



Submitted to: Jindal Mining Namibia (Pty) Ltd
Attention: Mr Debananda Tripathy
P O Box 31490
Pionerspark
Windhoek, Namibia

I&AP PUBLIC CONSULTATION DOCUMENT:

I&AP COMMENTS AND RESPONSES FOR THE JINDAL IRON ORE MINE PROJECT ON EPLS 4013 AND 4194, KHOMAS REGION, NAMIBIA

PROJECT NUMBER: ECC-148-464-REP-06-D
REPORT VERSION: REV 03
DATE: 2 SEPTEMBER 2024



TITLE AND APPROVAL PAGE

Project Name:	I&AP Comments and Responses for the Jindal Iron Ore Mine Project on EPLs 4013 and 4194, Khomas Region, Namibia
Client Company Name:	Jindal Mining Namibia (Pty) Ltd
Client Representatives:	Mr Debananda Tripathy
Ministry Reference:	APP-004009
Authors:	Monique Jarrett, Matt Totten Jr and Jessica Bezuidenhout
Status of Report:	Rev 03/Final for Government Submission
Project Number:	ECC-148-464-REP-06-D
Date of issue:	2 September 2024
Review Period	N/A

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

DISCLAIMER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

TABLE OF CONTENTS

1	Summary of public meetings and comments from I&APs.....	5
1.1	Introduction	5
1.2	Public meetings summary	5
1.3	Key feedback on issues of concern – public meetings	6
1.4	Detailed comments and responses from the public meetings	7
2	Acknowledgements.....	34

LIST OF TABLES

Table 1 – Comments and responses from feedback received during the I&AP registration period.....	26
Table 2 – Comments and feedback from the public meeting.....	28

APPENDICES

Appendix A – Adverts.....	35
Appendix B – Stakeholder Letters.....	37
Appendix C – Site Notices.....	39
Appendix D – BID.....	44
Appendix E – Attendance registers	45
Appendix F – I&AP registration Forms and List.....	51
Appendix G – PUBLIC Meeting Presentation.....	58

ABBREVIATIONS

Abbreviation	Description
CSI	community sustainable investment
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy
e.g.	example
EIA	environmental impact assessment
EMP	environmental management plan
EPL	exclusive prospecting licence
ESIA	environmental and social impact assessment
I&APs	interested and affected parties
L	litre
Ltd.	Limited
m	metre
m/day	metres per day
MEFT	Ministry of Environment, Forestry and Tourism
ML	mining licence
MME	Ministry of Mines and Energy
NAC	Namibia Airports Company
NAMCARs	Namibia Civil Aviation Regulations
NCAA	Namibia Civil Aviation Authority
Pty	proprietary company
RoD	record of decision
ToR	terms of reference
WRD	waste rock dump

1 SUMMARY OF PUBLIC MEETINGS AND COMMENTS FROM I&APS

1.1 INTRODUCTION

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Jindal Mining Namibia (Pty) Ltd, the Proponent, to conduct an Environmental and Social Impact Assessment (ESIA) in accordance with the Environmental Management Act, No. 7 of 2007 and its regulations of 2012, for which an application for an environmental clearance certificate will be submitted for the proposed construction and operation of the Jindal Iron Ore Mine on EPLs 4013 and 4194, within the Khomas Region, Namibia.

The proposed project (referred to as “the Project” herein) involves establishing an iron ore mining operation, comprising several open pits to be excavated using conventional blasting and drilling techniques. Ore and waste rock will be excavated and hauled by a fleet of mobile equipment, with waste rock being transported to a waste rock dump (WRD) site. The extracted ore will undergo crushing and pebble milling at the beneficiation plant, followed by magnetic separation and subsequent reverse flotation and concentrate filtration during the final processing stages. The resulting product, iron ore fines, will then be transported to Walvis Bay by either road or rail for shipment.

The community directly affected and/ or interested was identified and invited to attend the public meeting. A summary of the feedback received from the public will be issued to registered I&APs and competent authorities being the Ministry of Mines and Energy (MME), and the Ministry of Environment, Forestry and Tourism (MEFT) to accompany the application for an environmental clearance certificate, for a record of decision (RoD).

1.2 PUBLIC MEETINGS SUMMARY

The stakeholder meeting was facilitated by Mr Matt Totten Jr, Geologist – Environmental Compliance Consultancy (ECC) – with technical support from Ms Monique Jarrett (ECC), as well as Mr Arvind Kuchibhotla and Mr Debananda Tripathy from Jindal Mining Namibia (Pty) Ltd.

The welcoming and agenda of the meeting included an introduction to ECC as an independent environmental consulting company commissioned by Jindal Mining Namibia (Pty) Ltd as the environmental assessment practitioner (EAP) to conduct the ESIA.

Mr Kuchibhotla then gave a technical presentation on behalf of Jindal, providing an overview about the Project’s location, proposed operations on EPLs 4013 and 4194, and an explanation of the Project’s current status. The objective of the public meeting was to engage stakeholders and to identify and address any concerns held regarding the proposed Project.

Mr Arvind provided further insight into Jindal's background as well as the company's goals and strategies for the proposed Jindal Iron Ore Project in Namibia. Mr Arvind highlighted the importance and value of the Project relating to Namibia's environment and economy.

To conclude the presentation, Mr Totten (ECC) then explained the environmental assessment process as well as the current status of the proposed Project's ESIA. This included aspects and concerns about the impacts of exploration activity on the biophysical, how mitigation and monitoring measures could potentially be enforced and how the attendees, as registered interested and affected parties (I&APs), could contribute to the process and development of the proposed Project's environmental management plan (EMP). The floor was then opened for questions, comments, and further discussion.

1.3 KEY FEEDBACK ON ISSUES OF CONCERN – PUBLIC MEETINGS

The summary of comments received from the public meeting presented useful and valuable input in setting out the environmental and social impact assessment's scope through questions asked and points raised. From an overall review of the recorded statements, the key common themes of concern that were raised can be summarised in the following categories:

Baseline/specialist studies

Numerous registered I&APs and participants at the public meeting inquired about the status of baseline and/or specialist studies. They specifically requested studies on noise, air quality, hydrology, flora and fauna, as well as blast and vibration. As the proposed Project's EAP, ECC assured the public that the terms of reference (ToR) for these specialist studies will be formulated based on the environmental impacts identified during the scoping phase of the project. Currently, scoped impacts include air quality, noise, groundwater, heritage, biodiversity, visual, socio-economic, and blast and vibration, for which baseline and specialist studies will be commissioned.

Impact of Mine Operations and future potential exploration and expansion of the mine on the Drie Krone Nature Village

The Drie Krone Nature Village occupies a section of Farm Brack situated in the southwestern area of EPL 4194. While the Proponent currently has no plans to develop infrastructure on this part of the EPL, concerns have been raised by the public regarding potential impacts on their settlement should the mine expand in the future. In response, the Proponent assured the public that they intend to relinquish portions of EPL 4194 during the next renewal process, and they may also exclude certain areas from their mining licence (ML) application. Residents of the Drie Krone Nature Village have consequently requested the Proponent to exclude their settlement from the ML boundary and to relinquish that particular area during the upcoming renewal.

Provision of water for the mine's operations

Concerns were raised by the public regarding the use of groundwater for both mine operations and residential facilities on site. Specifically, local farm owners and residents expressed apprehension, citing a scarcity of water in the area. They argued that relying on local groundwater

would not be sustainable for the mine and would deplete the already limited water resources. The Proponent countered that water for mining operations would be obtained from the Ujams wastewater treatment plant, with produced groundwater being reserved solely for providing potable water to the anticipated 50-100 employees that would be onsite at any given time. Local stakeholders then countered the Proponent's statement claiming that even if groundwater was used exclusively for the mine's potable needs, sufficient water resources were unlikely to exist in the area. However, a hydrology study is pending, and plans for water sourcing and usage are subject to further examination. Final decisions will be made based on the feasibility of these plans and their environmental impact.

1.4 DETAILED COMMENTS AND RESPONSES FROM THE PUBLIC MEETINGS

Comments were received during the stakeholder meeting, via email submission, and via telephone which are included in the draft scoping report and this document in Table 1 below.

Further comments were welcomed after the initial registration period and public review period. The public consultation period will remain open for I&APs until the final assessment report for the project is ready for submission to the competent authorities.

Letter to ECC sent from Sisa Namandje & Co. Inc on 9 April 2024:



**SISA NAMANDJE
& CO. INC**

Legal Practitioners • Conveyancers • Notaries • Estate Administrators

Our ref: C 468/SN/24-ik

09 APRIL 2024

ENVIRONMENTAL COMPLIANCE CONSULTANCY (ECC)
P O BOX 91193
KLEIN WINDHOEK
WINDHOEK

ATTN: MR STEPHAN BEZUIDENHOUT
PER E-MAIL: stephan@eccenvironmental.com
AND
ATTN: MS JESSICA BEZUIDENHOUT MOONEY
PER E-MAIL: jessica@eccenvironmental.com

Dear Sir and Madam,

RE: IDENTIFIED STAKEHOLDER AND POTENTIAL INTEREST OR AFFECTED PARTY IN
RESPECT OF THE PROPOSED JINDAL IRON ORE PROJECT ON EPLS 4013 AND
4194, KHOMAS REGION - COMSAR PROPERTIES SA

We act herein for and on behalf of COMSAR Properties (Pty) Ltd ("our client") as an affected and interested party in relation to the above matter.

Our client's rights and interests in Farm Rainhof, No. 123 Khomas Region and Farm Wolffsgrund, No. 122 Khomas Region would be adversely affected by the proposed Jindal Iron Ore Project.

All our client's rights are fully reserved.

Authorized and regulated by
Law Society of Namibia
VAT Registration No:
4658625-015
Company Registration
No:2008/0409

DIRECTORS: S Namandje, KM Jankie, AN Feris, NN Alexander, THIJ Illeka - Amupanda

SENIOR ASSOCIATES: JA Janke, WNK Simson

ASSOCIATES: EK Nangolo, K Gaeb, J Arnols

PHONE & FAX:
T. +264 61 259 848
F. +264 61 259 849

POST:
P. O. BOX 4240
Windhoek, Namibia

EMAIL & SITE:
sisa@lway.na
www.sisanamandjeinc.com

ADDRESS:
13 & 15 Pasteur Street, Windhoek
West, Windhoek. Namibia

ECC Email Response sent to Sisa Namandje & Co. Inc on 11 April 2024:

Stephan Bezuidenhout <stephan@eccenvironmental.com>

Thu, Apr 11, 2024 at 11:06 AM

To: sisa@iway.na

Cc: Jackson Janson <jackson@sisanamandjeinc.com>, Matt Totten <mtotten@eccenvironmental.com>, Monique Jarrett <monique@eccenvironmental.com>, Samuel Shinyemba <samuel@eccenvironmental.com>

Good day,

We confirm receipt of your email and the letter attached.

Kind regards,

--

Stephan Bezuidenhout

Environmental Compliance Consultancy (ECC)

Position: Managing Director & Principal Environmental Practitioner

Mobile: +264 81 262 7872

Office Tel: +264 81 669 7608

Postal: PO Box 91193 | Klein Windhoek | Namibia

Address: 1 Jan Jonker|Wasserberg Park|Klein Windhoek|Namibia

Email: stephan@eccenvironmental.com

Website: www.eccenvironmental.com

Letter to ECC sent from WKH Legal Practitioners on 15 April 2024:

WINDHOEK
WKH House
Jan Jonker Road,
Ausspannplatz
PO Box 864/822,
Namibia
Tel: +264 61 275 550

ONGWEDIVA
Shop 27, Oshana Mall
Private Bag 3725,
Namibia
Tel: +264 65 220 637
Tel: +264 65 238 034

SWAKOPMUND
Shop 208, Platz Am Meer
PO Box 2970,
Namibia
Tel: +264 64 443 100

WALVIS BAY
Office 1, Ground Floor,
Cnr of Theo Ben Cuirirab
Ave & Johnson Fwafwa
Mababeng Street
PO Box 4509,
Namibia
Tel: +264 64 211 890

GROOTFONTEIN
23B Hi-dipo Hamuteruya
Street, PO Box 29240,
Namibia
Tel: +264 67 248 700

DIRECTORS

A Sivanepoel, B.Com LLB
P U Kauta, B.Jur LLB
A A J Nauda, B.Jur LLB
E H Yssel, B.A LLB
C P J Potgieter, B.Com LLB
F N Kishi, B.Proc
L T van den Berg, B.LC LLB
R B Strauss, B.Com LLB
B Greyvenstein, B.Proc
V M Hanongo-Haikali, LLB
M D Erkana, LLB
P H K Botha, B.Com LLB
R Dreyer, LLB
C M Tjhero, B.Jur LLB
A J Malherbe, B.A LLB
M U Kuzeezo, LLB, LLM (Tax)
N van Schalkwyk, LLB
L Martins, B.A LLB
T Luvindao, B.Jur, LLB, M.Eng
S Wagner, B.A, LLB

ASSOCIATES

S Maritz, B.Jur LLB
D F Malherbe, B.Proc B.A (Hon)
W H Visser, B.A LLB
C Louw van Wijk, B.A LLB
J G van der Merwe, B.A LLB
A I Dos Santos, B.A LLB, LLM
M Tjjaone, B.Jur LLB
P M Hango, B.Jur LLB
E N T Shigwedha, B.Jur LLB
S Venter, LLB
S P Paulus, LLB
C Turck, LLB
T Martin, B.SOC, LLB
S H Jansen, LLB, LLM
N Köhnel, B.Com, LLB
J Louw, B.Sc, B.Com LLB
J Moolman, B.A, LLB, LLM
IDV Vogel, LLB

CONSULTANTS

S Cowley, BB SSC (Hon), LLB

**DR WEDER, KAUTA
& HOVEKA INCORPORATED**
Reg. No. 2006/527
VAT No. 4256169-01-5
www.wkh-law.com
Authorized and Regulated by
the Law Society of Namibia



15 April 2024

**ENVIRONMENTAL COMPLIANCE
CONSULTANCY (PTY) LTD**
PO BOX 91193
KLEIN WINDHOEK
WINDHOEK

Our Ref: MAT102979

Reply To: moolman@wkh-law.com
louw@wkh-law.com

Enquiries: Mrs Moolman and Ms Louw

Your Ref: ECC-148-464-LET-07-A

ATT: S. Bezuidenhout and J. Mooney

Dear Sir and Madam,

RE: NOTIFICATION OF AN ENVIRONMENTAL ASSESMENT OF THE PROPOSED
JINDAL IRON ORE PROJECT ON EPLS 4013 AND 4194, KHOMAS REGION,
NAMIBIA, AND AN INVITATION TO SCHEDULED PUBLIC CONSULTATION
MEETINGS

- We refer to the above as well as letter dated 28 March 2024.
- We confirm that we act herein on behalf of Mr. Robert Douglas Wirtz ("our Client").
- Our Client is the registered owner of -

CERTAIN	Farm Koanus No. 121 Registration Division "K" Khomas Region
MEASURING	7916,7403 (Seven Nine One Six comma Seven Four Zero Three) hectares
HELD BY	Deed of Transfer No. T3351/2007.
- Our Client is therefore an interested and affected party as per the definition thereof as set out in regulation 1 of the Environmental Impact Assessment Regulations GN 30/2012, (the "Regulations").
- In terms of sub regulation 21(2), notice of the relevant application must be given to all potential interested and affected parties by -
 - fixing a notice board (at least 60cm by 42cm in size) at a place conspicuous to the public at the boundary or on the fence of the site where the activity to which the application relates is or is to be undertaken;

Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc., will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

5.2. giving written notice to –

- 5.2.1. the owners and occupiers of land adjacent to the site where the activity is or is to be undertaken or to any alternative site;
- 5.2.2. the local authority council, regional council and traditional authority, as the case may be, in which the site or alternative site is situated;
- 5.2.3. any other organ of state having jurisdiction in respect of any aspect of the activity; and

5.3. advertising the application once a week for two consecutive weeks in at least two newspapers circulated widely in Namibia.

6. Kindly provide proof of compliance with sub regulation 21(2), including a list of all potential interested and affected parties that have been notified. We also herewith, in terms of sub regulation 22(2), request access to the register of interested and affected parties.
7. Furthermore, sub regulation 21(3)(b)(i) provides that the abovementioned notice must state that the application is to be submitted to the Environmental Commissioner. This information is not set out in the notice received by our Client.
8. Trust on your prompt cooperation.

Kind Regards,



DR WEDER, KAUTA & HOVEKA INC

PER: JA LOUW



Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc, clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc. will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

24 May 2024 ECC Response Letter to WKH Legal Practitioners' 14 April 2024 Letter:

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



REFERENCE: ECC-148-464-LET-08
24 May 2024

ATT: Mrs. Moolman and Ms. Louw on behalf of Mr. Robert Douglas Wirtz of Farm Koanus
PO Box 864/822
Windhoek
Namibia

Dear Madams,

RE: RE: NOTIFICATION OF AN ENVIRONMENTAL ASSESMENT OF THE PROPOSED JINDAL IRON ORE PROJECT ON EPLs 4013 AND 4194, KHOMAS REGION, NAMIBIA, AND AN INVITATION TO SCHEDULED PUBLIC CONSULTATION MEETINGS

1. We refer to the above as well as your letter dated 15 April 2024, which we confirm receipt of.
2. We hereby confirm that your client, Mr. Robert Douglas Wirtz, owner of Farm Koanus No. 121, is now registered as an Interested and Affected Party (I&AP) for the Proposed Jindal Iron Ore Project on EPLs 4013 and 4194, Khomas Region, Namibia.
3. In terms of sub regulation 21(2) of the Environmental Impact Assessment Regulations (G.N. No. 30 of 2011), where notice of the relevant application must be given to all potential interested and affected parties (I&APs), please note that Environmental Compliance Consultancy Pty Ltd (ECC) has undertaken the following actions to fulfill this regulatory obligation to date:
 - 3.1. Five site notice boards (with dimensions 60 cm by 42 cm) were placed on Thursday 11 April, 2024 in conspicuous locations at or near the proposed activity site with the following coordinates:

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+254 81 669 7608



3.1.1. **Site Notice Board #1:** located at the B6 and C23 T-junction

Lat/Long Coordinates: -22.53426 °N and 17.33206 °E

Photo:



3.1.2. **Site Notice Board #2:** located on the C23 (at the northern boundary of EPL 4013)

Lat/Long Coordinates: -22.64608 °N and 17.39842 °E

Photo:



Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



3.1.3. Site Notice Board #3: located at the B6 and M51 T-junction

Lat/Long Coordinates: -22.48901 °N and 17.49563 °E

Photo:



3.1.4. Site Notice Board #4: located on the M51 (within EPL 4194)

Lat/Long Coordinates: -22.53537 °N and 17.59080 °E

Photo:



Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+254 81 669 7608



- 3.1.5. **Site Notice Board #5:** located on the B6 (across from H.K. International Airport)
Lat/Long Coordinates: -22.49762 °N and 17.46299 °E
Photo:



- 3.2. Written notices have been sent to the following persons, land owners, land occupiers, organisations and authorities:

- 3.2.1. Owners and occupiers of land on or adjacent to the site where the activity is to be undertaken that have been sent written notice:

- 3.2.1.1. Mr. Alexander Gariseb of Namibia Airports Company (NAC)
- 3.2.1.2. Mrs. Bergie of Farm Helga
- 3.2.1.3. Mr. Jan Jacobus Van der Merwe
- 3.2.1.4. Mr. Robert Douglas Wirtz of Farm Koanus
- 3.2.1.5. Mr. Willem Gous of Farm Brack
- 3.2.1.6. 3 Krone Nature Village
- 3.2.1.7. COMSAR Properties of Farm Wolffsgrund and Farm Rainhof
- 3.2.1.8. Drie Krone Nature Estate
- 3.2.1.9. Etando Ranch Guest Farm
- 3.2.1.10. Farm Sonneleiten Guest House

Environmental Compliance Consultancy (Pty) Ltd | Registration Number: 2022/0593

4

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



- 3.2.1.11. Gmunder Lodge
- 3.2.1.12. Hohewarte Guest Farm
- 3.2.1.13. Marula Game Ranch
- 3.2.1.14. Namibia Environment and Wildlife Society
- 3.2.1.15. Namiba Power Corporation (NamPower)
- 3.2.1.16. Okabis Hunting
- 3.2.1.17. Ondekarenmba – One Namibia
- 3.2.1.18. Our Habitas Namibia
- 3.2.1.19. Perivoli Rangeland Institute
- 3.2.1.20. Voigtland Guesthouse
- 3.2.1.21. Zannier Hotels Omaanda

3.2.2. Please note that we have identified the following list of owners and occupiers of land adjacent to the site where the activity is to be undertaken, but have not sent written notice as we are still in the process of collecting their contact details:

- 3.2.2.1. Eden Chalets
- 3.2.2.2. Farm 456
- 3.2.2.3. Farm Alt-Seeis
- 3.2.2.4. Farm Coas
- 3.2.2.5. Farm Direllis
- 3.2.2.6. Farm Excelsior
- 3.2.2.7. Farm Grasland
- 3.2.2.8. Farm Groot Brack
- 3.2.2.9. Farm Hohenau
- 3.2.2.10. Farm Hohewarte
- 3.2.2.11. Farm Neu-bismark
- 3.2.2.12. Farm Otjimukona
- 3.2.2.13. Farm Oupembamewa
- 3.2.2.14. Farm Progress
- 3.2.2.15. Farm Richthofen
- 3.2.2.16. Farm Seeis
- 3.2.2.17. Farm Smaldeel
- 3.2.2.18. Farm Springbockvley
- 3.2.2.19. Farm Stolzenfeld
- 3.2.2.20. Farm Waldberg
- 3.2.2.21. Finkenstein Estates
- 3.2.2.22. Heja Lodge
- 3.2.2.23. Lodestone
- 3.2.2.24. NamPot

Environmental Compliance Consultancy (Pty) Ltd | Registration Number: 2022/0593

5

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+254 81 669 7608



3.2.2.25. Progress Guest Farm

3.2.3. Local and regional authorities that have been sent written notice:

- 3.2.3.1. Khomas Regional Council
- 3.2.3.2. Windhoek Municipality
- 3.2.3.3. Namibia Civil Aviation Authority (NCAA)

3.3. Advertisements informing the public about the proposed project application and respective 16 April 2024 public consultation meeting have been placed in three widely circulated Namibian newspapers (the Namibian Sun, Republikein and Allgemeine Zeitung) once a week for two consecutive weeks ahead of the 16 April 2024 public consultation meeting.

The dates of publication and respective tearsheets for these newspaper advertisements are as follows:



Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
Info@eccenvironmental.com
www.eccenvironmental.com
+254 81 669 7608



3.3.1. Tuesday 2 April 2024:



TE KOOP
SKOON ROLLE NIT
KREMMATTOYER
WIE DIE GERONDE

-PANEELKLOPPERS
-NIWERHEDE
-RESTAURANTE **-SKOLE**
-VERPAKKINGSMATERIAAL
per kg

Pris op aanevraag
SKART, AGNES, 300 000,00
CHANTREL, 200 000,00
3 - 4 DOORSTRAK
LAFRENZ INDUSTRIEEL

Namibian Stock Exchange Notice
Notice to Members regarding the 2024 Annual General Meeting of the members of the Namibian Stock Exchange will be held on 20 April 2024 at 10:00 AM.

OMEYA
Senior Manager
Landscape: Strategic and Financial Data
Company: Omega-Systems-Association

EXPRESSION OF INTEREST
DEB MARINE

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



3.3.2. Wednesday 10 April 2024:



The screenshot shows a news website with the following sections:

- Market Watch:** Includes a QR code, a table of Economic Indicators (Foreign Reserves, Exchange Rates, Inflation, etc.), and a 'Market Watch' section.
- COMPANY NEWS IN BRIEF:** Contains several short news items with accompanying images, such as 'JINDAL'S NEW INVESTMENT STARTS TRAINING' and 'MEDIASCOPE GROUPS EXPANSION TO ECONOMIC COLLABORATION'.
- Market Watch Table:**

Indicator	Unit	2023	2024	2025	2026	2027	2028	2029	2030
Foreign Reserves	USD	1000000000000	1000000000000	1000000000000	1000000000000	1000000000000	1000000000000	1000000000000	1000000000000
Exchange Rates	USD	15.00	15.00	15.00	15.00	15.00	15.00	15.00	15.00
Inflation	%	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00
Interest Rates	%	10.00	10.00	10.00	10.00	10.00	10.00	10.00	10.00



Medscheme
CAREER OPPORTUNITY
Senior Manager - Managerial Care

The role of the position is to provide leadership and management to the Managerial Care team, ensuring the delivery of high-quality patient care and the development of staff.

Requirements: A Bachelor's degree in a relevant field, such as Health Services Management, Public Health, or a related discipline. A minimum of 5 years of experience in a managerial role within a healthcare setting.

Application: Submit your CV and cover letter to: hr@medscheme.com



ECC Environmental Compliance Consultancy
We provide comprehensive environmental compliance services, including impact assessments, monitoring, and reporting. Our team consists of experienced professionals with a proven track record in the industry.

Services: Environmental Impact Assessment, Environmental Monitoring, Environmental Reporting, Environmental Management Plans, Environmental Audits.

Contact: info@eccenvironmental.com | www.eccenvironmental.com

4. A public consultation meeting was held as advertised on Tuesday 16 April 2024 from 18:30 to 20:30 at the Namibian Scientific Society in Windhoek, Namibia.

4.1. A PDF copy of the presentation (co-presented by ECC as the appointed Environmental Assessment Practitioner (EAP), and Jindal Africa as the Project proponent) can be downloaded from the following ECC website url address:

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



<https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-the-jindal-iron-mine-khomas-region-namibia/>

4.2. The list of 16 April 2024 public consultation meeting attendees is as follows:

#	Organisation	Name
1	3 Krone Nature Village	Antje Schidlowski
2	3 Krone Nature Village	Sven von Blottnitz
3	3 Krone Nature Village	Marianne Röder
4	3 Krone Nature Village	Berry Röder
5	3 Krone Nature Village	Ute Mehnert
6	3 Krone Nature Village	Marc Mehnert
7	Bellatrix SME Finance	Vekunda Kakujaaha
8	Environmental Compliance Consultancy (ECC)	Matt Totten jr
9	Environmental Compliance Consultancy (ECC)	Luke Towers
10	Environmental Compliance Consultancy (ECC)	Monique Jarrett
11	Environmental Compliance Consultancy (ECC)	Sam Shinyemba
12	Environmental Compliance Consultancy (ECC)	Kelly Ochs
13	Etango Ranch	R. Gellman
14	Farm Binnenhain	E.W. Romais
15	Farm Bismarck-Grasland	J. Bremmand
16	Farm Brack	Andre F. Gous
17	Farm Brack 438	Willem Gous
18	Farm Helga	B. Bergmann
19	Farm Hoenu	Rainer Halenke
20	Farm Koanus	R.D. Wirtz
21	Farm Neu Brack	H.G. Romais
22	Farm Neu Brack	H. Romais
23	Jindal Africa	Arvind Kuchibhotla
24	Jindal Africa	Debananda Tripathy
25	Jindal Africa	Frank Garapasi
26	Marula Game Ranch	J. Kotze
27	Private	Hendrik Hamman
28	Progress Farm / Progress Safaris	Mike Kibble
29	Perivoli Rangeland Institute	Evert Steplan
30	Sisa Namundje & Co.	Kula Simson
31	Voigtland Guesthouse	Stephan Voigts
32	Progress Farming PTY LTD	Sonja & Mike Kibble

Environmental Compliance Consultancy (Pty) Ltd
 PO Box 91193 Klein Windhoek Namibia
 Info@eccenvironmental.com
 www.eccenvironmental.com
 +264 81 669 7608



5. As proof of compliance with sub regulation 21(2) of the Environmental Impact Assessment Regulations (G.N. No. 30 of 2011), please refer to the list of all potential, identified and registered I&APs for the proposed project in responses 3.2.1, 3.2.2, 3.2.3, and 4.2 above.

The current list of registered I&APs for the proposed project as of 25 April 2024 includes:

#	Name	Organisation
1	Antje Schidlowski	3 Krone Nature Village
2	Bernd Röder	3 Krone Nature Village
3	Marianne Röder	3 Krone Nature Village
4	Berry Röder	3 Krone Nature Village
5	Sven von Blottnitz	3 Krone Nature Village
6	Vekunda Kakujaha	Bellatrix SME Finance
7		City of Windhoek
8	Sisa Namandje	COMSAR Properties
9	Ndelimona Ipinge	EIA Tracker (NEWS)
10	R. Gellman	Etango Ranch
11		Etango Ranch Guest Farm
12	C.W. Romais	Farm Binnenhain
13	J. Bremmand	Farm Bismarck-Grasland
14	Andre F. Gous	Farm Brack
15	Willem Gous	Farm Brack 438
16	B. Bergmann	Farm Helga
17	Rainer Halenke	Farm Hoenau
18	Talitha Harmse	Farm Koanus
19	R.D. Wirtz	Farm Koanus
20	H.G. Romais	Farm Neu Brack
21	H. Romais	Farm Neu Brack
22		Farm Sonnleiten Guest House
23		Gmunder Lodge
24		Heja Lodge
25		Hohewarte Guestfarm
26		Khomas Regional Authority
27	J. Kotze	Marula Game Ranch
28	Alexander Gairiseb	Namibia Airports Company
29	H.K. International Airport	Namibia Airports Company
30	Dennis F. Gaingob	Namibia Civil Aviation Authority
31		Namibia Power Corporation
32		Okabis Hunting

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
Info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



33		Ondekarenmba
34		Our Habitas Namibia
35	Evert Steplan	Rangeland Institute
36	Hendrik Hamman	Private Individual
37	Jan Van der Merwe	Private Individual
38	Mike Kibble	Progress Farming
39	Sonja Kibble	Progress Farming
40	Kula Simson	Sisa Namundje & Co.
41	Ute Mehnert	Ute Mehnert
42	Stephan Voigts	Voigtland Guesthouse

6. In regard to the matter raised in paragraph 7 of your letter referencing the content of the notice that must be issued under sub-regulation 21(2), we note that the provisions of sub regulation 21(3)(b)(i) of the Environmental Impact Assessment Regulations (G.N. No. 30 of 2011) (the "Regulations") are in direct conflict with:

- the specific provisions of sub regulations 32(1) of the Environmental Management Act, 2007 which states:

32. (1) A person who is required to obtain an environmental clearance certificate must, in the prescribed form and manner and on payment of the prescribed fee, apply to the relevant competent authority for an environmental clearance certificate in respect of the listed activity to be undertaken.

And

- the specific provisions of sub regulation 6(1)(b) of the Environmental Impact Assessment Regulations (G.N. No. 30 of 2011), which states that:

6 (1) The application for an environmental clearance certificate must be -

6 (1) (b) submitted to the relevant competent authority.

The Competent Authority in this instance, as per the definition set out in Section 1 of the Environmental Management Act 2007, being the "organ of State which is responsible, under any law, for granting or refusing an authorisation" which in this case is the Minister of Mines and Energy, which has granted the Exclusive Prospecting Licences EPL 4013 and 4194 for the Jindal Iron Ore Project.

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
Info@eccenvironmental.com
www.eccenvironmental.com
+254 81 669 7608



It is further noted that the provisions of section 32(2) of the Environmental Management Act, 2007 states that:

(2) The competent authority must in the prescribed manner forward the application referred to in subsection (1) to the Environmental Commissioner, if the proponent complies, in respect of the proposed activity, with any requirements prescribed by law in respect of that activity.

Consequently, any notice issued in compliance with the provisions of sub regulation 21(3)(b)(i) of the Regulations and containing a statement that "the application is to be submitted to the Environmental Commissioner" would also be in conflict with and non-compliant with the provisions of Section 32(1) of the Environmental Management Act, 2007 and sub regulation 6(1)(b) of the Regulations which state that "the application must be submitted to the Competent Authority".

Accordingly, in light of the apparent conflict within the provisions of the relevant sections of the legislation, and out of abundant caution to remain within the boundaries of compliance with the Environmental Management Act, 2007 and Regulations, ECC has therefore stated "... an application for an environmental clearance certificate in accordance with the Environmental Management Act, No. 7 of 2007 will be made ..." on all of its public notices for the proposed Jindal Iron Ore Project.

7. Should you or your client have any further questions or require more information about the proposed Project or ESIA process, please do not hesitate to contact ECC.

Yours sincerely,



Stephan Bezuidenhout
stephan@eccenvironmental.com



Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com

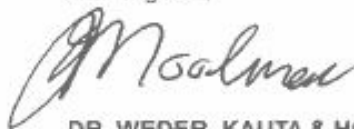
(1) *Subject to the provisions of this Act, an exclusive prospecting licence shall be valid*

- (a) *for such period, not exceeding three years, as may be determined by the Minister at the time of the granting of such licence; and*
- (b) *for such further periods, not exceeding two years at a time, as may be determined by the Minister at the time of the renewal of such licence as from the date on which such licence would have expired if an application for its renewal had not been made.*

(2) *An exclusive prospecting licence shall not be renewed on more than two occasions, unless the Minister deems it desirable in the interests of the development of the mineral resources of Namibia that an exclusive prospecting licence be renewed in any particular case on a third or subsequent occasion.*

- 6. In terms of section 71 of the Act, an exclusive prospecting licence may not be granted for a period exceeding 3 (three) years, and thereafter, the exclusive prospecting licence may be renewed only twice for periods not exceeding 2 (two) years at a time. This means that an exclusive prospecting licence may not be granted for a total period exceeding 7 (seven) years, save where the Minister deems it appropriate to renew an exclusive prospecting licence for a third or subsequent time.
- 7. The total validity periods of EPL 4194 and EPL 4013 are 17 (seventeen) years each, which is 10 (ten) years more than what is legally permissible in terms of the Act.
- 8. In the premises, kindly provide us with the Ministerial approval contemplated in section 71(2) of the Act, failing which our Client reserves his right to pursue any legal remedies available to him in law, including to set aside the decision to grant EPL 4194 and EPL 4013.

Kind regards,



DR. WEDER, KAUTA & HOVEKA INC
PER: J MOOLMAN

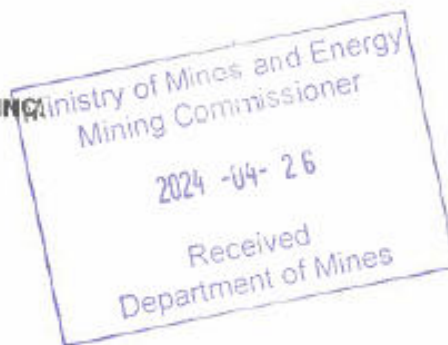


Table 1 - Comments and responses from feedback received during the I&AP registration period.

Name and Stakeholder Details	Comment/Question Received	Response/Clarification
<p>Sven von Blottnitz Resident on the Drie Krone Nature Village</p>	<p>I am concerned about the impact of the proposed mining operation on the residential settlement's peace and tranquillity, as well as the impacts of dust, noise, blasting, and fauna/wildlife disturbance. Furthermore, the impact on water resources to be used for the mining operation is also a concern because it could reduce the water available for our residential settlement.</p>	<p>Various baseline and specialist studies will be conducted to better understand and gauge the impact that the mine will have on sensitive receptors such as the nearby settlements. Mitigation measures will then be recommended to minimise any identified impacts.</p>
<p>Barnard Jacobus Buys Three Sixty Consult cc</p>	<p>Assisting local and foreign construction companies to recruit, appoint and manage Namibian Labour during the construction phase and the mine itself once commissioned.</p>	<p>Comment Noted</p>
<p>Frank and Antje Schidlowski 3 Krone Nature Village</p>	<p>That the value of our quality of life and our property will be affected by the planned mining activities.</p>	<p>This will be assessed as part of the impact assessment and mitigation and management measures will be recommended.</p>
<p>Jan Jacobus Van der Merwe</p>	<p>I have a vested financial and personal interest in a small portion of land located within the EPL 4013 area. I have been renting this portion of land for the past 5 years and intend to construct my personal retirement home at this location. I would like to know if the land I am renting would be affected by the mining activities and related infrastructure requirements. It would be good to know exactly where the planned mining</p>	<p>Additional Project specific information will be provided to the public in the scoping report. Various baseline and specialist studies will be conducted to better understand and gauge the impact that the mine will have on sensitive receptors such as the nearby settlements. Mitigation measures will then be recommended to minimise any identified impacts.</p>

Name and Stakeholder Details	Comment/Question Received	Response/Clarification
	activities and locations of infrastructure related to the mine will be and when this will commence.	
Bernd Röder Drie Krone Nature Estate	<ol style="list-style-type: none"> 1. Availability of groundwater. 2. Impacts on wildlife due to mining activities 3. Noise pollution 	Various baseline and specialist studies will be conducted to better understand and gauge the impact that the mine will have on sensitive receptors. Mitigation measures will then be recommended to minimise any identified impacts.
Evert Strydom	<ol style="list-style-type: none"> 1. Rangeland Restoration 2. Carbon Credits 3. Biodiversity Credits 	These will not be included as part of this assessment, however, this comment has been noted.
Johan Kotze Marula Game Ranch	<ol style="list-style-type: none"> 1. We operate a game farm and lodges. 2. Security towards some sensitive animals will be a threat. 3. Noise and air pollution will have an impact on the lodges 	Various baseline and specialist studies will be conducted to better understand and gauge the impact that the mine will have on sensitive receptors. Mitigation measures will then be recommended to minimise any identified impacts.

Table 2 - Comments and feedback from the public meeting.

Windhoek Scientific Society Tuesday 16 th of April 2023			
Name	Stakeholder Details	Comment/Question Received	Response/Clarification
Berny Röder	3 Krone Nature Village	Why does the BID say “Final for government submission”?	EAP Response: As part of the screening process, we submit an application form known as Form 1 along with the Background Information Document to the competent authorities: the Ministry of Mines and Energy (MME) and the Ministry of Environment, Forestry and Tourism (MEFT). For this reason, the status of the BID says “Final for government submission”.
		Has ECC conducted hydrological studies yet?	EAP response: We are currently in the scoping phase and therefore no baseline studies have been conducted yet. ECC is currently drafting the ToRs for the baseline/specialist studies and the ESIA. However, this is one of the specialist studies that will be conducted as part of the impact assessment. Furthermore, the proponent will not be using groundwater for their operations. Should any groundwater be utilized, the Proponent stated it will only be used for potable water needs in order to cater for the people working on the mine. The Proponent stated that the water to be used for operations will be acquired and pumped in from the Ujams wastewater plant located in northern Windhoek.

Windhoek Scientific Society Tuesday 16 th of April 2023			
Name	Stakeholder Details	Comment/Question Received	Response/Clarification
		Will the hydrological study be done by an independent consultant and will the specialist study be made available to us?	EAP Response: Yes, the study will be conducted by an independent sub-consultant with the assistance of our in-house hydrogeologist. These studies will be made available to the public for their review during the ESIA public review period.
		You will be using a significant amount of water for your low-intensity magnetic separation, and will that water come from the wastewater plant in Ujams?	Proponent Response: That is correct.
		Has ECC looked at the wildlife in the area and the effect mining activities may have on wildlife in the surrounding areas?	EAP Response: This will be looked at as part of the biodiversity (flora and fauna) assessment.
		Once the mine is in operation, there will be noise pollution. Will a noise assessment be conducted?	EAP Response: Yes, a noise assessment will be conducted.
		What will happen with the mine tailings? Would you be able to give us more details on what will happen with the tailings?	Proponent Response: The tailing fines will be kept in moistened condition as it is very fine and will be used for backfilling the pit
		Can the water from the tailings be re-used in mine operations?	Proponent Response: Yes, the tailing water will be recirculated back to the washing cycle.

Windhoek Scientific Society Tuesday 16 th of April 2023			
Name	Stakeholder Details	Comment/Question Received	Response/Clarification
Sven von Blottnitz	3 Krone Nature Village	Will the mining licence area include the entire EPL area (as the Drie Krone Nature Estate exists at the western portion of the current EPL 4013 boundary)?	Proponent Response: Jindal has not completed the exploration of the total areas in the EPL with the high confidence level. Part of the EPL which falls in farms Koanus, Helga and Woolfsgrund has been studied in detail and decided to have the mining footprint in those areas. The mining footprint won't affect Drie Krone Nature Estate exists at the western portion of the current EPL 4013 boundary
		Between the background information document and the presentation, there is a discrepancy between the sources of water, to do with the getting water.	EAP Response: The ESIA process is a progressive process in which information gets updated as it comes in. The BID was a drafted summary of the project, whereas the presentation provided more detailed information. The scoping report and ESIA may differ from the preceding reports as more studies are conducted by the EAP and proponent, and as more information becomes readily available.
Rodney bees		Where will the processing plant be situated?	Proponent Response: The conceptual plan of the processing plant falls within Woolfsgrund farm. However, the scoping & EIA studies will help in finalizing the detailed feasibility study of the processing plant.
		How many people will work or stay on-site?	Proponent Response: There will likely be between 50-100 people on-site at any given time. The total number of people to be employed by the mine will likely grow to some 800 people.

Windhoek Scientific Society Tuesday 16th of April 2023			
Name	Stakeholder Details	Comment/Question Received	Response/Clarification
		Where will people get water from?	Proponent Response: Potable water will be abstracted, however, if this option is not feasible then potable water will be brought to the site.
		Where will the main road be located leading to the mine?	Proponent Response: There is currently no layout for where the mining roads will go or where the entrance will be located (as this will be finalised as part of the road study still to be commissioned).
Mr. Robert Douglas Wirtz	Farm Koanus	When will the next meeting be and how often will these meetings be held?	EAP Response: There will be continuous engagement between ECC as the appointed Project EAP, the registered I&APs and the Proponent. Should additional meetings be requested or required, ECC will be able to arrange for and facilitate any additional public or focus meetings necessary.
		Will we receive the studies and the reports done for the ESIA process?	EAP Response: All studies and reports done throughout the ESIA process will be made available to the public and registered I&APs during the ESIA public review periods.
Arno [surname inaudible]		Why is there no one from the airport here?	EAP Response: The Namibia Airports Company (NAC) and the Namibia Civil Aviation Authority (NCAA) were identified as affected stakeholders and were both contacted and invited to this public consultation meeting. Direct consultation between ECC (the EAP), the Proponent, the NAC and the NCAA will be arranged as NAC and NCAA approval is

Windhoek Scientific Society Tuesday 16 th of April 2023			
Name	Stakeholder Details	Comment/Question Received	Response/Clarification
			required as per Namibia Civil Aviation Regulations (NAMCARs) Part 139 (Aerodromes).
		The mining operation will impact air quality which will impact airplanes and tourism for the country.	EAP Response: An air quality impact assessment will be conducted to assess prevalent wind direction and dust fallout. This study will also assess the impact operations may have on the nearby H.K. International Airport.
Mike Kibble		Which eight farms did Jindal drill on?	Proponent Response: We drilled in Woolfsgrund, Hohenau, Helga, Koanus, Hohewarte & Kameelbhul farms. It is only in these contiguous 6 farms where we worked in iron ore. Jindal did some geological prospecting works in the other two farms for Manganese in early 2012-2013 but those have been relinquished to the government.
		Where are the previous studies that were conducted as part of the drilling?	Proponent Response: Previous studies include geological mapping, regional geophysical studies, remote sensing and satellite image interpretation, and detailed ground geophysics based on the regional anomaly. Apart from that Jindal worked on the analysis of a few exposure samples before undertaking geological exploration/drilling work.
		Will there be further drilling done?	Proponent Response: The present resource statement has been derived from the measured and indicated resource categories. The confidence on the deposit increases in three-dimensional space based on the drill spacing and population of geological sample results. We have plan to continue the

Windhoek Scientific Society Tuesday 16 th of April 2023			
Name	Stakeholder Details	Comment/Question Received	Response/Clarification
			detail exploration where we have less confidence (inferred category). However, the mine development drilling and drill & blast will continue in the mine pit as the pit advances vertically and horizontally.
Mark Meynard		Will there be blasting studies done?	EAP Response: Yes, a blast and vibration study will be conducted.

2 ACKNOWLEDGEMENTS

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

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

APPENDIX A – ADVERTS

8 News & Features **Sun** **AgriBusiness** **Market Watch** **TUESDAY 2 APRIL 2024**

NOTICE OF AN OPEN PUBLIC CONSULTATION PROPOSED JINDAL IRON ORE PROJECT IN EPLs 4013 & 4194, KHOMAS REGION, NAMIBIA

Environmental Compliance Consultancy (ECC) provides interested members of the public an opportunity to comment on the application for an environmental assessment certificate in accordance with the Environmental Management Act, No. 107:2007 with a view to the proposed Jindal Iron Ore Project in EPLs 4013 and 4194, Khomas Region, Namibia. Members of the public are invited to register as interested and affected parties (I&AP) and submit their comments on the application and provide input into the assessment process.

Application: State Trading (S) (P) Ltd, Environmental Assessment Certificate (EAC) Application
Location: Khomas Region, Namibia
Proposed Activity: The proposed Jindal Iron Ore Project involves establishing an iron ore mining operation, comprising several open pits to be excavated using conventional blasting and drilling techniques. The open pits will be excavated and backfilled by a fleet of mobile equipment, with waste rock being transported to a waste rock dump (WRD) site. The extracted ore will undergo crushing and grinding at the beneficiation plant. Shovel by magnetic separation and subsequent reverse flotation and concentrate flotation complete the processing stages. The resulting product iron ore fines will then be transported to the State Trading (S) (P) Ltd port.

Project Location: The proposed project area is situated 10km east of Windhoek, Khomas Region (S24°33'N, 18°18'0"E). The project area is bounded by the EPLs.

Environmental Compliance Consultancy (ECC) provides interested members of the public an opportunity to comment on the application for an environmental assessment certificate in accordance with the Environmental Management Act, No. 107:2007 with a view to the proposed Jindal Iron Ore Project in EPLs 4013 and 4194, Khomas Region, Namibia. Members of the public are invited to register as interested and affected parties (I&AP) and submit their comments on the application and provide input into the assessment process.

Application: State Trading (S) (P) Ltd, Environmental Assessment Certificate (EAC) Application
Location: Khomas Region, Namibia
Proposed Activity: The proposed Jindal Iron Ore Project involves establishing an iron ore mining operation, comprising several open pits to be excavated using conventional blasting and drilling techniques. The open pits will be excavated and backfilled by a fleet of mobile equipment, with waste rock being transported to a waste rock dump (WRD) site. The extracted ore will undergo crushing and grinding at the beneficiation plant. Shovel by magnetic separation and subsequent reverse flotation and concentrate flotation complete the processing stages. The resulting product iron ore fines will then be transported to the State Trading (S) (P) Ltd port.

Project Location: The proposed project area is situated 10km east of Windhoek, Khomas Region (S24°33'N, 18°18'0"E). The project area is bounded by the EPLs.

Registration Number: 2022/0006
Ref: 25418 000 1000
Project ID: JN-IR-06-04-01-01-0

ECC

TE KOOP

SKOON ROLLE WIT KOERANTPAPIER VIR VELE GEBRUIKE

•PANEELKLOPPERS •NYWERHEDE •RESTAURANTE •SKOLE •VERPAKKINGSMATERIAAL per kg

Prys op aanvraag

SKAKEL AGNES: 330 500 OF CHANTEL: 330 502
2 - 4 EIDERSTRAAT, LAFREZ INDUSTRIEL

Namibian Stock Exchange Notice of Annual General Meeting
Tuesday, 30 April 2024

Notice is hereby given that the 32nd Annual General Meeting of the members of the Namibian Stock Exchange will be held on 30 April 2024 at 10:00 AM.

The meeting will be held virtually and/or at the NSX Boardroom No. 4 Robert Mugabe Avenue, Parking & access off Dr. Theo-Ben Gurrah Street, Windhoek, Namibia

Registration Deadline: Tuesday, 16 April 2024

Members must register to attend the AGM by emailing members@nsx.com.na and confirming the below details: (a) name of member, and (b) member representative

by no later than 16 April 2024

Annual Financial Statements will be available by 23 April 2024 at www.nsx.com.na

Tiaan Baxtin
CEO
Namibian Stock Exchange

OMEYA
HOME OWNERS ASSOCIATION

Job Advertisement

Position: Estate Manager
Location: Omeya Golf and Residential Estate
Company: Omeya Home Owners Association

Omeya Home Owners Association is seeking a highly skilled and experienced Estate Manager to oversee the operations and management of our estate. The ideal candidate will have a solid understanding of residential real estate, building regulations, financial administration, asset management, human resources, health and safety legislation, and property practitioners administration.

Key Responsibilities:

- Utilise experience in residential real estate and building regulations to ensure compliance and maintain the overall visual appeal of the estate.
- Manage general financial administration, procurement procedures, negotiations, and budgets effectively.
- Oversee asset management activities to optimize the value and performance of the estate.
- Handle human resource management and legislation to ensure a productive and harmonious working environment.
- Enforce health and safety legislation to guarantee the well-being of residents and staff.
- Ensure compliance with property practitioners administration and legislation.

Qualifications:

- Tertiary qualification in property/estate management or related field.
- Three to five years of experience in property or estate management, including infrastructure development, maintenance, security, municipal services, and health and safety.
- Technical aptitude and basic knowledge of plumbing and electrical systems.

Additional Skills and Abilities:

- Excellent communication and interpersonal skills.
- Strong organizational and leadership abilities.
- Proficiency in relevant software applications.
- Problem-solving and decision-making skills.
- Ability to work independently and as part of a team.

If you meet the qualifications and are ready to take on the challenge of managing our estate to the highest standards, we encourage you to apply. Please submit your resume and cover letter detailing your relevant experience and qualifications to: e-mail:estate@themanager.com.na

We look forward to receiving your application.

Omeya Home Owners Association is an equal opportunity employer. We celebrate diversity and are committed to creating an inclusive environment for all employees.

(Responsible for the Job)

DEB MARINE

EXPRESSION OF INTEREST

Post date of publication: 28 March 2024

DEB MARINE - LABORATORY ANALYSIS FOR THE DETERMINATION OF PHYSICAL, CHEMICAL AND BIOLOGICAL BY MARINE RESOURCES AND MANAGER SAMPLES.

DEB MARINE
Debmarmarine Namibia is a marine diamond recovery company operating in the Atlantic 1 Mining License Area (MLA1), Swakopmund, Namibia. The company is currently seeking a laboratory to provide analytical services for the determination of physical, chemical and biological by marine resources and manager samples. The laboratory will be responsible for the determination of physical, chemical and biological by marine resources and manager samples.

LABORATORY ANALYSIS
The scope of work will primarily focus on physical, chemical, and biological analysis of marine resources and manager samples. The requirements for laboratory services include, but are not limited to:

- **Physical Analysis:**
 - Particle size distribution analysis
 - Total Organic Carbon (TOC) analysis
 - Total Organic Nitrogen (TON) analysis
 - Trace metals analysis
 - Elemental analysis (C, H, N, S)
- **Biochemical Analysis:**
 - Sediment and water analysis

LABORATORY ANALYSIS FOR THE DETERMINATION OF TOC, TON, AND TRACE METALS
The laboratory should possess the necessary accreditations and certifications, such as ISO 17025, for the aforementioned analytical methods. Furthermore, Debmarmarine Namibia requires a laboratory with experienced personnel who can provide prompt and accurate analytical results, as well as the associated method data sheets, identification of results interpretation and reporting.

LABORATORY ANALYSIS FOR THE DETERMINATION OF PHYSICAL, CHEMICAL AND BIOLOGICAL BY MARINE RESOURCES AND MANAGER SAMPLES
The laboratory should possess the necessary accreditations and certifications, such as ISO 17025, for the aforementioned analytical methods. Furthermore, Debmarmarine Namibia requires a laboratory with experienced personnel who can provide prompt and accurate analytical results, as well as the associated method data sheets, identification of results interpretation and reporting.

DEB MARINE
Debmarmarine Namibia will not be responsible for any costs incurred in the preparation and submission of a response to this Expression of Interest and furthermore reserves the right to extend this Expression of Interest into any future tenders, negotiations and/or engagements. Debmarmarine Namibia will not accept submissions received after the closing date and time.

DEB MARINE

2 **Republicain Sun** 15 **Algemeine Zeitung** Market Watch WEDNESDAY 10 APRIL 2024

Save the number
085 785 6231
Send Finance or
scan on the QR code

Economic Indicators

Exchange Rates

Currency	Spot	Currency	Spot	Forward Cover	1M	3M	6M	12M
USD/NAD	18.99	NAD/NAD	0.00	USD/ZA R	16.07	16.055	16.240	16.320
EUR/NAD	20.092	NAD/GBP	0.080	EUR/ZA R	20.476	20.391	20.444	19.894
GBP/NAD	22.410	NAD/JPY	0.259	GBP/ZA R	24.077	23.709	23.676	23.06
NAD/CHF	0.048	NAD/JPY	0.25	ZA R/JPY	1.957	1.763	1.676	1.540

*Exchange rate (left/right) for ZAR only is applied!

DATE: 10/04/2024 - 16:20 PM

COMPANY NEWS IN BRIEF



REUTERS/NOOR SHAARI/VEE PHOTO

ZIMBABWE'S NEW ZIG CURRENCY STARTS TRADING
Zimbabwe's new gold-backed currency started trading on Monday amid doubts that the country's third such re-launch in a decade will have any more success in ending repeated, crippling bouts of high inflation. The Zimbabwe Gold (ZIG) was announced on Friday by the central bank with an initial rate of 13.56 to \$1, replacing the Real Time Gross Settlement Dollar (RTGS), which had lost about 80% of its value this year and had been trading at 28,720 to US\$1 before the change. Bank balances were transferred into the new currency over the weekend while their customers will have 21 days to do so, said the

bank. Zimbabwe will enter circulation at the end of this month, according to the Reserve Bank of Zimbabwe. The RTGS, also known as the Zimdollar, was launched in 2019 after a decade of dollarisation, which included so-called bond coins and bond notes, notably pegged to the US dollar and introduced in 2014 and 2016 respectively.

SUB-SAHARAN AFRICA GROWTH NOT ENOUGH TO DENT POVERTY, SAYS WORLD BANK

Economic growth is set to rise for the next two years in Sub-Saharan Africa, but not enough to make a significant dent in poverty on the continent, the World Bank said in a report on Monday. The region's economy is set to expand 3.4% this year and 3.6% in 2024 as falling inflation boosts private consumption, up from 2.4% in 2023, the World Bank said in its biannual Africa's Pulse report. Many countries in Sub-Saharan Africa were hit hard by the shocks of COVID-19 and Russia's war in Ukraine, which pushed up inflation at the same time as rising global interest rates made borrowing prohibitively expensive. Drought and conflict have also affected swathes of the region. "Growth is set to bounce back in Sub-Saharan Africa but the recovery is still fragile," the report said. "The pace of economic expansion in the region remains slow and insufficient to have a significant effect on poverty reduction." "Per capita GDP growth of 1% is associated with poverty reduction of only 1% in the

region, compared to 2.5% in the rest of the world." South Africa's growth rate is forecast to double in 2024, but just to 1.2%, while Angola's is set to pick up to 2.8% from 0.6% last year, driven mainly by the oil sector and falling oil production.

NIGERIA BANS LENDERS FROM USING US-DENOMINATED COLLATERAL FOR HAIRA LOANS

Nigeria's central bank has banned commercial lenders from accepting foreign currency-denominated collateral to grant hair-ra loans, a move that could protect the banking system against a strengthening of the local currency, it said on Monday. The regulator said in

a circular that the practice it had observed of bank customers using foreign currency as collateral for hair-ra loans was "prohibited". The central bank on Monday said it approved Eurobonds issued by the government or letters of credit issued by an offshore bank as eligible foreign currency collateral. It told lenders to wind down all loans currently secured with dollar-denominated collateral within 90 days or face sanctions. The sabra has gained sharply against the dollar on both the official and parallel markets after suffering its second devaluation in less than a year in January. The currency strengthened after the central bank raised interest rates in February and March, and lifted restrictions on foreign participation at its fixed-income auctions.



REUTERS/APOLAB SOURCE

CAREER OPPORTUNITY

Aligned with Africa's Growth Strategy to drive its regional growth beyond the borders of South Africa, Medscheme has established a strong presence in Namibia. Medscheme Namibia is looking for the right person to develop over 41 point of operating within the private healthcare sector.

The following position is currently open for the **Senior Manager: Managed Care**.

Key roles of the position:
The successful incumbent will lead the managed care operations teams and provide support to other departments, manage resources, processes and budgets in order to deliver customer-centric quality experience, ensuring that the operations team is aligned to the strategic and short-term strategic objectives.

Responsibilities include but are not limited to:
• Manage, supervise and coordinate activities of the Managed Care Department
• Analyse financial performance, identify trends, forecast, and provide
• Manage and monitor customer data
• Regularly review and coordinate with various internal stakeholders
• Manage and provide advice on reporting financial, operational and equipment managed care activities that will assist on member health and costs of healthcare.

Requirements:
• 10 years' managed health care experience including 5 years at a management level - Business Management and/or clinical degree
• Knowledge of Namibian labour legislation
• Should be fluent in English with able to communicate with various staff levels
• Experience in a health care environment
• Strong analytical skills
• Excellent verbal and written communication skills
• Strong project management skills

For confidential applications please send a brief CV to hr@medscheme.com.na. Remember to quote reference Job Title.

Reference will be given to suitable qualified individuals. The successful candidate will be notified.

Application closes **Tuesday 16 April 2024**.

NOTICE OF AN OPEN PUBLIC CONSULTATION ON PROPOSED EPL FOR THE PROJECT ON EPLS 4013 AND 4194, KHOMAS REGION, NAMIBIA

Environmental Compliance Consultancy (ECC) provides the following information to the public that an application for an environmental assessment certificate is submitted to the Environmental Management Act No. 1 of 2007 with the mine for the proposed iron-ore project on EPLs 4013 and 4194, Region, Namibia. Members of the public are invited to register their comments and attend public meetings and provide input into the environmental assessment certificate application process.

Applicant: State Trading Phosphate
Environmental Assessment Practitioner (EAP): Environmental Compliance Consultancy (Pty) Ltd
Location: Khomas Region, Namibia

Proposed Act: The proposed applicant for the project is establishing an iron-ore mining operation, comprising several open pits to be excavated using conventional blasting and cutting techniques. The area under excavation will be bounded by a line of earth retention walls, with waste rock being transported to a waste rock dump (WRD). The excavated area will undergo creating an open-pit mining site remediation plan, followed by magnetic separation and subsequent iron-ore extraction and recovery through the final processing stages. The resulting product, iron ore fines, will then be transported to a nearby deep-sea port for shipment.

Project location: The proposed project area is situated 20km east of Windhoek, Khomas Region (S21 03'51, E17 01'37). The project area is bounded by the C25 main

Public Meeting: Windhoek
17 April 2024
10:00hrs to 12:00hrs
Jansz Windhoek
18-20 April Windhoek
Socetech Society

Register & Attend:
1. Register as an EAP
2. Register in the project at <https://www.environment.gov.na/epa/epa-portal>
3. Register as a stakeholder at <https://www.environment.gov.na/epa/epa-portal>
or call 061 200 1000

1. Registered EAPs will receive a project background information document (PID).

In addition to the above meetings, State Trading Phosphate is committed to engaging affected stakeholders through planned and ongoing public participation throughout.

Environmental Compliance Consultancy (Pty) Ltd
Address: P.O. Box 1163, Sunnyside
Email: info@ecc.com.na
Cell: [+264812001000](tel:+264812001000)
Website: www.ecc.com.na

Registration Number: 2022/0055
Tax ID: 5218 0001008
Project ID: ECC-148-464-MT-05-0

APPENDIX B- STAKEHOLDER LETTERS

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



ECC-148-464-LET-07-A

28 March 2024

Identified stakeholder and potential interest or affected party for:

The Proposed Jindal Iron Ore Project on EPLs 4013 and 4194, Khomas Region, Namibia.

RE - NOTIFICATION OF AN ENVIRONMENTAL ASSESSMENT OF THE PROPOSED JINDAL IRON ORE PROJECT ON EPLS 4013 AND 4194, KHOMAS REGION, NAMIBIA, AND AN INVITATION TO SCHEDULED PUBLIC CONSULTATION MEETINGS.

Dear Sir or Madam,

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Jindal Mining Namibia (Pty) Ltd, which operates under Jindal Steel and Power (Mauritius) Limited (JSPML), as its independent environmental assessment practitioner. ECC is conducting an environmental and social impact assessment (ESIA) as part of the mining licence application for the proposed Jindal Iron Ore Project on EPLs 4013 and 4194, in the Khomas Region, Namibia. The ESIA is being conducted as part of the application for an environmental clearance certificate in terms of the Environmental Management Act No. 7 of 2007. Brake Trading (Pty) Ltd is the holder of the EPLs in a joint venture (JV) between JSPML, which holds an 85% stake in Brake Trading (Pty) Ltd and exercises managerial authority over the company, Alexander Adolf Warne, who owns a 10% stake, and Phoenix Minerals DMCC, UAE, which owns the remaining 5%.

The project area is 50km east of Windhoek, Khomas Region (-22.617436, 17.569706). The EPL is bordered by the C23 main road and is 9 km from the Hosea Kutako International Airport, the stakeholder map is attached.

The proposed Jindal Iron Ore project involves establishing an iron ore mining operation, comprising several open pits to be excavated using conventional blasting and drilling techniques. Ore and waste rock will be excavated and hauled by a mobile equipment fleet, with waste rock being transported to a waste rock dump (WRD) site. The extracted ore will undergo crushing and pebble milling at the beneficiation plant, followed by magnetic separation and subsequent reverse flotation and concentrate filtration during the final processing stages. The resulting product, iron ore fines, will then be transported by rail or road to Walvis Bay for shipment.

The Background Information Document (BID) provides further project details and the scope of the assessment, which can be downloaded from the link provided below:

<https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-the-jindal-iron-mine-khomas-region-namibia/>

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



This letter is intended to engage potentially interested and affected parties (IAPs) for the Project and provide a communication channel to ECC for the ESIA process. You have been identified as an interested or affected party and therefore ECC wishes to inform you of how you can be involved with the ESIA. As part of the assessment, ECC herewith cordially invite you as an identified stakeholder, interested or affected party to the public engagement meetings scheduled for the following dates:

Public Meeting

Date: 16 April 2024
Venue: Windhoek Scientific Society
110 Robert Mugabe Avenue, Windhoek
Time: 18:30

Public participation is an important part of the ESIA process, as it allows the IAPs to obtain information about the proposed project and provide feedback. Communication with the IAPs occurs at various stages throughout the Project lifecycle. IAPs can interact with the ESIA process by, registering as IAPs for the project via the ECC website as per the link provided below:

<https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-the-jindal-iron-mine-khomas-region-namibia/>

If you are unable to complete the registration form online, please contact us via email for assistance at info@eccenvironmental.com, or alternatively call our office at +264 81 669 7608.

Should you require our assistance with the details contained within this letter, please do not hesitate to contact us and we will gladly assist.

We look forward to hearing from you at your earliest convenience.

Yours sincerely,

Stephan Bezuidenhout
stephan@eccenvironmental.com

Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com

APPENDIX C- SITE NOTICES

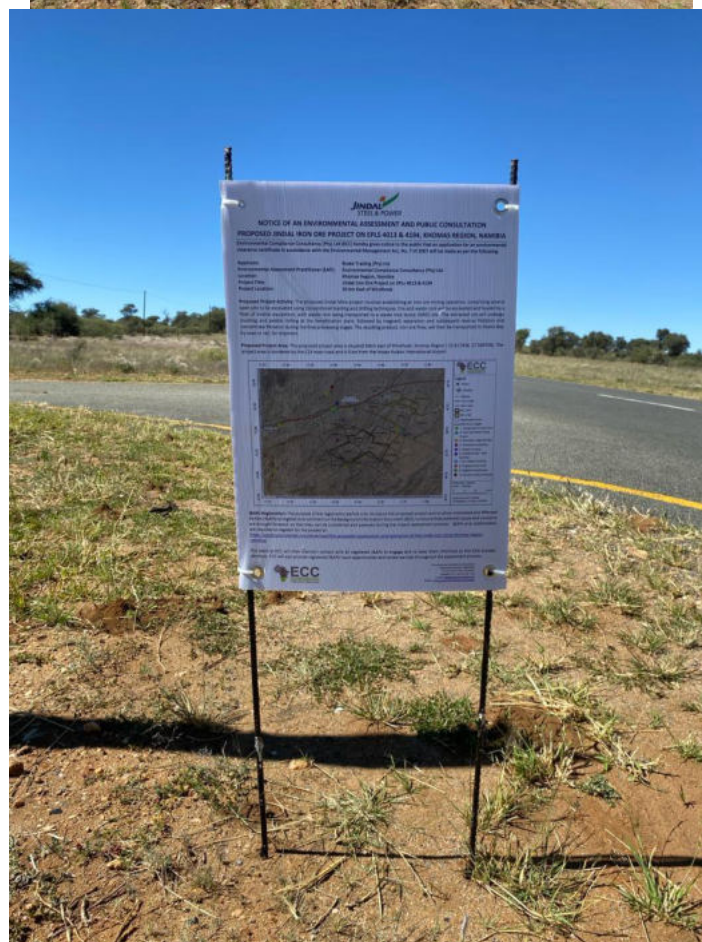
Site Notice Board #1: B6-C23 T-Junction

Lat/Long Coordinates: -22.53426 °N and 17.33206 °E



Site Notice Board #2: C23

Lat/Long Coordinates: -22.64608 °N and 17.39842 °E



Site Notice Board #3: B6 and M51 T-junction

Lat/Long Coordinates: -22.48901 °N and 17.49563 °E



Site Notice Board #4: M51

Lat/Long Coordinates: -22.53537 °N and 17.59080 °E



Site Notice Board #5: B6 (across from the Windhoek International Airport)

Lat/Long Coordinates: -22.49762 °N and 17.46299 °E



APPENDIX D- BID



Submitted to: Jindal Steel and Power (Mauritius) Limited.
Attention: Mr Debananda Tripathy
P O Box 31490
Pionerspark
Windhoek, Namibia.

BACKGROUND INFORMATION DOCUMENT:

JINDAL MINE PROJECT ON EPLS 4013 AND 4194, KHOMAS REGION, NAMIBIA

PROJECT NUMBER: ECC-148-464-REP-02-D
REPORT VERSION: REV 02
DATE: 19 MARCH 2024

The proposed Project BID can be downloaded on ECC's website via the following link:

<https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-the-jindal-iron-mine-khomas-region-namibia/>

APPENDIX E- ATTENDANCE REGISTERS



+264 81 669 7608

info@eccenvironmental.com

www.eccenvironmental.com



Meeting Attendance Register

Date: 16 April 2024

Meeting Subject: ECC: Jindal Iron Ore Mine ESIA Public Meeting

Venue: Windhoek Scientific Society

	NAME	ORGANISATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	S. Voigts	VoigtzooD	STEPHAN VOIGTS @GMAIL.COM	081-1244430	S. Voigts
2					
3					
4					
5					
6					
7					
8					
9					
10					



+264 81 669 7608

info@eccenvironmental.com

www.eccenvironmental.com



Meeting Attendance Register

Date: 16 April 2024

Meeting Subject: ECC: Jindal Iron Ore Mine ESIA Public Meeting

Venue: Windhoek Scientific Society

	NAME	ORGANISATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	<i>H. Hamman</i>		<i>hendrik.hamman@gmail.com</i>	<i>081 2150539</i>	<i>[Signature]</i>
2	<i>M. KIBBLE</i>		<i>kibble@progress-safaris.com</i>	<i>0811276924</i>	<i>[Signature]</i>
3	<i>Ewert Stynlan</i>	<i>Rangeland Institute</i>	<i>event@rangeland.africa</i>	<i>0814844102</i>	<i>[Signature]</i>
4	<i>A. Schidlowski</i>	<i>3 Kroue</i>	<i>anjiesglobalnet@gmail.com</i>	<i>0811043226</i>	<i>[Signature]</i>
5					
6					
7					
8					
9					
10					



+264 81 669 7608

info@eccenvironmental.com

www.eccenvironmental.com

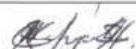
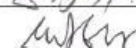
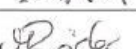
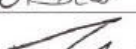


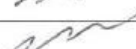

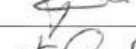


Meeting Attendance Register

Date: 16 April 2024

Meeting Subject: ECC: Jindal Iron Ore Mine ESIA Public Meeting

Venue: Windhoek Scientific Society

	NAME	ORGANISATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Vekunda Kahjcha	Bellatrix SME Finance	kekujaha@bellatrixcap.com	0812097806	
2	Sven von Boppwitz	3Krone Resident	svenvonb@tutis@gmail.com	0811232334	
3	Marianne Röder	3Krone Resident	roederbema@outlook.com	0811288982	
4	Bernd Röder	"	"	0811281895	
5	R.D. WIRTZ	Farm ROANUS	RW@FWAY.NA	0811276159	
6	B. BEREMAN	" HELGA	BERG@FWAY.NA	0811292422	
7	R. HALENKE	" HOENAU	REINER@HALENK.COM	0812600892	
8	J. Kotze	MARUCK GRANCH	JK@MARUCKPARK.COM	0811294326	
9	K. Simson	Sisa Namandje AG	kulu@sisanamandjeini.com	0818936888	
10					



+264 81 669 7608

info@eccenvironmental.com

www.eccenvironmental.com



Meeting Attendance Register

Date: 16 April 2024

Meeting Subject: ECC: Jindal Iron Ore Mine ESIA Public Meeting

Venue: Windhoek Scientific Society

	NAME	ORGANISATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	J. Brummund	Farm Bismarck	j.brumm@pt.com.na	081 386 3000	[Signature]
2	A.F. Gous	Farm Brack	gandee@platinium.com.na	081 644 3070	[Signature]
3	Kl Gous	Brack 458	willem3@pts.nam.com	081 222 1231	[Signature]
4	Ute Mehnert	Drie Kromen Nature Village	ute.mehnert@gmx.de	081.8188567	[Signature]
5	Marc Mehnert	Pfickrose Nature Village	marc.mehnert@gmx.de	081-3684821	[Signature]
6	B Bergmann	Farm Helga	bergie@iway.na		[Signature]
7	H.G Romm	Farm Neu Brack	g.romm@iway.na	081 252 1881	[Signature]
8	E.W Romm	Farm Binxentien	ewromm@iway.na	081 231 230	[Signature]
9	H Romm	Farm Neu Brack	hgaromm@gmail.com	081 4685027	[Signature]
10	R Goldman	Etangpaul	rhg@ofcl.com.na	081 129 3007	[Signature]

PHOTOS OF 16 APRIL 2024 PUBLIC CONSULTATION MEETING:





APPENDIX F- I&AP REGISTRATION FORMS AND LIST



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC- 148-464 – ESIA

Project Title: The proposed construction and operation of Jindal Iron Ore Mine on EPLs 4013 and 4194

Applicant: Brake Trading (Pty) Ltd

This form serves to register Interested and Affected Parties (IAPs) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision-making process.

INTERESTED AND AFFECTED PARTIES (IAP) DETAILS	
Title (Mr/Mrs/Dr/Prof):	<i>M.</i>
First Name:	<i>Ernst</i>
Surname:	<i>Romeis</i>
Cellphone:	
Telephone other:	<i>061 231 230</i>
Email Address	<i>ew.romeis@eway.na</i>
Postal Address	<i>158 Windhoek</i>
Organisation and/or property description (if landowner/lawful occupier)	<i>Farm Binsekhain +Humboldtstr 456</i>
Stakeholder Group (please tick)	<input checked="" type="checkbox"/> Member of Affected Community <input type="checkbox"/> Non-Government Organisation (NGO) <input type="checkbox"/> Provincial or Government Official <input type="checkbox"/> Local or District Official
GENERAL INTEREST IN THE PROJECT	
Please describe the nature of your interest in the project	



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC- 148-464 – ESIA

Project Title: The proposed construction and operation of Jindal Iron Ore Mine on EPLs 4013 and 4194

Applicant: Brake Trading (Pty) Ltd

This form serves to register Interested and Affected Parties (IAPs) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision-making process.

INTERESTED AND AFFECTED PARTIES (IAP) DETAILS	
Title (Mr/Mrs/Dr/Prof):	MS.
First Name:	KULA
Surname:	SIMSON
Cellphone:	+264 81 8936888
Telephone other:	+264 61 259848
Email Address	kula@sisanamandjeinc.com
Postal Address	
Organisation and/or property description (if landowner/lawful occupier)	SISA NAMANDJE & CO INC (LAW FIRM) ON BEHALF OF LAWFUL OCCUPIER
Stakeholder Group (please tick)	<input checked="" type="checkbox"/> Member of Affected Community <input type="checkbox"/> Non-Government Organisation (NGO) <input type="checkbox"/> Provincial or Government Official <input type="checkbox"/> Local or District Official
GENERAL INTEREST IN THE PROJECT	
Please describe the nature of your interest in the project	



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC- 148-464 – ESIA

Project Title: The proposed construction and operation of Jindal Iron Ore Mine on EPLs 4013 and 4194

Applicant: Brake Trading (Pty) Ltd

This form serves to register Interested and Affected Parties (IAPs) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision-making process.

INTERESTED AND AFFECTED PARTIES (IAP) DETAILS	
Title (Mr/Mrs/Dr/Prof):	<i>M.</i>
First Name:	<i>Hagen</i>
Surname:	<i>Romuis</i>
Cellphone:	<i>081 968 9027</i>
Telephone other:	<i>/</i>
Email Address	<i>hagenromuis@gmail.com</i>
Postal Address	<i>P.O. Box 905 2HK.</i>
Organisation and/or property description (if landowner/lawful occupier)	<i>farm. New Breed 454</i>
Stakeholder Group (please tick)	<input checked="" type="checkbox"/> Member of Affected Community <input type="checkbox"/> Non-Government Organisation (NGO) <input type="checkbox"/> Provincial or Government Official <input type="checkbox"/> Local or District Official
GENERAL INTEREST IN THE PROJECT	
Please describe the nature of your interest in the project	



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC- 148-464 – ESIA

Project Title: The proposed construction and operation of Jindal Iron Ore Mine on EPLs 4013 and 4194

Applicant: Brake Trading (Pty) Ltd

This form serves to register Interested and Affected Parties (IAPs) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision-making process.

INTERESTED AND AFFECTED PARTIES (IAP) DETAILS	
Title (Mr/Mrs/Dr/Prof):	<i>Mr.</i>
First Name:	<i>Hermann Gerhard</i>
Surname:	<i>Romuis</i>
Cellphone:	<i>081 252 1881</i>
Telephone other:	<i>061 234 777</i>
Email Address	<i>gromuis@ewag.na</i>
Postal Address	<i>372 WAG.</i>
Organisation and/or property description (if landowner/lawful occupier)	<i>Farm Nou Brand no. 454</i>
Stakeholder Group (please tick)	<input checked="" type="checkbox"/> Member of Affected Community <input type="checkbox"/> Non-Government Organisation (NGO) <input type="checkbox"/> Provincial or Government Official <input type="checkbox"/> Local or District Official
GENERAL INTEREST IN THE PROJECT	
Please describe the nature of your interest in the project	



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

PROJECT DETAILS

ECC Project Reference: ECC-148-464 – ESIA

Project Title: The proposed construction and operation of the Jindal Iron Ore Mine, Khomas Region, Namibia

Applicant: Brake Trading (Pty) Ltd

This form serves to register Interested and Affected Parties (IAPs) for the above-mentioned project(s) and to solicit input and participation. This form will be submitted to the competent authority for consideration in the decision-making process.

INTERESTED AND AFFECTED PARTIES (IAP) DETAILS	
Title (Mr/Mrs/Dr/Prof):	DR WEDER, KAUTA & HOVEKA INC.
First Name:	
Surname:	
Cellphone:	081 215 9724
Telephone other:	061 275 550
Email Address	louw@wkh-law.com // moolman@wkh-law.com
Postal Address	PO Box 864/822 WINDHOEK
Organisation and/or property description (if landowner/lawful occupier)	
Stakeholder Group (please tick)	<input checked="" type="checkbox"/> Member of Affected Community <input type="checkbox"/> Non-Government Organisation (NGO) <input type="checkbox"/> Provincial or Government Official <input type="checkbox"/> Local or District Official
GENERAL INTEREST IN THE PROJECT	
Please describe the nature of your interest in the project	We represent a number of Land owners which are affected by the project



INTERESTED AND AFFECTED PARTIES REGISTRATION FORM

GENERAL INTEREST IN THE PROJECT	
Do you have any specific concerns associated with the Project (for example: water, soil, pollution, cultural or historical)?	SEE LETTERS ADDRESSED TO ECC.
If you know of anyone else who should be informed about the project, please provide their contact details:	
Title (Mr/Mrs/Dr/Prof):	
First Name:	
Surname:	
Cellphone:	
Telephone other:	
Email Address:	
Postal Address:	
Organisation and/or property description (if landowner/lawful occupier	

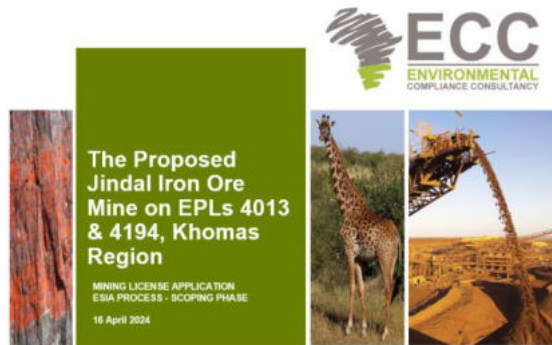
ECC respectfully request that you please sign this letter and return it to info@eccenvironmental.com to confirm that you have received notification about the above and to ensure that your comments, concerns or objections are recorded. All comments, queries and concerns must be received via this IAP registration form and questionnaire or alternate means. Please note that only registered IAPs will be included in future correspondence regarding this process.

Signed  Name JANE LOUW Date 20/08/24

Registered I&APs (via online, email, letter or phone call registration):

Name	Organisation
Antje Schidlowski	3 Krone Nature Village
Bernd Röder	3 Krone Nature Village
Marianne Röder	3 Krone Nature Village
Berny Röder	3 Krone Nature Village
Sven von Blottnitz	3 Krone Nature Village
Vekunda Kakujaha	Bellatrix SME Finance City of Windhoek
Sisa Namandje	COMSAR Properties
Ndelimona lipinge	EIA Tracker (Namibia Environment and Wildlife Society)
R. Gellman	Etango Ranch Etango Ranch Guest Farm
C.W. Romais	Farm Binsenheim
J. Bremmand	Farm Bismarck-Grasland
Andre F. Gous	Farm Brack
Willem Gous	Farm Brack 438
Jorn Bremmand	Farm Grasland 80
B. Bergmann	Farm Helga
Rainer Halenke	Farm Hohenau
Talitha Harmse	Farm Koanus
R.D. Wirtz	Farm Koanus
Mrs Moolman	WKH Inc Legal Practitioners
Ms Louw	WKH Inc Legal Practitioners
Jorn Bremmand	Farm Neu Bismark 426
H.G. Romais	Farm Neu Brack
H. Romais	Farm Neu Brack 454
Johan Koetze	Farm Otjimukona 532
Johan Koetze	Farm Rainhof 123 Farm Sonnleiten Guest House
Johan Koetze	Farm Wolfsgrund 122 Gmunder Lodge Heja Lodge Hohewarte Guestfarm Khomas Regional Authority
Johan Koetze	Marula Game Ranch
Amwele Lovisa	Namibia Airports Company (NAC)
Alexander Gairiseb	Namibia Airports Company (NAC)
H.K. International Airport	Namibia Airports Company (NAC)
Dennis F. Gaingob	Namibia Civil Aviation Authority (NCAA) Namibia Power Corporation (NamPower) Okabis Hunting Ondekarenmba - One Namibia Our Habitas Namibia
Evert Steplan	Perivoli Rangeland Institute
Hendrik Hamman	Private Individual
Jan Jacobus Van der Merwe	Private Individual
Mike Kibble	Progress Farming (PTY) Ltd
Sonja Kibble	Progress Farming (PTY) Ltd
Antje Kesselmann	Progress Farming Co. (Pty) Ltd
Kula Simson	Sisa Namundje & Co.
Ute Mehnert	Ute Mehnert
Stephan Voigts	Voigtland Guesthouse

APPENDIX G- PUBLIC MEETING PRESENTATION



Agenda

- Meeting Objectives
- Project Presentation – Presented by Brake Trading (Pty) Ltd
- Environmental & Social Impact Assessment (ESIA) Process – Presented by ECC
- Baseline/Specialist Studies – Presented by ECC
- Potential Biophysical & Socio-economic impacts – Presented by ECC
- Q&A



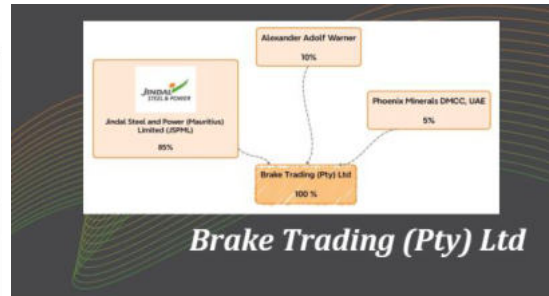
Public meeting objectives

- Inform the public and provide information detailing the proposed Jindal Iron Ore Mine on EPLs 4013 & 4194.
- Provide an overview of the Environmental and Social Impact Assessment (ESIA) process.
- Take into consideration all **public concerns, questions and comments to incorporate them into the environmental assessment process.**

3

www.eccenvironmental.com 4

Locality and Stakeholder Map



SHARE HOLDING OF ACTIVE LICENSES:

Brake Trading (Pty) Ltd holds EPL 4013 and EPL 4194, located in Dordabis, in the Eastern area of the province of Khomas region.

Jindal Steel and Power (Mauritius) Limited (JSPML) has an 85% shareholding in Brake Trading and has the management control.

S.No.	Interested Commodity	EPL holding Company	EPL Number	Area	Share pattern of EPL holding Company
1.	Iron Ore	Brake Trading (Pty) Limited	4013	21679.92 (ha)	JSPML - 85%, Alexander Adolf Warne - 10%, Phoenix Minerals DMCC - 5%
2.	Iron Ore	Brake Trading (Pty) Limited	4194	21290.29 (ha)	JSPML - 85%, Alexander Adolf Warne - 10%, Phoenix Minerals DMCC - 5%



Milestones achieved:

2013

- Company Inception
- Licenses Acquisition

2013 to 2016

- Regressive Exploration
- Ground Geophysics
- Drilling in 6 farms

2016 to 2021

- Field operations on hold due to fall in iron ore price
- Renewal of the Licenses
- Internal Scoping Studies

2021 to 2023

- Due-diligence of the project data through independent consultants
- Phase-II: Drilling, trenching Activities.
- Competent Person's Report-Geological Resources.

ON-GOING ACTIVITIES

2023-24

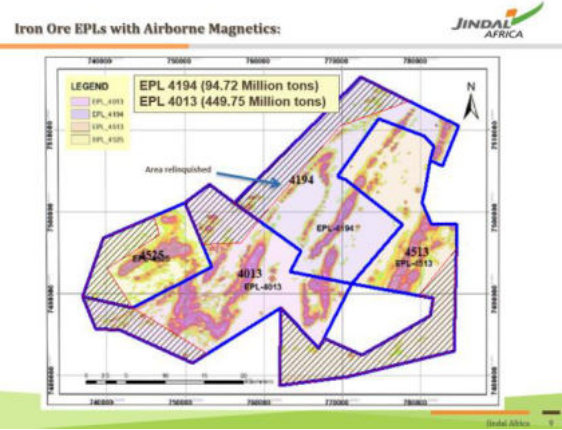
- Magnetic separation study
- Petitionation Study
- Completion of Geotechnical Study
- Award of contract for EIA/EEMP Study
- Detail Feasibility Study

2024-25

- Completion of logistics Study
- Completion of Supporting Documents
- Filing of Mining License Application
- Approval from local authorities.
- Consultant engagement

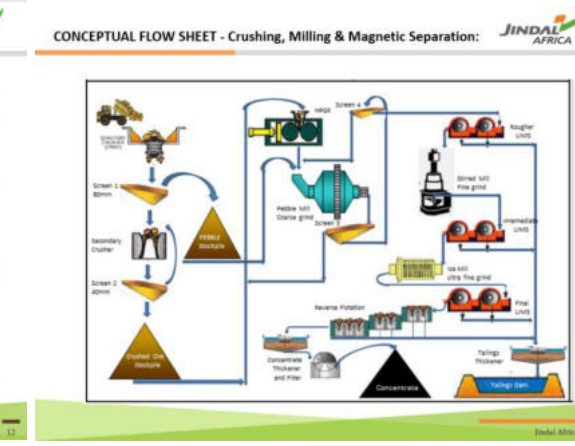
2025-27

- Completion of DFS Report.
- Initial Infrastructure plan for mining & processing
- Development of Mine Infrastructure.
- Development of Processing Plant
- Opening of Box cut.
- Production & Export



EXPLORATION ACTIVITIES AND RESULTS:

Sl. No.	EPL	Exploration Progress	Head Grade	Recovery	Product Grade	Possible / Indicated Resources in EPL	CPR Resources.
1	4013	Ground Mag - 2484.54 box KM Drilling - 118 09m; 17196.83 in No. of Trenches - 28; 2316 m No. of Samples - 8407	Fe - 27.26% SiO2 - 40.87% Al2O3 - 8.78% P - 0.2029% S - 0.0404%	22.92% @ 3890c	Fe - 69.03% SiO2 - 2.73% Al2O3 - 0.46% P - 0.0199% S - 0.0022%	Magnetic Anomaly: 83.1 kA Average Thickness: 32.12m Average SPG: 3.37 g/cc Depth Consideration: 50m Resource: 449.75 million tons*	CPR - Received EIA/EEMP - by Dec-24 KOAANUS - 298 MT
2	4194	Ground Mag - 892.68 box KM Drilling - 34 09m; 12094.52 in No. of Trenches - 36; 1170m No. of Samples - 4115	Fe - 29.34% SiO2 - 34.88% Al2O3 - 6.09% P - 0.446% S - 0.1239%	23.96% @ 3890c	Fe - 66.09% SiO2 - 4.22% Al2O3 - 0.57% P - 0.0274% S - 0.0226%	Magnetic Anomaly: 29.0 kA Average Thickness: 19.88 m Average SPG: 3.46 g/cc Depth Consideration: 50m Resource: 94.72 million tons*	CPR - Received EIA/EEMP - by Dec-24 HELGA - 42 MT



CURRENT ACTIVITIES:

Department: Civil, Mining and Process Engineering

GEOTECHNICAL AND PIT OPTIMIZATION STUDY

MAGNETITE LIBERATION TEST WORK ON BULK SAMPLES

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

Facility Study Overview:

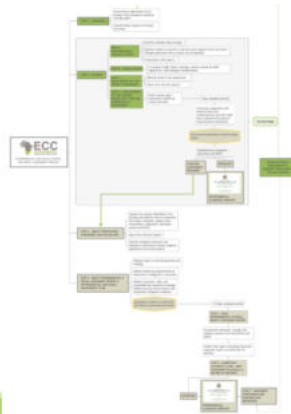
SI. No.	Responsible	Source	Action Completed	Required
WATER	City of Windhoek	Waste Water Treatment Plant	LOI Received	0.75 - 0.9 Ml/min MF
	NAMPORER	Nampower/African Grid Imports	Application Requested	
POWER	Private Power Producers	Own Power Generation (PUs/Generators)	LOIs Received from 3 Parties	20 MW
	TRANSPORT	None by Rail siding	Option 1: Rolling stocks, Upgradation by Road Option 2: Rolling stocks, Upgradation by Transshipment Option 3: Sharing Capital (Negotiations)	10-15 KM from pit to rail siding 100-400 KM from Rail siding to Port siding.
PORT	GRANROD	Harbour	LOI received for 100,000 MT couple facility	2.00 Ml/min/Year
PORT SIDING	City of Windhoek	None (Land to be purchased)	Feasibility study	2.00 Ml/Year

Environmental Assessment Practitioner (EAP)

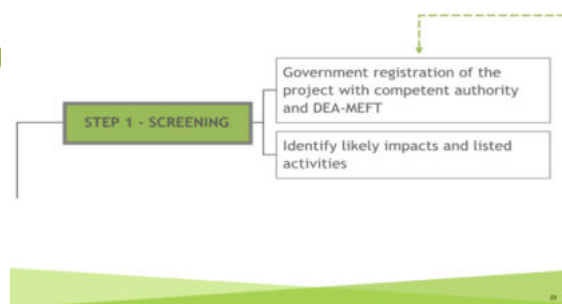
- Environmental Compliance Consultancy Pty Ltd (ECC)
- Independent, objective and unbiased
- Evidence and risk-based approach
- Leverage Namibian public, local stakeholder and specialist knowledge and expertise to guide the ESIA process
- Request active public and stakeholder participation throughout the ESIA process

ESIA Process

1. Screening: *Complete*
 - DEA Portal (APP – 003097)
2. Scoping: *Current Phase*
 - Public Participation
 - Develop Terms of Reference (ToR) for the full ESIA
 - Conduct Baseline and Specialist Studies
3. Assessment Phase: *To come*



Step 1 - Screening Phase



ECC Application Triggers

- Screening (DEA PORTAL)

ACTIVITIES THAT TRIGGERED A CLEARANCE CERTIFICATE APPLICATION	EIA SCREENING FINDING
ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES	<ul style="list-style-type: none"> • The mine will connect to the NamPower grid. • There is a possibility that a solar power station will be constructed for the generation of electricity. • The generated electricity will be used to supply electricity to the mine and the potential surplus redirected into the grid power system.
WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES	<ul style="list-style-type: none"> • The proposed mining operations and process plant triggers this activity, as both fuel and hazardous substances are required for mining and processing activities. • A lined tailings storage facility will be constructed. • Licenses will be obtained for all hazardous substances that will need to be stored on the site. • Additionally, there will be a laboratory on site that may generate hazardous waste.

ECC Application Triggers



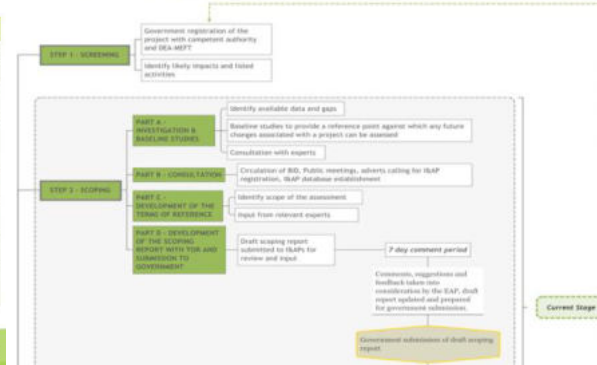
ACTIVITIES THAT TRIGGERED A CLEARANCE CERTIFICATE APPLICATION	EIA SCREENING FINDING
MINING AND QUARRYING ACTIVITIES	<ul style="list-style-type: none"> This listed activity refers to the provisions of the Minerals (Prospecting and Mining) Act 33 of 1992. The project is a mine, which therefore triggers this listed activity. The mine infrastructure will include mine pits, dump facilities, stockyards, mining office, workshop, admin building, health & safety wing, laboratory, canteen, processing plant, conveyor line, filter press yard, concentrate yard, and dispatch line. This Project falls within a water-controlled area. Ground and surface water may be abstracted or sourced for the operation. Groundwater will be abstracted to support the operational activities through identified abstraction boreholes, with an approved abstraction permit, from the Department of Water Affairs, as required by the Water Act, No. 54 of 1995 and Water Resources Management Act. Surface water may be abstracted from the Curob dam for operational activities.
WATER RESOURCE DEVELOPMENTS	<ul style="list-style-type: none"> Potential Diversion of the Otjantsa River as this river runs through the planned open pit areas. Process water ponds will be constructed to provide water for the processing plant. A pollution control dam (PCD) will be constructed to catch and contain dirty water on site, this is in the processing plant. Pipeline systems will be used to transport water or slurry within the site. Wastewater from the Umas wastewater treatment plant The processing plant will require approximately 1.0 to 1.5 Mm³/annum of water.

ECC Application Triggers



ACTIVITIES THAT TRIGGERED A CLEARANCE CERTIFICATE APPLICATION	EIA SCREENING FINDING
FORESTRY ACTIVITIES	<ul style="list-style-type: none"> Vegetation clearing will be required for site construction and infrastructure establishment. The proposed mining operations and processing plant trigger this activity, as both fuel and hazardous substances are required for mining and processing activities. Bulk fuel will be stored onsite for refuelling the mining fleet of approximately 30,000-50,000 L/day in the first year of operation.
HAZARDOUS SUBSTANCES TREATMENT, HANDLING AND STORAGE	<ul style="list-style-type: none"> Consumer installation certificates are required for bulk fuel storage and dispensing. Licenses will be obtained for all hazardous substances that will need to be stored on the site. An onsite metallurgical laboratory will be required for site operations and small quantities of various lab chemicals will be used and stored on site.
INFRASTRUCTURE	<ul style="list-style-type: none"> Towers for communication will need to be constructed, thus cables and telecommunication lines will be put in place. Powerlines and telemetry for operational requirements, water and tailings slurry pumping will be required. Possible Diversion of the M51 roadway.

Step 2 – Scoping Phase



Public Notification & Participation



- Notification of the Project: newspaper adverts, site notices and identified stakeholder letters sent.



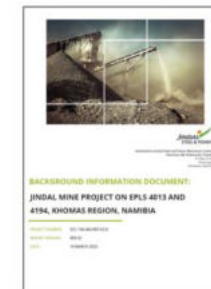
Site Notices



Public Consultation Meeting

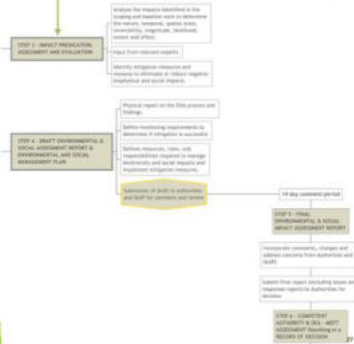


- Background Information Document (BID):** provides I&APs with information to take part in the public participation process.
 - BID available on ECC website.
- Public & Stakeholder Consultation Meeting:**
 - Tonight's presentation highlights information from the BID.
 - Applicant can present the project to the public.
 - I&APs can ask questions directly to applicant.



Assessment Phase

1. Screening: Completed
2. Scoping: Current Phase
3. Assessment and Evaluation:
 - Baseline & Specialist studies
 - Predict & quantify impacts
 - Evaluate alternatives
 - Assign mitigation measures
 - Develop monitoring and rehabilitation plans
4. Draft the ESA report and Environmental and Social Management Plan (ESMP)
5. Submit Final Report to competent authorities
6. Receive Record of Decision



Baseline & Specialist Studies



BASELINE STUDIES	SPECIALIST
A baseline fauna and flora	Peter Cunningham
Detailed groundwater and surface water	ECC
A noise baseline study	ECC and/or AirShed
An air quality baseline study	AirShed
A heritage baseline study	Dr. Alina Nienkele
A high-level socio-economic baseline study	ECC
Traffic and Transport study	Innovative Transport Solutions
Visual baseline study	ECC

Potential Impacts to be Assessed



Potential project impacts include (but are not limited to):

- Visual impacts
- Water resource impacts
- Noise impacts
- Air quality impacts
- Impacts to tourism
- Archaeological and cultural feature impacts
- Biodiversity impacts
- Increased traffic & rail impacts
- Economic growth & job creation potential (permanent and temporary employment)
- Carbon emission impacts
- Safety considerations for existing infrastructure and residents



ESIA & ESMP



Integration of Stakeholder and Specialist Input:

- Consider and incorporate input from all stakeholders and specialists.

Inclusion of Recommended Mitigations:

- Ensure that all the identified and recommended mitigations are included.

Please Remember to Register as an I&AP

How to Register?

- **Via the ECC website**, under "Projects":
<https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-the-jindal-iron-mine-khomas-region-namibia/>
- **Via telephone or WhatsApp**: +264 81 669 7608
- **Via email**: info@eccenvironmental.com
- *Or speak to us after tonight's meeting concludes*

Jindal Africa Corporate Video



www.eccenvironmental.com

Questions / Discussion ?



Thank You For Your Time!



Contact Us:
Tel: +264 81 669 7608
info@eccenvironmental.com





Submitted to: Jindal Mining Namibia (Pty) Ltd.
Attention: Mr Debananda Tripathy
P O Box 31490
Pioneers Park
Windhoek, Namibia.

REPORT:

ADDENDUM TO THE SCOPING REPORT - JINDAL IRON ORE MINE PROJECT ON EPLS 4194 AND 4013

PROJECT NUMBER: ECC-148-464-REP-20-D

REPORT VERSION: REV 03

DATE: 2 SEPTEMBER 2024



TITLE AND APPROVAL PAGE

Project Name: Addendum to the scoping report - Jindal Iron Ore Mine Project on EPLs 4194 and 4013

Client Company Name: Jindal Mining Namibia (Pty) Ltd.

Client Name: Mr Debananda Tripathy

Ministry Reference: APP-004009

Authors: Monique Jarrett, Matt Totten Jr and Jessica Bezuidenhout

Status of Report: Rev03/Final for Government Submission

Project Number: ECC-148-464-REP-20-D

Date of issue: 2 September 2024

Review Period N/A

ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:

We welcome any enquiries regarding this document and its content. Please contact:



Environmental Compliance Consultancy
PO Box 91193, Klein Windhoek, Namibia
Tel: +264 81 669 7608
Email: info@eccenvironmental.com

DISCLAIMER

The report has been prepared by Environmental Compliance Consultancy (Pty) Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the accuracy, completeness, or currency of the information cannot be guaranteed.

TABLE OF CONTENTS

1	Introduction	5
1.1	Purpose of the comments consolidation report	5
2	Summary of comments from I&APs	6
2.1	Introduction	6
2.2	Key feedback on issues of concern	6
2.3	Summary of feedback from the revised draft scoping report.....	7
3	Draft scoping report – comments and responses.....	10
4	Acknowledgements.....	22

LIST OF FIGURES

Figure 1 - WKH email sent to ECC on the 24th of May 2024.	23
Figure 2 - Letter to the MME Mining Commissioner sent from WKH Legal Practitioners on 16 July 2024.....	26
Figure 3 - Letter to ECC sent from WKH Legal Practitioners on 18 July 2024.	28
Figure 4 - MC response letter to WKH on the 22nd of July 2024.	29
Figure 5 - WKH response letter to MC on the 30th of July 2024.	31
Figure 6 - 5 August 2024 ECC Response Letter to WKH Legal Practitioners’ 18 July 2024 Letter.	34
Figure 7 - WKH Letter sent to ECC on the 20th of August 2024 via email.	38
Figure 8 - I&AP Comments Letter sent to ECC on 5 July 2024.....	39

LIST OF TABLES

Table 1 - I&AP comments and responses from comments received on 5 July 2024:	10
Table 2 - A summary of the communications between WKH, the EAP and the MC – MME.....	15

APPENDICES

Appendix A – Letters received from I&APs	23
--	----

ABBREVIATIONS

Abbreviation	Description
CV	curriculum vitae
EAP	environmental assessment practitioner
EC	Environmental Commissioner
ECC ₁	Environmental clearance certificate
ECC ₂	Environmental Compliance Consultancy
EMA	Environmental Management Act No. 7 of 2007
EPL	Exclusive prospecting licence
ESIA	Environmental and social impact assessment
ESMP	Environmental and social management plan
GDP	Gross domestic product
FYPG	Farm Progress Private ICAO Identifier
FYWH	Hosea Kutako International Airport ICAO Identifier
H.K.I.A.	Hosea Kutako International Airport
I&APs	Interested and affected parties
ICAO	International Civil Aviation Organisation
MC	Mining Commissioner
MEFT	Ministry of Environment, Forestry and Tourism
MME	Ministry of Mines and Energy
WKH	Dr Werder, Kauta & Hoveka Legal Practitioners

1 INTRODUCTION

1.1 PURPOSE OF THE COMMENTS CONSOLIDATION REPORT

This document has been compiled following the required period of review to be provided for public and registered interested and affected parties (I&APs) to have access to and opportunity to comment in writing on the draft scoping report for the Jindal Iron Ore Mine on EPLs 4194 and 4013 (the Project) before submission to the Environmental Commissioner.

The revised draft scoping report was completed for the Project and undertaken in accordance with the requirements of the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act (EMA), 2007 (Act No. 7 of 2007).

This document compiles all comments received during the public review periods from registered I&APs during the first and second rounds of public review of both revision 1 (Rev01) and 2 (Rev02) of the draft scoping report; and presents the responses from ECC as the appointed environmental assessment practitioner (EAP) for the Project, Jindal Mining Namibia (Pty) Ltd (herein referred to as the Proponent) and specialists engaged in the assessment.

2 SUMMARY OF COMMENTS FROM I&APS

2.1 INTRODUCTION

In accordance with the Regulations of the EMA 2007, on the 21st of June 2024, the draft scoping report was circulated electronically to all registered interested and affected parties (I&APs) and identified key stakeholders for a period of 14 days (from 21 June 2024 to 5 July 2024). Submissions received from individuals were collated in a separate “Comments and Responses” table presented in Table 1. On the 12th of July, the final scoping report was also circulated to registered I&APs. Upon receiving feedback from the I&APs, this final scoping report was amended and then re-circulated to I&APs as the revised draft scoping report for another round of public review on the 13th of August for a period of 7 days (from 13 August 2024 to 20 August 2024). Submissions received from I&APs are collated in a separate “Comments and Responses” table presented in Table 2.

2.2 KEY FEEDBACK ON ISSUES OF CONCERN

The draft scoping report was provided to all I&APs, identified stakeholders and made publicly available on ECC’s website. This public review period is set out to solicit comments, and feedback, and allow genuine participation in the final phase of the ESIA process. The key area raised from the review of I&AP comments can be summarised as follows:

Impact of the Project on Biodiversity and Local Tourism

The Project is located in a prominent tourism hotspot, surrounded by numerous high-end lodges, guesthouses, and hunting farms. The potential impacts of the Project on local biodiversity and Tourism expressed by I&APs include:

- Increased dust affecting air quality,
- Elevated noise levels from blasting and truck movements,
- Light pollution,
- Land clearing impacting biodiversity,
- Increased crime and poaching.

The value offered by these establishments is largely derived from the scenic aesthetics of the biophysical environment in which they are situated. The construction and operation of the project may adversely impact the area's aesthetics and biodiversity by obstructing scenic views, driving away wildlife, increasing light pollution, and elevating dust and ambient noise levels. This may reduce the value of these properties and diminish their attractiveness as eco-tourist destinations, resulting in a loss of revenue for affected businesses and adversely impact the tourism industry in the area.

Various specialist assessments have been scoped and are now underway to understand the extent of the identified impacts as well as the best ways to mitigate and manage them.

Displacement of Residents from their Homes

The EPLs comprise several farms and residential properties. Many of the affected farmers and residents worry that they will ultimately be displaced from their homes and farms due to the Project's impacts and operations. Farm owners and residents have expressed strong concerns over the potential displacement from their homes due to the proposed development of a mine on their properties. They fear the loss of their homes, and livelihoods, which are intrinsically linked to the land they have occupied for several decades. The prospect of being uprooted from their communities and the disruption of their tourism and agricultural activities are major points of distress.

The proponent understands and deeply respects the concerns expressed by farm owners and residents regarding potential displacement from their homes due to the Project. It is not the Proponent's intention to disrupt the lives and livelihoods of the community. The Proponent is committed to working collaboratively with all stakeholders to find mutually beneficial solutions. This includes exploring alternative land use plans, offering fair compensation, and ensuring that any relocation, if absolutely necessary, is conducted with utmost care and respect for the affected families.

2.3 SUMMARY OF FEEDBACK FROM THE REVISED DRAFT SCOPING REPORT

The general concerns from Dr Werder, Kauta and Hoveka Inc. Legal Practitioners, Notaries and Conveyancers (herein referred to as WKH), on behalf of their clients, whom now includes the majority of private farm owners which the boundaries of EPLs 4013 and 4194 surround or are located adjacent to, focus on potential "material irregularities" regarding the renewal of EPL 4013 by the MME, the procedure followed by the EAP in conducting the ESIA public consultation process, as well as additional environmental and social impact concerns regarding the proposed Project. The full summary of the communications between WKH, the EAP and the Mining Commissioner (MC) of MME is detailed below in Table 2.

Renewal and non-reduction of EPLs 4013 and 4194:

Letters sent by WKH to the MC on 24 April 2024, 16 July 2024 and 30 July 2024, detail WKH's investigation into the renewals of EPL 4013 and EPL 4194. WKH's 16 July 2024 letter details that EPL 4013 was renewed six times from 19 June 2008 to 6 November 2024, allegedly in excess of the legally permissible limit in accordance with the Minerals (Prospecting and Mining) Act, 1992 Section 71, with EPL 4013 receiving an additional four-month extension from November 2024 to March 2025. Moreover, EPL 4013 was renewed for prospecting area sizes that allegedly do not comply with the prescribed limits outlined in the Act. WKH subsequently requested proof of the Minister's approval as required under sections 71(2) and 71(2)(b) of the Act, as well as the signed meeting minutes held to confirm such approval made by the Minister of MME.

The MC responded to WKH's 24 April 2024 letter on 22 July 2024 with a letter stating that the Minister has the authority to renew a licence if deemed desirable and in the interest of

developing the mineral resource, even beyond a third renewal, without a specified timeframe. In the case of EPLs 4013 and 4194, the MC stated that the discovery of a mineral resource required further exploration activities to fully assess the resource, leading to the renewal of the EPLs.

On 30 July 2024, WKH sent a response letter to the MC regarding the MC's 22 July 2024 response letter alleging that, based on WKH's inspection of the MME's file on EPL 4013, the renewals and non-reduction of the EPL 4013 prospecting area was done contrary to law because the Mining Commissioner acted *ultra vires* and outside the scope of his authority, because the Minister had not granted the approvals required by the Act. WKH further requested the MC provide WKH, in respect of both the decision to approve the renewals as well as the decision which led to the non-reduction of the prospecting area for EPL 4013, with the approvals granted by the Minister and the signed and approved minutes of the relevant meetings where such approval was granted.

Procedure followed by the EAP for the ESIA public consultation process as per the EMA and its associated regulations:

On 15 April 2024, WKH notified ECC that they were acting on behalf of their client, Mr. Robert Douglas Wirtz, the owner of Farm Koanus No. 121. WKH requested, in accordance with sub-regulation 21(2), confirmation of whether the following public consultation measures were followed:

- Posting notice boards in a publicly visible location.
- Providing written notice to the owners and occupiers of land adjacent to the site, the local authority council, regional council, traditional authority, and any other relevant state body.
- Publishing advertisements once a week for two consecutive weeks in at least two national newspapers.

WKH also requested a list of all Interested and Affected Parties (I&APs) who were notified about the project as well as access to the I&AP register. WKH also stated that the above-mentioned notices must indicate that the application will be submitted to the Environmental Commissioner. ECC responded to WKH on 24 May 2024 with a letter providing proof of all the measures complied with as stipulated in sub-regulation 21(2) of the Regulations.

Furthermore, in a letter sent to ECC on 18 July 2024, WKH requested that the EAP disclose to the competent authority and Environmental Commissioner (EC) all material information in the possession of the EAP that reasonably has or may have the potential of influencing any decision to be taken with respect to the Project application, in accordance with sub-regulations 4(c) and (d) of the Environmental Impact Assessment Regulations No. 30 of 2012. Regarding the final scoping report submitted to the competent authority and circulated amongst I&APs, in the same letter, WKH also noted that the CV of the EAP who prepared the report was not included, as required by sub-regulation 8(a), and that its annexures did not

contain the letter sent by WKH to the EAP on 15 April 2024 nor the email sent by WKH to ECC on 24 May 2024. Proof of the above mentioned was requested of the EAP by WKH.

In a response letter sent to WKH on 5 August 2024, ECC confirmed that all material information was shared with MME, MEFT, and registered I&APs. ECC acknowledged that the "Appendix - EAP CVs" was not included in the table of contents of the scoping report, but that EAPs are required to submit the annexure to MEFT when uploading the final scoping report via the MEFT online portal. ECC further informed WKH that the inclusion of "Appendix - EAP CVs" would be included in a revised draft version of the scoping report that would be re-circulated for a second public review period. ECC further explained that WKH's communications were excluded from the public consultation document since WKH was not currently registered as an I&AP, but would be added with WKH's consent. ECC also invited WKH to register as an I&AP for the proposed Project and provided WKH with the relevant registration form to do so.

Revised Draft Scoping Report I&AP Comments:

On 20 August 2024, WKH sent ECC a letter registering WKH as an I&AP as well as stating that WKH is now authorised to represent the following affected farm owners:

- Mr Robert Douglas Wirtz of Farm Koanus No 121
- Ms Antje Kesselmann of Farm Progress No 506
- Mr Rainer Halenke of Farm Hohenau No 81
- Mr Johan Kotze of Farm Wolfsgrund No 122, Farm Rainhof No 123, and Farm Otjimukona No 532
- Mr Jorn Bremmand of Farm Grasland No 80 and Farm Neu Bismark No 426

Furthermore, WKH requested that all letters between WKH and the MC should be disclosed to the EC by the EAP, that WKH may institute formal legal action against the MC, and that WKH continues to engage with the MC regarding the alleged material irregularities with regard to the renewal and non-reduction of EPL 4013.

Regarding WKH's EAP public consultation process concerns, WKH requested that the EAP amend the revised final scoping report and annexures to include:

- The issues raised in WKH's 15 April 2024 letter and 24 May 2024 email to ECC,
- WKH's concerns regarding the potential impact on property values of affected farms,
- WKH's request for additional environmental impact specialist studies,
- The location of potentially affected graves, and
- Additional general concerns.

These requested revisions have been included in this Rev03 Addendum to the Scoping Report Annexure in this section, Table 2 below, and Appendix A below.

3 DRAFT SCOPING REPORT – COMMENTS AND RESPONSES

Table 1 - I&AP comments and responses from comments received on 5 July 2024:

Stakeholder Details	I&APs Question/Comment	EAP Response
Renate and Wolfgang Raith Sonja and Mike Kibble with Cara and Alec Antje and Heiko Kesselmann with Luca and Leo	About 30 graves from the previous century	<p>A heritage/archaeological assessment will be conducted to identify and assess potential impacts on archaeological/heritage resources arising from the proposed activities. Mitigation and management measures recommended as an outcome of the assessment will be incorporated into the Project’s environmental management plan.</p> <p>The location of the suggested 30 graves has been requested by the EAP from the I&AP who submitted this comment.</p>
Gabriela and Jürgen Senke with Luke Mike Kibble Safaris / Progress Farming & Guest Farm / Progress Park & Fly / Progress Private Airfield (FYPG)	Complete destruction of environment to operate exclusive hunting safaris	A biodiversity assessment will be conducted to define the bio-physical (vertebrate fauna; including avian species & flora) environment relevant to the project area(s) and assess the significance and impact of construction and long-term operation of the various project components on the fauna and flora at the proposed site. Mitigation and management measures recommended as an outcome of the assessment will be incorporated into the Project’s environmental management plan.
	Loss of natural surroundings to operate guest farms for international tourists	A visual assessment will be conducted to evaluate the potential visual effects of a proposed development or project on the landscape and viewsheds. Mitigation and management measures recommended as an outcome of the assessment will be incorporated into the Project’s environmental management plan.

Stakeholder Details	I&APs Question/Comment	EAP Response
	Drop of water level of entire area	<p>A hydrological and hydrogeological impact assessment will be conducted to assess surface and groundwater quality and quantity relevant to the Project while assessing the significance of development and environmental impact that the Project may have on the hydrological/hydrogeological environment and other users at the proposed Project site.</p> <p>A geochemical impact assessment will be conducted to assess the potential of waste rock to produce acid that may lead to acid mine drainage during leech events and the impacts that this may have on the biotic and hydrologic/hydrogeological environments and provide mitigation measures.</p>
	Large-scale water & aquifer contamination	
	Large scale air & dust pollution (also for international airport)	<p>An air quality assessment will be conducted to evaluate the potential air quality impacts of the Project on surrounding sensitive receptors, including residents, local projects/businesses, local aerodromes (e.g. FYWH and FYPG) and the tourism sector.</p>
	Sharp increase in poaching, trespassing	<p>Security measures will be implemented to monitor the access of individuals to the camp and mine site, including rigorous checks for those entering and leaving. Mine employees will travel by company-arranged buses to and from the camp at the end of their shifts. Employees will undergo search procedures on entering and leaving the site. The workers will have access to various amenities such as three meals per day, laundry and cleaning services, recreational activities, and a kiosk, which will provide for their basic needs within the camp.</p>
	Sharp increase in criminal activities	

Stakeholder Details	I&APs Question/Comment	EAP Response
	Loss of our family home for 40 years (40+ family members)	Should anyone need to be relocated, or any business be lost due to the operation of the mine, reasonable compensation will be provided.
	Loss of farmyard to operate our park & fly business	
	Our workers and their families loose their homes (about 20 people)	
	Loss of our entire cattle farming operation, running in excellent condition for over 40 years	A Socio-economic impact assessment will be conducted to evaluate the current socio-economic state of the area and its inhabitants. Should anyone need to be relocated, or any business be lost due to the operation of the mine, reasonable compensation will be provided.
	Loss of our ability to produce food for Namibia	
	10 employees loose their permanent work	Should anyone need to be relocated, or any business be lost due to the operation of the mine, reasonable compensation will be provided.
	Significant noise pollution, spoiling our country environment	A noise impact assessment will be conducted to assess the potential noise impacts of the proposed project on surrounding sensitive receptors, including residents, businesses, wildlife, and the tourism sector. While identifying potential impacts, the assessment will also evaluate increased noise effects, and provide recommendations to manage and mitigate these impacts.
	Impact on gravel road M51	A traffic assessment is being conducted for potential traffic impacts of the proposed project on surrounding sensitive receptors, including residents, businesses, commuting traffic, and the tourism sector. Mitigation and management measures recommended as an outcome of the assessment will be incorporated into the Project's

Stakeholder Details	I&APs Question/Comment	EAP Response
		environmental management plan. Additionally, the mine will ensure the continued maintenance of the M51.
	Loss of private airfield for flying	<p>An air quality assessment will be conducted to evaluate the potential air quality impacts of the Project on surrounding sensitive receptors, including residents, local projects/businesses, local aerodromes (e.g. FYWH and FYPG) and the tourism sector.</p> <p>Should an airfield need to be relocated, or any aviation related business be lost due to the operation of the mine, reasonable compensation will be provided.</p>
	Current lifestyle estate plans in the pipeline now impossible	Comment noted.
	Loss of fencing, infrastructure, buildings, pipelines, water installations	Should there be any damage to local infrastructure by the mine, reasonable compensation will be provided.
	What assurance do we have that local Namibians and NOT foreigners /Mauritians / Indians will be employed?	The proponent is committed to prioritizing local hiring and ensuring that the benefits of this project are realized within the Namibian community. Furthermore, the Proponent has established a local hiring policy that prioritizes Namibian candidates for all job openings. This policy is designed to maximize the employment opportunities for local residents and ensure that the community directly benefits from the mine's operations.
	In the past, during the initial prospecting phase, Jindal lost the court case due to numerous transgressions. So, if that is their track record, how will the rest going to be?	<p>The Proponent has confirmed that this comment is misrepresented as there is no court case.</p> <p>Jindal has been operating in a responsible manner internationally operating in several jurisdictions and international operations.</p>

Stakeholder Details	I&APs Question/Comment	EAP Response
		<p>Furthermore, the Proponent will comply with all relevant Namibian regulations, are committed to following international and Namibian mining best practices and standards and are doing a robust ESIA to ensure all potential environmental and socio-economic impacts are identified, addressed and mitigated through a robust Environmental and Social Management Plan (ESMP).</p> <p>If there is a Jindal related court case that are aware of, please feel free to inform the EAP with specific details.</p>
	<p>Blasting process's impact on buildings, the international airport and its effect on tourism as the biggest contributor to GDP</p>	<p>A blast and vibration assessment will be conducted to assess the impacts of blasts and vibrations that emanate from operations at the proposed Jindal Iron Ore Mine site on nearby farms, communities, lodges, wildlife and the H.K.I.A. The assessment will evaluate the cumulative impacts of project operations and provide recommendations to manage the potential effects.</p>
	<p>Concern about the ability to rehabilitate the area at the end of the mining phase</p>	<p>Ways in which to rehabilitate during and post-closure will be looked at as part of the closure plan which will be developed to meet the standards requirements of the draft Namibian Mine Closure Framework and international best practices before the construction and operation of the mine take place.</p>

Table 2 - A summary of the communications between WKH, the EAP and the MC - MME.

Summary of Letter	Response
<p><u>WKH Letter sent to ECC on the 15th of April 2024 via email (included in Attachment B – Public Consultation Document to the revised draft scoping report)</u></p>	
<ul style="list-style-type: none"> • Letter submitted in reference to stakeholder letter submitted on the 28th of March 2024 to potentially interest and affected parties. • WKH submitted a letter to the EAP informing the EAP that they were acting on behalf of their client Mr. Robert Douglas Wirtz, owner of Farm Koanus No. 121. • WKH requested in terms of sub regulation 21(2), whether the following public consultation measures were adhered to: <ul style="list-style-type: none"> ○ Fixing of notice boards in a conspicuous place to the public ○ Giving written notice to the owners and occupiers of land adjacent to the site, local authority council, regional council, traditional authority and any other organ of state having jurisdiction in respect to any activity ○ Advertisements once a week for two consecutive weeks in at least two national newspapers. • Provide a list of a all I&APs, that were notified and request access to I&AP register. • The abovementioned notices must state that the application is to be submitted to the Environmental Commissioner. 	<p>The EAP sent a response letter to WKH via email on the 24th of May 2024.</p> <p>The letter detailed the steps taken by the EAP to fulfill sub regulation 21(2) of the EMA (included in Attachment B – Public Consultation Document to the revised draft scoping report).</p>

WKH Letter sent to the MC (MME) on the 24th of April 2024 via email (included in Attachment B – Public Consultation Document to the revised draft scoping report)	
<ul style="list-style-type: none"> • WKH submitted a letter to the MC informing the MC that they were acting on behalf of their client Mr. Robert Douglas Wirtz, owner of Farm Koanus No. 121. • EPLs 4013 and 4194 held by brake Trading (Pty) Ltd were renewed several times over a period of 17 years, ten years in excess of the legally permissible limit in accordance with the Minerals (Prospecting and Mining) Act, 1992 (herein referred to as the Act), Section 71. • WKH further requested proof of the ministerial approval as per Section 71 (2) of the Act. 	<p>The EAP did not respond to this letter as it was addressed to the Mining Commissioner, however this letter has been included in the revised draft scoping report Attachment B – Public Consultation Document submitted to both the MC at MME and the EC at MEFT for their review.</p>
WKH email sent to ECC on the 24th of May 2024 (Figure 1)	
<ol style="list-style-type: none"> 1. Please see attached hereto our letter submitted to the Commissioner of Mines, for your records. 2. Kindly furnish us with a reply to our letter sent on 15 April 2024. 	<p>The EAP responded to this email on the 24th of May with the requested response letter to WKH’s letter sent to the EAP on the 15th of April 2024.</p>
WKH Letter sent to the MC (MME) on the 16th of July 2024 (Figure 2)	
<ul style="list-style-type: none"> • Was a follow up letter to the letter sent to the MC on the 24th of April 2024. • The letter furthered WKH’s investigation into the renewals of EPL 4013 and EPL 4194. Of which EPL 4013 had been renewed six times as well as renewed for an additional 4 months from November 2024 to March 2025. • Further to this, EPL 4013 was renewed for prospecting area sizes contrary to the prescribed sizes contained in the Act. 	<p>The EAP did not respond to this letter as it was addressed to the Mining Commissioner, however this letter has been included in the revised draft scoping report Attachment B – Public Consultation Document submitted to both the MC at MME and the EC at MEFT for their review.</p>

- WKH subsequently requested the approval granted by the Minister as per section 71(2) and 71(2) (b) of the Act.

WKH Letter sent to ECC on the 18th of July 2024 via email (Figure 3)

- This letter requested for proof that all material information received by the EAP from the Proponent should be disclosed to the EC as per sub regulations 4 (c) and (d) of the Environmental Impact Assessment Regulations No. 30 of 2012 (herein referred to as the Regulations).
- With regard to the final scoping report submitted:
 - the CV of the EAP who prepared the report could not be located as per sub regulation 8(a).
 - The scoping report and the attached annexures did not include the letter sent by WKH to the EAP on the 24th of May 2024.
- Proof of the abovementioned point was requested.

The EAP submitted a response to this WKH letter via email on the 5th of August 2024 (shown in Figure 6). In the EAP's response letter:

- The EAP informed WKH that all material information within their possession has been disclosed to MME as the competent authority, MEFT and registered I&APs.
- The EAP informed WKH that EAP CVs are submitted as part of the ECC application on the MEFT portal, but thanked WKH for noting that the EAP CVs were not listed as an appendix in the scoping report and assured WKH that this would be rectified, and a revised scoping report would be re-circulated for another round of public review.
- Regarding the claim that material issues raised in WKH 15th of April 2024 letter and 24 May 2024 email were omitted from the scoping report Appendix B – Public Consultation Document, the EAP informed WKH that WKH had not, to date requested to be registered as an I&AP and therefor, communications between WKH and the EAP were not included in the public consultation document. However, upon request and with WKH's consent, these communications would be included in the public comments document and addendum report as appendices to the revised scoping report. This was included in the revised scoping report.
- The EAP also encouraged WKH to officially register as an I&AP and provided the I&AP registration form.

MC response letter to WKH on the 22nd of July 2024 (Figure 4)

- The MC informed WKH that the Minister has the right to renew a licence if it is desirable and in the interest of the development of the mineral resource on a third or subsequent number of occasions.
- In regard to EPLs 4013 and 4194, due to the mineral resource discovered, more exploration activities were necessary to delineate the resource and thus the EPLs were renewed.

WKH submitted a response to this letter to the MC on the 30th of July 2024 (shown in Figure 5).

- WKH informed the MC, that the MC at the time of the renewals acted outside of their jurisdiction as the granting of the additional years, beyond the 7 years stated in the Act as well as the approval of the non-reduction of the EPLs was only the Minister's right to grant such extensions.
- The proof of the approvals by the Minister as stated being attached to the MCs letter was not attached.
- WKH requested proof of the approval of the renewal and non-reduction of EPL 4013 by the Minister as well as proof of the signed and approved minutes of the relevant meetings where such approval was granted.

WKH Letter sent to ECC on the 20th of August 2024 via email (Figure 7)

This WKH letter was in response to the EAP's 5th of August 2024 letter.

- WKH is now authorized to represent Mr Robert Douglas Wirtz of Farm Konanus No. 121, Ms Antje Keselmann of Farm Progress No.

EAP Response:

506, Mr Rainer Halenke of Farm Haohenau No. 81, Mr Johan Kotze of Marula Game Ranch, Farm Wolfsgrund No. 122, Farm Rainhof No. 123, and Farm Otjimukona No. 532, and Mr Jorn Bremmand of Farm Grasland No. 80 and Farm Neu Bismark No. 426.

Continued engagement with the MC

- Submission of letters to the EAP documenting the communication between WKH and the MC of MME.
- Request of receipt of proof that the above letters submitted to the EAP have been submitted to the EC of MEFT

Scoping Report and concerns

- WKH requested a revision of the scoping report to include all letters and annexures submitted to the EAP.
- In terms of the Gazette 8402 of 2024 and per section 4 (1)(b) of the Local Authorities Act, 1992 the boundaries of the local authority of Windhoek have been altered to add Farm Koanus No. 121, Portion A of Farm Stolzenfeld No. 89, the remaining extent of Altz-Farm Stolzenfeld No. 442, Farm Waldburg No. 82, Portion 1 of Farm Elisenhohe No. 88 and the remaining extent of Farm Elisenhohe No.

- The EAP has noted that WKH is now authorized to act on behalf of these farm owners.

Continued engagement with the MC

- This comment has been noted and all communications between WKH and the EAP will be included in the scoping report appendices depending on the date of receipt, either Appendix B
- Public Consultation Document (for communications dated on or before the 21st of June 2024) or Appendix C – The Addendum Report (for communications dated on or after the 12th of July 2024). This will be shared with WKH and I&APs once the revised final scoping report is submitted to the competent authority - MME and MEFT for a record of decision.

Scoping Report and concerns

- All communications between WKH and the EAP will be submitted to the MC at MME and the EC at MEFT for their review.
- This comment has been noted and the potential impact will be assessed in the socio-economic study as part of the detailed environmental and social impact assessment (ESIA).

88. This development has resulted in the value of the farms increasing significantly, which value will be severely diminished should this project be allowed to continue.

Additional Studies

- We herewith request that the following studies be performed to address our Clients' concerns, and look forward to receipt of all studies done or to be done regarding the project:
 - hydraulic study;
 - geo-hydraulic study;
 - aquatic study;
 - acid drainage study;
 - an environmental impact assessment of the harbour to be used for exportation of the products produced;
 - land use assessment; and
 - geochemical assessment – both static and kinetic

Additional Studies

- This comment has been noted.
- The requested hydraulic and geo-hydraulic studies have been commissioned and the outcomes of those assessments will form part of the ESIA.
- An aquatic study has not been deemed necessary as per the findings of the scoping study. However, should you possess more information as to why this study is vital, please do share that with the EAP.
- A geochemical study will be commissioned of which potential acid drainage impacts will be assessed. The outcomes of that assessment will form part of the ESIA.
- The harbour does not form part of the scope for this Project and therefore, any potential impacts to the harbour due to the exportation of the products produced will not be assessed in this assessment. However, should you possess more information as to why this study is vital, please do share that with the EAP.
- A soil and land use study has been commissioned and the outcomes of that assessment will form part of the ESIA.
- A geochemical assessment will be commissioned that will include static testing. Based on the results of the static testing, further

Graves

There are graves located at the Ou huis Post, corner of M 51 & D 1458

General Concerns

Our clients would like to reiterate the following concerns to be taken into account:

- mass loss of employment;
- damage to the vibrant tourism industry in the area, which is a valuable part of the Namibian economy
- viability and feasibility concerns of an iron ore mine in the areas in question, especially in light of similar activities previously attempted be undertaken in said area.

kinetic testing will be conducted if deemed necessary. The outcomes of the geochemical assessment will form part of the ESIA.

Graves

- A heritage and cultural study has been commissioned and the outcomes of that assessment will form part of the ESIA. The Heritage Impact Assessment Specialist commissioned has been made aware of this comment.

General concerns

- A socio-economic study has been commissioned and the impact of the Project on employment and tourism will be assessed as part of that study and will form part of the ESIA.
- The Proponent is currently undertaking a definitive feasibility study to assess the viability and feasibility of the Project. The outcomes of that assessment will be made available to the public once complete.

4 ACKNOWLEDGEMENTS

Through the ESIA process, the Proponent and ECC have endeavoured to provide a platform to hear and address all relevant comments put forward by I&APs. ECC would like to thank the I&APs and stakeholders for providing feedback during the scoping phase of the ESIA process.

We acknowledge and appreciate the time required to review these documents and ECC genuinely appreciates the input provided by I&APs. ECC acknowledges that constructive feedback results in an improved ESIA and a project that is understood by the community and I&APs.

APPENDIX A – LETTERS RECEIVED FROM I&APS



Matt Totten <mtotten@eccenvironmental.com>

Fwd: JINDAL IRON ORE PROJECT ON EPLS 4013 AND 4194

Jané Louw <louw@wkh-law.com> Fri, May 24, 2024 at 9:15 AM
To: Stephan Bezuidenhout <stephan@eccenvironmental.com>, "mtotten@eccenvironmental.com" <mtotten@eccenvironmental.com>
Cc: "jessica@eccenvironmental.com" <jessica@eccenvironmental.com>, Juzelri Moolman <moolman@wkh-law.com>, "info@eccenvironmental.com" <info@eccenvironmental.com>, Abe Malherbe <malherbe@wkh-law.com>

Good Day,

Trust you are well.

1. Please see attached hereto our letter submitted to the Commissioner of Mines, for your records.
2. Kindly furnish us with a reply to our letter sent on 15 April 2024.

Sincerely,

JANE LOUW

ASSOCIATE

BSC BCOM LLB

T: +264 (0) 61 275 550 | F: +264 (0) 61 238 802

www.wkh-law.com

3rd Floor, WKH House, Ausspannplatz Jan Jonker Road, Windhoek, Namibia_

P.O. Box 864/822 Windhoek



WKH will never send you an email about a change of the WKH banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam

Disclaimer: This communication together with any attachments transmitted with it ("this E-Mail") is intended only for the use of the addressee and may contain information which is privileged and confidential. If the reader of this E-Mail is not the intended recipient or the employee or agent responsible for delivering it to the intended recipient you are hereby notified that any use, dissemination, forwarding, printing or copying of this E-Mail is strictly prohibited. Addressee should check this E-Mail for viruses. WKH Inc. makes no representations as regard the absence of viruses in this E-Mail. If you have received this E-Mail in error please notify the sender immediately. Please then immediately delete, erase or otherwise destroy this E-Mail and any copies thereof. Any opinions expressed in this E-Mail are those of the author and do not necessarily constitute the views of WKH Inc. Nothing in this E-Mail shall bind WKH Inc. in any contract or obligation.

Figure 1 - WKH email sent to ECC on the 24th of May 2024.

**LETTER TO THE MME MINING COMMISSIONER SENT FROM WKH
LEGAL PRACTITIONERS ON 16 JULY 2024:**

WINDHOEK
WKH House
Jan Jonker Road
Aussparplatz
PO Box 864/822
Namibia
Tel: +264 61 275 550

ONGWEDIVA
Shop 27, Oshana Mall
Private Bag 3725
Namibia
Tel: +264 65 220 637
Tel: +264 65 238 054

SWAKOPMUND
Shop 208, Platz Am Meer
PO Box 2970
Namibia
Tel: +264 64 447 100

WALVIS BAY
Office 1, Ground Floor,
Cnr of Theo Ben Guribab
Ave & Johnson Fwafwa
Mabakeng Street
PO Box 4509
Namibia
Tel: +264 64 211 880

GROOTFONTEIN
23B Hidipo Hamutonyia
Street, PO Box 29240,
Namibia
Tel: +264 67 248 700

DIRECTORS
A Swanepool, B.Com LLB
P U Kauta, B.Jur LLB
A A J Naude, B.Jur LLB
E H Visser, B.A LLB
C P J Potgieter, B.Com LLB
F H Kishi, B.Proc
L T van den Berg, BLC LLB
R B Strauss, B.Com LLB
B Greyvenstein, B.Proc
V H Hansoppo-Halkal, LL.B
M D Erkana, LLB
P H K Botha, B.Com LLB
R Greyer, LLB
C M Thero, B.Jur LLB
A J Malherbe, B.A LLB
M U Kuzeeke, LLB, LL.M (Tax)
N van Schaalkwyk, LLB
L Martins, B.A LLB
T Luvindao, B.Jur, LLB, M.Eng
S Wagner, B.A, LLB

ASSOCIATES
S Maritz, B.Jur LLB
D F Malherbe, B.Proc B.A (Hon)
W H Visser, B.A LLB
C Louw van Wijk, B.A LLB
J G van der Merwe, B.A LLB
A I Dos Santos, B.A LLB, LL.M
N Tjebens, B.Jur LLB
P M Hanjjo, B.Jur LLB
E N T Shigwedha, B.Jur LLB
S Venter, LLB
S P Paulus, LLB
C Tuck, LLB
T Martin, B.Soc, LLB
S H Jansen, LLB, LL.M
N Köhnel, B.Com, LLB
J Louw, B.Sc, B.Com LLB
J Moolman, B.A LLB, LL.M
D V Vogel, LLB

CONSULTANTS
S Cowley, B.A SSC (Hon), LLB

**DR WEDER, KAUTA
& HOVEKA INCORPORATED**
Reg. No. 2006/327
VAT No. 4256169-01-5
www.wkh-law.com
Authorised and Regulated by
the Law Society of Namibia



16 July 2024

The Commissioner of Mines
Ministry of Mines
6 Aviation Road
Windhoek
Namibia

Our Ref: JL102979
Reply To: commercial.secretary@wkh-law.com
Enquiries: Ilga van Wyk
Your Ref: EPLs 4013, 4194
ATT: Isabella Chirchir

Dear Madam

RE: EPL 4013 and EPL 4194

- Our letter dated 24 April 2024 bears reference and we confirm that we are still awaiting a formal response thereto.
- We confirm that we continue act on behalf of Mr. R.D. Wirtz ("Client"), who has instructed us to address this letter to you.
- We confirm that we received the Ministry's file contents for EPL 4013, but not for EPL 4194.
- After perusing the file contents, the following facts have become evident.

	Application date	Term (Dates)	Term (years)	Area (ha)
Original application	6 March 2008	19 June 2008 – 18 June 2011	3	30 000
1 st Renewal	13 June 2011	19 June 2011 – 18 June 2013	2	30 000
2 nd Renewal	25 March 2013	19 June 2013 – 18 June 2015	2	30 000
3 rd Renewal	9 May 2015	19 June 2015 – 18 June 2017	2	30 000
4 th Renewal	22 March 2017	19 June 2017 – 18 June 2019	2	29 964.7296

ac

Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payments to WKH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc. will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

5 th Renewal	22 May 2019	26 March 2020 – 25 March 2022	2	21 679.9218
6 th Renewal	28 January 2022	7 November 2022 – 6 November 2024	2	21 679.9218

5. According to the Ministry's file, the expiry date of EPL 4013 is 6 November 2024. However, according to the Ministry's Cadastre Map, it only expires on 25 March 2025.
6. Section 71 of the Minerals (Prospecting and Mining) Act, 1992 ("Act") states the following:
 - (1) *Subject to the provisions of this Act, an exclusive prospecting licence shall be valid*
 - (a) *for such period, not exceeding three years, as may be determined by the Minister at the time of the granting of such licence; and*
 - (b) *for such further periods, not exceeding two years at a time, as may be determined by the Minister at the time of the renewal of such licence as from the date on which such licence would have expired if an application for its renewal had not been made.*
 - (2) *An exclusive prospecting licence shall not be renewed on more than two occasions, unless the Minister deems it desirable in the interests of the development of the mineral resources of Namibia that an exclusive prospecting licence be renewed in any particular case on a third or subsequent occasion.*
7. Thus, in terms of section 71 of the Act, an exclusive prospecting licence may not be granted for a period exceeding 3 years, and thereafter, the exclusive prospecting licence may be renewed only twice for periods not exceeding 2 (two) years at a time, save where the Minister deems it appropriate to renew an exclusive prospecting licence for a third or subsequent time.
8. EPL 4013 was evidently renewed 6 times for periods of 2 years each, and it appears that a 7th renewal took place for a period of 4 months, causing EPL 4013 to expire in March 2025.
9. Furthermore, section 72(1)(b) of the Act states the following:

An application for the renewal of an exclusive prospecting licence shall not be made

- (i) *in the case of a first application for the renewal of such licence, in respect of any land greater in extent than 75 per cent of the prospecting area in respect of which such licence has been issued; or*
- (ii) *in the case of any other application for the renewal of such licence, in respect of any land greater in extent than 50 per cent of the prospecting area existing at the date of such application*




Criminal syndicates may attempt to induce clients to make payments due to WNH Inc. into bank accounts that do not belong to WNH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WNH Inc. Before making any payment to WNH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WNH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WNH Inc. will be made, clients should immediately contact WNH Inc.

WNH Inc. will never send you an email about a change of the WNH Inc. banking details and/or information. This applies to emails and letters received on the company's behalf. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. To help ensure a director of WNH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

without the approval of the Minister, granted in the interest of the development of the mineral resources of Namibia and on good cause shown by the holder of the exclusive prospecting licence in question.

10. Thus, the first renewal of an EPL may only be for 75% of its prospecting area, and any subsequent renewal may only be for 50% of the prospecting area of the previous renewal.
11. EPL 4013 was renewed 3 (three) times for 100% of its prospecting area. Its 4th renewal was for a size of 99.88% of the prospecting area. Its 5th renewal was for a size of 72.35% of the prospecting area. Its 6th renewal was again for 100% of the prospecting area.
12. The renewal of EPL 4013 by the then Mining Commissioner shows a blatant disregard for the law, and the Mining Commissioner acted *ultra vires* in that he acted beyond the scope of his powers and authority by –
 - 12.1. renewing EPL 4013 6 times, where the Act only allows for 2 renewals, and
 - 12.2. renewing EPL 4013 for prospecting area sizes which are contrary to the prescribed sizes contained the Act;

without the requisite and prescribed approval granted by the Minister.

13. In the premises, please provide us with -
 - 13.1. the approval granted by the Minister contemplated in section 71(2) and 72(1)(b) of the Act, and
 - 13.2. the signed and approved minutes of the relevant meetings where such approval was granted,

within 30 days of receipt of this letter, failing which our Client will approach the High Court of Namibia for the setting aside of the granting of all renewals of EPL 4013, as well as launching a formal investigation of corruption into the Ministry of Mines and Energy.

14. Our Client reserves his right pursue any other action available in terms of any other laws, and furthermore reserves his right to institute any action it deems fit in relation to EPL 4194.

Kind regards,



DR. WEDER, KAUTA & HOVEKA INC.
PER: J MOOLMAN



Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payments to WKH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc. will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. Immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

Figure 2 - Letter to the MME Mining Commissioner sent from WKH Legal Practitioners on 16 July 2024.

LETTER TO ECC SENT FROM WKH LEGAL PRACTITIONERS ON 18 JULY 2024:

WINDHOEK
 WKH House
 Jan Jonker Road,
 Ausspannplatz
 PO Box 864/822,
 Namibia
 Tel: +264 61 275 550

ONGWEDIVA
 Shop 27, Oshana Mall
 Private Bag 3725,
 Namibia
 Tel: +264 65 220 637
 Tel: +264 65 238 034

SWAKOPMUND
 Shop 20B, Platz Am Meer
 PO Box 2970,
 Namibia
 Tel: +264 64 443 100

WALVIS BAY
 Office 1, Ground Floor,
 Cnr of Theo Ben Guribab
 Ave & Johnson Fwafwa
 Mabakeng Street
 PO Box 4509,
 Namibia
 Tel: +264 64 211 890

GROOTFONTEIN
 23B Hidipo Hamuteriya
 Street, PO Box 29240,
 Namibia
 Tel: +264 67 248 700

DIRECTORS
 A Swanepoel, B.Com LLB
 P U Kautz, B.Jur LLB
 A A J Naude, B.Jur LLB
 E H Yssel, B.A LLB
 C P J Potgieter, B.Com LLB
 F N Kishi, B.Proc
 L T van den Berg, B.LC LLB
 R B Strauss, B.Com LLB
 B Greyvenstein, B.Proc
 V M Hanongo-Hakali, LLB
 M D Erkana, LLB
 P H K Botha, B.Com LLB
 R Dreyer, LLB
 C M Tjhero, B.Jur LLB
 A J Malherbe, B.A LLB
 M U Kuzeeke, LLB, LLM (Tax)
 N van Schalkwyk, LLB
 L Martins, B.A LLB
 T Luvindso, B.Jur, LLB, M.Eng
 S Wagner, B.A, LLB

ASSOCIATES
 S Maritz, B.Jur LLB
 D F Malherbe, B.Proc B.A (Hon)
 W H Visser, B.A LLB
 C Louw van Wyk, B.A LLB
 J G van der Merwe, B.A LLB
 A I Dos Santos, B.A LLB, LLM
 M Tjebane, B.Jur LLB
 P M Hango, B.Jur LLB
 E N T Shigwedha, B.Jur LLB
 S Venter, LLB
 S P Paulus, LLB
 C Turck, LLB
 T Martin, B.SOC, LLB
 S H Jansen, LLB, LLM
 N Kühnel, B.Com, LLB
 J Louw, B.Sc, B.Com LLB
 J Moodman, B.A, LLB, LLM
 IDV Vogel, LLB

CONSULTANTS
 S Cowley, BB SSC (Hon), LLB

**DR WEDER, KAUTA
 & HOVEKA INCORPORATED**
 Reg. No. 2096/327
 VAT No. 425619-01-5
 www.wkh-law.com
 Authorised and Regulated by
 the Law Society of Namibia



18 July 2024

**ENVIRONMENTAL COMPLIANCE
 CONSULTANCY (PTY) LTD**
 PO BOX 91193
 KLEIN WINDHOEK
 WINDHOEK

Our Ref: MAT102979
 Reply To: commercial.secretary@wkh-law.com
 Enquiries: Ilga van Wyk
 Your Ref: ECC-148-464-LET-07-A

Dear Sir/Madam,

RE: SUBMISSION OF THE FINAL SCOPING REPORT AND PRELIMINARY EMP FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE JINDAL IRON ORE MINE ON EPLS 4194 AND 4013, KHOMAS REGION, NAMIBIA.

1. We refer to the above as well as your email, scoping report, and annexures thereto, dated 12 July 2024.

2. We confirm that we continue to act herein on behalf of Mr. Robert Douglas Wirtz (our "Client").

LETTER TO COMMISSIONER OF MINES

3. We attach hereto our letter submitted to the Commissioner of Mines on the 17th of July 2024.

4. To date, we have not received any reply to letters sent to the Commissioner of Mines, despite following up on a regular basis.

5. Sub-regulations 4(c) and (d) of the Environmental Impact Assessment Regulations GN 30/2012, (the "Regulations") provide that an EAP must –

"(c) comply with the Act, these regulations, guidelines and other applicable laws and

(d) disclose to the proponent, competent authority and the Environmental Commissioner all material information in the possession of the EAP that reasonably has or may have the potential of influencing –

(i) any decision to be taken with respect to the application in terms of the Act and these regulations; or

(ii) the objectivity of any report, plan or document to be prepared by the EAP in terms of the Act and these regulations" (emphasis added).

Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc. will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

6. As such, we look forward to receipt of proof of such disclosure and trust that you will consider these material issues with the appropriate level of urgency.

SCOPING REPORT

7. Sub-regulation 8(a) of the Regulations provides that a scoping report must include *"the curriculum vitae of the EAP who prepared the report"*. We have not been able to locate the curriculum vitae in the scoping report or annexures thereto.
8. Sub-regulation 8(f)(iv) of the Regulations provides that a scoping report must include -
*"details of the public consultation process conducted in terms of regulation 7(1) in connection with the application, including -
(iv) a summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues"* (emphasis added).
9. Neither the scoping report nor the annexures thereto contain the issues raised in our letter dated 15 April 2024 or the email sent to you on the 24th of May 2024.
10. Kindly provide proof that the above requirements have been complied with.

Sincerely,



DR WEDER, KAUTA & HOVEKA INC

PER: JA LOUW



Criminal syndicates may attempt to induce clients to make payments due to WKH Inc, into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc, clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc, will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

Figure 3 - Letter to ECC sent from WKH Legal Practitioners on 18 July 2024.

MC RESPONSE LETTER TO WKH ON THE 22ND OF JULY 2024:



REPUBLIC OF NAMIBIA

MINISTRY OF MINES AND ENERGY

Tel: +264 61 284-8111
Fax: +264 61 284-8366
E-mail: info@mme.gov.na
Website: www.mme.gov.na

1 Aviation Road
Private Bag 13297
WINDHOEK

Enquiries: Mr A Illende
Reference: 14/2/4/1/4013 & 4194

22 July 2024

Ms J Moolman
Weder, Kaufa and Hoveka Inc.
P. O. Box 864
Ausspannplatz
WINDHOEK

Dear Moolman,

RE: EPL 4013 AND EPL 4194

I refer to your letter dated 24 April 2024.

As clearly stated in your letter under paragraph 5 quoting section 71 (1) and (2) in the Minerals (Prospecting and Mining) Act, No. 33 of 1992, the Minister will renew an exploration licence if it is desirable in the interest of the development of the mineral resources in any case on a third or subsequent occasion and no time frame is indicated.

In the case of the two EPLs, there is a mineral resource discovered and more exploration activities need to be conducted to delineate the resource. Due to that discovery, the Minister renewed the two above-mentioned EPLs and the copies of that approvals are attached hereto.

Should you need more clarity about the issue, please do not hesitate to contact us.

Yours Sincerely,



All official correspondence must be addressed to the Executive Director.

Figure 4 - MC response letter to WKH on the 22nd of July 2024.

WKH RESPONSE LETTER TO MC ON THE 30TH OF JULY 2024:

WINDHOEK
WIND House
Jan Jonker Road,
Aussparplatz
PO Box 864/822,
Namibia
Tel: +264 61 275 550

ONGWEDIVA
Shop 27, Oshana Mall
Private Bag 3725,
Namibia
Tel: +264 65 220 637
Tel: +264 65 238 034

SWAKOPMUND
Shop 208, Platz Am Meer
PO Box 2970,
Namibia
Tel: +264 64 443 100

WALVIS BAY
Office 1, Ground Floor,
Chr of Theo Ben Currab
Auk & Johnson Ervavia
Mabakong Street
PO Box 4509,
Namibia
Tel: +264 64 211 880

GROOTFONTEIN
23B Hidipo Hamutenya
Street, PO Box 29240,
Namibia
Tel: +264 67 248 700

DIRECTORS
A Svanepoel, B. Com LLB
P H Keus, B Jur LLB
A A J Hude, B Jur LLB
E H Weder, BA LLB
C P J Morigler, B Com LLB
F N Kahl, B Proc
L Van den Berg, BLC LLB
R B Shaua, B Com LLB
B Greyvenstein, B Proc
V M Hanongo-Hakati, LLB
M D Erkana, LLB
P H K Botha, B Com LLB
R Dreyer, LLB
C M Tshero, B Jur LLB
A J Matherbe, B A LLB
M U Kuzeeke, LLB, LLM (Tax)
N van Schalkwyk, LLB
L Martins, B A LLB
F Luwindas, B Jur, LLB, M Eng
J Wagner, B A LLB

ASSOCIATES
S Maritz, B Jur LLB
D F Matherbe, B Proc B A (Hon)
W H Visser, B A LLB
C Louw van Wilk, BA LLB
J G van der Merwe, BA LLB
A I Dos Santos, B A LLB, LLM
M Tjebets, B Jur LLB
P M Marjols, B Jur LLB
E N T Shigwedha, B Jur LLB
S Venter, LLB
S P Pauk, LLB
C Turck, LLB
T Martin, B Soc, LLB
S H Jansen, LLB, LLM
N Kubnel, B Com LLB
J Louw, B Sc, B Com LLB
J Moodman, B A LLB, LLM
IDV Vogel, LLB

CONSULTANTS
S Cowley, B Sc (Hon), LLB

**DR WEDER, KAUTA
& HOVEKA INCORPORATED**
Reg No: 2006/327
VAT No: 4256169-01-5
www.wkh-ibn.com
Authorised and Regulated by
the Law Society of Namibia



COPY

30 July 2024

The Commissioner of Mines
Ministry of Mines
6 Aviation Road
Windhoek
Namibia

Our Ref: JL/102979
Reply To: commercial.secretary@wkh-ibn.com
Enquiries: Ilga van Wyk
Your Ref: EPLS 4013, 4194
ATT: Isabella Chirchir

Dear Madam

RE: EPL 4013 and EPL 4194

1. Your letter dated 22 July 2024 refers. We thank you for your response.
2. We confirm that we continue act on behalf of Mr. R.D. Wirtz ("Client").
3. In our letter of 16 July 2024, we raise two issues, namely
 - 3.1. That EPL 4013 have been renewed beyond what is allowable ("the Renewals") in terms of the Minerals (Prospecting and Mining) Act, 1992 ("Act") and
 - 3.2. That the size of the prospecting area of EPL 4013 has not been reduced with the renewal thereof in the manner as prescribed by the Act. ("the Non-Reduction of the Prospecting Area")
4. The Renewals and the Non-Reduction of the Prospecting Area can only be justified if the Minister has granted the approvals envisaged by the Act.
5. From our inspection of the Ministry's file on EPL 4013, it appears that the Renewals and Non-Reduction of the Prospecting Area was granted and approved by the Mining Commissioner then in office. In other words, the Renewals and Non-Reduction of the Prospecting Area was done contrary to law because the Mining Commissioner acted *ultra vires* and outside the scope of his authority, because the Minister has not granted the approvals required by the Act.
6. In paragraph 3 of your letter, you state that "...the Minister renewed the two abovementioned EPLs and the copies of that approvals are attached hereto", however, there was no attachments to your letter.

Criminal syndicates may attempt to induce clients to make payments into WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through mail, letters and electronic or other communication channels that may appear to have originated from WKH Inc. Before making any payment to WKH Inc., clients must ensure that the account number to payments will be made is a legitimate bank account at WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc., will be made clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to email and information received via the company letterhead. Any such messaging & change of the banking details like, fraudulent and WKH Inc. team. If you contact a division of WKH Inc. immediately should you receive an email requesting you to effect payment to a financial account details as that is likely false, fraudulent, or an online phishing scam.

7. Following the above, kindly provide us, in respect of **both** the decision to approve the Renewals as well as the decision which lead to the Non-Reduction of the Prospecting Area, with -

7.1. the approval granted by the Minister contemplated in section 71(2) and 72(1)(b) of the Act, and

7.2. the signed and approved minutes of the relevant meetings where such approval was granted,

within 30 days of receipt of this letter, failing which our Client will approach the High Court of Namibia for the setting aside of the granting of all renewals of EPL 4013.

8. Our Client reserves his right pursue any other action available in terms of any other laws, and furthermore reserves his right to institute any action it deems fit in relation to EPL 4194.

Kind regards,



DR. WEDER, KAUTA & HOVEKA INC.
PER: J MOOLMAN



Customer understands and agrees to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc. it is crucial to ensure that the address on a bank payment advice matches a legitimate bank address of WKH Inc. If at any time it does not, clients are not certain of the correctness of the bank account into which a payment due to WKH Inc. will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false. If a customer and they are unsure, kindly contact a director of WKH Inc. immediately through you receive an email requesting you to effect payments to different accounts, do a copy from a likely false, fraudulent, or an online phishing scam.

Figure 5 - WKH response letter to MC on the 30th of July 2024.

5 AUGUST 2024 ECC RESPONSE LETTER TO WKH LEGAL PRACTITIONERS' 18 JULY 2024 LETTER:

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



ECC-148-464-LET-28
5 August 2024

ATT: Mrs. Moolman and Ms. Louw on behalf of Mr. Robert Douglas Wirtz of Farm Koanus
PO Box 864/822
Windhoek
Namibia

Without prejudice

Dear Madams,

RE: SUBMISSION OF THE FINAL SCOPING REPORT AND PRELIMINARY EMP FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE JINDAL IRON ORE MINE ON EPLS 4194 AND 4013, KHOMAS REGION, NAMIBIA.

1. We refer to your above 18 July 2024 letter.
2. We acknowledge you act on behalf of your client, Mr. Robert Douglas Wirtz who is a registered Interested & Affected Party (I&AP) for the proposed Jindal Iron Ore Mine on EPLs 4194 and 4013 within the Khomas Region, Namibia (herein after referred to as "the Project").
3. We confirm receipt of your 17 July 2024 letter to the Mining Commissioner.
4. With regard to sub-regulations 4(c) and (d) of the Environmental Impact Assessment Regulations GN 30/2012, (the "Regulations"), we hereby confirm that we comply with the Act, these regulations, guidelines and other applicable laws, and disclose to the proponent, competent authority and the Environmental Commissioner all material information in our possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application in terms of the Act and these regulations.
5. Kindly specify what information you would like us to provide you with regarding your request for "proof of such disclosure" with reference to point number 4 above.
6. Regarding Sub-regulation 8(a) of the Regulations providing that the scoping report must include "the curriculum vitae (CV) of the EAP who prepared the report", please see the requested EAP CV attached. Also, please note that EAPs are required to submit their CVs to the Ministry of Environment, Forestry and Tourism (MEFT) via the online MEFT portal when uploading the Project final scoping report.

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



Notwithstanding the fact that the CVs are submitted to Government with the submission of the application as mentioned above; we do concede that the draft scoping report issued to the public did not have the EAP CV attached. We are committed to ensuring that the process of the application is followed, and that the intention of meaningful public consultation and engagement is undertaken throughout the impact assessment process. Therefore, we hereby wish to advise that the scoping report will be reissued for a further 7 day public review period to include the EAP curriculum vitae annexure. We thank you for bringing this to our attention.

7. With regard to your claim that there were material issues raised in your 15 April 2024 letter and 24 May 2024 email that should have been included in the Project Public Consultation document, please note the following points:
 - 7.1. Dr. Weder, Kauta & Hoveka Inc. (WKH) has not made a request to register as a Project I&AP; as you are not registered as I&AP, nor did you inform us that your communication to our office was intended to form part of the official record of the impact assessment for the project, your letter and email were not included in the public consultation record, for that reason.
 - 7.1.1. However, in response to your instruction in the above-mentioned letter, we did register your client as an I&AP for the Project.
 - 7.1.2. Should WKH wish to register as an I&AP for the Project, please complete and submit the attached I&AP registration form.
 - 7.1.3. Should WKH register as an I&AP for the Project, and should you request it, we will include your aforementioned letter and email to ECC, and our responses thereof, in the revised scoping report's Public Consultation Register.
 - 7.2. Your 15 April 2024 letter made a list of direct requests from ECC relating to providing you evidence of public consultation, which we responded to in our 24 May 2024 letter and provided all evidence of such requests and details thereof. There has been no acknowledgment of our letter nor further requests or questions, therefore we assume you are satisfied with the information provided.
 - 7.3. For the record we note that we responded to, and willingly engaged with you in response to your requests, as set out below:
 - 7.3.1. Request to register your client as an I&AP, which we did on 15 April 2024.

Environmental Compliance Consultancy (Pty) Ltd
PO Box 91193 Klein Windhoek Namibia
info@eccenvironmental.com
www.eccenvironmental.com
+264 81 669 7608



- 7.3.2. Request to provide proof of compliance with sub-regulation 21(2), which we provided in our 24 May 2024 response letter.
 - 7.3.3. Request for access to the register of I&APs in terms of sub-regulation 22(2), which we provided in our 24 May 2024 response letter.
 - 7.3.4. Your statement regarding sub-regulation 21(3)(b)(i), which we responded to in our 24 May 2024 response letter.
- 7.4. As your 24 May 2024 email only made the following statement and direct request, these items were not included as comments in the Project's Public Comment Register:
- 7.4.1. Notification of sending your 24 April 2024 letter to the Mining Commissioner.
 - 7.4.2. A request to provide you with a response letter to you 15 April 2024 letter, which we did on 24 May 2024.
8. Should you or your client have any further questions or require more information about the proposed Project or ESIA process, please do not hesitate to contact ECC.

Yours sincerely,



Stephan Bezuidenhout
stephan@eccenvironmental.com



Jessica Bezuidenhout Mooney
jessica@eccenvironmental.com

Figure 6 - 5 August 2024 ECC Response Letter to WKH Legal Practitioners' 18 July 2024 Letter.

WKH LETTER SENT TO ECC ON THE 20TH OF AUGUST 2024 VIA EMAIL

WINDHOEK
WKH House
Jan Jonker Road,
Ausspannplatz
PO Box 864/822,
Namibia
Tel: +264 61 275 550

ONGWEDIVA
Shop 27, Oshana Mall
Private Bag 3725,
Namibia
Tel: +264 65 220 637
Tel: +264 65 238 054

SWAKOPMUND
Shop 206, Platz Am Meer
PO Box 2970,
Namibia
Tel: +264 64 443 100

WALVIS BAY
Office 1, Ground Floor,
Cnr of Theo Bon Curirab
Ave & Johnson Fwatwa
Mabakeng Street
PO Box 4509,
Namibia
Tel: +264 64 211 880

GROOTFONTEIN
23B Hidipo Hamuteriya
Street, PO Box 29240,
Namibia
Tel: +264 67 248 700

DIRECTORS
A Swanepoel, B. Com LLB
P U Kauta, B.Jur LLB
A.A.J Naude, B.Jur LLB
E H Yssel, B.A LLB
C P J Potgieter, B.Com LLB
F N Kishi, B.Proc
L T van den Berg, BLC LLB
R B Strauss, B.Com LLB
D Greyvenstein, D.Proc
V M Hanongo-Halkali, LLB
M D Erkana, LLB
P H K Botha, B.Com LLB
R Drayer, LLB
C M Tjibero, B.Jur LLB
A J Malherbe, B.A LLB
M U Kuzeeko, LLB, LLM (Tax)
N van Schalkwyk, LLB
L Martins, B.A LLB
T Luvindao, B.Jur, LLB, M.Eng
S Wagner, B.A, LLB

ASSOCIATES
S Maritz, B.Jur LLB
D F Malherbe, D.Proc B.A (Hon)
W H Visser, B.A LLB
C Louw van Wijk, B.A LLB
J C van der Merwe, B.A LLB
A I Dos Santos, B.A LLB, LLM
M Tjiteere, B.Jur LLB
P M Hange, B.Jur LLB
E N T Shigwedha, B.Jur LLB
S Venter, LLB
S P Paulus LLB
C Turck, LLB
T Martin, B.SOC, LLB
S H Janser, LLB, LLM
N Kühnel, B.Com, LLB
J Louw, B.Sc, B.Com LLB
J Moolman, B.A, LLB, LLM
IDV Vogel, LLB

CONSULTANTS
S Cowley, BB SSC (Hon), LLB

**DR WEDER, KAUTA
& HOVEKA INCORPORATED**
Reg. No. 2006/327
VAT No. 4256769-01-S
www.wkh-law.com
Authorised and Regulated by
the Law Society of Namibia



20 August 2024

**ENVIRONMENTAL COMPLIANCE
CONSULTANCY (PTY) LTD
PO BOX 91193
KLEIN WINDHOEK
WINDHOEK**

Our Ref: MAT102979

Reply To: louw@wkh-law.com

moolman@wkh-law.com

CC: commercial.secretary@wkh-law.com

Enquiries: Jane Louw

Your Ref: ECC-148-464-LET-07-A

Dear Sir/Madam,

**RE: SUBMISSION OF THE FINAL SCOPING REPORT AND PRELIMINARY
EMP FOR THE PROPOSED CONSTRUCTION AND OPERATION OF THE
JINDAL IRON ORE MINE ON EPLS 4194 AND 4013, KHOMAS REGION,
NAMIBIA.**

1. We refer to the above, your letter dated 5 August 2024, as well as your email and scoping report dated 13 August 2024.
2. We confirm that we continue to act herein on behalf of Mr. Robert Douglas Wirtz, the owner of Farm Koanus Number 121, and that we have furthermore been authorised to represent herein Antje Kesselmann of Progress Farming Co (Pty) Ltd, the owner of Farm Progress Number 506; Rainer Halenke, the owner of Farm Hohenau Number 81; Johan Kotze of Marula Game Ranch, the owner of Farm Wolfgrund Number 122, Farm Rainhof Number 123, and Farm Otjimukona Number 532; and Jom, the owner of Farm Grasland Number 80 and Farm Neu Bismark Number 426 (our "Clients").
3. We herewith submit that the contents of this letter are intended to form part of the official record of the impact assessment for the project described above.
4. We attach our I&AP Registration Form hereto as Annexure "A".
CONTINUED ENGAGEMENT WITH THE COMMISSIONER OF MINES
5. We attach hereto our letter submitted to the Commissioner of Mines dated 16 July 2024, their reply dated 22 July, and our further response dated 30 July 2024 as Annexures "B", "C", and "D".
6. Sub-regulations 4(c) and (d) of the Environmental Impact Assessment Regulations, Government Gazette No. 4878 of 2012, GN 30/2012, (the "Regulations") provide that an EAP must –

Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc, clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc, will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

- “(c) comply with the Act, these regulations, guidelines and other applicable laws and*
- (d) disclose to the proponent, competent authority and the Environmental Commissioner all material information in the possession of the EAP that reasonably has or may have the potential of influencing –*
- (i) any decision to be taken with respect to the application in terms of the Act and these regulations; or*
 - (ii) the objectivity of any report, plan or document to be prepared by the EAP in terms of the Act and these regulations” (emphasis added).*

7. As such, we look forward to receipt of proof of disclosure of the contents of this letter, as well as the letters addressed to the Commissioner of Mines, made to the Environmental Commissioner, and trust that you will consider these issues with the appropriate level of urgency.
8. Due to the material irregularities associated with the EPLs, we may institute formal legal action against the Commissioner of Mines. We continue to engage with the Commissioner of Mines on a regular basis in this regard.

SCOPING REPORT AND CONCERNS

9. Sub-regulation 8(f)(iv) of the Regulations provides that a scoping report must include -
- “details of the public consultation process conducted in terms of regulation 7(1) in connection with the application, including -*
- (iv) a summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues” (emphasis added).*
10. Kindly revise the scoping report and the annexures thereto by including the issues raised in our letter dated 15 April 2024, the email sent to you on the 24th of May 2024, and the contents of this letter.

Local Authority Area

11. In terms of Government Gazette No. 8402 of 2024, GN 209/2024, as per section 4(1)(b) of the Local Authorities Act, 1992 (Act No. 23 of 1992), the boundaries of the local authority area of Windhoek have been altered by adding Farm Koanus No. 121, Portion A of Farm Stolzenfeld No. 89, the remaining extent of Altz-Farm Stolzenfeld No. 442, Farm Waldburg No. 82, Portion 1 of Farm Elisenhohe No. 88 and the remaining extent of Farm



Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc., will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

Elisenhohe No. 88. We have attached an extract of the Government Gazette hereto as Annexure "E" for your convenience.

12. This development has resulted in the value of the farms increasing significantly, which value will be severely diminished should this project be allowed to continue.
13. We trust that you will treat this development and the legal consequences which flow therefrom with the appropriate attention.

Additional Studies

14. We herewith request that the following studies be performed to address our Clients' concerns, and look forward to receipt of all studies done or to be done regarding the project:

- 14.1. hydraulic study;
- 14.2. geo-hydraulic study;
- 14.3. aquatic study;
- 14.4. acid drainage study;
- 14.5. an environmental impact assessment of the harbour to be used for exportation of the products produced;
- 14.6. land use assessment; and
- 14.7. geochemical assessment – both static and kinetic.

Graves

15. There are graves located at the Ou huis Post, corner of M 51 & D 1458.

General Concerns

16. Our Clients would like to reiterate the following concerns to be taken into account:
 - 16.1. mass loss of employment;
 - 16.2. damage to the vibrant tourism industry in the area, which is a valuable part of the Namibian economy;



Criminal syndicates may attempt to induce clients to make payments due to WQH Inc. into bank accounts that do not belong to WQH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WQH Inc. Before making any payment to WQH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WQH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WQH Inc., will be made, clients should immediately contact WQH Inc.

WQH Inc. will never send you an email about a change of the WQH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WQH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

16.3. viability and feasibility concerns of an iron ore mine in the area in question, especially in light of similar activities previously attempted to be undertaken in said area.

17. We look forward to receipt of the revised final scoping report.

Sincerely,



DR WEDER, KAUTA & HOVEKA INC

PER: JA LOUW



Criminal syndicates may attempt to induce clients to make payments due to WKH Inc. into bank accounts that do not belong to WKH Inc. This form of fraud may be perpetrated through e-mails, letters and electronic or other correspondence that may appear to have emanated from WKH Inc. Before making any payment to WKH Inc., clients must ensure that the account into which payment will be made is a legitimate bank account of WKH Inc. If at any time clients are not certain of the correctness of the bank account into which a payment due to WKH Inc., will be made, clients should immediately contact WKH Inc.

WKH Inc. will never send you an email about a change of the WKH Inc. banking details and/or information. This applies to emails and letters received on the company letterhead. Any email mentioning a change of the banking details is false, fraudulent and likely a scam. Kindly contact a director of WKH Inc. immediately should you receive an email requiring you to effect payment to different account details as that is likely false, fraudulent, or an online phishing scam.

Figure 7 - WKH Letter sent to ECC on the 20th of August 2024 via email.

I&AP Comments Letter sent to ECC on 5 July 2024:

Concerns for Progress # 506

1. about 30 graves from the previous century
2. complete destruction of environment to operate exclusive hunting safaris
3. loss of natural surroundings to operate guest farm for international tourists
4. drop of water level of entire area
5. large scale water & aquifer contamination
6. large scale air & dust pollution (also for international airport)
7. sharp increase in poaching, trespassing
8. sharp increase in criminal activities
9. loss of our family home for 40 years (40+ family members)
10. loss of farmyard to operate our park & fly business
11. our workers and their families loose their homes (about 20 people)
12. loss of our entire cattle farming operation, running in excellent condition for over 40 years
13. loss of our ability to produce food for Namibia
14. 10 employees loose their permanent work
15. significant noise pollution, spoiling our country environment
16. impact on gravel road M51
17. loss of private airfield for flying
18. current lifestyle estate plans in the pipeline now impossible
19. loss of fencing, infrastructure, buildings, pipelines, water installations
20. loss of cheetah habitat, vulture breeding pairs, red hartebeest birth grounds, game in general
21. what assurance do we have that local Namibians and NOT foreigners / Mauritians / Indians will be employed?
22. In the past, during the initial prospecting phase, Jindal lost the court case due to numerous transgressions. So if that is their track record, how will the rest going to be?
23. blasting process's impact on buildings, the international airport and its effect on tourism as the biggest contributor to GDP
24. concern about the ability to rehabilitate the area at the end of the mining phase

Figure 8 - I&AP Comments Letter sent to ECC on 5 July 2024.