



**COPY**

REFERENCE: ECC-59-301-LET-08-A

20 February 2023

Environmental Commissioner  
Ministry of Environment, Forestry and Tourism  
Private Bag 13306  
Windhoek  
Namibia

**RECEIVED BY OFFICIAL STAMP**

Received by Name: \_\_\_\_\_  
Date: \_\_\_\_\_  
Signature: \_\_\_\_\_  
MINISTRY OF ENVIRONMENT,  
FORESTRY AND TOURISM  
DIRECTORATE OF ENVIRONMENTAL AFFAIRS

**23 FEB 2023**

RECEIVED 1  
Signature: \_\_\_\_\_

**FOR ATTENTION: MR. TIMOTEUS MUFETI**

Dear Mr. Timoteus Mufeti,

**RE: EXEMPTION REQUEST: HERITAGE ASSESSMENT NEEDED FOR EXPLORATION ACTIVITIES ON EPL 8572 AND EPL 8573. KUNENE REGION NAMIBIA**

Skorpion Mining Company (Pty) Ltd has engaged the services of Environmental Compliance Consultancy (ECC) to undertake an environmental and social impact assessment on two of their EPLs, namely EPL 8572 and 8573, situated in the Opuwo area of the Kunene Region. The assessments have been finalized, and the final applications in hard copy were submitted to your office on September 2, 2022.

As the environmental clearance portal was offline during that period, the application could not be uploaded to the portal. Subsequently, the applications were registered on the portal on November 1, 2022, and were assigned the following application numbers:

- EPL 8572 - APP221101000232
- EPL 8573 - APP221101000233

After the applications were registered, we were informed of the necessary deliverables that are required to be submitted with the application. One of the key deliverables is a heritage assessment.

Through both the field and desktop studies conducted by ECC, there were no significant heritage or archaeological artifacts, or heritage sites observed. Multiple site visits have taken place (attendance registers and site visit photos attached) from February to June 2022 in order to obtain heritage consent from the communities that may be affected and their respective traditional authority representatives. During these site visits any graves, sites or artifacts of heritage and archaeological relevance for preservation were already identified and documented.

Traditional authority was granted by all the various traditional leaders under which these EPLs fall (proof of consent attached) and was submitted to the Ministry of Mines and Energy on the 25<sup>th</sup> of February and 20<sup>th</sup> of March 2022.

As part of the ESIA and ECC application process, the EMP includes a heritage management plan and a chance find procedure should the proponent uncover heritage or archaeological sites or artifacts while conducting exploration activities.

On the grounds that there has been thorough public engagement and that exploration activities of the proponent have minimal invasive elements we see no reason as to why the Ministry should withhold providing a record of decision on these EPL applications in the absence of a heritage study.

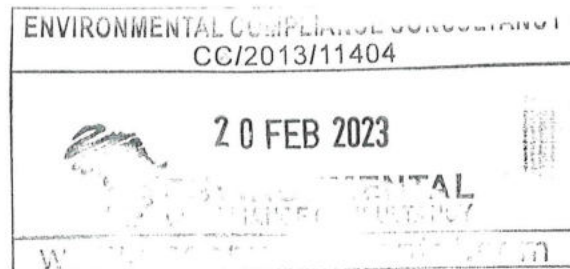
Yours sincerely,



Stephan Bezuidenhout  
Environmental Compliance Consultancy  
Office: +264 81 669 7608  
Email: [stephan@eccenvironmental.com](mailto:stephan@eccenvironmental.com)



Jessica Bezuidenhout Mooney  
Environmental Compliance Consultancy  
Office: +264 81 669 7608  
Email: [jessica@eccenvironmental.com](mailto:jessica@eccenvironmental.com)















ECC public consultation with community members







ECC public consultation with traditional authorities

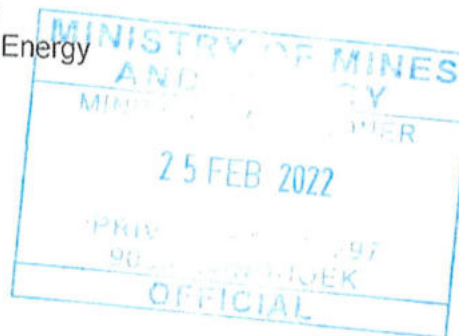
## Traditional authority consents

COPY

25 February 2022

Mr. Erasmus Shivolo  
Mining Commissioner  
Ministry of Mines and Energy  
1 Aviation Road  
Private Bag 13297  
Windhoek  
Namibia

Mr. Westley Price  
Deputy Head of Exploration: Vedanta Zinc  
International  
Direct Line: +27 54 983 9241  
Direct Fax:  
Mobile: +27 64 680 4014  
E-mail: [WPrice@vedantaresources.co.za](mailto:WPrice@vedantaresources.co.za)



Dear Mr. Shivolo,

**RE: APPLICATION FOR EXCLUSIVE PROSPECTING LICENCES – 8571, 8572, 8573, ADDITIONAL INFORMATION REQUIRED**

With reference to your request for additional information (dated 07 December 2021) as well as your permission granted for an extension to 28 February 2022 (dated 06 January 2022), Skorpion Mining Company have made progress in this regard.

A site visit was conducted during February with the aim to consult with all Traditional Authorities (TAs) relating to the three EPLs.

- **EPL8571:** The team was unable to reach TA representatives due to flash flooding of rivers, cutting off vehicle access to the relevant areas; We have made contact with a representative living close to the river whom will advise once water levels are lower and safe to cross.
- **EPL8572:** Engaged with four Traditional Chiefs of the Oukongo Tjiuruga Traditional Authority, Otjiurunga Traditional Authority, Otjikaoko Traditional Authority and Otjiurunga Traditional Authority; TA consent received in good spirit and is attached for your records and in turn granting of EPL 8572.
- **EPL8573:** Engaged with Chief Katerwangombe with less success. Chief Katerwangombe requested that we return on 15 March 2022 for further discussion as their previous experience with exploration companies was not favourable.

Taking the above act of nature as well as the request from Chief Katerwangombe into account, Skorpion Mining Company would like to request a further extension to obtain TA consent for the two remaining EPLs until 30 April 2022. This will allow us to engage with the communities further and allow us access to the isolated community blocked due to the flooding.

It is important to the Company that all stakeholders involved in our exploration efforts be well informed of the Company's intension and also that these stakeholders support the company in our efforts.

We trust that you will find this timeframe acceptable, and we will ensure to keep your Office informed of any developments in this regard.




LETTER OF CONSENT

I, Chief K. Ngorera am a Traditional Authority representative of  
Otiurunga Traditional Authority In the Kunene Region.

I hereby give consent for Skorpion Mining Company (Pty) Ltd to obtain exclusive prospecting  
licence for exploration activities for EPL 8592.

I understand that a land access agreement will be entered into once the EPL licence is granted.

Therefore I sign below,

 Date: 21/02/2022

Witness,

Muheni Date: 21/02/2022





LETTER OF CONSENT

I, Chief Matheus Ruhozu am a Traditional Authority representative of  
Oukongo Tjurunga Traditional In the Kunene Region.

I hereby give consent for Skorpion Mining Company (Pty) Ltd to obtain exclusive prospecting  
licence for exploration activities for EPL 8572

I understand that a land access agreement will be entered into once the EPL licence is granted.

Therefore I sign below,

M Ruhozu Date: 21/02/2022

Witness,

[Signature] Date: 21/02/2022

## LETTER OF CONSENT

I, Ngarikutuk Rukuvu am a Traditional Authority representative of  
Ogikunga Traditional Authority In the Kunene Region.

I hereby give consent for Skorpion Mining Company (Pty) Ltd to obtain exclusive prospecting licence for exploration activities for EPL 8572

I understand that a land access agreement will be entered into once the EPL licence is granted.

Therefore I sign below,

[Signature] Date: 21/02/2022

Witness,

T. J. J. Date: 21/02/2022





COPY

+264 81 669 7608

info@eccenvironmental.com

www.eccenvironmental.com

ECC Ref: ECC-99-378-LET-02-A

18 March 2022

Ministry of Mines and Energy  
Directorate of Mines  
1 Aviation Road  
Private Bag 13297  
Windhoek, Namibia



**COPY TO:** EXECUTIVE DIRECTOR – MR SIMEON NEGUMBO  
**FOR ATTENTION:** MINING COMMISSIONER – MR ERASMUS SHIVOLO

Dear Mr Shivolo,

**RE: SUBMISSION OF TRADITIONAL AUTHORITY CONSENTS FOR THE APPLICATIONS OF EXCLUSIVE PROSPECTING LICENCES - 8571, 8572, 8573**

Vedanta Zinc International (Pty) Ltd engaged Environmental Compliance Consultancy (ECC) to assist in the stakeholder engagement process to obtain consent from the relevant Traditional Authorities for their EPL applications as requested by MME.

As per Vedantas letter submitted to your office on 25 February 2022 (hereto attached) Traditional Authority consent was granted and provided to your Office for EPL 8752.

This same letter set out the clients request to you, for an extension until 30 April 2022 to obtain the consents for the remaining two EPLs 8571 and 8573.

We are pleased to inform you that several positive meetings were held with the Traditional Authorities this week from the 14<sup>th</sup> – 15<sup>th</sup> March 2022, and consent was granted by the

Traditional Authorities for EPL 8571 and EPL 8573 on the 15<sup>th</sup> March 2022, these consents are hereto attached.

COPY

It is our client's understanding that this, therefore, concludes the requirement from your office to obtain the required Traditional Authority consents in order to grant the three EPLs.

Should you need further information or assistance from our office please do not hesitate to contact us.

Yours sincerely,



Stephan Bezuidenhout  
Environmental Compliance Consultancy  
Contact: 081 669 7608  
Email: [info@eccenvironmental.com](mailto:info@eccenvironmental.com)



Jessica Bezuidenhout (Mooney)  
Environmental Compliance Consultancy





## LETTER OF CONSENT

I, chief vehimba Muharukua am a Traditional Authority representative of  
Otjikao Traditional Authority In the Kunene Region.

I hereby give consent for Vedanta to obtain exclusive prospecting licence for exploration activities  
for EPL 3571.

I understand that a land access agreement will be entered into once the EPL licence is granted.

I sign below,

Date: 15/05/2022

Witness,

Date: 15/05/2022

LETTER OF CONSENT

I, Mbitjita Muhenje am a Traditional Authority representative of  
Ngombe Traditional Authority In the Kunene Region.

I hereby give consent for Skorpion Mining Company (Pty) Ltd to obtain exclusive prospecting  
licence for exploration activities for EPL 8573.

I understand that a land access agreement will be entered into once the EPL licence is granted.

Therefore I sign below,



Date: 15/03/2022

Witness,

Ngombe

Date: 15/03/2022



LETTER OF CONSENT

I, Liatembua Muharukua am a Traditional Authority representative of  
Muharukua Traditional Authority In the Kunene Region.

I hereby give consent for Skorpion Mining Company (Pty) Ltd to obtain exclusive prospecting  
licence for exploration activities for EPL 8573.

I understand that a land access agreement will be entered into once the EPL licence is granted.

Therefore,  below,

\_\_\_\_\_  
Date: 15/03/2022

Witness,

  
\_\_\_\_\_  
Date: 15/03/2022