to do.

Thank you in advance.

Kind regards,

Prior to the placement of the site notices in and around the project area, ECC has been in communication with the Farmers Associations for the Gobabis and Witvlei areas to gather information and compile a list of directly affected farm owners. Thus far only a few names could be retrieved, while the respective associations are still busy collecting more details on our behalf. The associations have confirmed that it would distribute the draft environmental impact assessment document and management plan to its members once it is received.

Although the registration schedule has been extended to 21 days to receive comments and any affected parties should be informed through the registered interested members once it is received.

Would you please inform us of the direct environmental impact our project will have on the farmers and the association has confirmed that it is aware of this and is still busy collecting more details on affected farmers. This time your letter, which is addressed to me, I am appealing you to inform the public in a more transparent and accountable manner.

I am compiling a list of all Interested and Affected Parties (I&AP).

In the meantime, we have registered you as an I&AP for the project and will appreciate if you could provide us with details of your neighbouring farmers so that we can keep them informed throughout the process.

We are in touch with regulators and stakeholders to prepare a final version of the Environmental Impact Assessment (EIA) document.

Thank you in advance.
For any further information, do not hesitate to contact us.

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For any further information, do not hesitate to contact us.
Good day Ms. Nangula

The board of the Nina Farmers Association held yesterday its meeting. It was decided that we are going to inform our members. We cannot speak for those who are not members of our association and therefore you need to follow up your information with your neighbours.

Thank you.

Iris Stehn

---

**Messages: 7**

Dear Ms. Amwele

We received the attached information from our Farmer's Union on 15/10/2020. Please note that I direct this to you just in an effort to understand what the implications of this may be and that by no means are we trying to just be "difficult". Although I can only speak from my own viewpoint and do not have authorisation to do so on behalf of others, I wish to mention that we are not in the area we would like to move it to a more suitable location; however, if you would or someone would like to approach us if you would or some one would like to move it to a more suitable location.

We are not in the area we would like to move it to a more suitable location; however, if you would or someone would like to move it to a more suitable location.

In response to point 1:

- Thank you for informing us. This is the first time that we had any clarifications or responses to each individual point raised following below.

1. **Response to point 2:**

- All comments received after the 28th of September are still valid and will be considered.

2. **Response to point 2:**

- The poorly chosen site location for this sign, we would like as many affected people to see it as possible. It would be appreciated if someone would like to move it to a more suitable location for this sign. We would like to move it to a more suitable location for this sign.

3. **Response to point 2:**

- Although I can only speak from my own viewpoint and do not have authorisation to do so on behalf of others, I wish to mention that we are not in the area we would like to move it to a more suitable location.

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Thank you.

I&AP COMMENT (Mr. Hermann Kuschke) ECC RESPONSES

Mr. Hermann Kuschke

16.10.2020

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Thank you.

- For following up your information with your members of association and thanking you.

We can't speak for those who are not members of the board of the Nina Farmers Association and therefore you need to follow up your information with your member of association and thanking you.

What is going to inform our members.

---

Good day Miss Amwele

---

ECC DOCUMENT CONTROL - ECC - 113-309-REP 98-0

DECEMBER 2020

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EXPLORATION ACTIVITIES ON EPL 7528
<table>
<thead>
<tr>
<th>Response to point</th>
<th>Date</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Response to point 1:</td>
<td>19th October 2020</td>
<td>Kuiseb Copper Company confirmed that there will be no exploration activities 60km from us.</td>
</tr>
<tr>
<td>2. Response to point 2:</td>
<td>19th October 2020</td>
<td>The 21-day period since 28/9/2020 is still applicable. Kuiseb Copper Company is a Namibian company with sound exploration experience and knowledge.</td>
</tr>
<tr>
<td>3. Response to point 3:</td>
<td>19th October 2020</td>
<td>The details of the proposed project will be further explained in the final report.</td>
</tr>
<tr>
<td>4. Response to point 4:</td>
<td>19th October 2020</td>
<td>Kuiseb Copper Company is a Namibian company with sound exploration experience and knowledge. The company is only interested in base metals (Copper and Silver).</td>
</tr>
</tbody>
</table>

Kind regards,

Hermann Kuschke

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2. Response to point 3: Kuiseb Copper Company confirmed that there will be no exploration activities 60km from us. Apparently, information on this has been incorporated into the assessment reports. We really value stakeholder input, so we keep these windows open to allow for continued engagement.

3. Response to point 3: The details of the proposed project will be further explained in the final report. Kuiseb Copper Company is a Namibian company with sound exploration experience and knowledge. The company is only interested in base metals (Copper and Silver).
EXPLORATION ACTIVITIES ON EPL 7528
KUISEB COPPER COMPANY (PTY) LTD

DECEMBER 2020

REV 01

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EXPERIENCES

1. FML/00361/00004, Maroelana (previous owner S.M. Hylton); 2. G. Ntloako, Deeds ID FML/00449 and FML/00800, Deeds ID FML/00495 (previous owner P.G. Pretorius); 3. R. Venter, Deeds ID FML/00417 and FML/00579 (previous owner J. Stoffel); 4. W.P. Michau, Deeds ID FML/00469/00003, Hertzog (previous owner W.S. Michau) and Deeds ID FML/00590, Tunis (previous owner W.S. Michau); 5. C.J. Labuschagne, Deeds ID FML/00408/00001, Auheib (previous owner P.G. Pretorius).

Please register all the above-mentioned parties as relevant I&APs (contact details will follow below)

1. H.S. van der Schyff: javvds@gmail.com & schyfies@iway.na
2. B. Venter: venter@iway.na
3. D.F. du Plessis: duples@iway.na
4. W.P. Michau: skaiarabians@iway.na
5. C.J. Labuschagne: labuschagnestoffel@gmail.com

A. None of the above-mentioned parties have received any communication regarding this application directly from ECC. Note that all the property owner information, except that of D.F. du Plessis, is wrong on the excel sheet. Please allow us to explain our approach:

o Firstly, we access a database of farm owners and details from the Ministry of Land Reform (Deed office) – unfortunately, it is often the case that the information on this governmental database is not accurate – but this is always our starting point. This is why some of the details in our excel are incorrect as they are sourced directly from the Government database.

o Secondly, we then try and verify this list and amend such details with entities/organizations on the ground through a public participation process (this is where we are currently in).

o We then place adverts in the newspapers as another means to try and establish a connection to the above-listed individuals on the ground.

Please understand that at no point in time is it possible for the government to send out directly from the government is any of the details in our excel are incorrect. This is why we are very careful in sourcing our information from the relevant government database.

Please register all the above-mentioned parties.

FRL/0400/00000, African (previous owner)
5. C. Laborde (deceased), Deeds ID
W.S. Michel

Please allow us to explain our approach:

some of the tools are more effective than others.
Exploration Activities on EPL 7528

KUISEB COPPER COMPANY (PTY) LTD

DECEMBER 2020

Response to point D: Exploration programs generally commence with geological analytical activities i.e. desktop analysis of geological aerial maps, geological mapping, aerial surveys, soil sampling, etc. Depending on the findings from these initial activities more invasive methods (i.e. drilling) may be required to verify results and to narrow down the areas of interest for further investigation. As drilling is a costly and time-consuming process, it is prudent to conduct a thorough assessment of the potential impact of this activity on the environment and the surrounding communities. The exploration program should be designed to minimize the impact on the environment and to ensure that the project is conducted in a sustainable manner. ECC is committed to conducting its exploration activities in an environmentally responsible manner and to ensuring that the activities are conducted in a way that minimizes any potential impact on the environment.

Response to point E: ECC intends to utilize the information gathered during the exploration activities to identify potential mineral deposits and to assess the environmental impact of any proposed activities. This information will be used to develop an appropriate plan of action to ensure that the activities are conducted in a way that minimizes any potential impact on the environment. ECC is committed to conducting its exploration activities in an environmentally responsible manner and to ensuring that the activities are conducted in a way that minimizes any potential impact on the environment.
Environmental that some potential vegetation loss due to possible tracks creation; the vegetation is expected to recover fully during ensuing rain seasons.

Please elaborate on this point in the case where trenching might occur and whether the restoration of the environment will be as simple as recovering during ensuing rain seasons, seeing that these properties affected are fully dependent on vegetation for the successful operation of the farms.

F. It is mentioned that the use of resources, which include surface and groundwater, might be utilized during the exploration activities. Please indicate how the proponent is planning to approach this aspect.

G. It is mentioned under paragraph 2.6.2 that minor risk of loss of contaminant of hydrocarbon, chemical or drill fluids from exploration activities potentially leading to localised ground contamination; this aspect will be controlled. Please indicate how this potential impact will be controlled and mitigated.

H. Under paragraph 3, which discusses the alternatives to the project, it is written that the activities shall be specific to the EPLs, available to all registered I&APs for review and commentary in due course. The impacts are developed and assigned mitigation measures as the project progresses and as more information becomes available to us. Impacts are identified by ECC and also by the community in the consultation phase – why we are going to such lengths to make contact with them.

Response to point E:
During exploration activities, the first option is for the proponent to use existing roads or tracks to access work sites. However, sometimes drill sites are required in areas without road access, in which case new temporary tracks need to be created. To do this, minimal vegetation will be cleared if necessary and to required standards. The Environmental Management Plan (EMP) provides recommendations in this regard to preserve root systems for example and to preserve vegetation. These recommendations will be communicated to the farmer and agreed on, and all relevant permits will be obtained.

Response to point F:
If water is to be obtained directly from a farm owner's borehole a signed agreement between the farm owner and the proponent will ensue. Access agreements will also be formalised and signed between both parties. All relevant permits will be obtained.
Response to point G:
The Environmental Management Plan will contain practical measures to be implemented on site to ensure proper containment structures are put in place as well as monitoring and management activities to ensure compliance to such measures. The Environmental Authority has written that the Environmental Impact Assessment Report will contain details of all proposed activities and their potential impacts.

Response to point H:
The EPLs have been granted by the Ministry of Mines and Energy (MME). Alternatives are predominantly operational and technical alternatives.

Response to point I:
The Environmental Impact AssessmentReport includes a stage for public participation, where the public will have the opportunity to provide comments and suggestions. The process is currently in progress.

Response to point J:
If they are required, details of field camps will be contained in the assessment report. Please refer to chapter 4 within this assessment report.

Response to point K:
The proponent aims to buy water from the local authority as their first point of interest. Abstraction via private boreholes are subject to a mutually beneficial written agreement between the farm owner and the proponent. Should new boreholes be sunk, this will be subject to the approval of the Department of Agriculture, Water and Land Reform.

Response to point L:
Yes, we certainly intend to have meetings with the stakeholders.
The 22.10.2020

P.S. The meeting with the NAU was rescheduled for 22.10.2020 in Windhoek.

Dear Mrs. Venter,

Thank you for your email in appointment has been made.

An initial meeting was held with the Namibia Agricultural Union on Thursday, 22 October 2020.

Mrs. Erika von Gierszewski
Nambia Agricultural Union
16.10.2020

Response from ECC on 19.10.2020

Dear Mrs. Erika,

Thank you for your email, an appointment has been made with Mr. Roelie Venter for this coming Thursday at 10am in Windhoek.

Our office is located at 1 Jan Jonker Way Klein Windhoek.

With kind regards,

Jessica Bezuidenhout (Mooney)

P.S. The meeting with the NAU was rescheduled for 22.10.2020 in Windhoek.
Hi Lovisa,

This email only has to do with one property - Ivanhoe, D.F. du Plessis (FML/00092). I've attached a map to this email for your reference. You will notice that the property in question overlaps a map to this email for your reference. You will notice that the property

Thank you for your enquiry (as per the attached

Response from ECC on 23.10.2020

23.10.2020

Mr. Jandre van der Schyff

Mr. Jandre van der Schyff

Thank you for your reply, we have established contact with the unions.

Once we have established contact with the unions, we will have a meeting to introduce the process in person and address all concerns that any farm owner may have with regards to this project.

Meeting is scheduled to take place on

Yesterday.

We had a meeting with Mr. Venet from the NAU. In that meeting, it was resolved that ECC would attend the Gobabis and Windhoek Regional Agriculture Union's (RAU) remaining quarterly meetings to introduce the EIA process in person and address all concerns that any farm owner may have with regards to this project.

Thank you for elaborating on the concerns we've raised thus far.

Just to clarify, are there going to be a public meeting scheduled to directly consult property owners as well?

Regards

Mr. Jandre van der Schyff

23.10.2020

Dear Mr. Venet,

Thank you for your reply. We had a meeting with Mr. Venet from the NAU. In that meeting, it was resolved that ECC would attend the Gobabis and Windhoek Regional Agriculture Union's (RAU) remaining quarterly meetings to introduce the EIA process in person and address all concerns that any farm owner may have with regards to this project.

Thank you.

Mr. Jandre van der Schyff

23.10.2020

Thank you for your query (as per the attached email).

The licence area has been granted by the Ministry.

Thank you for your query (as per the attached email).
<table>
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<th>Name</th>
<th>Thank you for your understanding. If anything is not clear, please don’t hesitate to ask.</th>
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The proposed exploration program will initially focus on areas of potential interest. The data obtained from the aerial survey will be used to prioritize areas for further investigation. If there are any areas that are not suitable for exploration, they will be dropped from the project.

The property owner has asked whether the proponent will consider removing that small part of the PR area from the property, excluding the property from the PR application? The area is ±290ha.

The proposed exploration program will initially include an airborne survey which will then allow the client to zoom in on areas of potential interest. Until the airborne survey work is completed, it will be difficult to determine which areas are of interest or not.

We thank you for your feedback, Lovisa. We'll wait for the results of the aerial survey then.

Thank you.

Lester Harker

Good morning Lester,

Thank you for the Farm Details – Kuiseb Copper Company. You will note that there are numerous farms whose owners are non-members of the National Agricultural Union. The spelling of some farm names are wrong and this shows as non-members on our member list. However, I think there are numerous farms whose owners are not members of the NAU. Nevertheless, I think the property owner has asked whether the proponent will consider removing that small part of the PR area from the property, excluding the property from the PR application? The area is ±290ha.

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We thank you for your feedback, Lovisa. We'll wait for the results of the aerial survey then.

Thank you.

Lester Harker

Response from ECC on 30.10.2020

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The proposed exploration program will initially focus on areas of potential interest. The data obtained from the aerial survey will be used to prioritize areas for further investigation. If there are any areas that are not suitable for exploration, they will be dropped from the project.

We thank you for your feedback, Lovisa. We'll wait for the results of the aerial survey then.

Thank you.

Lester Harker
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</tr>
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<tbody>
<tr>
<td>Response from ECC 11.11.2020</td>
<td>Dear Mr. Marais,</td>
<td>Dear Mr. Marais,</td>
<td>Response from ECC 23.11.2020</td>
</tr>
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<td>GOOD EVENING,</td>
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</tr>
<tr>
<td>Thank you for your email and telephone conversation earlier.</td>
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**COMMENTS RECEIVED BASED ON THE DRAFT SCOPE/SCOPING REPORT AND EMP PROVIDED TO REGISTERED INTERESTED AND AFFECTED PARTIES (EIA's)**

- Please do not hesitate to contact me should you require any further assistance.
- Kind regards,

**Please call me urgently.**

**Mr. Jean Marais**

**081 150 0117**

**ECC**

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**EXPLORATION ACTIVITIES ON EPL 7528**

**KUISEB COPPER COMPANY (PTY) LTD**

**DECEMBER 2020**

**REV 01**

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