EXPLORATION 18 (PTY) LTD

SCOPING REPORT (INCLUDING IMPACT ASSESSMENT) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 6424, 6722, 7031, 7183 AND 8237 NEAR KHORIXAS IN THE KUNENE REGION

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Namisun cannot verify all technical information contained in this report, and relies on the information shared by the Exploration 18 (Pty) Ltd Management Team as being accurate.

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EXECUTIVE SUMMARY

1. INTRODUCTION

Exploration 18 (Pty) Ltd has exclusive agreements with the owner of Exclusive Prospecting Licence (EPL) 6424, Festus Haoseb, the owner of EPL 6772, Tuhafeni Ndinelao Nashitati, the owner of EPL 7031, Di-Tani Investments (cc), the owner of EPL 7183, Hejo Investments (cc), and the owner of EPL 8237, Gabriel Nakatati, to do exploration within their EPL boundaries. EPL 6424 is located to the northwest of Khorixas and overlaps partly with the townlands as well as the western part of the Fransfontein Townlands. EPL 7031 is located to the south of Khorixas and overlaps with the southern parts of the Khorixas Townlands. EPL 6772 is located 20 km southeast of Khorixas and adjacent to EPL 7031. EPL 8237 is located west of EPL 6772 and south of EPL 7031, approximately 15 km southwest of Khorixas on both sides of the C35 road towards Uis. EPL 7183 is located 40 km southwest of Khorixas and directly south of EPL 8237, also on both sides of the C35 road (see Figure A). All five EPLs are located on communal land, constituting a total surface area of approximately 127,000 ha, but exploration activities will be limited to targeted areas which cover a combined surface area of approximately 10,500 ha.

Eleven target areas were identified (see Figure A):

- A1 – Bella Vista
- A2 – Inhoek
- A3 – Belmont
- A4 – Dieprivier
- A5 – Delta
- A6 – Halt
- A7 – Franzfontein
- A8 – Vaalhoek
- A9 – Groenvlei
- A10 – Weltevrede
- A11 – Lusberg

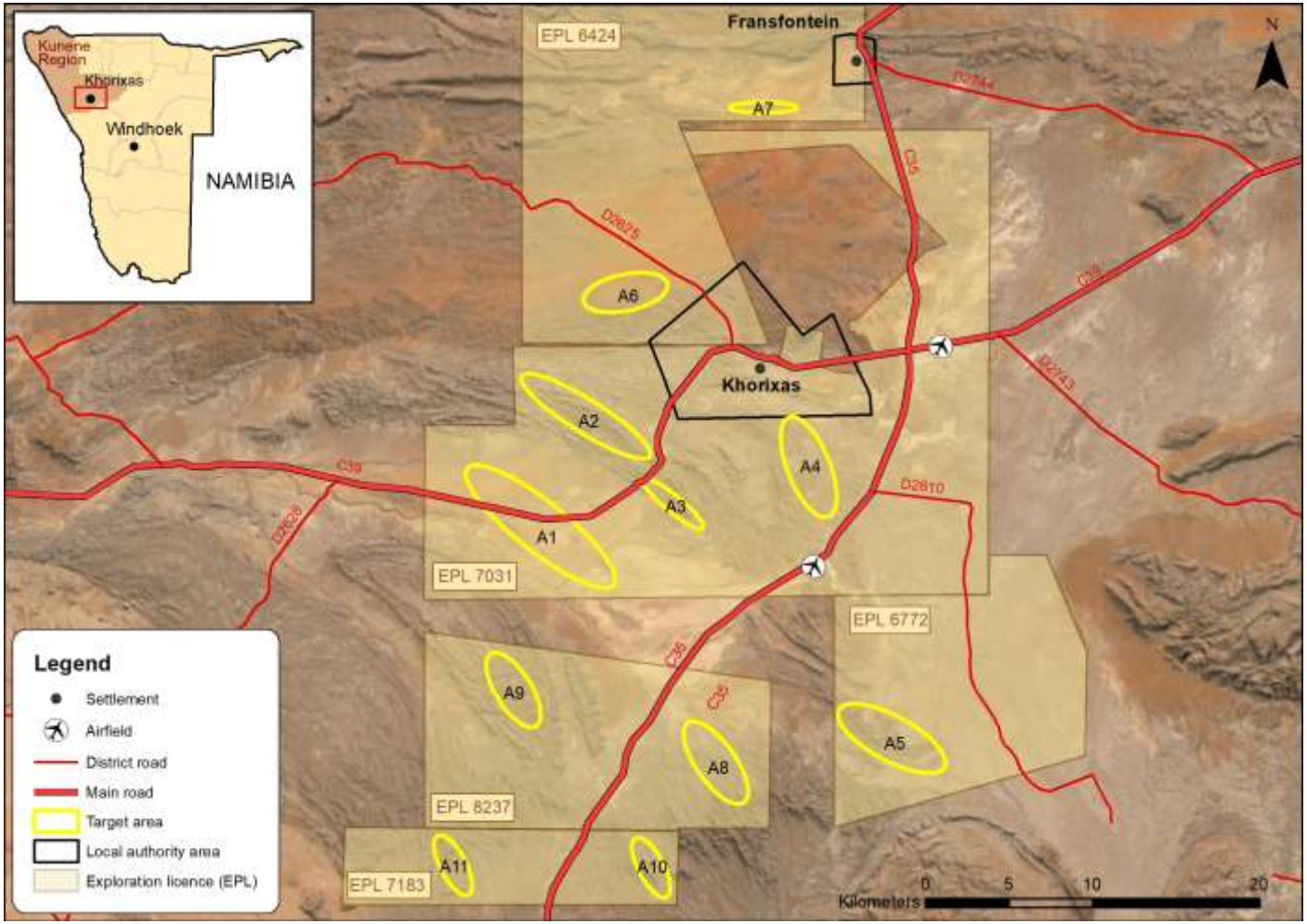


FIGURE A: LOCALITY MAP OF EPL 6424, 6772, 7031, 7183 AND 8237

The exploration activities will include geological mapping; rock chip and soil sampling within the targeted areas, and drilling (depending on the results of the aforementioned activities).

Prior to the commencement of the exploration activities, environmental clearance is required from the Department of Environmental Affairs (DEA) of the Ministry of Environment, Forestry and Tourism (MEFT), based on an approved Environmental Impact Assessment (EIA) process, in terms of the Environmental Management Act, No. 7 of 2007 and its associated regulations of 2012.

Namisun Environmental Project and Development (Namisun), an independent firm of environmental consultants based in Namibia, has been appointed by Exploration 18 (Pty) Ltd to undertake and manage the EIA process.

2. EIA PROCESS

EIAs are regulated by the MEFT in terms of the Environmental Management Act, No. 7 of 2007. This act was gazetted on 27 December 2007 (Government Gazette No. 3966) and its associated regulations were promulgated in January 2012 (Government Gazette No. 4878).

Prior to the commencement of the proposed exploration activities, an environmental clearance is required for each one of the five EPLs (i.e., five separate applications) from the DEA of the MEFT, based on an approved EIA process, in terms of the Environmental Management Act, No. 7 of 2007.

This EIA process is conducted in terms of the Environmental Management Act, No. 7 of 2007 and its associated EIA regulations. This process includes a screening phase and a scoping phase, an impact assessment and Environmental Management Plans (EMPs) for EPL 6424, 6772, 7031 7183 and 8237.

This EIA process commenced with a focus on three EPLs, namely EPL 6424, 6772 and 7031. Since the initial meeting with stakeholders in Khorixas on 26 February 2021 two more proximate EPLs were added to the project. Permission for the inclusion of the two EPLs in the assessment process was granted by the DEA of MEFT. To make matters clear, clear communication with all parties was emphasised, including an additional meeting with stakeholders in Khorixas on 21 May 2021.

This report is the Scoping Report, with impact assessments included. The main purpose of this report is to provide information relating to the proposed activities and to indicate which environmental aspects and potential impacts have been identified during the screening and

scoping phases. The report consists of information obtained from site observations, and the results of stakeholder consultations. The potential impacts of the proposed exploration activities could therefore be assessed, and the assessment is also included in this report. The potential impacts were cumulatively assessed, taking the existing environment and other activities and facilities associated into consideration, where relevant.

It is thought that this Scoping Report (including an assessment of impacts), together with an EMP for each of the five EPLs, will provide sufficient information for the MEFT to make an informed decision regarding the proposed project, and whether an environmental clearance certificate (ECC) for each of the EPLs can be issued or not.

The above-mentioned EIA process is explained diagrammatically in Figure B.

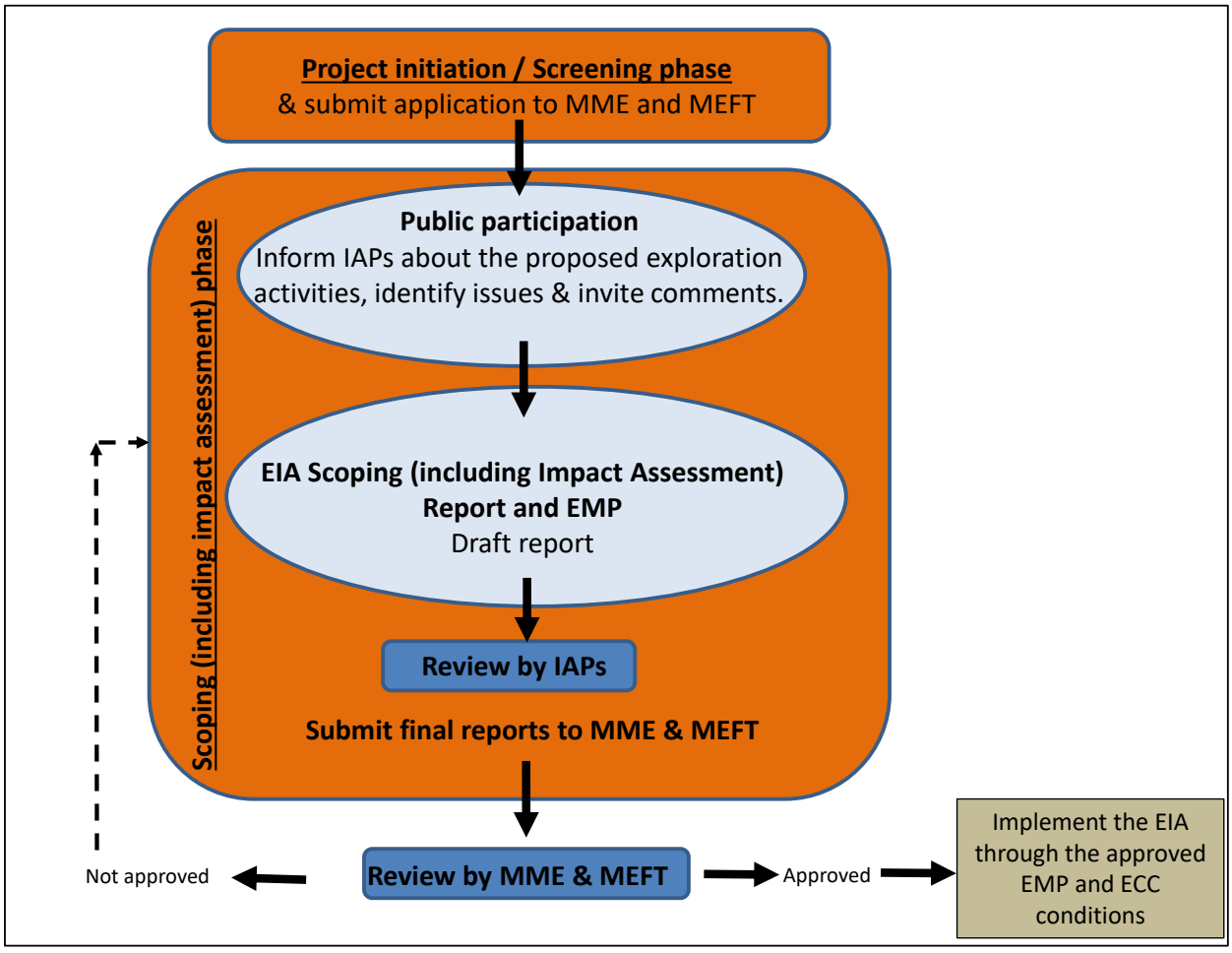
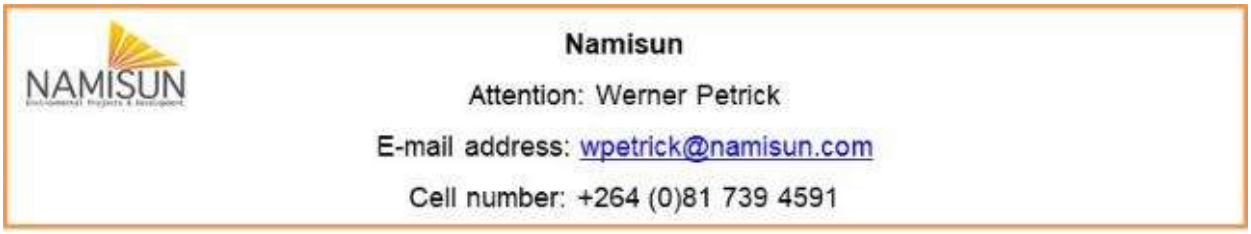


FIGURE B: THE EIA PROCESS

Opportunity to comment

*Interested and Affected Parties (I&APs) were invited to comment on this EIA Scoping Report and the accompanying EMPs, which were available for a review and comment period from **17 May** to **17 June 2021**. Comments had to be sent to Namisun at the address, telephone number, or e-mail address shown below by **no later than 17 June 2021**.*



3. DESCRIPTION OF THE PROPOSED EXPLORATION ACTIVITIES

Exploration 18 (Pty) Ltd proposes to undertake exploration activities on EPL 6424, EPL 6772, EPL 7031, 7183 and EPL 8237 for base and rare metals, industrial minerals and precious metals. The exploration activities shall commence as soon as an ECC has been issued by MEFT. However, before any exploration activities can be carried out access agreements, as required by Section 52 of the Minerals Act, will be entered into between Exploration 18 (Pty) Ltd and the relevant landowners. The negotiations regarding access agreements fall outside of the ambit of the EIA process.

The proposed exploration activities on each of the five EPLs will include:

- Phase 1:
    - Geological studies and mapping: Review of geological maps of the area and onsite ground traverses and observations. Small samples of rock chips may be collected for further analysis.
    - Soil Sampling: Small pits (±30 cm x 30 cm) will be dug and sample material will be collected in the target areas.

- Phase 2:
  Depending on the Phase 1 results, the drilling of boreholes might be undertaken in target area(s).
    - Reverse Circulation (RC) drilling: Holes are drilled, and drill samples collected for analysis. Small areas of land within the target areas (±15m x 15m) per hole will be used for drill rig establishment and environmental containment. These areas will be rehabilitated once drilling has been completed.

- Depending on the results, exploration activities may progress to ground geophysics and diamond drilling.

3.1 Exploration activities

Geological studies and field mapping

This includes the further review of geological maps of the area and onsite ground traverses and observations. Small samples of rock may be collected for further analysis. During this phase, Exploration 18 (Pty) Ltd does not propose to conduct any "intrusive activities" – i.e., all likely targeted areas on the EPLs could be reached without creating new access roads or any cut lines and having to remove trees / vegetation.

Soil sampling

With guidance from the geological mapping, samples of soil are collected and sent for geochemical major and trace element analysis to determine if sufficient quantities of base metals are present. These analyses are conducted by analytical chemistry laboratories.

Small pits (±30 cm x 30 cm) will be dug and sample material collected in the target areas.

Drilling

Depending on the Phase 1 results, drilling of boreholes might be undertaken in target area(s).

Exploration drilling is the process of removing rock samples from an area, where mineralisation is suspected. Holes will be drilled and drill samples collected for analysis of trace elements. There are various drilling methods available and Exploration 18 (Pty) Ltd will utilise RC drilling initially. Depending on the results, it may progress to diamond drilling.

A typical drilling pad consists of a drill-rig, an area where the drill core and geological samples can be stored and a storage area for drill equipment, fuel and lubricants. The drilling pad, usually 15 m x 15 m in size, is cleared and levelled, barricaded, and off-limits to those not part of the exploration team.

3.2 Exploration Machinery / Vehicles and support

A sequential drilling program is planned – exploration in one EPL will be completed first before the focus shifts to another EPL. The following machinery / vehicles will be utilized in the drilling program per target area:

- 3 x pick-up trucks (bakkies).

- 1 x truck-mounted RC rig.
- 1 x truck-mounted compressor.

It is anticipated that the following personnel will be employed to carry out the proposed exploration activities:

- 2 x geologists
- 8 x field assistants
- 6 x drilling operators (if drilling is justified by the sampling results)

The exploration team will reside in existing houses in Khorixas. Staff will travel to site and back on a daily basis.

Nobody will stay onsite.

3.3 Power Supply

The various machinery and equipment required for drilling have their own power supplies and or fixed generators.

3.4 Water supply

Drinking water will be transported from Khorixas to the field daily. If the project progresses to diamond drilling (depending on the results from RC drilling), a water tanker will transport water from Khorixas. In such a case the necessary arrangements with the local authority will be made.

3.5 Fuel Supply and Storage

Diesel is the main consumable and will be required for the generators as well as the vehicles used during the exploration activities. All vehicles will make use of the fuel station(s) in Khorixas and no fuel will be stored onsite.

3.6 Access Routes

Existing access routes and roads will be used during the exploration activities, as far as possible. The main access to the target areas will be via the C35, C39 and D2625 roads. In liaison with landowners, local tracks will be used to access more specific target areas. No new roads will be constructed. Access agreements, as required by Section 52 of the Minerals Act, will be entered into between Exploration 18 (Pty) Ltd and the relevant landowners prior to carrying out any exploration activities on the five EPLs.

3.7 Chemicals and hazardous substances (i.e., fuel)

Diesel is the main consumable and will be required for the generators as well as vehicles used during the exploration activities. No new fuel (petrol or diesel) storage facilities will be erected and the fuel station(s) in Khorixas will be used for supply. No oil, grease or lubricants will be stored onsite either.

3.8 Waste management

The following types of waste will be generated during the exploration activities, in relatively small volumes:

- Domestic waste (non-hazardous).
- Industrial waste (i.e., hydrocarbon contaminated material / soil) (hazardous)

Domestic waste will be contained in a manner that there can be no discharge of contamination to the environment and will be removed from site daily, for disposal in a designated landfill site. Recyclable items are to be sorted and stored in temporary containers and removed to relevant recycling centres (where possible).

Potential hydrocarbon spills from vehicles and drilling equipment, as well as refuelling activities might lead to soil contamination and needs to be treated as a hazardous waste if not bio-remediated. Drip trays will be placed under all stationery vehicles and machinery, including the drilling equipment. Any oil spill will be scooped into bags and taken to a permitted disposal site.

3.9 Sanitation

Once a drilling site is established, ablution facilities with portable toilets will be placed onsite to ensure that sewage is contained and disposed of appropriately.

3.10 Fire Management

Drill pads will be cleared of grass, dry wood and anything that might increase the risk of starting an unintentional fire. To avoid starting a fire, smoking will only be allowed in dedicated smoking areas with a sand filled drum or similar container for disposal of cigarette butts. No open fires for cooking will be permitted to discourage wood collection and possible fires. Gas stoves must be used when required. Furthermore, fire extinguishers will be available onsite at all times.

3.11 Rehabilitation

Once the proposed exploration activities have been concluded on a specific site, the impacted site will be rehabilitated. This will ensure a program of progressive rehabilitation, also in accordance with the requirements of the EMP.

4. IDENTIFICATION OF POTENTIAL ENVIRONMENTAL ASPECTS AND IMPACT ASSESSMENT

The proposed exploration activities on EPL 6424, 6722, 7031, 7183 and 8237 have the potential to impact on the environment. Environmental aspects and potential impacts were identified by the environmental team during the screening and scoping phases, in consultation with I&APs. Given the non-intrusive nature of the proposed activities, within specific demarcated areas, and taking the existing environment into consideration, the potential impacts were qualitatively assessed by Namisun.

Table A provides a summary of the exploration activities, associated environmental aspects and potential impacts on the environment and also a qualitative assessment of these impacts (before and after mitigation). The various management and mitigation measures relating to all the proposed exploration activities are included in the EMP of each EPL.

TABLE A: ENVIRONMENTAL ASPECTS AND POTENTIAL IMPACTS ASSOCIATED WITH THE EXPLORATION ACTIVITIES ON EPL 6424, 6722, 7031, 7183 AND 8237

Activity	Aspect	Potential Environmental Impact	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance
Geological studies, field mapping, and soil sampling									
Field mapping, ground surveys and rock and soil sampling	Biodiversity	Potential impact on fauna and flora (General disturbance and clearing of vegetation)	Without	M	M	L	M	M	**M**
			With	L	L	L	L	L	**L**
	Air quality	Increase in dust levels (nuisance and health impacts)	Without	**L**	**L**	**L**	**L**	**M**	**L**
			With	L	L	L	L	L	**L**
	Heritage	Activities could result in possible damage to / destruction of heritage resources.	Without	**M**	**VH**	**L**	**VH**	**M - H**	**M-H**
			With	**L**	**L**	**L**	**L**	**L**	**L**
Drilling									
Drill site establishment: • Access the drill site (possibly creating a new access track) • Set-up drilling machine with drip trays and groundsheets • Establish temporary safety fencing around the drill site	Noise	Noise generated by the establishment of access tracks and drill site.	Without	**L-M**	**L**	**L**	**L**	**L-M**	**L**
			With	**L**	**L**	**L**	**L**	**L**	**L**
	Biodiversity	Potential impact on fauna and flora. (General disturbance and clearing of vegetation) Drilling contractors and employees that are not well supervised can impact on the biodiversity through illegal collection of firewood and organisms, poaching, road kills, etc.	Without	**M**	**M**	**M**	**M**	**M**	**M**
			With	**L**	**L**	**L**	**L**	**L**	**L**

Activity	Aspect	Potential Environmental Impact	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance
• Set-up of portable toilet and ablution facilities		Loss of economic function of disturbed area during exploration activities and potential loss of land capability.							
		Site clearance may allow for the establishment of invasive plants in the area.	Without	**L**	**M**	**M**	**M**	**M**	**M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
	Land use	Loss off land capability due site clearance.	Without	**M**	**M**	**L**	**M**	**M**	**M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
	Heritage	Exploration activities could result in possible damage to or destruction of heritage resources.	Without	**M**	**VH**	**L**	**VH**	**M - H**	**M-H**
			With	**L**	**L**	**L**	**L**	**L**	**L**
Drilling	Spillages of hydrocarbons, lubricants, or possible spills from portable toilet facilities	Soil pollution	Without	**L**	**L**	**L**	**L**	**L**	**L**
			With	**L**	**L**	**L**	**L**	**L**	**L**
		Surface water contamination	Without	**M**	**M**	**M**	**M**	**L-M**	**L-M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
		Groundwater could become polluted due to pollutants entering aquifers via surface water infiltration.	Without	**M**	**M**	**M**	**M**	**M**	**M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
	Dust generation through using access tracks. Air pollution from exhaust fumes.	Air quality deterioration. Increase in dust levels (nuisance and health impacts)	Without	**M**	**L**	**L-M**	**L-M**	**L-M**	**L-M**
			With	**L**	**L**	**L**	**L**	**L**	**L**

Activity	Aspect	Potential Environmental Impact	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance
	Dust generation through drilling activities								
	Noise generation	Noise generated by the drilling activities could disturb nearby residences (nuisance).	Without	**M**	**L**	**L-M**	**L-M**	**L-M**	**L-M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
	Land use	Potential loss of land use and capability (very limited area) due to a combination of the above-mentioned impacts. Potential loss of wildlife.	Without	**M**	**M**	**L**	**M**	**M**	**M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
Relevant to all activities									
All exploration activities	Socio-economic and community safety	Inconvenience to residents and impacts on way of life	Without	**H**	**H**	**L**	**H**	**L-M**	**M-H**
			With	**L**	**L**	**L**	**L**	**L**	**L**
	Waste Management	The dumping of general waste within the exploration area and drilling sites could prove hazardous to wildlife and livestock, as well as impede agricultural production. This could also lead to general environmental degradation and visual impacts.	Without	**M**	**L**	**M**	**M**	**M**	**M**
			With	**L**	**L**	**L**	**L**	**L**	**L**
		Health and safety issues	Without	**L-M**	**L-M**	**L**	**L-M**	**M**	**L-M**

Activity	Aspect	Potential Environmental Impact	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance
	Social – provision of portable toilet and ablution facilities		With	**L**	**L**	**L**	**L**	**L**	**L**
Closure and rehabilitation of drill site									
Remove all waste and equipment from site. Rip compacted areas (including access roads and paths).	Biodiversity Visual	Return site to natural state. No overall impacts.	**N/A**						

With reference to Table A, it can be seen that the activities and facilities associated with the exploration activities are unlikely to have high significant impacts on the environment if mitigation measure are implemented in accordance with the EMP. Some of these impacts might have a moderate impact without any mitigation.

5. ENVIRONMENTAL MANAGEMENT PLANS

An EMP for each of the EPLs provides the relevant management and mitigation measure relating to the proposed exploration activities of Exploration 18 (Pty) Ltd on EPL 6424, 6722, 7031, 7183 and 8237.

The aim of the EMPs is to detail the actions required to effectively implement mitigation and management measures. These actions are required to minimise negative impacts and enhance positive impacts associated with the operations.

The EMPs give the commitments, which form the environmental contract between Exploration 18 (Pty) Ltd and the Government of the Republic of Namibia, represented by the MEFT.

- The management measures proposed to mitigate the potential impacts are detailed in the action plans of the EMPs.

6. WAY FORWARD

The way forward is as follows:

- MME and MEFT to review the final Scoping Report and the accompanying EMPs and provide a record of the decision.

7. ENVIRONMENTAL IMPACT STATEMENT AND CONCLUSIONS

The environmental aspects associated with the proposed exploration activities on EPL 6424, 6722, 7031, 7183 and 8237 have been successfully identified and assessed as part of this EIA Scoping process. Relevant mitigation measures have been provided and are included in the EMPs that accompany this Scoping Report.

Namisun believes that a thorough assessment of the proposed project activities has been achieved and that an ECC could be issued on condition that the management and mitigation measures in the EMPs be adhered to by Exploration 18 (Pty) Ltd during the implementation of all associated exploration activities.

SCOPING REPORT (INCLUDING IMPACT ASSESSMENT) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 6424, 6722, 7031, 7183 AND 8237 NEAR KHORIXAS IN THE KUNENE REGION

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ACRONYMS AND ABBREVIATIONS

Below a list of acronyms and abbreviations used in this report.

Acronyms / Abbreviations	**Definition**
DEA	Department of Environmental Affairs
EAP	Environmental Assessment Practitioner
EAPAN	Environmental Assessment Professionals Association of Namibia
ECC	Environmental Clearance Certificate
EPL	Exclusive Prospecting License
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ha	hectares
MET	Ministry of Environment and Tourism
MEFT	Ministry of Environment, Forestry and Tourism
ML	Mining Licence
MME	Ministry of Mines and Energy

SCOPING REPORT (INCLUDING IMPACT ASSESSMENT) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 6424, 6772, 7031, 7183 AND 8237 NEAR KHORIXAS IN THE KUNENE REGION

1 INTRODUCTION

1.1 BACKGROUND

Exploration 18 (Pty) Ltd has exclusive agreements with the owner of Exclusive Prospecting Licence (EPL) 6424, Festus Haoseb, the owner of EPL 6772, Tuhafeni Ndinelao Nashitati, the owner of EPL 7031, Di-Tani Investments (cc), the owner of EPL 7183, Hejo Investments (cc), and the owner of EPL 8237, Gabriel Nakatati, to do exploration within their EPL boundaries.

EPL 6424 is located to the northwest of Khorixas and overlaps partly with the Khorixas Townlands as well as the western part of the Fransfontein Townlands. EPL 7031 is located to the south of Khorixas and overlaps with the southern parts of the Khorixas Townlands. EPL 6772 is located 20 km southeast of Khorixas and adjacent to EPL 7031. EPL 8237 is located west of EPL 6772 and south of EPL 7031, approximately 15 km southwest of Khorixas on both sides of the C35 road towards Uis. EPL 7183 is located 40 km southwest of Khorixas and directly south of EPL 8237, also on both sides of the C35 road (Figure 1).

All five EPLs are located on communal land. EPL 6424 covers a surface area of 28,287.5 hectares (ha), EPL 6772 an area of 17,136.3 ha, EPL 7031 an area of 53,100 ha, EPL 7183 an area of 8,469.61 ha, and EPL 8237 an area of 19,947.53 ha. Combined, the project covers a total surface area of 126,940.94 (i.e., approximately 127,000) ha.

Exploration activities will be limited to eleven target areas with a combined surface area of 10,368 (i.e., approximately 10,500) ha. The targeted areas are:

- A1 – Bella Vista (2,433 ha)
- A2 – Inhoek (1,313 ha)
- A3 – Belmont (339 ha)
- A4 – Dieprivier (1,188 ha)
- A5 – Delta (1,399 ha)
- A6 – Halt (822 ha)
- A7 – Franzfontein (190 ha)
- A8 – Vaalhoek (995 ha)
- A9 – Groenvlei (799 ha)

- A10 – Weltevrede (445 ha)
- A11 – Lusberg (445 ha)

The five EPLs encompass the Khorixas Constituency, and only a small part of EPL 7031 overlaps with the Kamanjab Constituency as well (see **Error! Reference source not found.**2). Five communal conservancy areas overlap with the EPLs:

- //Huab;
- Doro !nawas;
- Sorris Sorris;
- !Khoro !goreb; and
- Audi

Proposed exploration activities include geological mapping, rock chip and soil sampling within the targeted areas, and drilling (depending on the results of the aforementioned activities).

Prior to the commencement of the proposed exploration activities, environmental clearance is required from the Department of Environmental Affairs (DEA) of the Ministry of Environment, Forestry and Tourism (MEFT), on the basis of an approved Environmental Impact Assessment (EIA) process, in terms of the Environmental Management Act, No. 7 of 2007 and its associated regulations of 2012.

Namisun as an independent firm of environmental consultants based in Namibia, has been appointed by Exploration 18 (Pty) Ltd to undertake and manage the EIA process.

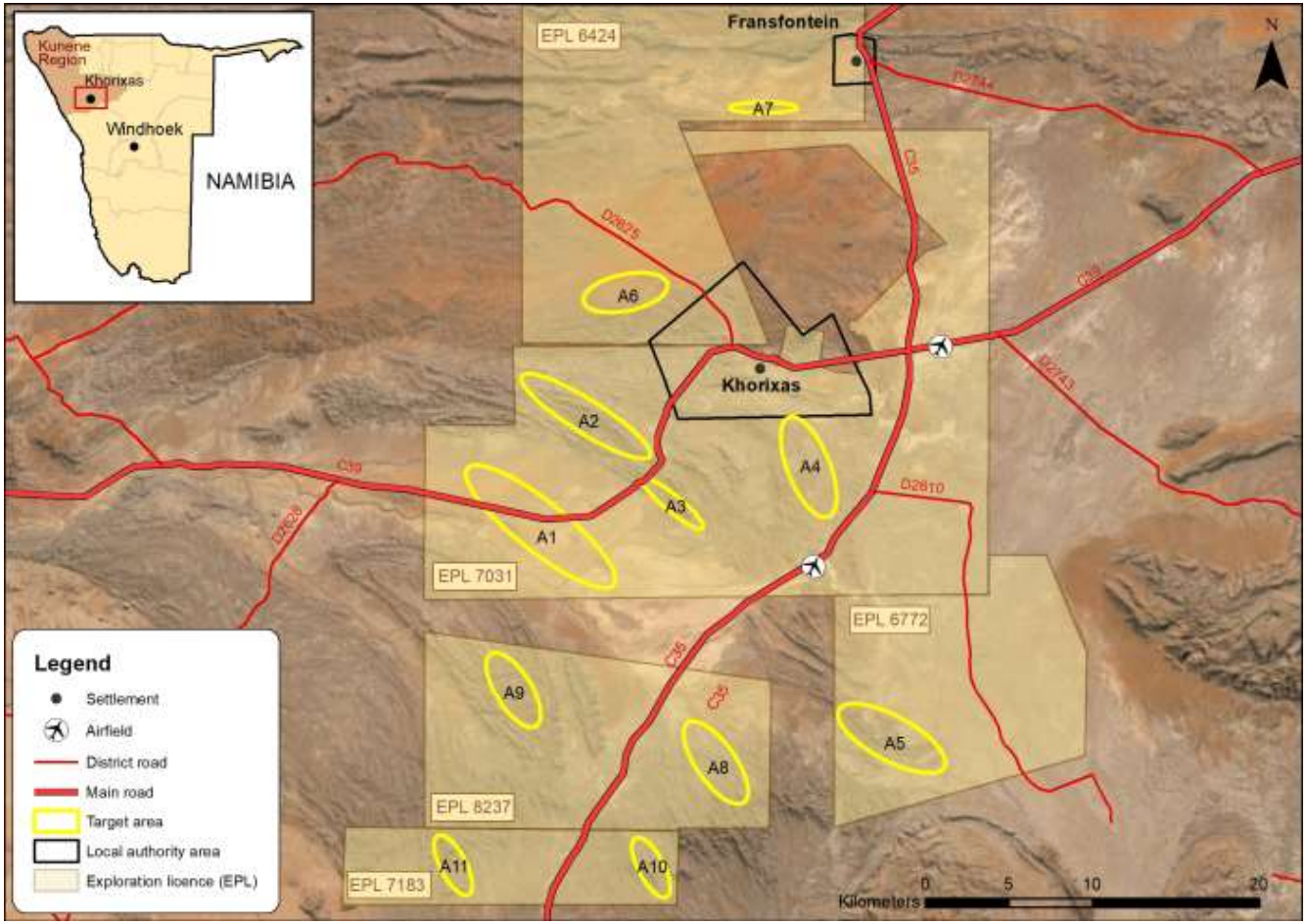


FIGURE 1: LOCALITY MAP OF EPL 6424, 6772, 7031, 7183 AND 8237

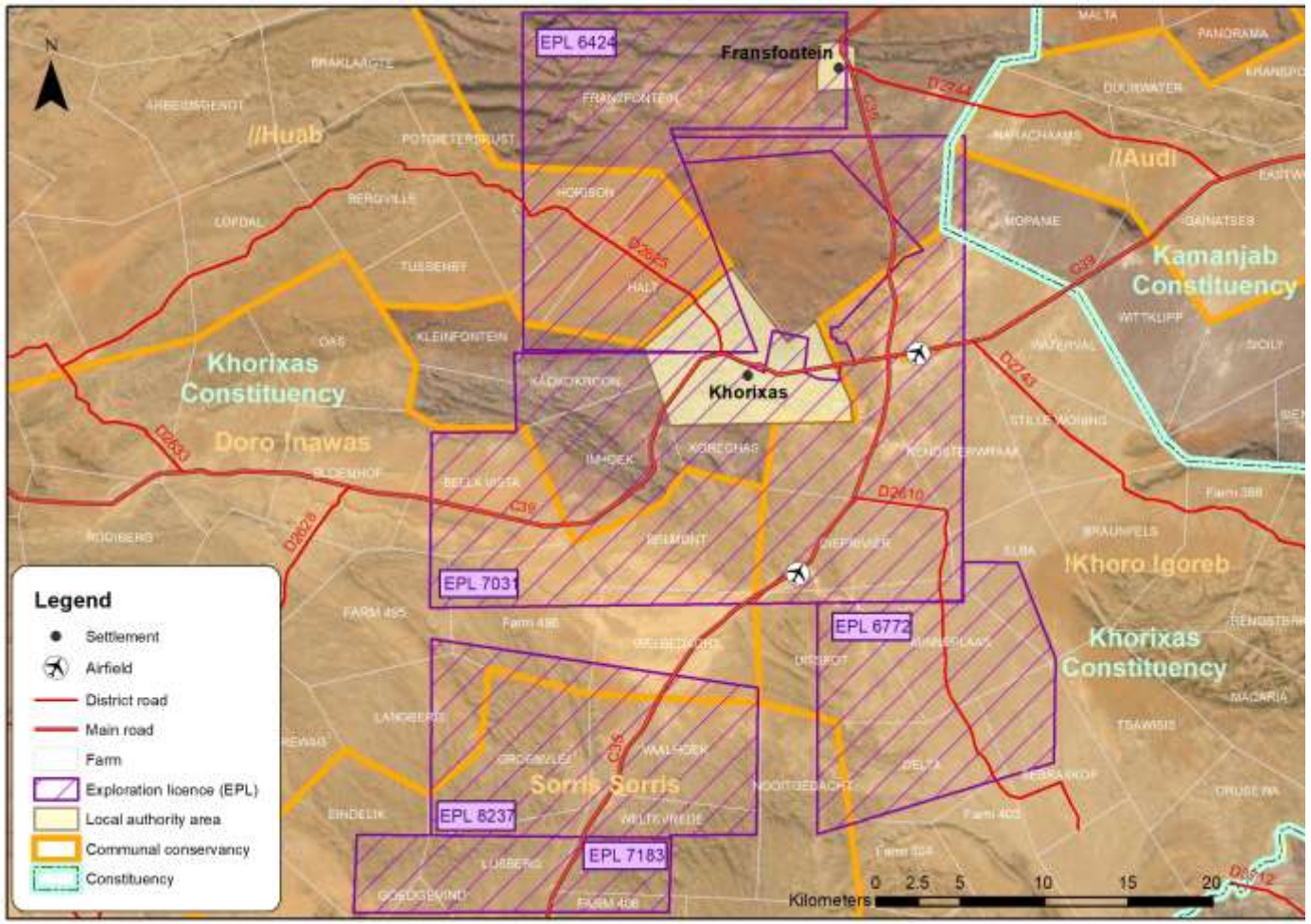


FIGURE 2: LOCATION OF EPL 6424, 6772, 7031, 7183 AND 8237 IN RELATION TO LANDOWNERSHIP AND NEIGHBOURS

1.2 MOTIVATION (NEED AND DESIRABILITY) FOR THE PROPOSED ACTIVITIES ON EPL 6424, 6772, 7031, 7183 AND 8237

The Directorate of Mines of the Ministry of Mines and Energy (MME), is tasked with the management of the mineral resources in Namibia, to ensure activities are undertaken to exploit the country's mineral resources in a manner which integrates mining into the various economic sectors for the socio-economic development of the country. In order to achieve this, MME issues EPLs to various entities for the exploration of minerals within the country. Exploration 18 (Pty) Ltd proposes to undertake exploration activities on EPL 6424, 6772, 7031, 7183 and 8237 for base and rare metals, industrial minerals and precious metals to confirm the feasibility of the resource. Should a feasible resource be located, it could provide social and economic development within the region and the country, subject to a Mining Licence (ML) being issued by MME and a separate, comprehensive (full) EIA process.

1.3 INTRODUCTION TO THE ENVIRONMENTAL IMPACT ASSESSMENT

EIAs are regulated by the MEFT in terms of the Environmental Management Act, No. 7 of 2007. This act was gazetted on 27 December 2007 (Government Gazette No. 3966) and its associated regulations were promulgated in January 2012 (Government Gazette No. 4878).

1.3.1 EIA FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 6424, 6772, 7031, 7183 AND 8237

Prior to the commencement of the proposed exploration activities, an environmental clearance is required for each one of the five EPLs (i.e., five separate applications) from the DEA of the MEFT, based on an approved EIA process.

This EIA process is conducted in terms of the Environmental Management Act, No. 7 of 2007 and its associated EIA regulations. This process includes a screening phase and a scoping phase, an impact assessment and a separate Environmental Management Plan (EMP) for each of the five EPLs.

This EIA process commenced with a focus on three EPLs, namely EPL 6424, 6772 and 7031. Since the initial meeting with stakeholders in Khorixas on 26 February 2021 two more proximate EPLs were added to the project. Permission for the inclusion of the two EPLs in the assessment process was granted by the DEA of MEFT. To make matters clear, clear communication with all parties was emphasised, including an additional meeting with stakeholders in Khorixas on 21 May 2021 (see Appendix C).

This report is the Scoping Report, with impact assessments included. The main purpose of this report is to provide information relating to the proposed activities and to indicate which environmental aspects and potential impacts have been identified during the screening and scoping phases. The report consists of information obtained from site observations, and the results of stakeholder consultations. The potential impacts of the proposed exploration activities could therefore be (qualitatively) assessed, and the assessment is also included in this report. The potential impacts were cumulatively assessed, taking the existing environment and other activities and facilities into consideration, where relevant.

It is thought that this Scoping Report (including an assessment of impacts), together with the five separate EMPs (for each of the five EPLs), will provide sufficient information for the MEFT to make an informed decision regarding the proposed project, and whether an Environmental Clearance Certificate (ECC) for each of the EPLs can be issued or not.

1.3.2 EIA PROCESS

The EIA Scoping process and corresponding activities are outlined in Table 1.

TABLE 1: EIA PROCESS

Objectives	Corresponding activities
Project initiation and internal screening phase (February - March 2021)	
• Identify environmental aspects and potential impacts internally • Notify the decision-making authority of the proposed project i.e., exploration activities and EIA process • Submit application • Initiate the EIA scoping process.	• Project initiation meetings. • Identify environmental and social issues. Determine further legal requirements. • Notify MEFT (DEA) of the proposed exploration and the EIA process through a Background Information Document (BID) via the online system. • Submit the ECC application form and BID to the competent authority (MME).
Scoping phase (including assessment of impacts) (March – June 2021)	
• Identify stakeholders and develop an Interested and / or Affected Party (I&AP) database and involve the I&APs in the scoping process through information sharing. • Further identify potential environmental issues associated with the proposed exploration activities. • Consider alternatives. • Provide a detailed description of the potentially affected environment. • Assessment (qualitative) of potential environmental impacts	• Notify government authorities and I&APs of the project and EIA process (telephone calls, e-mails, distribution of BID, newspaper advertisements and site notices). Refer to Section 2.3 and Appendix B for further details. • Conduct a site visit to familiarise with the proposed exploration activities and to inspect the existing environment where this will occur. • I&AP registration and comments. • Focus Group meetings. • Compilation of Scoping Report (including assessment of impacts) • Distribute consolidated Scoping Report and five EMPs to relevant authorities and I&APs for review. • Forward finalised Scoping Report with EMPs and I&APs comments to MME and MEFT for decision making.

Objectives	Corresponding activities
associated with the proposed exploration activities. • Develop management and mitigation measures.	

The EIA process is explained diagrammatically in Figure 3.

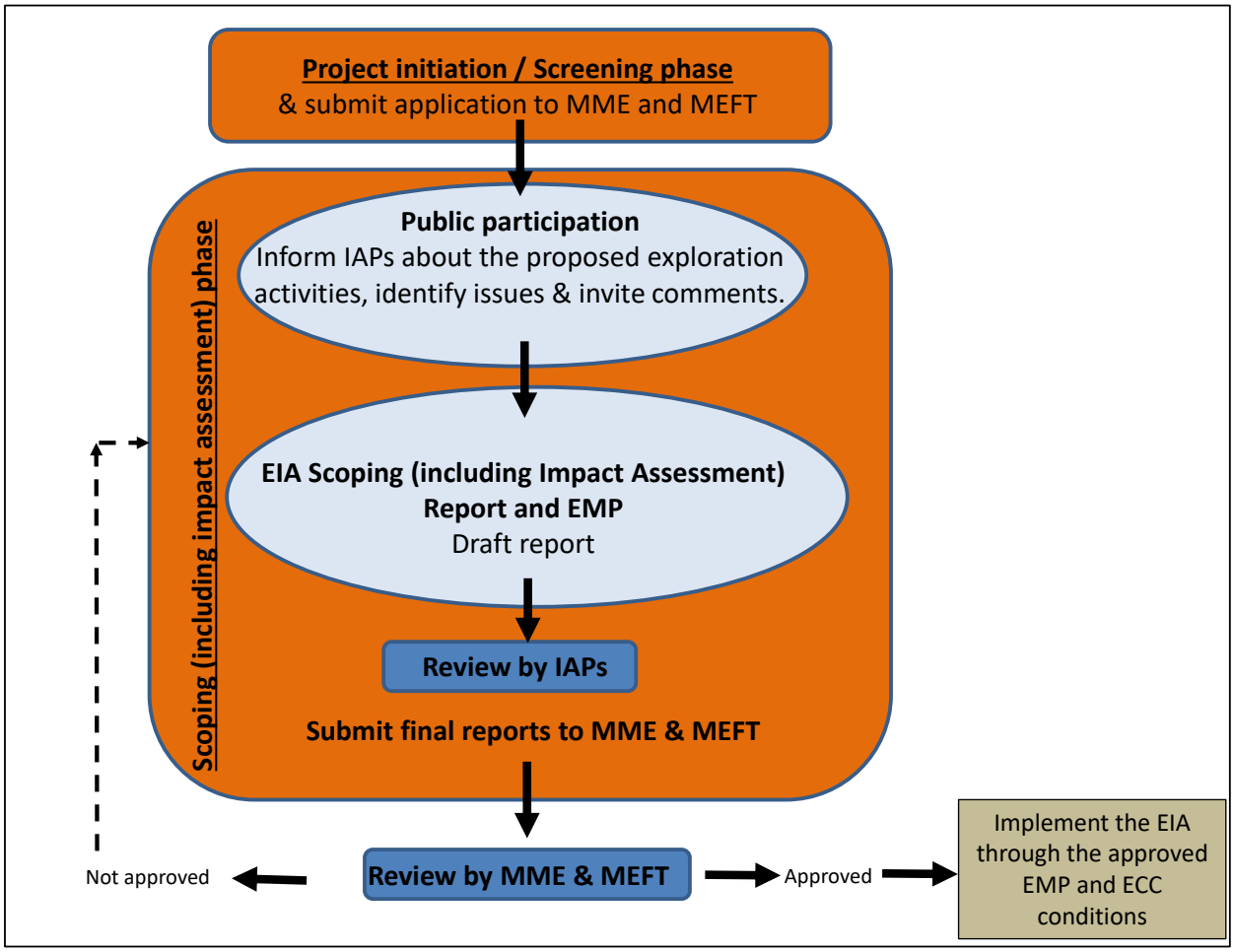


FIGURE 3 - THE EIA PROCESS

1.3.3 EIA TEAM

Namisun (a Namibia-based company) was appointed by Exploration 18 (Pty) Ltd to undertake and manage the EIA process and environmental clearance applications.

Werner Petrick, the EIA project manager, has over twenty years of relevant experience in conducting / managing EIAs, compiling EMPs and implementing EMPs and Environmental Management Systems. Werner is certified as lead environmental practitioner and reviewer under

the Environmental Assessment Professionals Association of Namibia (EAPAN). He holds a B.Eng. (Civil) Degree and a Master's Degree in Environmental Management.

Dr Pierré Smit, the project coordinator holds a PhD in Landscape Ecology and has over twenty years of experience in environmental management, managing environmental assessment and the implementation of EMPs and Environmental Management Systems in Namibia.

The relevant curriculum vitae documentation is attached in Appendix A.

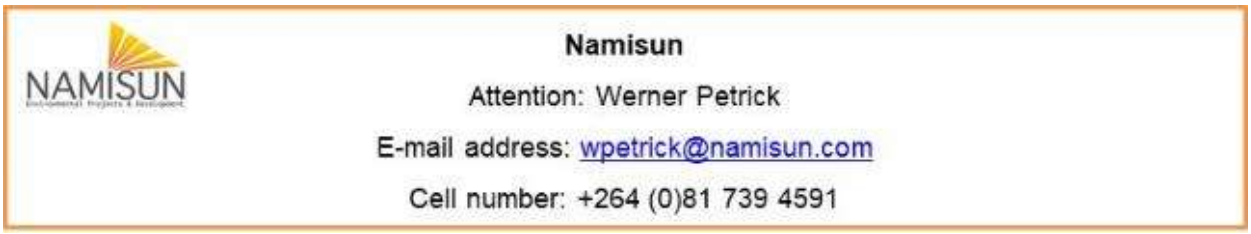
The environmental project team for the proposed implementation of the exploration activities is outlined in Table 2 below.

TABLE 2: THE ENVIRONMENTAL PROJECT TEAM

Team	Name	Designation	Tasks and roles	Company
Exploration 18 (Pty) Ltd Team	Carl Joone	Exploration manager	Responsible for the implementation of the EIA outcomes.	Exploration 18 (Pty) Ltd
EIA Project Management Team	Werner Petrick	Project manager	Management of the process, team members and process review.	Namisun
	Pierré Smit	Project coordinator	Project administration, reporting and interaction with stakeholders.	
Specialists	John Kinahan	Archaeologist	Archaeological study	J. Kinahan, Archaeologists

1.3.4 OPPORTUNITY TO COMMENT

I&APs were invited to comment on this EIA Scoping Report with the accompanying EMPs, which were available for a review and comment period from 17 May to 17 June 2021. Comments had to be sent to Namisun at the address, telephone number, or e-mail address shown below by not later than 17 June 2021.



2 SCOPING METHODOLOGY

2.1 INFORMATION COLLECTION

Namisun used various sources to identify the environmental aspects / potential impacts and to develop an understanding of the baseline environment, associated with the proposed exploration activities on EPL 6424, 6772, 7031, 7183 and 8237. The main sources of information for the preparation of the Scoping Report include:

- Relevant technical information from Exploration 18 (Pty) Ltd;
- Site visit by Namisun;
- Further consultation with the technical project team;
- Consultation with I&APs, stakeholders and relevant authorities;
- Heritage specialist study by J. Kinahan, Archaeologists
- Atlas of Namibia;
- The roadside geology of Namibia;
- Groundwater in Namibia – an explanation to the hydrogeological map; and
- Google Earth.

2.2 SCOPING REPORT

The main purpose of this Scoping Report is to indicate which environmental aspects relating to the proposed exploration activities might have an impact on the environment. Due to reasons mentioned in Section 1.3.1, these potential impacts could also be assessed and the findings presented in this report.

Table 3 outlines the Scoping Report requirements contained in Section 8 of the EIA Regulations of 2012 (under the Environmental Management Act, No. 7 of 2007). The table includes reference to the relevant sections in the report.

TABLE 3: SCOPING REPORT REQUIREMENTS STIPULATED IN THE EIA REGULATIONS

REQUIREMENTS FOR A SCOPING REPORT IN TERMS OF THE 2012 REGULATIONS	REFERENCE IN REPORT
(a) the curriculum vitae of the Environmental Assessment Practitioner (EAP) who prepared the report;	Appendix A
(b) a description of the proposed activity;	Chapter 4
(c) a description of the site on which the activity is to be undertaken and the location of the activity on the site	Chapters 4 and 5

REQUIREMENTS FOR A SCOPING REPORT IN TERMS OF THE 2012 REGULATIONS	REFERENCE IN REPORT
(d) a description of the environment that may be affected by the proposed activity and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed listed activity	Chapters 5 and 7
(e) an identification of laws and guidelines that have been considered in the preparation of the Scoping Report;	Chapter 3
(f) details of the public consultation process conducted in terms of regulation 7(1) in connection with the application, including - (i) the steps that were taken to notify potentially interested and affected parties of the proposed application; (ii) proof that notice boards, advertisements and notices notifying potentially interested and affected parties of the proposed application have been displayed, placed or given; (iii) a list of all persons, organisations and organs of state that were registered in terms of regulation 22 as interested and affected parties in relation to the application; and (iv) a summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues;	Sections 1.3.2 and 2.3 and Appendix B
(g) a description of the need and desirability of the proposed listed activity and any identified alternatives to the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives have on the environment and on the community that may be affected by the activity;	Sections 1.2 and Chapter 6
(h) a description and assessment of the significance of any significant effects, including cumulative effects, that may occur as a result of the undertaking of the activity or identified alternatives or as a result of any construction, erection or decommissioning associated with the undertaking of the proposed listed activity;	Chapter 7
(i) terms of reference for the detailed assessment; and	Chapter 7
(j) an environmental management plan, which includes - (i) information on any proposed management, mitigation, protection or remedial measures to be undertaken to address the effects on the environment that have been identified including objectives in respect of the rehabilitation of the environment and closure; (ii) as far as is reasonably practicable, measures to rehabilitate the environment affected by the undertaking of the activity or specified activity to its natural or	Separate EMPs for each of the EPLs (Appendix F).

REQUIREMENTS FOR A SCOPING REPORT IN TERMS OF THE 2012 REGULATIONS	REFERENCE IN REPORT
predetermined state or to a land use which conforms to the generally accepted principle of sustainable development; and (iii) a description of the manner in which the applicant intends to modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation, remedy the cause of pollution or degradation and migration of pollutants.	

2.3 PUBLIC PARTICIPATION PROCESS

The public participation process for the proposed exploration activities was aimed at ensuring that persons and or organisations that may be affected by, or interested in the proposed exploration activities were informed of the project and could register their views and concerns. By consulting with relevant I&APs, the range of environmental issues to be considered in the Scoping Report (including the assessment of impacts) has been given specific context and focus.

Included below is a summary of the people consulted, the process that was followed, and the issues that were identified.

2.3.1 INTERESTED AND AFFECTED PARTIES

The broad list of stakeholders (I&APs) that are relevant to the proposed exploration activities on EPL 6424, 6772, 7031, 7183 and 8237 is provided below:

- Khorixas Town Council Management as custodians over the Khorixas Townlands;
- Councillor of the Khorixas Constituency;
- Residents of Khorixas;
- Traditional Chiefs of communal land;
- Management staff of the conservancies;
- Non-governmental organizations (NGOs);
- Parastatals; and
- I&APs that registered on the project.

These stakeholders were informed about the need for the proposed exploration activities, the EIA process (including the public consultation), as well as the outcomes of the assessment.

The full stakeholder database for this project is included in Appendix D of this report.

2.3.2 STEPS IN THE PUBLIC CONSULTATION PROCESS

Table 4 sets out the steps that were followed as part of the consultation process:

TABLE 4: CONSULTATION PROCESS WITH I&APS AND AUTHORITIES

TASK	DESCRIPTION	DATE
Notification - regulatory authorities and I&APs		
Notification to MME and MEFT	Namisun notified MEFT of the proposed project through registering the project on their portal and uploading the BID. The ECC application form and BID were submitted to the competent authority (MME).	February 2021
I&AP identification	The stakeholder database was developed. This database was updated as and when required. A copy of the I&AP database is attached in Appendix D.	February – June 2021
Distribution of BID	Copies of the BID were distributed via email to relevant authorities and I&APs on the stakeholder database and hard copies were made available on request. The purpose of the BID was to inform I&APs and authorities about the proposed exploration activities, the assessment process being followed, possible environmental impacts and ways in which I&APs could provide input to Namisun. Attached to the BID was a registration and response form, which provided I&APs with an opportunity to submit their names, contact details and comments on the project. A copy of the e-mail notification and BID are attached in Appendix B.	February 2021
Site notices	Site notices were placed in Khorixas – at the offices of the Town Council, on the notice boards of some state departments and at a local shop to notify I&APs of the proposed project, the EIA process being following and the public meetings. Photos of the site notices that were displayed are attached in Appendix B.	February 2021
Newspaper Advertisements	Block advertisements were placed in the Market Watch as part of the following newspapers: • The Namibian Sun (15 and 22 February 2021) • Die Republikein (15 and 22 February 2021) • Allgemeine Zeitung (15 and 22 February 2021) Copies of the advertisements are attached in Appendix B.	February 2021
Initial Focus Group Meetings and submission of comments		
Initial focus group meetings to inform key stakeholders of the proposed project and to obtain comments	After several telephone discussions a focus group meeting was held with key stakeholders and affected parties in Khorixas on 26 February 2021. The following stakeholders were invited: • Traditional chiefs • Management committees of the conservancies • Members of the Town Council Management team • Personnel from the Khorixas Constituency office • Officials from the state • All other registered I&APs	26 February 2021

TASK	DESCRIPTION	DATE
Comments and Responses	A summary of questions / comments / issues raised (with responses) during the meetings and by email are provided in Section 2.3.3. Minutes of meetings and comments received are attached in Appendix C.	March 2021
Review of draft Scoping Report		
I&APs and authorities (excluding MEFT) review of Scoping Report with EMPs	Copies of the Scoping Report (including impact assessment) with the five EMPs were made available for review at the Khorixas Town Council office. Electronic copies of the report were available on request from Namisun. Summaries of the Scoping Report were distributed to all relevant authorities and I&APs on the I&AP database via e-mail (see Appendix B). A text message (SMS) was also sent to the stakeholders without email to inform them about the availability of the report and review period. Authorities and I&APs were able to review the Scoping Report and to submit comments in writing to Namisun. The comments period commenced on the 17th May and the closing date for comments was **17 June 2021.**	May 2021
Feedback Focus Group Meeting with key stakeholders	To consolidate further input and to provide verbal feedback on the outcomes of the assessment, a feedback focus group meeting with key stakeholders was held in Khorixas on 21 May 2021. The invited stakeholders include the parties present at the initial focus group meeting, as well as additional I&APs identified since then. All invited stakeholders were also supplied with the drafted documents and were encouraged to review them.	May 2021 (during the review period of the report)
MME and MEFT review of Scoping Report and EMPs	A copy of the final Scoping Report, incorporating I&APs comments, was compiled for submission to MME (and then MEFT) on completion of the public review process. The relevant documents were uploaded onto the MEFT online portal as well.	June 2020

2.3.3 SUMMARY OF ISSUES RAISED

All questions / comments / issues that have been raised throughout the process by authorities and I&APs are summarised in Table 5 below, with relevant responses.

TABLE 5: SUMMARY OF QUESTIONS / COMMENTS / ISSUES RAISED WITH RESPONSE

COMMENT / QUESTIONS / ISSUE RAISED	NAME	DATE	METHOD	RESPONSE
Why did you choose the targeted areas?	John Hinda	26 February 2021	Initial focus group meeting with stakeholders	The areas were identified by using geophysics maps and magnetic fields in relation to the occurrence of gold deposits elsewhere in Namibia.
Are the farm names for the targeted areas available?				Yes, the targeted areas and farm names are indicated on the maps used in the report (see Figure 2) and presented during the meeting with stakeholders.
Can the targeted areas be named after the farm names?				Yes, the farm names are referenced in the use of the targeted areas (see Section 1.1).
Where will Exploration 18 (Pty) Ltd find staff to hire and how will their remuneration be determined?				During the first phase the work team will be very small, less than ten people. Staff will be recruited as far as possible from local communities, e.g., Khorixas. Hiring and remuneration will be done in compliance with the Labour Act.
What is the recruitment strategy of Exploration 18 (Pty) Ltd?	Harry Haradoeb	21 May 2021	Second focus group meeting with stakeholders	
Will all conservancies and traditional authorities be taken into consideration during the recruitment process?	Samson Awaseb			The conservancies and traditional authorities as well as the Khorixas Town Council are well informed about the proposed exploration activities, and this provides a platform for engaging the traditional authorities and conservancies during the recruitment process. A list with names of jobseekers is a good idea and the offices of the Khorixas Town Council could be requested for such a list. One work team will be recruited and, as far as possible, the same staff will conduct all the exploration activities in all the target areas. It is important to keep in mind that some skills and qualifications are required for appointments.
As the proposed target areas overlap with conservancies and the traditional authorities, and are all located in proximity of Khorixas, would it be possible to provide a list with names of jobseekers?	Jeffrey Hanadaob			

COMMENT / QUESTIONS / ISSUE RAISED	NAME	DATE	METHOD	RESPONSE
Is there a cut-off date for the program of the exploration activities and if so, when?	Charlton Richter	21 May 2021	Second focus group meeting with stakeholders	No cut-off date in terms of a timeline exists, instead the exploration activities are determined by the budget available.
How will people that do not have access to the internet be able to review the documents and comment? Can information about the EIA be shared with stakeholders?	Judie Melekie	26 February 2021	Initial focus group meeting with stakeholders	Communication is done with all identified stakeholders – the audience present at the meetings as well as the identified stakeholders who could not attend meetings; communication is done on cell phone, email, or SMS. The traditional authorities and conservancies are seen as representatives and therefore communication is being done with the identified contact persons. Copies of the Scoping Report (including impact assessment) with the EMPs are made available for review at the Khorixas Town Council office.
It is important to ensure effective communication with all stakeholders at all levels.	Gerson Namiseb	21 May 2021	Second focus group meeting with stakeholders	Agreed. It is for this reason that a database for all stakeholders exist, and that communication is done via emails, SMS and cell phone to all registered parties. It is also important that representatives from the conservancies and traditional authorities communicate all information to the people they represent.
Were officials from the MEFT invited as stakeholders to attend the meetings?	Harry Haradoeb	21 May 2021	Second focus group meeting with stakeholders	Yes, officials were invited to both meetings. For the second meeting an invitation was sent to the office of the deputy director in Outjo. The invitation was confirmed with a telephone call, an email and a follow-up SMS as well.
Take note of the location of a planned hydroponic garden near the D2625 road on the farm Halt at Post 2.	Judie Melekie	26 February 2021	Initial focus group meeting with stakeholders	Although the area is located nearby the targeted area A6 (Halt), it is unlikely to be affected by the exploration activities. In addition, provision is made for necessary mitigation and management measures in the EMP.

COMMENT / QUESTIONS / ISSUE RAISED	NAME	DATE	METHOD	RESPONSE
What are the options to obtain water from the conservancies?		21 May 2021	Second focus group meeting with stakeholders	It is planned that the water during the first phase will be obtained in Khorixas. Quantities are small, mostly for daily drinking water only. It is not expected that larger quantities are needed on the short term.
How will sensitive areas within the conservancies be protected during the exploration activities?	Samson Awaseb	21 May 2021	Second focus group meeting with stakeholders	Exploration activities will be restricted to the target areas and will only take place if the necessary access agreements are in place. The EMPs stipulate management and mitigation requirements to ensure that sensitive areas are protected.
How will conservancies benefit from mining?	Jeffrey Hanadaob			Mining follows long after exploration. Therefore, it is important not to create expectations at such an early stage. However, from the examples elsewhere in Namibia there is ample evidence how mining benefits conservancies, for example the Gaingu Conservancy at Spitzkoppe that benefit from the uranium mines in its vicinity.
What would happen when a small miner finds a resource within the area of the EPL?	Rheinholdt Horaseb	26 February 2021	Initial focus group meeting with stakeholders	Exploration 18 (Pty) Ltd is interested in gold and agreement has been made with EPL holders accordingly. Exploration activities will focus on gold only, and not interfere with existing and ongoing activities or interests. The EPL's of interest have claim on all base and rare metals, industrial minerals and precious metals.
What are the regulations in terms of protected species?	Charlton Richter	26 February 2021	Initial focus group meeting with stakeholders	A permit is required for the removal of protected vegetation species as is required by the Forestry Act. It is not foreseen that any protected species will be harmed or killed during the first phase of the project as all activities are non-invasive. Provision is made for mitigation and management measures during the second phase when field work commences. In case

COMMENT / QUESTIONS / ISSUE RAISED	NAME	DATE	METHOD	RESPONSE
				unknown species are discovered, the services of a specialist (botanist) will be called in. See Section 4.8. See also Table 1 of the EMPs, which provide further details regarding management and mitigation measure of protected species, etc.
Cornelius Bowe – Do graves of German soldiers count as heritage resources and if these graves are outside of the EPL – will they be recorded somehow?	Cornelius Bowe	26 February 2021	Initial focus group meeting with stakeholders	A heritage specialist was appointed to conduct a survey specifically for the EPLs (see Appendix E). The information about the graves, despite being located outside the EPL, was shared with the specialist. The necessary steps will be taken to record and to protect graves that might be discovered incidentally. Likewise, any heritage resource found incidentally within the target areas will be recorded and the Chance Finds Procedure will be followed (see Table 1 in the EMP).
What happens if a fossil is found?	Unknown	26 February 2021	Initial focus group meeting with stakeholders	The geological context of the EPLs pointed out that the possibility to find a fossil is very low. This was also confirmed by the heritage specialist report (see Appendix E). If found, the Chance Finds Procedure will be followed.
Another exploration company was doing prospecting near Khorixas but apparently terminate the activities due to the shortage of groundwater. Will that not happen again?	Harry Haradoeb	21 May 2021	Second focus group meeting with stakeholders	Exploration activities will primarily focus on the availability of a minable resource. Based on the economic feasibility of the resource, the needs for water, power, and other infrastructure will be determined by means of specialized studies afterwards.

3 ENVIRONMENTAL LAWS AND POLICIES

The Republic of Namibia has five tiers of law and a number of policies relevant to environmental assessment and protection, which include the Constitution of the Republic of Namibia, statutory law, common law, customary law and international law.

Relevant policies and plans currently in force include:

- Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation (1994).
- Policy for the Conservation of Biotic Diversity and Habitat Protection, 1994.
- Policy for the Conservation of Biotic Diversity and Habitat Protection (1994).
- The EIA Policy (1995).
- The National Climate Change Policy of Namibia (September 2010).
- White Paper on the Energy Policy, 1998.
- Policy for Prospecting and Mining in Protected Areas and National Monuments (1999).
- Minerals Policy of Namibia (2004).
- National Development Plan, 2017/2018 – 2021/2022, guided by Vision 2030.
- National Policy on Prospecting and Mining in protected areas (2018).
- Namibia Vision 2030.

As the main source of legislation, the Constitution of the Republic of Namibia (1990) makes provision for the creation and enforcement of applicable legislation. In this context and in accordance with its constitution, Namibia has passed numerous laws intended to protect the natural environment and mitigate against adverse environmental impacts.

The management and regulation of mining activities falls within the jurisdiction of the MME, with environmental regulations guided and implemented by the DEA within MEFT.

Section 3.1 summarises the various applicable laws and policies, international treaties and protocols.

3.1 Summary of Applicable Acts and Policies

In the context of the exploration activities, there are several laws and policies currently applicable. They are reflected in Table 6.

TABLE 6: RELEVANT LEGISLATION AND POLICIES ASSOCIATED WITH EXPLORATION ACTIVITIES

YEAR	NAME	Natural Resource Use (energy and water)	Emissions to air (fumes and dust)	Emissions to land (non-hazardous and hazardous	Emissions to water (industrial and domestic)	Noise (remote only)	Visual	Vibrations	Impact on Land use	Impact on biodiversity	Impact on Archeology	Emergency situations	Socio-economic	Safety and Health	Other
1956	Water Act, No. 54 of 1956	X			X								X		
1969	Soil Conservation Act, No. 76 of 1969 and the Soil Conservation Amendment Act, No.38 of 1971			X					X	X					
1974	Hazardous Substance Ordinance, No. 14 of 1974														X
1975	Nature Conservation Ordinance, No. 14 of 1975	X			X					X	X				
1976	Atmospheric Pollution Prevention Ordinance, No. 11 of 1976		X												
1990	The Constitution of the Republic of Namibia of 1990	X	X	X	X	X	X	X	X	X	X	X	X	X	
1990	Petroleum Products and Energy Act, No. 13 of 1990		X	X	X					X				X	X
1992	The Minerals (Prospecting and Mining) Act, No. 33 of 1992	X	X	X	X					X					
1995	Namibia's Environmental Assessment Policy for Sustainable Development and Environmental Conservation	X	X	X	X	X	X	X	X	X	X	X		X	
1997	Namibian Water Corporation Act, No. 12 of 1997	X											X		

YEAR	NAME	Natural Resource Use (energy and water)	Emissions to air (fumes and dust)	Emissions to land (non-hazardous and hazardous	Emissions to water (industrial and domestic)	Noise (remote only)	Visual	Vibrations	Impact on Land use	Impact on biodiversity	Impact on Archeology	Emergency situations	Socio-economic	Safety and Health	Other
2001	The Forestry Act, No. 12 of 2001 as amended by the Forest Amendment Act, No.13 of 2005	X							X	X					
2004	National Heritage Act, No. 27 of 2004										X			X	
2004	Pollution Control and Waste Management Bill (3rd Draft September 2003)		X	X	X	X									
2007	Environmental Management Act, No. 7 of 2007	X	X	X	X	X	X	X	X	X	X		X	X	
2012	Regulations promulgated in terms of the Environmental Management Act, No. 7 of 2007 (No. 30 of 2012)	X	X	X	X	X	X	X	X	X	X	X	X	X	X
2013	Water Resources Management Act, No. 11 of 2013	X			X								X		

4 DESCRIPTION OF THE PROPOSED EXPLORATION ACTIVITIES

Exploration 18 (Pty) Ltd proposes to undertake exploration activities on EPL 6424, 6772, 7031, 7183 and 8237 for base and rare metals, industrial minerals and precious metals. Combined, the project covers a total surface area of approximately 127,000 ha. Exploration activities will be limited to eleven target areas with a combined surface area of approximately 10,500 ha. The sizes of the individual EPLs and the sizes and names of the eleven target areas are specified in Section 1.1.

The exploration activities shall commence as soon possible in 2021, depending the decision by MEFT and the issuing of ECCs. For each of the EPLs a documented and signed agreement between Exploration 18 (Pty) Ltd and the respective EPL-holders for the permission to conduct exploration activities on the EPLs exists. In addition, access agreements – as required by Section 52 of the Minerals (Prospecting and Mining) Act, No. 33 of 1992 – will be entered into between Exploration 18 (Pty) Ltd and the relevant landowners, specifically to ensure access to the eleven target areas.

Negotiations regarding access agreements fall outside of the ambit of the EIA process.

A sequential drilling program is planned – exploration in one EPL will be completed first before the focus shifts to another EPL. The proposed exploration activities will include:

- Phase 1:
    - Geological studies and mapping: Review of geological maps of the area and onsite ground traverses and observations. Small samples of rock chips may be collected for further analysis.
    - Soil Sampling: Small pits (±30 cm x 30 cm) will be dug and sample material will be collected in the target areas.
- Phase 2:
  Depending on the Phase 1 results, the drilling of boreholes might be undertaken in target area(s).
    - Reverse Circulation (RC) drilling: Holes are drilled, and drill samples collected for analysis. Small areas of land within the target areas (±15m x 15m) per hole will be used for drill rig establishment and environmental containment. These areas will be rehabilitated once drilling has been completed.
    - Depending on the results, exploration activities may progress to ground geophysics and diamond drilling.

The extent of the proposed exploration activities is expected within the targeted footprint areas, depending on the access agreements. Specific targeted areas for the proposed exploration activities have been confirmed and are indicated in Figure 1.

It is not foreseen that any protected plant species will be harmed or killed during the first phase of the project, as all activities are non-invasive. In case unknown species are discovered, the services of a specialist (botanist) will be called in.

In case the exploration activities require the removal of a protected vegetation species, the necessary permit needs to be obtained from the authorities as is required by the Forestry Act, No. 12 of 2001 as amended by the Forest Amendment Act, No.13 of 2005, and the accompanying regulations.

4.1 EXPLORATION ACTIVITIES

4.1.1 GEOLOGICAL STUDIES AND MAPPING

This includes the further review of geological maps of the area and onsite ground traverses and observations. Small samples of rock may be collected for further analysis. During this phase, Exploration 18 (Pty) Ltd does not propose to conduct any “intrusive activities” – i.e., all likely targeted areas on the EPLs could be reached without creating new access roads or any cut lines and having to remove trees / vegetation.

4.1.2 SOIL SAMPLING

With guidance from the geological mapping, samples of soil are collected and sent for geochemical major and trace element analysis to determine if sufficient quantities of base metals are present. These analyses are conducted by analytical chemistry laboratories.

Small pits (±30 cm x 30 cm) will be dug and sample material collected in the target areas.

4.1.3 DRILLING

Depending on the Phase 1 results, drilling of boreholes might be undertaken in target area(s) in anyone of the five EPLs.

Exploration drilling is the process of removing rock samples from an area, where mineralisation is suspected. Holes will be drilled and drill samples collected for analysis of trace elements. There are various drilling methods available and Exploration 18 (Pty) Ltd will utilise RC drilling initially. Depending on the results, diamond drilling will be considered in addition.

A typical drilling pad consists of a drill-rig, an area where the drill core and geological samples can be stored and a storage area for drill equipment, fuel and lubricants. The drilling pad, usually 15 m x 15 m in size, is cleared and levelled, barricaded, and off-limits to those not part of the exploration team.

RC Drilling / Open percussion drilling:

The drilling mechanism is a pneumatic reciprocating piston known as a "hammer" driving a tungsten-steel drill bit. RC drilling utilises much larger rigs and machinery and depths of up to 500 m are routinely achieved. RC drilling ideally produces dry rock chips, as large air compressors dry the rock out ahead of the advancing drill bit. RC drilling is slower and costlier but achieves better penetration; it is also less costly than diamond coring.

Open percussion drilling differs in that air is blown directly down the drill-hole in order to return rock samples to the surface.

Diamond-core drilling:

Diamond core drilling uses an annular diamond-impregnated drill bit attached to the end of hollow drill rods to cut a cylindrical core of solid rock. Holes within the bit allow water to be delivered to the cutting face. This provides three essential functions — lubrication, cooling, and removal of drill cuttings from the hole. Diamond drilling is much slower than RC drilling due to the hardness of the ground being drilled. Drilling of 100 to 1800 metres is common and at these depths, ground is mainly hard rock.

Diamond rigs can also be part of a multi-combination rig. Multi-combination rigs are a dual setup rig capable of operating in either a RC and diamond drilling role (though not at the same time). This is a common scenario where exploration drilling is being performed in a very isolated location. The rig is first set up to drill as an RC rig and once the desired metres are drilled, the rig is set up for diamond drilling. This way the deeper metres of the hole can be drilled without moving the rig and waiting for a diamond rig to set up on the pad.

Samples taken during drilling and soil surveys will be sent away for analysis, specifically to determine the mineral composition and the level of base metals. Samples are taken during drilling by the geologist and can be in either rock, soil or drill core form.

4.2 Exploration Machinery / Vehicles and support

4.2.1 Machinery / Vehicles

As a sequential drilling program is planned, the same fleet of machinery and vehicles will be retained to conduct the exploration activities in all target areas. The following machinery / vehicles will be utilized in the drilling program per target area:

- 3 x pick-up trucks (bakkies).
- 1 x truck-mounted RC rig.
- 1 x truck-mounted compressor.

4.2.2 Employment and accommodation

It is anticipated that the size of the personnel team will remain the same throughout the project. The following personnel will be employed to carry out the proposed exploration activities:

- 2 x geologists
- 8 x field assistants
- 6 x drilling operators (if drilling is justified by the sampling results)

Personnel will be recruited locally, as far as possible. The exploration team will reside in existing houses, preferably in Khorixas. Staff will travel to site and back on a daily basis. Nobody will stay onsite.

4.3 Power Supply

The various machinery and equipment required for drilling have their own power supplies and or fixed generators.

4.4 Water supply

Drinking water will be transported from Khorixas and or Fransfontein to the field daily. If the project progresses to diamond drilling (depending on the results from RC drilling), a water tanker will transport water from Khorixas and or Fransfontein. In such a case the necessary arrangements will be made.

4.5 Fuel Supply and Storage

Diesel is the main consumable and will be required for the generators as well as the vehicles used during the exploration activities. All vehicles will make use of the existing fuel station(s) in Khorixas and no fuel will be stored onsite.

4.6 Access Routes

Existing access routes and roads will be used during the exploration activities, as far as possible.

The main access to the target areas will be via the C35, C39, D2625 and the D2610 roads. In liaison with landowners, local tracks will be used to access more specific target areas. Prior to any exploration activities access agreements, as required by Section 52 of the Minerals Act, will be entered into between Exploration 18 (Pty) Ltd and the relevant landowners.

No new roads will be constructed.

4.7 Chemicals and other hazardous substances (i.e. fuel supply)

The table below describes the possible hazardous substances that will be handled during the exploration activities.

TABLE 7: HAZARDOUS SUBSTANCES THAT WILL BE UTILISED ONSITE

Substance	Purpose	Storage
Diesel fuel	Fuel for vehicles and generators.	Existing fuel station(s) in Khorixas. No storage onsite
Petrol fuel	Fuel for vehicles.	No storage onsite
Oil, grease and lubricants	Vehicles and equipment.	No storage onsite

4.8 Waste management

The following types of waste will be generated during the exploration activities, in relatively small volumes:

- Domestic waste (non-hazardous).
- Industrial waste (i.e., hydrocarbon contaminated material / soil) (hazardous)

Domestic waste will be contained in a manner that there can be no discharge of contamination to the environment and will be removed from site daily, for disposal at the designated landfill site at Khorixas. Recyclable items are to be sorted and stored in temporary containers and removed to relevant recycling centres (where possible).

Potential hydrocarbon spills from vehicles and drilling equipment, as well as refuelling activities might lead to soil contamination and needs to be treated as a hazardous waste if not bio-remediated. Drip trays will be placed under all stationery vehicles and machinery, including the drilling equipment. Any oil spill will be scooped into bags and taken to a permitted disposal site.

4.9 SANITATION

Once a drilling site is established, a portable toilet and ablution facilities will be placed onsite to ensure that sewage is contained and disposed of appropriately.

4.10 FIRE MANAGEMENT

Drill pads will be cleared of grass, dry wood and anything that might increase the risk of starting an unintentional fire. To avoid starting a fire, smoking will only be allowed in dedicated smoking areas with a sand filled drum or similar container for disposal of cigarette butts. No open fires for cooking will be permitted to discourage wood collection and possible fires. Gas stoves must be used when required. Furthermore, fire extinguishers will be available onsite at all times.

4.11 REHABILITATION

Once the proposed exploration has been concluded on a specific site, the impacted site will be rehabilitated. This will ensure a program of progressive rehabilitation, also in accordance with the requirements of the EMP.

5 DESCRIPTION OF THE CURRENT ENVIRONMENT

All five EPLs are located in close proximity of Khorixas. EPL 6424 is located to the northwest of Khorixas and overlaps partly with the townlands as well as the western part of the Fransfontein Townlands. EPL 7031 is located to the south of Khorixas and overlaps with the southern parts of the Khorixas Townlands. EPL 6772 is located 20 km southeast of Khorixas and adjacent to EPL 7031. EPL 8237 is located west of EPL 6772 and south of EPL 7031, approximately 15 km southwest of Khorixas on both sides of the C35 road towards Uis. EPL 7183 is located 40 km southwest of Khorixas and directly south of EPL 8237, also on both sides of the C35 road (see Figure 1).

All five EPLs are located on communal land, constituting a total surface area of approximately 127,000 ha, but exploration activities will be limited to the eleven target areas which cover a combined surface area of approximately 10,500 ha. The C39 road runs from east to west through EPL 7031 while the C35 road runs from south to north through EPL 7031, EPL 8237 and EPL 7183. The C35 road intersects EPL 6424 only for a short distance near Fransfontein. Branching off from the C35 road, the D2610 road runs in a north-south direction through EPL 6772. The D2625 road branches off from the C39 road and runs from southeast to northwest through the southern half of EPL 6424 (Figure 1).

This section has been compiled from recent site visits undertaken by the EIA project team as well as the heritage specialist report, discussions with stakeholders, literature on geology, the Atlas of Namibia and Google Earth.

5.1 CLIMATE

All target areas within the five EPLs are located in a part of Namibia which receives between 200 and 250 mm of rain per year, with a variation coefficient of 40 - 50%. Rainfall events are limited to the summer months, mainly between December and March, in the form of thunderstorms often associated with heavy downpours. Potential evaporation can exceed 2,100 mm per year, meaning an average water deficit of between 1,900 and 2,100 mm per year. Relative humidity is low, rarely more than 20% in winter but may reach 85% in summer before or after thunderstorm build-up. Maximum temperatures average around 32 - 34°C, mainly recorded during the afternoons between November and January, while minimum temperatures are around 6 - 8°C and are normally recorded during nights in June and July. Deviations from these averages are common, with the highest temperatures reaching 38 - 40°C and the lowest temperatures below 6°C. Frost does not occur (Mendelsohn et al., 2002).

Due to the rhythm of prevalent air pressure systems, the wind patterns over Namibia's interior remain fairly predictable. Predominant wind over this part of Namibia is expected to be from the east and northeast, with occasional airflow from the southeast and southwest. Wind speed is expected to be low with more than two-thirds of the time lower than 2 m/s. The stronger air movements during the afternoons and evenings are the result of the ground being heated more in some places than others. During the winter months wind speed is slightly higher (Mendelsohn, et al., 2002).

5.2 GEOLOGY

Namibia can be divided into two broad geological provinces, one covering the western parts and the other in the east. The western parts consist of a variety of geological formations of different ages and composition and formed under very diverse environmental conditions – some were formed in the depths of primeval oceans, others as a result of the movement of the earth's crust or because of collisions or volcanic eruptions. Most of these formations are exposed in the west as rugged landscapes of mountains, hills, valleys and plains with sparse vegetation. In eastern Namibia, the formations are covered with sediments of a much more recent past (Mendelsohn et al., 2002). These sediments appear monotonous and uniform, covered with dense vegetation in the north and decreasing to the south. Knowledge about the sediments over eastern Namibia has been derived from water abstraction boreholes, rare outcrops and underlying formations exposed along drainage features.

The EPLs are located within a zone where formations of the Damara Supergroup (850 – 600 million years old) are located adjacent to formations of the Paleoproterozoic Huab Complex (2,600 - 1,600 million years old). The latter contains some of the oldest formations in Namibia. The line of contact almost coincides with the southern border of EPL 6424 (Figure 4). The Damara Supergroup is dominated by schists, sub-greywacke and quartzites of the Kuiseb Formation in the Swakop Group, and covers the southern EPLs, where nine of the eleven targeted areas (A1 – Bellavista; A2 – Inhoek; A3 – Belmont and A4 – Dieprivier in EPL 7031, A5 – Delta in EPL 6772, A8 – Vaalhoek and A9 – Groenvlei in EPL 8237, and A10 – Weltevrede and A 11 – Lusberg in EPL 7183) are located.

Towards the north and northwest the geology becomes increasingly complex and diverse, edged by the limestone lineament of the Otavi Group near Fransfontein in EPL 6424. Surficial deposits cover parts of EPL 7031 in the southwest, the east of EPL 6772 and EPL 7031 and parts of EPL 6424. Two of the targeted areas (A6 – Halt and A7 – Franzfontein in EPL 6424) are located where surficial deposits dominate (Figure 4).

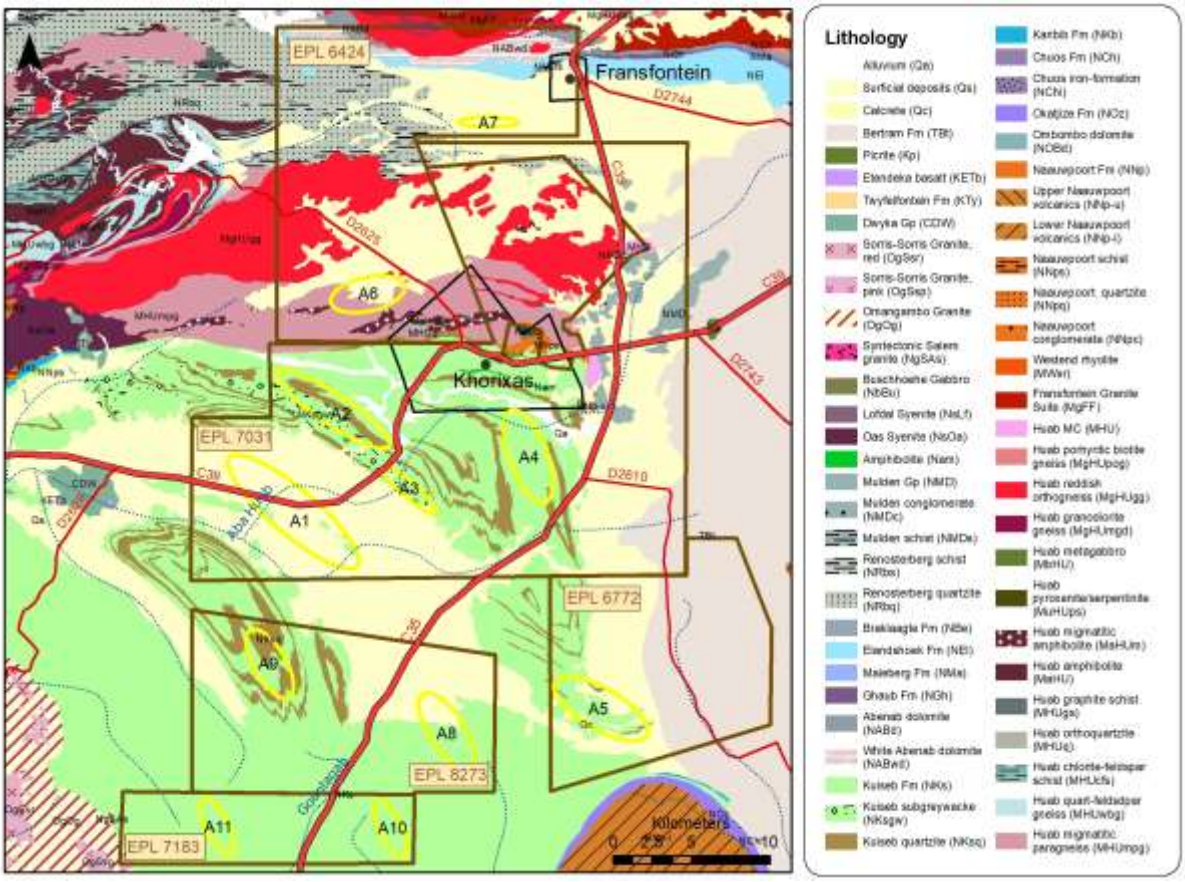


FIGURE 4 – GEOLOGY OF EPL 6424, 6772, 7031, 7183 AND 8237

To the east, and outside the boundaries of EPL 7031 and EPL 6772, the entire landscape shows a transition to the Bertram Formation (Cenozoic). Prominent terraces and eroded plains, consisting of conglomerates and cemented by calcrete are apparent. These recent formations are associated with the Ugab River. Small locations of the Mulden Group and the Naauwpoort volcanic intrusions interrupt the otherwise uniformity. To the west of Khorixas, outside EPL 7031, rocks of the Karoo Sequence form table-top mountains, structured as flat-lying shale and sandstone. Southwest of EPL 7183, Omamgambo granites form characteristic landscape features.

It is worthwhile to mention that palaeontological sites are associated with the late-Karoo formations, which are located outside all of the EPLs. Archaeological sites are representative of the Pleistocene and Holocene, which are also associated with formations outside the EPLs. Painted sites are associated with younger granites (absent in the EPLs) while engraving sites are associated with the outcropping Etjo and Twyfelfontein sandstones further to the west from EPL 7031, EPL 8237 and EPL 7183. See also Section 5.8.

5.3 TOPOGRAPHY AND SOILS

All five EPLs lay above the escarpment. Landscape elevation increases generally from west to east, and varying between 500 and 1,000 m above mean sea level. The topography over some parts of the EPLs is undulating though, and may differ sharply over short distances. Higher elevations are associated with the Fransfontein Mountains to the north, while the areas around Khorixas are hilly and marked by low ridges and schist hills. To the east of the EPL 7031 and EPL 6772 the landscape is increasing flatter, but higher above sea level than in the west. To the southwest of EPL 7183, the landscape gradually dips towards the paleo-valley of the Ugab River.

As most of the surface of the EPLs is undulating, and rocky outcrops are common, topsoil is thin, scarce or even absent in general. Lithic leptosols are the most prominent soil type, mainly to be found in depressions, valleys and flatter parts of the landscape. It is also the soil type that dominates on the plains covered with surficial deposits. These soils are coarse-textured, often contain gravel or unweathered pieces of rock from the surroundings and are characterized by their limited depth caused by the presence of continuous sub-surface hard rock, and often highly calcareous, especially on the plains covered with surficial deposits. Leptosols are poorly developed and thin, lack appreciable quantities of accumulated clay and organic material and are susceptible to erosion during the rainy season, especially in the beginning of the rainy season when vegetation cover is sparse. As the topsoil is loose and thin, it is also susceptible to wind erosion, especially when the vegetation cover is sparse.

5.4 HYDROGEOLOGY AND SURFACE WATER

Surface water in Namibia is a rarity due to the little rain that falls, and when it falls it either evaporates, seeps into the ground or is rapidly drained by ephemeral rivers.

All five EPLs fall within the Kunene South groundwater basin, which is covered by the drainage basins of the Ugab and Aba Huab Rivers. The watershed between the two basins is close to the southern boundary of EPL 7031. North of this line the Aba Huab flows west and becomes part of the Huab River further on, while tributaries such as the Goantagab southwest of this line are oriented towards the Ugab River. Large parts of EPL 6424, EPL 7031 and EPL 6772 do not show clear drainage lines though. In general, the direction of surface water flow is west to southwest (towards the Huab River) over the largest part, and south to southeast over the southern parts (towards the Ugab River).

Both the Ugab and Huab are ephemeral rivers with huge paleo-valleys, which indicate that they were much bigger in the past. Both empty in the Atlantic Ocean. Along the length of both rivers

porous aquifers exist, with a moderate groundwater potential (Figure 5). Namibia's famous desert-adapted elephants occur along the lower stretches of these two rivers, where they depend on the water and riverine vegetation to survive.

Three of the target areas for exploration (A1 – Bellavista; A3 – Belmont and A4 – Dieprivier in EPL 7031) are located in close proximity of the tributaries of the Aba Huab River.

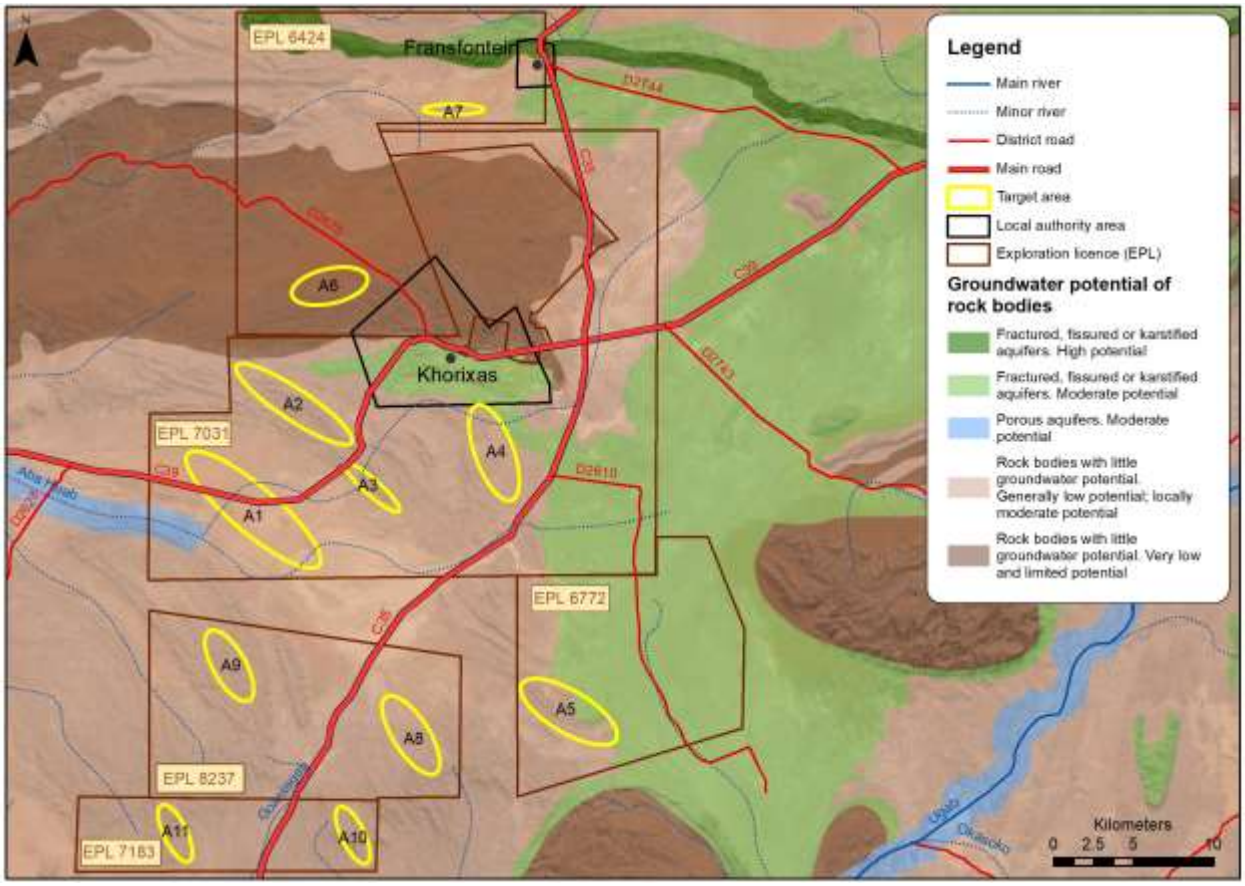


FIGURE 5 – HYDROLOGY OF EPL 6424, 6772, 7031, 7183 AND 8237

The general direction of groundwater flow is west to southwest in this part of the Kunene South groundwater basin (Christelis and Struckmeier, 2001). Groundwater potential associated with the limestone that constitutes also the Fransfontein Mountains is high; in fact, so high that a perennial fountain is the reason for the original establishment of Fransfontein.

A moderate groundwater potential is associated with a large part of the landscape outside the EPLs – to the east, closely associated with the Cenozoic sediments. The groundwater potential over the largest part of EPL 6722 is moderate while only small portions of EPL 7031 and EPL 6424 and the entire EPL 8237 and EPL 7183 show a moderate potential. The target area A5 -

Delta in EPL 6722 is located in close proximity of a terrain marked by the presence of fractures, fissures or karstified aquifers, i.e., where the groundwater potential is moderate. All other target areas are located in areas with a low to very low potential (see Figure 5 for more details).

Fransfontein and Khorixas are supplied with water from the local NamWater water infrastructure of boreholes, pipelines and reservoirs (see Figure 6). None of the targeted areas are in close proximity of the supply network. All five EPLs are otherwise characterized by clusters of people living together, in most cases around a local source of water such as a borehole. As many people in these clusters make a living from subsistence livestock farming, the local water sources are used by humans as well as their animals.

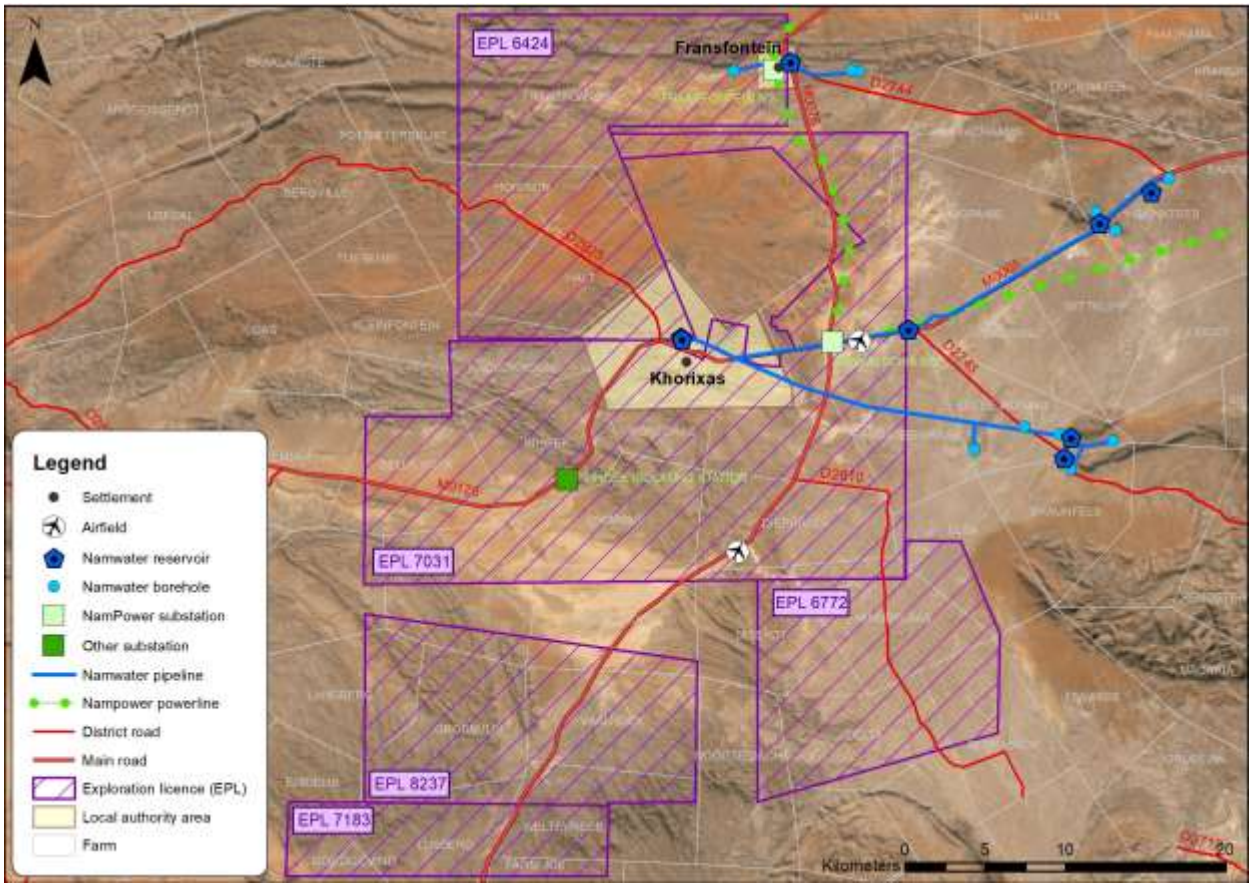


FIGURE 6 – WATER SUPPLY INFRASTRUCTURE

5.5 FLORA

Flora is associated with the *Western Highlands* vegetation type, within the *Acacia Tree-and-shrub Savanna* sub-biome (see Figure 7). Grass, scattered trees and shrubs determine the vegetation structure. Dominant species are *Acacia reficiens*, *Commiphora* species, *Euphorbia guerichiana*,

Maerua schinzii and *Adenolobus garipensis*. All target areas for exploration are located within this vegetation type.

To the west the vegetation becomes generally sparser and lower, showing a transition towards the *Central-western Escarpment and Inselbergs* vegetation type. *Acacia robynsiana*, *Sterculia africana*, *Cyphostemma currorri*, *Calicorema capitata* and *Ortanthera albida* are dominant species of this vegetation type. Where the soils are shallower, slopes are steeper and where it is hillier and rockier, the vegetation becomes progressively shrubby (Mendelsohn et al., 2002). Often, an increase in diversity is associated with an increase in elevation because of the differentiation in shelter, edaphic factors and micro-climatic conditions.

Most of the woody vegetation vary between 1 and 3 m in height, consisting mainly of thorny Acacia species, while Mopane (*Colophospermum mopane*) is also common, especially on soils with limestone and calcrete as a subsurface. Most of the grasses are annual and short-lived, which means that large tracts of land appear to be barren before the next rainy season.

Plant diversity is estimated between 150 and 299 species (Mendelsohn et al., 2002), although local differentiation is possible because of topography and the availability of water. The most important environmental variable affecting the vegetation is rain but micro-habitat conditions also play a role.

In areas where livestock is present, rangeland management practices determine bush density and grass composition. Grazing resources are made up of a wide variety of grass species, which vary widely in palatability and in their abundance. Because of the presence of livestock farming, vast stretches of land are affected by bush encroachment, with Mopane (*Colophospermum mopane*), Sickle bush (*Dichrostachys cinerea*), Deurmekaarbos (*Terminalia prunioides*) and Blackthorn (*Acacia mellifera),* the most abundant species.

In addition to the common *Colophospermum mopane*, several other protected tree species occur within the target areas. On deeper soil, flatter terrain and along drainage lines *Acacia erioloba*, *Euclea pseudebenus*, *Faidherbia albida, Combretum imberbe, Tamarix usneoides* and *Ziziphus mucronata* occur. *Albizia anthelmintica, Boscia albitrunca* and *Maerua schinzii* occur on a variety of terrains in the target areas while *Commiphora kraeuseliana, C. Saxicola, C. virgata, C. wildii, Moringa ovalifolia, Pachypodium lealii, Sesamothamnus guerichii, Sterculia Africana* and *S. quinqueloba* prefer higher elevations and rocky slopes. Although rare, *Welwitschia mirabilis* may occur in some of the western target areas.

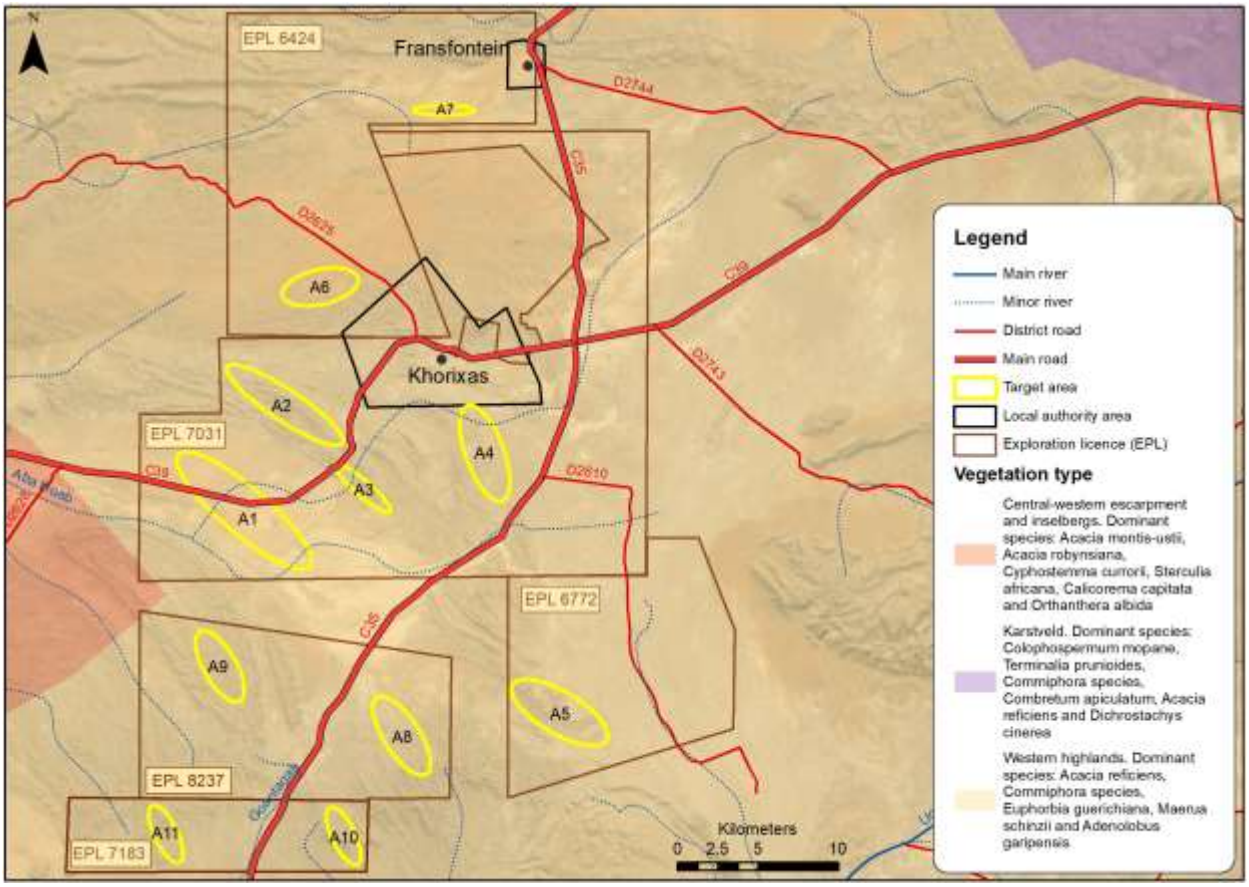


FIGURE 7 – VEGETATION OF EPL 6424, 6772, 7031, 7183 AND 8237

5.6 FAUNA

Overall terrestrial biodiversity of the surroundings ranges from medium to high. The number of mammal species ranges between 61 and 75, the number of bird species is between 141 and 170, with 71 – 80 reptile species, 4 – 7 frog species and 14 – 15 scorpion species that could be expected (Mendelsohn et al., 2002). On a local scale it is expected that diversity increases with the increase in habitats, which is closely coupled to shelter, food and water availability and migration routes. The micro-climate associated with an increase in elevation plays a prominent role in this regard and is directly related to the increase in terrestrial diversity.

The dominant land use of the surroundings is extensive agriculture, predominantly subsistence livestock rearing. To protect their livestock, farmers are required to manage predators such as cheetahs, leopards, caracals and jackals.

It is worthwhile to mention that Namibia's famous desert-adapted elephants occur along the lower stretches of the Ugab, Aba-Huab and Huab Rivers, mainly to the west of EPL 7031, EPL 8237

and EPL 7183. Other desert-adapted animals such as rhinoceros and lions occur further to the west, and outside the EPLs as well. Within the conservancies, wildlife is protected and managed communally.

5.7 AIR QUALITY

Vehicles travelling on the nearby national, district and secondary roads release carbon dioxide, carbon monoxide, oxides of nitrogen, particulate matter, sulphur dioxide and volatile organic emission. These vehicles are also responsible for wheel-entrained dust on the gravel roads that cross the EPLs. Dust generated from vehicles on the C35 and C39 roads is more in comparison with the D2625 and D2610 roads where the traffic is less.

Other potential sources of air pollution include:

- Residential use of wood for heating and cooking purposes;
- Biomass burning (veld fires);
- Bush clearance around homesteads and to increase the grazing capacity of farmland;
- Windblown dust from exposed surfaces and unpaved roads; and
- Charcoal making by heating wood (or other organic substances) in the absence of oxygen.

These sources are mainly associated with the release of airborne particulates, although combustion sources would also emit carbon dioxide, carbon monoxide, oxides of nitrogen, sulphur dioxide and volatile organic compounds.

No dust monitoring is currently taking place and the emissions listed above cannot be quantified.

5.8 Archaeology

No previous archaeological survey has been carried out in any of the EPLs. A desktop study / assessment for each of the five EPLs were conducted by Dr John Kinahan during the first half of 2021. The assessments considered low-resolution survey data from the surrounding landscapes as a basis of inference regarding the archaeological sensitivity of the EPLs (see Figure 8 and Appendix E).

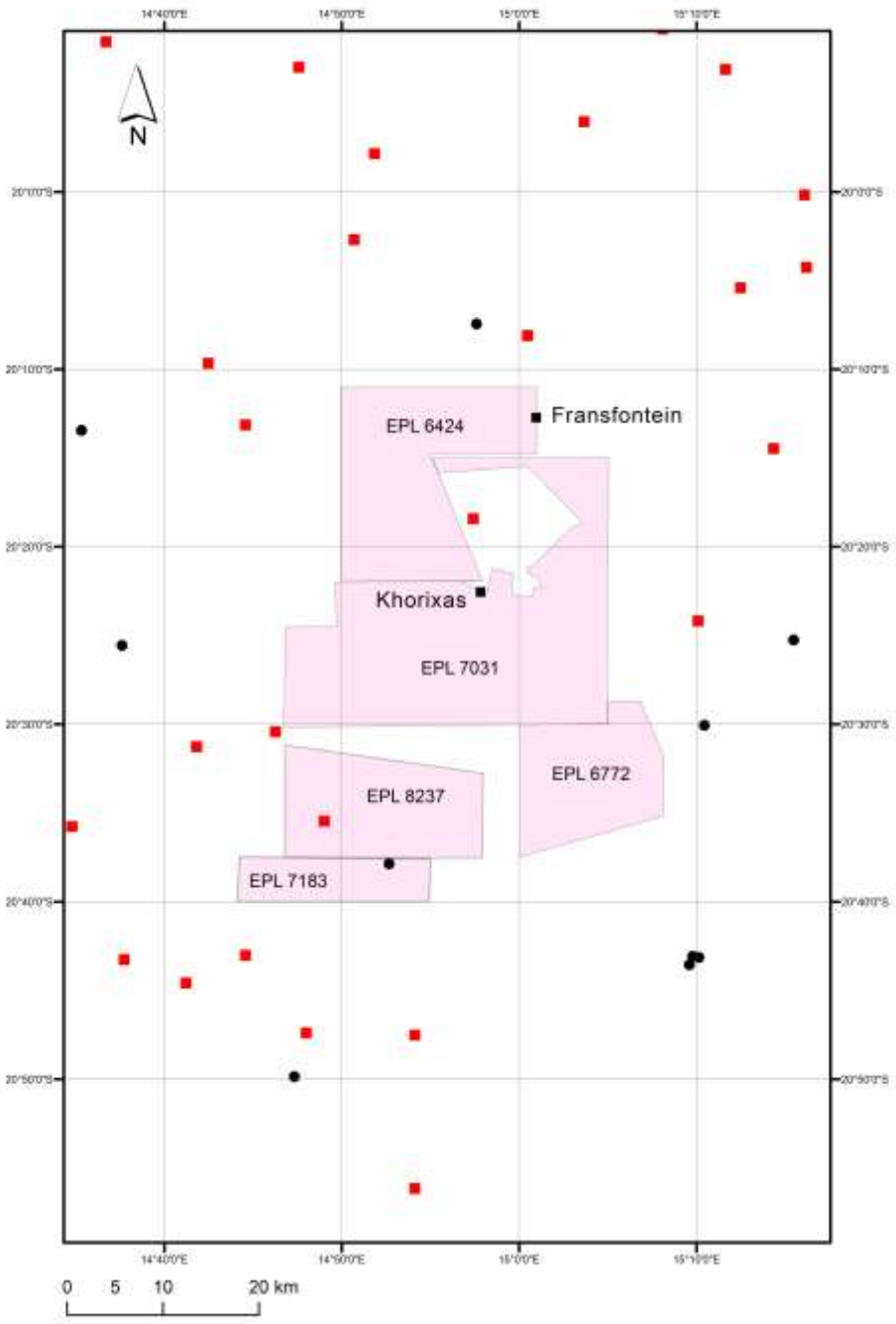


FIGURE 8 – LOCATION OF EPL 6424, 6772, 7031, 7183 AND 8237 IN RELATION TO THE KNOWN DISTRIBUTION OF HERITAGE SITES

*Known archaeological sites are indicated as black dots; sites of rock art are indicated as red squares

The data shows evidence of human occupation over the southern parts of the Kunene Region during the last million years, and almost continuously during the last 10,000 years. Evidence from the mid-Pleistocene includes crude stone implements while bifacial stone hand-axes and more complex tools were used during the Later Pleistocene. After the introduction of livestock, ceramics, metallurgy and domestic crops some 2,000 years ago Ovaherero people made a semi-nomadic existence in the northwest of Namibia, but environmental conditions deteriorated over time and the region became increasingly marginal. Many of the Ovaherero people moved from here to the central parts of Namibia as a result (Kinahan, 2021).

Evidence of human settlement is relatively dispersed over the south of the Kunene Region (i.e., where the EPLs are), and significant site concentrations are found mainly in the near vicinity of drainage lines, reliable springs and seepages – although some water sources that were important under periodic moist conditions during the Pleistocene are now completely dry, while other sources that have evidence only of more recent occupation may not have existed during the Pleistocene. Southwest of EPL 7183, the Omamgambo granites are marked by relatively dense concentrations of archaeological sites. Similarly, palaeontological sites are present in the late-Karoo formations to the west of EPL 7031. Engraving sites are associated with the Etjo and Twyfelfontein sandstones – even further to the west of EPL 7031.

The heritage specialist's reports conclude that no known archaeological site or documented rock art site occurs within the boundaries of EPL 6424, EPL 6772 and EPL 7031. Within the boundaries of EPL 8237 one single documented site of rock art exists and within the boundaries of EPL 7183 one single recorded archaeological site occurs (see Figure 8). The presence of these sites and the proximity of recorded sites determined the EPLs as likely to be archaeologically sensitive. It is possible that the EPLs could contain evidence of human occupation in the late Pleistocene and Holocene periods e.g., scatters of artefacts, debris, occupied rock shelters and overhangs, and rock art. In addition, the presence of burial sites is possible (Kinahan, 2021).

The possible presence of unrecorded heritage sites in the EPLs can only be confirmed by direct field assessment and more detailed survey and assessment should be carried out once the proponent has identified potential targets during the phase of non-invasive exploration activities. Based on this assumption, the specialist study strongly suggests detailed field surveys before a Mining Licence is granted. It is important to note that the granting of a Mining Licence is subject to the conducting of a separate, comprehensive (full) EIA process, which would include such a heritage specialist study. Until that time the proponent should be given consent to proceed with exploration provided that this does not include invasive exploration activities. If these methods

are to be employed, the proponent should be required to commission an archaeological assessment of the potential target areas (Kinahan, 2021).

The specialist assessment is limited to surface observations and existing low-resolution data. Hidden and buried archaeological or paleontological remains might be exposed as the project proceeds. There is a risk that these sites could be damaged through encroachment, disturbance and possible destruction, inappropriate siting of exploration camps equipment, supply laydowns and access routes. These potential impacts can seriously compromise the heritage of the area, and due to the fact that damage to these sites is essentially irreparable, the consequences of such impacts must be considered as permanent (Kinahan, 2021).

For interim purposes it is recommended that encroaching within 200 m of any granite outcrop should be avoided, and that any structures or cairns that may represent pre-colonial settlement, and grave sites should be avoided. It is also recommended that the project proponent adopts a Chance Finds Procedure devised for mining projects (Kinahan, 2021), as indicated in the Heritage Specialist Reports (See Appendix E) and the mitigation measures contained in the EMPs (see Appendix F). Important, the precautionary principle must be applied throughout – team members should be given training to know what heritage resources they may encounter and what to do in case a discovery is made.

5.9 Noise

Sources of noise in the EPLs include the following:

- Traffic on the C35, C39, D2625 and D2610 roads.
- Traffic on other roads.
- Agricultural activities.
- Urban noise associated with the built-up areas of Khorixas and Fransfontein.

As a result of the predominance of extensive agricultural activities and the rural setting of the EPLs, ambient noise levels are low.

5.10 Land use and closest sensitive receptors

5.10.1 LAND USE

Except for urban land use at Khorixas and Fransfontein, the majority of land in the EPLs is used for extensive farming activities, mainly for keeping small livestock, on communal land. Other land uses include tourism-related activities, mainly for travelling on existing roads. Despite the

presence of five conservancies, no tourism-based establishment except the Namibia Wildlife Resorts Camp, approximately 2.5 km outside Khorixas, are located within any of the EPLs.

The EPLs are located on rural land that is sparsely populated. Except for the roads and other infrastructure around Khorixas and Fransfontein, almost no other infrastructure occurs (Figure 6). One overhead powerline is crossing EPL 6424 and EPL 7031 from north to south and two main water pipelines provide the two urban settlements of water, both from the east. Population density is also relatively low, as many households make a subsistence, rural living.

5.10.2 CLOSEST SENSITIVE RECEPTORS

The closest sensitive receptors to the proposed target areas include the existing landowners and neighbours. Residents of Khorixas and Fransfontein are identified as receptors too. No other urban place occurs in any of the EPLs and all people outside Khorixas and Fransfontein live in isolated homesteads, often clustered together in close vicinity of each other, on communal land. Most of the communal land that overlaps with the EPLs is administered by traditional chiefs and five communal conservancies (//Huab**,** Doro !nawas, Sorris Sorris, !Khoro !goreb and Audi).

To ensure that potential receptors are identified prior to the commencement of the project, the relevant traditional chiefs and communal conservancies were identified as key stakeholders and engaged as I&APs.

6 ALTERNATIVES

Due to the nature and the scale of the proposed exploration activities, limited alternative options exist as described below.

6.1 Alternative Drilling Options

As explained in Section 4.1.3 of this report, some drilling options exist, depending on the results of Phase 1.

Diamond core drilling can achieve greater depths, delivers core samples to the surface, provides an idea of the hard rock and rock conditions that can be expected below ground and is a form of wet drilling. Wet drilling is favourable as it minimises the nuisance dust impact, from both an occupational health and an environmental point of view.

RC / percussion drilling is cheaper and faster to perform, however there is less accuracy, as rock samples are returned to the surface as powder or small cuttings and the below ground rock condition cannot be ascertained. It can, however, give an indication of the mineralisation (within specific limits).

6.2 Alternative Access Routes

All the access routes to the exploration sites (or target areas) have not yet been determined accurately. Although existing tracks will be used as far as possible, some additional access routes might be necessary, causing new impacts (dust, general disturbance to biodiversity, visual impacts, etc.). Access routes to designated exploration sites should thus be determined before any exploration activity is undertaken and incorporated in the planning process. The shortest route, avoiding big trees / protected species, is usually the preferred option.

In addition to the signed agreement between Exploration 18 (Pty) Ltd and the respective EPL-holders for the permission to conduct exploration activities on the EPLs, access agreements – as required by Section 52 of the Minerals (Prospecting and Mining) Act, No. 33 of 1992 – are required to ensure access to the eleven target areas.

Landowners and local residents are often aware of existing tracks and could provide details regarding the location and destinations of existing roads and tracks.

6.3 The "no-go" option

This option entails that no exploration activities are undertaken on the EPLs and upon expiration they will revert back to the MME. Should this happen, the economic and social growth associated

with the potential resource will not reach fruition, and Namibian economy will fail to benefit from a potential mineral resource. The advantage of this option would be that no exploration activities would take place on communal land and will not (potentially) negatively impact on the environment and or the local residents.

7 IDENTIFICATION OF POTENTIAL ENVIRONMENTAL ASPECTS AND IMPACT ASSESSMENT

The proposed exploration activities in the EPLs have the potential to impact on the environment. Environmental aspects and potential impacts were identified by the environmental team during the screening and scoping phases, in consultation with I&APs. Given the relatively small scale of the proposed activities and taking the existing environment into consideration, the potential impacts were also qualitatively assessed by Namisun.

Both the criteria used to assess the impacts and the method of determining the significance of the impacts are outlined in Table 8, Table 9 and Table 10.

Table 11 provides a summary of the activities associated with the exploration activities, the associated environmental aspects and potential impacts and also a qualitative assessment of these impacts (before and after mitigation).

This method complies with the Environmental Management Act, No. 7 of 2007 and its regulations. Table 8 provides the impact assessment criteria and the approach for determining impact consequence (combining nature and intensity, extent and duration) and impact significance (the overall rating of the impact). Impact consequence and significance are determined from Table 9 and Table 10 respectively. The interpretation of the impact significance is given in Table 8. Both mitigated and unmitigated scenarios are considered for each impact.

The potential impacts are cumulatively assessed, where relevant, taking the existing environment into consideration.

TABLE 8: IMPACT ASSESSMENT CRITERIA

IMPACT ASSESSMENT CRITERIA		
SIGNIFICANCE determination	**Significance = consequence x probability**	
CONSEQUENCE	**Consequence is a function of:** • **Nature and Intensity of the potential impact** • **Geographical extent should the impact occur** • **Duration of the impact**	
Ranking the NATURE and INTENSITY of the potential impact		
Negative impacts		
Low (L)	The impact has no / minor effect/deterioration on natural, cultural and social functions and processes. No measurable change. Recommended standard / level will not be violated. (Limited nuisance related complaints).	
Moderate (M)	Natural, cultural and social functions and processes can continue, but in a modified way. Moderate discomfort that can be measured. Recommended standard / level will occasionally be violated. Various third party complaints expected.	
High (H)	Natural, cultural or social functions and processes are altered in such a way that they temporarily or permanently cease. Substantial deterioration of the impacted environment. Widespread third party complaints expected.	
Very high (VH)	Substantial deterioration (death, illness or injury). Recommended standard / level will often be violated. Vigorous action expected by third parties.	
Positive impacts		
Low (L) +	Slight positive effect on natural, cultural and social functions and processes Minor improvement. No measurable change.	
Moderate (M) +	Natural, cultural and social functions and processes continue but in a noticeably enhanced way. Moderate improvement. Little positive reaction from third parties.	
High (H) +	Natural, cultural or social functions and processes are altered in such a way that the impacted environment is considerably enhanced /improved. Widespread, noticeable positive reaction from third parties.	
Very high (VH) +	Substantial improvement. Will be within or better than the recommended level. Favourable publicity from third parties.	
Ranking the EXTENT		
Low (L)	Local (confined to within the project concession area and its nearby surroundings).	
Moderate (M)	Regional (confined to the region, e.g. coast, basin, catchment, municipal region, district, etc.).	
High (H)	National (extends beyond district or regional boundaries with national implications).	
Very high (VH)	International (Impact extends beyond the national scale or may be transboundary).	
Ranking the DURATION		
Low (L)	Temporary/short term. Quickly reversible. (Less than the life of the project).	
Moderate (M)	Medium Term. Impact can be reversed over time. (Life of the project).	
High (H)	Long Term. Impact will only cease after the life of the project.	
Very high (VH)	Permanent	
Ranking the PROBABILITY		
Low (L)	Unlikely	
Moderate (M)	Possibly	
High (H)	Most likely	
Very high (VH)	Definitely	
SIGNIFICANCE Description		
	Positive	**Negative**
Low (L)	Supports the implementation of the project	No influence on the decision.
Moderate (M)	Supports the implementation of the project	It should have an influence on the decision and the impact will not be avoided unless it is mitigated.
High (H)	Supports the implementation of the project	It should influence the decision to not proceed with the project or require significant modification(s) of the project design/location, etc. (where relevant).
Very high (VH)	Supports the implementation of the project	It would influence the decision to not proceed with the project.

TABLE 9: DETERMINING THE CONSEQUENCE

DETERMINING THE CONSEQUENCE					
INTENSITY OF IMPACT = LOW					
DURATION	VH	Moderate	Moderate	High	High
	H	Moderate	Moderate	Moderate	Moderate
	M	Low	Low	Low	Moderate
	L	Low	Low	Low	Moderate
INTENSITY OF IMPACT = MODERATE					
DURATION	VH	Moderate	High	High	High
	H	Moderate	Moderate	High	High
	M	Moderate	Moderate	Moderate	Moderate
	L	Low	Moderate	Moderate	Moderate
INTENSITY OF IMPACT = HIGH					
DURATION	VH	High	High	Very High	Very high
	H	High	High	High	Very High
	M	Moderate	Moderate	High	High
	L	Moderate	Moderate	High	High
INTENSITY OF IMPACT = VERY HIGH					
DURATION	VH	Very high	Very High	Very High	Very high
	H	High	High	Very High	Very high
	M	High	High	High	Very High
	L	Moderate	High	High	Very High
		L	M	H	VH
		EXTENT			

TABLE 10: DETERMINING THE SIGNIFICANCE

DETERMINING THE SIGNIFICANCE					
PROBABILITY	VH	Moderate	High	High	Very high
	H	Moderate	Moderate	High	Very high
	M	Low	Moderate	High	High
	L	Low	Low	Moderate	High
		L	M	H	VH
		CONSEQUENCE			

TABLE 11: ENVIRONMENTAL ASPECTS AND POTENTIAL IMPACTS ASSOCIATED WITH EXPLORATION ACTIVITIES ON EPL 6424, 6772, 7031 AND 8237

Activity	Aspect	Potential Environmental Impact	Significance Discussion	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance	Ref
Geological studies, field mapping, rock and soil sampling											
Field mapping, rock and soil sampling	Biodiversity	Potential impact on fauna and flora (general disturbance and clearing of vegetation)	Limited disturbance of natural vegetation may occur as vehicles may have to drive off-road to access certain areas. However, it is of a very small scale, non-invasive, involving a limited number of vehicles and the proponent indicated that it is unlikely that significant clearing activities are foreseen. In the case of dense stands of common species (e.g., Acacia, Mopane and *Dichrostachys cinerea)* access to the specific areas will be on foot. Cutting down any species will be avoided.	Without	M	M	L	M	M	**M**	**1**
				With	L	L	L	L	L	**L**	
	Air quality	Increase in dust levels (nuisance and health impacts)	Where vehicles travel close to homesteads, the dust from the gravel tracks might be a nuisance to the people. Air pollution through vehicle emissions (i.e., exhaust fumes) and dust is, however, expected to be negligible due to the small scale of the project and limited number of vehicles to be used.	Without	**L**	**L**	**L**	**L**	**M**	**L**	**2**
				With	L	L	L	L	L	**L**	
	Heritage	Activities could result in possible damage to or destruction of heritage resources.	With reference to Section 5.8, no known archaeological / heritage sites were identified within EPL 6424, 6722 and 7031, but within EPL 8237 a single rock art site and within EPL 7183 an archaeological site are present. The EPLs are regarded as archaeologically sensitive though and hidden and buried sites might be exposed as the	Without	**M**	**VH**	**L**	**VH**	**M-H**	**M-H**	**3**
				With	**L**	**L**	**L**	**L**	**L**	**L**	

Activity	Aspect	Potential Environmental Impact	Significance Discussion	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance	Ref
			project proceeds. Although unlikely, exploration activities could result in possible damage to or destruction of heritage sites. With the implementation of mitigation measures under the EMP as well as the applying of a Chance Finds Procedure, this risk can be reduced to low.								
Drilling											
Drill site establishment: • Access the drill site (possibly creating a new access track) • Set-up drilling machine with drip trays and groundsheets • Establish temporary safety fencing around the drill site • Set-up portable toilet	Noise	Noise generated by the establishment of access tracks and drill site.	Should the activities take place in close proximity to a residence, the noise from these activities might be a nuisance impact.	Without	**L-M**	**L**	**L**	**L**	**L-M**	**L**	**4**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
	Biodiversity	Potential impacts on fauna and flora (general disturbance and clearing of vegetation). Unsupervised drilling personnel can impact on the biodiversity through illegal collection of firewood, poaching, road kills, off-road driving, etc.	Due to the fact that the activities are relatively small-scale and the fact that the exploration team will not be very big, potential poaching, road kills and collection of firewood and organisms can easily be managed through appropriate management and mitigation measures outlined in the EMPs, including supervision. Could result in possible loss of land available for livestock farming, however at a small scale. See also Impact Reference 1.	Without	**M**	**M**	**M**	**M**	**M**	**M**	**5**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
		Site clearance may allow for the establishment of weeds and invasive plants in the area.	The area is to be rehabilitated upon closure. Certain areas are currently characterised by bush encroachment (Refer to Section 5.5). However, management measures relating to the control of bush encroachment have been included in the EMPs.	Without	**L**	**M**	**M**	**M**	**M**	**M**	**6**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
	Land use			Without	**M**	**M**	**L**	**M**	**M**	**M**	**7**

Activity	Aspect	Potential Environmental Impact	Significance Discussion	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance	Ref
and ablution facilities		Loss off land capability due to site clearance.	Possible loss of grazing- or agricultural land. The rehabilitation of the site will allow for the continued use for grazing and or agricultural activities.	With	**L**	**L**	**L**	**L**	**L**	**L**	
	Heritage	Exploration activities could result in possible damage to or destruction of heritage resources.	See Impact Reference 3.	Without	**M**	**VH**	**L**	**VH**	**M-H**	**M-H**	**8**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
Drilling	Spillages of hydrocarbons, lubricants, or possible spills from portable toilet and ablution facilities	Soil pollution	Soil loss and contamination could have an impact on grazing animals. However, the area to be disturbed is very localized and on a small-scale, and impacts can be easily mitigated.	Without	**L**	**L**	**L**	**L**	**L**	**L**	**9**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
		Surface water contamination	With reference to Sections 5.4, tributaries of the dry Aba Huab River are located in close proximity of three target areas (A1, A3 and A4) in EPL 7031. Significant hydrocarbon spills could run into these dry riverbeds during rain events. Given the small area to be impacted per hole and large hydrocarbon spills being unlikely the potential for this impact is likely to be small. Mitigation measures can be found in the EMP.	Without	**M**	**M**	**M**	**M**	**L-M**	**L-M**	**10**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
		Groundwater could become polluted due to pollutants entering aquifers via surface water infiltration.	Given the magnitude of the project, small areas to be affected per hole and large hydrocarbon spills being unlikely, this impact is likely to be low, if mitigated. With reference to Section 5.4, all target areas, except one are located in areas where the groundwater potential is low to very low. None of	Without	**M**	**M**	**M**	**M**	**M**	**M**	**11**
				With	**L**	**L**	**L**	**L**	**L**	**L**	

Activity	Aspect	Potential Environmental Impact	Significance Discussion	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance	Ref
			the targeted areas are in proximity of the Namwater supply network.								
	Dust generated on access roads and tracks. Air pollution from exhaust fumes. Dust generation through drilling activities	Air quality deterioration. Increase in dust levels (nuisance and health impacts)	Where drilling activities are close to residences, the noise and dust from the activities might be a nuisance to the residents. Air pollution through vehicle emissions (i.e., exhaust fumes) is expected to be negligible due to the small scale of the project and limited number of vehicles or machinery to be used.	Without	**M**	**L**	**L-M**	**L-M**	**L-M**	**L-M**	**12**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
	Noise generation	Noise generated by the drill could disturb nearby residences (nuisance).		Without	**M**	**L**	**L-M**	**L-M**	**L-M**	**L-M**	**13**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
	Land use	Potential loss of land use and capability (very limited area) due to a combination of the above-mentioned impacts. Potential loss of grazing and wildlife.	See Impact Reference 7	Without	**M**	**M**	**L**	**M**	**M**	**M**	**14**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
Relevant to all activities											
All exploration activities	Socio-economic and	Inconvenience to residents and impacts on way of life	In the case of the exploration team being allowed unsupervised access, there is the potential for an increased risk of criminal activities such as	Without	**H**	**H**	**L**	**H**	**L-M**	**M-H**	**15**
				With	**L**	**L**	**L**	**L**	**L**	**L**	

Activity	Aspect	Potential Environmental Impact	Significance Discussion	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance	Ref
	community safety		poaching and theft and possible disturbance to immediate neighbours. The potential impacts on agricultural land are regarded as insignificant as the field mapping, surveying activities and soil sampling are non-invasive and will not damage any land. Drilling activities will be more invasive, but localized and temporary. The necessary management and mitigation measures are provided in the EMPs. Moreover, all exploration activities are very small-scale, involving a limited number of vehicles / people and can be easily managed through the implementation of the respective EMPs. Agreements between Exploration 18 (Pty) Ltd and the relevant landowners will be drafted, signed and put in place.								
	Waste Management	The dumping of general waste within the exploration area and drilling sites could prove hazardous to wildlife and livestock, as well as impede agricultural production. This could also lead to general environmental	Waste generation is likely to be limited onsite, will be contained and will primarily be domestic waste. Waste will be removed daily and disposed of properly off-site. Through the effective implementation of the management and mitigation measures, as described in the EMPs, the potential impacts relating to waste management can be avoided and or mitigated.	Without With	**M** **L**	**L** **L**	**M** **L**	**M** **L**	**M** **L**	**M** **L**	**16**

Activity	Aspect	Potential Environmental Impact	Significance Discussion	With and without mitigation	Nature and intensity	Duration	Extend	Consequence	Probability	Significance	Ref
		degradation and visual impacts.									
	Social – provision of portable toilet and ablution facilities	Health and safety issues	If suitable toilet facilities are not provided for the exploration team, they will relieve themselves in the environment which could lead to potential health and safety issues to 3rd parties.	Without	**L-M**	**L-M**	**L**	**L-M**	**M**	**L-M**	**17**
				With	**L**	**L**	**L**	**L**	**L**	**L**	
Closure and rehabilitation of drill site											
Remove all waste and equipment from site. Rip compacted areas (including access roads and paths).	Biodiversity, Visual.	Return site to natural state. No overall impacts.	The impacted sites will be rehabilitated in accordance with the EMP requirements.	**N/A**							**18**

With reference to Table 11, it can be seen that the activities and facilities associated with the exploration activities are unlikely to have high significant impacts on the environment if mitigation measure are implemented in accordance with the EMPs. Some of these impacts might have a moderate impact without any mitigation

8 WAY FORWARD

8.1 Way forward for the Scoping Report

The way forward is as follows:

- Submit the final Scoping Report to MME and upload onto the MEFT (DEA) online portal.
- MME and MEFT to review the final Scoping Report and the respective EMPs for each of the EPLs and provide record of decision.

9 ENVIRONMENTAL IMPACT STATEMENT AND CONCLUSIONS

The environmental aspects and potential impacts associated with the proposed exploration activities on EPLs 6424, 6772, 7031, 7183 and 8237 have been successfully identified and assessed as part of this EIA Scoping process. Relevant mitigation measures have been provided and are included in the EMPs that accompany the Scoping Report.

Namisun believes that a thorough assessment of the proposed project activities has been achieved and that environmental clearance certificates could be issued for the activities associated with each of the EPLs, on condition that the management and mitigation measures in the EMPs be adhered to by Exploration 18 (Pty) Ltd during the implementation of all associated exploration activities.

10 REFERENCES

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APPENDIX A: PROJECT TEAM CVS

- Appendix A (i) CV of Werner Petrick
- Appendix A (ii) CV of Pierre Smit

APPENDIX A (I) CV OF WERNER PETRICK

APPENDIX A (II) CV OF PIERRE SMIT

APPENDIX B: INFORMATION SHARING RECORD

- Appendix B (i) Background information document
- Appendix B (ii) Newspaper adverts
- Appendix B (iii) Site notices

APPENDIX B (I) BACKGROUND INFORMATION DOCUMENT

APPENDIX B (II) NEWSPAPER ADVERTS

APPENDIX B (III) SITE NOTICES

APPENDIX C: MEETINGS WITH STAKEHOLDERS

- Appendix C (i) Communication with stakeholders
- Appendix C (ii) Minutes of meetings
- Appendix C (iii) Attendance registers

APPENDIX C (I) COMMUNICATION WITH STAKEHOLDERS

APPENDIX C (II) MINUTES OF MEETINGS

APPENDIX C (III) ATTENDANCE REGISTERS

APPENDIX D: STAKEHOLDER DATABASE

APPENDIX E: HERITAGE SPECIALIST REPORTS

- Appendix E (i) Archaeological desk assessment of EPL 6424
- Appendix E (ii) Archaeological desk assessment of EPL 6772
- Appendix E (iii) Archaeological desk assessment of EPL 7031
- Appendix E (iv) Archaeological desk assessment of EPL 7183
- Appendix E (v) Archaeological desk assessment of EPL 8237

APPENDIX E (I) ARCHAEOLOGICAL DESK ASSESSMENT OF EPL 6424

APPENDIX E (II) ARCHAEOLOGICAL DESK ASSESSMENT OF EPL 6772

APPENDIX E (III) ARCHAEOLOGICAL DESK ASSESSMENT OF EPL 7031

APPENDIX E (IV) ARCHAEOLOGICAL DESK ASSESSMENT OF EPL 7183

APPENDIX E (V) ARCHAEOLOGICAL DESK ASSESSMENT OF EPL 8237

APPENDIX F: ENVIRONMENTAL MANAGEMENT PLANS

- Appendix F (i) Environmental Management Plan of EPL 6424
- Appendix F (ii) Environmental Management Plan of EPL 6772
- Appendix F (iii) Environmental Management Plan of EPL 7031
- Appendix F (iv) Environmental Management Plan of EPL 7183
- Appendix F (v) Environmental Management Plan of EPL 8237

APPENDIX F (I) ENVIRONMENTAL MANAGEMENT PLAN OF EPL 6424

APPENDIX F (II) ENVIRONMENTAL MANAGEMENT PLAN OF EPL 6772

APPENDIX F (III) ENVIRONMENTAL MANAGEMENT PLAN OF EPL 7031

APPENDIX F (IV) ENVIRONMENTAL MANAGEMENT PLAN OF EPL 7183

APPENDIX F (V) ENVIRONMENTAL MANAGEMENT PLAN OF EPL 8237