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PUBLIC AND FOCUS GROUP MEETINGS AND RELATED FEEDBACK

SANDPIPER MARINE PHOSPHATE PROJECT, ERONGO REGION, NAMIBIA



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NAMIBIA MARINE PHOSPHATE (PTY) LTD

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1 SUMMARY OF PUBLIC MEETINGS AND COMMENTS FROM I&APS

1.1 Introduction

Environmental Compliance Consultancy (ECC) has been engaged by Namibia Marine Phosphate (Pty) Ltd, the Proponent, to conduct an Environmental Impact Assessment (EIA) in accordance with the Environmental Management Act, No. 7 of 2007 and its regulations of 2012, for which an application for an environmental clearance certificate will be submitted for the mining project activities on ML 170, offshore, Namibia.

The proposed 'Sandpiper Marine Phosphate' Project intends to develop economically viable marine phosphate deposits found on ML 170 using the services of an international dredging company with experience in the application of deep-water dredging techniques. For this purpose, public and stakeholder meetings were scheduled and conducted in Windhoek and Walvis Bay on the 9th and 11th February 2022 respectively, to ensure that the public and key stakeholders are engaged in the early stages of the ESIA.

For the public meetings, local and community union representatives, directly affected parties, as well as local, regional and national authorities were identified and issued with invitations to attend. Notices advertising the public meetings were also published in local newspapers and media. All attendees at the public meetings were recorded and registered, as interested and affected parties (I&APs). A summary of the public meeting's feedback will be issued to the relevant stakeholders, registered I&APs and competent authorities being the Ministry of Mine and Energy (MME), Ministry of Fisheries and Marine Resources (MFMR) and the Ministry of Environment, Forestry and Tourism (MEFT) to accompany the application for an environmental clearance certificate, for a record of decision (RoD) to be made.

1.2 PUBLIC MEETINGS SUMMARY

The public meetings were facilitated by Jessica Bezuidenhout, Principal Practitioner, – Environmental Compliance Consultancy (ECC) with technical support from Mr Mike Woodborne from NMP. The welcoming and agenda of the meetings included an introduction to ECC as an independent environmental consulting company commissioned by the Proponent NMP as the environmental assessment practitioner (EAP) to conduct the environmental impact assessment and apply for an environmental clearance certificate for the proposed offshore marine phosphate mining activities on Mining License ML170.

As part of the Project's introduction to the public, the Project's location, baseline and ESIA process, and procedures were presented by Jessica Bezuidenhout. An explanation of the Project's current status including a summary of the previous environmental assessment processes completed and the outcome of legal actions was also provided as background leading into the current application process and public meetings held. It was emphasized that



the objective of the current public scoping meeting conducted in the early scoping phase is to engage all stakeholders and to identify further potential studies and assessments that may be required for inclusion in the environmental impact assessment of the Project.

The technical presentation by NMP then provided an overview of the proposed operations on ML170 for which the environmental clearance certificate is required, as well as the overall project including:

- NMP company structure and project milestones
- Phosphate and its useful applications
- Intended products, target markets and geopolitical advantage of Namibia
- Identified mineral resources and ore reserves of the Sandpiper Project
- Outline of the simple phosphate ore beneficiation process and final product
- Scale of proposed annual (<0.1% of ML170 area) and 20 year (<2% of ML170 dredging operations in ML170
- ML170 dredging equipment and process description
- Non-continuous dredging cycle (transit, dredging, transit, offloading) duration (14-16 hours actual dredge time per cycle) and frequency (approx. 3 cycles per week).
- Prospective general sites for a land-based processing plant and beneficiation operations.
- Project permitting stages for the marine operations on ML170 as the requirement to proceed to permitting and development of the land-based component of the overall project

The presentation from ECC covered a detailed description of the public consultation purpose and intentions as part of the environmental and social impact assessment (ESIA) process for the marine operations in ML170. At this stage, I&APs were encouraged and informed of the importance of raising any concerns and comments related to the proposed operations on ML170, which are to be considered in the ESIA studies and submitted along with the application for an environmental clearance certificate to the competent authorities and MEFT for a record of decision.

The main components of the environmental assessment identified for consideration in the ESIA were discussed, such as, aspects and concerns raised about the impacts of seabed mining on the marine biodiversity and ecosystem functioning and how mitigation and monitoring measures will be enforced, which will form an important part of the impact study for the proposed Project. The current phase aims to involve and engage I&APs to develop target-specific Terms of References (TOR) for necessary specialist studies required to address all identified concerns and potential impacts in the assessment report.



1.3 KEY FEEDBACK ON ISSUES OF CONCERN – PUBLIC MEETINGS

The pool of comments received from all meetings held were provided by key stakeholders, representatives of the community and industry such as; the Confederation of Namibian Fishing Associations, Ocean Conservation Namibia. These groups of I&APs presented useful and valuable input into the ESIA through the points and comments raised during the various meetings. From the review of the recorded statements, the key common themes of concern that were raised can be summarised in the following categories:

1.3.1 IMPACTS ON THE BIODIVERSITY OF THE AREA AND MARINE ECOSYSTEM

In open discussion, concerns were voiced in regard to:

- The effects of sediment plume dispersion and the effects it may have on marine life and the marine ecosystem,
- The effects of underwater noise from operations on mammals and
- The release of heavy metals through the generation of plumes and its influence on marine life.
- Regarding these concerns, the Proponent advised of recent supplementary studies completed in 2020 including: a specialist study conducted by UK based group HR Wallingford on ocean currents and sediment plume dispersion modelling to determine the potential footprint of the sediment plume for single, annual and 20 year cumulative dredging operations.
- Sediment toxicity study to supplement the existing studies of heavy metals, toxicity, elutriation, the potential of suspended and dissolved heavy metals in the water column and possible ingestion of particulates of sediments and their impacts on organisms in the benthos. It was also noted that previous work included modelling of potential ecosystem impacts and related assessments.

It was further noted that the operational process and seabed impacts of the proposed seabed phosphate mining activities, being effectively a dredging operation is not that much different from the large-scale seabed diamond mining which is also effectively a dredging operation that is already taking place in Namibia. Marine diamond mining operations have been taking place sustainably for over 30 years and have had no significant negative impacts on the environment reported to date. The proposed Sandpiper Marine Phosphate Project operations are by comparison of a significantly smaller scale.



1.3.2 How will NMP ensure that effective monitoring takes place and mitigation measures are adequately implemented

Concerns were raised about how the Project operations and related impacts would be monitored and how the Proponent would ensure that appropriate mitigation measures were undertaken where possible to ensure that the negative impacts from their operations would be minimised.

There was a recommendation made from the floor that a multidisciplinary entity could be established to review the environmental performance of the company and its Project.

In this regard, it was noted that:

- The Namibian government has put in place comprehensive environmental legislation to
 ensure compliance in regard to monitoring and enforcement of committed mitigation
 measures and compliance with the legally binding environmental management plan
 (EMP) approved for the Project. The EMP is effectively what puts forth the level of
 monitoring the Proponent commits to on the operation and additional conditions
 included by the Environmental Commissioner should environmental clearance be
 granted.
- The Proponent is committed to operating within the best practice standards and principles of the industry and law.
- 1.3.3 What is being done differently this time compared to the previous EIA and how ECC would remain independent when conducting the ESIA

Queries were raised relating to understanding of the need for a new environmental impact assessment from the one already conducted in 2012 and 2014 and how the current EIA process would be conducted differently from that which was carried out previously. Will it be conducted without influence from the proponent?

Response: ECC noted that it retains its professional integrity, our client is the people and the environment. ECC always takes an unbiased approach and that is why public consultations with the government, private and public sectors are so vital, to capture what are the concerns so that we can assess them accurately. ECC also has no cut-off date for receiving public comments. MEFT then receives all comments and reviews our work.

ECC advised further that the significant body of specialist environmental information produced through the comprehensive set of assessments completed under the previous EIA process remains valid and will be utilised in this current assessment. However, the key difference this time will be to focus on the concerns



of the general public and also to follow all of the correct procedures in gathering all comments to make sure that these are adequately captured in their scoping report so that the impact assessment is a true reflection of the process followed. In addition, the current ESIA will include additional information from new specialist studies that were done subsequent to the previous EIA.

1.3.4 SOCIO-FCONOMIC BENEFITS

Queries were raised relating to how and when this project would economically benefit Namibians and many expressed their despair about the current economic situation in Namibia, especially in Walvis Bay.

Response: It was noted that while the proposed development of the Sandpiper Project is projected to have significant social and economic benefits both locally, regionally, and nationally, the timing and continued development of the project is dependent on receiving firstly the required environmental permitting for the proposed marine operations on ML170. Thereafter the project will be able to progress to the necessary site allocation and environmental permitting for the land-based processing plant and product handling facilities. Thereafter the marine mining operations can only commence once the construction phase of the land-based facilities has been completed. These two components of the Sandpiper Project must be completed in succession in order to ensure security of tenure of the mining licences as a requirement for funding the capital investment for construction of the land-based beneficiation plant. Once completed the mining project is projected to have significant benefits for both the local and national economies. Taxes will be paid to the government through royalties, thus contributing to the economy. The national FISCUS earns over and above company profits, through royalties and PAYE from every employee employed by the Project hence contributing to the country's GDP.

There will also be significant skill transfer to locals. The original environmental clearance certificate issued in 2016, required NMP to assist in building the skillset and education of the environmental capacity of the Ministry of Environment, Forestry and Tourism. In this regard it was noted that NMP has in the past since 2011 contributed significantly to funding academic studies of students from UNAM to promote academic progress and enhancing the knowledge base available in the marine space and intends to continue doing so.



2 SUMMARY OF FOCUS GROUP MEETINGS AND COMMENTS

2.1 Introduction

Prior to the announcement of the environmental clearance certificate application for the Sandpiper Marine Phosphate Project, in January 2022, key stakeholders including government agencies, NGO's, Associations, and companies were identified and issued with a courtesy letter from the EAP advising:

- 1) The intended registration of the environmental clearance certificate application and public meetings for the Sandpiper Marine Phosphate Project
- 2) That they had been identified as an interested and affected party and or stakeholder in relation to the proposed project and that the EAP would like to engage with them in relation to the proposed project
- 3) To inform and invite their attendance to the public meetings and to engage with the EAP and the proponent to be further informed
- 4) Advising of the intended dates for the public meetings in Walvis Bay and Windhoek and the importance of registering and participating as an I&AP

A further set of advisory letters were sent to identified I&AP's and/or stakeholders in February 2022.

The full list of entities that were issued with letters both prior to and after the advertisement of the application is provided in APPENDIX A — Stakeholder PRE-consultation Engagement Invitation

Responses were received from some of the parties, which entailed requests to either register as an I&AP or in some cases requests for a focus group meeting.

2.2 MEETING WITH WALVIS BAY SALTWORKS

At their request and in response to the courtesy I&AP/Stakeholder letter that was issued, ECC arranged and held a meeting with the executive management team of Walvis Bay Saltworks to present details of the proposed operations in ML170 for the Sandpiper Project and the ESIA and environmental clearance certificate application process. The meeting was held at the WBSW offices in Walvis Bay on the 4th of February 2022.

The minutes of this meeting is provided in Table 1 and provide details of the key contents of the meeting discussion and concerns raised by WBSW for consideration in the ESIA process.



2.3 MEETING WITH MFMR

At their request and in response to the courtesy I&AP/Stakeholder letter that was issued, ECC arranged and held a meeting with representatives of the Ministry of Fisheries and Marine Resources (MFMR) to present details of the proposed operations in ML170 for the Sandpiper Project and the ESIA and environmental clearance certificate application process. The meeting was held at the MFMR offices in Swakopmund on 11th March 2022.

The minutes of this meeting is provided in Table 3 and provide details the key contents of the meeting discussion and concerns raised by MFMR for consideration in the ESIA process.



3 ACKNOWLEDGEMENTS

In closing of all meetings ECC thanked all I&APs for their attendance and for providing valuable feedback during the public and stakeholder meetings. Through the public meeting process the Proponent and ECC have endeavoured to provide a platform to hear and address all relevant comments put forward by I&APs.

ECC further endorsed the fact that constructive feedback from I&APs results in a more robust and improved ESIA. This process results in a project that is understood by the community and I&APs. The I&AP's feedback will contribute to identifying the potential impacts to be assessed and concerns to be considered and addressed as the project progresses.

3.1 DETAILED COMMENTS AND RESPONSES FROM PUBLIC CONSULTATION MEETINGS

The official public consultation period began on the 23rd of December 2021 and remained open until the 25th of February 2022 for initial comments. These were received during focus group meetings, public meetings, via email and telephone which are to be included in the Scoping Report. These comments and their respective responses are included in the tables below.

Further comments are welcome after that date and the public consultation period will remain open for I&APs until the final assessment report for the project is ready for submission to the competent authorities.



Table 1 - Comments and feedback from pre-consultation engagement with Walvis Bay Salt holdings

	Stakeholder Engagement with Walvis Bay Saltworks Holdings Friday 4th February 2022 Zoom Meeting				
Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
Klaus Friedlingsdorf	WBSH	 Is the dispersion model concluding that there is no risk of any suspended solids reaching the intake of our saltworks? Is there any risk of heavy metals reaching the intake of our seawater? Will there be any bioaccumulation of heavy metals in the form of plankton that floats down to our intake because our oysters feed on plankton so it will end up in the oysters and the brine? 	 potential toxicity impacts related to heavy metals will be fully assessed in the current ESIA process. The specialist studies in those particular areas of concern have been completed most recently in 2020 and previously in the 2012 and 2014 detailed EIA verification documents and external peer reviews which address those concerns, particularly pertaining to; 		



Stakeholder Engagement with Walvis Bay Saltworks Holdings Friday 4th February 2022 Zoom Meeting

Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
			of exposure in regard to water quality or mariculture operations in relation at the site of Walvis Bay Saltworks
Andre Snyman	WBSH	There was a time when our oyster operations were not operational and stopped and I would just like to double-check that the potential impact on our oyster operation was fully considered and understood because the oysters have become an important component of our system in terms of a biological filter and that is something we need to confirm that at the time of study that our oysters were operational and the impact on the oysters was taken into consideration.	
Klaus Friedlingsdorf	WBSH	If there is any showstopper hindering NMP from setting up their land-based operations in and around the bulk terminal and the disposal near the airport, would you still consider your initial land base operations south of our salt works as an alternative or is that completely off the books?	



Table 2 - Comments and feedback from the Windhoek public meeting

Table 2 - Comments and feedback from the Windhoek public meeting					
	Wednesday, 9 th February 2022, 18h30				
		Address: 110 Robert Mugabe Avenue	, Windhoek		
		Scientific Society			
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION		
Governance					
Frank Steffen	Editor of Allgemeine Zeitung	1. After previous altercations/disagreements have you met with any of the other marine users, what are the developments? Do they agree with what you do now?	1. There has been an ongoing process through a public and stakeholder consultation process, which has been ongoing since 2011. To date, there have been roughly 18 consultations with various stakeholders and the public including the fishing industry, Ministries and public stakeholder working groups leading up to this phase. More recently, the government started developing the draft marine spatial plan and since 2018 NMP has been engaging stakeholders in the development of a central marine spatial plan, which is effectively a mechanism by which the government can manage all the activities in the marine environment including: fishing, mining, defence, tourism etc. This will allow them to identify where there are potential overlap zones, allocate where there are specific areas of priority for specific activities and set down ground rules to minimise and eliminate conflict between industries.		



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	Scientific Society				
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION		
		2. One of the biggest concerns of the public is mitigation. The public does not seem to have much trust in mitigation being governed by our government or the power that be. What are you committing to on your own, what will you do to make sure there is minimal impact?	The draft Marine spatial plan has been put out for stakeholder comments and the process is being managed by MFMR and is running in parallel with the drafting of the Blue Economy Policy which is the is intended to drive the future development of Namibia's blue economy. 2. The government of Namibia has put in place good environmental management legislation, which is acknowledged as being one of the best environmental legislations currently in place internationally. This legislation has operated quite effectively in mitigation and governance of the marine diamond mining industry enabling it to operate quite effectively, without any reported impacts on the marine environment. The operation proposed by NMP is a standard dredging operation that has been managed and monitored already on many occasions through government agencies reporting to MEFT for developments such as Namport harbour expansion. As far as monitoring and mitigation the Namibian government has put in		



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NAME	STAKEHOLDER	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
	DETAILS		
			place adequate and proper legislation. In relation to the proposed
			project, the environmental monitoring, mitigation and
			management actions are captured in the environmental
			management plan (EMP) which must be approved by the
			Environmental Commissioner.
			What is not well understood is that the EMP is a legally binding
			document.
			docament.
			Where there are any breaches in the defined activities of the EMP,
			it permits the government to implement its powers to either
			suspend or terminate operations. Every three years the law
			requires that the clearance certificate has to be renewed, and can
			only be renewed if the proponent has complied with the
			provisions of their EMP.
		3. How does this peer assessment work	
		considering there has never been phosphate	3. Because marine phosphate mining is often presented as
		mining done offshore before?	something that has "never been done before" there is a bit of
			clouding of the facts as the proposed operation is fundamentally
			a dredging operation which is an operation that has been done in



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	STAKEHOLDER	Scientific Socie COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
NAME	DETAILS		
			many places in the world.
			The project proposes using a standard dredger and a standard
			trailing arm dredging technique.
			Therefore, when it comes to peer review, we look at what marine
			operations are peer-reviewing the impacts of dredging, dredge
			spill and the environmental removal of sediment. Many studies
			and assessments have been done in the North Sea where
			aggregate mining, beach reclamation, and land protection
			dredging, which is also the trawling grounds for the North Sea.
			So, there is a wealth of information and experience on the
			impacts and environmental management of seabed dredging
			operations.
			When it comes to the land-based operations the peer review will
			happen as part of the EIA process and will be based on the
			activities and what the impacts will be on the immediate
			surroundings.



	Wednesday, 9 th February 2022, 18h30			
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		Scientific Society	I	
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION	
Gabriel Erastus	Economist	How can we trust ECC as the independent consultants since you are contracted by the client? Do you have someone from the MEFT as part of this assessment as symmetry, to make sure that the negative impacts are also fairly reported?	environment. Unbiased and that is why we do public consultations, to capture what are the concerns so that we can	
Operational Pro	ocesses			
Frank Steffen	Editor of Allgemeine Zeitung	1. If we look at the waste of the project, what is the ratio of waste compared to what will be taken out and used (what is used and what is disposed of)?	1. Approximately 60-70% component of everything that is recovered from the seabed is turned into a product, A fraction of the fine material is removed during the initial dredging process and the remainder is removed in the onshore screening process. The sand fraction is retained and is comprised of grains or pellets of phosphorite.	
		2. How many cycles per week, month or year would you have when you produce?	2. There will be 2.85 (approx. 3) full dredge cycles a week. The dredging operations on site takes approximately 14-16 hours to fill the hopper. Dredging on site in ML170 is not a continuous operation and as such is not a high-intensity operation in terms of total time on site in any given week or year.	



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NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
David Jarrett	RDJ consulting services	1. Quantity that is stripped from the seabed per week; is that rate higher or lower than NamDeb per week.	1. The annual target is set for 5.5 million tons dredged from less than 2.5 square kilometres which is much less than NamDeb's marine diamond mining operational footprint, which is estimated to be about 15 square km per year and the bottom trawling activities that impact an area estimated at 18000km of seabed.
		2. What happens to the waste, will it be used in building construction or will the rest of it be taken back to sea and dropped off.	2. The coarse fraction waste comprises mostly shell material that can potentially be used to produce by-products used in the construction industry. If not used, it will be stored in a tailings facility.
Gabriel Erastus	Economist	Is the waste being released, harmful?	There are no toxic chemicals used in the beneficiation process and the process water is transported to a tailings facility and disposed of in the form of slurry.
Potential effect	s of Phosphate mining	on marine biodiversity	
Dr Nichola Knox	NUST	There is only a small area in ML170 that you are going to mine, and it won't be lower than 200m and doesn't incorporate the area of where hake and monkfish inhabit, have you considered reducing your area, to the area where you are	extent of the resource that was explored and identified. Therefore, from a company perspective, it is necessary to protect the investment and value of the defined resources and reserves



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	Scientific Society Scientific Society			
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION	
		mining and appease fisheries.	currently planned in the deeper parts of the Mining Licence area.	
David Russel	Confederation of the Fishing Association	As far as mining goes it is very close to the 200m depth restriction, in the actual SP1 area a third of it is inside. My concern is with regards to the plume, that some of that may be swept into the breeding grounds of the fish and how is that being conserved?	The impacts of sediment plume dispersion will be fully assessed as part of the current ESIA process. While SP1 overlaps, the actual 20-year mine plan area doesn't lie shallower than the 200m depth regardless of what the indications are on the boundaries of the SP1 block. The 20-year mine plan area itself is located in water deeper than 200m. The recent detailed modelling of the sediment plume dispersion from the proposed dredging operations has been defined and shows that the cumulative footprint of the plume over 20 years lies predominantly within ML170 and more importantly the extent of the single dredge plume on its own is significantly smaller and does not extend beyond the ML boundary and disperses over time during the intervals between dredge cycles. While the modelling of where the dredging sediment plume has been defined, the proponent is nevertheless unable to include the other potential impacts of sediment plume generation and	



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		Scientific Society	
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
			dispersion into the breeding grounds of fish that could be derived from other significant activities such as bottom trawling operations that are conducted in the vicinity of the Mining Licence and 200m depth contour. We should note this this down somewhere and discuss it as a cumulative impact in the ESIA report and also list it as a limitation in the very beginning of the
			same report.
Berden U	Earth science	Some countries have phosphate deposits offshore and still don't allow the mining of it. If mining has never been done anywhere in the world before, impacts may be much worse than anticipated, how do we know the impacts and how to deal with those impacts.	been a ban in the form of a moratorium or prohibition on seabed
			The impacts and management of seabed dredging operations are well documented and understood at an international industry



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NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
			level. The proposed marine phosphate mining is essentially a standard dredging operation for recovery of sand, which in this case contains phosphate. A similar dredging operation in UAE for example would not be considered as a world first operation and would just be seen as a land reclamation project, because dredged sand would be used to build an island. Dredging of seabed sediments for recovery of minerals is not new in Namibia as it is already being done in in the form of seabed diamond mining.
Waldie	Scientific society	Underwater noise, dolphins and whales are sensitive to noise, has this been taken into consideration?	The Proponent has considered the concerns of the public and has commissioned several specialist studies to address those concerns. This particular concern has been considered in 2012, 2014 and a further noise propagation study was done in 2020. The results of these studies will be utilised in the current impact assessment to address these concerns.
David Russell	Confederation of the Fishing Association	Heavy metals in SP1 will be released by the plume and the fishing level will be closed if the heavy metals in fish get too high.	The potential risks associated with heavy metals and sediment plume dispersion will be fully assessed in the current ESIA process. Heavy metals occur in the seabed sediments on the seafloor



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NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
			throughout the Namibian coast and not just in SP1. Relevant toxicity studies and elutriation studies have been done as well as studies on the potential of suspended and dissolved heavy metals in the water column and the ingestion of particulates of sediments and impacts of organisms in the benthos. Ecosystem impact assessments have also been done. Assessment of the potential risk related to these aspects will be
Dr. Doy Mullor	Windhoek Resident	Cumulative Effect of bottom trawlers on benthic	assessed as part of the current ESIA process. The observation is well noted as is the further comment that one
Dr Roy Muller	windhoek Resident	fauna	would like to see an impact assessment on benthic trawlers so that seabed mining doesn't get blamed for environmental impacts that are not caused by mining.
Mitigation mea	sures and monitoring		
David Jarrett	RDJ Consulting Services	How is NMP going to assist its enforcement in ensuring the mitigation of negative impacts and monitoring?	Consideration will be given to the recommendation for independent peer review and by a multidisciplinary board to be appointed to review the environmental performance of the company and their project and to report their findings and
Gabriel Erastus	Economist	What is the company doing to ensure mitigation and compliance actions are carried out?	recommendations independently.



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	Scientific Society			
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION	
Jessica Bezuidenhout	Environmental compliance Consultancy (ECC)	Wasn't there a suggestion for an independent panel to monitor activities during the previous EIA? (Question posed to Dr Chris Brown)	Dr Chris Brown's answer as CEO of NCE: as part of the enforcement and building public confidence in the project we thought it would be best to have an independent monitoring team under an independent government or committee established. This would comprise of government agencies, the private sector, mining sector, fishing sector, NGOs, etc to oversee it. The private monitoring group would report to the previously mentioned body and would publish results on a website, so that results would be available in real-time. In the diamond mining programs, they have the same system based out of Cape Town that has been monitoring their activities for the past 12 -15 years. Therefore, monitoring is conducted by independent scientists and the results are published in an annual report are peer-reviewed	
			by internationally recognised marine scientists and thus have been able to look at the impact of dredging over the years and	



Address: 110 Robert Mugabe Avenue, Windhoek

NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
			can compare areas of the seabed where dredging has taken place
			and where no dredging has taken place. What has been found so
			far is that in open areas where the sea can reform the sediments
			and be colonized by the benthic organisms coming back can take
			place, it typically takes 6-8 years for the seabed to recover to the
			point where you can't tell the difference between areas that have
			been mined and haven't been mined.
			In rocky more secluded areas for the seabed to recover it takes a
			bit long 10-12 years. This dredging is the most sustainable mining
			operation you can get. The sea reforms itself whereas on land it
			leaves big holes.
Socio-economic	•		
Gabriel Erastus	Economist	Profit is only spilt between shareholders, but the	
		people share the cost of any environmental	will be assessed as part of the ESIA process.
		damage incurred.	
Dr Roy Muller	Windhoek Resident	Comment: Benefits of mining to Fiscus	Economic and social benefits of the project and related impacts
			will be assessed as part of the ESIA process. Taxes, royalties and
			employee's PAYE contributes to the economy and FISCUS earns
			over and above company profits.



Wednesday, 9th February 2022, 18h30 Address: 110 Robert Mugabe Avenue, Windhoek Scientific Society **RESPONSE / CLARIFICATION STAKEHOLDER COMMENT/QUESTION RECEIVED** NAME **DETAILS ESIA Process** Confederation of the How long do people have to register as an I&AP? ECC will allow you to register throughout the whole EIA process David Russel and will take in comments as much as we can within the time Fishing Association restrictions given to us within the regulations. Chello Advocate for a better Why are we going through this process again? 1. 2012 Detailed feasibility study (DFS) completed Marine ML Africa 170 EIA and ECC application submitted 2. 2013 ML 170 additional stakeholder consultation completed 3. 2013 EIA verification studies commenced 4. 2014 18-month moratorium announced by MFMR 5. 2015. EIA verification studies completed 6. 2016. 18-month moratorium concluded 7. 2017. Environmental clearance certificate awarded to NMP for ML 170 Marine Phosphate Mining 8. 2018. Appeal & legal action initiated; project suspended at this time 9. 2019. Public consultation recommenced by order MEFT 10. 2020. Supplementary environmental studies completed



	Wednesday, 9th February 2022, 18h30 Address: 110 Robert Mugabe Avenue, Windhoek			
	Scientific Society			
NAME	STAKEHOLDER DETAILS	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION	
			11. 2021. Legal action completed, and high court judgment issued to: Confirm ML validity to reapply for ECC	



Table 3 - Comments and feedback from NatMIRC focus meeting engagement

Stakeholder Engagement with the Ministry of Fisheries and Marine Resources
Friday 11 th February 2022
Address:

NatMIRC Nat Microscopic Nation (1997)			
NAME	STAKEHOLDER	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION
	DETAILS		
NatMIRC attendees	Ministry of Fisheries and Marine Resources		1. Award of an environmental clearance certificate is a requirement that relates to the Mining License, not as a whole.
		2. Regarding the BID, will we have access to the socio-economic report?	2. Yes, access will be given.
		3. Will the uranium concentrations of U238 be included in the assessment?	3. Yes.
		4. Was the model of the currents developed within only one season?	4. The model of currents produced by UK based specialist group HR Wallinford comprises comprehensive observations and predictions based on all seasons and the model outputs have been verified with in-situ current measurements on ML170 collected over a 3-month continuous period during the 2014 verification study.
		5. During which months were the biodiversity studies	

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Stakeholder Engagement with the Ministry of Fisheries and Marine Resources Friday 11th February 2022 Address: NatMIRC

	Nativire			
NAME	STAKEHOLDER	COMMENT/QUESTION RECEIVED	RESPONSE / CLARIFICATION	
	DETAILS			
		conducted and did they coincide with the recruitment and spawning months?6. There is a concern about spawning areas, removal of substrate for monkfish and emphasis needs to be put on spawning activities. Also, a lot of effort has gone into hake and monkfish studies but has NMP looked at other species?	 5. This information is available in the 2014 EIA verification study for further review by MFMR. 6. These aspects have been considered in the 2012 and 2014 EIA verification studies specifically (which have been previously reviewed by MFMR) and will also be assessed as part of the current ESIA process. 	
		7. Will monkfish be sucked up?	7.There is a possibility, however the dredger is slow moving (approx. 1 knot) which enables opportunity for fish to move out of the way. The data available show monkfish catch was low in that area; therefore, it is possible but not likely to be significant risk.	
		8. Following the spawning issues, on a CSIRO visit to Australia, concerns about seabed mining came up and activity that coincides with spawning will not be allowed	8. We are not sure of any regulations in Western Australia regarding this. Each case will be unique and good scientific data would be required to substantiate any such proposal.	



Table 4 - Comments and feedback from Walvis Bay Public meeting

	Second Public Meeting				
	Friday, 11th February 2022, 16h00				
		Address:			
		WALVIS BAY TOWNHAL	.L		
NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION		
Operational Proce	esses				
Walter Hansen	Ocean Conservation Namibia	How is Sandpiper going to mine differently to reduce toxic effects?	The proposed mining operations for the Sandpiper Project are based on the use of standard seabed dredging using a trailing suction dredge arm. Toxicity effects of dredging are related to the composition of the seabed sediments and related biogeochemical impacts of the sediments. These parameters have been thoroughly assessed in previous specialist studies and the potential risks will be re-assessed in the current ESIA process.		
Bronwen Currie	Walvis Bay resident	Elaboration on the dredging process and cycles. Mining will go up to 6 meters depth. Mud and sediment will be stirred up. These sediments are very high in heavy metals and uranium. Marine life is non-selective and will take up these	Impacts related to the potential risk of heavy metals, including uranium, sediment plume dispersion, toxicity, bioaccumulation and cumulative effects have been assessed in specialist studies completed it the 2014 EIA Verification study and further studies have been since completed in 2020. The results of previous and recent studies will be utilised to		



WALVIS BAY TOWNHALL			
STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION	
	particles, consistent plumes in the water	assess the potential risks as part of the current ESIA process.	
	column will lead to bioaccumulation.		
	Fish are extremely valuable to our	The phosphate deposit does extend down to six meters in	
	economy, consumers and jobs and the	places on the western side of the mining licence (ML170)	
	ecosystem functioning. The effects of	however, the deposits in the defined 20-year mine plan area	
	this process may only show up in the	go up to depth of 2.5m below seabed. So, mining will not	
	food chain many years later.	remove up to 6 m of the seabed.	
		The annual cycle of the dredging is not continuous and	
		comprises footprint of less than 2.5km² per year (actual	
		average area of 1.7 km2 per year over 20 years). The footprint	
		is small compared to other seabed mining operations which	
		dispose of sediments continuously over the side of their	
		vessel. The marine diamond mining fleet now has five	
		production vessels mining the ocean seabed, which are	
		working 24/7 continuously and pump 90% of their material	
		overboard into the water column. By comparison the	
		proposed operation in ML170 will only have one vessel	
		working 2.85 cycles a week. It will not be a continuous	
		dredging operation and the material being pumped back	
		STAKEHOLDER DETAILS COMMENT RECEIVED particles, consistent plumes in the water column will lead to bioaccumulation. Fish are extremely valuable to our economy, consumers and jobs and the ecosystem functioning. The effects of this process may only show up in the	



Second Public Meeting

Friday, 11th February 2022, 16h00

Address:

	WALVIS DAT TOWNHALL			
NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION	
			overboard is significantly less.	
			Heavy metals and uranium are not only found in the SP1 area	
			in ML170. They occur widely in sediments at various locations	
			on the Namibian continental shelf.	
			Heavy metals have tendency to accumulate predominately in	
			the mud belt, which is not in the ML170 mining area, it is	
			further to the east	
			Phosphate distribution map also shows that, phosphate is	
			distributed in various concentrations in most sediments on	
			the inner and middle shelf as well.	
			LIK been deep statistication of LID Well's extended	
			UK based specialist group HR Wallingford was appointed to	
			do the very detailed modelling of ocean currents and	
			sediment plume dispersion, which they also did for the	
			proposed marine phosphate projects in Mexico and New	
			Zealand. The concerns as noted have been taken into	
			consideration and specialists in their field have looked at	
			these concerns including potential impacts on the	



NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION
			ecosystem., as well as on the benthic organisms.
Malcolm Hoabeb	UHC	Implications of what is going to happen to the environment in the region, may lead to bioaccumulation of toxins in the food chain, what is going to be done to mitigate these risks?	Impacts related to the potential risk of heavy metals, including uranium, sediment plume dispersion, toxicity, bioaccumulation and cumulative effects have been assessed in specialist studies completed it the 2014 EIA Verification study and further studies have been since completed in 2020. The results of previous and recent studies will be utilised to assess the potential risks as part of the current ESIA process.
Mitigation and Mo	onitoring		
Maria Manuela	Walvis Bay resident	With the complexity of the project and the government may not be able to adequately monitor the mitigation actions of NMP's EMP, how will the Proponent assist the government in monitoring the impacts of the project?	Consideration will be given to the recommendation for independent peer review and by a multidisciplinary board to be appointed to review the environmental performance of the company and their project and to report their findings and recommendations independently.
Nadiadre Dreyer	Ocean Conservation Namibia	Due to the limitations of the government, would there be a ship	



	WALVIS DAT TOWNHALL			
NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION	
		allocated to this project to continue the	monitoring of all marine operations.	
		monitoring, would NMP be willing to	As far as this project goes, NMP has taken on its own set of	
		provide the boat or assist with the	responsibilities to do monitoring for the program as we did	
		acquisition of the boat for consistent	for the baseline surveys, mitigation surveys and frequency of	
		monitoring?	monitoring will all be funded by contractors to gather	
			information in accordance with the EMP and will be	
			submitted by the Ministry of Environment.	
Socio-economic in	npacts			
Daniel	Labour union	Comment: As a union leader I want to	Comment noted.	
		see employment.		
François von	Erongo Marine	Comment: Everyone in the fishing	Comment noted.	
Merws		industry keeps saying this has not been		
		done before anywhere but we can't say		
		because it hasn't been done anywhere		
		else in the world that it can't be done.		
		So many countries started with projects		
		and others followed and this can be a		
		similar case with Namibia. Walvis Bay is		
		a problem for unemployment. There is a		



NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION		
		very high level of unemployment in			
		Walvis Bay, and I think that this is a			
		project that can help the country and			
		can help alleviate the unemployment			
		crisis. We can see that the fishing sector			
		alone can't sustain the job demand in			
		the country. So, I wholeheartedly			
		welcome this project. If the project			
		follows all regulations, then I don't see			
		anything wrong with going ahead with			
		the project. If anything goes wrong, they			
		will be taken to task. The project can			
		coexist with other sectors as it has been			
		proven with the diamond mining			
		industry and the fishing industry that			
		has been coexisting.			
EIA Process					



WALVIS BAT TOWNHALL					
NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION		
Nangula	Municipality of Walvis Bay	1.There was a previous EIA study for phosphate mining, what are the key lessons that you have learned from the previous study.	1. The previous EIA process was followed in several stages. The initial EIA was completed at the point where the government was changing its regulation from the environmental aspect being managed by the Ministry of Mines to being handled by the Ministry of Environment and the implementation of the new legislation. What we learned in that process was the value of public consultation is and how it should be carried out. Our lesson has been to listen and always act where we believe it is reasonable, has been justified and is worth the investment to make sure that A. the project is run properly, and B. that the legitimate concerns that are raised are properly addressed.		
		2.If no new specialist's studies will be done, what are you as an independent EAP going to do differently.	2. New studies have been completed in 2020 and are included in this ESIA process. Further than that, at this stage, not yet, unless something comes up from the screening and scoping phase, but we will listen to the public and follow the correct procedure and take all comments and concerns on board and make sure that our scoping report adequately		



WALVISTAL TOWNHALL			
NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION
			captures that and that the impact assessment is a true
			reflection of the process followed.
			However, we will be using information from specialist studies
			that were done both during and after the previous EIA.
Rodney Braby	GIZ	Compare notes from the EIA process in	New Zealand deposit is different in character and setting than
		New Zealand, why was that application	that in Namibia. The deposit sits at 400m, it is formed as a
		rejected yet this project should go	concretionary deposit, which means it forms a series of
		ahead?	lumps of phosphate that occur inside muddy sediment and
			that muddy sediment is overlying a rocky platform that has
			fish in some areas and has been declared a reserve. The
			concentration of those nodules is so low that they must
			excavate about ten times more seabed than we would have
			to do to get an economically viable concentrate of phosphate
			out. In Namibia, the deposit is 200-220m deep, it is in a
			featureless sediment area where there are no structures, cold
			water columns or sensitive habitats.
			A sample of the seabed extends for large parts of the shelf in
			that area and that is why New Zealand got a different result
			on their assessment. Cannot draw a parallel between New



NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION
	517,1125		Zealand and Namibia as the characteristics of the deposits are different.
Unknown	Walvis Bay Resident	Ivis Bay Resident Engage the public on the impact and implications of the project. The due process of the environmental impact assess process requires the engagement of the public to opportunity to register their comments on the impact implications of any new project requiring a full environmental impact assessment.	
Land based activit	ties and impacts		
Nangula		Why does there need to be two separate EIA for the marine phase and land-based phase of the project? If the marine-based ECC is granted will the land-based ECC automatically be granted? Is this EIA dependent or independent from the previous EIA?	The law requires that an environmental clearance certificate be issued for a mining license in order to authorize any operations in the mining licence area. The mining license ML170 is in the ocean 160 km southwest of Walvis Bay. A separate environmental clearance certificate is required for the sites allocated for the land-based activities which will include the processing plant.
			There can be no investment in progressing the land component of the Project if there is no valid authorisation to conduct operations in the mining license where the vessel



Second Public Meeting

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NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION
			and mineral deposits are located. Therefore, it is a
			requirement to have two separate EIA processes
General			
Daniel	Labour union	1. Question: Should anything go wrong	1. NMP is committed to operating within industry accepted
		is NMP there to take responsibility.	best practices and principles as well as Namibian law. Within
			its obligations of the licence it receives, the certificate is only
			issued for three years. The EMP stipulates monitoring to be
			undertaken during that time, and the results should be put
			forward and assessed independently by the Ministry of
			Environment, Forestry and Tourism.
			If there is any activity that shows that there is damage
			created beyond the levels of acceptability, then the power of
			the Ministry is to immediately terminate those operations in
			the event of any catastrophe. Some insurances must be taken
			out by all of NMP's operating companies to ensure that funds
			are available to cover and close out those obligations.
			There are therefore two levels of comfort that NMP stands by
			and maintains responsibility for its operations, mitigation
			measures and monitoring measures. We will make sure that



Address:

NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION
			NMP operates within the confines of the law and EMP which is legally binding. The Project is being monitored and will continue to be monitored closely.
		2. Question posed to the fishing industry: different species of fish have disappeared even without the presence of phosphate mining, what makes you so adamant that phosphate mining will have a negative impact on fish populations?	
Malcolm	Walvis Bay Resident	Can we get information that is easier for the average person to understand?	Information will be provided, and scientific information will be communicated as best possible and in a way that the public can understand. NMP will try to bring the details of the study down to a level where it can be understood but we still need to understand that this work is done by specialists is complicated and needs experts to understand and assess the findings. One must not lose sight of the fact that these are highly complicated and complex issues, there is a risk of trying to reduce the studies



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NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION
			down to very simple statements because the facts may then
			be at risk of being misinterpreted or misrepresented,
			Accordingly there is there is a responsibility by scientists to
			not over simplify or understate facts related to complicated
			issues.
Rodney Braby	GIZ	Diamond mining shouldn't be compared	That is correct. Not trying to compare them in terms of
		to phosphate mining because they are	sensitivity and scale. We are looking at the setting of those
		in different areas and have different	deposits and the setting of the diamond deposits is also on
		habitats.	the Namibian continental shelf at water depth of 150m, which
			is 50m shallower than the marine phosphate deposits that
			occur on the continental shelf at 200-2225m in this case. The
			actual operation of both phosphate and diamond mining
			involves seabed excavation It is only the chemistry of the
			sediment in the two areas that are slightly different that
			makes them not directly comparably but for all other intents
			and purposes, they are in equivalent settings on the
			Namibian continental shelf in terms of approximate water
			depths and in terms of environmental sensitivity in which
			they find themselves.



NAME	STAKEHOLDER DETAILS	COMMENT RECEIVED	RESPONSE / CLARIFICATION	
John Esterhuizen	Municipality of	When you look at what a mine does	The pilot work for the project has been done in Johannesburg	
	Walvis Bay	when they don't know what may	during the feasibility study for the land-based materials	
		happen, they usually build a mini-mine	processing plant. From a marine side, tried and tested	
		first. The public is concerned about the	dredging equipment and methods are going to be used by an	
		project. Has the proponent thought of	experienced international dredging contractor using a	
		starting a pilot project first to assess the	standard dredging process with some modification to the	
		potential impacts?	dredger to extend the range of the dredge arm.	
			Mitigation and risk assessment has also been done as part of	
			the feasibility study. Public concerns related to the project are	
			taken into account through this scoping process for the	
			current ESIA and application.	



 Table 5 - Comments received via email and telephone and feedback

	General I & AP comments Submitted Via email or phone call					
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
1.	David Russell	Federation of Namibia Fishing Associations	Concerned that the operations of Namibian Marine Phosphates do not harm the Namibian commercial fishing industry, including aquaculture, or the Benguela Current marine ecosystem, and that the onshore operations linked to processing do not harm the inhabitants of Walvis Bay and the surrounding environment.	Comments noted. These aspects will be fully assessed in the current ESIA process. Previous comment in relation to these concerns as noted herein refer.		
2.	Phil McCabe	Deep-Sea Conservation Coalition	How do we know that the EAP has no direct business, financial, personal or other interest in the approval or refusal of the application? Are their interest is in the protection of the marine environment?			



			General I & AP comments Submitted Via email or phone call	
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
				findings that are not favorable to the applicant.
3.	Knowledge Ipinge	Affirmative Repositioning: Community Activism	How can Phosphate mining and the Fishing industry co-exist? Training and development opportunities for the local youth.	Considering the environmental studies completed and reported to date on the Sandpiper Project, the best available scientific evidence and expert opinions indicate there is no reason why phosphate mining and the fishing industry could not co-exist. The proponent has encouraged constructive engagement with the fishing industry in this regard and remains open to develop opportunities to facilitate constructive co-existence.
4.	Desmond Tom	Ministry of Fisheries and Marine Resources	Interested in the effects of mining on the marine environment	Comment noted. These effects have been reported previously in 2014 and will be assessed in the light of new studies completed in 2020 as part of the current ESIA process.



	General I & AP comments Submitted Via email or phone call					
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
5.	Chris Brown	Namibian Chamber of Environment	Interested in projects undergoing due process and then decisions being evidence-based on best available information, while taking known and anticipated risks into account - not on uninformed emotion.	Comment is well noted.		
6.	Marcia Fargnoli	Earth Organization Namibia	-Dredging of 3-6 meters of the seafloor will cause direct irreparable destruction to the building blocks of the marine ecosystem in the benthos layer causing direct harm to the food supply chain for endangered sea turtles, endangered marine mammals, fish and humans. -There will be direct harm to hatcheries for fish species such as juvenile monk and hake. -There are serious potential negative effects on the spawning of fish.	statements on the website and in the		



			General I & AP comments Submitted Via email or phone call	
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
			- There are serious potential negative effects of a disturbed ecosystem (turbidity) on marine predators including hake and endangered African penguins.	The studies completed to date show no evidence to support any of the claims made in the statement provided by Earth Watch Namibia.
			-The release of hazardous substances including radioactive materials, methane gas, and hydrogen sulphides will directly kill wildlife and cause many commercial fish stocks including hake and monk to be unmarketable and not sale quality as food quality regulations for export are stringent.	The current ESIA process will assess all the key concern areas broadly noted in the statement and will be based on the best available evidence-based science and information. while taking known and anticipated risks into account.
			- Plumes will negatively affect zooplankton, another building block of the Benguela current marine ecosystem, further causing harm to marine wildlife including endangered marine mammals.	
			- Soluble phosphate entering the water and acting as a fertilizer will increase algal blooms and harm shellfish and other species.	



			General I & AP comments Submitted Via email or phone call	
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
			- Change in the nutrient balance in upwelling	
			will affect the Benguela Current marine	
			ecosystem which relies heavily on the	
			upwelling of nutrients that are carefully	
			balanced.	
			-Noise and hazardous waste pollution will	
			directly affect and potentially damage	
			endangered marine mammals irreversibly.	
			-Increase in phosphate nutrients will increase	
			algae and bacteria in the water making salt for	
			salt mining too poor of quality for sale.	
			-Poor quality seawater will hamper the	
			aquaculture industry.	
			aquacultul e illuusti y.	
			Impacts on the Land	
			-According to the Environmental Impact	
			Assessment, 125,500 tonnes of phosphate and	
			radioactive and other waste will be discharged	
			onshore during each week of operation, with	



			General I & AP comments Submitted Via email or phone call	
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
			the transfer to shore being once every 2-3 days. These are radioactive substances that will certainly have numerous environmental impacts, especially on human and environmental health. -A buffer pond containing radioactive substances is set to be placed by the internationally protected RAMSAR site of Sandwich Harbor and a National Park, causing direct harm to the legally protected land ecosystem.	
			 -A pipeline will cross through two National Parks carrying radioactive substances, further exposing the public and the wildlife to radiation. -A processing plant and tailings dam by the sewerage works in Walvis Bay will disperse radioactive materials and chemicals into underground water and through the air. 	



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Det	ails	Comments/Questions Received	Response/Clarification
				-The potential for flood events and sea-level	
				rise will cause radioactive and chemical waste	
				to be released throughout the town of Walvis	
				Bay as well as into the surrounding National	
				Parks.	
				-Plans to release waste products and seawater	
				back into the ocean will cause additional	
				negative impacts on marine life.	
				-Water requirements of 320 cubic meters of	
				fresh non-potable water per hour will impact	
				the local desert communities and environment	
				to which this freshwater is a vital resource,	
				especially in the hyper-arid coastline during	
				times of drought.	
7.	Peter	Municipality of	Walvis	Will All mining-related waste I come to the	Tailings from shore-based processing
	Etsebeth	Bay		Walvis Bay landfill site	activities will be stored in an appropriate
					tailings' disposal facility. The land-based
					activities will be subject to a separate
					ESIA process in due course.



	General I & AP comments Submitted Via email or phone call					
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
8.	Coleen Mannheimer	Concerned Citizen	As has happened before with a uranium project, I find that this BID supplies insufficient information to allow I/APs to get a clear idea of what is planned and, as a result, it is not possible to express concerns in detail. Amongst others, I would be interested to know where in the world this has been done before, why you think that only MME should make decisions rather than both them and MFMR. Also, there is no information on what fraction of the mining area will be left undisturbed for recolonization and how this will be achieved (and some references to access where this has been achieved, and how, elsewhere). There is little information on land-based activities and what resources they will require.	The BID is prepared in accordance with the EMA (2007) to provide adequate background information on the project to enable the public to contribute to the determination of the scope of activities to be conducted in the detailed ESIA process and report. The detailed ESIA is then provided to the public to enable further comments. The proposed activity is essentially a seabed dredging operation which is common practice internationally and in Namibia. Decisions regarding environmental clearance certificates are made by the Environmental Commissioner in consultation with all relevant competent authorities, including MME and MFMR.		



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
				The scale of the proposed dredging operations will access an average of 1.7km² seabed on an annual basis (<0.1% of ML170 area) and a total of 34km² over the 20 year (<2% of ML170 dredging operations in ML170. Land based activities will be addressed fully in a separate ESIA process to follow after permitting of the marine component in ML170 has been completed.	
9.	Sarah Yates	Namibia Scientific Society	I have concerns about biodiversity loss (bathypelagic fish mortality, sessile organisms), the noise, light, sediment plumes (smothering of organisms), and increased temperature (influence growth, reproduction, and metabolism) in the water column due to mining operations. How the altered environment will favour jellyfish populations. I also have concerns over who will benefit from this project?	Comment noted. Impacts related to the potential risk of biodiversity loss, and water column related to heavy metals, including uranium, sediment plume dispersion, toxicity, bioaccumulation and cumulative effects have been assessed in specialist studies completed it the 2014 EIA verification study and further studies have been since completed in 2020.	



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
10.	Johannes	Ministry of Works and	How is the product will be transferred to	The results of previous and recent studies will be utilised to assess the potential risks as part of the current ESIA process. The product will be transported to Walvis	
	Muzanima	Transport, Directorate of Maritime Affairs, Walvis Bay	Walvis Bay? Will the vessel used to be registered in Namibia and employ Namibians in key positions? or what will Namibian seafarers benefit from? Will there be a chemical reaction between phosphate and seawater that already contain other dissolved elements? If yes, what will be their impact on marine life, water pollution and the coastal community?	Bay by the dredge vessel. International the dredger to be used is owned and operated by international dredging Contractor Jan De Nul. Jan De Nul will establish an operational support office in Walvis Bay which will operate support vessels to service the dredging operations onsite which will provide opportunity for employment of Namibians. The biogeochemical aspects of interaction between dredged phosphate bearing sands and sea water and related potential risks for pollution have been assessed in specialist studies completed in 2014 and more recently in 2020.	



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
				The potential impacts will be assessed as part of the current ESIA process.	
11.	Anja Kreiner	Ministry of Fisheries and Marine Resources	How far do possible plumes travel before settling on the seafloor? What is the composition of the sediment - any heavy metals (Uranium?)	Detailed ocean current and sediment plume dispersion modelling was completed in 2020 by UK based specialist group HR Wallingford. Summary results of the study were presented to MFMR at the stakeholder meeting on 11 th March 2022 (refer minutes of meeting as attached in the scoping report). Additionally heavy metal concentrations in the sediment have been reported in the 2014 EIA verification study and more recently in 2020. The assessments to date included an assessment of uranium content. The aspects of plume dispersion and heavy metal concentration will be assessed and reported in the current ESIA process.	



	General I & AP comments Submitted Via email or phone call					
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
12.	Hans Hückstedt	LL Namibia Phosphates (Marine exploration, mining and beneficiation of industrial minerals)	1. Seabed mining in Namibia is not a new commercial activity. For over 27 years, the marine diamond mining industry has coexisted in the same marine ecosystem as the fishing sector, allowing for both industries to become major economic contributors. To ensure the co-existence of marine industries can continue and their environmental impact is kept to a minimum, both the marine diamond and fishing industries are monitored and managed. The same approach should also be considered for marine phosphate mining in Namibia, which has a comparatively smaller footprint than marine diamond mining and fishing. What is important and comforting to know is that adequate controls and measures already exist in current legislation to regulate marine phosphate mining activities, alongside existing commercial marine activities (Minerals Act 1992, Environmental Act 2009).	•		



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
			Let the process of EIA and ECC application		
			proceed with the knowledge of existing marine		
			mining activities coupled with scientific data.		
			2. For the last 25 years marine diamond		
			mining in Namibia has co-existed along with		
			the fishing industry in the same marine		
			ecosystem.		
			Over this time both industries became and		
			remain major economic contributors to		
			Namibia. The co-existence of marine industries		
			and the minimal environmental impact of both		
			the marine diamond and fishing industries are		
			proof of the well monitored and managed		
			environmental plans. Similarly, this approach		
			should also be considered for marine		
			phosphate mining in Namibia. Namibia is in a		
			very fortunate position of being world leaders		
			in marine diamond mining and the experience		
			and knowledge drawn from this should be		
			used for the development and decision		



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
			making of future seabed mining. What is important to understand is that adequate environmental controls and measures already exist in current legislation to regulate marine phosphate mining activities alongside the existing commercial marine activities. Abundant conclusive physical evidence and an extensive body of scientific data on the recovery of the seabed have been gathered over the past +20 years, and the two main findings of the 2008 BCLME Report on the Cumulative Impacts of Seabed Mining (over 10 years) are that: 1.The impacts of seabed excavation for marine diamond mining do alter the habitat in the mining area but are not significant at the scale of the operations when compared to the overall marine ecosystem.		



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
			2. The seabed does recover over time, albeit at differing rates. The scientific evidence available, and a comparison of other areas employing similar mining methods, confirm that a mutual coexistence of sectors is possible and the inclusion of marine phosphate mining into the marine ecosystem will neither be detrimental to Namibia's fishing sector nor her environment.		
13.	Walter Hansen	Ocean Conservation Namibia	Long term effects of the project on local ecosystems as well as the health and safety of the community.	Ecosystem impact modelling was completed as part of the specialist studies included in the EIA verification study. Potential long-term ecosystem and related impacts will be assessed including data from new studies completed in 2020 and reported in the current ESIA process.	



			General I & AP comments Submitted Via email or phone call	
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
14.	Jeffrey	Ocean Conservation	The Southern population are very dependent	Specialist studies related to potential
	Harris	Namibia	on feeding on young hake. It could be that the	impacts on breeding areas of hake have
			project affects the breeding areas of the hake	been conducted and will be assessed as
			population.	part of the current ESIA process.
15.	Jason Angala	Wet Landed Horse	Object to the 'proposed' ML-170 mining zone	Comments noted. The matter refers as
		Mackerel Association	as indicated on the draft MSP as per objection	an issue related to marine spatial
		(WLHMA)	presented to MSP consultation on 21 February	planning and operational access. No
			2022. The area North of 25.25 degrees is a	issue relating to environment have been
			crucial and dedicated fishing area for the wet	raised. Potential environmental and
			horse mackerel sector. The sector has invested	operational impacts on all forms of
			over NAD 1.5 billion to date and employs 1,450	commercial fisheries will be assessed as
			Namibians, this figure will increase to	part of the current ESIA process, based
			approximately 3,000 during 2022 and will grow	on best available data and information.
			beyond that. We are the only sector with	
			significant growth in terms of onshore	
			employment in the fishing industry, especially	
			for women and youth in line with the NDP5.	
16.	Jean-Paul	Marine Ecologist	My main interest is the potential impacts (and	Ecosystem impact modelling was
	Roux		the methods to mitigate them) on the marine	completed as part of the specialist
			ecosystem (particularly the food web), the	studies included in the EIA verification
			species of conservation concern and the	study.
			fisheries resources like the hake stocks.	



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
				Potential long-term ecosystem and	
				related impacts will be assessed	
				including data from new studies	
				completed in 2020 and reported on in	
				the current ESIA process	
17.	Bronwen		1. Environmental regulation of deep-sea	1. The pelleted marine phosphate	
	Currie		(defined as in water depths of 200m and	deposits in ML170, as well as the marine	
			deeper) mining has received focused attention	diamond deposits further south, are	
			worldwide in recent years with the formulation	relict and/or placer sedimentary deposits	
			of rules and guidelines. In that regard,	that occur on the inner and middle	
			Namibia's responsibilities as a signatory to the	continental shelf of Namibia in water	
			United Nations Convention of the Sea	depths of up to 300m generally. They are	
			(UNCLOS) and a member of the International	not classified as deep-sea minerals	
			Seabed Authority (ISA), require that "national	which, as noted in numerous scientific	
			regulatory measures shall be "no less	publications, comprise a specific suite of	
			effective than international rules, standards	polymetallic nodules, cobalt crusts and	
			and recommended practices and procedures"	seabed massive sulphides that are	
			under Art 208 (3) of UNCLOS". Whilst Namibia	formed by processes occurring in specific	
			has sovereign rights to her mineral resources,	deep-sea environments on the	
			she does not have sovereign rights to harm	Continental Slope and Abyssal Plain at	
			her ocean waters (UNCLOS). The alignment of	water depths of 1000-6000m.	
			environmental assessments for deep-sea		



			General I & AP comments Submitted Via email or phone call	
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
			mining in Namibia must be judged accordingly.	Application of the nominal depth of
			Regarding previous impact assessment studies	200m as the criteria for classification of
			and reports for the proposed NMP phosphate	deep-sea mining in is not unequivocally
			mining project, basic baseline information	supported in scientific literature.
			upon which impacts were assessed is lacking	
			or erroneously interpreted.	Territorial Sea and Exclusive Economic
				Zone of Namibia Act, 1990, Act No. 3 of
			2. In line with the NMP EIA process re-starting	1990 determines and defines the internal
			in 2022, the applicable international rules,	waters, territorial sea, contiguous zone,
			standards and guidelines are publicly available	exclusive economic zone and continental
			for guidance and reference, as are hundreds	shelf of Namibia in accordance with the
			of scientific and legal publications within the	provisions of UNCLOS which is based on
			past six years, and ongoing. The piecemeal	the physical features of the continental
			variety of reports and documentation	shelf and distance from shore and is not
			submitted by NMP to MET since 2012, appears	based on water depth as defining criteria.
			to disregard these valuable resources.	
				UNCLOS Article 193 confirms the
			3. Impacts can be formulated using only	sovereign rights of States to exploit the
			accurate baseline studies, which are essential.	natural resources within their Economic
			So that scientifically credible baselines are	Exclusive Zone pursuant to their
			used for impact assessments that are	environmental policies and in accordance
			particular to deep-sea mining in Namibia, the	with their duty to protect and preserve



General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification
			appropriate baselines should be derived from	the marine environment. Administration
			sampling and analyses according to accepted	and regulation of activities in the
			international standards. Without such basic	Namibian Exclusive Economic zone falls
			work, the impact assessments presented in	under Namibian law.
			the ESIA will be no better than guesswork and	
			will continue to be challenged. The NMP	Comments 2, 3, 4, 5 and 6 are noted. In
			reports to date contain scientific methodology	this regard relevant baseline and
			that is below standard, outdated, or incorrect,	specialist environmental impact
			thus the given assessments are not	assessment studies utlising appropriate
			scientifically credible, and on a scientific basis	methods have been completed covering
			cannot be accepted. The statement at the	the key areas of concern and reviewed by
			public meeting in February 2022 that past	external experts. Further supplementary
			specialist studies will be re-used in the present	studies on key aspects of sediment
			ESIA refers, and is therefore questioned? And	plume dispersion and toxicity have been
			will be interrogated further as necessary when	completed in 2020 to further address the
			reports become available.	key concerns as noted.
			4. As the entire ESIA process has begun anew	Assessment of the potential impacts will
			in 2022 (indicated by request for the initial	·
			step of "scoping" at public meetings in	•
			February 2022) the following are required by	current ESIA process, incompliance with
			the EPAs managing the ESIA:	' '



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
			a. Robust baseline studies according to international best practice guidelines: see for example attached annotated document which is publicly available. These include:	applicable under Namibian law and any related international legal obligations thereunder.	
			b. Detailed water column studies to allow impact assessment on the entire pelagic ecosystem and the services delivered		
			c. Detailed analysis of heavy metal and radionuclide concentrations in 2-3m deep sediments (gravity cores) in mining areas		
			d. Detailed current data and modelling of plumes		
			e. Toxicological studies, with particular to the plume delivery and suspension time of the finest sediment particles in the pelagic ecosystem, includes: f. Experimental and where appropriate		



	General I & AP comments Submitted Via email or phone call					
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
			modelling exercises to illustrate the impact of			
			the fine particulate matter in plumes, on			
			marine life during the lifetime of excavation			
			and transfer of bulk seabed material i.e.,			
			cumulative impacts over the lifetime of the			
			mine. Special attention should be paid to fine			
			particles transporting heavy metals and			
			radionuclides.			
			g. Improvement in all other aspects already			
			identified or commented on, by any party, in			
			the preceding 2012 – 2018 reports submitted			
			to MET.			
			5 It is appreciated and apparent that neither			
			the local public, nor the EPAs, nor the			
			proponent, are familiar with deep-sea biology			
			and deep-sea ecosystem services in their daily			
			lives (and for the ocean, this cannot be			
			expected). Therefore, for easy understanding			
			of the necessary studies, examples of			
			international guidelines for baseline studies			



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
		Stakenolder Details	are attached, partly annotated with comments related to particularly important shortfalls or non-adherence in the previous NMP studies. Fortunately, these types of guidelines are up to date, written by world experts in their fields, and publicly available. 6 Should the detailed methodology for the necessary scientific studies specifically pertinent to the NMP application in Namibia regarding a. Water column communities b. Sediment biogeochemistry c. Toxicology d. Connectivity e. Ecosystem services		



	General I & AP comments Submitted Via email or phone call				
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification	
18.	Naude Dreyer	Ocean Conservation Namibia: Co-Founder	 There were numerous baseline and impact assessment studies commissioned for this project. Are the results of those studies available to the public? In particular, is the HR Wallingford Plume Dispersal Assessment available for public scrutiny? You mentioned in the public meeting that an independent monitoring authority will need to be established. Will this monitoring authority make all findings public? Will the above-mentioned authority 	 all information and studies relating to the current ESIA Report and process will be made available to registered I&APs during the ESIA process and will be available on EAP and MEFT data portals. and 3. any decisions or actions in relation to these suggestions reside with the office of the Environmental Commissioner. 	
			have the power to cease all offshore operations if findings show that any variables of the process are outside of acceptable parameters?		
			4. In your proposed plan, what is your	4. Provision for environmental incidents is incorporated in insurance and	



	General I & AP comments Submitted Via email or phone call					
No	Name	Stakeholder Details	Comments/Questions Received	Response/Clarification		
			worst-case scenario in terms of environmental fallout, and what mitigation measures will be taken to rectify this? Would there be special financial provisions made for this? 5. Are we correct in believing that the land-based proponent of this project has its own public information sessions, ESIA, EIA and EMP? There seems to be almost no information on this part of the project available at all right now.	 operational procedures to be approved for the project. 5. Yes, the full ESIA process will be completed for the land-based component of the project, once permitting of the marine operations in ML170 has been completed. 		



APPENDIX A – STAKEHOLDER PRE-CONSULTATION ENGAGEMENT INVITATION









RE: COURTESY NOTIFICATION AND PRE CONSULTATION, PUBLIC MEETING AND REGISTRATION FOR THE PROPOSED SANDPIPER MARINE PHOSPHATE PROJECT, WITHIN MINING LICENCE 170 OFFSHORE, NAMIBIA.

Environmental Compiliance Consultancy has been contracted by Hamibian Marine Phosphate (Pty) Ltd (NMP) to revise and update the environmental and social impact assessment (ESIA) for dredging of marine phosphate material within mining licence 320 (ML

Tourism for a record of decision.

This letter is intended to inform you that you have been identified as a key and important stakeholder and or interested and Alfected Party (IBAP) for NMP and ECC would like to engage with you for this project.

Our team would like to inform and invite you to the intended upcoming public meetings. A meeting will be held in Windhork on 9 February 2022 at the Scientific Society, and one will be held in Walvis Bay on 11 February 2022 at the Walvis Bay Town Hall. General notification to the public will be circulated in newspapers adverts to be placed on 27 January and 3 February 2022.



RE: COURTESY NOTIFICATION AND PRE CONSULTATION, PUBLIC MEETING AND REGISTRATION FOR THE PROPOSED SANDPIPER MARINE PHOSPHATE PROJECT, WITHIN MINING LICENCE 170 OFFSHORE, NAMIBIA.

Environmental Compliance Consultancy has been contracted by Namibian Marine Phosphate (Ptyl 11d (NMP) to revise and update the environmental and social impact assessment (ISIA) for diredging of marine phosphate material within mining license 170 (Nil.

Environmental Compliance Consultancy (ECC) is conducting the ESIA in terms of the Environmental Management Ata, No. 7 of 2007 and following public consultation, will be submitted to the competent authority and the Ministry of Environment, Forestry and

This letter is intended to inform you that you have been identified as a key and important stakeholder and or interested and Affected Party (IBAP) for NMP and ECC would like to engage with you for this project.



Executive Director – Ms Annely Haiphene Chairperson of the Marine Spatial Planning National Working Group – Dr Anja Kreiner

RE: COURTESY NOTIFICATION AND PRE CONSULTATION, PUBLIC MEETING AND REGISTRATION FOR THE PROPOSED SANDPIPER MARINE PHOSPHATE PROJECT, WITHIN MINING LICENCE 170 OFFSHORE, NAMIBIA.

Environmental Compliance Consultancy has been contracted by Namibian Marine Phosphate (Pty) Ltd (NMP) to cevise and update the environmental and social impact assessment (ESIA) for dredging of marine phosphate material within mining licence 170 IML

Environmental Compliance Consultancy (ECC) is conducting the ESIA in terms of the Environmental Management Act, No. 7 of 2007 and following public consultation, will be submitted to the competent authority and the Ministry of Environment, Forestry and Tourism for a record of decision.

This letter is intended to inform you that you have been identified as a key and important stakeholder and or interested and Affected Party (ISAP) for NMP and ECC would like to

Our team would like to inform and invite you to the intended upcoming public meetings. A meeting will be held in Windhook on 9 February 2022 at the Scientific Society, and one will be held in Walves Bay on 11 February 2022 at the Walves Bay Town Hall. General notification to the public will be circulated in newspapers adverts to be placed on 27 January and 3 February 2022.

NVERDMARNIN, COMPLINICE CONSULTANCY C PO BOX 91155 WINDHOLER, NAMEN MEMBERS, LI NOONEY & JE SEZUEEZHOUT RECEISTRATION MINNESS COSON SYLVAN



Honourable Minister -- Hon John Mutorwa - Ministry Works and

RE: COURTESY NOTIFICATION AND PRE CONSULTATION, PUBLIC MEETING AND REGISTRATION FOR THE PROPOSED SANDPIPER MARINE PHOSPHATE PROJECT, WITHIN MINING LICENCE 170 OFFSHORE, NAMIBIA.

Eméronmental Compliance Consultance has been contracted by Namibian Márine Phosphate (Pty) Ltd (NMP) to revise and update the environmental and social impact assessment (ESA) for dredging of marine phosphate material within mining licence 170 (ML 170), of shore, Namibia.

Emironmental Compliance Consultaincy (ECC) is conducting the ESIA in terms of the Emironmental Management Act, No. 7 of 2007 and following public consultation, will be submitted to the competent authority and the Ministry of Environment, Forestry and

Our team would like to inform and invite you to the intended upcoming public meetings. A meeting will be held in Windhook on 9 February 2022 at the Scientific Society, and one will be held in Walvis Bay on 11 February 2022 at the Walvis Bay Town Hall. General notification





Sent VIA Email:







ENVIRONMENTAL COMPLIANCE CONSULTANCY PO DOX 91193 WINDHOEK, NAMBA MEMBERS: 71. MODIEY 8. JS 8023/JOSENHOUT BROSTERATION NOMBER: OCIZETS/11454

ECC values community input and participation in our projects. Public participation is an important part of the ESIA process, as it allows public and stakeholders to obtain

February 2022



NW.eccenvironmental.com ECC Ref: ECC-133-377-LET-15-C

RECEIVED BY OFFICIAL STAMP Received By Name:



Our team would like to inform and invite you to the intended upcoming public meetings. A meeting will be held in Windhoek on 9 February 2022 at the Scientific Society, and one will be held in Widvis Bay on 11 February 2022 at the Walvis Bay Town Hall. General notification to the public will be circulated in newspapers adverts to be placed on 27 January and 3 February 2022. NUMONMENTAL COMPLIANCE CONSULTANCY PO BOX 91151 WINCHOEK, NAMERA MEMBERS: J L MOCKEY & JS SEZUDONHOUT REGISTRATION NAMERS









APPENDIX B - ADVERTS PUBLISHED

The Market Watch: The Namibian Sun, Republikein and the Allgemeine Zeitung newspapers, 27 January 2022



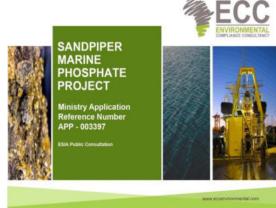


The Market Watch: The Namibian Sun, Republikein and the Allgemeine Zeitung newspapers, 3 February 2022





APPENDIX C – PUBLIC MEETING PRESENTATION



AGENDA



- · Main Objectives
- · Background Information
- · Environmental & Social Impact Assessment (ESIA) Process - Presented by ECC
- NMP Presentation Presented by Mike Woodborne
- · Potential Biophysical & Socio-economic Impacts -Presented by ECC
- · Baseline Studies
- · Public Participation

Meeting Objectives



- Provide information describing the proposed Sandpiper Marine Phosphate Project
- ✓ Provide an overview of the independent environmental and social assessment process
- ✓ Listen to the public and recorded issues or concerns, and incorporate this into the assessment process

Why are we here?

- 2011 Mining licence issued to NMP for Phosphate Mining
- 2012 Detailed feasibility study (DFS) completed
 Marine Mt. 170 EIA and ECC application submitted
- · 2012 ML 170 additional stakeholder consultation
- 2013 EIA verification studies commenced
- 2013 18 month moratorium announced by MFMR
- · 2014 EIA verification studies completed
- · 2015 18 month moratorium concluded
- 2016 environmental clearance certificate awarded to NMP for ML 170 Marine Phosphate Mining
- 2016 appeal & legal action initiated
 Project suspended in this time
- 2018 public consultation recommenced by order
 MEET
- 2020 supplementary environmental studies completed
- 2021 legal action completed and high court judgement issued to:
 Confirm ML validity
 And to reapply for ECC that's why we are here.



NMP Structure and Project Milestones









Sandpiper Phosphate Project – Market and Products



Potential uses

- 1. Direct Application Phosphate Rock
- Single Super Phosphate (SSP)
 Phosphoric Acid
- Fertilizer Products
- Di-Ammonium Phosphate (DAP)
 Mono-Ammonium Phosphate (MAP)
- 5. Lithium Ferro-Phosphate Batteries

'One of the first ways to meet the increasing demand for food is to increase crop selsib by using fertilizers. Rising commodity prices mean that farmers are making better profits and can afford to buy fertilizers. Demand and prices are expected to grow strongly over the next decode."

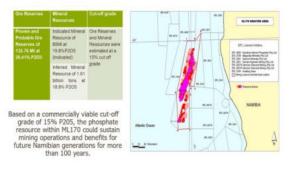
Investor Chronicle, May 9, 2011

 The designations employed and the presentation of motival in the map(s) its out imply the expression of any opinion attributes on the part of FAC concerning the legal or constitutional status of any country, feetfory or surem, or concerning the electrication.

While lithium-iron-phosphate (LFP) batteries make up only a small percentage of the specialty phosphate market, they are forecast to see continued growth. It's worth noting that LFP technology isn't new — it is one of the original battery formulas — but it was phased out in the early 2000s due to lack of efficiency.

Phosphate Outlook 2022: Geopolitics to be a Key Market Mover Georgia Williams Jan. 26, 2022 02:00PM PST

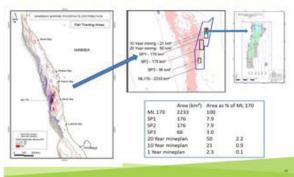
Mineral Reserves and Resources



Beneficiation Process



20 Yr Mine Plan - Scale and Perspective











Related Industrial Developments







Activities and Permitting







Public Participation



- · Public notification of the project
- · Background Information Document (BID) provided I&APs
- Public provided the opportunity to take part in the public participation process
- Direct consultation and focus group meetings with required stakeholders
- This presentation extracts information from the BID to describe the project to those attending the meeting.



Potential impacts to be assessed

- Potential impacts that can arise from the proposed project may include but are not limited to:
- . Effects on marine benthic fauna
- . Modification to the water column
- · Interference with fish behaviour
- · Implications for the commercial fishing industry
- · Implications on marine fauna
- · Job creation and skills development
- Social upliftment
- · Regional and national economic benefits
- . Others both socioeconomic and biophysical





Baseline and Impact Assessment Studies Commissioned to date

Consultants	A second	
A CONTRACTOR OF THE PARTY OF TH	San	Fisheries sealsints and mammals
D Jagsp	Capfish	Fisheries
James Gayland	Cepfish	Biomins and Stock Estimates Hanke and
	2000	Monkfish
Dr Hillika Nidjaula	Unien	Reproductive Dynamics, recruitment an
		stock dynamics
Prof Merk Gibborn	UNVC	Jellyfish
Dr Dave japp	Capfish	Seubirds and Mammals
Dr Dave japp	Capfish, MFMII	Marine Biodiversity Study
Dr Kevern Cochran	Capfish	Ecosystem assessment
Dr Dave japp	Capfish	Noise
	The state of the s	Water column and Sediments
Dr Robn Carter	Lwandle	Current Velocity and water mass
-25 (20 - 2) (CA)	77.55	Dissolved Oxygen
		Surfical Sediments
		Particulate Organic Matter concentrato
		Inorganic Nutrient Levels
		Chidative State
		Heavy Metal concentrations
		Hydrogen Sulphide
		Sediment Toxicity Study (pre-dredging)
		Benthos
Dr Nina Steffeni	Steffeni Environmental	Macrobenthus
	2.22	Plenkton
Dr Bromwyn Kirby	UNIC	Thirobacteria Study
Sebastian Brown	CSIR	Analytical methods
Dr Simon Faster	Pgysilia, UK	Meiofaurta
Or Tim McClurg	#ZN Comital Impact	Epifayne
		Plume Dispertion Modelling
Roy Van Ballengooyen	CSIR	Plume Dispertion Modelling
HIR Waltingond (UK)	HR Wallingford	Plume Dispersion Modelling Detailed
	The state of the s	Geology and Physiography
Dr John Compton	UCT	Depositional History of Phosphate
		Seabed Physingraphy and habitat





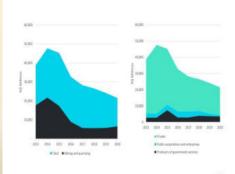
Socio Economics - Sandpiper Project

At a project level, if it were to be implemented, NMP's Sandpiper Project will:

- employ over 600 Namibians (directly and indirectly) for construction and operations in Walvis Bay
- create opportunities for SMEs and other economic sectors
 spend an estimated N\$ 1 billion on civil and local infrastructure
- spend an estimated N\$ 1 billion on civil and local infrastructure
 require a capital investment of N\$ 5.2 billion for the development
- expect an annual revenue of N\$ 4.2 billion
- . contribute direct taxes of N\$ 650 million/year
- contribute direct taxes or N\$ 650 million/yea
 contribute royalties of N\$ 78 million/year



Investment



What you can do!



- 1. Name & Surname;
- 2. Organization represented;
- Position in the organization;
- 4. Contact details and;
- Any direct business, financial, personal or other interest which you
 may have in the approval or refusal of the application.
- All initial contributions, comments and concerns must be submitted by 25th February 2022.
- Send written submissions to info@eccenvironmental.com
- · Or uploaded onto the ECC website





APPENDIX D - PUBLIC MEETING AND FOCUS GROUP MEETINGS ATTENDANCE REGISTERS

Pre-consultation meeting attendance list with Walvis Bay Salt Holdings (WBSH) held on the 4 February 2022 at 10:00.

ORGANISATION	NAME
Walvis Bay Salt Holdings (WBSH)	Andre Snyman
Walvis Bay Salt Holdings (WBSH)	Klaus Friedlingsdorf
Walvis Bay Salt Holdings (WBSH)	Thadeus Kasera
Namibia Marine Phosphate (NMP)	Chris Jordinson
Namibia Marine Phosphate (NMP)	Mike Woodborne
Environmental Compliance Consultancy (ECC)	Jessica Bezuidenhout
Environmental Compliance Consultancy (ECC)	Carlene Baufeldt
Environmental Compliance Consultancy (ECC)	Monique Jarrett



info@eccenvironmental.com www.eccenvironmental.com +264812627872 +264816531214



Meeting Attendance Register Marine venue: Namibia sclenty NAME ORGANIZATION EMALLADDRESS CONTACT NUMBER SIGNATURE Mahalle 05/3447894 ceoranscience com 225372 081 293 8081 081 350 6773 SA 08/1240882 0813998975 MEI PUBLIC PUST 081 7300975 WARDED. RDJ Consulta 08136USGE 05 12 HG 186



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leeting Attendance Register leeting Subject: - Saldo, p	er Marine Ph	sphate Mining		Date: 09/02/23
enue: Namibia				
NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1 David Russel	Confed Namib	daveling iway na	081-7205082	W Russing
11 Dalhe Gilpson		deb-rol@iway.nx	081 2413089	Topa
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Meeting	Attendance	Register
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Meeting Subject: - Sandpiper Marine Phosphate Mining

Venue: Namibia Scientific Society

	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1 /	KKAPWANGA	LLMP	ktasakawe.com	0811247249	
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Mee	ting Attendance Register				Date: 11/02/2022
Mee	ting Subject: - UMP	8 ECC FOR	cus Group Meeting	with mame	
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2	P-Kainge	MEMR	Paulus-Koing Omforgo	~ 0811490433	PKaung
3	J. Kathens	MFMR	John. Kather a refur gos		Steen
4	Moses Kalola	MAMR	mkalola@mfmi.gov.na	0812532193	Alla
5	Seating T. Shirloway	mFmk	seciliats@groail.com	0814072050	1
6	Josephine Edward	MFMR	Josephine - Edward Omfmr. gov na		Daland
7	Ania van der Plas	MFMR	ana vanderplas@infinragovina		LACO
8	Seon C. Louw	11.			
9	1		deon louw margour		9
10	Anya Wieine	MFMR	anja. Kreine & mfmr. sov. m	081 2896878	A. Weur
10	Tobias Endjauh	MFMR	Tobias Endjambiemsmrgam	08/4633427	Chipmans'
11					



	info@eccenvironmental.co
3	+264812627872
	+264816531214



Meeting Attendan Marine Phosphate Meeting Subject: - Sand pipe 1 venue: Walvis Bay SIGNATURE **EMAIL ADDRESS** CONTACT NUMBER NAME ORGANIZATION 0213998075 Public F. Hipompolea I Kotze 0813128967 Naminion Dolot Cantyn M. Hax K. +204 81 687 6461 088690638 9 10 f runca 11 NUBC Stetanmenroe 3@gmail con 22001173180 12 NBC



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	ing Attendance Register	r Marine	Phasphate Mining		Date: _[[02 202]
	e: WalvisBay	Town Ha	$\frac{1}{1}$		
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
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6	M. Savies	NMP	Menezalcenamphos.com	0 828800014	Modei
7	W- Housen	OCN	Walterhansen OO Regnoited	CS1843 9176	188
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10	Silvano Amuenje	UHC	pro whe com no		Deris
11	Malcolm Hoelsels	aHC	commo@ who.com na	08/263084	gi
12					/



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 www.eccenvironmental.com
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 +264815531214



Meeting Attendance Register

Meeting Subject: Sandplat Manine Pushase Mining

Venue: Ma Violay Town Hall

NAME ORGANIZATION EMAIL ADDRESS CONTACT NUMBER SIGNATURE

	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Pamela Nauses	Public	prayes@gmail.com	P8 06106180	Ben.
2	A Amory	OCN	ANTOINE OCNATUBIA, ORF	081 327 6834	
3	N. Dreyer	OCN	into co o cramibia org	0311697377	Ley
4	B. CURRIE	wedgendert	currie 32@gmail.com	Control of the contro	Here.
5	R. BRABY	912	radacy braby egie de	0811473518	(H)
5	D. Turbiz	Public	"ASame"	08112953-to	12
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10	Martin	NBC.	. / 1	081796489	The
11	Ester	Namelya	e broux brema@gmaila	09292495	Soft Hes
12	DAVID MUSTICIA	Alk Miss	DUNGHOUNG WHUS BAYECOLG, UA	08/127 0814	Mohing



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Meet Meet	ing Attendance Register	Marine	phosphate Mining		Date: (/ 02 / 2022
Venu	ie: Walvis Bay	Jow ~	Ital V		
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Eveline delcly	NEW EX	evaleedk@gmail.com	0812179739	EP,
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APPENDIX E - SITE NOTICES

Swakopmund Municipality



Swakopmund COSDEF Community Centre







Walvis Bay Municipality





Walvis Bay Town Hall







Windhoek public Library



