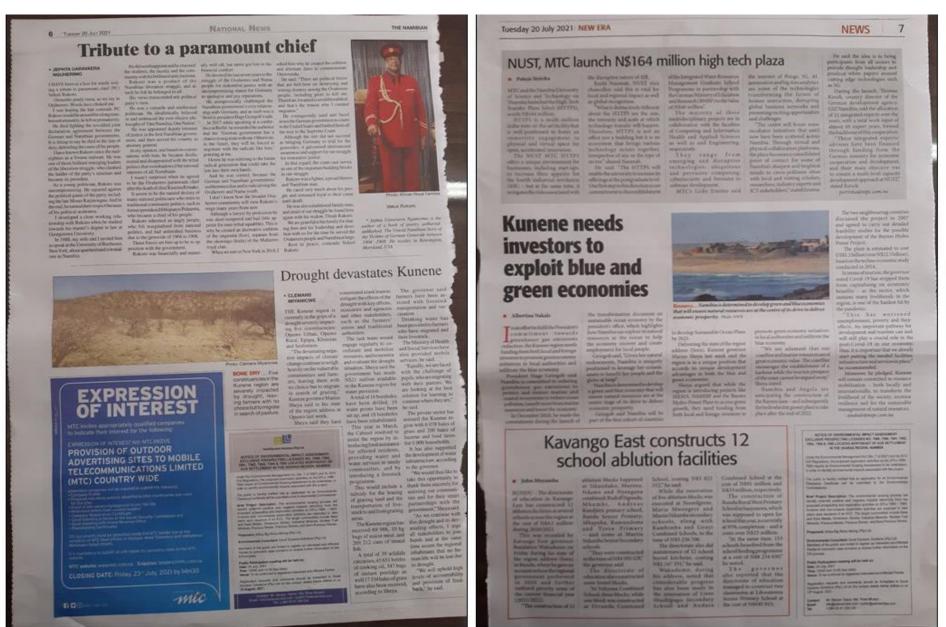
# APPENDIX F: NEWSPAPER ADVERTS (13 July, 2021)





# **APPENDIX F: NEWSPAPER ADVERTS (20 July, 2021)**





# List of Stakeholders/Interested and Affected Parties (I&APs)

# Environmental Scoping Assessment for Exclusive Prospecting Licence (EPL) No. 7989-7995 Located Northeast of Aus Settlement in The ||Karas Region, Namibia.

No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address	
		The Environmental Assessment Practitioner (EAP)	/ Environmental Consultant		
1.	Mr. Nerson Tjelos	Environmental Assessment Practitioner : Excel  Dynamic Solutions Pty Ltd	Tel: +264 (0) 61 259 530 Cell: +264(0) 81 310 369 1	P. O. Box 997154 Maerua Mall, Windhoek public@edsnamibia.com	
	The Project Proponent (Africa Big Rhino (Pty) Ltd)				
2.	Mr. Ben Xu	Director: Africa Big Rhino Mining (Pty) Ltd			
	Ministr	y of Environment, Forestry and Tourism (Department o	of Environmental Affairs and F	Forestry)	
3.	Mr. Teofilus Nghitila	Executive Director	Tel: +264 (0) 61 284 275 1 Fax: +264 (0) 61 240 339	Private Bag 13306, Windhoek teofilus.nghitila@met.gov.na	
4.	Mr. Timoteus Mufeti	Environmental Commissioner	Tel: +264 (0) 61 284 271 5	Private Bag 13306, Windhoek <u>Timoteus.Mufeti@meft.gov.na</u>	



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address	
5.	Mr. Fillemon Kayofa	Acting Director: Forestry	Tel: +264 (0) 61 208 732 0	Private Bag 13306, Windhoek Fillemon.Kayofa@meft.gov.na	
6.	Ms Vanessa Stein	Forester: National Botanical Research Institute (NBRI)	Tel: +264-61-202 201 3 Fax: +264-61-258153	Vanessa.Stein@mawf.gov.na	
	Ministry of Mines and Energy				
7.	Mr. Simeon Negumbo	Executive Director	Tel: +264 (0) 61 284 811 1 Fax: +264 (0) 61 238 643/ 220 386	Private Bag 13297, Windhoek Simeon.Negumbo@mme.gov.na	
8.	Mr. Erasmus Shivolo	Mining Commissioner	Tel: +264 (0) 61 284 811 1 Fax: +264 (0) 61 238 366	Erasmus.Shivolo@mme.gov.na	
		Ministry of Agriculture, Water and I	_and Reform		
9.	Mr. Percy W. Misika	Executive Director (ED)	Tal: .264 (0) 61 209 764 0	Private Bag 13184, Windhoek	
10.	Ms. Justy Matheus	Secretary to the ED	Tel: +264 (0) 61 208 764 9	ED@mawf.gov.na ED@mawlr.gov.na	
11.	Mr. Petrus Nangolo	Director: Land Reform	Tel: +264 (0) 61 296 510 3	Petrus.Nangolo@mawlr.gov.na	



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address	
		Ministry of Works and Trans	sport		
12.	Ms Esther Kaapanda	Executive Director (ED)	Tel: +264 (0) 61 208 882 2	Private Bag 13341, Windhoek <u>Esther.Kaapanda@mwt.gov.na</u>	
13.	Ms. Charleen Benade	Secretary to the ED	Fax: +264 (0) 61 228 560	pssecretary@mwt.gov.na	
14.	Ms. Monica A. Uupindi	Personal Assistant to Executive Director	Tel: +264 (0) 61 208 883 1 Fax: +264 (0) 61 228 560	Private Bag 13341, Windhoek muupindi@mwtc.gov.na	
	Ministry of Urban and Rural Development				
15.	Mr. N Daniel	Executive Director	Tel: +264 (0) 61 297 518 0 Fax: +264 (0) 61 258 131	Private Bag 13289, Windhoek ndaniel@murd.gov.na	
16.	Ms. Rosalia Ruben	Secretary to Executive Director	Tel: +264 (0) 61 297 518 0 Fax: +264 (0) 61 258 131	Private Bag 13289, Windhoek  Rruben@murd.gov.na	
17.	Ms. B. van Wyk	Personal assistant to the ED	Tel: +264 (0) 61 297 518 0 Fax: +264 (0) 61 258 131	Private Bag 13289, Windhoek bvanwyk@murd.gov.na	
	Ministry of Labour, Industrial Relations & Employment Creation				
18.	Ms. Lydia Indombo	Acting Executive Director	Tel: +264 (0) 206 632 4	Private Bag 19005, Windhoek <u>Lydia.Indombo@mol.gov.na</u>	
		Roads Authority			



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address	
19.	Mr C. M. Lutombi	Chief Executive Officer	Tel: +264 (0) 61 284 707 4 Fax: +264 (0) 61 284 715 8	Private Bag 12030, Ausspannplatz <u>lutombiC@ra.org.na</u>	
20.	Mr E. de Paauw	Senior Specialist Road Legislation, Advice & Compliance NP&C	Tel: +264 (0) 61 284 702 7 Fax: +264 (0) 61 284 715 1	P/Bag 12030, Ausspannplatz dePaauwe@ra.org.na	
		National Heritage Counc	sil		
21.	Mrs Erica Ndalikokule	Acting Director	Tel: +264 (0) 61 301 190 3	erica@nhc-nam.org	
22.	Ms Agnes Shiningayamwe	Regional heritage officer	Tel: +264 (0) 61 301 190 3	rho1@nhc-nam.org	
23.	Mr Manfred Gaeb	Regional heritage officer	Tel: +264 (0) 61 301 190 3	rho2@nhc-nam.org	
24.	Ms Lucia	Administrator	Tel: +264 (0) 61 301 190 3	luciapermitsnhc@gmail.com	
		∣∣Karas Regional Counc	il		
25.	Hon. Aletha Frederick	Governer: //Karas Region	Tel: +264 (0) 63 - 225627/221943	shiati.kido@gmail.com	
26.					
	Berseba Constituency Office				
27.	Hon. Jeremias Goeieman	Councillor: Berseba Constituency	Tel: 063 – 257215/222171		



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address		
	Affected Farms and Land Users					
28.	Koiras 28	Okuuta Investments CC		P.O. Box 14, Helmeringhausen		
29.	Nabibis 30	Bacap (Pty) Ltd		P.O. Box 147, Rosh Pinah		
30.	Gamochas 31	Ludwig Wilhelm Schnebel		P.O. Box 11382, Klein Windhoek		
31.	Karadaus 32	Elizabeth Johanna Cilliers		P.O. Box 9, Mariental		
32.	Ptn 1 of farm Karadaus 32	Frederick Gideon Rudolph Kotze		P.O. Box 85, Bethanie		
33.	Ptn 2 of farm Karadaus (Kotzerus) 32	Leolana Investments (Pty) Ltd		P.O. Box 26, Helmeringhausen		
34.	Rem of Farm Tiras 33	Klaus Peter Theodor Willi Kock		P.O. Box 2558, Windhoek		
35.	Ptn 1 of Farm Tiras 33	Willem Jacobus De Waal		P.O. Box 60, Aus		
36.	Rem Neisip 34	Ludwig Wilhelm Schnebel		P.O. Box 11382, Klein Windhoek		



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address
37.	Ptn (Neisip Wes) of farm Neisis 34	Neisip Farming cc		P.O. Box 3675, Windhoek
38.	Aris 35	Wilhelm Stefanus & Yolanda Steenkamp		P.O. Box 138, Rosh Pinah
39.	Umub 42	Umub Ranch (Pty) Ltd		P.O. Box 566, Keetmanshoop
40.	Zuurberg 46	Levie & Marenda Josephina Boois		P.O. Box 84, Bethanie
41.	Rem of farm Ausis 47	Benno Albert Groenewaldt		P.O. Box 5598, Ausspannplatz Windhoek
42.	Ptn 2 of farm Ausis 47	Bonsec Investments Seventy five cc		P.O. Box 2080, Keetmanshoop
43.	Ptn 1 of farm Ausis 47	Frederick Gideon Rudolph Kotze		P.O. Box 85, Bethanie
44.	Rem of farm Chamis Sud 49	Government of Republic of Namibia		Private Bag 13343, Windhoek
45.	Nuweplaas 123	Frederick Gideon Rudolph Kotze		P.O. Box 85, Bethanie



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address
46.	Ptn 2 of Ptn 1 of farm Frisgewaagd 124	The Trustees for the time being of the Coleman Family Trust		P.O. Box 11267, Klein Windhoek
47.	Rem of Ptn 1 of farm Frisgewaagd 124	The Trustees for the time being of the Coleman Family Trust		P.O. Box 11267, Klein Windhoek
48.	Houmoed 128	Armin May		Bahnhofstr 10, 37249, Nieu- Erchenberg, Germany
49.	Twyfel 129	Jacobus Johannes Loofs		P.O. Box 36, Bethanie
50.	Wegkruip 130	Daniel Jacobus van Staden		P.O. Box 51, Bethanie
51.	Hansburg 131	Bonsec Investments One Zero Nine cc		P.O. Box 81, Bethanie
52.	Carolinahof 132	Jacobus Johannes Theron Brandt		P.O. Box 315, Karibib
53.	Radfordsputs 137	Jacob Jacobus & Loraine De Waal		P.O. Box 117, Bethanie
54.	Ganikeis 138	Joseph Kahuika		P.O. Box 1814, Keetmanshoop



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address
55.	Damalius 167	Farm Damalius (Pty) Ltd		P.O. Box 358, Rosh Pinah
56.	Laryn 187	Nicolaas Jacobus Bosman		P.O. Box 8, Bethanie
		Identified & Registered relevant Non-Governmen	ntal Organizations (NGOs)	
57.	Dr. Christopher Brown	Namibian Chamber of Environment (NCE)	Tel: +264 (0) 61 240 140 Cell: +264 (0) 81 162 580 7	P.O Box 40723, Ausspannplatz, Windhoek ceo@n-c-e.org admin@n-c-e.org
58.	Mrs. Herta Kolberg	Botanist: Herta Kolberg Botanical Consulting	Tel: +264 (0) 61 220 701 Cell: +264 (0) 81 214 415 6	P.O Box 97424, Maerua Park, Windhoek boscia@afol.com.na
59.	Petri Oberholzer/ Hermien Oberholzer	Aus Farmers's Association		ausbvnam@gmail.com
60.	Thys Blaauw/ Lizelle Murray	Helmeringhausen Farmer's Association		thys.blaauw@gmail.com / murrayzel@gmail.com
61.	Francios du Plessis	Naankuse Wildlife experience	Cell: +264 (0) 84 000 919 0	francios@naankuse.com
62.	Rudie van Vuuren	Naankuse Wildlife experience	Tel: +264 (0)61-228 869	rudie@naankuse.com
63.	Waylon Zandberg	Naankuse Wildlife experience	Tel: +264 (0)61-228 869	Waylon@naankuse.com



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address
64.	Dawie Minnaar	Naankuse Wildlife experience	Tel: +264 (0)61-228 869	dawie@naankuse.com
65.	Zane Lombaard	Naankuse Wildlife experience	Tel: +264 (0)61-228 869	zane@naankuse.com
		Other Registered Interested & Affected Parties (I&A	APs) / Members of the Public	
66.	Salomon Isaak	Aus Community Member	Cell: +264 (0) 81 688 341 7	
67.	Thorsten Theile	Namtib Biosphere Reserve	Tel: +264 (0) 63 683 055	contact@namtib.net
68.	Walter Theile	Farm Namtib	Tel: +264 (0) 63 683 754	rewana@namtib.net
69.	Renate Theile	Farm Namtib	Tel: +264 (0) 63 683 754	
70.	Deox Engelbrecht	Aus Community Member	Cell: +264 (0) 81 847 127	
71.	Chris Cornelius	Aus Community Member	Cell: +264 (0) 81 274 141 4	
72.	Vincent. T. Eiseb	Marmer Primary School	Cell: +264 (0) 81 325 572 2	vincenteiseb1@gmail.com
73.	Stefanus Boois	TransNamib	Cell: +264 (0) 81 355 816 6	
74.	Barbara Boehv	Farm AAR	Cell: +264 (0) 81 222 597 9	barbara.boehm.esni@gmail.com
75.	Piet Swigers	Klein Aus Investa cc	Cell: +264 (0) 81 407 069 1	info@klein-aus-vista.com
76.	A Schnebel	Welgemoed Farming	Cell: +264 (0) 81 294 533 4	schnebel@afol.com.na



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address
77.	P.J. Oberholzer	Tiras Nr. 109	Cell: +264 (0) 81 767 383 3	farmtiras1@gmail.com
78.	B. Roener	Bahnhof Hotel	Cell: +264 (0) 81 127 619 1	bele@aus-accomodation.com
79.	Willem Swieger	Klein Aus Vista	Cell: +264 (0) 81 228 230 5	willem@klein-aus-vista.com
80.	Harald Marggraff	Farm Gamochas No. 31 & Neisep No. 34	Tel: +264 (0) 812807228 / 062 549125	marggraff@iway.na
81.	Heimo Koch	Tiras Conservancy		Heimo.Koch@na.gt.com
82.	Leon Hoffmann	Duinisig 136	Tel: +264 (0) 813530002	lhoffmann@zoho.com
83.	T. Frederick		Cell: +264 (0) 81 372 324 4	
84.	H. Kabindu			
85.	L. Kaffer			
86.	Isak Boois	Aus	Cell: +264 (0) 81 210 403 2	
87.	Denever Vlees	Aus	Cell: +264 (0) 81 424 196 6	
88.	Josef Swartz	Acct	Cell: +264 (0) 81 250 438 1	Robswartz@gmail.com
89.	Willem Swartz	Aus		
90.	Benedictus Dors	Aus	Cell: +264 (0) 81 221 214 2	dorsbenedictus@gmail.com



No	Name	Position & Organization	Tel / Fax / Cell No.:	Postal and Email Address
91.	C Rogs	Aus	Cell: +264 (0) 81 690 574 2	
92.	Shanika Ludwig	Aus	Cell: +264 (0) 85 753 277	Ludwignarisha@gmail.com
93.	Hennie Subert	Aus	Cell: +264 (0) 81 647 661 5	
94.	Herold Dors		Cell: +264 (0) 81 250 458 3	
95.	Mervin Fredericks		Cell: +264 (0) 81 230 558 0	
96.	Leon Murphy		Cell: +264 (0) 81 319 100 6	



Physical Address: 112, Robert Mugabe Avenue, Windhoek
Postal Address: PO Box 997154 Maerua Mall, Windhoek

Email: info@edsnamibia.com Web: www.edsnamibia.com

Document Type: Background Information Document (BID)

Project Name: Environmental Assessment (EA) For Exclusive

Prospecting Licenses (EPLs) No. 7989, 7990, 7991,

7992, 7993, 7994 & 7995 Located Northeast of Aus

Settlement in the ||Karas Region, Namibia

**Environmental Assessment Practitioner: Excel Dynamic Solutions (Pty) Ltd** 

Proponent: Africa Big Rhino Mining (Pty) Ltd

**July 2021** 

#### 1 INTRODUCTION AND BACKGROUND

Africa Big Rhino Mining (Pty) Ltd (*The Proponent*) intends to conduct mineral prospecting and exploration activities on their seven Exclusive Prospecting Licenses (EPLs) 7989, 7990, 7991, 7992, 7993 and 7995, located near Aus in the ||Karas Region. The tenure for exploration on these EPLs is granted for works between 23 March 2021 and 22 March 2024. The Proponent has also lodged an application for EPL 7994 in the same location. The EPLs are located approximately 35 km northwest of Aus Settlement (**Figure 1**) and cover a total area of 449,357.11 ha. Collectively, the area covered by the seven EPLs is prospective to seven (7) commodity groups, which include: **Base and Rare Metals, Dimension Stones, Industrial Minerals, Nuclear Fuel Minerals, Precious Metals, Precious Stones, and Semi-Precious Stones.** 

The Proponent intends to conduct prospecting and exploration activities leading to the estimation and delineation of the target resources. Prospecting and exploration form part of the listed activities that may not be undertaken without an Environmental Clearance Certificate (ECC), in terms of the Environmental Management Act (Act 7 of 2007) (EMA).

The relevant listed activities as per 2012 Environmental Impact Assessment (EIA) regulations of the EMA are:

 3.1 The construction of facilities for any process or activities which requires a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).

- 3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.
- 3.3 Resource extraction, manipulation, conservation and related activities.

Therefore, for the approval of mineral exploration activities on the EPLs, the Proponent is required to submit an Environmental Assessment Report (EAR) and draft Environmental Management Plan (EMP) to the Department of Environmental Affairs and Forestry (DEAF) at Ministry of Environment, Forestry & Tourism (MEFT). Once the EAR and EMP have been evaluated, an ECC may then be issued or denied by the Environmental Commissioner. If issued, only then may the Proponent commence with prospecting and exploration activity.

To fulfil legal requirements, the Proponent has appointed Excel Dynamic Solutions (Pty) Ltd, an independent team of Environmental Consultants to conduct the required Environmental Assessment (EA) process and submit the ECC application to the Environmental Commissioner on their behalf.

#### 2 PURPOSE OF THIS DOCUMENT

It should be noted that this Background Information Document (BID) is not an EA Report but a non-technical summary of the EA, aimed for information purposes and a basis for public involvement from the beginning of the EA process. The motivation behind this document is to:

- briefly introduce the proposed project and related activities to potential interested and affected parties (I&APs)/stakeholders.
- give background information to I&APs of the task, along these lines giving a chance to them (I&APs) to get information, remark and raise issues with respect to the approval measure.
- invite members of the public to register as I&APs and added to the EA database so that they can stay informed about the EA progress throughout its process; and
- To provide all I&APs with an opportunity to comment or provide inputs/ concerns on the proposed project activities, which entails concerns/issues on the biophysical and socio-economic aspects, and any other issues of concern related to the proposed project. The information from I&APs will then form basis of the EA

and EMP documents that will help the regulatory and competent authorities (MEFT and Ministry of Mines & Energy (MME), respectively) to pass judgment on the acceptability of the undertaking.

#### 3 I&AP'S/STAKEHOLDERS

The I&APs or stakeholders of this proposed project are local communities, relevant government institutions and their representatives, concerned scientific organizations, environmental health organizations, non-governmental organizations and the public at large. These groups are encouraged to participate in the EA Public Participation process by means of public meetings and written correspondence.

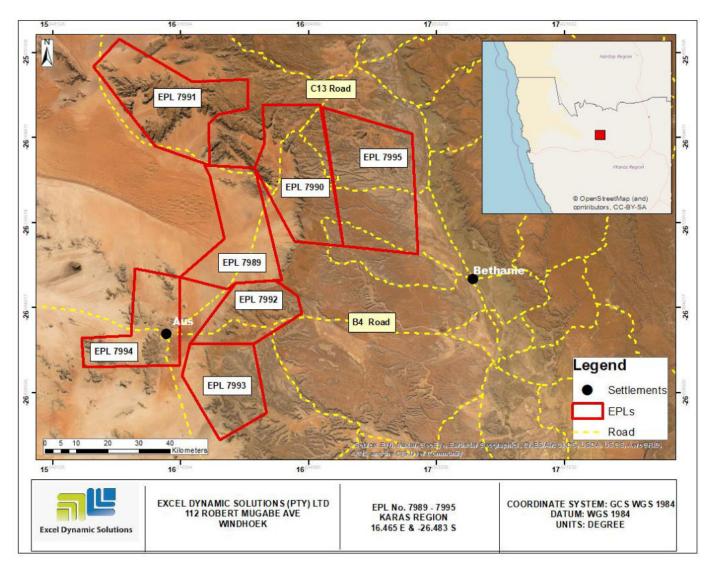


Figure 1: Location of the EPLs 7989-7995 in the ||Karas Region

#### 4 NEED AND DESIRABILTY OF PROPOSED ACTIVITY

As one of the largest contributors to the Namibian economy, mining contributes locally to the improvement of household level income and livelihoods. In Namibia, exploration for mining occurs mainly within the private sector, and holds great potential to contribute to the enhancement and development of other sectors. The mining sector forms the vital part of some of Namibia's development plans, such as the Vision 2030, National Development Plan 5 (NDP5) and Harambee Prosperity Plan (HPP), which renders mining essential to the development goals of Namibia by contributing to meet global demands for minerals, and to national prosperity. Successful exploration can lead to mining activities on the EPLs, which would feed into these development plans, and contribute to national Gross Domestic Product (GDP) and generation of foreign currency. This in turn, can support the aim of achieving a balance between the establishment and dissemination of wealth.

Partaking of local organisations/groups in the mining sector would enhance the already existing mining activities in the ||Karas Region, and provide employment opportunities to local residents of the region, as well as other economic opportunities that may not directly be related to mining activity.

#### 5 PROJECT DESCRIPTION

Upon issuance of an ECC, The Proponent prepares for prospecting and exploration works on the EPLs. The description of the project activities below will ease the identification of the potential impacts of the project on the environment, particularly the negative impacts, of which are the focus of the EA.

## 5.1 Project Inputs

The following inputs will be required in term of vehicles and equipment for the project:

- Vehicles: 4x4 trucks
- Earthmoving Equipment
- Compressor

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- BID: EPL 7989, 7990, 7991, 7992, 7993, 7994 & 7995
- Truck mounted drill rig and diesel-powered generator for Reverse Circulation (RC) drilling and Diamond drilling
- Oils, grease and drilling fluid (stored in manufacturers approved containers)
- Water bowser and diesel bowser (bunded).
- Accommodation for project personnel (staff): Personnel will be accommodated in temporary accommodation (tents) and/or home sourced casual labour. Vehicles and equipment will be stored at a designated area near the temporary accommodation.

In terms of services infrastructure and human resources, the following will be required:

 Water – ±2000 litres of water will be used monthly during exploration work, and ±100, 000 litres of water will be used in the cases of diamond drilling. These figures will be confirmed and validated during the scoping assessment. The water will be sourced from nearest boreholes on the farms covered by the EPLs, through water abstraction permits.

- Electricity The operations will use solar power and diesel generators for power supply.
- Personnel The project requires about 6 10 workers including a supervisor, driver, and driller. The exploration crew would include semi/unskilled labourers.
- Sanitation Long drop ablution facilities will be provided near prospecting and exploration site(s).
- Site access (road): The EPLs are accessible via the C13 Road, which passes through the EPLs north-eastwards from Aus Settlement.

#### 5.2 Project Processes

The proposed exploration activities (methods) are divided into the following categories:

- Desktop Study: The exploration program commences with a review of geological maps and historical drilling and / or exploration data for the area, if any.
- Non-invasive techniques: (a) Soil geochemistry, (b)
   Rock sampling, (c) mapping, (d) Ground and airborne geophysical surveys.

BID: EPL 7989, 7990, 7991, 7992, 7993, 7994 & 7995

 Invasive techniques: Reverse Circulation (RC) Drilling, and Diamond Drilling, trenching and pitting

— Detailed Exploration phase

These techniques/methods will be fully described in the EA Report.

Prior to commencement of any site work, all personnel (fully employed, contracted, and casual) will be inducted on the Proponent's Environmental, Health and Safety Policy as well as procedures and processes to follow while conducting the work.

Consultations with land owners and users, the community, and government stakeholders will be conducted to introduce the Proponent's intentions, explain the purpose and stage of the proposed exploration, and to determine the operating procedures and rules of the area, in order to develop land access and land use agreements with the responsible authorities.

#### 5.2.1 Duration: Prospecting and Exploration activities

Due to the iterative and phased nature of mineral exploration programmes, it is not possible at an early stage of exploration to give exact areas for future drilling or an exact duration of the exploration activities. Soil sampling programmes may last from one week to several months, or more than one year. Drilling programmes may initially range from two weeks to a month and upwards of a year, depending on the planned programme or based on the results of the programme. The Proponent undertakes to work with all relevant stakeholders to keep them informed of exploration progress to facilitate site visits and access to ongoing field exploration programme.

The Proponent has highlighted that in the event of ECC issuance, and depending on when the actual site works commence, the planned exploration activities are expected to last for about 3 years.

The planned mineralization model and exploration targets will be selected based on the local geology mapping, methods of exploration and assay results from collected samples. The aim of the planned prospecting and exploration activities is to delineate the mineral deposits and determine whether the deposits are economically feasible for mining.

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No processing of discovered commodities as part of the exploration work are planned for onsite during the exploration phase unless it progresses to the feasibility stage.

## 5.3 Decommissioning and Rehabilitation of the Site

The decommissioning of the explored sites and areas within the EPLs will be done to ensure that the disturbed areas are returned to their pre-exploration state as far as possible. The decommissioning referred to herein, includes the removal of all project related vehicles, equipment, structures, waste and services infrastructures from the site to designated areas (storage facilities and waste management facilities).

Rehabilitation of the disturbed site areas within the EPLs will include the levelling of topsoil that may have been stockpiled, and backfilling of exploration boreholes and trenches/pits. The Proponent will need to put exploration site rehabilitation measures in place, and these will be included in the project's draft EMP.

#### **5.4 Project Outputs**

The main project outputs are:

BID: EPL 7989, 7990, 7991, 7992, 7993, 7994 & 7995

- Solid waste general solid waste (food waste, plastic, paper, etc.) and exploration solid waste (used drill rig components, discard/waste rock samples etc.) generated by the prospecting and exploration activities.
- Liquid waste Wastewater will be transported to the nearest suitable local authority wastewater treatment facility, upon agreement with the Aus Village/Settlement Council. Fuel/oil spills will be discarded to the nearest approved and appropriate waste facility (upon reaching agreements with the facility operators/owners to dispose of such waste).
- Exploration samples These are usable soil and recovered rock samples for further analysis as part of exploration.

#### BID: EPL 7989, 7990, 7991, 7992, 7993, 7994 & 7995

#### 6 ENVIRONMENTAL ASSESSMENT PROCESS

The EA process is conducted according to the provisions laid out in the Environmental Management Act (No. 7 of 2007) and its' Environmental Impact Assessment Regulations (2012). The primary objective of the EA will be to identify potential negative impacts associated with the proposed activity, assess them and determine whether the areas are environmentally fit for exploration activity, and recommend practical and effective mitigation measures to be implemented by the Proponent in order to minimize these impacts. The expected duration of the EA process is three (3) months.

The main objectives of the EA are to:

- Comply with Namibia's Environmental Management Act (2007) and its EIA regulations (2012).
- Identify potential impacts associated with the proposed Activity.
- Inform I&APs and relevant authorities about the exploration activities and provide them with a reasonable opportunity to participate during the EA process.
- Assess the significance of issues and concerns raised.

- Compile a report addressing all identified issues and potential impacts related to various aspects of the activity.
- Compile an Environmental Management Plan (EMP) which includes impact mitigation measures.

The following steps are followed for this EA process:

- Step 1: Project initiation submission of the ECC application to the project competent authority (MME) and project registration on the MEFT online portal, development of stakeholders (I&APs) list and compilation of Background Information Document (BID).
- Step 2: Baseline assessment Literature and legal review (desktop study) of applicable data sources and impacts screening (scoping).
- Step 3: Ongoing Public Consultation and facilitation.
   This entails the pre-identification of and consultation with key stakeholders or I&APs. The placement of EA notification for two consecutive weeks in the two different newspapers as required by the EMA (in New Era and The Namibian).

- Step 4: Information sharing Circulation of the Background Information Document (BID) to pre-identified I&APs and members of the public who have indicated interest and requested for EA registration.
- Step 5: Site Visit / Assessment and Public Consultation Meeting - The public consultation meeting is scheduled to be held in Aus on 14 September 2021 at 11:00, at Marmer Primary School.
- Step 6: Reporting Compilation of the draft Environmental Assessment Report (EAR) & EMP and other relevant documents.
- Step 7: Public Review Circulating the draft EA report and EMP to the I&APs for review and comments.
- Step 8: Final Reporting and Submission Finalization of the EAR and Draft EMP and submission to the MEFT for evaluation and consideration of ECC issuance.
- Stage 9: Follow-Up with the Competent Authorities follow-up on EA report evaluation with the DEAF until such
  time that the ECC is issued and notify the I&APs of the
  MEFT's decision.

#### 6.1 Potential Impacts

The following potential impacts have been identified so far:

#### Positive:

- Potential for creation of temporary job positions for locals, especially the non-skilled labourers.
- Boost to local and regional economic development, i.e., economic diversification.
- May activate other investment opportunities in the Regions.
- Contribution to regional economic development.

## **Negative:**

- Potential health and safety risks associated with mishandling of exploration equipment (materials) as well as inadequate personal protective equipment.
- Potential impact on biodiversity (fauna and flora) on and around the site (EPLs).
- Potential soil and water pollution from accidental or mishandling of products such as hydrocarbons, drilling liquids and effluent utilized and handled on site.

BID: EPL 7989, 7990, 7991, 7992, 7993, 7994 & 7995

- Physical soil disturbance from invasive exploration techniques such as drilling and possible excavations related to exploration.
- Potential dust generation from exploration related activities such as drilling and vehicles traveling on unpaved roads may lead to the decrease in air quality of the area.
- Potential increase in noise levels to the neighboring communities from exploration vehicles and machinery through the area covered by the EPLs.
- Potential pressure on water resources through the abstraction of water for exploration related activities such as drilling.
- Potential impact on archaeological/heritage resources through inadvertent unearthing of such sites or objects that may be located below ground surface or project related disturbance of nearby archaeological sites or objects found in the vicinity of the EPLs.
- General environmental pollution through littering (general waste generated on the project site).

- Visual impact due to the presence of exploration heavy vehicles and related infrastructure, as well as landscape scars.
- Potential increase in vehicular traffic flow and slow-moving project vehicles such as trucks in the area, especially on access roads connecting the site area which might cause road accidents.

The EA process seeks to identify sensitive environmental (both biophysical and social) features that might be affected/impacted by the proposed exploration and related activities. The potential biophysical and social impacts listed above were pre-identified as part of the scoping study and may not be final (pending site visit and assessment). More potential impacts will be identified as the EA process progresses i.e. upon site visit and consultation with the public. All impacts and concerns/comments raised by the I&APs and the public at large will be incorporated and addressed in the Environmental Assessment Report.

A draft EMP will also be developed to mitigate the potential (adverse) impacts stemming from the proposed project activities to ensure environmental management and sustainability.

#### 6.2 Public Consultation

Public consultation is an important part of EA process. During the consultation process, interested or affected members of the public are given an opportunity to find out more about the activity and raise any issues or concerns pertaining to the environmental assessment and provide written feedback.

To comment or receive further information on the project, please register with Excel Dynamic Solutions (Pty) Ltd (contact details below) as an Interested and Affected Party (I&AP).

All registered I&APs will be kept informed throughout the various stages of the project and will be provided the opportunity to comment on the Scoping Report.

The comments, inputs, suggestions, issues, and concerns related to the proposed project activities should be submitted in writing either directly via email or using the Comments Form provided on the next two pages. Please feel free to attach an additional sheet to the Form, should the provided Form space be insufficient for your comments and or concerns.



# Africa Big Rhino Mining (Pty) Ltd

BID: EPL 7989, 7990, 7991, 7992, 7993, 7994 & 7995



Contact: Ms. Althea Brandt Tel: +264 61 259 530

Fax: +264 886 560 836 Email: public@edsnamibia.com

P O Box 997154, Maerua Mall, Windhoek

You are hereby invited to the Public Consultation Meeting scheduled as follows:

Date: Tuesday, 14 September 2021

Time: 11h00

**Venue: Marmer Primary School** 

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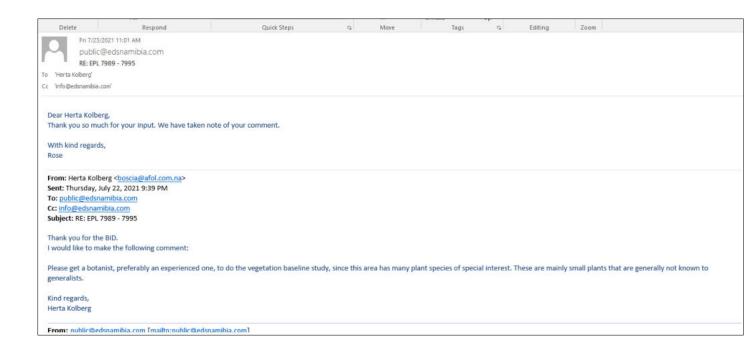
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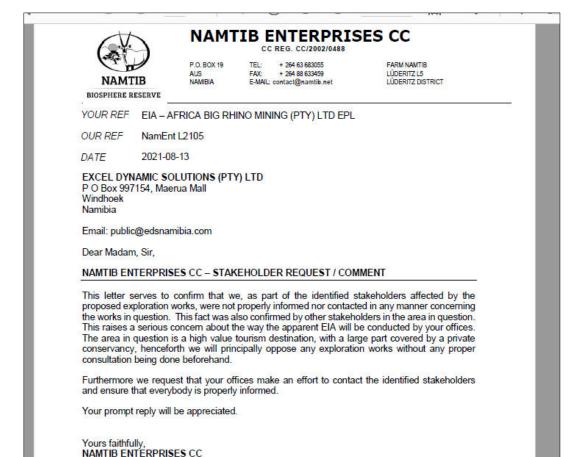
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N/a'an ku sā Wildlife Experience (Pty) Ltd VAT No.: 4574962-01-5 Reg No.: 2008/059 P.O. Box 99292, Windhoek, Namibia. T. 1-254 (10)61-228 859 Websites: www.naankusecollection.com. www.naankuse.com

16 August 2021

YOUR REF EIA - AFRICA BIG RHINO MINING (PTY) LTD EPL

EXCEL DYNAMIC SOLUTIONS (PTY) LTD

P O Box 997154, Maerua Mall Windhoek Namibia

Email: public@edsnamibia.com

#### RE: NAMTIB ENTERPRISES CC - STAKEHOLDER REQUEST / COMMENT

This letter serves to confirm that we, as part of the identified stakeholders affected by the proposed exploration works, were not properly informed nor contacted in any manner concerning the works in question. This fact was also confirmed by other stakeholders in the area in question. This raises a serious concern about the way the apparent EIA will be conducted by your offices. The area in question is a high value tourism destination, with a large part covered by a private conservancy, henceforth we will principally oppose any exploration works without any proper consultation being done beforehand.

Furthermore we request that your offices make an effort to contact the identified stakeholders and ensure that everybody is properly informed.

Your prompt reply will be appreciated.

Dr. Rudie van Vuuren



Thu 8/26/2021 4:12 PM Harald Marggraff < marggraff@iway.na>

EA on various EPL's NE of Aus Settlement area

o info@edsnambia.com; public@edsnambia.com

1 You replied to this message on 8/27/2021 8:45 AM.

#### Good day

Your registered letter dated 20 July 2021, has reference. Receipt of your letter is hereby acknowledged.

Mr Ludwig Schnebel, owner of the farm Gamochas – No 31 and Neisip – No 34. Mr Schnebel is a pensioner and requested me, his son in law, Harald Marggraff, to assist him in this regard.

We would like to be informed on the outcome of and recommendations of the EA to the Proponent regarding the impact of the mineral prospecting and exploration on the environment by the consultants.

Furthermore, a contract between the farm owner and the prospector is to be drafted by the consultant, as per Minerals Act (Prospecting and Mining Act, 1992). Such contract must clearly point out all the risks and impacts on the environment and how these are to be mitigated by the prospecting company, as well as the compensation to be paid to the landowner.

Awaiting your response, I remain with Kind regards

Harald Marggraff P.O. Box 11656 Klein Windhoek marggraff@iway.na 081 280 7228 (062) 549125



Tue 9/7/2021 6:12 PM

Herta Kolberg <br/> <br/>boscia@afol.com.na>

RE: Invitation: Public Consultation Meeting - EPLs 7989 - 7995

You replied to this message on 9/8/2021 8:43 AM,
 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Dear Rose,

I cannot use your form in the BID and would therefore like to make a comment through this route.

A proper, on-site flora assessment needs to be done for the EIA, not just a desktop study, since this area contains a number of plants of conservation concern. A specialist botanist should do this since these are species that are often unknown or cannot be easily identified by a non-specialist. Other plant-related issues of which usually only botanists are aware, such as for instance plant poaching, may also be relevant here, thus necessitating the involvement of such a specialist.

Kind regards, Herta Kolberg



#### **Herta Kolberg Botanical Consulting**

Botanist

P.O. Box 97424 Moeruo Porb Windhoeb NAMIBIA

Tels +264 - 61 - 220701 +264 - 81 - 2564156 <u>boscia@afol</u>



#### Klein-Aus Investments cc

PO Box 25 • Aus • Namibia • Tel: +264 – 063 – 258 116 • Fax: 088623302

E-mail: <a href="mailto:christine@klein-aus-vista.com">christine@klein-aus-vista.com</a>; <a href="mailto:info@klein-aus-vista.com">info@klein-aus-vista.com</a>; <a href="mai

To: Excel Dynamic Solutions (Pty) Ltd. Windhoek

Re: Africa Big Rhino Mining (Pty) Ltd Bid: EPL 7989, 7990, 7991, 7992, 7993, 7994, 7995

We hereby wish to register as an Interested and Affected Party for the above mentioned EA process.

We wish to raise the following questions and concerns:

- 1. We request more information on the named company Africa Big Rhino Mining (Pty) Ltd, as there seems to be no satisfying information available on the internet. What type of company? Who are the shareholders? Is it Namibian-owned or foreign?
- If the company is not Namibian-owned, what are the benefits for Namibia and its people?
- Why has this area been earmarked for prospecting? What does the company hope to find? (the provided document is rather vague)
- 4. We expect to receive a copy of the respective ECC's.
- Please note that most of the proposed exploration zones are falling into sensitive habitats as part of Succulent Karoo Biodiversity hotspot and should thus not be deemed suitable at all for such invasive economic activities.
- There is a large number of endemic plant and fauna species in the proposed area which deserve utmost protection and conservation.
- 7. Water is a very scarce and precious resource in the proposed area and is barely enough for the current farming and tourism activities. Does the company have any plan and background information regarding this dire situation? Does it want to truck in water? Just mentioning in the document that "water will be sourced from nearest boreholes on the farms" seems rather ignorant. If there is not enough water, what

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PO Box 25 - Aus - Namibia Tel: 063 - 258 116 - Fax: 088623302 Email: info@klein-aus-vista.com VAT Reg No: 08356893 - 01 - 5

then? Must the landowner and his/her employees and animals or tourists then go thirsty? And what about the few trees in the desert? If water is extracted at an unsustainable rate, trees will die. Especially the old flagship tree species such as Camelthorn are not replaceable.

- There are further several valuable archaeological and historical features in the area which might be at risk of destruction with such proposed activities.
- 9. Exploration & potential mining activities on private land are in direct conflict with already existing land uses, especially with tourism. Tourism is a significant economic contributor in these less developed areas and offers many job opportunities for local residents (especially in the light of re-occurring droughts and sensitive desert environments which makes self-sufficient farming difficult). Tourism has taken a large hit by Covid-19, but is still a very important economic factor and the lifeline of many local people. Tourists come to the South of Namibia to enjoy the pristine nature, especially the desert, mountain ranges and inselberg landscapes and will not tolerate noise, dust and industrial activities. Thus, there is a significant risk of losing visitors and income and jobs as a result of such activities. The increased truck and train traffic is already a negative factor, commented upon by visitors.
- 10. From the document, it does not become clear how dust and noise pollution would be mitigated in any acceptable way? Please elaborate
- 11. It seems impossible to not make new tracks, roads, holes, damages to existing structures, damages to rocks and mountain areas. It further seems ridiculous to mention that disturbed areas are returned to their pre-exploration state as far as possible. This is not good enough, as the desert and rocks/ mountains cannot be rehabilitated satisfactorily. The sensitive and many endemic flora cannot just be replanted and will most likely be lost forever. Further on, previous "rehabilitation" practice in Namibia has not turned out very convincingly, there are many examples of non-satisfactory "rehabilitation" sites and companies so far got away with bad practice.
- 12. The mentioned contribution to regional economic development with stating 10 available jobs seem like a tasteless comment, as it appears unlikely that any local untrained and jobless individuals will benefit from this in any way. What are thus the proposed economic benefits for the region? It was further mentioned that no processing will happen locally, which means that all products are exported. This leaves the area destroyed and without obvious direct benefits? Please elaborate.
- 13. What are the rights of the landowners with respect to conflicting land uses? What counts more the existing rather sustainable land-use activities and noteworthy contributions to the Namibian economy or destructive exploitation of non-renewable resources in very sensitive habitats?
- 14. Local guesthouses, hotels, lodges are benefiting from domestic and overseas tourists and are more than likely not interested in long-term accommodation deals with mining and exploration employees as they are a totally different clientele and do not necessarily fit in with tourists at the same location. Thus, we do not see an economic benefit here either.
- 15. What about traffic? The area and local infrastructure are already suffering under the pressure of increased truck traffic to the LRZ port, not to mention the increased noise pollution. Any detailed plans and information available here?
- 16. There is a lot of wind in the proposed areas. Thus, dust and littering are a major concern. Who is going to control that on a daily basis and how?

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### APPENDIX H: RESPONSES FROM THE PUBLIC

- 17. Many landowners and their employees in the area are dependent on either farming or tourism activities. How will they be remunerated for any disturbance and direct loss of income due to proposed activities?
- 18. Farming and tourism activities usually go hand in hand with wildlife conservation and also sustainable management and utilization of such resources. Many farms/conservancies are protecting their wildlife resources effectively. Wildlife is sensitive to any changes in their environment. Wildlife resources in Namibia are already at high risk and have decreased tremendously over the last decades due to habitat loss. Any input regarding this matter? Any plan how to avoid negative impacts on wildlife?
- 19. If any exploration or mining should not be avoidable, we are not in favour of any exploration or mining employees staying on private land. And long-drop ablution facilities would not be tolerated. This is a health risk. Any human waste must be completely removed from the areas. In the light of an overall effort to minimizing negative environmental impacts, diesel generators should be out of the question.
- 20. We did not pick up any mentioning of social benefits for the local population? Any company in this area has a social responsibility. Any company worth its salt should have sustainable socio-economic development on its agenda and at heart. What investments are envisaged? What long-term involvement and social investment is planned? This is already important at an exploration stage.
- 21. We also did not pick up any mentioning of an environmental balance sheet. If you wish to take away on one side, you should have the need to add and contribute somewhere else. For example planting native trees, relocation of sensitive species, investment into water recycling, providing firewood to residents in need... What is the plan in this respect?
- 22. Overall, the presented Background Information Document leaves a lot to be desired and the meeting between EDS and affected parties in Aus on 14<sup>th</sup> September 2021 raised more questions than provided clear answers. The presentation by EDS was vague in many points and detailed questions could not be answered satisfactorily. When will detailed information be available for everybody?

We appreciate the detailed and objective response to our questions and explicit elaboration on raised concerns. We feel, there is not enough in-depth information provided so far to the affected parties.

At the current information status, the whole proposal seems to harbour more negative aspects than any positive outcomes for the affected parties and the environment.

We understand, EDS is in the difficult position to deal with "both sides of the coin", but is first and foremost representing a client's proposal. The client is presumably unconcerned about heritage, sense of place and nature conservation and is interested in pure economic gain for the specific company.

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Tel: 083 - 258 116 - F3x: 0386 23302

Email: info@klein-aus-vista.om

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### APPENDIX H: RESPONSES FROM THE PUBLIC

Thus, we urge EDS (as a Namibian company which should have an interest in preserving cur vulnerable, but rather special country and very base of our existence) to consider all concerns and questions carefully and *objectively*.

People in this area are deeply rooted here. Yes, people here need jobs and food on the table, but development should be in a sustainable way and should not be to the disadvantage of the environment and already existing economic activities.

Yes, our area is a structurally less developed area, but maybe with a reason.

Exploration and mining in sensitive environments such as ours do not appear as a valuable contribution to sustainable economic development.

Especially in the light of minimal gain for the public individual and target-oriented gain for only one specific company?

Expecting your reply and more information soonest,

Christine Swiegers

Aus, the 16th September 2021

Petrus Reichert Swiegers

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Tel: 063 - 258 116 - Fax: 088623302
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VAT Reg No: 08356893 - 01 - 5

Excel Dynamic Solutions (Pty) Ltd PO Box 997154, Maerua Mall

Windhoek Namibia

Email: info@edsnamibia.com

MINUTES FOR PUBLIC CONSULTATION MEETING:

**ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED MINERAL** 

EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSES (EPLs)

7898, 7990, 7991, 7992, 7993, 7994 & 7995 IN THE AUS AREA

Date: Tuesday, 14 September 2021

**Time:** 11H 20

**Venue:** Marmer Primary School, Aus, //Karas region

The Public Consultation Meeting was attended by thirty-two (32) Interested and Affected

Parties, including three Environmental Consultants from Excel Dynamic Solutions (Pty)

Ltd (EDS) - Please refer to the attached attendance register. The distinct

representatives that attended the Meeting are as follows:

Teachers from Marmer Primary School

Members of the Aus Community (Farmers, Residents, and others)

• Three Environmental Consultants from Excel Dynamic Solutions

**COVID-19 REGULATIONS ADHERENCE** 

Upon arrival at the Community Hall entrance, all COVID-19 Health Regulations protocol

were adhered to from the procession of the meeting. Hand sanitizer was provided at

entrance and meeting seats were arranged to observe social distancing. The attendees

were also requested to keep their facemasks on throughout the meeting.

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Windhoek Namibia

Email: info@edsnamibia.com

INTERPRETATIONS OF LANGUAGES (ENGLISH AND TRANSLATION OR

AFRIKAANS)

Afrikaans is the most widely spoken language in Aus area. Thus among the attendees,

Mr. Vincent T. Eiseb (A teacher at Marmers Primary School) helped with translation of

few answers to different questions. This was to ensure effective communication in the

meeting, and that all comments and other inputs presented in the local language were

recorded in the minutes for consideration in the ESA Report.

INTRODUCTION AND WELCOMING REMARKS

Mr Nerson Tjelos introduced himself and the EDS team present at the meeting. He later

expressed gratitude to everyone in attendance for making time to attend the meeting. Mr.

Tjelos briefly introduced the project and clarified the objectives of the project, and further

explained why the IAPs were invited about and why they were invited (with reference to

the Environmental Management Act (EMA) No. 7 of 2007 and its 2012 Environmental

Impact Assessment (EIA) Regulations on Public Consultation).

MEETING AGENDA AND PRESENTATION

Mr. Tjelos presented the agenda of the meeting, which included the following items:

Introduction and welcoming

EPLs information and Location

Description of the Project

The Main Legal Framework & ESA/EIA process

Preliminary potential impacts identified- positive and negative

Stakeholder questions, concerns and comments

**Concluding remarks** 

Excel Dynamic Solutions (Pty) Ltd PO Box 997154, Maerua Mall Windhoek Namibia

Email: info@edsnamibia.com

### 2.1 Explanation of what an ESA is, its Process and the Public Role in the Process

Mr. Tjelos explained the purpose of an ESA and presented the proposed exploration activities (where explorations will be taking place, what commodities will be explored for and their methodology briefly). Clarification was also provided regarding which EPLs (EPL 7989-7993 and 7995) were granted to the Proponent by Ministry of Mines and Energy, and which EPL (EPL 7994) is still an application.

.Additionally, Mr. Tjelos presented the pre-identified potential positive and negative environmental and social impacts of the project.

## 2.4 Public Open Discussion (Interactive Session)

The meeting attendees were presented with an opportunity to raise their concerns/issues and or comment on the proposed project activities.

The issues and comments recorded are presented in **Table 1** below.

Table 1: Comments and issues raised during the public meeting in Aus on the 14 September 2021

Comment/ issue No.	Issue / comment / question	Response and name of responder:
1	Rehabilitation issue:	Nerson Tjelos:  The proponent/ owner of the licenses is responsible for the rehabilitating the explored area.

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Email: info@edsnamibia.com

Since the exploration activities are taking place on private farms area, and after the exploration has taken place and no valuable resources have been found, what happens next?

Can there be/ Is there a rehabilitation fund that is set by the proponent before exploration?

# **Nerson Tjelos:**

The Environmental ACT and the Mineral Right ACT are under review and rehabilitation components are to be incorporated. As for now, it is only when the proponent needs to renew license their where the stakeholders can have their concerns/complains are greatly taken into consideration.

The license is only valid for 3 years and if there are complaints from affected stakeholders, license а renewal might not be awarded.

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Email: info@edsnamibia.com

2	Status of work at those	Nerson Tjelos:
	sites  Can you please establish the status of the work at the EPL sites?	As at this point, no
3	(Refusal of entry by the farm owner)  Can the farm owner deny the proponent access to their farm/property?  What will happen if the farm owner refuses the proponent to enter his/ her farm	
a4	Does one needs to consult the community/ Public before applying for an EPL or a Mining claim (MC):	Nerson Tjelos: For a mining claim, the proponent should attain a consent letter from the farm/ land owners before the actual application

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5

For EPL application, the proponent will only consult the public/ interested party after it has been granted for them to obtain Environmental Clearance Certificate

# Impact of mining on tourism activity:

How can the tourist accommodation facilities protect themselves from the outcomes of the exploration activity (dust, noise, land pollution)?

# **Nerson Tjelos**:

It is advisable that the affected parties further raise with their concerns the Ministry of Environment, Forestry and Tourism. In the event that the comments provided raise concerns to the Ministry, officials will be allocated to assess magnitude of the situation so that an informed decision can be made.

The EMP will stated guidelines to be adhered to, and an onsite environmentalist should be present during operations.

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6	Impact on fauna and flora::  What is the impact of mining on biodiversity especially in environmental sensitive areas (where there are for example endemic species)?	Nerson Tjelos:  The extent of impact depends on the assessment report from the consultant and the final decision will be made by MEFT whether to grant an Environmental Clearance
7	How many EPLs were granted the ECC	Certificate or not.  Nerson Tjelos;  No ECC has been granted yet. The EPLs are 7 in total, with 1 (EPL 7994) with a pending application.
	Comment,  For efficiency of notices to farmers, a new mode of communication should be employed as Aus does not receive the New Era Newspaper in future,	Recommendation noted.

# FINAL REMARKS AND CONCLUSION OF THE MEETING

Excel Dynamic Solutions (Pty) Ltd PO Box 997154, Maerua Mall Windhoek

Namibia

Email: info@edsnamibia.com

Mr. Tjelos concluded the meeting by thanking the attendees for making time for the meeting, matured engagement and crucial input through comments and raising their concerns. He indicated to the attendees that all their comments, concerns and inputs had been noted down for consideration and addressing in the Environmental Scoping Assessment (ESA) Report as well as incorporating their recommendations into the draft EMP.

He further informed the attendees that there is still an opportunity after the meeting (two weeks) to submit further questions/ comments for incorporation into the draft ESA Report. He also informed them that the draft Report together with the meeting minutes will be shared with them for review and further comments prior to finalizing the ESA Report and its submission to the Ministry of Environment, Forestry, and Tourism for consideration of an ECC.

The meeting was adjourned at 12:40

# Public Meeting Attendance Register

PROJECT: ENVIRONMENTAL ASSESSMENT (EA) FOR EXCLUSIVE PROSPECTING LICENSES (EPLs) No. 7989 – 7995 LOCATED NORTHEAST OF AUS IN THE ||KHARAS REGION, NAMIBIA

Marmer Primary School Venue:

Tuesday, 14 September 2021 Date:

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