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# **REPORT:**

# SCOPING REPORT WITH IMPACT ASSESSMENT FOR EXPLORATION ACTIVITIES ON EPL 8792, ERONGO REGION, NAMIBIA

PROJECT NUMBER: ECC-79-421-REP-05-D

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DATE: MAY 2023





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#### **TITLE AND APPROVAL PAGE**

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on EPL 8792, Erongo Region, Namibia

Client Company Name: Marenica Ventures (Pty) Ltd

Client Representatives: Mr Murray Hill Ministry Reference: APP - 000059

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<sup>&</sup>lt;sup>1</sup> J.Bezuidenhout is seconded to Elevate for in country company management duties.



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### **EXECUTIVE SUMMARY**

Marenica Ventures (Pty) Ltd (hereafter referred to as "The Proponent") intends to carry out exploration activities on EPL 8792 for nuclear fuels in the Erongo Region. The EPL is located east of Henties Bay in the Erongo Region. The EPL is located along the D1918 between Usakos and Henties Bay in the =/=Gaingu Conservancy.

The proposed Project triggers listed activities in terms of the Environmental Management Act, No. 7 of 2007 and its regulations, No. 30 of 2012. Therefore, an environmental clearance certificate is required. As part of the environmental clearance certificate application, a Scoping report with Environmental Impact Assessment EIA has been undertaken to meet the requirements of the Environmental Management Act, No.7 of 2007. This Scoping report with assessment and the preliminary Environmental Management Plan (EMP) will be submitted to the competent authority as part of the application process for the environmental clearance certificate. The proposed activities within EPL 8792 include low-impact exploration such as geochemical surveys, geophysical surveys and drilling. If new tracks are required, they will be developed by hand or 4x4 vehicles, terrain-dependent.

The exploration activities will commence when the environmental clearance certificate is granted, and expected to continue for at least 3 years. A renewal application maybe required to extend the activities for the duration of the exploration licence.

The geology over which the EPL falls mainly consists of the Swakop group (Damara supergroup and Gariep complex). The main rock type is metamorphic sedimentary rocks such as schists and dolomites. The EPL is mainly covered with petric Gypsisols. Pedtric meaning soils with a solid layer at a shallow depth that remains hard even when wet and Gypsisols meaning soils with an accumulation of calcium sulphates which is often restricted to areas that are very dry, such as in the central Namibia.

The groundwater vulnerability in this area is considered to be very low vulnerability and groundwater recharge within this area is considered to be very low. Groundwater in this area is generally of poor quality not suitable for human consumption. The dominant vegetation structure for the EPL is Namib grassland, the vegetation type is Central desert and the EPL falls within desert biome the dominated by lichens and Psilicoulon salicornioides.

The following table summarises the outcomes of the impact assessment of the key aspects and the potentially significant impacts that could arise from the exploration activities. The significance rating is provided after the mitigations have been considered.



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Aspect	Potential impact	Significance with mitigation
	Hydrocarbon leaks and spills could enter	Low (2)
Water (surface - and	the aquifer causing contamination	
groundwater);	Waste items and litter can pollute	Low (1)
	drainage channels	
	Pollution of soil from hydrocarbons	Low (1)
	Increased exposure due to possible	Low (1)
Soil	vegetation clearance can cause soil	
3011	erosion	
	Loss of soil quality due to the mixing of	Low (1)
	earth matter, trampling and compaction	
Terrestrial ecology and	Resident, slow-moving and nesting	Low (1)
biodiversity	organisms may be disturbed by excessive	
	noise or vibration	
	Loss/alteration of terrestrial habitats and	Low (1)
	loss of species	
	Residing and nesting organisms such as	Low (1)
	reptiles can be disturbed, injured or killed.	
	Conflict with farm owners about access,	Low (1)
	leaving gates open, suspicious	
Socio-economics	movements, loss of farming area, etc.	
(employment, demography,	Presence of exploration team could be	Low (1)
land-use)	blamed for stock theft and poaching.	
land-use)	Promotes job creation, skills	Low
	development, and opportunities for the	(Beneficial)
	local economy.	
	Visual disturbance and loss of Sense of	Minor (4)
	Place.	
Noise & vibrations	Perceived noise impact from surveying	Low (1)
	activities on wild animals, livestock and	
	humans due to low flying airplanes	
Heritage (culture, history, Potential damage to cultural heritage		Minor (4)
archaeology, palaeontology)		

Impacts with respect to airborne dust are expected to be limited to vehicular traffic and drilling activities. There will be some release of exhaust fumes from machinery that will impact the immediate vicinity but this will be of short duration. Noise impacts include those associated with drilling and other machine noise, which could be a disturbance to immediate neighbours, but this will be short in duration as well. The analysis of the impacts and the identification of mitigation and management methods, concludes that the likely significance of effects on humans from the cumulative impacts of physical disturbance, noise, dust and emissions is expected to be minor with a temporary qualitative reduction in the sense of place.



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It was determined that the impacts from noise are considered to be of minor significance. However with additional mitigation, the significance can be reduced to low. A major mitigation measure for the exploration activities will be that all activities will be undertaken during daylight hours.

Continual engagement with the committee of the Conservancy must be undertaken by the Proponent to identify any concerns or issues, and additional appropriate mitigation and management measures must be agreed upon and implemented.

The overall potential impact of this proposed Project is not considered significant as it does not exceed recognised levels of acceptable change, nor will it threaten the integrity of the receptors. The assessment is considered to be comprehensive and sufficiently identifies the potential impacts, and it is concluded that no further assessment will be required. The preliminary EMP provides the necessary mitigations and management measures required to reduce potential impacts to acceptable levels.





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### **TERMS AND ABBREVIATIONS**

ABBREVIATIONS	DESCRIPTION	
Abundant	Indicates a high occurrence or abundance	
AIDS	Acquired immunodeficiency syndrome	
AMT	Audio MagnetoTelluric	
ASX	Australian Securities Exchange	
BID	Background Information Document	
CIA	Cumulative Impact Assessment	
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	
Common	Indicates a high occurrence or abundance	
DEA/MEFT	Directorate of Environmental Affairs and Ministry of Environment Forestry and Tourism	
E	East	
EC	Environmental Commissioner	
ECC	Environmental Compliance Consultancy	
EIA	Environmental Impact Assessment	
EM	Electromagnetic	
EMA	Environmental Management Act, No.7 of 2007	
EMP	environmental management plan	
endemic	Species that are native and restricted to a particular geographic region	
ENE	east - northeast	
EPL	Exclusive Prospecting Licence	
ESE	east - southeast	
ESIA	Environmental and Social Impact Assessment	
GDP	Gross Domestic Produce	
GG	Government Gazette	
GIS	Geographic Information System	
HIV	human immunodeficiency virus	
I&APs	Interested and Affected Parties	
IFC	International Finance Corporation	
IUCN	International Union for Conservation of Nature	
Km/h	Kilometres per hour is a measurement of speed, expressing the number of kilometres that can be travelled in one hour.	
Km <sup>2</sup>	A square kilometre (sometimes written km²) is based on the SI unit of measurement of area, the square meter. It is the area inside a square that has each side equal to 1 kilometre (1000 meters)	
low	A low level of diversity of abundance	
m	Abbreviation for meter, used to indicate height or length in metric meters	
MAWLR	Ministry of Agriculture, Water and Land Reform	
MEFT	Ministry of Environment, Forestry and Tourism	
MHSS	Ministry of Health and Social Services	



ABBREVIATIONS	DESCRIPTION	
mm	Millimetre	
MME	Ministry of Mines and Energy	
moderate	Indicates a moderate level of diversity or abundance	
NDP	National Development Plan	
NPC	National Planning Commission	
NSA	National Statistics Agency	
Occasional	Indicates sporadic occurrence or abundance	
Quadrant	A quarter degree of latitude and longtitude, used for mapping and	
	surveying purposes	
RAB	Rotary Air Blast	
rare	Indicates a low occurrence or abundance	
RC	Reverse Circulation	
RH	Relative Humidity	
spp	Abbreviation for species, used to refer to multiple species within a	
	genus or group	
SW	southwest	
SSW	south -southwest	
ТВ	tuberculosis	
U-pgrade™	Uranium concentration process developed by Elevate Uranium	
Uncommon	Indicates a relatively low occurrence or abundance	
var	Abbreviation indicates variety, used in botanical nomenclature to	
	indicate a subspecies or variety of a plant species	
veld	Refers to open grasslands or savannahs in Southern Africa	
WHO	World Health Organisation	



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### 1 INTRODUCTION

### 1.1 COMPANY BACKGROUND

Environmental Compliance Consultancy (ECC) has been retained by Elevate Uranium (Pty) Ltd (hereafter referred to as "The Proponent") to conduct an environmental and social impact assessment (ESIA) for the exploration of rare and base, precious metal and industrial minerals in terms of the Environmental Management Act No. 7 of 2007 and its regulations of 2012. An environmental clearance certificate application will be submitted to the competent authority and the Ministry of Environment, Forestry and Tourism (MEFT) for a record of decision.

Elevate Uranium Limited is an Australian Securities Exchange (ASX) Listed company. Elevate Uranium developed a uranium concentration process (U- $pgrade^{TM}$ ) that is unique and ground-breaking, lowering the extraction cost of uranium and significantly reducing potential environmental effects associated with the reduced mass of ore to be leached. This U- $pgrade^{TM}$  process can be applied to surficial uranium deposits of which Elevate Uranium is exploring. Elevate Uranium is seeking to explore further uranium mining opportunities as the company undertakes exploration activities for Nuclear Fuel Minerals in the Erongo Region.

Marenica Ventures (Pty) Ltd (Marenica Ventures) is a wholly owned subsidiary of Elevate Uranium Limited (Elevate Uranium). Marenica Ventures holds Exclusive Prospecting Licence for the proposed 'Marenica West' project (referred to as "the Project" herein). The project is located within exclusive prospecting licence EPL 8792 and the proponent proposes to undertake mineral exploration activities specifically for nuclear fuels. The EPL is located about 40km east of Henties Bay in the =/=Gaingu Conservancy in the Erongo Region. The EPL can be accessed via the D1918 between Usakos and Henties Bay in the.

The proposed Project area is shown in Figure 1.



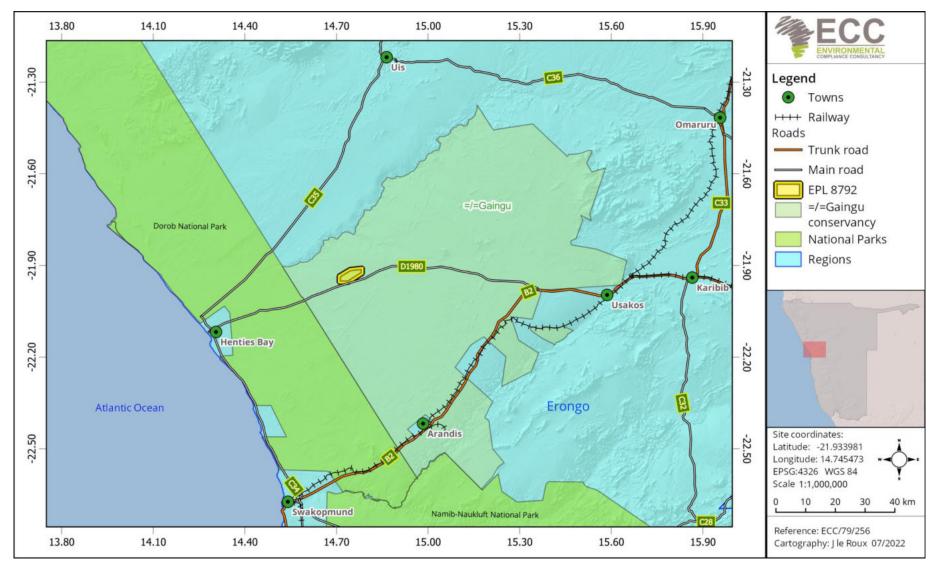


Figure 1 - Locality map of EPL 8792, Erongo Region



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### 1.2 Purpose of the scoping report

An environmental and social impact assessment (ESIA) has commenced in terms of the requirements of the Environmental Management Act, No.7 of 2007 (EMA 2007) and its regulations. The purpose of this report is to present the findings of the scoping study phase that forms part of the larger ESIA process.

The scoping report summarises the prescribed ESIA process followed; provides information on the baseline biophysical and socioeconomic environments; project description details; outlines the terms of reference for the assessment phase and prepares a preliminary environmental management plan (EMP).

ECC's terms of reference for the assessment are strictly to address potential impacts, whether positive or negative and their relative significance, explore alternatives for technical recommendations and identify appropriate mitigation measures.

This report provides information to the public and stakeholders to aid in the decision-making process for the proposed Project. The objectives are to:

- Describe the proposed activity and the site on which the activity is to be undertaken, and the location of the activity on the site;
- Describe the environment that may be affected by the activity;
- Identify the laws and guidelines that have been considered in the assessment and preparation of this report;
- Provide details of the public consultation process;
- Describe the need and desirability of the activity;
- Provide a high-level environmental and social impact assessment on feasible alternatives that were considered; and
- Report the assessment findings, identifying the significance of effects, including cumulative effects, and effective and feasible mitigation measures.

In addition to the environmental assessment, a preliminary EMP (Appendix A) is also required in terms of the Environmental Management Act, No. 7 of 2007. A preliminary EMP (herein referred to as EMP) has been developed to provide a management framework for the planning and implementation of exploration activities. The EMP provides exploration standards and arrangements to ensure that the potential environmental and social impacts are mitigated, prevented and/or minimised as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled.

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### 1.3 Proponent details

Table 1 - Proponent's details

Contact Person	Contact Details
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(CEO)	P O Box 90242
	Klein Windhoek
	Windhoek, Namibia

### 1.4 Environmental Compliance Consultancy

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. All compliance and regulatory requirements regarding this ESIA report should be forwarded by email or posted to the following address<sup>2</sup>:

Environmental Compliance Consultancy PO BOX 91193 Klein Windhoek, Namibia

Tel: +264 81 669 7608

Email: info@eccenvironmental.com

 $<sup>^{\</sup>rm 2}$  J.Bezuidenhout is seconded to Elevate for in country company management duties.



# 1.5 Environmental legal requirements

The Environmental Management Act, No.7 of 2007 stipulates that an environmental clearance certificate is required to undertake listed activities in terms of the Act and its regulations. Listed activities triggered by the Project in terms of the Environmental Management Act, No. 7 of 2007 and its regulations are listed in Table 2:

Table 2 - Listed activities triggered by the project.

LISTED ACTIVITY	AS DEFINED BY THE ACT	RELEVANCE TO THE PROJECT
Mining and quarrying	(3.1) The construction of facilities for any process or activities	- Minerals (soil and sand), and nuclear fuel minerals will be
activities	that require a license, right, or other forms of authorization,	sourced within the project's footprint.
	and the renewal of a license, right, or other forms of	- The proponent will also undertake geochemical surveys,
	authorization, in terms of the Minerals (Prospecting and	geophysical surveys, and RC drilling
	Mining Act), 1992.	
	(3.2) Other forms of mining or extraction of any natural	
	resources whether regulated by law or not.	
	(3.3) Resource extraction, manipulation, conservation, and	
	related activities.	
Waste management,	(2.1) The construction of facilities for waste sites, treatment of	- Waste generated which will mainly consist of solid waste
treatment, handling	waste and disposal of waste.	and general waste during the exploration phase will be
and disposal activities	'	removed by a skip and disposed of at the nearest landfill
	(2.3) The import, processing, use and recycling, temporary	site. Waste will be recycled, to the extent possible.
	storage, transit or export of waste.	- A portable toilet, a long drop hole for a toilet or chemical
		toilets will be used during exploration activities by the
		drill crew.

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COMPLIANCE COMPLIANCY		Marchica ventures (1 ty) Eta
LISTED ACTIVITY	AS DEFINED BY THE ACT	RELEVANCE TO THE PROJECT
Forestry activities	(4.) The clearance of forest areas, deforestation, afforestation,	- Limited vegetation clearing may be required for tracks
	timber harvesting or any other related activity that requires	and survey access creation, and possibly for the set-up of
	authorisation in terms of the Forest Act, 2001 (Act No. 12 of	survey and drilling teams' field camps. Felling of large
	2001) or any other law.	trees will be avoided. Any clearing of vegetation will
		require a permit from the Ministry of Environment,
		Forestry and Tourism (MEFT)
Water resource	(8.1) The abstraction of ground or surface water for industrial	- For the drilling of exploration boreholes, ground water
developments	or commercial purposes.	may need to be abstracted, or water will be sourced.
Hazardous substance	(9.2) Any process or activity that requires a permit, license, or	- Portable toilets, long drop holes for toilets, or chemical
treatment, handling	another form of authorisation, or the modification of or	toilets will be used during the exploration activities.
and storage	changes to existing facilities for any process or activity which	
	requires amendment of an existing permit, license or	
	authorisation or that requires a new permit, license or	
	authorisation in terms of a governing the generation or	
	release of emissions, pollution, effluent or waste.	
	I	

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# **2 APPROACH TO THE ASSESSMENT**

#### 2.1 PURPOSE AND SCOPE OF THE ASSESSMENT

This assessment aims to determine which impacts are likely to be significant; to scope the available data and identify any gaps that need to be filled; to determine the spatial and temporal scope and to identify the assessment methodology.

The scope of the assessment was determined by undertaking a preliminary assessment of the proposed Project against the receiving environment, obtained through a desktop review and available site-specific literature.

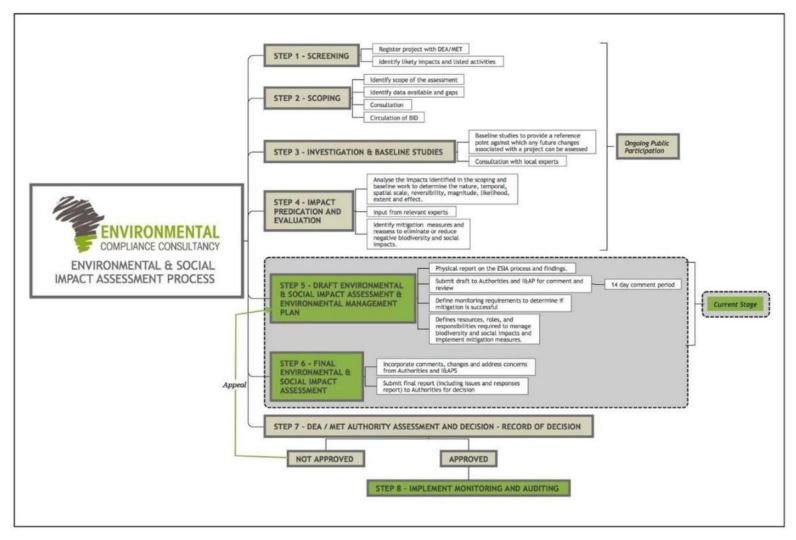
### 2.2 THE ASSESSMENT PROCESS

The ESIA methodology applied to this assessment has been developed using the International Finance Corporation (IFC) standards and models, in particular, Performance Standard 1, 'Assessment and management of environmental and social risks and impacts' (International Finance Corporation, 2017) (International Finance Corporation, 2012), which establishes the importance of:

- Integrated assessment to identify the environmental and social impacts, risks, and opportunities of Projects;
- Effective community engagement through disclosure of Project -related information and consultation with local communities on matters that directly affect them and
- The client's management of environmental and social performance throughout the life of the Project

Furthermore, the Namibian Draft Procedures and Guidance for ESIA and EMP (Republic of Namibia, 2008) as well as the international and national best practice; and over 25 years of combined EIA experience, were also drawn upon in the assessment process. This impact assessment is a formal process in which the potential effects of the Project on the biophysical, social, and economic environments are identified, assessed, and reported so that the significance of potential impacts can be considered when considering whether to grant approval, consent or support for the proposed Project.





**Figure 2 - ESIA Process** 

MAY 2023



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### 2.3 SCREENING OF THE PROJECT

The first stages in the ESIA process are to register the Project with the DEA/ MEFT (completed) and undertake a screening exercise to determine whether it is considered a listed activity under the Environmental Management Act, No. 7 of 2007 and associated regulations and if significant impacts may arise from the Project. The location, scale, and duration of Project activities will be considered against the receiving environment.

The proposed Project is a listed activity and potential impacts could occur. Thus, it was concluded that a scoping report with impact assessment would suffice for the exploration project and that a preliminary EMP would be submitted with scoping report.

### 2.4 SCOPING AND THE ENVIRONMENTAL ASSESSMENT

Where detailed assessment is required, the second stage is to scope the assessment. The main aims of this stage are to determine which impacts are likely to be significant; scope the available data and any gaps which need to be filled; determine the spatial and temporal scope and identify the assessment methodology.

The scoping phase of the Project is a preliminary analysis to determine ways in which the Project interacts with the biophysical, social, and economic environment. Potential impacts are identified, and the significance is assessed during the screening and scoping phase. The details and outcome of the impact assessment are discussed in sections 6 and 7 of this Report. Feedback from consultation with the proponent and stakeholders also informs the analysis of the impacts. The following environmental and social aspects were considered in impact assessment process:

#### SOCIO-ECONOMIC ENVIRONMENT

- Procurement of goods and services within the local economy.

#### **BIOPHYSICAL ENVIRONMENT**

- Dust emissions
- Soil and geology
- Terrestrial ecology
- Terrestrial biodiversity (including fauna and flora)

### 2.5 BASELINE STUDIES

Baseline studies are undertaken as part of the scoping stage, which involves collecting all pertinent information from the current status of the receiving environment. This provides a baseline against which changes that occur because of the proposed Project can be measured. For the proposed Project, baseline information was obtained through a desktop study, consultation, and engagement with stakeholders (Appendix B), focusing on environmental receptors that could be



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affected by the proposed Project, and verified through site-specific information. The baseline information is covered in Chapter 5.

### 2.6 Public consultation

Public participation and consultation are a requirement as stipulated in the Environmental Impact Assessment Regulations (Regulations 21 and 23) of the EMA, No.7 of 2007, for a project undertaking a listed activity that requires an environmental clearance certificate. Consultation is a compulsory and critical component of the ESIA process for achieving transparent decision-making and can provide many benefits. Consultation is ongoing during the ESIA process. The objectives of the public participation and consultation process are to:

- Provide information on the Project, introducing the overall project concept and planning in the form of a background information document (BID)
- Determine the relevant government, regional and local regulating authorities
- Listen to and understand community issues, record concerns and guestions
- the ESIA and the timeframes involved and establish a platform for ongoing consultation

# 2.6.1 IDENTIFICATION OF KEY STAKEHOLDERS AND INTERESTED AND AFFECTED PARTIES

A stakeholder mapping exercise was undertaken to identify individuals or groups of stakeholders, and the method in which they will be engaged during the ESIA process.

Stakeholders were approached through direct communication (letters and phone calls), the national press, or directly by email. A summarised list of stakeholders for this project is given below:

- The general public with an interest in the Project
- Ministry of Environment, Forestry and Tourism (MEFT)
- Ministry of Mines and Energy (MME)
- Erongo Regional Council
- Henties Bay Town Council and
- =/=Gaingu Conservancy

The records of the public consultation process in the form of a summary report will provide a list of interested and affected parties (I&AP's), evidence of consultation, including minutes of any meetings, advertisements in national newspapers, and a summary of the comments or questions raised by the public.

#### 2.6.2 NON-TECHNICAL SUMMARY

The Background Information Document (BID) presents a high-level description of the proposed Project; sets out the ESIA process and outlines when and how consultation will be undertaken. It



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also provides contact details for further Project -specific inquiries to all registered I&APs. The BID was distributed to registered I&APs and can be found in Appendix B.

#### 2.6.3 NEWSPAPERS AND ADVERTISMENTS

Notices regarding the proposed Project and associated activities were circulated in three newspapers namely the 'Republikein, Sun, and Allgemeine Zeitung' on the 17<sup>th</sup> of October and 24<sup>th</sup> of October 2022 (see Appendix C). The purpose of this was to commence the consultation process by informing the public about the Project and enabling I&APs to register and submit any concerns or comments about the Project.

#### 2.6.4 SITE NOTICES

A site notice ensures neighbouring properties and stakeholders are made aware of the proposed Project. The site notice was set up at the boundary of the EPL as illustrated in Appendix C.

#### 2.6.5 PUBLIC MEETING

In terms of Section 22 of the Environmental Management Act, No. 7 of 2007 and its regulations, for the purpose of registering I&APs. A public meeting is not a requirement during the public consultation process for all projects. The EAP decided not to call for a public meeting but rather engage directly with stakeholders and consider the written comments and concerns submitted through the registration of interested and affected parties.

#### 2.6.6 SUMMARY OF ISSUES RAISED

The I&APs were encouraged to provide constructive input during the consultation periods. Matters of concern raised during the initial round of consultation are presented in Appendix C.

The public was further provided with an opportunity to send any comments on the draft scoping report with impact assessment and the EMP. These will be included and addressed, where applicable, in the final scoping report with impact assessment and the EMP.

### 2.7 Draft scoping report with impact assessment and preliminary EMP

The draft scoping report with impact assessment and preliminary EMP will be submitted to the public for review prior to submission to the competent authority and DEA. This report documented the findings of the assessment process, provides stakeholders with the opportunity to comment and continue to engage in consultation and forms part of the environmental clearance application.

The preliminary EMP provides measures to manage the potential environmental and social impacts of the proposed Project and outlines specific roles and responsibilities to fulfil the plan. The draft documents will be updated with the additional comments that stem from the public review of the reports.



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### 2.8 Final scoping report with impact assessment and preliminary EMP

The final scoping report with impact assessment, associated appendices will be available to all stakeholders on the ECC website <a href="https://eccenvironmental.com/download/the-proposed-exploration-of-nuclear-fuels-on-epl-8728-8792-and-8795-erongo-region-namibia/">https://eia.met.gov.na/</a>. All I&APs will be informed of this via email.

These same final documents are formally submitted to the competent authority, namely, the Ministry of Mines & Energy. A copy of the submission proof and the same set of the documents are submitted to the Office of the Environmental Commissioner, DEA department, as part of the application for an environmental clearance certificate.

### 2.9 AUTHORITY ASSESSMENT AND DECISION MAKING

The Environmental Commissioner in consultation with the MME and other relevant authorities will assess the findings of the Final Scoping with Impact Assessment. If deemed acceptable, the Environmental Commissioner will revert to the Proponent with a record of decision and any recommendations. If the clearance is not granted, then reasons are normally provided. For example, it may be required for the Proponent to undertake a detailed assessment. A detailed assessment would most likely entail the commissioning of specialist studies with impact assessments.

#### 2.10 Monitoring and auditing

In addition to the EMP being implemented by the Proponent, a monitoring strategy and audit procedure will be determined by the Proponent and competent authority (i.e., MME). This will ensure that key environmental receptors are monitored over time to establish any significant changes from the baseline environmental conditions caused by Project activities.



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### 3 REVIEW OF THE LEGAL ENVIRONMENT

As stated in Section 1, an environmental clearance certificate is required for any activity listed in the Government Notice No. 29 of 2012 of the EMA 2007. The Project area is located within a registered conservancy area but outside the Dorob National Park and any recognised heritage area (e.g. Spitzekoppe Massifs).

A thorough review of relevant legislation has been conducted for the proposed Project. Table 3 below identifies relevant legal requirements specific to the Project. Table 4 provides the national policies and plan.



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**Table 5** specifies permits relevant for the Project. This chapter outlines the regulatory framework applicable to the proposed Project.



# 3.1 NATIONAL REGULATORY FRAMEWORK

Table 3 - Details of the regulatory framework as it applied to the proposed Project.

National Regulatory	Summary	Applicability to the Project
Regime		
Constitution of the Republic	The constitution defines the country's position in	The Proponent is committed to the sustainable use of the
of Namibia (1990)	relation to sustainable development and environmental	environment, and has aligned its corporate mission, vision,
	management.	and objectives within the ambit of the Constitution of the
	The constitution refers that the State shall actively	Republic of Namibia (1990).
	promote and maintain the welfare of the people by	
	adopting policies aimed at the following:	
	"Maintenance of ecosystems, essential ecological	
	processes and biological diversity of Namibia, and the	
	utilisation of living, natural resources on a sustainable	
	basis for the benefit of all Namibians, both present, and	
	future."	
Minerals (Prospecting and	The Act provides for the granting of various licences	Exclusive Prospecting Licence EPL 8792 was issued to the
Mining) Act No. 33 of 1992	related to mining and exploration.	Proponent in June 2022 and is valid for a period of 3 years.
	Section 50 (i) requires: "An environmental impact	The proposed prospecting activity on EPL 8792 requires an
	assessment indicating the extent of any pollution of the	EIA to be carried out, as it triggers listed activities as defined
	environment before any prospecting operations or	in Government notice 29 in the Environmental
	mining operations are being carried out, and an	Management Act 2007.
	estimate of any pollution, if any, likely to be caused by	D
	such prospecting operations or mining operations."	Prospecting activities in EPL 8792 shall not commence until
	The Astronomy the second secon	an Environmental Clearance Certificate has been issued in
	The Act sets out the requirements associated with	accordance with the provisions of the Environmental
	licence terms and conditions, such that the holder of a	Management Act 2007.
	mineral licence shall comply with.	The Drainet shall be compliant with Costian 76 of the
		The Project shall be compliant with Section 76 of the
		Minerals Act with regard to records, maps, plans and

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National Regulatory	Summary	Applicability to the Project
Regime		
	The Act also contains relevant provisions for pollution control related to mining activities and land access agreements and provides provisions that mineral licence holders are liable for any damage to land, water, plant, or animal life, caused by spilling or pollution, and must take all such steps as may be necessary to remedy such spilling, pollution, loss, or damage, at its own costs.	financial statements, information, reports and returns submitted.
Environmental Management Act, 2007 (Act No. 7 of 2007) and its regulations (2012), including the Environmental	The Act aims to promote sustainable management of the environment and the use of natural resources. The Act requires certain activities to obtain an environmental clearance certificate prior to Project development.	This scoping report documents the findings of the scoping phase and includes an environmental and social impact assessment sufficient for the project's activities.
Impact Assessment Regulation, 2007 (No. 30 of 2011)	The Act states that an EIA should be undertaken and submitted as part of the environmental clearance certificate application process.	The process has been undertaken in line with the requirements of the Environmental Management Act and its regulations.
	The MEFT is responsible for the protection and management of Namibia's natural environment. The Department of Environmental Affairs, under the MEFT, is responsible for the administration of the EIA process.	Prospecting activities on EPL 8792 will not commence until an Environmental Clearance Certificate has been issued in accordance with the provisions of the Environmental Management Act 2007.
Hazardous Substances Ordinance, No. 14 of 1974	This Ordinance provides for the control of toxic substances and can be applied in conjunction with the Atmospheric Pollution Prevention Ordinance, No. 11 of 1976. This applies to the manufacture, sale, use, disposal, and dumping of hazardous substances, as well as their import and export.	The Proponent must handle and store hazardous substances such as fuels, reagents, and industrial chemicals in a safe and responsible way, thereby avoiding any harm to the environment.
Labour Act, No. 11 of 2007	The Labour Act, No. 11 of 2007 (Regulations relating to the Occupational Health & Safety provisions of Employees at Work, promulgated in terms of Section 101	The Proponent must adhere to all labour provisions and guidelines, as enshrined in the Labour Act. The Project shall also develop and implement a comprehensive occupational



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National Regulatory	Summary	Applicability to the Project
Regime		
	of the Labour Act, No. 6 of 1992 - GN156, GG 1617 of 1	health and safety plan to ensure adequate protection for its
	August 1997)	personnel throughout the Project lifecycle.
Petroleum Products and	Provides provision for the Minister to regulate the	The Proponent must take into consideration the
Energy Amendment Act, No.3	cleaning up of petroleum product spills, leaks and	requirements that are stipulated in both the Act and its
of 2000	related incidents. The Proponent is required to carry all	Regulations. Measures in the EMP sets out methods to
	costs associated with such incidents.	comply with the Regulations, specifically waste disposal
		during exploration.
Atomic Energy and Radiation	Annual reporting on the implementation of the	The Proponent must take into consideration the
Protection Act, Act 5 of 2005.	Radiation Management Plan to ensure radiation safety	requirements that are stipulated in both the Act and its
	and protection on site	Regulations. Measures in the EMP sets out methods to
		comply with the Regulations, specifically waste disposal
		during exploration.
Radiation Protection & Waste	This Regulations makes provision for proponents to	The Proponent must take into consideration the
Disposal Regulations (No 221	prepare and implement a Radiation Management Plan,	requirements that are stipulated in both the Act and its
of 2011)	commensurate with the activities of operations.	Regulations, the Radiation Protection and Waste Disposal
		Regulations. Measures in the EMP sets out methods to
		comply with the Regulations, specifically waste disposal
		during exploration.

# 3.2 NATIONAL POLICIES AND PLANS

# Table 4 - National policies and plans applicable to the proposed Project

Policy or plan	Description	Relevance to the Project
Vision 2030	Vision 2030 sets out the nation's development targets	The Proponent is encouraged to meet the objectives of
	and strategies to achieve its national objectives.	Vision 2030 and shall contribute to the overall development
		of the country through continued employment
		opportunities and ongoing contributions to the gross
		domestic product (GDP).



Policy or plan Description		Polovopos to the Project	
Policy or plan	Description	Relevance to the Project	
	Vision 2030 states that the overall goal is to improve the		
	quality of life of the Namibian people aligned with the		
	developed world.		
Fifth National Development	The NDP5 is the fifth in a series of seven five-year	The Proponent is encouraged to support Government's	
Plan (NDP5)	national development plans that outline the objectives	objectives of the NDP5 through creating opportunities for	
	and aspirations of Namibia's long-term vision.	continued employment.	
	The NDP5 pillars are economic progression, social		
	transformation, environmental sustainability, and good		
	governance.		
The Harambee Prosperity	Second Pillar: Economic advancement – ensuring	The Proponent will contribute to the continued	
Plan II (2021 – 2025)	increasing productivity of priority key sectors (including	advancement of the mining industry and create an	
	mining) and the development of additional engines of	additional employment generation engine within the	
	growth, such as new employment opportunities.	regional and national landscape.	
Namibia's Green Plan, 1992	Namibian has developed a 12-point plan for integrated	The Proponent is encouraged to adhere to best practise	
	sustainable environmental management to ensure a	during operational activities.	
	safe and healthy environment and to maintain a viable		
	economy. Clause 2 (f) makes specific mention to		
	guidelines related to Mining and Sustainable		
	Development.		
Minerals Policy	The Minerals Policy was adopted in 2002 and sets	The Proponent must conform to the Policy and where	
	guiding principles and direction for the development of	applicable support local spending and procurement.	
	the Namibian mining sector, while communicating the		
	values of the Namibian people.	The Proponent must comply with the general guidelines of	
	The policy strives to create an enabling environment for	the Policy through the adoption of various legal	
	local and foreign investments in the mining sector and	mechanisms to manage all aspects of the environment	
	seeks to maximise the benefits for the Namibian people	effectively and sustainably from the start. The ESIA is one	
	from the mining sector, while encouraging local	such mechanism to ensure environmental integrity	
	participation.	throughout the planned Project's lifecycle.	



Policy or plan	Description	Relevance to the Project
	The objectives of the Minerals Policy are in line with the	
	objectives of the Fifth National Development Plan that	
	include reduction of poverty, employment creation, and	
	economic empowerment in Namibia.	

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# Table 5 - Specific permits and licence requirements for the proposed Project

Permit or licence	Act or Regulation	Related activities requiring a permit	Relevant Authority
Environmental clearance	Environmental	Required for all listed activities shown in Table 2.	Ministry of Environment, Forestry and
certificate	Management Act, No 7 of	Requires issuance of Environmental Clearance	Tourism (MEFT)
	2007	Certificate by the Environmental Commissioner.	
Exclusive Prospecting	Section 90 (2) (A) of the	Written permission from the mining commissioner	Ministry of Mines and Energy (MME)
Licence	Minerals Act, No.33 of	in the form of an Exclusive Prospecting Licence	
	1992	(EPL 8792) has been issued to date.	
Vegetation Clearing	Forestry Act No. 12 of 2001	A permit is required for the removal or clearing of	MEFT
		any vegetation.	
Water abstraction permit	Water Act, 1996	This Act provides for "the control, conservation	Ministry of Agriculture, Water and Land
		and use of water for domestic agricultural, urban	Reform (MAWLR)
		and industrial purposes; to make provision for the	
		control, in certain respects and for the control of	
		certain activities on or in water in certain areas".	
		The Ministry of Agriculture, Water and Land	
		Reform Department of Water Affairs is responsible	
		for the administration of the Water Act. The	
		Minister may issue a Permit in terms of regulations	
		5 and 9 of the government notice R1278 of 23 July	
		1971 as promulgated under section 30 (2) of the	
		Water Act no. 54 of 1956, as amended. To abstract	
		water from a controlled water source, a WA 002	
		should be filled and submitted to the MAWF	
Notice of Intention to	Water Resources	Despite any other law to the contrary, a person	Ministry of Mines and Energy (MME)
drill	Management Act, 2004	who proposes to drill a new borehole, or to	
		improve any existing borehole, for the purpose of	
		searching for or extracting minerals or other	
		substances, or for road construction or any other	
		purposes other than exploring for groundwater	

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Permit or licence	Act or Regulation	Related activities requiring a permit	Relevant Authority
		must inform the Minister of such proposal; furnish	
		the Minister with such data and information as the	
		Minister may require in connection with such	
		borehole drilling or improvement; and take such	
		measures as may be required by the Minister for	
		conserving and protecting groundwater. Any	
		excess water collected as a result of any operation	
		contemplated in subsection (1) must be disposed	
		of as prescribed	

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# **4 PROJECT DESCRIPTION**

### 4.1 NEED FOR THE PROJECT

The mining sector in Namibia contributes to the country's Gross Domestic Product (GDP), government tax receipts and export revenues. For this reason, exploration activities are encouraged in Namibia. The vision of the Minerals Policy is to "attract investment and enable the private sector to take the lead in exploration, mining, mineral beneficiation and marketing" supports mineral exploration and development.

The proposed Project is in line with this vision and has the potential to create employment in local communities in the Erongo Region. If exploration activities are successful, and a resource can be defined as having commercially viable mineral concentrations, then socio-economic development can be realised in the region.

### 4.2 ALTERNATIVES CONSIDERED

In terms of the Environmental Management Act, No. 7 of 2007 and its regulations, alternatives considered should be analysed and presented in the EIA reports. This requirement ensures that during the design evolution and decision-making process, potential environmental impacts, costs, and technical feasibility have been considered, which leads to the best option(s) being identified.

Exploration activities range from extremely low impact exploration such as remote sensing from satellites to more intensive methods such as closely spaced drilling. The methods that will be used are based on the exploration programme which is adjusted as more information and data is obtained. At this stage of the Project, the exploration programme is yet to be finalised and therefore a range of options exist. All the options and methods have been identified to ensure all the potential impacts on the environment and society are assessed.

#### 4.2.1 NO-GO ALTERNATIVES

Should exploration activities within EPL 8792 not take place, the anticipated environmental impacts from exploration activities would not occur. However, the social and economic benefits associated with the Project would also not materialise. Additionally, there would not be an opportunity to define resources within the Project area, which would be a missed opportunity for geological mapping and data collection that typically adds to regional knowledge of Namibia's mineral wealth and, if found to be viable for mining, would benefit the Namibian economy.

#### 4.3 EXPLORATION METHODOLOGY

All geological and geophysical work will be conducted by contractors. The schedule of activities is presented in Table 6.t



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**Table 6 - Preliminary Exploration Schedule** 

Phase	Date	Activity Description
1	1 month	Acquire Government Mag/Rad and Geology
1	2 months	Interpret data, literature search and review
2	1 month	Ground truth Anomalies
2	2 months	Soil and rock sampling
2	2 months	Geochemical sampling
2	2 months	Ground Rad survey
2	2 months	EM survey
3	2-3 months	If warranted shallow RAB and or RC drilling

Exploration activities on EPL 8792 will include soil and rock sampling, geological mapping, electromagnetic and geophysical surveys, drilling and core sampling. Some vegetation may be cleared to allow access tracks and working areas to be created and for the installation and development of exploration drill holes. Detail of these methods are as follows:

#### REMOTE SENSING AND GEOPHYSICAL SURVEYS

During mineral exploration, remote sensing and geophysical surveys enables explorers to find and assess deposits without having to undertake massive exploration operations. Remote sensing may be used to map the geology and existing faults and fractures that localise the ore deposits or may be used to recognise rocks which have been hydrothermally altered. Remote sensing includes a few tools and techniques including geographical information systems, radar, geographical information systems and sonar.

#### **GROUND PENETRATING RADAR**

Ground penetrating radar is a non-destructive geophysical survey that can detect subsurface features without drilling, probing, or digging. This method is likely to be the preferred method for exploration activities within the EPL. This will most likely be undertaken on foot.

#### **REVERSE CIRCULATION (RC) DRILLING**

Drilling is to be undertaken to obtain drill core samples. The collected samples will be temporarily stored in plastic bags on site and transported to a sample preparation laboratory at Tschudi or in Swakopmund.

All exploration activities will be undertaken in programmed segments. The number of drill holes will be determined from results obtained ground penetrating radar data. Equipment used during drilling shall include a trailer-mounted rig towed by a light vehicle.

Pitting and trenching is not planned for this exploration project, so it has not been included in the impact assessment of this scoping report.



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Existing tracks shall be used as far as reasonably practicable. If new tracks are required, they will be developed by hand or by use of 4x4 vehicles. The chosen method will depend on the terrain. Vegetation clearing will be limited to clearing for access tracks and site camps. Any established or large trees or specially protected plant species shall not be removed, and access tracks will be routed to avoid these. Where some clearing is required, permits must be obtained.

#### 4.3.1 EXPLORATION SCHEDULE

The exploration activities will be executed and managed from the Elevate Exploration Office in Swakopmund. Field exploration activities, using techniques as discussed above, are likely to occur throughout the license validity period. Remote sensing studies and planning phases for the prospecting programme will require 3 months. Geochemical sampling will be undertaken concurrently with geological mapping for approximately 2 months. Geophysical surveys will then be carried out over a period of about 2 months after which the Project will advance to reverse circulation or core drilling.

The duration of drilling programs is variable, and usually depends on the information that is gained from drilling. Renewal applications for the environmental clearance certificate and other permits will be made should a renewal of the EPL be required.

### 4.3.2 EQUIPMENT AND MATERIALS

During the exploration phase double and single cab vehicles will be used to transport workers to, from and around the site. Field activities will be organized in Swakopmund. The contractor's camp infrastructure includes tents and chemical toilets, which would be set up on site temporarily if park entry permit, permits it. A drill rig (track-mounted) will be brought to site for drilling, along with a water truck and supporting equipment (rods truck, water and fuel bowsers, and RC compressor) for use during drilling are also on the drill rig.

#### 4.3.3 POWER SUPPLY

The individual contractors will be responsible for supplying their own energy needs throughout the duration of their stay within the field camps. The Proponent prefers the use of small-scale generators.

### 4.3.4 WATER SUPPLY

Water will be required for various uses including human consumption during the planned exploration activities. Water required for exploration activities will be trucked to site by the drilling support vehicles.



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#### 4.3.5 ACCOMMODATION

Ten to twenty personnel will be required during exploration activities. Staff will be accommodated in designated field camps located within the EPL and within the exploration camp infrastructure which includes tents and toilets as per Park requirements.

#### 4.3.6 WASTE MANAGEMENT

Waste produced on-site will include solid waste such as packaging material and field camps household waste. Hazardous waste if any, such as (hydrocarbon contaminated soil, etc.) will be disposed of at the Walvis Bay municipal waste handling site. The Proponent must ensure waste is collected in categorised bins and that the waste hierarchy of (reduce, reuse, and recycle) is practiced as practically as possible. All waste will need to be removed from the Conservancy and disposed of at the Henties Bay or Swakopmund landfill or waste recycling sites.

#### 4.3.7 WASTEWATER EFFLUENT

Wastewater (e.g., water with drill additives) used during drilling is recycled, contained, and allowed to evaporate after use. Sewerage produced through using mobile toilets must be removed off-site by the responsible contractor. No wastewater may be discharged into the environment unless suitable treatment facilities are constructed and any discharge into the environment meets the necessary specifications.

#### 4.3.8 REHABILITATION

Once exploration activities are completed the areas must be rehabilitated to a condition as close to the original state as possible. Rehabilitation methods must be determined prior to the commencement of the exploration programme and shall be agreed with the landowners and authorities as per legislation (discussed in Section 3). Before and after photographs will be used to monitor rehabilitation success. The Proponent is committed to restoring all disturbed areas from their activities.



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### 5 ENVIRONMENT AND SOCIAL BASELINE

A detailed environmental and socio-economic baseline is provided in this section. A description of the existing biophysical environment is given. This section has been compiled from a desktop study, followed by site verification.

#### 5.1 LAND USE

EPL 8792 is situated to located east of Henties Bay in the Erongo Region. Access to the EPL can be obtained via the D1918 between Usakos and Henties Bay. This region has mixed agriculture (livestock and communal lands), tourism, conservation, light industry and mining activities. The EPL falls within the =/=Gaingu conservancy. The land use in the immediate vicinity of the EPL may either be livestock farming or tourism undertaken by the residents of the local communities to the east.

### 5.2 CLIMATE

The climatic conditions characterising the EPL area are warm summers and cool winters with the mean temperatures between 19°C and 21°C, mean maximum temperatures ranging between 26°C and 31°C and mean minimum temperatures ranging between 7°C to 19°C. The hottest months of the year are between February and May and the coolest months are in June and September (Bubenzer, 2002 & Meteoblue, 2022).

The months with the highest humidity, have a humidity of approximately 70% RH, and the driest months have a humidity of approximately 20-30% RH. The average rainfall in this area during the year is between 50 to 100 mm and rainfall events are limited to the summer months, mainly between January and April. Potential evaporation is between 3000 and 3200 mm per year (Bubenzer, 2002) as shown in Figure 3.

The site has wind speeds between 0 and 19 km/h, where the months of September to March are known to be the windiest months. Wind can occur any time of the day and the most predominant wind directions for this area are NE, SW and SSW (Figure 4) (Meteoblue, 2022).

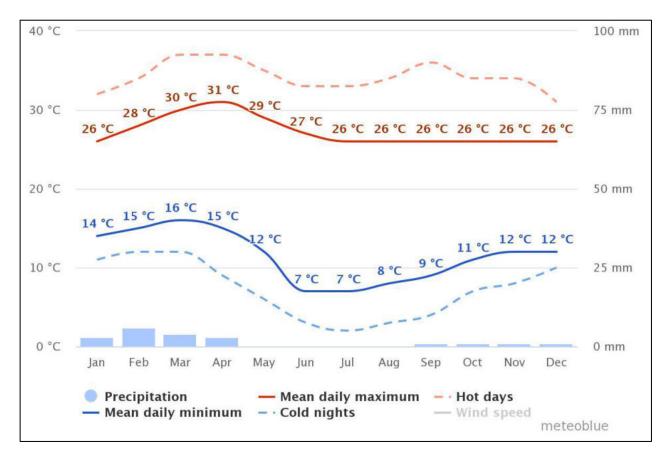


Figure 3 - Climate of the area



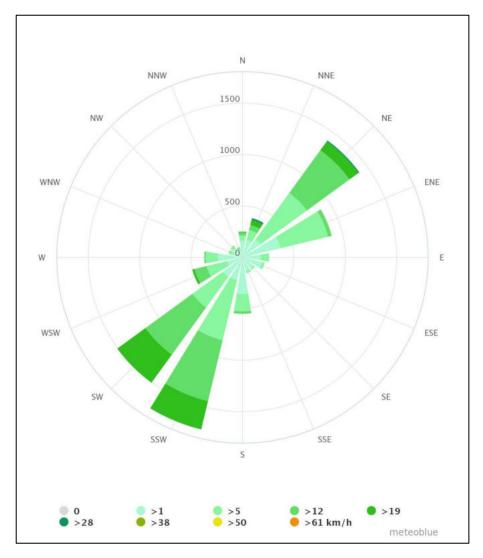


Figure 4 - Average wind speed and direction in this area

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### 5.3 Soil, Geology and Topography

The geology over which the EPL falls mainly consists of the Swakop group (Damara supergroup and Gariep complex). The main rock type is metamorphic sedimentary rocks such as schists and dolomites (Bubenzer, 2002) as shown in Figure 5.

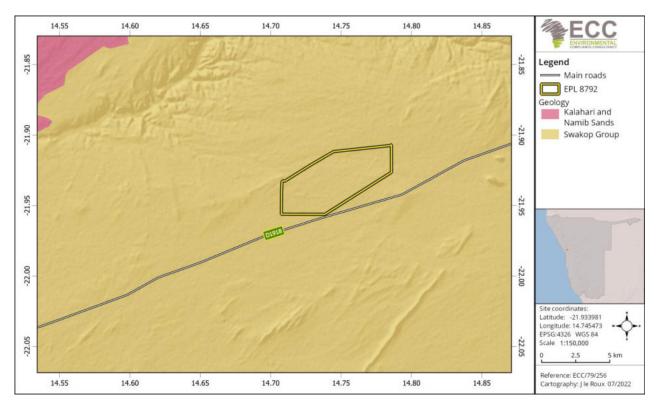


Figure 5 - Geology of the area

The topography of the EPL area is relatively flat with larger rocky outcrops to the north-eastern side of the EPL. The elevation of the EPL increases steadily from west to east as shown in Figure 6. The highest point being about 603 m above sea level and the lowest point is just below 486m above sea level.

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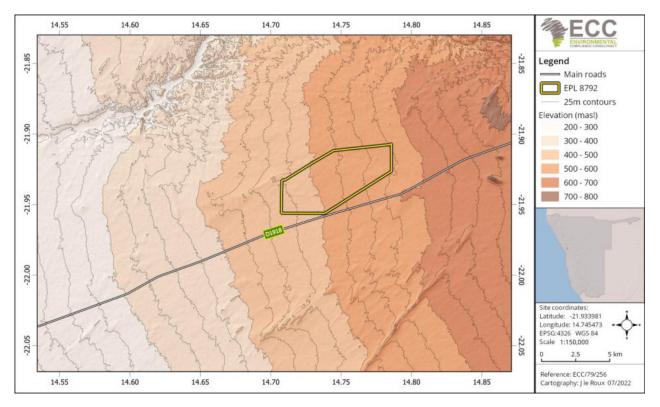
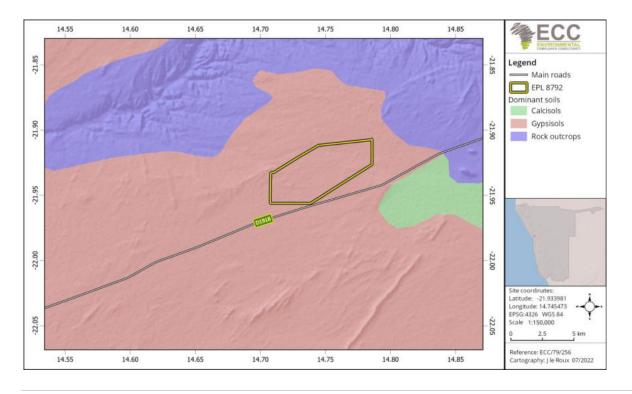


Figure 6 - Elevation of the area

Namibian soils vary a great deal on a broad scale with a great deal of variability at a local level. The EPL is mainly covered with petric Gypsisols. Petric means soils with a solid layer at a shallow depth that remains hard even when wet. Gypsisol means soils with an accumulation of calcium sulphates which is often restricted to areas that are very dry, such as in the central Namib. Figure 7 is a map showing the distribution of the soil types in the area.





### Figure 7 - Soil Characteristics of the area

### 5.4 Hydrogeology

According to the Namibian Monitoring Information System & Hydrological Map of Namibia (<a href="https://na-mis.com/">https://na-mis.com/</a>) the site falls mainly over rock bodies with little to very low or limited groundwater potential. The groundwater vulnerability in this area is very low and groundwater recharge within this area is considered to be very low (0% of the total average rainfall). Groundwater in this area is generally of poor quality not suitable for human consumption. This EPL falls over the Erongo groundwater basin and has many minor drainage lines running through the EPL. The EPL also falls with the Omaruru catchment area as shown in Figure 9.

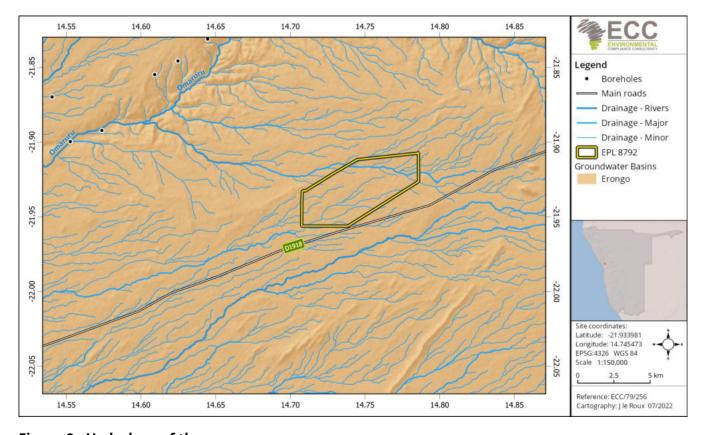


Figure 8 - Hydrology of the area

### 5.5 BIODIVERSITY BASELINE

#### 5.5.1 FLORA

Vegetation in Namibia is strongly influenced by rainfall. The plant diversity and tallest trees are most lush in the north-eastern parts of the country and contrast sparser and shorter to the west and south of the country. This gradient is not simple as factors such as soil types, landscape and human impacts may also influence the vegetation. The plant diversity (> 150 species) for this area is very low with moderate endemism (6 to 15 species) and the dominant vegetation structure for the EPL is Namib grassland, the vegetation type is Central desert and the EPL falls within desert

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biome the dominated by lichens and *Psilicoulon salicornioides* (Mendelsohn et al. 2002). Figure 9 shows the location of the EPL within the central desert vegetation cover.

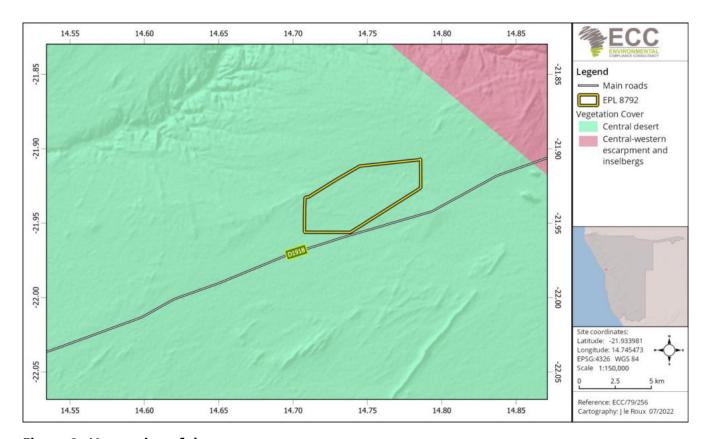


Figure 9 - Vegetation of the area

### 5.5.2 FAUNA

The overall terrestrial diversity for the area is low compared to other parts of the country. The area in which the EPL lies has a high bird diversity status of about 11-140 species (residents and migrants), with a low to moderate bird endemism (between 6 to 15 species) and represents an area with moderate mammal diversity of between 46-60 species (7-8 of these species are endemic). (Bubenzer, 2002, IUCN, 2021, Mendelsohn et al., 2002, Oberprieler and Cillié, 2008 & Stuart and Stuart, 2015).

Furthermore, the reptile diversity within this area is moderate with between 51 - 60 species, 21-24 endemic species (moderate); the number of observed lizard species for this area is between 28 to 31 of which 12-14 species are endemic (moderate) and the different snakes recorded are between 15 to 19 species (9-10 endemic species). This area also has a very low frog diversity of between 2 to 3 species, and also a low scorpion endemism of 7-8 species. (Bubenzer, 2002 & Mendelsohn et al., 2002).



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### 5.6 Social and socio-economic baseline

Erongo Region is clustered into seven constituencies (Arandis, Daures, Karibib, Omaruru, Swakopmund, Walvis Bay Rural and Walvis Bay Urban). The region's capital town is Swakopmund. Local authorities govern the towns in a form of municipalities. The Erongo Region occupies 10563.5km² of Namibia's 824292 km² total surface area and lies approximately 270 km northwest of the central Khomas Region.

#### 5.6.1 EMPLOYMENT

Overall, the rate of unemployment is estimated at 33.4 % for Namibia, using the broad definition of unemployment. More than 60 % of the population is over 15 years of age and about one-third of the total population can be regarded as part of the labour force. The unemployment rate in rural and urban areas is almost the same – 33.4 % in urban areas and 33.5 % in rural areas (NSA, 2019). The youth group also ranks high in unemployment levels, even though many Namibia youth complete post-secondary education. In 2018 the unemployment level was at 59.6 % for those aged 15-19, 57 % for those aged 20-24, and 42.3 % for 25-29-year-olds (NSA, 2018).

#### 5.6.2 ECONOMIC ENVIRONMENT

Mining plays a pivotal role in the economy of Namibia. Since independence, it has consistently been the biggest contributor to Namibia's economy in terms of revenue and accounts for 11% of the country's income (National Planning Commission, 2021). Mining is one of the main contributors to GDP, and one of the largest economic sectors of Namibia.

In 2022 Namibia recorded a growth of 4.6% which was mainly driven by mining (especially due to the growth of the diamond production) due to the fact that this industry saw a growth of 45.1% growth in 2022. Primary industries saw a growth of 12.9% mainly attributed to mining and quarrying falling under this industry (Namibia Statistics Agency, 2022).

Secondary industries saw a recovery from 2021 of 3.3% (Namibia Statistics Agency, 2022). However, agricultural industries have been negatively impacted due to drought and the war in Ukraine. With ever increasing fuel prices, inflation has increased to a high of 6.1%, an all-time high since 2017 thus affecting the most vulnerable (The World Bank, 2023).

#### 5.6.3 CULTURAL HERITAGE

From the Namibian GIS data and information from the Atlas of Namibia and other sources, there are no sites of concern within the EPL boundaries. There are no sites of concern from any of the following categorised archaeological periods:- 1.8 million to 10000 years ago; past 10000 and 2000 years; or within the last 2000 years (Bubenzer, 2002 & Mendelsohn et al., 2002). Regardless, there is still the potential to uncover previously undiscovered heritage remains. A chance finds plan must be incorporated into the EMP.



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# 6 IMPACT IDENTIFICATION AND EVALUATION METHODOLOGY

### 6.1 Introduction

The impact assessment method described in this chapter by ECC is designed to systematically identify and evaluate potential environmental and social impacts that may arise from a proposed project. The method takes into consideration the baseline characteristics of the Project area and assesses the significance of impacts based on various factors including the sensitivity and value of environmental and social receptors the nature characteristics of the potential impact and the magnitude of potential change.

### The method provides:

- assessment guidance that is used to evaluate impacts;
- It acknowledges any limitations, uncertainties and assumptions associated with the assessment methodology;
- It outlines how impacts are identified and evaluated, and how the level of significance is derived;
- The method also addresses the application of mitigation measures in the assessment and how additional mitigations are identified.

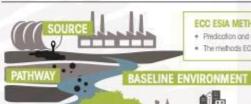
This chapter provides a structured approach for evaluating the potential impacts of a proposed project on the environment and social aspects. It considers various factors to determine the significance of impacts and provides guidance on how to identify and evaluate potential impacts. It also recognises the limitations and uncertainties associated with impact assessment methodologies, which adds transparency and credibility to the assessment process.

Overall, this chapter provides a comprehensive and systematic approach for conducting impact assessments, which can help ensure that potential environmental and social impacts are thoroughly evaluated and addressed in the decision-making process for the proposed project. However, it is important to note that the effectiveness of this method would ultimately depend on its implementation and the accuracy of the baseline data and assumptions used in the assessment. Therefore, regular reviews and updates of the methodology based on new information and feedback from stakeholders would be recommended to improve its accuracy and relevance.



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#### **ECC ESIA METHOD**

- · Predication and evaluation of impacts is a key step in the EIA process.
- The methods ECC follows to identify and evaluate the impacts arising from projects is outline in this diagram.

# BIOPHYSICAL







#### DETERMINE THE SIGNIFICANCE OF AN IMPACT

#### SENSITIVITY AND VALUE OF A RECEPTOR

The sensitivity and value of a receptor is determined by identifying how sensitive and vulnerable a receptor is to change, and the importance of a receptor (internationally, nationally, locally)

#### NATURE AND CHARACTERISTICS OF THE IMPACT

impact is determined through consideration of the frequency, duration, reversibility and probability of the impact occurring.

#### MAGNITUDE OF CHANGE

The magnitude of change measures the scale or edent of the change from the baseline condition, inespective of the value. The magnitude of change may after over time, therefore temporal variation is considered (shad-term, mealum-lum, long-term, reversible, inversible entvarimental assessment methodology.

#### THE FOLLOWING PRINCIPLES ARE USED BY ECC FOR **ASSESSMENTS**

- International Finance Corporation International Finance Corporation stendands and models, in particular Performance Standard 1, "Assessment and management of environmental and social risks and impacts' (International Finance Corporation, 2017) (International Finance Corporation, 2012);
- International Finance Corporation CIA and Management Good Practics Handbook (International Finance Corporation, 2013) and
- Namibian Draft Procedures and Guidance for EIA and EMP (Republic of Namibia, 2008).

### ECC - NATURE OF IMPACT

### BENEFICIAL (POSITIVE)

An impact that is considered to represent on improvement on the boseline or introduces a positive change.

#### ADVERSE (NEGATIVE)

An impact that is considered to represent an adverse change from the baseline or introduces a new undestrable factor.

#### REVERSIBILITY



fulure

#### PARTLY REVERSIBLE

Some parts of the impact can be reversed while others remain

IRREVERSIBLE Impacts which are not reversible and are permanent

### DIRECT

Impacts cousing an impact through direct interaction between a planned project activity and the receiving environment/ receptors.

#### ECC - TYPE OF IMPACT

MAGNITUDE OF CHANGE

#### ( ) INDIRECT

Impacts that result from other activities that are encouraged to happen as a result / consequence of the Project. Associated with the project and may occur at a later time or wider area

#### CUMULATIVE

impacts that arise as a result of an impact and effect from the project interacting with those from another activity to areate an additional impact and effect

#### DURATION

### TEMPORARY SHORT TERM a period of less than 1 year

ON-SITE

Impacts that are limited to the boundaries of the

proposed project site

impacts that are likely to last for the duration of the activity cousing the impact and are recoverable (1-5 years)

# **MEDIUM TERM**

Impacts that are likely to continue after the activity cousing the impact and are recoverable (5-15 years)

SCALE OF CHANGE - EXTENT / GEOGRAPHIC SCALE

LOCAL

Impacts that occur in the local area of influence, including around the proposed site and within

the wider community

### LONG TERM

PERMANENT Impacts that are likely to last far beyond the end of the activity causing the damage (greater than 15 years with impact coasing other decommissions after decommissioning of the project)

REGIONAL

impacts that affect a receptor that is regionally important by virtue of scale

designation, quality or rarity

### VERY HIGH /

Loss of resource, significantly affecting the long term quality and integrity of a resource; ineparable damage or loss of key characteristics, features or elements; or the magnitude is too great to quantity as it is unknown.

#### HIGH / MAJOR

UNKNOWN

Loss of resource, and quality and integrity of resource; severe damage to key characteristics, features at elements; or Large socie or major improvement of resources quality, extensive restoration or enhancement, major improvement of attribute quality.

### MODERATE

Loss of resource, but not adversely affecting its integrity; partial loss of/damage to key characteristics, features or elements; or Benefit to, or addition of, key characteristics, features or elements; improvements of attribute quality

### LOW /

Some measurable change in affirbutes, quality or vulnerability; minor loss of, or afteration to, one (or maybe more) key characteristic, feature

#### MINOR

Minor benefit to, or addition of, one (or maybe more) key characteristic, feature or element, some beneficial effect on affitbule quality or a reduced risk of a negative effect occurring.

#### NONE / NEGLIGIBLE

Very minor loss or detrimental alteration to one (or maybe more) characteristic, feature or element; or

Very minor benefit to, or positive addition at, one (or maybe more) characteristic, teature or element.

#### NATIONAL

impacts that affect a receptor that is nationally important by virtue of scale, designation, quality or rarity.

### INTERNATIONAL

impacts that affect a receptor that is nationally important by virtue of soale, designation, quality or rarity

#### PROBABILITY

#### IMPROBABLY (RARE)

The event may occur in exceptional circumstances yet, poly occurs in the industry. The event could occur once every 100 years

#### LOW PROBABILITY (UNLIKELY) MEDIUM PROBABILITY (POSSIBLE) HIGH PROBABILITY (LIKELY)

The event has happened elsewhere yet, is unlikely to occur. The event could occur once every 10 years

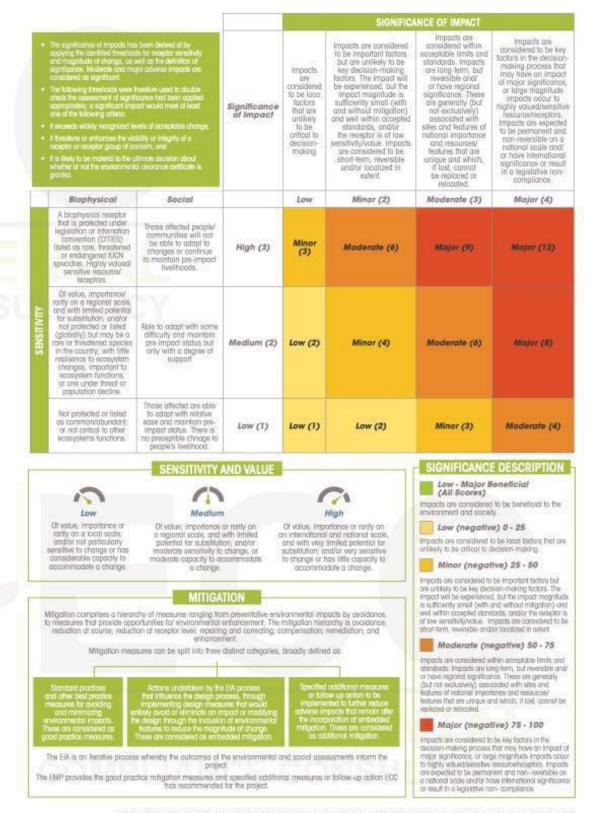
The event could occur under some circumstances. The event could occur once every 5 years:

The event is expected to occur. The event could occur fwice per year.

#### DEFINITE (ALMOST CERTAIN)

The event will occur. The event could occur once per month





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Figure 10 - ECC assessment methodology



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### 6.2 Assessment guidance

The principal documents used to inform the assessment method are:

- International Finance Corporation standards and models, in particular Performance Standard 1, 'Assessment and management of environmental and social risks and impacts' (International Finance Corporation, 2017) (International Finance Corporation, 2012);
- International Finance Corporation CIA and Management Good Practice Handbook (International Finance Corporation, 2013); and,
- Namibian Draft Procedures and Guidance for EIA and EMP (Republic of Namibia, 2008).

### 6.3 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS

The limitations and uncertainties associated with the assessment methodology in Namibia were observed:

 To include the absence of topic-specific assessment guidance with a generic methodology being applied based on IFC (International Finance Corporation) guidance and professional judgement.

This implies that there may be limitations in terms of tailoring the assessment to specific topics or issues relevant to Namibia, and that the methodology may not fully capture the unique characteristic and nuances of the local context.

The impact assessment process also acknowledged the presence of uncertainties, and assumptions were made based on realistic worst-case scenarios to ensure that potential environmental impacts were identified and assessed comprehensively. These assumptions and uncertainties were identified and documented during the assessment process shown in Table 7 in line with best practice.

A cautious approach was applied where uncertainties existed, allowing for the identification and assessment of potential impacts based on worst-case scenarios. The limitations and uncertainties were acknowledged and described in the baseline section of the assessment, indicating transparency and awareness of potential limitations in the methodology.

It is important to note that the limitations and uncertainties identified in the assessment methodology may introduce potential biases or inaccuracies in the assessment results. Therefore, it is recommended to regularly review and update the methodology to address these limitations and uncertainties, and to ensure that it remains robust and relevant for the specific context of Namibia. Additionally, incorporating stakeholder feedback and local knowledge can also contribute to improving the accuracy and comprehensiveness of the assessment process.



Table 7 - Limitations, uncertainties and assumptions

LIMITATION / UNCERTAINTY	ASSUMPTION
Number of access roads and temporary drill campsites	The making of new tracks or access roads will be avoided, and existing tracks and routes will be used as far as possible. While every effort will be made to minimise environmental damage, in some cases it will be necessary to clear some vegetation. Temporary campsites near the drill sites may be required.
The program of exploration works is not confirmed	It is assumed that exploration work shall be undertaken in campaigns over the course of the licence period. Activities involve drilling; aerial or remote sensing; geophysical surveys; and mineral sampling. Pitting and trenching are not considered for this project is unlikely and generally not favoured.  If commercially viable concentrations can be defined by preliminary drilling, a next phase of advanced resource drilling operations is possible.
Number of workers, area they will come from and accommodation	It is planned that approximately ten people will be contracted for the proposed project. Contractors may camp near exploration sites but will need the approval of the conservancy leaders.
Structures	No permanent infrastructure will be developed during any phase of project activities during the 3-year mineral licence period.



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# 7 IMPACT ASSESSMENT FINDINGS AND PROPOSED MITIGATION MEASURES

This chapter presents the findings of the impact assessment for the proposed project, with a focus on significant potential impacts. The design of the proposed project and best practice measures were considered during the assessment to identify likely significant impacts and recommended mitigation measures.

A summary list of potential impacts was provided including water (surface and groundwater), soil, landscape (visual impacts, sense of place), socioeconomics (employment, demographics, and land-use), noise, ecology (fauna and flora), air quality (emissions, pollutants, and dust), and heritage (including culture, history, archaeology, and palaeontology).

Table 10 in the report outlines the findings of the impact assessment, identifying the activities that could be the source of impacts, the receptors that could be affected, and the pathways between them. Where activities or receptors have not been identified and analysed, potential impacts are deemed unlikely, and no assessment or justification is provided. Justification for further assessment may or may not be required where the activity, receptor, and pathway have been identified and analysed.

The nature and localised scale of the exploration activities, as well as the environmental context of the EPL, are expected to limit the potential environmental and social effects, should they occur. However, uncertainties related to potential increase in movements and presence of people, which may lead to illegal and covert activities such as poaching, stock theft, and collection of organisms, were identified. Accidental veld fires may also increase with the presence of contractor personnel, potentially affecting terrestrial ecology and biodiversity in Namibia, as well as local landowners and their neighbours. Mitigation measures are recommended and provided in Table 10 to address these potential impacts.

Cumulative impacts resulting from physical disturbance, noise, dust, and loss of sense of place may be experienced by farm owners, neighbours, visitors, and tourists. Mitigation measures are recommended and provided in Table 8 to address these impacts. Precautions must also be taken to prevent damage to heritage sites, and a chance find procedure will be implemented if paleontological remains are discovered during exploration activities. With the necessary mitigation measures in place, the significance of the impact reduces from moderate to minor, as outlined in the report.

It is important to ensure that the recommended mitigation measures are effectively implemented and monitored during project implementation to minimise potential impacts and ensure compliance with environmental regulations and best practices. Regular monitoring and review of



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the impacts and effectiveness of mitigation measures should also be conducted throughout the project lifecycle to address any emerging issues and make necessary adjustments to the mitigation measures as needed.



Table 8 - Scoping assessment findings and proposed mitigation measures

Description	Details		
Aspect	Water		
Description of activity	Site operations such as maintenance activities could lead to compromised containment of hazardous materials, e.g., accidental fuel / hydraulic fluid leaks and spills, or similar sources.		
Description of impact	Hydrocarbon leaks and spills contamination	could enter the aquifer causing	
Assessment of impact	Receptor	Groundwater quality	
	Effect/description of	Adverse	
	magnitude	Direct	
		Partly Reversible	
		Moderate	
		Short term	
		Regional	
		Possible	
	Value of sensitivity Medium		
	Magnitude of change Minor		
	Significance of impact prior	Minor (4)	
	to mitigation		
Impact	- Good housekeeping and to	raining through toolbox talks and	
management/control measures	<ul> <li>induction</li> <li>All stationary vehicles and machinery must have drip trays to collect leakages of lubricants and oil</li> <li>Spill kits and absorption material must be available during fuel delivery, storage or use</li> <li>Accidental spills and leaks (including absorption material) must be cleaned as soon as possible</li> <li>Major spills to be reported, also to the authorities</li> <li>Maintenance and service schedules on equipment is in place</li> <li>Store bulk fuel (200L or more) in adequate containment areas (non-porous surface, bunded) and discard damaged containers</li> <li>Employ preventative measures when service and maintenance activities are carried out (drip trays, non-porous surfaces, funnels, non-damaged containers)</li> <li>Refuelling must be done in areas with adequate preventative measures in place</li> <li>Servicing equipment must not be done in the field</li> </ul>		
Residual impact after	Low (2)		
mitigation			



Description	Details		
Aspect	Water		
Description of activity	Potential spillages of drill fluid, lubrication, etc. or drilling that penetrate the groundwater table.		
Description of impact	Hydrocarbon leaks and spills could enter the aquifer causing contamination		
Assessment of impact	Receptor	Groundwater quality	
	Effect/description of	Adverse	
	magnitude	Indirect	
		Partly Reversible	
		Minor	
		Short term	
		Local	
	Possible		
	Value of sensitivity	Value of sensitivity Low	
	Magnitude of change	Minor	
	Significance of impact prior to	Low (2)	
	mitigation		
Impact	- Ensure spill kits and preventative measures (e.g., drill pads) are in		
management/control	place at exploration sites.		
measures	- Drill pad layout must include channels to direct any accidental		
	spills into sumps.		
	•	Il fluids and therefore this risk is	
	significantly reduced.		
		P will be in place for managing drill	
	•	ling - this will be signed off by the	
	proponent prior to use.	m the drill site should be kept to an	
		n the drill site should be kept to an	
		ploration. Where possible, water	
Posidual impact after	should be pumped from existing water sources.		
Residual impact after mitigation	Low (1)		
IIIILIgation			



Description	Details	
Aspect	Water – surface and groundwater	
Description of activity	Discharge and infiltration of non-contained wastewater.	
Description of impact	Wastewater can contaminate su	rface and groundwater.
Assessment of impact	Receptor	Surface and ground water
	Effect/description of	Adverse
	magnitude	Direct
		Partly Reversible
		Minor
		Short term
		Regional
		Unlikely
	Value of sensitivity	Low
	Magnitude of change Minor	
	Significance of impact prior	Low (2)
	to mitigation	
Impact	- All wastewater discharges m	nust be contained, and if possible
management/control	recycled in the drilling proces	SS
measures	– Unrecyclable wastewater mu	st be removed from site and taken
	to site where discharge of wa	astewater is permitted.
	- Workers will be made aware	e of the importance of wastewater
	management	
	- Good housekeeping	
	- Ensure prompt clean-up of spills	
	- Contaminated soils should be remediated off-site	
Residual impact after	Low (1)	
mitigation		



Description	Details	
Aspect	Water	
<b>Description of activity</b>	Inadequate management of solid waste.	
<b>Description of impact</b>	Waste items and litter can pollut	e drainage channels.
Assessment of impact	Receptor	Surface and ground water
	Effect/description of	Adverse
	magnitude	Cumulative
		Reversible
		Minor
		Temporary
		On-site
		Unlikely
	Value of sensitivity	Low
	Magnitude of change	Low
	Significance of impact prior	Low (1)
	to mitigation	
Impact	- Good housekeeping	
management/control	- Training and awareness thro	ugh toolbox-talks and induction
measures	– Implement a Standard Oper	ational Procedure (SOP) on waste
	management, for all kinds	of waste possible on-site (e.g.,
	domestic, mineral, hydrocark	oons, hazardous)
	- Implement a culture of correct waste collection, waste	
	segregation and waste disposal.	
Residual impact after	Low (1)	
mitigation		



Description	Details		
Aspect	Soil - impacts		
Description of activity	Inadequate management of hazardous and hydrocarbon waste.		
Description of impact	Pollution of soil.		
Assessment of impact	Receptor	Soil	
	Effect/description of	Adverse	
	magnitude	Direct	
		Reversible	
		Minor	
		Short term	
		On-site	
	Possible		
	Value of sensitivity Low		
	Magnitude of change	Minor	
	Significance of impact prior to	Low (2)	
	mitigation		
Impact	<ul> <li>Good housekeeping</li> </ul>		
management/control	<ul> <li>Training and awareness through</li> </ul>		
measures		tional Procedure (SOP) on waste	
		of waste possible on-site (e.g.,	
	domestic, mineral, hydrocarbo	·	
	<ul> <li>Avoid hazardous waste on site</li> </ul>		
	'	correct waste collection, waste	
	segregation and waste disposa		
		remediated off-site, either by the	
	'	nediation site or taken to the Walvis	
	Bay hazardous waste site		
Residual impact after	Low (1)		
mitigation			



Description	Details	
Aspect	Terrestrial ecology and biodiversity	
Description of activity	Vegetation clearing for access routes, drill pads and temporary	
	contractor's camp.	
Description of impact	Loss / alteration of terrestrial h	abitats and loss of species
Assessment of impact	Receptor	Terrestrial ecology and
		biodiversity
	Effect/description of	Adverse
	magnitude	Direct
		Reversible
		Minor
		Short term
		On-site
		Possible
	Value of sensitivity	Low
	Magnitude of change	Minor
	Significance of impact prior	Low (2)
	to mitigation	
Impact	<ul> <li>Use existing roads for access</li> </ul>	ss to avoid new tracks and cut lines
management/control	– Minimise clearance areas	through proper planning of the
measures	exploration activities	
	<ul> <li>Promote revegetation of cl</li> </ul>	leared areas where possible upon
	completion of exploration a	activities
	- Apply for vegetation clearing permits before removing any	
	vegetation.	
Residual impact after	Low (1)	
mitigation		



Description	De	etails
Aspect	Terrestrial ecology and biodiversity	
Description of activity	Ambient noise and vibration caused by moving or stationary machinery and equipment (e.g., drill rigs, generators, vehicles, airplanes, and drones).	
Description of impact	Resident, slow-moving and nesti excessive noise or vibration	ng organisms may be disturbed by
Assessment of impact	Receptor	Terrestrial ecology and biodiversity
	Effect/description of magnitude	Adverse Direct Reversible Minor Short term On-site
		Likely
	Value of sensitivity	Low
	Magnitude of change	Minor
	Significance of impact prior to mitigation	Low (2)
Impact management/control measures	<ul> <li>Restrict excessive noise to areas of activities only</li> <li>Restrict excessive noise to daytime hours (7 am to 5 pm weekdays and 7 am until 1 pm on Saturday)</li> <li>No activities between dusk and dawn</li> <li>Drill equipment shall be suitably positioned to ensure that noisy equipment is away from receptors</li> <li>Maintain and carry out routine equipment checks</li> <li>All equipment to be shut down or throttled back between periods of use,</li> <li>Respect civil aviation regulations about the use of drones</li> </ul>	
Residual impact after mitigation	Low (1)	



ASPECT	TERRESTRIAL ECOLO	GY AND BIODIVERSITY
Description of activity	Increased movement of vehicles	, machinery and equipment.
Description of impact	Residing and nesting organisms such as reptiles can be disturbed,	
	injured or killed.	
Assessment of impact	Receptor	Terrestrial ecology and
		biodiversity
	Effect/description of	Adverse
	magnitude	Direct
		Partly reversible
		Moderate
		Short term
		On-site
	Value of sensitivity  Possible  Low	
	Magnitude of change	Minor
	Significance of impact prior	Low (2)
	to mitigation	
Impact	- Restrict movements to areas	of activities only
management/control	- Use existing tracks and route	es only
measures	- Identify rare, endangered, th	reatened, and protected species in
	advance	, , ,
	- Route new tracks around pro	otected species and sensitive areas
	- Restrict movements to daytir	·
		ess routes (into the bush) / off-road
		ess routes (into the busil)/ on-road
	driving	
	- No animals or birds may be collected, caught, consumed, or	
	removed from site	
Residual impact after	Low (1)	
mitigation		



Description	Details	
Aspect	Terrestrial ecology and biodiversity	
<b>Description of activity</b>	Increased disturbance of areas with natural vegetation.	
<b>Description of impact</b>	Alien species and weeds can be in	troduced to the area.
Assessment of impact	Receptor	Terrestrial ecology and
		biodiversity
	Effect/description of	Adverse
	magnitude	Direct
		Reversible
		Minor
		Short term
		On-site
		Possible
	Value of sensitivity	Low
	Magnitude of change	Minor
	Significance of impact prior to	Low (2)
	mitigation	
Impact	<ul> <li>All project equipment arriving</li> </ul>	on site from an area outside of the
management/control	project or coming from an are	ea of known weed infestations (not
measures	present on the project site) s	hould have an internal weed and
	seed inspection completed pri	or to equipment being used
	- Monitor areas of activity for w	
	- Eradicate weeds and alien species as soon as they appear	
	Eradicate weeds and alleri spe	cies as soon as they appear
Residual impact after	Low (1)	
mitigation		



Description	Details	
Aspect	Soil	
Description of activity	Accidental and uncontrolled fire	
Description of impact	Increased exposure due to possible vegetation clearance can cause	
	soil erosion.	
Assessment of impact	Receptor	Terrestrial ecology and
		biodiversity
	Effect/description of	Adverse
	magnitude	Direct
		Partly Reversible
		Low
		Short-Term
		Local
		Unlikely
	Value of sensitivity High	
	Magnitude of change	Negligible
	Significance of impact prior to	Minor (3)
	mitigation	
Impact	- Restrict movements of people	to areas of activity only
management/control	- Train people and raise awaren	ess about veld fires and firefighting
measures	- No open fires outside desig	gnated areas are allowed in the
	National Park	
	Ensure proper cooking facilities at the contractor's campsite	
	o a constant of the constant o	
	disposed of at an appropriate	•
	·	n signage to be placed in areas that
		hydrocarbons and gas bottles)
	<ul> <li>Control and reduce the poten</li> </ul>	tial risk of fire by segregating and
	storing materials safely	
	- Avoid potential sources of igni	tion by prohibiting smoking in and
	around certain facilities	
		always be at designated areas and
	should be maintained and che	-
		ckeu regularly.
Residual impact after	Low (2)	
mitigation		



Description	Details		
Aspect	Soil		
<b>Description of activity</b>	Drilling and the use of drilling equipment.		
Description of impact	Loss of soil quality due to mixing of earth matter, trampling and compaction.		
Assessment of impact	Receptor	Soil	
	Effect/description of	Adverse	
	magnitude	Direct	
	Reversible		
		Moderate	
		Short term	
		On-site	
		Possible	
	Value of sensitivity	Low	
	Magnitude of change	Minor	
	Significance of impact prior to	Low (2)	
	mitigation		
Impact management/control measures	<ul> <li>Ensure erosion control and prevention measures are in place when vegetation clearance is required</li> <li>Where necessary, plan access routes, drill pads and camps outside of existing drainage lines</li> </ul>		
	<ul><li>Where necessary, install diversions to curb possible erosion</li><li>Restore drainage lines when disturbed</li></ul>		
Residual impact after mitigation	Low (1)		



Description	Detail		
<b>Description of activity</b>	Airborne surveying over the EPL, p	oossible low flying	
<b>Description of impact</b>	Perceived impact from surveying activities on livestock and humans		
Assessment of impact	Receptor	Community and livestock	
_	Effect/description of	Adverse	
	magnitude	indirect	
		Reversible	
		Minor	
		Temporary	
		Local	
		Unlikely	
	Value of sensitivity	Low	
	Magnitude of change	Minor	
	Significance of impact prior to	Low (2)	
	mitigation		
Impact	<ul> <li>Two weeks prior to conducting</li> </ul>	g aerial surveying, affected parties	
management/control	should be informed.		
measures	- The following information is	s to be included in the written	
	communication sent affected parties:  > Company name,		
	<ul><li>Survey dates, time, and duration,</li></ul>		
	> Purpose of the survey,		
	<ul><li>Flight altitude,</li></ul>		
		f survey area and flight lines, and	
	,	f survey area and flight lines, and	
	> Contact details for enq		
	- Comply with all applicable law	•	
	- Maintain continuous engagement with residents to identify any		
	concerns or issues, and appropriate mitigation and management		
	measures agreed upon		
	- Ensure appropriate supervision of all activities		
	- Restrict surveying activities t	o daytime hours (7 am to 5 pm	
	weekdays and 7 am until 1 pm on Saturday unless there are no nearby residents in which case normal weekday times would		
	apply)		
Residual impact after	Low (1)		
mitigation			



Description	Details		
Aspect	Heritage		
Description of activity	Drilling activities, movement of n	nachinery and vehicles.	
Description of impact	Potential damage to cultural heritage sites.		
Assessment of impact	Receptor	Heritage	
	Effect/description of	Adverse	
	magnitude	Direct	
		Partly Reversible	
		High	
		Permanent	
		On-site	
		Possible	
	Value of sensitivity	High	
	Magnitude of change	Minor	
	Significance of impact prior	Moderate (6)	
	to mitigation		
Impact	- Implement a Chance Find Pro	ocedure	
management/control	- Raise awareness about possi	ble heritage finds	
measures	- Report all finds that could be	of heritage importance	
	- In case archaeological remair	ns to be uncovered, cease activities	
	and the site manager must assess and demarcate the area		
	- Project manager to visit the site and determine whether work		
	can proceed without damage to findings, mark exclusions		
	boundary and inform ECC with GPS position		
		ation must be requested for a	
	,	d the necessary protocols of the	
	Chance Find Procedure must	•	
	- Archaeologist will evaluate the significance of the remains and		
	identify appropriate action, (record and remove; relocate or		
	, , , , , , , , , , , , , , , , , , , ,	on the nature and value of the	
	remains),		
	- Inform the police if the remains are human,		
	- Obtain appropriate clearance or approval from the competent		
	authority, if required, and recover and remove the remains to		
		National Forensic Laboratory as	
	directed.		
		ay resume once the green light is	
	given by the relevant competent authority.		
Residual impact after	Minor (4)		
mitigation			



Description	Details		
Aspect	Community		
<b>Description of activity</b>	Drilling activities, resulting into dust emissions		
	Windblown dust from exposed/cleared land during exploration		
	activities		
<b>Description of impact</b>	Visual disturbance and loss of se	nse of place.	
Assessment of impact	Receptor Community		
	Effect/description of	Adverse	
	magnitude	Direct	
		Reversible	
		Moderate	
		Temporary	
		Local	
		Likely	
	Value of sensitivity	High	
	Magnitude of change	Minor	
	Significance of impact prior	Moderate (6)	
	to mitigation		
Impact	<ul> <li>Apply dust suppression where</li> </ul>	re possible	
management/control	<ul> <li>Restrict speed of vehicles (&lt;3</li> </ul>	30km/h)	
measures	– Specific activities that may generate dust and impact nearby		
	farmers or tourists.		
	<ul> <li>Dust generating activities sho</li> </ul>	ould be avoided during strong wind	
	events		
	<ul> <li>All vehicles and machinery / equipment to be shut down or throttled back between periods of use</li> </ul>		
	'		
	Barriers or fences shall be used if drilling occurs in locations that		
	may affect farmers, farmer's livestock or tourists passing by along the dirt roads.		
		icable need to be informed at least	
	two weeks in advance that di	rilling operations are within 1km of	
	their property		
	<ul> <li>Maintain good housekeeping</li> </ul>	5	
	<ul> <li>Continuous engagement with residents to identify any</li> </ul>		
	concerns or issues, and appropriate mitigation and management measures agreed upon.		
Residual impact after	Minor (4)	·	
mitigation			



Description	Details		
Description of activity	Movement of vehicles, exploration activities		
Description of impact	Presence of exploration team can be blamed for stock theft and		
	poaching.		
Assessment of impact	Receptor	Community	
	Effect/description of	Adverse	
	magnitude	Cumulative	
		Reversible	
		Minor	
		Temporary	
		Local	
		Unlikely	
	Value of sensitivity	Low	
	Magnitude of change	Low	
	Significance of impact prior	Low (1)	
	to mitigation		
Impact	Develop and implement an operation manual or procedures		
management/control	to work on farmlands		
measures	,	grammes and keep register of	
	vehicle movement.		
	Maintain continuous engagement with residents to identify		
	any concerns or issues, and appropriate mitigation and		
	management measures agreed upon		
	Ensure appropriate supervision of all activities		
	Raise awareness and sensitize employees about contentious		
	issues such as stock theft and poaching		
	Accidents and incidents need to be reported to the project		
	manager and recorded in the incident register		
Residual impact after	Low (1)		
mitigation			



Description	Details	
Aspect	Community	
Description of activity	Exploration activities	
Description of impact	Promotes job creation, skills development, and opportunities for	
	the local economy.	
Assessment of impact	Receptor	Community
	Effect/description of	Beneficial
	magnitude	Direct
		Reversible
		Minor
		Short term
		Local
		Possible
	Value of sensitivity	Low
	Magnitude of change	Low
	Significance of impact	Low (2)
	prior to mitigation	
Impact	As far as possible promote local procurement	
management/control	Enhance the development of local skills where possible	
measures		
Residual impact after	Low Beneficial	
mitigation		



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### 8 ENVIRONMENTAL MANAGEMENT PLAN

The preliminary EMP for the proposed project is presented in Appendix A. It provides management options to ensure the potential impacts of the proposed project are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary.

The management measures should be adhered to during all stages of the exploration activities. All personnel involved in the exploration activities should be taught the content of the EMP to ensure all activities are conducted in an environmentally responsible manner. The objectives of the EMP are:

- To include all components of the development and operations of the project.
- To prescribe the best practicable control methods to lessen the environmental impacts associated with the project.
- To monitor and audit the performance of operational personnel as it relates to the EMP; and
- To ensure that appropriate environmental training is provided to responsible operational personnel.



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### 9 CONCLUSION

ECC's impact assessment methodology was used to conduct the environmental and social impact assessment for the proposed exploration activities on EPL 8792. This Scoping Report identified several potentially significant impacts that could arise from the proposed project.

Through the scoping process, it was determined that the only risk to the environment is related to cumulative impacts resulting from physical disturbance and noise. Impacts related to airborne dust are expected to be limited to vehicular traffic and drilling activities and these impacts will be localised and short lived. There will also be some release of exhaust fumes from machinery which may impact the immediate vicinity, but this will be of short duration. Additionally, drilling and machinery noise, could be a disturbance local resident, but this will also be of short duration as well. The analysis of the potential impacts and development of mitigation and management methods, the assessment concludes that the likely significance of effects on humans from the cumulative impacts of physical disturbance, noise, dust, and emissions will be temporary and result in a qualitative reduction in the sense of place. As such, these impacts are designated as having minor significance after mitigations are implemented.

Due to increased movements and presence of people, there is a potential threat of illegal and covert activities such as poaching, and collection of organisms. Through this investigation the significance of both impacts is indicated as moderate. However, numerous mitigation measures, with proven national success, exist for both impacts which reduce the significance to minor.

Heritage sites may exist around the EPL, and all precautions will be taken to prevent damage to heritage sites, due to of the exploration activities. The chance find procedure will be implemented in such a case and with the necessary mitigation measures in place, the significance of impacts reduces from moderate to minor.

All other social and environmental receptors that were scoped out as potentially significant impacts were deemed unlikely and therefore no further assessment was considered necessary. Various best practices and mitigation measures have been identified to avoid and reduce effects as far as reasonably practical. This will ensure that the environment is protected, and unforeseen effects and environmental disturbances are avoided.



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### **APPENDIX A - ENVIRONMENTAL MANAGEMENT PLAN**



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### **APPENDIX B - BACKGROUNG INFORMATION DOCUMENT**

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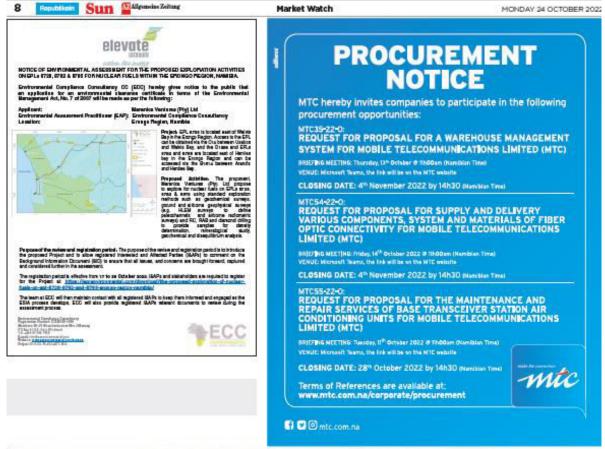
#### **APPENDIX C - NEWSPAPER ADVERTS**

Published in the Republikein, The Namibian Sun and the Allgemeine Zeitung on the 17<sup>th</sup> October 2022 and 24<sup>th</sup> October 2022.





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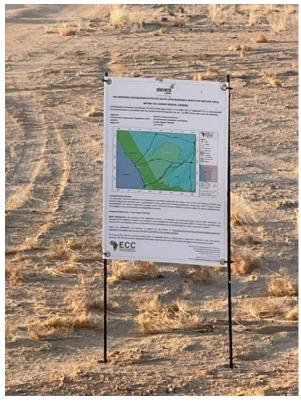






### **APPENDIX D - SITE NOTICES**







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#### APPENDIX E - STAKEHOLDER LETTERS

Environmental Compliance Consultancy (Pty) Ltd PO Box 91103 Klein Windhoek Namibia info@eccenvironmental.com www.eccenvironmental.com +264.81 669.7608



ECC-79-421-LET-08-A 10 May 2023

RECEIVED BY OFFICIAL STAMP					
Signature:					

P. O Box 21164

Windhoek

Namibia

#### IDENTIFIED STAKEHOLDER AND POTENTIALLY INTERESTED PARTY FOR:

The proposed exploration activities on EPL 8792 for Nuclear Fuels within the Erongo Region, Namibia.

RE – NOTIFICATION OF AN ENVIRONMENTAL ASSESSMENT OF THE PROPOSED EXPLORATION ACTIVITIES FOR NUCLEAR FUELS WITHIN EPL 8792, ERONGO REGION, NAMIBIA.

Dear Mr. Gaseb,

Environmental Compliance Consultancy (ECC) has been engaged by Marenica Ventures (Pty) Ltd (part of the Elevate Uranium Limited group of companies), the Proponent, as their environmental assessment practitioner to conduct the environmental clearance certificate application process in terms of the Environmental Management Act, No. 7 of 2007 for the proposed exploration activities for nuclear fuels within EPL 8792. The proposed Project is in the Erongo district, east of Henties Bay. The EPL can be accessed via the B1914 between Arandis and Henties Bay.

This letter is intended to engage potentially Interested and Affected Parties (I&APs) for the Project and provides a communication channel to ECC whilst the ESIA is ongoing. You have been identified as an interested or affected party and therefore ECC wishes to inform you of how you can interact with the ESIA.

The Proponent proposes to explore for nuclear fuels on EPL 8792 (Marenica West) using standard exploration methods such as geochemical surveys, ground and airborne geophysical surveys (e.g. HLEM surveys to define paleochannels and airborne radiometric surveys) and RC, RAB and diamond drilling to provide samples for density determination, mineralogical study, geochemical and disequilibrium analysis.

Public participation is an important part of the ESIA process, as it allows the I&APs to obtain information about the proposed project and provide feedback. Communication with the I&APs occurs at various stages throughout a project lifecycle including:

- Advertising in newspapers; public notice boards; public meeting(s);
- Distributing a Background Information Document (BID) to identified I&APs; available online at (https://eccenvironmental.com/projects/)

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

Page 1 of 2



Marenica Ventures (Pty) Ltd

+264 81669 7608 info@eccenvironmental.com www.eccenvironmental.com PO BOX 91193 Klein Windhoek Namibia



- Registered I&APs will also be informed of the available draft scoping report for a review period, during this period I&APs will have the opportunity to review the draft document and raise any issues or concerns; and
- I&APs who wish to register as such must do so on the ECC website as per the link provided below: https://eccenvironmental.com/download/the-proposed-exploration-of-nuclear-fuels-on-epl-8728-8792-and-8795-erongo-region-namibia/.
- If you are unable to complete the registration form online, please contact us via email for assistance at info@eccenvironmental.com.

Should you have any questions or require additional information, please do not hesitate to contact either of us.

Yours sincerely,

3

Stephan Bezuidenhout stephan@eccenvironmental.com dB-

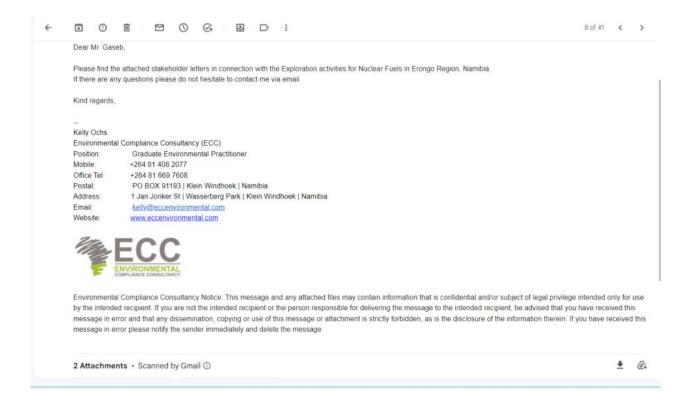
Jessica Bezuidenhout Mooney iessica@eccenvironmental.com

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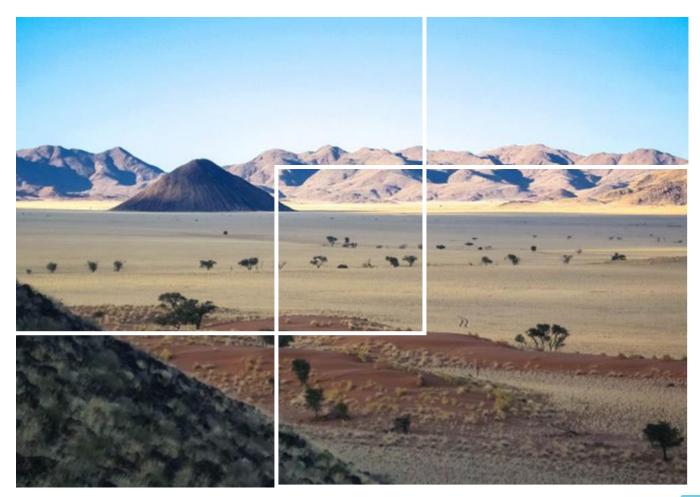
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### **APPENDIX F - EAP CV**





Submitted to: Marenica Ventures (Pty) Ltd Attention: Mr Murray Hill P O Box 90242 Klein Windhoek Windhoek, Namibia

### **REPORT:**

# BACKGROUND INFORMATION DOCUMENT FOR EXPLORATION ACTIVITIES ON EPL 8792, ERONGO REGION, NAMIBIA.

PROJECT NUMBER: ECC-79-421-BID-03-A

REPORT VERSION: REV 01

DATE: OCTOBER 2022





Marenica Ventures (Pty) Ltd

#### **TITLE AND APPROVAL PAGE**

Project Name: Background information document for exploration activities on

EPL 8792, Erongo Region, Namibia.

Client Company Name: Marenica Ventures (Pty) Ltd

Client Name: Mr Murray Hill

Authors: Monique Jarrett

Status of Report: For Internal Review
Project Number: ECC-79-421-BID-03-A

Date of issue: October 2022

#### **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: <u>info@eccenvironmental.com</u>

#### **DISCLAIMER**

Environmental Compliance Consultancy (ECC) (Reg. No. CC 2013/11401) has prepared this report on behalf of the Proponent. This report has been authored by employees of ECC, who have no material interest in the outcome of this report, nor do any of the ECC team have any interest that could be reasonably regarded as being capable of affecting their independence in the preparation of this report. ECC is independent from the Proponent and has no vested or financial interest in the Project, except for fair remuneration for professional fees rendered which are based upon agreed commercial rates. Payment of these fees is in no way contingent on the results of this report or the assessment, or a record of decision issued by Government. No member or employee of ECC is, or is intending to be, a director, officer, or any other direct employee of the Proponent. No member or employee of ECC has, or has had, any shareholding in the project. Any personal views or opinions expressed by the writer may not necessarily reflect the views or opinions of Environmental Compliance Consultancy or its client.

Please note at ECC we care about lessening our footprint on the environment; therefore, we encourage that all documents are printed double sided.

Marenica Ventures (Pty) Ltd

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### 1 BACKGROUND INFORMATION DOCUMENT

#### PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (ECC) has been contracted by Marenica Ventures (Pty) Ltd to conduct an environmental and social impact assessment (ESIA) and develop an environmental management plan (EMP), for exploration activities for nuclear fuels in the Erongo Region, Namibia. Consistent with the Environmental Management Act, 2007 and its regulations. An environmental clearance certificate application will be submitted to the Ministry of Environment, Forestry and Tourism (MEFT) for the Project, which is the relevant authority to make a Record of Decision (RoD) with regards to the proposed project.

The purpose of this Background Information Document (BID) is to provide Interested and Affected Parties (I&APs) a background to the proposed Project and to invite I&APs to register as part of the Environmental Social Impact Assessment (ESIA) process.

All those who register as an I&AP will be kept informed throughout the ESIA process. Registration provides a platform for participants to submit comments, concerns, or recommendations regarding the proposed project. This BID includes the following information:

- The proposed project and location
- The necessity of the project, benefits or adverse impacts anticipated
- The alternatives within the project that will be considered and assessed
- How the ESIA process works
- The public participation process and how to become involved
- Next steps and the way forward

#### DESCRIPTION OF THE PROPOSED PROJECT

The Proponent intends to carry out exploration activities of nuclear fuels on the Exclusive Prospecting Licence (EPL) 8792. The Proponent will conduct geological mapping, geochemical and geophysical surveys, and drilling (RAB, RC or DD/core drilling) if warranted.

The EPL is located east of Hentis Bay in the Erongo Region. Access to the EPL can be obtained via the D1918 between Usakos and Hentis Bay as set out in Figure 1.



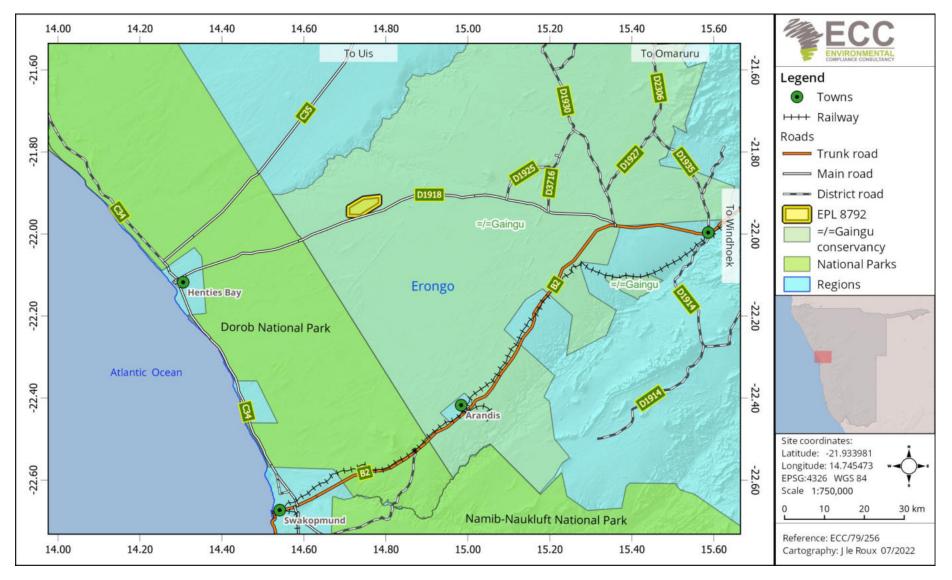


Figure 1 - EPL 8792 Locality Map



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In terms of Section 32 (1) of the Environmental Management Act, No. 7 of 2007, ECC has determined that the Ministry of Mines and Energy (MME) is the competent authority for the proposed mining project. The mining activity triggers the listed activities as per the Environmental Management Act Regulations. The relevant activities list provided later in the BID.

### NEED FOR THE PROJECT

The Proponent intends to pursue mineral exploration activities in Namibia with the aim of identifying new mining prospects. New mining activities could contribute to the national and local economies and may have a positive impact on the country's economy.

Namibia natural resources and the minerals sector are a key contributor to the nation's GDP in Namibia. Exploration could lead to mining activities, which would contribute to the national and local economy. The project is consistent with the National development plan.

#### **CONSTRUCTION AND OPERATIONAL PHASES**

The following are envisioned during the proposed Project:

- Minimal ground clearing for tracks, where existing tracks cannot be used,
- Ground and airborne geophysical surveying (eg HLEM surveys to define paleochannels and airborne radiometric surveys)
- Geochemical surveys, for sampling of soil or rock for geochemical analysis
- Drilling: RAB, RC or diamond drilling to provide samples for density determination, mineralogical study, geochemical and disequilibrium analysis.



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### **2 CONSIDERATION OF ALTERNATIVES**

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed project. In a project such as this one, it is difficult to identify alternatives to satisfy the need of the proposed Project; the activities shall be specific to EPL 8792 which was granted by the MME to Marenica Ventures (Pty) Ltd.

During the ESIA assessment, alternatives will take the form of consideration of optimisation and using eco-friendly solutions to reduce potential impacts. Some aspects where alternatives may be required could include:

- Different types of technology or operation
- Different access routes
- Different exploration techniques



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## 3 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PROCESS

The ESIA for the proposed project is being conducted by ECC and will be undertaken in terms of the Environmental Management Act, 2007 and its regulations. The process followed for this ESIA is set out in the flowchart in Figure 2.

A final decision relating to the above-mentioned application will be made by Ministry of Environment, Forestry and Tourism (MEFT), Department of Environmental Affairs (DEA).

The related environmental process will include:

- 1. Screening phase (completed)
- 2. Scoping phase which includes baseline studies and the development of the Terms of Reference (ToR) for the ESIA (initiated)
- 3. Assessment Phase which includes impact prediction and evaluation of alternatives, assigning mitigation measures and developing monitoring and conceptual rehabilitation plans. This phase culminates in the drafting of the ESIA report and draft Environmental Management Plan (EMP) and submission to the appropriate competent authorities

The main objectives of the ESIA are to:

- a) Provide information describing the proposed exploration activities;
- b) Provide an independent environmental and social assessment of the activities associated with the proposed project; and
- c) Develop management and mitigation measures associated with any identified potential impacts where necessary.



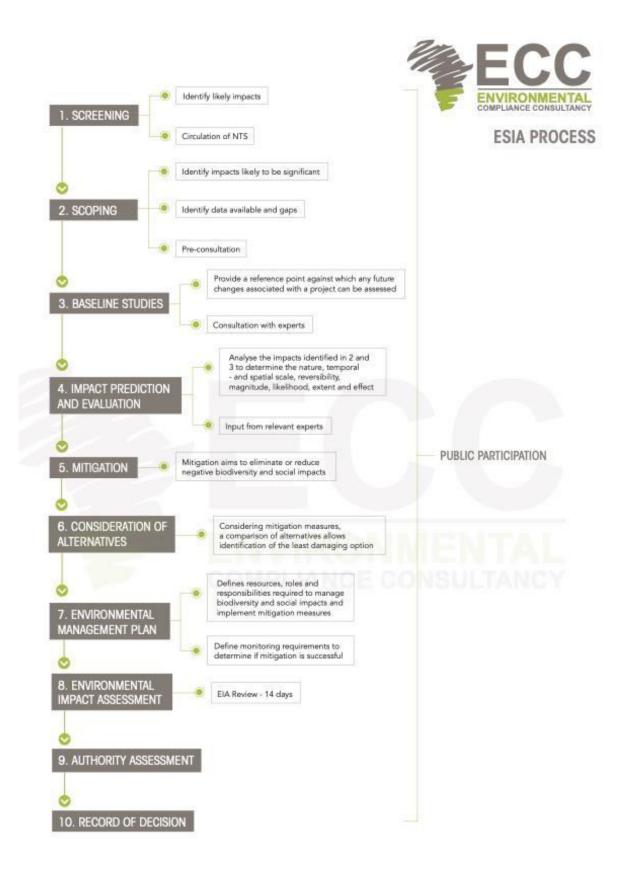


Figure 2 - Flowchart of the environmental and social assessment process



### 3.1 Screening

A review of the planned project was undertaken and the screening findings against the listed activities were identified, the findings of which are summarised in Table 1.

Table 1- Listed activities triggered by the proposed project

LISTED ACTIVITY	EIA SCREENING FINDING
WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES  (2.1) The construction of facilities for waste sites, treatment of waste and disposal of waste  (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste	<ul> <li>Waste generated which will be mainly solid waste and general waste during the exploration phase will be removed by a skip and will be disposed of at the nearest landfill site.</li> <li>A portable toilet, long drop hole for toilet or chemical toilets will be used during exploration activities.</li> </ul>
MINING AND QUARRYING ACTIVITIES  (3.1) The construction of facilities for any process or activities which requires a licence, right or other form of authorisation, and the renewal of a licence, right or other form of authorisation, in terms of the Minerals (Prospecting and Mining Act), 1992  (3.2) Other forms of mining or extraction of any natural resources whether regulated by law or not  (3.3) Resource extraction, manipulation, conservation and related activities	<ul> <li>The proposed project requires an environmental clearance from DEA/MEFT for the extraction of nuclear fuel minerals.</li> <li>Minerals (soil and sand), and nuclear fuel minerals will be sourced out within the project's footprint.</li> <li>The proponent will also undertake geochemical surveys, geophysical surveys, and RC drilling</li> </ul>
FORESTRY ACTIVITIES  (4.) The clearance of forest areas, deforestation, aforestation, timber harvesting or any other related activity that requires	Limited vegetation clearing may be required for tracks and survey access creation, and possibly for the set up for survey and drilling teams' field camps. Clearing of large trees will be avoided.

ECC Report Nº: ECC-79-421-BID-03-A



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ENVIRONMENTAL	Marerica veritures (Fty) Ltu		
LISTED ACTIVITY	EIA SCREENING FINDING		
authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or			
any other law.			
WATER RESOURCE DEVELOPMENTS	For the drilling of exploration boreholes, ground water may need to be abstracted, or water will be sourced.		
(8.1) The abstraction of ground or surface water for industrial or			
commercial purposes.			
HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE	<ul> <li>Portable toilets, long drop holes for toilets, or chemical toilets will be used during the exploration activities.</li> </ul>		
(9.2) Any process or activity which requires a permit, licence or			
other form of authorisation, or the modification of or changes to existing facilities for any process or activity which requires an			
amendment of an existing permit, licence or authorisation or which			
requires a new permit, licence or authorisation in terms of a law			
governing the generation or release of emissions, pollution, effluent or waste.			
chiache of wase.			



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#### 3.2 SCOPING

The scoping phase is directed towards defining the range and nature of anticipated potential impacts that may have significance to the biophysical and social environments at the scale of the proposed operations. The appropriate available data and the literature are identified forming the starting point for the assessment of the required baseline and specialist studies that may be required for assessment of the project impacts.

#### 3.3 BASELINE STUDIES

The ESIA will focus on the environmental receptors that could be affected by the proposed project. ECC will also engage with stakeholders, I&APs, and the proponents to seek input into the assessment. The baseline studies chapter is divided into three sections:

- The baseline context;
- Environmental (physical and biological), and
- Social (including economic).

Desktop studies a well as all available field surveys and specialist studies from the project area will be used to help define the baseline. These studies also give a further indication whether there are any local or regional future developments that could impact the project or vice versa.

Lastly the socio-economic section of the baseline studies helps to gain information on the governance, demographic profile, social stratification (employment, education, crime, infectious disease), occupation and livelihood (economic activities, occupations in study area, employment rates), land patterns (noise and vibrations) and access to services (drinking water, sanitation, etc.).

#### 3.4 STAKEHOLDER ENGAGEMENT

The public and key stakeholders receive invitations to register as I&APs. After the presentation of the proposed project and ESIA process through he defined public consultation process, a period of time for input will be granted for the Environmental Assessment Practitioner (EAP) to receive any additional concerns or comments from registered I&AP's. All feedback from the initial public consultation process will be incorporated into the scoping report.

#### 3.5 SCOPING REPORT

The scoping report will be drafted and made available to the registered I&APs for comment before being submitted to the competent authority and MEFT. The scoping report will contain a description of the project and the biophysical and socio-economic environments, the specialist baseline studies, the stakeholder engagement report and the terms of reference for the ESIA.



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#### 3.6 Environmental and social impact assessment phase

#### 3.6.1 POTENTIAL IMPACTS

The potential social and economic impacts should be considered with due regard to the nature and scale of the proposed operations its location within the broader ecological, commercial and social environments. The potential environmental and social impacts that have been anticipated may include the following:

- Water use, contamination, and management;
- Waste management;
- Waste resource management;
- Visual impacts;
- Biodiversity impacts;
- Jobs will be created as a result of the proposed exploration activities.
- Potential to unearth, damage or destroy undiscovered heritage remains;
- Minor disruptions to residents of neighbouring farms, due to potential noise and dust generation as a result of the proposed exploration activities.

#### 3.6.2 DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

An EMP shall be developed for the proposed project setting out auditable management actions for the project to ensure careful and sustainable management measures are implemented for their activities in respect of the surrounding environment and community. The EMP becomes the legally binding commitments upon approval of the EMP and issuing of the environmental clearance certificate. Environmental clearance certificates are issued for a period of 3 years and renewal is subject to compliance with the provisions and conditions of the environmental clearance certificate.



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### **4 THE WAY FORWARD - PUBLIC PARTICIPATION**

Public participation is an important part of the ESIA process. It allows you, the public and stakeholders to raise concerns or provide valuable local environmental knowledge that can benefit the assessment process as well as aid the planning process for the scoping phase of the defined assessment process. At this phase ECC will perform the following:

- Prepare and submit the application for the environmental clearance certificate in the prescribed manner
- Identify relevant key stakeholders, authorities, municipalities, environmental groups and interested or affected members of the public, hereafter referred to as I&APs
- Carry out a public consultation process in accordance with Regulation 21 of the EMA 2007 including:
  - Distribute the BID for the proposed Marenica Ventures (Pty) Ltd exploration project (this document)
  - Advertise the environmental application and call for registration of I&APs in two national newspapers
  - Open the project I&AP register and record all comments of I&APs and present both comments and responses provided by ECC, in the comments and responses report, which will be included in the scoping report and submitted with the application
- Prepare a scoping report and provide it to registered I&APs for comment
- Submit the scoping report and the I&AP comments to the competent authority and Environmental Commissioner for a record of decision

Your request for registration as an I&AP as well as any comments on the BID or Project must be submitted in writing and can be emailed using the details in the contact us section below. Registration as an I&AP for the project can be completed online on ECCs website on the projects page, or by using this link: <a href="https://eccenvironmental.com/download/the-proposed-exploration-of-nuclear-fuels-on-epl-8728-8792-and-8795-erongo-region-namibia/">https://eccenvironmental.com/download/the-proposed-exploration-of-nuclear-fuels-on-epl-8728-8792-and-8795-erongo-region-namibia/</a>

Registration as an I&AP should be submitted on or before **16 October 2022**.

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

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At ECC we make sure all information is easily accessible to the public.

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