

Meeting minutes and attendance register _EPL 7011

12 Sept 2022

PUBLIC CONSULTATION MEETING MINUTES:

ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED PROSPECTING & EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) 7011 LOCATED NEAR ARANDIS IN THE ERONGO REGION

Date: Thursday, 08 September 2022

Time: 09:00 – 09:40

Venue: Arandis Town Hall

The public consultation meeting was attended by 7 people, including two environmental consultants and an archaeologist from Excel Dynamic Solutions (Pty) Ltd (EDS) - **Please refer to the attached attendance register.**

INTRODUCTION AND WELCOMING REMARKS

The meeting was officially opened by Mr Silas David, an Environmental Assessment Practitioner (EAP) from Excel Dynamic Solutions (Pty) Ltd. Furthermore, He expressed gratitude to everyone in attendance for making time to attend the meeting.

The meeting attendance register was then circulated for the attendees to write down their names, and contact details and sign so that they could be added to the list of Interested and Affected Parties (I&APs) and receive further information on the ESA process.

MEETING AGENDA AND PRESENTATION

The agenda of the meeting included the following main points:



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2.1 Brief Description of the Project

Mr David provided a short description of the planned project and its associated activities, the Environmental Scoping Assessment (ESA) process, and the reason the proponent appointed Excel Dynamic Solutions (Pty) Ltd (EDS), an independent environmental consultant to carry out the EIA and apply for the Environmental Clearance certificate (ECC).

2.2 Presentation of Potential Project Impacts

To ensure transparency and clarity for the attendees, the Environmental Consultants also presented the potential pre-identified potential positive & negative environmental and social impacts.

2.3 Public Open Discussion (Interactive Session)

Mr David provided the meeting attendees the opportunity to raise their concerns/issues and or comment on the proposed project activities. The issues and comments recorded are presented in **Table 1** below

Table 1: Comments and issues raised during the public consultation meeting, 08th of September 2022

Comment/ issue No.	Commenter name & issue / comment / question	Response and name of responder:
1.	<p>Commenter 1: Rossing Uranium Limited (RUL) has concerns regarding this proposed project. A large portion of the EPL runs over RUL mine accessory works area, where there are tailing facilities. This area also has RUL monitoring boreholes, and other activities unfold as a result of the mine operations.</p> <p>Another concern is the announcements that were made by the proponent on public domains about the EPL. It came off as though they have already done the exploration on the EPL.</p> <p>ML 28 was extended until 2036 and the accessory works area was approved even though the law does not speak on Accessory work areas.</p> <p>The company has drafted a formal complaint with the Ministry of Mines and Energy on the issues.</p>	<p>Mr Silas David (SD): Thank you for the comment, you stated that the accessory works area falls within EPL 7011 and this was approved already. How the approval was done for these activities and in connection to how the EPL was granted by MME, is something I cannot comment on at the moment. The mining cadaster (MME online portal) shows that there is no overlap between the property of Rossing (ML 28) and EPL 7011.</p> <p>We appreciate your position with respect to this aspect and raising your concerns with regard to this matter. These are very important concerns to us as this also allows us to develop aspects such as no-go zones in terms of sensitivity and we will appreciate it if your office can give us a map to show us where the accessory works area is, and where the monitoring boreholes are located.</p>

Comment/ issue No.	Commenter name & issue / comment / question	Response and name of responder:

Comment/ issue No.	Commenter name & issue / comment / question	Response and name of responder:
2.	<p>Commenter 2: The monitoring boreholes located within the EPL 7011 help us to monitor the RUL operation, to ensure that we take immediate action in the case of any contamination.</p> <p>Considering where the EPL is located, we may experience problems in cases where we pick up contamination from our boreholes. It may be hard to determine whether the source of pollution is our operations or the exploration works from the Proponent of this EPL</p>	<p>Mr SD: We take note of that.</p>

FINAL REMARKS AND CONCLUSION OF THE MEETING

Mr David thanked the attendees for their crucial input through comments and raising their concerns. He indicated to the attendees that all their comments, concerns and inputs had been noted down for consideration and addressing in the Environmental Scoping Assessment (ESA) Report as well as incorporating their recommendations into the draft EMP.

Furthermore, Mr David informed the attendees that the draft meeting minutes, Environmental Assessment Report, and Environmental Management Plan (EMP) will be shared with them for review and further comments. These documents will be made available through emails provided on the attendance register.






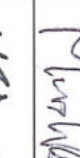

Once the review of the draft ESA Report and EMP is done, the documents will be finalized and submitted to the Environmental Commissioner at the Department of Environmental Affairs and Forestry (DEAF) for evaluation and consideration of an ECC.

The meeting adjourned at 09h40.

Public Meeting Attendance Register

PROJECT: ENVIRONMENTAL SCOPING ASSESSMENT (ESA) ON EXCLUSIVE PROSPECTING LICENCE (EPL) No. 7011
LOCATED NEAR ARANDIS, ERONGO REGION

Venue: Arandis Town Hall
Date: 09.09.08 September 2008
Time: 09:00

No	Name	Organization	E-mail Address	Telephone Contact	Signature
1.	Martin Tipita	Rössing Uranium	martin.tipita@rossing.com.na	0811224213	
2.	EDWIN TIEMANS	Rössing Uranium	edwin.tiemans@rossing.com.na	0812007769	
3.	STEFANS GAESEB	Rössing Uranium	stefans.gaeseb@rossing.com.na	0812007769	
4.	George Munkela	SELF	george.munkela@gmail.com	0811430847	
5.	Sibas David	ENDS	sdavid@ends.na	0817180038	
6.	Roland Mushi	ENDS	rolandmushi@endsonline.na	0813332372	
7.	Iyabo Ndaba	ENDS	iyabo.ndaba@gmail.com	0813490996	
8.					
9.					

Newspaper adverts _EPL 7011

SPORT

Ode to a mother of stars - Maria Tjihero

• CONRAD ANGULA



Maria Tjihero

DISCIPLINARIAN, strict, a strategist, loving and caring are just some of the adjectives used by Kapena Tjombone to describe her late mother Maria Tjihero, during an exclusive interview with The Namibian on Saturday. The respected matriarch of the famous Tjihero siblings succeeded to illness on 6 August 2022, and will be laid to rest at Okavango village, in the Ojozondjupa region, on Saturday, 20 August.

Mama Maria, as she was fondly known, enjoyed a 64-year marriage with her late husband Festus Tjihero, who passed on in 2005, leaving the parenting duties of their nine-children solely in the hands of his wife.

She clearly didn't disappoint because she helped shape the lives of her children, who all grew up to become very prominent personalities and members of society. The Tjihero siblings are: Agatha Hamu (the eldest); Deborah the played drama (deceased); Albert Hoonjo (captain of African Stars, South West Africa, Liverpool); Erica Mengo (played netball and the mother of hockey star Magroth Mengo); Alex (played rugby and netball); Jansuar Foetsie Kambofuka (husband); Jansuar (African Stars, South West Africa, Liverpool); Bimbo (captain of African Stars, Brave Warriors, Liverpool); and Kapena Tjombone (played netball for Liverpool and Namibia).

Explains Tjombone, who is the last born of the children: "We are what we are today because of the support of our mother. Our mom lived a purpose-driven life. Her purpose, we believe, was to be productive and fruitful and to provide and care for others."

Mama Maria was instrumental in over 100 San people being issued with plots with kraals and small livestock at Ojjuwa to reserve, in the Otjomuho constituency, so that they could sustain themselves. Her death will also leave a void in their lives.

Notices

• Name Change •

THE ALIENS ACT 1937... NOTICE OF INTENTION TO CHANGE OF SURNAME 1. I, [Name], currently residing at [Address]...

CLA202209264

Notices

NOTICE OF SALE BY EXECUTION... NOTICE OF SALE BY EXECUTION OF THE HIGH COURT OF NAMIBIA...

CLA202209247

Notices

• Legal •

NOTICE OF ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE PROPOSED PROJECTING & EXPLOSION ACTIVITIES ON EXCLUSIVE PROJECTING LICENCE (EPL) NO. 1294...

CLA202209253

Notices

• Legal •

NOTICE OF ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE PROPOSED PROJECTING & EXPLOSION ACTIVITIES ON EXCLUSIVE PROJECTING LICENCE (EPL) NO. 1294...

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CLA202209254

Notices

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NOTICE OF INTENTION TO CHANGE OF SURNAME... I, [Name], currently residing at [Address]...

CLA202209264

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CLA202209253

Obituaries

• In Memoriam •

In Memoriam

Meme-Kuku Sofia Naapopye Asino (Nujoma) 14 August 2020 marks two years since Dearest Mother transit to the heavens. In our hearts you will live forever...

Memorial Service Oruano Church, Ephraim Hei Street Katutura, Windhoek Thursday, 18th August 2022 18:00

Celebrating the Legendary Life of Our Queen, Our Beloved Mom, Grandmother, Great Grandmother Rest Softly, Mama Maria Tjihero

Funeral Okavango, Okondjatu Area, Otjozondjupa Region Saturday, 20th August 2022 7:00am

Concerns and comments recieved from stakeholders _EPL 7011



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king.frans.indongo@gmail.com

Excel Dynamic Solutions

Ms Aili Ipinge and Mr Silas David

112 Robert Mugabe Avenue

Windhoek

Copy to:

The Environmental Commissioner

Mr Timoteus Mufeti

Ministry of Environment, Forestry and Tourism

Windhoek

The Minister

Honourable Pohamba Shifeta M.P.

Ministry of Environment, Forestry and Tourism

Windhoek

23rd September 2022

Dear Sirs,

URGENT NOTICE OF OBJECTION TO YOUR PURPORTED ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

IN RE: PENNYWORT INVESTMENTS (PROPRIETARY) LIMITED – IN RE EXCLUSIVE PROSPECTING LICENCE EPL 7011

1. We act for our client **Rössing Uranium Limited** (hereinafter referred to as “our Client”).
2. We refer to your acting as environmental practitioners for Pennywort Investments (Proprietary) Limited with regard to exclusive prospecting licence EPL 7011.

3. We also refer to –
 - 3.1 our Client’s participation in the public meeting on 8th September 2022 and the several and material issues raised by our client before and during the course of such meeting; and
 - 3.2 the document dated “*Environmental Scoping Assessment (ESA) on Exclusive Prospecting License (EPL) No. 0711 Located Southwest of Arandis, Erongo Region*” (“**ESA**”), which you had provided to our Client on 13th September 2022, a mere 5 (five) days (!) after the public meeting, which we submit could hardly have been enough time for Excel Dynamic Solutions to thoroughly consider, research and assess the various serious and material issues raised by our Client with regard to the proposed prospecting operations of your client.
4. Moreover, by way of email dated 19th September 2022, you requested stakeholders that if they had “**any comments on the Draft Report**”, they were to provide such comments by the 23rd September 2022.
5. If the time period for providing comments on your report was wholly insufficient and rushed, our Client, on review of your ESA, takes note that the concerns of our Client were neither properly noted nor were they in addressed in the ESA in any meaningful manner.
6. More specifically, and in terms of section 6.3 of your ESA, the several and serious concerns raised by our Client are nonchalantly brushed aside as follows:

“Issues were raised by I&Aps (from the consultation meeting) and via email. These issues have been recorded and incorporated in the ESA Report and EMP. The summary of the key issues is presented in Table 5 below.”

Neither are the several and serious issues raised by our Client properly recorded in the ESA, as is falsely claimed, nor does Table 5 contain any key issues, but merely sets out the “*Extent or spatial impact rating*”.

7. In summary, our Client must come to the conclusion and submits that your ESA and the environmental impact and mitigation process conducted by Excel Dynamic Solutions has been conducted in a rushed manner, appears to be a mere formality to achieve an environmental clearance certificate for your client, and is in substance nothing but a total farce.
8. Accordingly, our Client has reason to believe that there is no true intent on the part of your firm or your client to conduct a proper environmental impact assessment to ensure “**that the significant effects of activities on the environment are considered in time and carefully**”, as is required by section 2 of the *Environmental Management Act, 2007*.

9. Our Client hereby provides Excel Dynamic Solutions with an opportunity to prove to our Client that it is acting as a responsible environmental practitioner, and that its environmental impact and mitigation assessment process is serious. To this end, our Client hereby insists on the following:
 - 9.1 That our Client's concerns and material issues as previously raised with you, be properly and in detail recorded and listed in your ESA, and that proper mitigatory measures (if available) be set out accordingly, and also in sufficient detail. In this regard, should Excel Dynamic Solutions – on account of the apparent haste by which the ESA was produced – have any unclarity as to what these concerns and material issues were, our Client invites Excel Dynamic Solutions to meet with our Client's legal and environmental team in order that the concerns and material issues can be properly explained and that it can be ensured that they are properly and correctly recorded in your ESA, with sufficient detail as required by law.
 - 9.2 That our Client be given at least until the **31st October 2022** to further investigate and formulate its concerns and issues, and that such concerns and issues be recorded verbatim – as provided by our Client – in your ESA.
 - 9.3 That your firm conducts the necessary investigations and studies on the basis of which the assessment of the environmental impact and the required mitigation steps are determined.
 - 9.4 That, following our Client's input under 9.2, that our Client be given a further 14 (fourteen) days after receipt of your updated ESA to comment on same.
10. Should Excel Dynamic Solutions persist in its current attitude to ignore our Client's request that its concerns and issues are properly recorded and considered (i.e. should Excel Dynamic Solutions refuse to accommodate our Client's reasonable request as set out under paragraph 9), and fail to engage with our Client with regard to the concerns and material issues, it will be accepted by our Client that neither Excel Dynamic Solutions nor its client Pennywort Investments (Proprietary) Limited are interested in conducting a serious and proper environmental impact assessment and mitigation process as required by law.
11. In that case, please be advised we would advise our Client challenge (whether by appeal in terms of section 50 of the *Environmental Management Act, 2007* or by way of review in the High Court of Namibia, as the case may be, or both) a decision by the Environmental Commissioner to grant Pennywort Investments (Proprietary) Limited on your current deficient ESA.
12. It is for this reason that we now already provide a copy of this letter to the Environmental Commissioner and the Minister of Environment, Forestry and Tourism, in order that both instances are placed in a position to investigate and consider the appropriateness of your work.

13. We trust that it will not be necessary to resort to court or other legal proceedings, and that you will now properly engage with our Client as proposed in paragraph 9.

We look forward to hearing from you as a matter of urgency.

Sincerely yours,

ENSAfrica | Namibia



Wolf Wohlers

Director

Tel: +264 61 379 769

E-mail: wwohlers@ensafrica.com

From	Angela Kapapilo; S Gaeseb; E Shinyongo
Department	Mining Operations
To	M Tjipita – GM Operations
CC	L Davies; R Khoeseb; G Josef; J Mwenze; K Abraham; T Murasiki
Reference	Draft Environmental Scoping Assessment (ESA) and Environmental Management Plan (EMP) for EPL7011
Date	17 February 2023
Number of pages	

Review of the Draft Environmental Scoping Assessment (ESA) and Environmental Management Plan (EMP) for EPL7011 (February 2023)

Rössing Uranium Limited (RUL) engaged Pennywort Investments (Pty) Ltd (Pennywort) and Excel Dynamic Solutions (Pty) Ltd (EDS) during an onsite meeting on 17 October 2022, to ensure that RUL concerns about the potential risks of overlaps between RUL AWAs and planned prospecting and exploration activities and later mining activities within EPL7011 are adequately addressed in the final ESA report for the EPL7011 ECC application by Pennywort. Pennywort subsequently provided a proposed exploration program to RUL on 22 November 2022, which was an insufficient response to concerns and actions agreed. RUL has now received the draft Environmental Scoping Assessment (ESA) and Environmental Management Plan for EPL7011 from Excel Dynamic Solutions (Pty) Ltd (EDS) and these have been reviewed for whether RUL concerns and agreed actions have been adequately recorded and addressed. The concerns RUL raised about the TSF stability, groundwater infrastructure, air quality and radiation exposure were recorded in the draft ESA. A summary of how the draft ESA and EMP documents addresses the concerns is provided in the table below.

RUL Area of Concern	Agreed Actions		Pennywort Proposal (Nov 2022)	ESA and EMP (Feb 2023)
<p>1. <u>TSF Stability</u>: RUL is concerned that blasting activities in the vicinity of the TSF during potential future mining activities would likely impact TSF stability</p>	1	<p><u>PennyWort and EDS</u>: provide RUL with a list of activities planned for the EPL target area – this list to be included in the ESA;</p>	<p>Only list of prospecting and exploration activities provided.</p>	<p>ESA: No exploration activities within 1 km of “EPL”; <i>the document should be changed to “No exploration activities within 1 km of “TSF”</i></p> <p>ESA: Should exploration be successful, geotechnical assessment of impact on TSF to be performed as part of EIA for Mining License application.</p> <p>ESA, 3.1.3 (pg. 32) – States that no blasting activities is anticipated to occur during the exploration phase for this project. This gives the impression that blasting activities might occur during exploration. <i>This needs to be clarified in the document. (See my comment in document for relevance).</i></p>
	2	<p><u>PennyWort and EDS</u>: will assign risk ratings per activity and review ratings with RUL.</p>	<p>Not provided</p>	<p>Still not included in report.</p>
<p>2. <u>Groundwater Quality</u>: RUL is concerned that prospecting and exploration activities could damage the RUL borehole network and supporting infrastructure and has requested that controls be put in place to prevent such damage.</p>	1	<p><u>PennyWort and EDS</u>: The Environmental Management Plan (EMP) will include controls to avoid damage to RUL infrastructure.</p>	<p>There is mention that the RUL no go areas will be avoided during the prospecting an exploration activities.</p>	<p>ESA: No exploration activities within 100m of any river</p> <p>ESA: No exploration activities within 100m of monitoring boreholes</p> <p>ESA: No exploration activities within 100m of pipelines/other infrastructure without RUL’s consent</p> <p>ESA: Drilling fluids listed by proponent are water pollutants – ESA advises alternative non-polluting drilling fluids are used to minimise impact on ground and surface water. However RUL team did not review the MSDS sheets for relevance or correctness.</p>

RUL Area of Concern		Agreed Actions	Pennywort Proposal (Nov 2022)	ESA (Feb 2023)
				<p>EMP: Hydrocarbons to be contained on site and disposed offsite; Spill prevention, control, and countermeasure plan to avoid soil and groundwater contamination.</p> <p>ESA: Ablution waste water to be contained on site and disposed offsite</p> <p>EMP: Provide emergency plan for major/minor spills at the exploration sites and during transportation (will consider impact on groundwater, soil and surface water)</p>
<p>3. <u>Air Quality and Radiation Exposure</u>: RUL is concerned that Pennywort workers involved with prospecting, exploration and future mining activities would be impacted by TSF dust-fallout and radiation exposure emanating from the existing RUL operations.</p>	<p><u>1</u></p>	<p><u>PennyWort and EDS</u>: The EMP will make provision for air quality and radiation exposure risks – although mobilised from RUL TSF.</p>	<p>There is no mention of controls that will be implemented to mitigate risks of TSF dust-fallout and radiation exposure during exploration activities.</p>	<p>EMP: Manage dust and radiation from own exploration activities:</p> <ul style="list-style-type: none"> - Vehicle speed regulation and dust suppression on roads and exploration sites to avoid dust generation - Dust masks, eye protective glasses, other respiratory PPE around drilling areas - Maintain excavation equipment to reduce drilling and excavation dust generation/harmful gas emissions. <i>It is not clear how maintain excavation equipment would manage drilling dust/emissions</i> - Personnel radiation monitoring

RUL Area of Concern	Agreed Actions		Pennywort Proposal (Nov 2022)	ESA (Feb 2023)
				<p>ESA: Manage dust and radiation from RUL TSF</p> <ul style="list-style-type: none"> - PPE to be provided <p>Provide emergency plan for major/minor spills at the exploration sites and during transportation (will consider impact on air)</p>

RUL ResponseTSF Stability:

Although the exploration activities will be undertaken at a distance of at least 1km from the TSF and is therefore not expected to pose a stability risk to the TSF, the impact on TSF stability from blasting and mining activities which may follow from exploration activities remains a major concern. Of major concern is the fine materials that underlie CDIII and Siltrap and specifically along their western perimeters. These fine materials will likely undergo a pore pressure increase as a result of blasts which will then dissipate with time. Mining activities will affect pore pressures by a progressive build-up of pore pressure over a series of blast cycles that could lead to slope instability, and potentially a dam break into the new mine workings. Although the ESA indicates that the proponent will be required to conduct a geotechnical assessment as part of their Environmental Impact Assessment for a mining licence application, RUL needs this commitment to be staged back, and be part of the current Environmental Clearance Certificate application process for EPL7011 and be included in the ESA. To that effect, RUL requires an independent body to review the said geotechnical assessment and/or may request for a geotechnical assessment to be conducted by a resource appointed by RUL.

Groundwater Quality:

RUL acknowledges the controls that will be put in place to avoid contamination of groundwater systems, and to avoid damaging existing RUL infrastructure. RUL does not monitor Total Petroleum Hydrocarbons) in that area as this was never a risks, so there is no baseline data for this risk. Hence, should oil/grease spills occur at level that would cause contamination – there is no baseline to verify that drilling activities by the proponent was the cause of the contamination. RUL therefore suggest that the proponent conducts a baseline assessment for their identified impacts before exploration activities commence, against which their monitoring program will be established.

Air Quality and Radiation Exposure:

There is a risk that the dust fall-out plumes west of the TSF will be remobilised by the exploration activities extending the impact beyond the current exposed area. Apart from the dust generated from exploration activities, remobilising of these TSF fall-out plumes requires proper dust management across all movement pathways for all activities on the EPL.

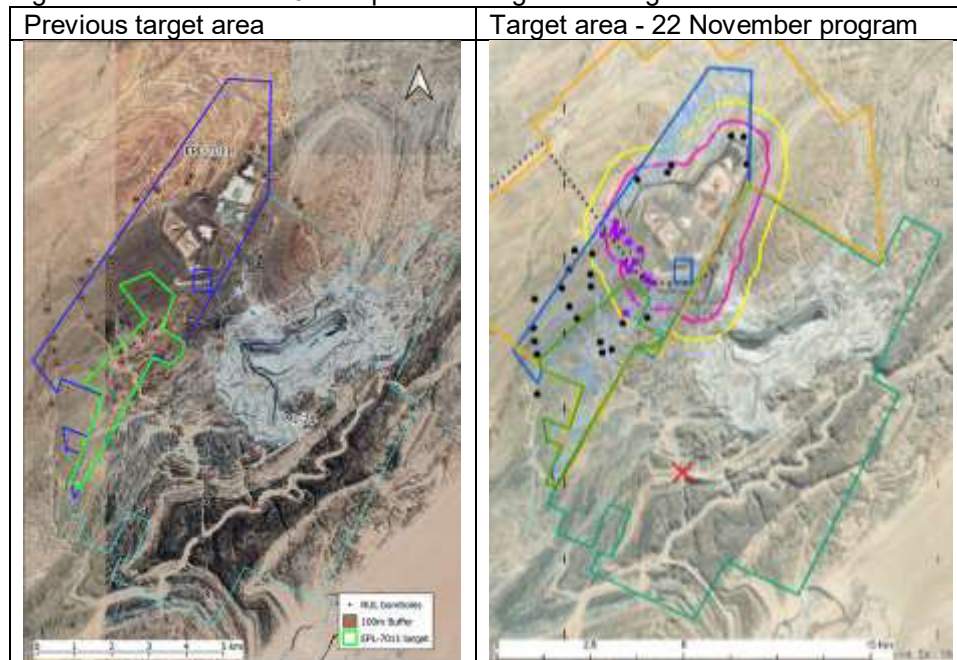
From	Angela Kapapilo
Department	Mining Operations
To	M Tjipita – GM Operations
CC	T Murasiki; R Khoeseb; S Gaeseb; K Abraham
Reference	Pennywort Investments Limited Proposed Program for EPL7011
Date	7 December 2022
Number of pages	3

Review of the Pennywort Investments Limited Proposed Program for EPL7011

Rössing Uranium Limited (RUL) engaged Pennywort Investments (Pty) Ltd (Pennywort) and Excel Dynamic Solutions (Pty) Ltd (EDS) during an onsite meeting on 17 October 2022, to ensure that RUL concerns about the potential risks of overlaps between RUL AWAs and planned prospecting and exploration activities and later mining activities within EPL7011 are adequately addressed in the final ESA report for the EPL7011 ECC application by Pennywort. During the meeting Pennywort and EDS agreed to several actions, following which Pennywort provided a proposed exploration program to RUL on 22 November 2022. The document lists annual prospecting and exploration activities covering the 2022 to 2025 period and depicts a wider exploration target area in comparison to previous communication (Figure 1).

The document was reviewed to assess the extent to which the RUL concerns and agreed actions were addressed in their exploration program.

Figure 1: Revised EPL7011 exploration target area in green



1. Tailings Storage Facility (TSF) Stability

RUL is concerned that blasting activities in the vicinity of the TSF during potential future mining activities would likely impact TSF stability and have requested a list of planned activities so that the RUL Engineer of Records could assess the potential impacts of these activities on the TSF.

Agreed Action		Pennywort Proposal
1	<u>PennyWort and EDS</u> : provide RUL with a list of activities planned for the EPL target area – this list to be included in the ESA;	Only list of prospecting and exploration activities provided.
2	<u>PennyWort and EDS</u> : will assign risk ratings per activity and review ratings with RUL. Also provide a risk scheme so RUL understand your envisaged work.	Not provided

The listed prospecting and exploration activities are likely to have a negative impact on TSF stability. Although the new exploration target area appears to depict a change near the TSF, no mention is made of specific activities planned near the TSF in the north-west. There is no mention of the impacts of blasting from future mining operations.

2. Groundwater Quality

RUL is concerned that prospecting and exploration activities could damage the RUL borehole network and supporting infrastructure and has requested that controls be put in place to prevent such damage.

Agreed Action		Pennywort Proposal
1	<u>PennyWort and EDS</u> : The Environmental Management Plan (EMP) will include controls to avoid damage to RUL infrastructure.	There is mention that the RUL no go areas will be avoided during the prospecting an exploration activities.

There is no mention of specific steps that will be taken to ensure the planned activities will avoid damaging the existing RUL water infrastructure. The reconnaissance field work, mapping, ground geophysical surveys, sampling, and drilling activities will most likely overlap with the existing pipelines. Drilling activities usually take up large surface areas at each drillhole, so more specifics are required, for example, on how drillhole locations and related activities, and supporting infrastructure will be planned to avoid encroachment on RUL boreholes and pipelines.

3. Air Quality and Radiation Exposure

RUL is concerned that Pennywort workers involved with prospecting, exploration and future mining activities would be impacted by TSF dust-fallout and radiation exposure emanating from the existing RUL operations. A request has been made that Pennywort implements controls to minimise impacts on their workers.

Agreed Action		Pennywort Proposal
1	<u>PennyWort and EDS</u> : The EMP will make provision for air quality and radiation exposure risks – although mobilised from RUL TSF.	There is no mention of controls that will be implemented to mitigate risks of TSF dust-fallout and radiation exposure during exploration activities.

Conclusion

The Pennywort exploration program only provides a list of annual prospecting and exploration activities covering the 2022 to 2025 period. The concerns RUL raised about

the TSF stability, groundwater infrastructure, air quality and radiation exposure and agreed actions related to these concerns are not mentioned in the exploration program, so it is an insufficient response to the engagements with RUL. In the document, Pennywort only commits to avoiding RUL “no go areas” during the planned 2023-2025 activities. Pennywort and EDS needs to provide RUL with the revised ESA report to assess whether the concerns raised have been addressed in their ECC application.

Rossing remain concerned that all roads lead to drilling, if the exploration goes ahead, which means that the next step is bulk sampling, which means blasting next to the TSF. There is also no mention of mitigatory measures to avoid damaging the pipe and pump network during said reconnaissance and drilling stages in the plan.