

Environmental Scoping Assessment (ESA) Study Report:

The Proposed Prospecting and Exploration Activities on Exclusive Prospecting License (EPL) No. 7047 Located south of Windhoek in the Khomas Region, Namibia - An Application for Environmental Clearance Certificate (ECC)



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Ganas Stone Processors CC


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SERJA' STATEMENT OF INDEPENDENCE

As the Appointed Environmental Consultant to undertake the Environmental Scoping Assessment (ESA) Study for Proposed Prospecting and Exploration Activities on EPL-7047 Located south of Windhoek in the Khomas Region, Serja Hydrogeo-Environmental Consultants cc declare that we:

- do not have, to our knowledge, any information or relationship with Ganas Stone Processors (the Proponent), the Ministry of Environment, Forestry and Tourism (MEFT)'s Department of Environmental Affairs and Forestry (DEAF) or the Competent Authority (Ministry of Mines and Energy (MME) that may reasonably have potential of influencing the outcome of this Environmental Assessment and the subsequent Environmental Clearance Certificate (ECC) applied for.
- have knowledge of and experience in conducting environmental assessments, the Environmental Management Act (EMA) No. 7 of 2007 and its 2012 Environmental Impact Assessment (EIA) Regulation as well as other relevant national and international legislation, guidelines, policies, and standards that govern the proposed project as presented herein.
- have performed work related to the ECC application in an objective manner, even if the results in views and findings or some of these may not be favorable to the Proponent.
- have complied with the EMA and other relevant regulations, guidelines and other applicable laws as listed in this document.
- declare that we do not have and will not have any involvement or financial interest in the undertaking/implementation of the proposed project, other than remuneration (professional fees) for work performed to conduct the ESA and apply for the ECC in terms of the EIA Regulations' requirement as an Environmental Assessment Practitioner (EAP).

Disclaimer: Serja Hydrogeo-Environmental Consultants will not be held responsible for any omissions and inconsistencies that may result from information that was not available at the time this document was prepared and submitted for evaluation.



.....
Signature:

Fredrika N. Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Date: May 2023

EXECUTIVE SUMMARY

Ganas Stone Processors CC (hereinafter referred to as the Proponent) had been granted the rights to explore on Exclusive Prospecting Licence (EPL) No. 7047 (EPL-7047) by the Ministry of Mines and Energy (MME) on the 13th of May 2019. The EPL rights have however expired on the 12th of May 2022. To renew the EPL rights, the Proponent is required to obtain an Environmental Clearance Certificate (ECC) and submit to the MME for consideration of EPL renewal as shown on the Namibia Mines and Energy Cadastre Portal ("pending renewal" <https://portals.landfolio.com/namibia/>).

Upon renewal of the EPL, the Proponent intends to prospect and explore for Base & Rare Metals, Dimension Stone, Industrial Minerals, and Precious Metals within the EPL boundaries. The EPL covers an area of 19,291.1681 hectares (ha) and located about 34km south of Windhoek in the Khomas Region.

The EPL covers some farms such as Farm Bethlehem No. 27, Kransnek No. 269, Unkenfels No. 73, Gocheganas No. 26, Krumhuk No. 30, Waldeck No. 28, and parts of Farm Aris No. 29.

Proposed Project Activities

The project will be carried out using two groups of techniques:

- Non-invasive technique (Desktop Study). During the prospecting and exploration phase, the vital components include reviewing existing reports and composite stratigraphic, lithological-geochemical maps of the targeted areas to identify prospective lithostratigraphic packages. In addition to the literature review, fieldwork (lithological (soil/rock) mapping and sampling) will be conducted to verify desktop work. These works do not require physical disturbance.
- Invasive techniques (Detailed exploration): This will entail the verification of information collected during the desktop study and survey and obtain more/detailed information about the EPL. The invasive techniques include soil sampling, trenching, and drilling.

Communication with I&APs, and Means of Consultation Employed

The ESA Study was undertaken in accordance with the EMA and its 2012 EIA Regulations. Regulation 21 of the EIA Regulations details the steps to be taken during a public consultation process and these have been used in guiding this process. Communication with I&APs with regards to the proposed development was facilitated through the following means:

- A Background Information Document (BID) containing brief information about the proposed project was compiled and hand delivered to the Ministry of Mines and Energy (MME) accompanying the ECC application, and uploaded on the MEFT (ECC) Portal for project registration and shared with registered Interested and Affected parties (I&APs).
- Project Environmental Assessment notices were published in The Namibia Media Holdings' *Market Watch* newspapers (*Allgemeine Zeitung*, *Die Republikein*, and *Namibian Sun*) dated 10 & 17

November 2022, briefly explaining the activity and its locality, inviting members of the public to register as I&APs and submit their comments/concerns.

Impact Assessment: The key negative impacts were described, assessed and appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers to avoid and/or minimize their significance on the environmental and social components. The potential negative impacts assessed have a medium rating significance, given the short-duration of prospecting and exploration. The effective implementation of the recommended management and mitigation measures accompanied by monitoring will greatly aid in minimizing the significance of adverse impacts that cannot be avoided completely (from medium rating to low). The implementation of measures to maximize the positive impacts will also increase the significance during exploration.

Conclusions

The ESA Study for the proposed exploration activities on EPL-7047 was undertaken in accordance with the EMA and its 2012 EIA Regulations. Some key potential positive and negative impacts were identified. The key negative impacts were described, assessed and appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers.

The public was consulted as required by Section 21 to 24 of the EIA Regulations by placing notices in three newspapers (*Allgemeine Zeitung, Die Republikein, and Namibian Sun*) dated 10 and 17 November 2022.

Some key potential positive and negative impacts were identified by the Environmental Consultant and based on similar project experiences.

The Scoping assessment (ESA) Study was deemed sufficient and concluded that no further detailed assessments are required to the ECC application for the exploration activities.

Serja Consultants are confident that the potential negative impacts associated with the proposed project activities can be managed and mitigated by the effective implementation of the recommended management and mitigation measures and with more effort and commitment put on monitoring the implementation of these measures.

It is therefore, recommended that the proposed prospecting and exploration activities be granted an Environmental Clearance Certificate, and provided that:

- All the management and mitigation measures provided herein are effectively and progressively implemented and monitoring.
- All required permits, licenses and approvals for the proposed activities should be obtained as required. These include permits and licenses for land access agreements, services provision agreements to explore and ensuring compliance with these specific legal requirements.

- The Proponent, their project workers or contractors comply with the legal requirements governing their project and its associated activities and ensure that project permits and or approvals required to undertake specific site activities are obtained and renewed as stipulated by the issuing authorities.
- Site areas where exploration activities have ceased are rehabilitated, as far as practicable, to their pre-exploration state. This includes the levelling of stockpiled topsoil, backfilling of exploration trenches and closing/capping of exploration holes.

To maintain the desirable rating and that the potential impacts are under control, the implementation of management and mitigation measures should be monitored by their Environmental Control Officer (ECO) and audited by an Independent Environmental Consultant on a bi-annual basis. The monitoring of this implementation will not only be done to maintain the reduce impacts' rating or maintain low rating but to also ensure that all potential impacts that might arise during implementation are properly identified in time and addressed immediately.

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Appendix B: Curriculum Vitae (CV) of the responsible Environmental Assessment Practitioner (EAP) - [uploaded separately on the Portal as required](#)

Appendix C: Draft Environmental Management Plan (EMP) - uploaded separately on the Portal as required

Appendix D: EIA Notification in the newspapers (*Allgemeine Zeitung, Die Republikein* and *Namibian Sun*) - uploaded separately on the Portal as required (under "Proof of Public Consultation" file)

LIST OF ABBREVIATIONS

Abbreviation	Meaning
AHIA	Archaeological & Heritage Impact Assessment
BID	Background Information Document
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
DEAF	Department of Environmental Affairs and Forestry
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting License
ESA	Environmental Scoping Assessment
GG	Government Gazette
GN	Government Notice
I&APs	Interested and Affected Parties
IFC	International Finance Corporation
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
NHC	National Heritage Council (NHC) of Namibia
PPE	Personal Protective Equipment
Reg	Regulation
S	Section

GLOSSARY (KEY TERMS) AS ADOPTED FROM EXCEL DYNAMIC SOLUTIONS

Term	Definition
Alternative	A possible course of action, in place of another that would meet the same purpose and need of the proposal.
Baseline	Work done to collect and interpret information on the condition/trends of the existing environment.
Biophysical	The part of the environment that does not originate with human activities (e.g., biological, physical and chemical processes).
Cumulative Impacts / Effects Assessment	In relation to an activity, means the impact of an activity that in it may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
Decision-maker	The person(s) entrusted with the responsibility for allocating resources or granting approval to a proposal
Ecological Processes	Processes which play an essential part in maintaining ecosystem integrity. Four fundamental ecological processes are the cycling of water, the cycling of nutrients, the flow of energy and biological diversity (as an expression of evolution).
Environment	As defined in Environmental Management Act - the complex of natural and anthropogenic factors and elements that are mutually interrelated and affect the ecological equilibrium and the quality of life, including – (a) the natural environment that is land, water, and air; all organic and inorganic matter and living organisms and (b) the human environment that is the landscape and natural, cultural, historical, aesthetic, economic and social heritage and values.
Environmental Management Plan (Draft EMP)	As defined in the EIA Regulations (Section 8(j)), a plan that describes how activities that may have significant environments effects are to be mitigated, controlled, and monitored.
Exclusive Prospecting Licence	A license that confers exclusive mineral prospecting rights over land of up to 1000km ² in size for an initial period of 3 years, renewable twice for a maximum of 2 years at a time.
Interested and Affected Party (I&AP)	In relation to the assessment of a listed activity includes - (a) any person, group of persons or organization interested in or affected by an activity; and (b) any organ of state that may have jurisdiction over any aspect of the activity. Mitigate - practical measures to reduce adverse impacts. Proponent – as defined in the Environmental Management Act, a person who proposes to undertake a listed activity. Significant impact - means an impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment
Fauna and Flora	The animals and plants found in an area.
Mitigation	The purposeful implementation of decisions or activities that are designed to reduce the undesirable impacts of a proposed action on the affected environment
Monitoring	Activity involving repeated observation, according to a pre-determined schedule, of one or more elements of the environment to detect their characteristics (status and trends).

Term	Definition
Proponent	Organization (private or public sector) or individual intending to implement a development proposal.
Public Consultation/Involvement	A range of techniques that can be used to inform, consult or interact with stakeholders affected by the proposed activities.
Protected Area	Refers to a protected area that is proclaimed in the Government Gazette according to the Nature Conservation Ordinance number 4 of 1975, as amended.
Scoping	An early and open activity to identify the impacts that are most likely to be significant and require specialized investigation during the EIA work. Can, also be used to identify alternative project designs/sites to be assessed, obtain local knowledge of site and surroundings, and prepare a plan for public involvement. The results of scoping are frequently used to prepare a Terms of Reference for the specialized input into full EIA.

1 INTRODUCTION

1.1 Project Background and Location

Ganas Stone Processors CC (hereinafter referred to as the *Proponent*) had been granted the rights to explore on Exclusive Prospecting Licence (EPL) No. 7047 (EPL-7047) by the Ministry of Mines and Energy (MME) on the 13th of May 2019. The EPL rights have however expired on the 12th of May 2022. To renew the EPL rights, the Proponent is required to obtain an Environmental Clearance Certificate (ECC) and submit to the MME for consideration of EPL renewal as shown on the Namibia Mines and Energy Cadastre Map Portal (“pending renewal” - as shown in Figure 1-1).

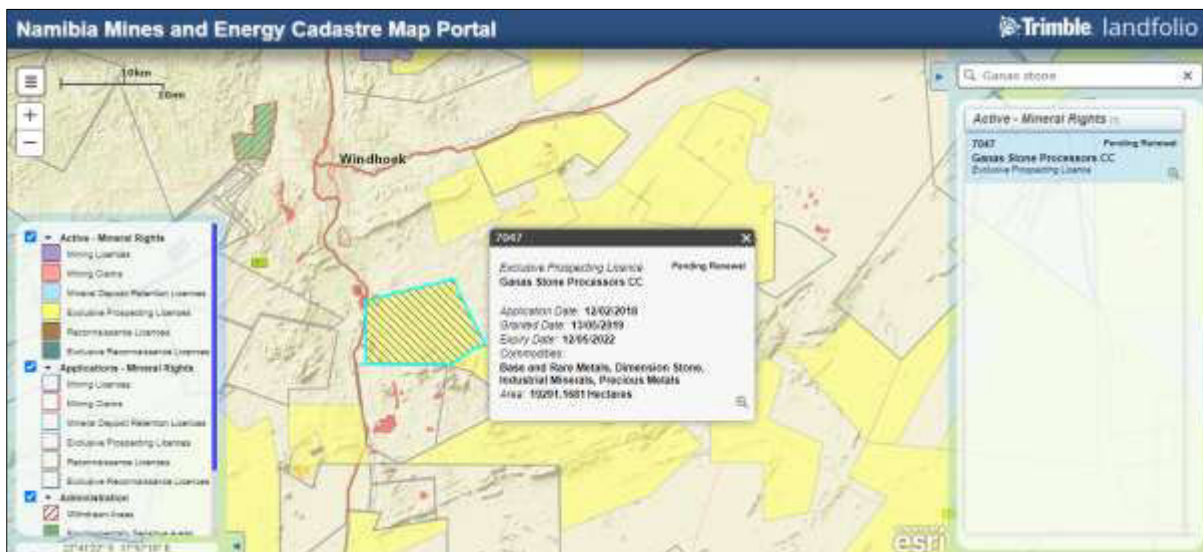


Figure 1-1: The status of EPL-7047 on the Namibia Mines and Energy Cadastre Map Portal (<https://portals.landfolio.com/namibia/>)

Upon renewal of the EPL, the Proponent intends to prospect and explore for Base & Rare Metals, Dimension Stone, Industrial Minerals, and Precious Metals within the EPL boundaries. The EPL covers an area of 19,291.1681 hectares (ha) and located about 34km south of Windhoek in the Khomas Region as shown in Figure 1-2.

The EPL covers some farms such as Farm Bethlehem No. 27, Kransnek No. 269, Unkenfels No. 73, Gocheganas No. 26, Krumhuk No. 30, Waldeck No. 28, and parts of Farm Aris No. 29. The map of the farms covered or overlain by the EPL area is shown in Figure 1-3.

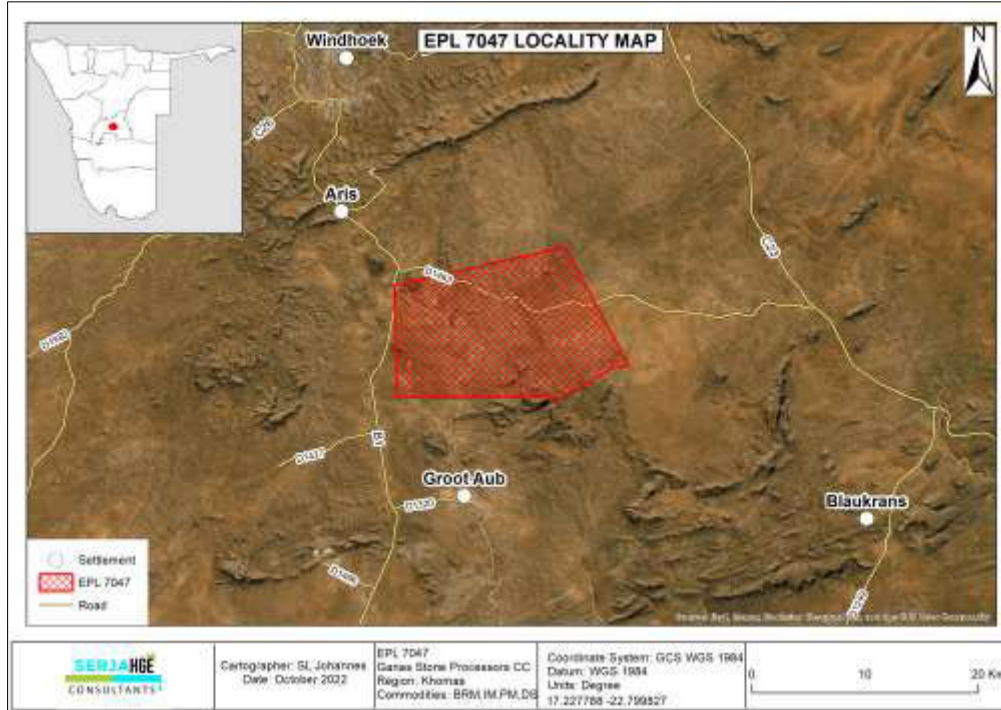


Figure 1-2: Locality Map of EPL-7047 south of Windhoek, Khomas Region

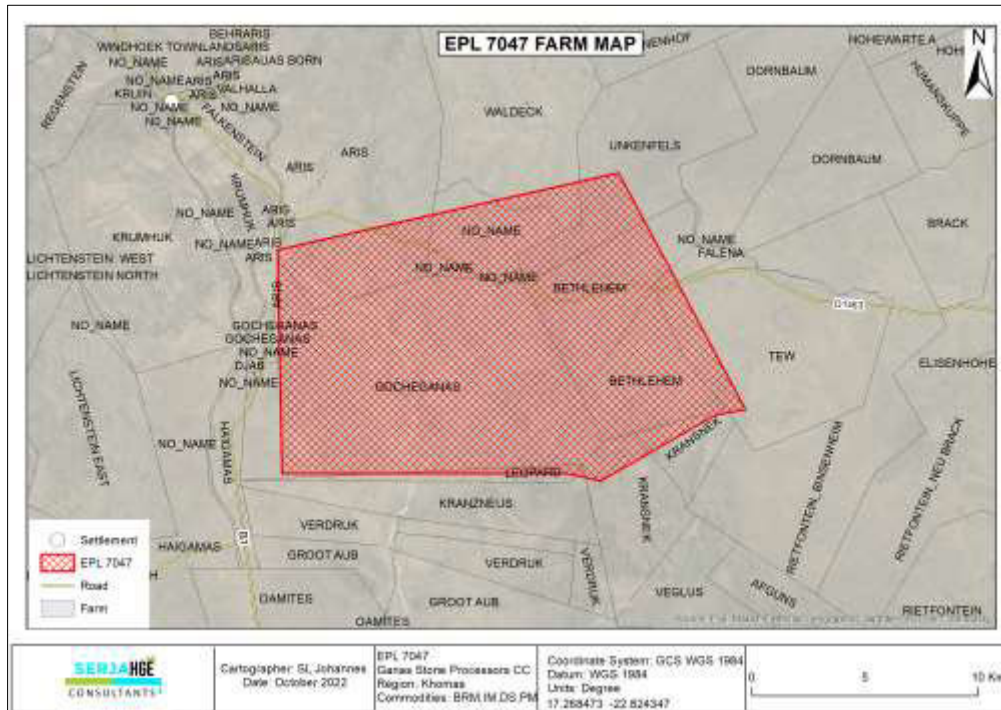


Figure 1-3: Locality Map with the farms covered by EPL-7047

The approximate coordinates of the EPL are presented in Table 1-1.

Table 1-1: GPS coordinates of EPL-7047

EPL Boundary Point	GPS Coordinates
Point A	22°46'02" S 17°7'51" E
Point B	22°44'08" S 17°15'58" E
Point C	22°49'48" S 17°19'01" E
Point D	22°49'59" S 17°18'16" E
Point E	22°51'33" S 17°15'33" E
Point F	22°51'21" S 17°14'39" E
Point G	22°51'24" S 17°7'53" E

1.2 The Need and Desirability of the Proposed Project

Mining contributes about 12.5% towards Namibia's Gross Domestic Product (GDP). The mining industry is one of the largest contributors to the Namibian economy; therefore, it contributes to the improvement of livelihoods. In Namibia, exploration for minerals is done mainly by the private sector. Exploration activities have a great potential to enhance and contribute to the development of other sectors and its activities do provide temporary employment, and taxes that fund social infrastructural development. The minerals sector yields foreign exchange and account for a significant portion of gross domestic product (GDP). Additionally, the industry produces a trained workforce and small businesses that can serve communities and may initiate related businesses. Several associated activities that are fostered include, such as manufacturing of exploration and mining equipment, provision of engineering and environmental services and others. The mining sector forms the vital part of some of Namibia's development plans, namely: Vision 2030, National Development Plan 5 (NDP5) and Harambee Prosperity Plans (HPPs) I and II (Excel Dynamic Solutions, 2021). Thus, mining is essential to the development goals of Namibia in contributing to meeting the ever-increasing global demand for minerals, and for national prosperity. Therefore, the successful exploration on EPL-7047 would then lead to the mining of economic feasible commodity(ies) based on the results of exploration, which would contribute towards achieving the goals of the national development plans. Hence, the need to undertake the proposed exploration activities on the EPL.

1.3 The Need for an ESA and Environmental Clearance Certificate (ECC)

Prospecting, exploration of and mining of mineral resources is one of the listed activities in the Environmental Impact Assessment (EIA) Regulations (2012) of the Environmental Management Act (EMA) No. 7 of 2007 that may not be undertaken without an Environmental Clearance Certificate (ECC). The activities that are relevant to proposed project activities are as follows:

- *3.1 The construction of facilities for any process or activities which require a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).*
- *3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.*
- *3.3 Resource extraction, manipulation, conservation, and related activities.*

The purpose of the ESA Study and subsequent issuance of the ECC is therefore to ensure that the proposed project activities are undertaken in an environmentally & socially friendly and sustainably manner, through the effective implementations of recommended environmental management measures to minimize the adverse identified impacts while maximizing the positive impacts.

1.4 Application for the Environmental Clearance Certificate

The application for the ECC process was done as follows:

- Prepare of prepared Background Information Document (BID) for the proposed project,
- Launching of the ECC application on the ECC Portal of the Ministry of Environment, Forestry and Tourism (MEFT) with the Proponent details (accompanied by the BID) for project registration purposes and obtaining a MEFT application / reference number (APP-00351),
- Completion of the Form 1 (Section 32) of the EIA Regulations with the required project and Proponent information,
- Submission of the printed hard copy of the ECC application (with affixed NAD 300 revenues stamps as application fees) accompanied by the BID was submitted to the MEFT on the 17th of November 2022. The MEFT's date stamped copy of the ECC application (Appendix A) was uploaded on the ECC Portal as proof of application and payment.

The next component of the ECC application was to undertake an Environmental Scoping Assessment (ESA) process, which entails Baseline Assessment of the Biophysical and Social environments as well as Public Consultation & Engagement. The findings of the ESA process are then incorporated into an ESA Report and a Draft EMP is also developed for the mitigation of potential adverse impacts anticipated from the proposed project activities. The two documents and associated documents (appendices) are then submitted to the Environmental Commissioner at MEFT's Department of Environmental Affairs and Forestry (DEAF) for evaluation and consideration of the ECC.

1.5 Appointed Independent Environmental Consultant

To comply with the EMA and its Regulations and ensure environmental management, protection, and sustainability, the Proponent appointed Serja Hydrogeo-Environmental Consultants CC, Independent Environmental Consultants to apply for the ECC and conduct the required Environmental Assessment Process, which includes Public Consultation and prepare the Environmental Assessment Report and Management Plan (EMP).

The ESA process, including public consultation and engagement as well as compilation of the associated documents were conducted and compiled by Ms. Fredrika Shagama. Ms. Shagama is a qualified and experienced Hydrogeologist and Environmental Assessment Practitioner (EAP) by training and experienced with over 7 years' experience in Groundwater and Environmental Management Consulting. Her CV is attached to this Report as Appendix B.

1.6 Scope of Work and Report Contents

This Study has been conducted according to the EMA No. 7 of 2007, and its 2012 EIA Regulations as mentioned in the preceding subsections, i.e., the proposed project may not be undertaken without an ECC. Therefore, the process has been undertaken as required and guided by the Regulations. Furthermore, the ECC is required by the MME for consideration to renew the expired EPL rights.

This Report has been compiled as a required output of an environmental assessment process after the ECC application has been submitted to the Competent Authority (MME). The ESA Report, together with the EMP and all its appendices will be submitted to the DEAF.

The document (Report) covers the following chapters or sections, in addition to the introductory chapter:

- Project description and associated activities - (Chapter 2).
- Project alternatives considered (that were found to be environmentally friendly and technically feasible) - Chapter 3).
- The Legal requirements governing the proposed project and its related activities, i.e., the legislations that the proposed project must comply with (Chapter 4).
- The Environmental and Social Baseline of the project area - Chapter 5.
- The Public Consultation & Engagement Process undertaken to inform, invite and engage the public (stakeholders and interested & affected parties) on the proposed project- Chapter 6.
- The Assessment of identified potential impacts associated with the proposed project (Chapter 7) - This chapter presents both the positive and negative (adverse) as well as cumulative impacts, assessment methodology and the assessment of the negative impacts. The mitigation measures in the form of management action plans, with timeframe and implementation responsibilities are given in Draft Environmental Management Plan (EMP) under Appendix C.
- The recommendations and conclusions to the environmental assessment are presented under **Chapter 8**. The data sources (literature/references) consulted for the assessment are listed under **Chapter 9**.

Based on the information provided by the Proponent and the EAP's experience, description of the project activities is presented under the next chapter.

2 DESCRIPTION OF THE PROPOSED PROJECT ACTIVITIES

Prior to mobilizing to site and undertaking any groundwork for the proposed activities at the site (EPL-7047), the Proponent will be required to sign land access and use agreements with the affected landowners according to Section 52 (1) (a) of the Minerals (Prospecting and Mining) Act No. 33 of 1992.

2.1 Duration of Mineral Exploration

The exploration programmes are based on an iterative, results-driven and phased nature. Therefore, it is not possible at an early stage of exploration to give exact areas for future drilling or an exact duration of the exploration activities (Resilient Environmental Solutions, 2019). Soil sampling programmes for instance may last from between one week to a month at a time over specific areas, until the explored area is fully sampled as desired. Drilling programmes may initially range from two weeks to a month at a time, depending on the planned programme or based on the results of the programme. The Proponent undertakes to work with all relevant stakeholders to keep them informed of exploration progress to facilitate site visits and access to ongoing field exploration programmes.

In general terms, the minerals exploration activities can take up to a maximum of seven years, with different projects at various stages of the exploration phase (Resilient Environmental Solutions, 2019).

The Proponent intends to adopt a systematic and standard prospecting and exploration approach for the 2 exploration categories of the commodities (Base & Rare metals, industrial minerals, Precious Metals and Dimension Stone) potentially occurring on the EPL. The exploration methods are presented under the subsections below.

2.2 Base& Rare Metals, Industrial Minerals and Precious Metals

2.2.1 Prospecting Stage (Non-Invasive Technique)

This stage of the project is known as Non-invasive technique (Desktop Study). During the prospecting and exploration phase, the vital components include reviewing existing reports and composite stratigraphic, lithological-geochemical maps of the targeted areas to identify prospective lithostratigraphic packages. In addition to the literature review, fieldwork (lithological (soil/rock) mapping and sampling) will be conducted to verify desktop work. These works do not require physical disturbance.

Upon issuance of the ECC, prospecting during the advanced exploration phase will require the Proponent to assess the EPL area through detailed geological mapping, and geophysical surveys.

2.2.1.1 Geophysical surveys

This will entail data collection of the substrata (in most cases service of an aero-geophysical contractor will be sourced), by air or ground, through sensors such as radar, magnetic and electromagnetic to detect any mineralization in the area and are conducted to ascertain the mineralisation.

Ground geophysical surveys shall be conducted, where necessary using vehicle-mounted sensors or handheld by staff members, while in the case of air surveys the sensors will be mounted to an aircraft, which then flies over the target area. These surveys (mapping and as supported by geophysics) are crucial in defining targets for test pitting, trenching, and drilling.

The exploration program will then commence with ground geophysical surveys. These surveys and associated activities are part of the exploration cycle in Figure 2-1.



Figure 2-1: The Mineral Exploration Cycle (Excel Dynamic Solutions, 2021)

After a successful exploration activity, the EPL would be converted into a Mining License by submitting exploration results and an application to convert to the MME. Upon approval of the application by MME, feasibility study and full EIA Study (with an approved ECC for mining activities), the site would be prepared for mine development and actual mining and subsequent mine closure.

2.2.2 Planned Exploration Methods (Invasive Techniques)

This stage (Detailed Field Evaluation) following the Non-Invasive techniques will be carried out by simple collection of soil and rock samples from target EPL areas to verify desktop/non-invasive information. These detailed techniques will include activities and as described under subsection:

- Soil sampling,
- Trenching, and
- Exploration drilling (Reverse Circulation (RC) and diamond drilling).

2.2.2.1 Lithology geochemical surveys

Rock and soil samples shall be collected and taken for trace element analysis to be conducted by analytical chemistry laboratories to determine if enough Base & Rare, Precious Metals or other minerals of interest are present. Also, trenches or pits may be dug depending on the commodity (in a controlled environment e.g., fencing off and labelling activity sites) adopting manual or excavator to further investigate the mineral potential.

Soil sampling consists of small pits ($\pm 20\text{cm} \times 20\text{cm} \times 30\text{cm}$) being dug where 1kg samples can be extracted and sieved to collect 50g of material. As necessary, and to ensure adequate risks mitigation, all major excavations will either be opened or closed immediately after obtaining the needed samples or the sites will be secured until the trenches or pits are closed. At all times, the landowner and other relevant stakeholder will be engaged to obtain authorisation where necessary. A typical example of soil sampling in the field for exploration is shown in Figure 2-2 below.



Figure 2-2: An example of soil sample collection and equipment (Resilient Environmental Solutions, 2019)

2.2.2.2 Detailed Exploration Drilling

Should analyses by an analytical laboratory be positive, holes are drilled, and drill samples collected for further analysis. This will determine the depth of the potential mineralization. If necessary new access tracks to the drill sites will be created and drill pads will be cleared in which to set up the rig. Two widely used drilling options may be adopted, these are either Reverse Circulation (RC) drilling and/or diamond-core drilling. RC drilling uses a pneumatic hammer, which drives a rotating tungsten-steel bit. The technique produces an uncontaminated large volume sample, which is comprised of rock chips. It is relatively quicker and cheaper when compared to other techniques like Diamond Drilling. However, diamond drilling may also be considered for this exploration programme, for better geological control and to perform processing trials.

A typical drilling site will consist of a drill-rig and support vehicles as well as a drill core and geological samples store. A drill equipment parking and maintenance yard may be set up (including a fuel and lubricants storage facility). A typical example of drilling activities on active EPLs are shown in Figure 2-3 and Figure 2-4.



Figure 2-3: A-typical drill rig on an EPL (Resilient Environmental Solutions, 2019), B- drill rig on active EPL precious metals exploration site visited by the Author in Erongo Region (photo by Author, 2022)



Figure 2-4: A drill rig on an EPL in the Omaheke Region (Resilient Environmental Solutions, 2022)

2.3 Dimension Stone Exploration

The Proponent intends to adopt a systematic prospecting approach of the following:

- Non-invasive techniques: Geological mapping, reviewing of existing geological maps and historical drilling/quarrying data, Field evaluation and sampling, and
- Invasive techniques: Detailed exploration (Down-The-Hole drilling).

The proposed activities are summarized as follows.

2.3.1 Desktop Study

The exploration program will commence with a review of geological maps and historical drilling and/ or quarrying data for the area, if any.

2.3.2 Field Evaluation

The field evaluation is to be carried out by a qualified geologist, aimed at locating suitable host rock outcrops in the field from where the:

- General soundness (intactness).
- Appearance (patterns and colour), and
- Joint and vein spacing can be evaluated.

Small samples (about 30 cm³ in dimension) will be removed for cutting and polishing to provide insights on whether the stone can be polished to an acceptable finish, as well as to give an indication of the hardness of the stone from a sawing and finishing point of view. Where field evaluation indicates a potentially economical viable deposit, detailed geological mapping will be conducted by means of mapping transversely across exposed / cleaned segments of the rock unit. Where cleaning of the rock unit is required to aid geological mapping, air compressors will be used to expose the rock. The mapping is aimed at delineating major geological structures such as fault and shear zones (zones of weakness), the extent of veins, as well as further delineation of fracture / discontinuity frequencies.

Collectively, field evaluation and detailed geological mapping will result in the production of a refined and detailed geological map for the targeted sites on the EPL.

2.3.3 Detailed Exploration

The refined geological map would then assist in target generation for subsequent detailed exploration such as drilling and possibly test quarrying.

2.3.3.1 Feasibility Study: Test Quarrying (Exploration Component)

Where exploration drilling yields positive results, test quarrying by means of butterfly cutting will be conducted. This will be done to fully evaluate the recovery of saleable blocks, and better optimize the extraction methods, production rates and operational costs in future. The exploration test quarrying will only be carried out on select targeted areas of the EPL and shall be performed on as small areas as possible to minimize environmental impacts that are associated with test quarrying. The outcomes / results of the test quarrying will be recorded and archived by the Proponent for future use (when mining will be considered depending on the outcome of exploration).

It is important to note that the test quarrying referred to above is only a component of exploration activities, to be done at a very small-scale level on targeted sites of the EPL to enable the Proponent to get sufficient and reliable exploration data, but not for mining purposes. Therefore, this ESA process and its subsequent reporting will only cover exploration activities.

2.4 Project Resources and Services Infrastructure

The following services and infrastructure as provided below will be required for the project activities.

2.4.1 Human resources

The prospecting stage will require but not limited to one or two geologists, GIS specialist, and geophysicist to collect the data. During the detailed (invasive) exploration stage, the project crew will consist of about 8 people, comprising 2 to 3 skilled (geologist and geotechnician), 2 semi-skilled, 4 or more casual workers (assistants). However, this number may vary depending on the actual workload and requirement onsite.

The workforce requirement will entail the need for geologist(s), drilling personnel, sampling team, supervisor / exploration manager, casual workers to clear the sites and perform other required jobs onsite, cleaner(s), machine operator, truck & light vehicle drivers, etc.

2.4.2 Project Crew Accommodation

Exploration workers will be housed in prefabricated accommodation units (tented camps) during the exploration stage (within the EPL boundaries). However, prior to setting up the accommodation units, an agreement and a consent will need to be reached and signed between the Proponent and the respective landowners.

The onsite accommodation is selected to ensure that the exploration crew commences with site work on time (early) and to prevent putting pressure on the local roads to transport workers to and from site daily (commuting).

2.4.3 Project Equipment, Material, Machinery and Vehicles

The following equipment and machinery will be required for the exploration stage:

- A minimum of two (4X4) pickup trucks (vehicles), and heavy truck,
- Air compressor,
- Drill rigs, and drilling machines
- Down-The-Hole (DTH) drilling rig (for Dimension Stone exploration),
- Two-way radios (for communication),
- Water supply tanks with dispersion pipelines, and fuel bowser,

- Power generators (minimum two),
- Dozer (to clear vegetation along planned drilling site access paths), and
- Biodegradable drilling fluids stored in manufacturers approved containers.

Equipment and vehicles will be stored at a designated area near the accommodation site (campsite), or a storage site established within the EPL site area.

2.4.4 Water Supply

During exploration onsite water will be required for cooling down and washing of equipment, exploration related activities such as drilling, test quarrying, domestic (drinking, cooking, and ablution). For exploration related activities such as cooking, drinking and personal use, about 300 litres of water will be required per week (1,200 litres per month). Exploration drilling, specifically diamond requires a lot of water, and it would require approximately 10,000 to 25,000 litres (10 to 25m³) per day, in instances where for example fractured formations are encountered) per hole during drilling.

To ensure that the already low potential local groundwater resources are not stressed or significantly impacted by the project activities such as drilling, the Proponent will be carting water from outside the area (where water supply is not an issue). The water will then be stored in relevant industry standard water storage tanks onsite that will be refilled as and when necessary.

It is anticipated that portable use for exploration crew (workers) will be supplied by local farm boreholes, upon reaching an agreement with the respective farmer to supply wholly or part of domestic use water.

2.4.5 Fuel supply (For Cooking)

The Proponent will provide a 10kg liquid gas cylinder to be used for food preparation by the site workers. No firewood will be collected on the farms or neighbouring land, without the owners' permission.

2.4.6 Fuel Supply (Machinery and Equipment)

Diesel will be used for machinery and equipment and fuel generator. A trailer mounted and banded 10,000-litre fuel tank will be onsite to ensure an uninterrupted fuel supply to the project activities.

2.4.7 Accessibility (roads)

The EPL is accessible from the B1 on the west and D1463 to the northern side. The site-specific areas of the EPL are then accessed via local access roads. Where necessary, and with the consent and guidance of the respective farm owner, few new access tracks will be created in some areas of the EPL to access the target sites for exploration and enable the movement of vehicles and drill rig.

2.4.8 Waste management

The onsite waste types will be managed as follows:

- Sewage: Portable ablution facilities with septic tanks will be provided on site and emptied according to manufacturers' instructions.
- General and domestic waste: Sufficient waste bins (containers) will be availed at both exploration sites and campsites for waste storage. The waste containers will be emptied into the main onsite container for disposal at the nearest approved landfill site, upon reaching a waste disposal agreement with the relevant nearest local authority such as Windhoek.
- Hazardous waste: All vehicles, machinery and fuel consuming equipment will be provided with drip trays to capture potential fuel spills and waste oils. The waste fuel/oils will be carefully stored in a standardized container to be disposed of at the nearest approved hazardous waste management facility.

2.4.9 Health and Safety

The following measures will be implemented onsite to ensure safety and security:

- Adequate and appropriate Personal Protective Equipment (PPE) will be provided to every project personnel and visitor/inspector while on and working at site and visiting the site, respectively.
- First aid: A minimum of two first aid kits will be readily available at exploration and camp sites to attend to potential minor injuries, while major injuries will need to be attended to further by transporting the injured to the nearest health centre for treatment. At least 2 personnel will be trained on administer first aid.
- Potential Accidental Fire Outbreaks: As a control measure for accidental fire outbreaks, a basic firefighting equipment, i.e., a fire extinguisher will be readily available in vehicles, at the working sites and campsite (accommodation units). The site personnel will be trained on and provided with firefighting skills.
- Open exploration trenches and boreholes: The trenches dug for sampling will be temporary fenced off to prevent potential injuries of both people and livestock and wildlife on the farms. Once sampling is completed, the trenches will be progressively backfilled and levelled and fencing removed for storage or donation to the respective landowner(s) or local/nearest communities. Similarly, for exploration holes that are no longer required after rock samples, they will be backfilled and closed off as shown on Figure 2-5.

Warning signage at hazardous site areas such as open trenches will be erected.



Figure 2-5: Fenced off exploration trenches awaiting backfilling upon completion of sampling (photos recently taken by Author at an active EPL visited by the Author)

2.5 Decommissioning and Rehabilitation of Disturbed Sites

Once the exploration activities on the EPL come to an end, the Proponent will need to put site rehabilitation measures in place. Decommissioning and rehabilitation are primarily reinforced through a decommissioning and rehabilitation plan, which consists of safety, health, environmental, and contingency aspects. The economic situation or unconvincing exploration results might force the Proponent to cease the exploration program before predicted closure. Therefore, it is of best practice for the Proponent to ensure the project activities are ceased in an environmentally friendly manner and site is rehabilitated by carrying out the following:

- Dismantling and removal of campsites and associated infrastructures from the project site and area,
- Carrying away all exploration equipment and vehicles, and
- Clean up of site working areas and transporting the recently generated waste to the nearby approved waste management facility (as per agreement with the facility operator/owner),

Further decommissioning and rehabilitation practice onsite will include:

- Backfilling of pits and trenches used for sampling,
- Closing and capping of exploration boreholes to ensure that they do not pose a risk to both people and animals in the area, and
- Levelling of stockpiled topsoil. This will be done to ensure that the disturbed land sites are left close to their original state as much as possible.

2.6 Post-Exploration Activities

After a successful exploration activity, the EPL would be converted into a Mining License by submitting exploration results and an application to the MME to convert the EPL into a Mining License. Upon pre-approval of the application by MME, feasibility study and full EIA Study (with an approved ECC for mining activities), the approved area would be prepared for mine development and actual mining and subsequent mine closure.

The next chapter is the presentation different and relevant alternatives considered for the project activities.

3 PROJECT ALTERNATIVES

Alternatives are defined as the “different means of meeting the general purpose and requirements of the activity” (EMA, 2007). This section will highlight the different ways in which the project can be undertaken and to identify the alternative that will be the most practical, but least damaging to the environment is identified.

Once the alternatives have been established, these are examined by asking the following three questions:

- *What alternatives are technically and economically feasible?*
- *What are the environmental effects associated with the feasible alternatives?*
- *What is the rationale for selecting the preferred alternative?*

The alternatives considered for the proposed project are discussed below.

3.1 The "No-Go" Alternative

The “no action” alternative implies that the status quo remains, and nothing happens. Should the proposal of exploration activities on the EPL, be discontinued, none of the potential impacts (positive and negative) identified would occur. If the proposed project is to be discontinued, the current land use for the proposed site will remain unchanged.

This option was considered and a comparative assessment of the environmental and socio-economic impacts of the “no action” alternative was undertaken to establish what benefits might be lost if the project is not implemented.

Considering the above losses, the “no-action/go” alternative was not considered a viable option for this project.

3.2 Exploration Location

The prospecting/exploration location is dependent on the geological setting (regional and local), the economic geology, as well as preference of an EPL applicant in specific commodities. Therefore, finding an alternative location for this planned exploration activities for the specific commodities in the area is not possible. This means that the mineralization of the target commodities is area-specific, which means exploration targets are primarily determined by the geology (host rocks) and the ore-forming mechanism. The location of the EPL also depend on the availability of license areas that the different applicants and Proponents applied for and interested in.

Furthermore, the national mineral resources' potential locations are also mapped and categorized by the Ministry of Mines and Energy in exclusive prospecting licenses, mining licenses and claims, mineral deposit retention licenses, reconnaissance licenses and exclusive reconnaissance licenses. Available information on EPL-7047 and other licenses are available on the Namibia Mining Cadastral Map.

3.3 Exploration Methods

Both invasive and non-invasive exploration activities as indicated under the project description chapter are expected to take place. These were found to be appropriate and reliable for the type of commodities explored for. If any other alternative viable exploration methods are found to achieve the purpose more effectively and/or efficiently without aggravating any environmental measures put in place, it can be implemented.

3.4 Services Infrastructure

Alternatives were considered for the different supporting infrastructures envisaged to ensure that the most feasible options were selected. The technological, economic, and environmental limitations were considered to select the most feasible option. The alternative considered in this regard are presented in Table 3-1 below.

Table 3-1: The presentation of service infrastructure alternatives considered for the project activities

Category of Infrastructure	Alternatives Considered	Justification for selected option
Ablution facilities	Install fixed facility with septic tank -Portable facilities with septic tank	-To minimize rehabilitation costs portable facilities were selected as the best option
Water supply	-Bring water from elsewhere -Abstract from site boreholes	-Most of the project water will be brought from elsewhere. The rest of the water will be sourced from a site borehole (if existing, and upon reaching a supply agreement with landowners). Alternatively, a new project borehole will be drilled onsite.

Category of Infrastructure	Alternatives Considered	Justification for selected option
Fuel storage	-Trailer mounted diesel tank -Fixed bunded fuel tank	-During exploration use trailer mounted diesel tank for fuel storage due to great mobility requirements during exploration.
Power supply	-Diesel generator set and if considered, solar power. -Powerline (grid) supply	-The diesel and or solar power are the most practical & economically viable options for exploration (in it ends with exploration only and money is used to set up a powerline).
Offices, accommodation	-Erect dis-mantable prefabricated units -Fixed structures	-Favoured due to: (a) Ease of installation, (b) Low installation costs and (c) Ease of dismantling & moving.
Accommodation site	-Setting up campsites tented campsite on farms within the EPL or temporary availed facilities by the farm owner(s) -Commuting from Windhoek	-It would be better to set up temporary campsites within the EPL instead of commuting to and from the site. However, this will need to be discussed and agreed upon with landowners prior to setting up facilities.

The following chapter presents the national and international legal requirements that are applicable and relevant to project.

4 APPLICABLE LEGAL FRAMEWORK

The project's activities or some of them may be regulated and governed by certain legal or policies. Therefore, it is necessary to review and consider these legislations and legal requirements. These legal requirements are either on a local (institutional), national (Namibian) and international legislation, policies, guidelines, etc. This review serves to inform the project Proponent, Interested and Affected Parties, and the decision-makers at the DEAF of the requirements and expectations, as laid out in terms of these instruments, to be fulfilled to establish the proposed prospecting and exploration activities.

4.1 Environmental Management Act No. 7 of 2007

The Environmental Management Act No.7 of 2007 and its 2012 EIA Regulations aims to ensure that the potential impacts of the development on the environment are considered carefully and in good time; that all interested and affected parties have a chance to participate in the environmental assessments and that the findings of the environmental assessments are fully considered before any decisions are made about activities which might affect the environment.

The Act aims at promoting sustainable management of the environment and use of natural resources. The Environmental Management Act (EMA) is broad; it regulates land use development through environmental clearance certification and/or Environmental Impact Assessments. The Act provides for the clearance certification for “ *mining and quarrying activities*”.

4.2 Minerals (Mining & Prospecting) Act No. 33 of 1992

The most applicable Sections to the project are as follows:

- Section 52 (1) (a) requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder.
- Section 54 requires written notice to be submitted to the Mining Commissioner if the holder of a mineral license intends to abandon the mineral license area.
- Section 68 stipulates that an application for a mineral license shall contain the particulars of the condition of, and any existing damage to, the environment in the area to which the application relates and an estimate of the effect which the proposed prospecting operations may have on the environment and the proposed steps to be taken to prevent or minimize any such effect.
- Section 91 requires that rehabilitation measures should be included in an application for a mineral license.

Implication for the proposed project: The Proponent should carry out an assessment of the impact on the receiving environment. The Proponent should include as part of their application for the EPL, measures by which they will rehabilitate the areas where they intend to carry out exploration activities.

Other applicable legal framework and policies relevant to the proposed project are presented in

Table 4-1.

Table 4-1: List of applicable legislation for the proposed prospecting and exploration activities on the EPL

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
The Constitution of the Republic of Namibia, 1990 as amended	<p>The Constitution of the Republic of Namibia (1990 as amended) addresses matters relating to environmental protection and sustainable development. Article 91(c) defines the functions of the Ombudsman to include:</p> <p>“...the duty to investigate complaints concerning the over-utilisation of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia...”</p> <p>Article 95(l) commits the state to actively promoting and maintaining the welfare of the people by adopting policies aimed at the:</p> <p>“...Natural resources situated in the soil and on the subsoil, the internal waters, in the sea, in the continental shelf, and in the exclusive economic zone are property of the State.”</p>	<p>By implementing the environmental management plan, the establishment will be in conformant to the constitution in terms of environmental management and sustainability.</p> <p>Ecological sustainability will be main priority for the proposed development.</p>
Nature Conservation Amendment Act, No. 3 of 2017	<p>National Parks are established and gazetted in accordance with the Nature Conservation Ordinance, 1975 (4 of 1975), as amended. The Ordinance provides a legal framework with regards to the permission of entering a state protected area, as well as requirements for individuals damaging objects (geological, ethnological, archaeological, and historical) within a protected area. Though the Ordinance does not specifically refer to mining as an activity within a protected area (PA) or recreational area (RA), it does restrict access to PA's and prohibits certain acts therein as well as the purposes for which permission to enter game parks and nature reserves may be granted.</p>	<p>The Proponent will be required to enhance the conservation of biodiversity and the maintenance of the ecological integrity of protected areas and other State land</p>
The Parks and Wildlife Management Bill of 2008	<p>Aims to provide a regulatory framework for the protection, conservation, and rehabilitation of species and ecosystems, the sustainable use and sustainable management of indigenous biological resources, and the management of protected areas, to conserve biodiversity and to contribute to national development.</p>	

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
Minerals (Prospecting and Mining) Act (No. 33 of 1992)	<p>Section 52(1) (a) requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder.</p> <p>Section 54 requires written notice to be submitted to the Mining Commissioner if the holder of a mineral license intends to abandon the mineral license area.</p> <p>Section 68 stipulates that an application for an exclusive prospecting license (EPL) shall contain the particulars of the condition of, and any existing damage to, the environment in the area to which the application relates and an estimate of the effect which the proposed prospecting operations may have on the environment and the proposed steps to be taken to prevent or minimize any such effect.</p> <p>Section 91 requires that rehabilitation measures should be included in an application for a mineral license.</p>	<p>The Proponent should enter into a written agreement with landowners before carrying out exploration on their land.</p> <p>The Proponent should carry out an assessment of the impact on the receiving environment.</p> <p>The Proponent should include as part of their application for the EPL, measures by which they will rehabilitate the areas where they intend to carry out mineral exploration activities.</p> <p>The Proponent may not carry out exploration activities within the areas limited by Section 52 (1) of this Act.</p>
Mine Health & Safety Regulations, 10 th Draft	<p>Makes provision for the health and safety of persons employed or otherwise present in mineral licenses area. These deal with among other matters; clothing and devices; design, use, operation, supervision, and control of machinery; fencing and guards; and safety measures during repairs and maintenance.</p>	<p>The Proponent should comply with all these regulations with respect to their employees.</p>
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	<p>Regulation 3(2)(b) states that “No person shall possess [sic] or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area”</p>	<p>The Proponent should obtain the necessary authorisation from the MME for the storage of fuel on-site.</p>
The Regional Councils Act (No. 22 of 1992)	<p>This Act sets out the conditions under which Regional Councils must be elected and administer each delineated region. From a land use and project planning point of view, their duties include, as described in section 28 “to undertake the planning of the development of the region for which it has been established with a view to physical, social and economic characteristics, urbanisation patterns, natural resources, economic development potential, infrastructure, land utilisation pattern and sensitivity of the natural environment.</p>	<p>The relevant Regional Councils are I&APs and must be consulted during the Environmental Assessment (EA) process. The project site falls under the Khomas Regional Council; therefore, they should be consulted.</p>

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
Water Act 54 of 1956	<p>The Water Resources Management Act 11 of 2013 is presently without regulations; therefore, the Water Act No 54 of 1956 is still in force:</p> <p>Prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duty of care to prevent pollution (S3 (k)).</p> <p>Provides for control and protection of groundwater (S66 (1), (d (ii)).</p> <p>Liability of clean-up costs after closure/abandonment of an activity (S3 (l)). (l)).</p>	<p>The protection (both quality and quantity/abstraction) of water resources should be a priority.</p> <p>Relevant permits and or agreements to abstract and use water should be applied for and obtained.</p>
Water Resources Management Act (No 11 of 2013)	<p>The Act provides for the management, protection, development, use and conservation of water resources; and provides for the regulation and monitoring of water services and to provide for incidental matters. The objects of this Act are to:</p> <p>Ensure that the water resources of Namibia are managed, developed, used, conserved and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (Section 68).</p>	
National Heritage Act No. 27 of 2004	<p>To provide for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.</p>	<p>The Proponent should ensure compliance with these Acts requirements. The necessary management measures and related permitting requirements must be taken.</p>
The National Monuments Act (No. 28 of 1969)	<p>The Act enables the proclamation of national monuments and protects archaeological sites.</p>	<p>This done by the consulting with the National Heritage Council of Namibia. A Chance Finds Procedure provided to the Draft EMP should be implemented upon discovery of archaeological and heritage resources.</p>
Soil Conservation Act (No 76 of 1969)	<p>The Act makes provision for the prevention and control of soil erosion and the protection, improvement and conservation of soil, vegetation and water supply sources and resources, through directives declared by the Minister.</p>	<p>Duty of care must be applied to soil conservation and management measures must be included in the EMP.</p>

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
Forestry Act (Act No. 12 of 2001)	<p>The Act provides for the management and use of forests and forest products.</p> <p>Section 22. (1) provides: "Unless otherwise authorised by this Act, or by a licence issued under subsection (3), no person shall on any land which is not part of a surveyed erven of a local authority area as defined in section 1 of the Local Authorities Act, 1992 (Act No. 23 of 1992) cut, destroy or remove - (a) vegetation which is on a sand dune or drifting sand or on a gully unless the cutting, destruction or removal is done for the purpose of stabilising the sand or gully; or (b) any living tree, bush or shrub growing within 100 m of a river, stream or watercourse."</p>	The proponent will apply for the relevant permit under this Act if it becomes necessary.
Public Health Act (No. 36 of 1919)	Section 119 states that "no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health."	The Proponent and all its employees should ensure compliance with the provisions of these legal instruments.
Public and Environmental Health Act No. 1 of 2015	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	
Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding health and safety of labourers.	
Atmospheric Pollution Prevention Ordinance (1976)	This ordinance provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, apart from East Caprivi, is proclaimed as a controlled area for the purposes of section 4(1) (a) of the ordinance.	The proposed project and related activities should be undertaken in such a way that they do not pollute or compromise the surrounding air quality. Mitigation measures should be put in place and implemented.
Hazardous Substance Ordinance, No. 14 of 1974	The ordinance provides for the control of toxic substances. It covers manufacture, sale, use, disposal and dumping as well as import and export. Although the environmental aspects are not explicitly stated, the ordinance provides for the importing, storage, and handling.	The Proponent should handle and manage the storage and use of hazardous substances on site so that they do not harm or compromise the site environment

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
Road Traffic and Transport Act, No. 22 of 1999	The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters incidental thereto.	Mitigation measures should be provided for, if the roads and traffic impact cannot be avoided, the relevant permits must be applied for.
Labour Act (No. 6 of 1992)	Ministry of Labour, Industrial Relations and Employment Creation is aimed at ensuring harmonious labour relations through promoting social justice, occupational health and safety and enhanced labour market services for the benefit of all Namibians. This ministry insures effective implementation of the Labour Act No. 6 of 1992.	The Proponent should ensure that the prospecting and exploration activities do not compromise the safety and welfare of workers.

4.3 International Policies, Principles, Standards, Treaties and Conventions

Given the fact that the proposed project is likely to be funded by international investors and the financing require the project to comply with certain requirements. Therefore, it is crucial to include the relevant legal requirements in this ESA Study and these are listed below:

- Equator Principles (EP):
 - *EP1: Review and Categorization*
 - *EP2: Environmental and Social Assessment*
 - *EP 3: Applicable Environmental and Social Standards*
 - *EP 4: Environmental and Social Management System and Equator Principles Action Plan*
 - *EP5: Stakeholder Engagement*
 - *EP6: Grievance Mechanism*
 - *EP7: Independent Review*
 - *EP8: Covenants*
 - *EP9: Independent Monitoring and Reporting*
 - *EP10: Reporting and Transparency.*
- International Finance Corporation (IFC) Performance Standards (PS):
 - *PS1: Assessment and Management of Environmental and Social Risks and Impacts*
 - *PS2: Labour and Working Conditions*
 - *PS3: Resource Efficient and Pollution Prevention and Management*
 - *PS4: Community Health and Safety*
 - *PS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement*

- *PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources*
- *PS7: Indigenous Peoples/Sub-Saharan African Historically Undeserved Traditional Local Communities*
- *PS8: Cultural Heritage*
- *PS9: Financial Intermediaries (FIs)*
- *PS10: Stakeholder Engagement and Information*
- The United Nations Convention to Combat Desertification (UNCCD) 1992
- Convention on Biological Diversity 1992
- Stockholm Declaration on the Human Environment, Stockholm (1972)

Other relevant international Treaties and Protocols ratified by the Namibian Government are:

- Convention on International Trade and Endangered Species of Wild Fauna and Flora (CITES), 1973.
- Convention on Biological Diversity, 1992, and
- World Heritage Convention, 1972.

In addition to the project description, alternatives, and legal framework, it is also important to note that the proposed project activities will be undertaken in a specific environment, in terms of biophysical and social. Therefore, understanding these existing environmental features before the project activities, is crucial for the assessment of the potential impacts stemming from the project activities on the features.

5 BIOPHYSICAL AND SOCIAL BASELINE

The proposed exploration activities will be undertaken in specific environmental and social conditions. Therefore, understanding the pre-project conditions of the environment will aid in describing the status quo versus future projections of environmental conditions once the project is implemented. The baseline information also aids in identifying the sensitive environmental features and how best suitable management and mitigation measures can be recommended for implementation. The summary of selected biophysical and social baseline information about the project area is given below.

The baseline information presented below is sourced from site visit, online sources ranging from old reports, books and publishing as well as other relevant research information in the broader area. The project baseline that is deemed necessary to the project activities are as follows.

5.1 Biological Environment

5.1.1 Fauna

In terms of fauna, the farms are homes to both domestic and wildlife. Livestock farming is practised within the EPL and surrounding areas, which comprises of goats, sheep, cattle and horses are common livestock.

5.1.2 Flora

The EPL area is found within the Dense Shrubland of the Acacia Tree and shrub Savanna as shown on the map in Figure 5-1. This vegetation type is largely characterized by large, open expanses of grasslands dotted with *Acacia* trees. The trees are tallest in areas of deeper sands in the east, with plant growth becoming progressively shrubby further west where the soils are shallower and landscape is mostly hilly and rocky (Mendelsohn, *et al* 2002).

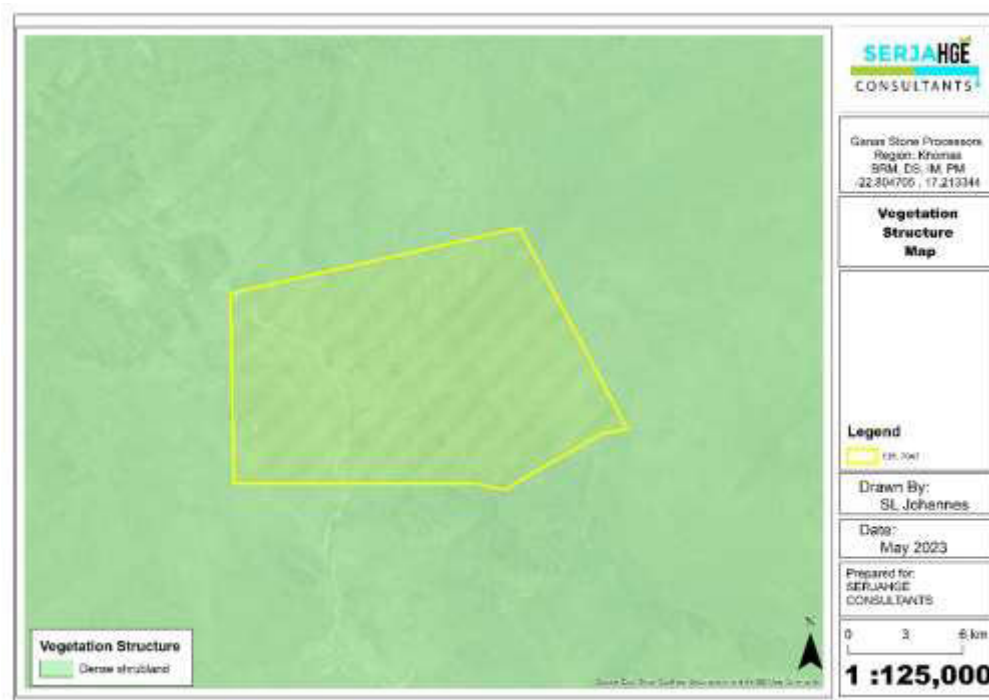


Figure 5-1: Dominant vegetation (dense shrubs) map within and around the EPL

5.2 Physical Environment

5.2.1 Climate

The climatic conditions of the area overlain by the EPL are described using the available nearest data for Windhoek obtained from Mendelsohn *et al* (2002), World Weather Online and Meteoblue websites (2023). The project area experiences annual temperatures in the range of 18 to 20°C (Mendelsohn *et al.*, 2022), maximum temperature ranging from 30 to 32°C around October to December and minimum temperatures ranging between 4 and 7°C around June/July (World Weather Online, 2023) as shown in Figure 5-2.

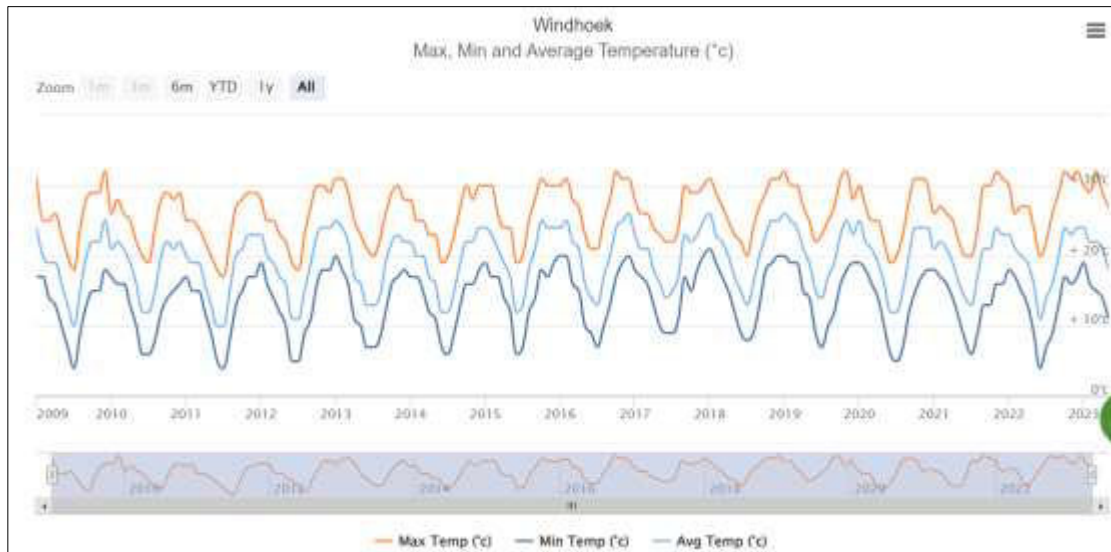


Figure 5-2: The maximum, minimum and average temperatures for Windhoek (World Weather Online, 2023)

Figure 5-3 displays the average low (6 and 7°C) around June/July and high temperatures (30°C) around October, November and December.

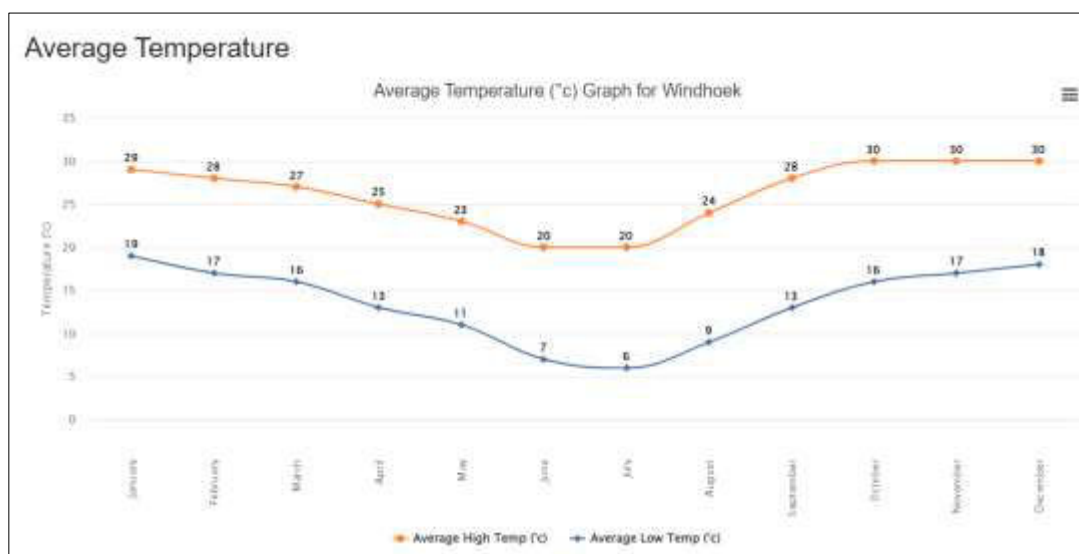


Figure 5-3: The monthly average temperatures for Windhoek area (World Weather Online, 2023)

5.2.1.1 Air and Wind

Air: The current known sources of air pollution in the area are dust emissions from unpaved district and access roads within the area, and emissions from heavy vehicles on the local roads including the D1463, particularly in dry and windy months.

The wind rose for Windhoek in Figure 5-4 below shows the wind rose and wind speed chart, indicating how many hours and days per year the wind blows from a certain direction. The dominant wind is blowing from South-West (SW) to North-East (NE)). The strong winds around the vicinity of the EPL area are experienced between April and November at an average speed ranging between 12 and 28km/h.

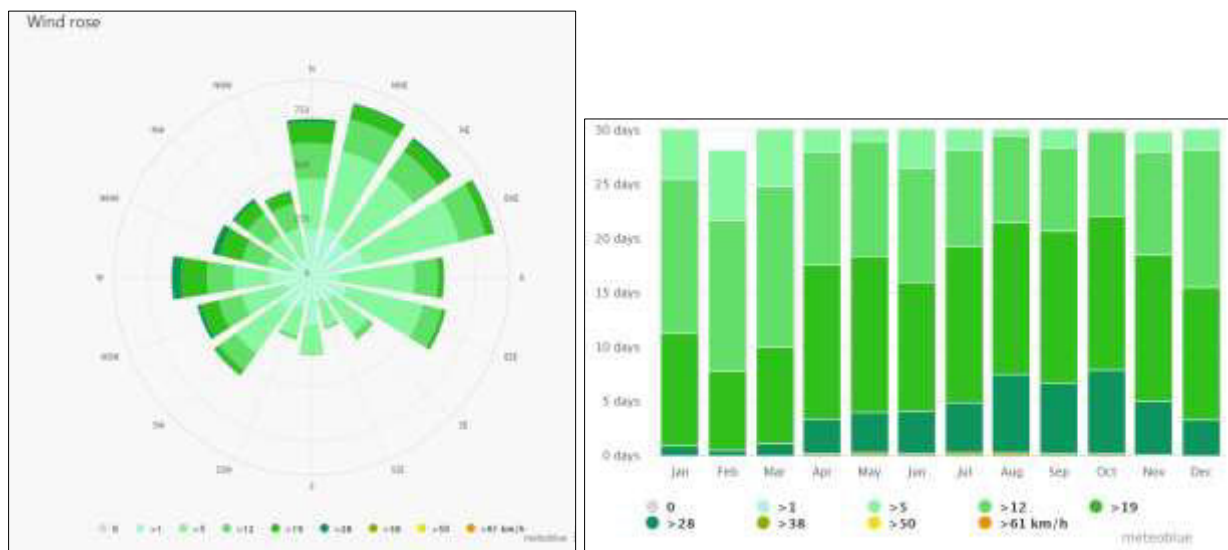


Figure 5-4: A wind rose and wind speed chart for Windhoek area (Meteoblue, 2023)

5.2.1.2 Rainfall

The project area and surrounding areas experience good rains between 300 and 400mm per year with annual average rainfall of 300 to 350mm (Mendelsohn *et al.*, 2002). According to World Weather Online (2023) annual rainfall graph (Figure 5-5.) for the 12-year period, the months of January to March experienced the highest rainfall at an average of about 350mm in 2011.

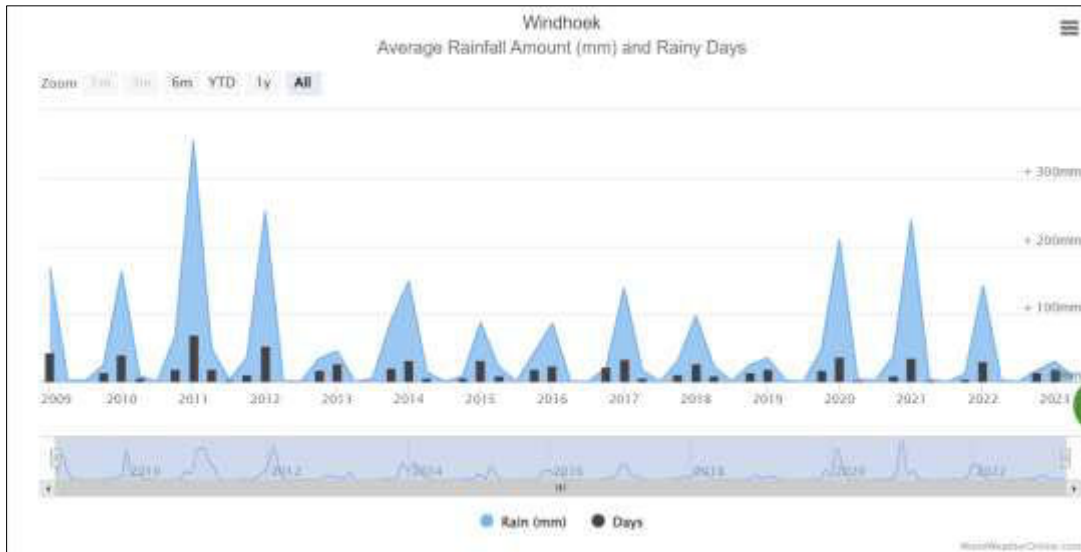


Figure 5-5: The Yearly Rainfall and Rain Days Averages for Windhoek area (World Weather Online, 2023)

The highest average rainfall was recorded in February at 177mm when it rains for 12 days, followed by January with an average rainfall of 157mm (when it also rained for 12 days) as shown in Figure 5-6.

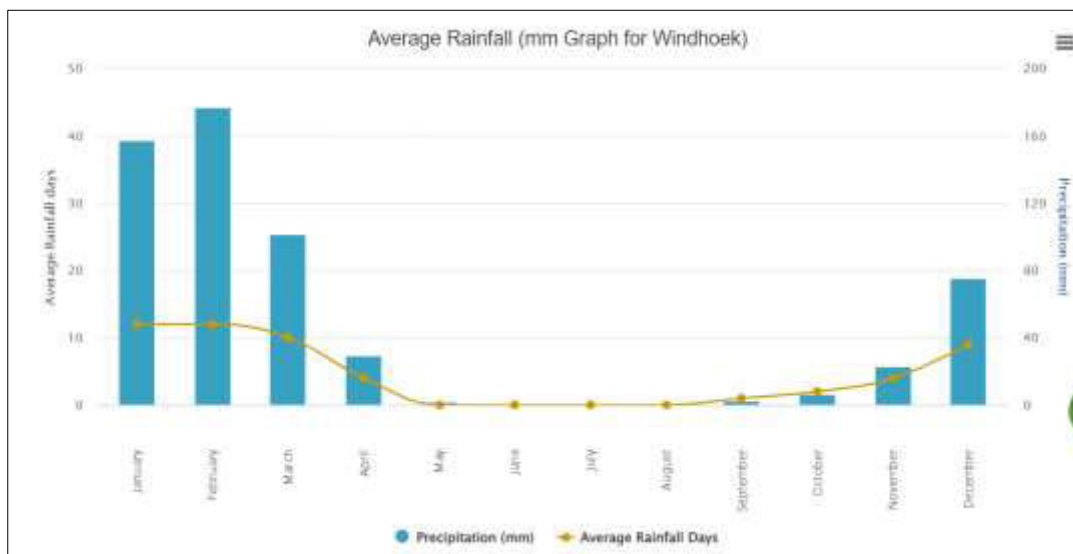


Figure 5-6: The monthly average rainfall of the Windhoek area (World Weather Online, 2023)

5.2.2 Landscape and Topography

The landscape of the EPL and Windhoek at large is referred to as the Khomas Hochland - Figure 5-7. This landscape is a deeply dissected mountainland of intermediate elevation, where the geomorphology is closely related to the underlying geology. The fracture pattern of the Kuiseb schist determines the direction of the drainage system. Westerly-flowing rivers have carved deep gorges across the Khomas Hochland, especially where they break through the Great Escarpment.

The EPL is situated in a hilly and mountainous area with elevations ranging between 1,453 and 2,559 meters above sea level as shown on topographic map in Figure 5-7.

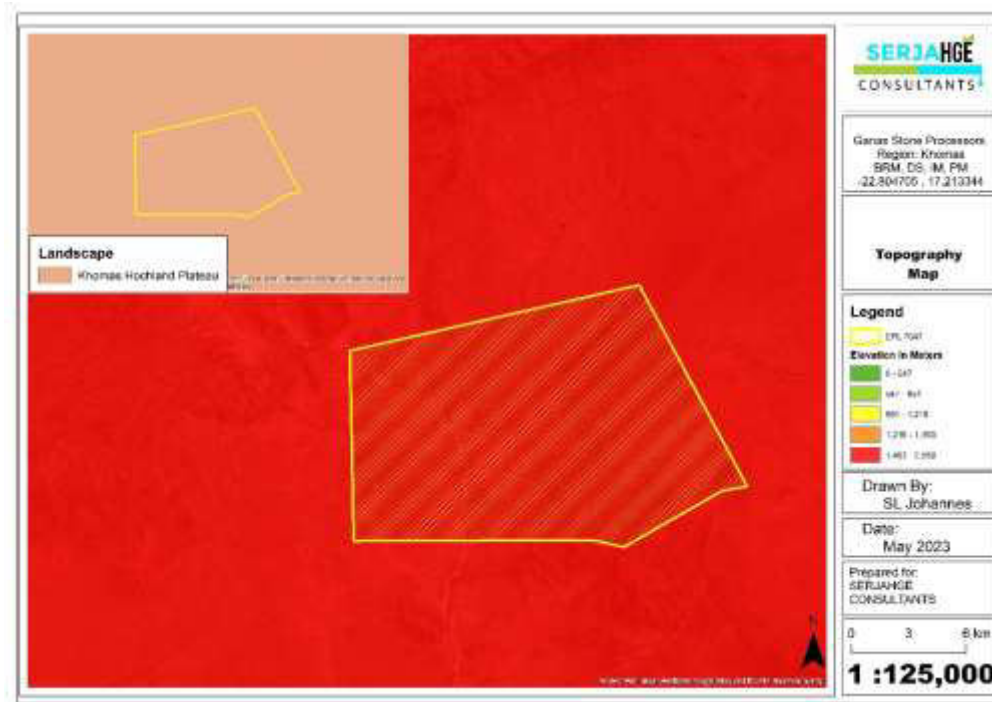


Figure 5-7: The landscape and elevation (topography) of the EPL and surrounding project area

5.2.3 Geology and Soils

The EPL geology is characterized and dominated by the Damara Sequence. This sequence underlies most of central and northern Namibia. The Damara Sequence and consist of metamorphic rocks like mica schist, traversed by micaceous quartzite, subordinate calcareous schist and impure marble, and amphibole schist that mainly characterize the Windhoek geology (Lohe *et al.*, 2021). The geological settings of the area (the rock units and their nature to potentially host ores of the sought commodities) triggered the need to prospect and explore within the EPL.

Figure 5-8 shows the local geology of the EPL, which is mainly characterized by para/orthogneiss, metasedimentary rocks, granite, metabasite dykes. Other units include quartzite, conglomerate schists, marble with alluvium, sand, gravel and calcrete.

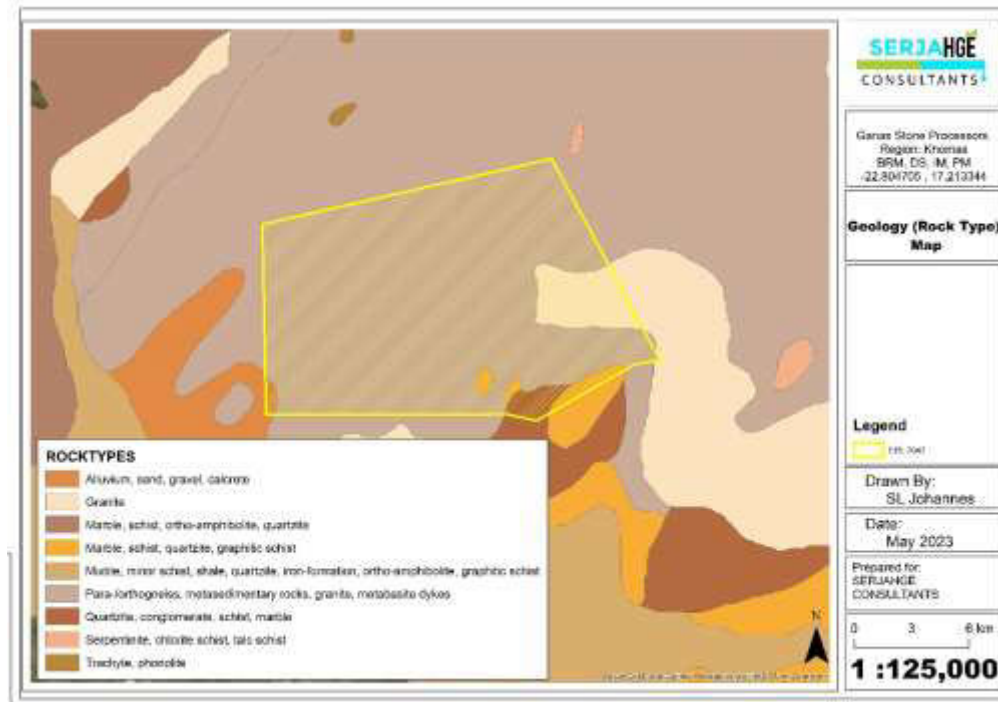


Figure 5-8: The geology of the EPL and surrounding project area

In terms of soil, EPL-7047 is covered by the Eutric Leptosols and a small portion towards the south-eastern side covered by rock outcrops as shown on the dominant soil map is shown in Figure 5-9. Mendelsohn *et al.*, (2002) described eutric soils as fertile soils with high base saturation. The second part of the soils (leptosols) means that these soils typically formed in actively eroding landscapes, especially in the hilly or undulating areas that cover much of the southern and north-western Namibia. These coarse-textured soils are characterized by their limited depths caused by the presence of continuous hard rock highly calcareous or cemented layer within 30cm of the surface. These soils are therefore, the shallowest found in Namibia and they often contain much gravel (Mendelsohn *et al.*, 2002).

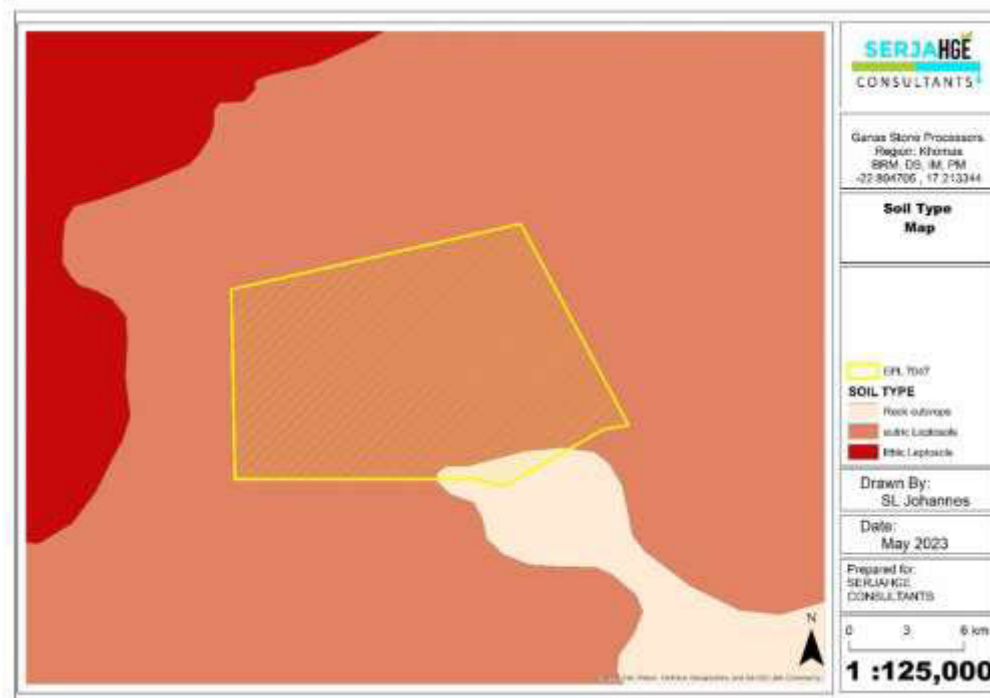


Figure 5-9: The dominant soil types found within the EPL

5.2.4 Water Resources: Groundwater (Hydrogeology) and Surface water (Hydrology)

A. Groundwater

The Windhoek area falls under the Central Namibia –Windhoek hydrogeological; the Hochfeld-Dordabis-Gobabis hydrogeological; and Stampriet hydrogeological region. The quartzite aquifers in the Windhoek area are classified as high yielding. Windhoek’s groundwater system is defined by its unique source known as “The Windhoek Aquifer”, which is developed in an area that exhibits numerous north to north-west striking faults and extensive jointing from the major groundwater conduits. The Windhoek Aquifer is located to the south of the City of Windhoek area. According to Christelis et al., (2018), the Aquifer is semi-confined with piezometric levels varying from 8 to 150m below ground level. The borehole depths vary from 100 to 400m. The recharge to fractured aquifers, such as the Windhoek aquifer, commonly takes place by direct infiltration of rainfall into exposed fractures in outcropping areas (of quartzite outcrops), or areas where there is limited soil cover.

The secondary porosity and permeability of the Aquifer is best developed in faults with post-hydrothermal alteration and brecciation within the quartzite - secondary permeability is much more poorly developed in the associated schist. However, in other areas of the region, the larger settlements obtain water by surface water storage in dams or from alluvial aquifers, while the potential of bedrock aquifers is very limited (Christelis et al., 2018).

The EPL is covered by the rock bodies with little groundwater potential as shown on the map in Figure 5-10.

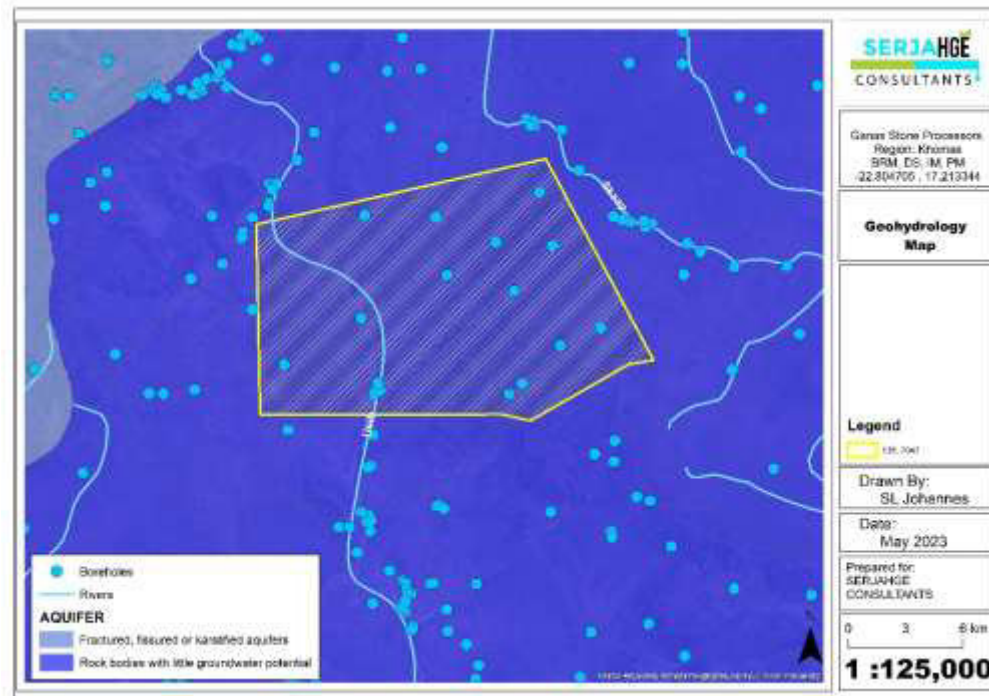


Figure 5-10: The surface and groundwater map of the EPL area

A. Surface Water

Windhoek is in a semi-arid region with a mean annual precipitation of approximately 350-450 mm. Although there are a number of drainage lines and riverbeds in the region, almost all of these rivers and streams are non-perennial, containing water only during the rainy season. The surface run-off in the study area flows mainly from the south to the north over the site due to higher mountainous areas occurring in the southern and eastern regions of the study area. The general topography of the land, with the city falling within a valley, forms a natural catchment basin where all the water is collected and from which it is transported to the north (City of Windhoek, 2006). Two dams are located in the study area, namely the Goreangab Dam in the central region and the Avis Dam in the south-eastern region of the study area.

The Usip ephemeral river crosses the EPL to the west as shown in the geohydrology map above.

B. Aquifer Vulnerability to Pollution

In terms of groundwater vulnerability risk to pollution, this is assessed based on aquifer type, groundwater flow, depth to groundwater and annual recharge (Struckmeier and Van Wyk, 2001). The City areas that are underlain by low potential groundwater rock bodies have a moderate vulnerability to pollution status as shown on the map in Figure 5-11. This status could be explained by the absence of fractured/faulted bedrocks that would hinder or minimize the spreading of potential pollutants from the ground surface into groundwater systems.

The groundwater vulnerability to pollution could be explained by the fractured nature of the bedrocks/rock formations that underlie the area as well as major surface water bodies such as rivers and riverbeds. Therefore, the types of formations and areas (rivers) could provide ready pathways for pollution transport (fast spreading of polluted water), if any pollution escape from the surface into the ground owing to developmental activities such as the poor handling of different pollutants such as hazardous substances (hydrocarbons) and wastewater.

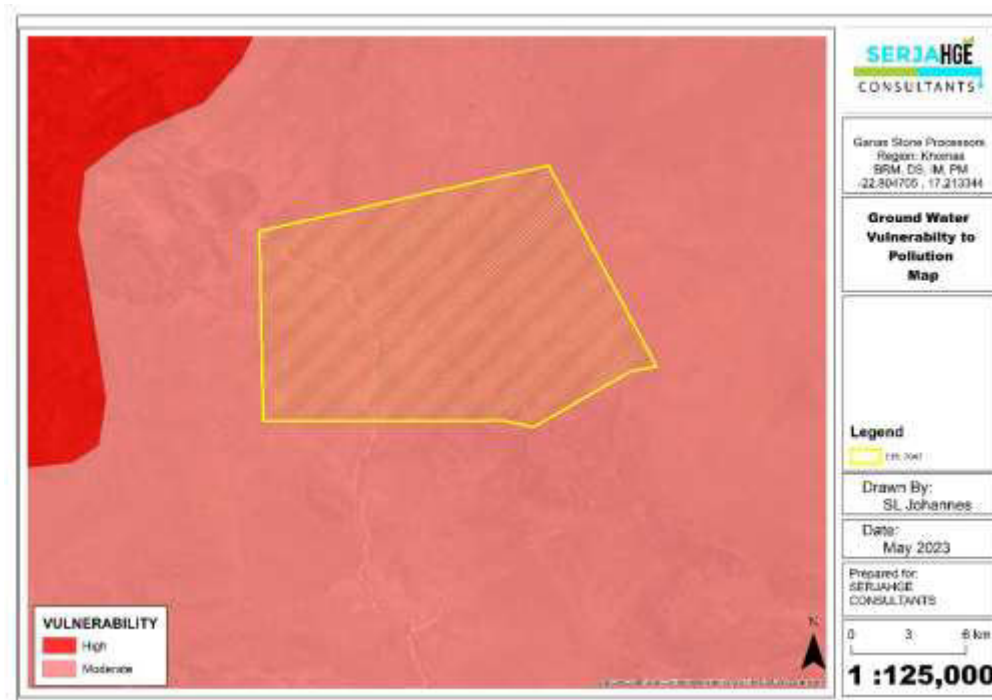


Figure 5-11: The Aquifer Pollution vulnerability of the EPL area

5.3 Social and Economic Environment

5.3.1 Demography

The Khomas Region has a population of 342,141 (172,469 females and 169,672 males) (Namibia Statistics Agency (NSA), 2014).

The EPL falls within the Windhoek Rural Constituency and in 2011, the Constituency had a population of 22,254 (10,167 females and 12,087 males).

5.3.2 Economic Activities

According to the Khomas Regional Council (2015), activities in the Khomas region are centered on Windhoek, the country's administrative, legislative, judicial and financial capital. The majority of larger companies and corporate active in Namibia have their head offices situated in Windhoek. This makes

Windhoek the nerve centre for most economic activities throughout the country. Windhoek accommodates most of Namibia's light industries and manufacturing. The main economic activities in the Region range from Trade & industry, tourism (the Hosea Kutako International Airport being the gateway), agriculture, wildlife, mining and forestry (in private lands most management is oriented towards grazing for livestock and game).

The Population & Housing Census in 2011 indicated that the labour force in the Constituency was 75% (15+ years), with the employed at 59%, and unemployed at 16%. About 18% were outside the labour force, which comprised students (6%), homemaker (3) and the retired, too old, etc. (9%) (NSA, 2014).

The main source of household income in the Constituency were from farming (7%), wages and salaries (67%), cash remittance (3%), business (non-farming) amounting to 8% and pension at 10% (NSA, 2014).

5.3.3 Archaeology and Heritage

From a local context, there are no recorded nor mapped archaeological and heritage resources (sites and objects) within the EPL. In a broader area, there one archaeological site as recorded in the National Heritage Council database located about 2-3km on the southwestern corner of the EPL (Figure 5-12).

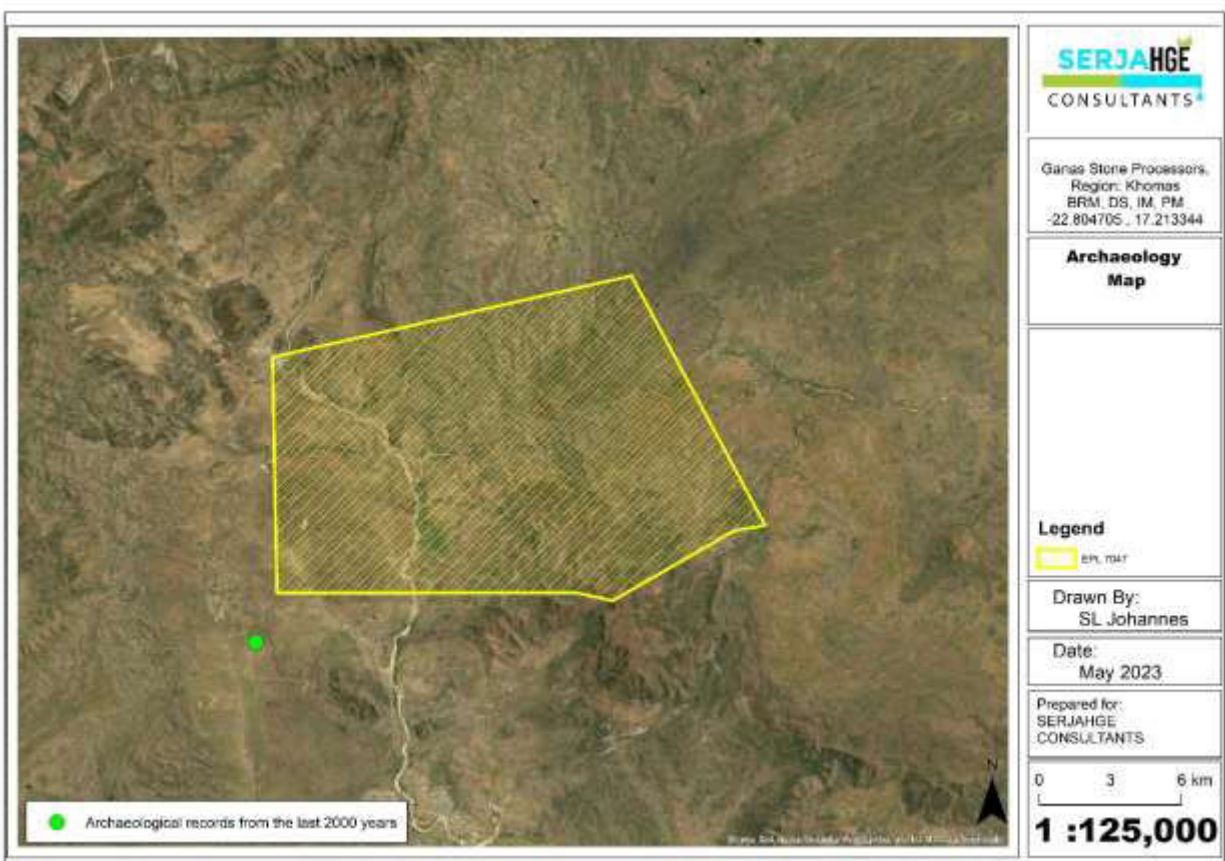


Figure 5-12: The archaeological map of the EPL area

The public consultation and engagement process and means employed for the EPL ESA Study is presented under Chapter 6.

6 PUBLIC CONSULTATION AND PARTICIPATION PROCESS

Public consultation and participation form an important component of an EIA process. It provides potential Interested and Affected Parties (I&APs) and stakeholders with an opportunity to comment on and raise any issues relevant to the project for consideration as part of the assessment process. This greatly assist the EAP (Environmental Consultant) to thoroughly identify and record potential impacts and to what extent further investigations are necessary.

Public consultation can also aid in the process of identifying possible mitigation measures. The consultation for this project has been done under the EMA and its EIA Regulations and as per the following subsections.

6.1 Pre-identified and Registered Interested and Affected Parties (I&APs)

Relevant and applicable national, regional, and local authorities, and other interested members of the public were identified. Pre-identified I&APs were contacted directly, while other parties who contacted the Consultant after project advertisement notices in the newspapers, were registered as I&APs upon their request.

6.2 Communication with I&APs, and Means of Consultation Employed

Regulation 21 of the EIA Regulations details the steps to be taken during a public consultation process and these have been used in guiding this process. Communication with I&APs with regards to the proposed development was facilitated through the following means:

- A Background Information Document (BID) containing brief information about the proposed project was compiled and hand delivered to the Ministry of Mines and Energy (MME) accompanying the ECC application, and uploaded on the MEFT (ECC) Portal for project registration and shared with registered Interested and Affected parties (I&APs).
- Project Environmental Assessment notices were published in The Namibia Media Holdings' *Market Watch* newspapers (*Allgemeine Zeitung, Die Republikein, and Namibian Sun*) dated 10 & 17

November 2022, briefly explaining the activity and its locality, inviting members of the public to register as I&APs and submit their comments/concerns. Adverts are attached as Appendix D.

6.3 Feedback and Issues from Interested and Affected Parties

The public consultation which entailed the submission of comments and registration as I&APs started on the 10th of November 2022 until the 09th of December 2022. However, the Consultant left an open line for further comments throughout December 2022.

Apart from a request for the BID by one I&AP, there were no comments submitted to Serja Consultants on this ESA process.

The following chapter is a presentation of the identified impacts, their description, assessment methodology, and assessment.

7 IMPACTS IDENTIFICATION, ASSESSMENT AND MEASURES

7.1 Identification of Potential Impacts

The proposed project and its associated activities are usually associated with different potential positive and negative impacts. For an environmental assessment, the focus is placed mainly on the negative impacts that are likely to affect the host environmental and social features. The assessment is done to ensure that these impacts are sufficiently addressed, and adequate mitigation measures are recommended thereto for implementation so that an impact's significance is brought under control, while maximizing the positive impacts. The potential positive and negative impacts that have been identified from the prospecting activities are listed as follow:

Positive impacts:

- Local socio-economic development through temporary employment creation,
- Payment of land access and use fees, this will also include payment of rental fees for setting up structures such as campsites and storage of exploration samples onsite (if necessary),
- Improving certain services on the farms such as donation of water boreholes for exploration holes in which water is encountered during drilling (after completion of exploration works in such holes). This will also include installing new gates at utilized farm sections with small gates (to gain access to such areas) and the old gates needs to be removed (to enable easy access for heavy machinery), and

- Procurement of local goods and services for exploration

Negative:

- Potential disturbance of grazing areas,
- Physical land / soil disturbance
- Impact on local biodiversity (fauna and flora); potential illegal harvesting of protected vegetation and wildlife hunting (poaching) and habitat disturbance in the area, as well as livestock theft.
- Potential impact on water resources and soils particularly due to pollution,
- Visual impact from unrehabilitated explored areas on the EPL may pose as an eyesore to travellers (including tourists) using the B1 and D1463 road.
- Air quality issue: potential dust generated from the project activities such as drilling, possibly trenching and movement of heavy trucks on unpaved access roads.
- Potential occupational & social health and safety risks (trenches and drilled holes risk to livestock, game and people).
- Accidental fire outbreaks related to the project activities.
- Vehicular traffic safety and impact on services infrastructure such as local roads
- Vibrations and noise associated with drilling activities may be a nuisance to locals.
- Environmental pollution (solid waste and wastewater).
- Archaeological and heritage resources impact (during trenching and drilling)
- Potential social nuisance and conflicts (theft, damage to properties, etc.).

7.2 Impact Assessment Methodology

The Environmental Assessment process primarily ensures that potential impacts that may occur from project activity are identified and addressed with environmentally cautious approaches and legal compliance. The impact assessment method used for this project is in accordance with Namibia's Environmental Management Act (No. 7 of 2007) and its Regulations of 2012, as well as the International Finance Corporation (IFC) Performance Standards.

The identified impacts were assessed in terms of scale/extent (spatial scale), duration (temporal scale), magnitude (severity) and probability (likelihood of occurring), as presented in Table 7-1.

To enable a scientific approach to the determination of the environmental significance, a numerical value is linked to each rating scale. This methodology ensures uniformity and that potential impacts can be addressed in a standard manner so that a wide range of impacts are comparable. It is assumed that an assessment of the significance of a potential impact is a good indicator of the risk associated with such an impact. The following process will be applied to each potential impact:

- Provision of a brief explanation of the impact,
- Assessment of the pre-mitigation significance of the impact; and
- Description of recommended mitigation measures.

The recommended mitigation measures prescribed for each of the potential impacts contribute towards the attainment of environmentally sustainable operational conditions of the project for various features of the biophysical and social environment. The following criteria (in Table 7-1) were applied in this impact assessment:

Table 7-1: Criteria used for impact assessment (extent, duration, intensity and probability)

The Criteria used to assess the potential negative impacts				
Extent or (spatial scale) - extent is an indication of the physical and spatial scale of the impact.				
Low (1)	Low/Medium (2)	Medium (3)	Medium/High (4)	High (5)
Impact is localised within the site boundary: Site only	Impact is beyond the site boundary: Local	Impacts felt within adjacent biophysical and social environments: Regional	Impact widespread far beyond site boundary: Regional	Impact extend National or over international boundaries
Duration- Duration refers to the timeframe over which the impact is expected to occur, measured in relation to the lifetime of the project				
Low (1)	Low/Medium (2)	Medium (3)	Medium/High (4)	High (5)
Immediate mitigating measures, immediate progress	Impact is quickly reversible, short-term impacts (0-5 years)	Reversible over time; medium term (5-15 years)	Impact is long-term	Long term; beyond closure; permanent; irreplaceable or irretrievable commitment of resources
Intensity, Magnitude / severity - Intensity refers to the degree or magnitude to which the impact alters the functioning of an element of the environment. This a qualitative type of criteria				
H-(10)	M/H-(8)	M-(6)	M/L-(4)	L-(2)

The Criteria used to assess the potential negative impacts				
Very high deterioration, high quantity of deaths, injury of illness / total loss of habitat, total alteration of ecological processes, extinction of rare species	Substantial deterioration, death, illness or injury, loss of habitat / diversity or resource, severe alteration, or disturbance of important processes	Moderate deterioration, discomfort, partial loss of habitat / biodiversity or resource, moderate alteration	Low deterioration, slight noticeable alteration in habitat and biodiversity. Little loss in species numbers	Minor deterioration, nuisance or irritation, minor change in species / habitat / diversity or resource, no or very little quality deterioration.
Probability of occurrence - Probability describes the likelihood of the impacts occurring. This determination is based on previous experience with similar projects and/or based on professional judgment				
Low (1)	Medium/Low (2)	Medium (3)	Medium/High (4)	High (5)
Improbable; low likelihood; seldom. No known risk or vulnerability to natural or induced hazards.	Likely to occur from time to time. Low risk or vulnerability to natural or induced hazards	Possible, distinct possibility, frequent. Low to medium risk or vulnerability to natural or induced hazards.	Probable if mitigating measures are not implemented. Medium risk of vulnerability to natural or induced hazards.	Definite (regardless of preventative measures), highly likely, continuous. High risk or vulnerability to natural or induced hazards.

7.3 Impact Significance

Impact significance is determined through a synthesis of the above impact characteristics. The significance of the impact “without mitigation” is the main determinant of the nature and degree of mitigation required. As stated in the introduction to this chapter, for this assessment, the significance of the impact without prescribed mitigation actions was measured.

Once the above factors (Table 7-1) have been ranked for each potential impact, the impact significance of each is assessed using the following formula:

$$\text{SP} = (\text{magnitude} + \text{duration} + \text{scale}) \times \text{probability}$$

The maximum value per potential impact is 100 significance points (SP). Potential impacts were rated as high, moderate, or low significance, based on the following significance rating scale (Table 7-2).

Table 7-2: Impact significance rating scale

Significance	Environmental Significance Points	Colour Code
High (positive)	>60	H

Significance	Environmental Significance Points	Colour Code
Medium (positive)	30 to 60	M
Low (positive)	<30	L
Neutral	0	N
Low (negative)	>-30	L
Medium (negative)	-30 to -60	M
High (negative)	>-60	H

For an impact with a significance rating of high, mitigation measures are recommended to reduce the impact to a low or medium significance rating, provided that the impact with a medium significance rating can be sufficiently controlled with the recommended mitigation measures. To maintain a low or medium significance rating, monitoring is recommended for a period to enable the confirmation of the significance of the impact as low or medium and under control.

The assessment of the project phases is done for both pre-mitigation (before implementing any mitigation) and post-mitigation (after mitigations are implemented). The objective with the mitigation measures is to firstly avoid the risk and if the risk cannot be avoided, mitigation measures to minimize the impact are recommended. Once the mitigation measures have been applied, the identified risk will be of low significance.

7.4 Description and Assessment of Potential Impacts

The potential impacts from the proposed project activities are described, and assessed in Table 7-3. The management and mitigation measures are in a form of management action plans are provided in the Draft EMP.

Table 7-3: The Description and Assessment of the impacts of exploration activities on the biophysical and social environment

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
Positive Impacts											
Employment creation	Although temporary, the project activities will create employment to some locals from sampling throughout to drilling. This will include casual labourers, technical assistants, cooks, etc.	L / M-2	L / M - 2	L / M - 4	L - 1	L - 8	M / H - 4	H - 5	M - 6	H - 5	H - 75
Land access use fees to farmers for socio-economic development	Payment of land use fees to the farmers in accordance with the Mining Act would generate an income for their farms and families during exploration duration.	L / M-2	L / M - 2	L / M - 4	L - 1	L - 8	M / H - 4	H - 5	M - 6	H - 5	H - 75
Empowerment of local businesses	Procurement of local goods and services (such as site clearing, cleaning, etc.) by local business will promote local entrepreneurship empowerment and local economic development (income generation).	L / M-2	L / M - 2	L / M - 4	L / M - 2	L - 16	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44
Donating of water boreholes	During drilling, it is likely that groundwater would be encountered in some exploration	L / M-2	L / M - 2	L / M - 4	L - 1	L - 8	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
from exploration and drilling and improving some farm infrastructure s	<p>holes. Therefore, the Proponent will notify the farmer and boreholes donated to respective farmer(s) for their own use.</p> <p>Where access needs to be improved, such as farm sections areas with small gates for some exploration vehicles and machinery, new gates will be installed by the Proponent, with the farmer's consent.</p>										
Negative (Adverse) Impacts											
Disturbance to grazing areas on the EPL	<p>The EPL is overlying commercial farms that practice livestock and game farming, therefore, the invasive exploration activities such as site clearing, trenching, and drilling can potentially lead to the disturbance of grazing land. This will potentially affect the grazing areas available to the farms' livestock and wildlife, and since the farmers greatly depend on these types of farming for subsistence and commercial purposes (income generation), this would have an impact on their livelihood through potential grazing for animals.</p>	M: -3	M: -3	M: -6	M / H: 4	M: -48	L / M: -2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	Losing grazing pastures for livestock and wildlife minimizes the number of animals on the farms and overall farming activity in the area, and lead to loss of livelihoods. However, the preliminary exploration target areas for exploration will be focusing towards the western bottom corner of the EPL, therefore, most of the EPL area will be undisturbed.										
Physical disturbance to the site soils	The excavations and land clearing to enable siting of project structures and equipment will potentially result in soil disturbance which will leave the site soils exposed to erosion. This impact would be probable at site areas with no to little vegetation cover to the soils in place. The movement of heavy vehicles. The movement of heavy vehicles and equipment may lead to compaction of the soils during exploration. This will, however, be a short-term and localized impact.	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44	L / M - 2	L / M - 2	L / M - 4	L / M - 2	L - 16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
Impact on Biodiversity: Wild Fauna and Flora	<p><u>Fauna</u>: The EPL falls within an ecologically sensitive area. Therefore, if activities such as trenching and drilling activities are not carefully conducted, this would result in land degradation. The degradation would lead to habitat loss for a diversity of flora and fauna onsite. However, exploration activities will be limited specific target areas only within the EPL.</p> <p>The presence and movement of the exploration workforce and operation of project equipment and heavy vehicles would disturb not only the domestic animals (livestock) grazing at the explored sites of the EPL, but also the wildlife present on the farms. Not only the disturbance due to human and vehicle movements, but also potential illegal hunting (poaching) of local wildlife by project related workers. This could lead to loss or number reduction of specific faunal species which also</p>	M: -3	M: -3	M: -6	M / H: 4	M: -48	L / M: -2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	<p>impacts tourism in the community.</p> <p><u>Flora:</u> Vegetation would be impacted through clearing to create exploration access roads, setting up project equipment and infrastructures, and actual exploration activities such as drilling, trenching and quarrying.</p> <p>Drilling activities may potentially impact vegetation through the fallout dust settling on the leaves of the plants, hindering, or preventing photosynthesis, which eventually affects the grazing of herbivores on the farms. The clearing of vegetation, where deemed necessary will be limited to the specific route and minimal, therefore, the impact will be localized, site-specific, therefore manageable.</p>										
Air Quality: Dust Generation	There is a potential impact of dust emanating from site access roads when transporting exploration equipment and supply to and from site. This may compromise the air quality in the	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	area. Additionally, activities carried out as part of the exploration works such as drilling would contribute to the dust levels in the air.										
Visual impact: Scenic view of the area for Tourism	<p>Exploration activities, particularly for Dimension Stone usually leave scars on the local landscape. This is bound to happen when the exploration sites are located close to or along roads or frequented areas, and these scars in many cases contrasts the surrounding landscape and thus may potentially become a visual nuisance, especially in tourist-prone areas such as the EPL area. The sight of the explored and unrehabilitated areas of the EPL may be an eyesore to both locals, tourists and travelers alike on B1 and D1463.</p> <p>The tourists and motorists/travellers on the B1 and D1463 would be impacted, if Dimension Stone activities are undertaken on the EPL side overseeing the road. The</p>	M - 3	M - 3	M - 6	M / H - 4	M - 48	L / M: - 2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	<p>eyesore associated with Dimension Stone is mainly associated with white marble exploration and or mining, given its distinctive color from the host environment compared to dark or black granites and dolerites on EPL-7047.</p> <p>This impact is considered minimal as only small blocks of the stone will be extracted for analysis as part of exploration.</p>										
Water Resources Demand and Use	<p>The abstraction of more water than it can be replenished from low groundwater potential areas would negatively affect wildlife watering in the area that depend on the same low potential groundwater resource (aquifer). The impact of the project activities on the resources would be dependent on the water volumes required by each project activity. Commonly exploration activities use a lot of water, mainly diamond drilling (for Base & Rare, Industrial Minerals, and Precious Metals) that is more water-consuming</p>	M - 3	M - 3	M - 6	M / H - 4	M - 48	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	<p>compared to other techniques like reverse circulation. The amount of water required for diamond drilling would be 10,000 to 25,000 litres (10 to 25 m³) per day per hole. Given the fact that the EPL area is underlain by rock units with low groundwater potential, the Proponent will be carting water for drilling from outside the area and store it in industry standard water reservoirs/tanks on site and refilled as required. The required water would also be dependent on the duration of the exploration works and number of exploration holes required to make reliable interpretation on the commodity presence explored for during exploration. Therefore, the impact will only last for the duration of the exploration activities and ceases upon their completion.</p>										
Soil and Water Resources Pollution	<p>The proposed exploration activities are associated with a variety of potential pollution sources (i.e., lubricants, fuel, and wastewater) that may</p>	M: -3	M: -3	M: -6	M / H: 4	M: -48	L / M: -2	L / M: -2	L / M: -4	L / M: 2	L: -16

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	<p>contaminate/pollute soils and eventually groundwater and surface water. The anticipated potential source of pollution to water resources from the project activities would be hydrocarbons (oil) from project vehicles, machinery, and equipment as well as potential wastewater/effluent from exploration related activities. The spills (depending on volumes spilled on the soils) from these machinery, vehicles and equipment could be washed in surface water bodies such as rivers and streams. The pollution may eventually infiltrate into the ground and pollute the fractured or faulted aquifers. This impact would occur during heavy rainy season when surface runoff would be inevitable. However, it should be noted that the scale and extent/footprint of the activities where potential sources of pollution will be handled is relatively small. Therefore, the impact will be moderately low.</p>										

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
Waste Generation (Environmental pollution)	Waste types such as solid, wastewater and possibly hazardous will be produced onsite during exploration. If the generated waste is not disposed of in a responsible way, land pollution may occur on the EPL or around the site. If solid waste such as papers and plastics are not properly stored or just thrown into the environment (littering), these may be consumed by animals on the farm which could be detrimental to their health. Improper handling, storage and disposal of hydrocarbon products and hazardous materials at the site may lead to soil and groundwater contamination, in case of spills and leakages. Therefore, the exploration programme needs to have appropriate waste management for the site. To prevent these issues, biodegradable and non-biodegradable wastes will be stored in separate containers and collected regularly for	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L - 1	L - 1	L - 2	L / M - 2	L - 8

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	disposal at a nearest recognized waste management facilities										
Occupational and Community Health and Safety Risks	<p>Project personnel (workers) involved in the exploration activities may be exposed to health and safety risks. These are in terms of accidental injury, owing to either minor or major (i.e., involving heavy machinery or vehicles) accidents. The heavy vehicle, equipment and fuel storage area should be properly secured to prevent any harm or injury to the Proponent's personnel, farm residents and animals. Another potential risks to both people and animals within the EPL are unfenced exploration trenches or trenches that are not backfilled after completing the sampling works. Unsecured exploration trenches and even uncapped holes could pose a risk of people or animals falling into the open trenches leading to injuries.</p> <p>The use of heavy equipment, especially during drilling and the presence of hydrocarbons on</p>	M - 3	M - 3	M - 6	M / H - 4	M - 48	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	<p>sites may result in accidental fire outbreaks. This could pose a safety risk to the project personnel and locals too.</p> <p>Furthermore, considering the current unemployment rate of youth in Namibia, people from other areas in different regions may learn of the project and be forced to go look for work. The influx of people into the project area may also lead to sexual relations between these out-of-area workers and the locals. This would lead to the spreading of sexual transmitted diseases (i.e., HIV/AIDS) when engaging in unprotected sexual intercourse.</p>										
Fire outbreaks	<p>During exploration, there is a risk of accidental fire outbreaks related to the project activities. These could be from unattended open fire used for preparing food (if the drilling crew is accommodated onsite), smokers who are part of the exploration crews failing to completely put out their cigarettes which may</p>	M - 3	M - 3	M - 6	M / H - 4	M - 48	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	result in a fire spreading over the farm areas and cause damage.										
Vehicular Traffic Safety	<p>The local roads such as B1 and D1463 are the main transportation routes for all vehicular movement in the EPL area. There would be a potential increase in traffic flow especially during the detailed exploration stage of the project activities, due to the delivery of supplies and services on site. These service and supplies will include but not limited to water, waste removal, procurement of exploration machinery, equipment, and others.</p> <p>Depending on the project needs, trucks, medium and small vehicles will be frequenting the area to and from exploration sites on the EPL. This would potentially increase slow moving heavy vehicular traffic along these roads.</p> <p>The exploration works will be undertaken in stages, on certain days of the week, few vehicles and the work will be temporary.</p>	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44	L / M - 2	L / M - 2	L - 2	L / M - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	Therefore, the risk is anticipated to be short-term, not frequent, and therefore of medium significance.										
Impact on local road use	The project activities will mean an increased movement of heavy trucks and equipment on local roads which would exert more pressure on these roads. These local roads in remote areas are normally not in a good condition already for light vehicles, and the additional vehicles such as heavy ones may make it worse and difficult to be used by small (vehicles) that already struggled on the roads prior. This will be a concern if maintenance and care is not done during the exploration phase. The impact would be short-term (during exploration only) and therefore, manageable	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L - 1	L - 1	M / L - 4	M / L -2	L - 12
Noise and vibration from drilling	There is a potential of noise from certain activities, especially drilling and trenching, which may be a nuisance to surrounding communities (farm houses) and farm animals. Excessive noise	M - 3	M - 3	M - 6	M / H - 4	M - 48	L - 1	L / M - 2	L - 2	L / M - 2	L - 10

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	and vibrations without any protective measures in place can be a health risk to workers on site. The exploration equipment used for drilling on site is of medium size and the noise level is bound to be limited to the site only, therefore, the impact likelihood is minimal. Without any mitigation, the impact is rated as of medium significance.										
Social Nuisance: Local Property intrusion and Disturbance or Damage	The presence of some out-of-area workers may lead to social annoyance to the local community. Not only out-of-area but locals too could intentionally trespass into private properties of the locals and damage them. The private properties of the farmers could be houses, unauthorized fences, or cause damage to animals (livestock and wildlife). The unpermitted and unauthorized entry to private properties resulting in property theft, vandalism (damage) may cause crashes between the affected property farmer(s) and the Proponent.	M - 3	M - 3	M - 6	M / H - 4	M - 48	L - 1	L - 1	M / L - 4	M / L - 2	L - 12

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
Archaeological and Heritage resources	The potential impact on heritage resources would be through the inadvertent unearthing of buried objects especially during trenching and drilling. Not only unearthing but the destruction of rock engravings and rock painting on certain outcrops falling within the EPL would lead to a loss of heritage resources. There are no known or observed surface heritage sites or objects within the EPL. However, the absence of such resources on the surface does not mean that such or some such sites cannot be encountered during excavation works. Therefore, the necessary measures will be implemented. This includes the Chance Finds Procedure attached to the Draft EMP.	M / H - 4	M - 3	M - 6	M - 3	M - 39	L - 1	L / M - 2	L - 2	L / M - 2	L - 10

7.5 Cumulative Impacts Associated with the Proposed Exploration

According to the International Finance Corporation (2013), cumulative impacts are defined as “those that result from the successive, incremental, and/or combined effects of an action, project, or activity (collectively referred to in this document as “developments”) when added to other existing, planned, and/or reasonably anticipated future ones”.

Similarly, to many other exploration projects, some of the cumulative impact to which the proposed project and associated activities potentially contribute are the:

- Poaching (illegal hunting of wildlife) and livestock theft: Given that some farmer might be conducting game farming, poaching may increase in the area, and some of which could be linked to people from outside the area. Similarly, livestock theft associated with the project workers could occur in the area. Therefore, this impact is likely to continue with the introduced additional people (related to projects) in the area. Regardless, mitigations measures will need to be implemented to mitigate these impacts.
- Impact on road infrastructure: The proposed exploration activities will contribute cumulatively to various existing activities such as farming activities, and travelling associated with tourism, local daily routines and other road uses associated with existing mineral licenses and other economic projects in the area. The contribution of the proposed project to this cumulative impact is however not considered significant given the short duration, and local extent (site-specific) of the intended mineral exploration activities.
- The use of groundwater: While the contribution of this project to groundwater abstraction will not be significant (as the significant amount of water will be not abstracted from the EPL), mitigation measures to reduce water consumption during exploration are essential.

8 CONCLUSIONS

The ESA Study for the proposed exploration activities on EPL-7047 was undertaken in accordance with the EMA and its 2012 EIA Regulations. Some key potential positive and negative impacts were identified. The key negative impacts were described, assessed and appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers.

The public was consulted as required by Section 21 to 24 of the EIA Regulations by placing notices in three newspapers (*Allgemeine Zeitung, Die Republikein, and Namibian Sun*) dated 10 and 17 November 2022.

Some key potential positive and negative impacts were identified by the Environmental Consultant and based on similar project experiences.

Impact Assessment: The key negative impacts were described, assessed and appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers to avoid and/or minimize their significance on the environmental and social components. The potential negative impacts assessed have a medium rating significance, given the short-duration of prospecting and

exploration. The effective implementation of the recommended management and mitigation measures accompanied by monitoring will greatly aid in minimizing the significance of adverse impacts that cannot be avoided completely (from medium rating to low). The implementation of measures to maximize the positive impacts will also increase the significance during exploration.

The Scoping assessment (ESA) Study was deemed sufficient and concluded that no further detailed assessments are required to the ECC application for the exploration activities.

Serja Consultants are confident that the potential negative impacts associated with the proposed project activities can be managed and mitigated by the effective implementation of the recommended management and mitigation measures and with more effort and commitment put on monitoring the implementation of these measures.

It is therefore, recommended that the proposed prospecting and exploration activities be granted an Environmental Clearance Certificate, and provided that:

- All the management and mitigation measures provided herein are effectively and progressively implemented and monitoring.
- All required permits, licenses and approvals for the proposed activities should be obtained as required. These include permits and licenses for land access agreements, services provision agreements to explore and ensuring compliance with these specific legal requirements.
- The Proponent, their project workers or contractors comply with the legal requirements governing their project and its associated activities and ensure that project permits and or approvals required to undertake specific site activities are obtained/renewed as stipulated by the issuing authorities.
- Site areas where exploration activities have ceased are rehabilitated, as far as practicable, to their pre-exploration state. This includes the levelling of stockpiled topsoil, backfilling of exploration trenches and closing/capping of exploration holes.

To maintain the desirable rating and that the potential impacts are under control, the implementation of management and mitigation measures should be monitored by their Environmental Control Officer (ECO) and audited by an Independent Environmental Consultant on a bi-annual basis. The monitoring of this implementation will not only be done to maintain the reduce impacts' rating or maintain low rating but to also ensure that all potential impacts that might arise during implementation are properly identified in time and addressed immediately.

9 LIST OF REFERENCES

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Appendix A: A Date Stamped Copy of the ECC Application Submitted to the Ministry of Mines & Energy (Competent Authority)



ANNEXURE 1

FORMS

Form 1

REPUBLIC OF NAMIBIA

ENVIRONMENTAL MANAGEMENT ACT (No. 7 of 2007)

(Section 32)

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (APP NO. 221116000351)

EPL 7047

PART A: DETAILS OF APPLICATION

1. Name: Ganas Stone Processors CC
2. Business Registration No.: CC/2021/02539
3. Correspondence Address: P. O. Box 2329 Swakopmund Namibia
4. Name of Contact Person: Mr. Ndiili Malima
5. Position of Contact Person: Managing Member
6. Telephone No.: +264 81 205 6559
7. Fax No: N/A
8. E-mail Address: info@serjaconsultants.com

PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE

1. THE ENVIRONMENTAL CLEARANCE CERTIFICATE IS FOR:

The 'listed activities' that are relevant or related to the proposed activities are listed below:

MINING AND QUARRYING ACTIVITIES

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

-Listed Activity 3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.

-Listed Activity 3.3 Resource extraction, manipulation, conservation, and related activities.

2. DETAILS OF THE ACTIVITY(S) COVERED BY THE ENVIRONMENTAL CLEARANCE CERTIFICATE:

2.1 Title of Activity

Environmental Clearance Certificate (ECC) for the Proposed Prospecting and Exploration Activities on Exclusive Prospecting License (EPL) No. 7047 Located south of Windhoek in the Khomas Region, Namibia

2.2 Location of Activity

EPL-7047 is located about 34km south of Windhoek in the Khomas Region. The 19,291.1681-hectare (ha) EPL covers farms such as Farm Bethlehem No. 27, Kransnek No. 269, Unkenfels No. 73, Gocheganas No. 26, Krumhuk No. 30, Waldeck No. 28, and parts of Farm Aris No. 29.

The locality map is presented in the Background Information Document (BID) accompanying this application.

2.3 Nature of Activity

Prospecting and Exploration Activities on Exclusive Prospecting License (EPL) No. 7047 Located south of Windhoek in the Khomas Region, Namibia

2.4 Scale and Scope of the Activity

The scale of the project is considered small to medium and short-term. The project activities will be limited within the EPL boundaries. The planned project activities are provided in the attached BID.

Prior to undertaking the proposed activities on the EPL, the Proponent will be required to sign land access and use agreements with the affected landowners or land custodian according to Section 51 (1a) of the Minerals (Prospecting and Mining) Act No. 33 of 1992. The anticipated duration of the proposed prospecting and exploration activities is between anticipated to last between 2 to 4 months for Dimension Stone and between 12 months to 36 months for Base & Rare, Industrial Minerals and Precious Metals. However, should the anticipated timeframe turn out to be insufficient or depending on the exploration findings by the end of the planned timeline, this may be stretched longer to some more months or year and communicated with the relevant stakeholders and affected landowners.

The Proponent intends to adopt a systematic prospecting approach of the following (detailed in the BID):

Base & Rare Metals, Precious Metals and Industrial Minerals

The Proponent intends to adopt a systematic prospecting and exploration approach of the following:

- Desktop Study: Geological mapping (Non-invasive Technique such as geophysics)
- Lithology geochemical surveys: Rock and Soil sampling consists of small pits.

- Detailed Exploration Drilling and Trenching (Invasive Technique): Should analyses by an analytical laboratory be positive, holes are drilled, and drill samples collected for further analysis.

Dimension Stone: Desktop and Detailed Exploration (Test Quarrying)

The exploration of dimension stone on the EPL will be done as per the following approach:

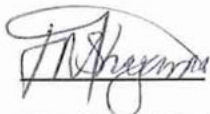
- Desktop Study: The exploration program will commence with a review of geological maps and historical drilling and / or exploration data for the area, if any.
- Field Evaluation: The field evaluation is to be carried out by simple collection of demonstration sample blocks on target areas of the EPL.
- Feasibility Study / Detailed Exploration and Test Quarrying.

The project requirements in terms of human resources, technology, equipment, vehicles, and machinery are described in the attached BID.

The granting of the ECC and effective implementation of the Environmental Management Plan (EMP) will ensure that the exploration activities comply with the Environmental Management Act, 2007, and the 2012 Environmental Impact Assessment (EIA) Regulations, while ensuring responsible as well as sustainable mineral exploration in Namibia at large.

PART C: DECLARATION BY APPLICANT

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended, or cancelled if any information given above is false, misleading, wrong, or incomplete.



FREDRIKA SHAGAMA

Environmental Assessment Practitioner

Signature of Applicant Full Name in Block letters

Position

on behalf of **Ganas Stone Processors CC**

17/11/2022
Date