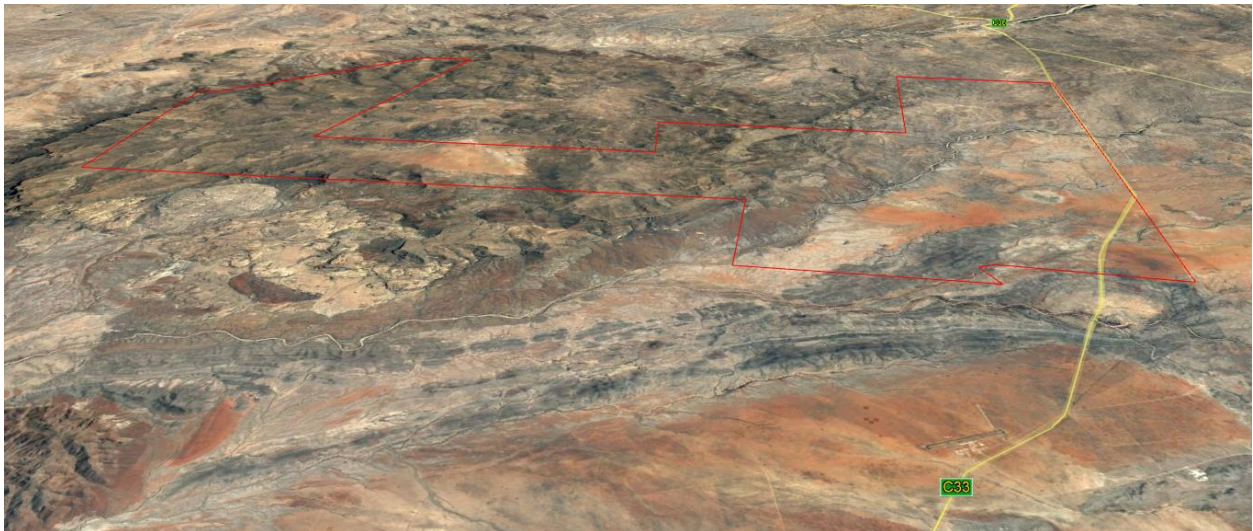


SCOPING REPORT WITH ASSESSMENT FOR ERONGO GOLD PROSPECTING WITHIN EPL 6440, ERONGO REGION



February 2020

Prepared by:
Philip Hooks

STAKEHOLDER CONSULTATION

Consultation with the public forms an integral component of an EIA investigation and enables Interested and affected parties (IAPs) e.g. neighbouring landowners, local authorities, environmental groups, civic associations and communities, to comment on the potential environmental impacts associated with the proposed development and to identify additional issues, which they feel, should be addressed in the EIA.

This background information document (BID) (See **Appendix B to the EIA document**) provided IAPs with the opportunity to register and engage in the public participation process. Through registering they have the opportunity to:

- Provide the EIA coordinator with additional information which should be taken into account in the assessment of impacts and during decision-making;
- Attend meetings and obtain information about the proposed project;
- Share any comments, issues or concerns related to the proposed exploration activities;
- Review and comment on the draft report and EMP and findings from the EIA process.

The public participation notices for the EIA and the public meetings were advertised over two consecutive weeks in two national papers, namely, New Era and Die Republikein. Proofs of the adverts are found in **Appendix B**. Table 1 lists the persons who attended the public meetings.

Table 1. Public meeting attendees

Name	Role / Organisation / Company
Kai-Uwe Denker	Chairperson – Erongo Mountain Rhino Sanctuary Trust (EMRST)
Saima Shihepo	SHE officer – Karibib Town Council
S. van Wyk	Owner – Farm Koedoeberg
M. van Wyk	Owner – Farm Koedoeberg
Bianca Foelscher	Resident - Karibib
Aloisius Uugwanga	Participant
Hilia Haikali	Participant
Johan Nel	Contractor
Joos Fourie	Electrical Contractor

Eugene La Grange	Contractor
Munjonganda Kamuaruuma	Ministry of Environment & Tourism - Omaruru
Jens Roland	Attorney – (EMRST)
Ferdinand Herzog	Trustee - EMRST
Milton Hochobeb	Participant
Dr. Rolf Lübbe	Trustee - EMRST
Christian Traupe	Chairperson – Omaruru Farmers Association
Flip van Rhyen	Owner – Farm Nieuwoudt 186
Daniel Rusberg	Representative – Farm Erongo East
Interested & Affected Party	Co-owner Farm Hoogenoeg / Trustee EMRST

During the public meetings a number questions, comments and objections were received. Some responses were provided. The comments and responses are contained in **Appendix B**. A summary of the interactions is provided below.

The first public meeting took place in Karibib. The difference between exploration and mining was clarified. The SHE officer from Karibib asked what would be the life of mine expectancy. No details were available to answer this. The Chairperson of the Erongo Mountain Rhino Sanctuary Trust (EMRST) submitted a written objection on behalf of the Trust. This letter is found in **Appendix B**. A local resident raised concerns about the impacts of mining on the health of residents wondering if it was safe to live near mines that extract Lithium. It was made clear that the current activities were explorative in nature and that Gold was the mineral that was being sought in particular and not Lithium. During the first presentation in Karibib it was stated that the focus of the exploration would be on the plains to the east of the Erongo Mountains. Local contractors were interested in opportunities to provide their services to the drilling industry. Other local residents who attended were interested in job opportunities.

The second public meeting was held in Omaruru. A farming representative asked about the number of quarries or holes that would be created and raised concerns about animal safety. He also asked about the safety of the chemicals in relation to the groundwater. The nature of exploration was re-iterated and that mining would be the subject of another EIA process.

Another interested and affected party asked whether the mining, should it ever take place, would be isolated or consolidated in one large area. The concern raised was the impact that a large mining operation would have a great impact on the tourism and commercial sustainability of the farms. If the mine was to operate for many years, all the business investment would be lost due to the impact on the game farm or lodge. This potential eventuality creates such uncertainty about the future of the farms and their viability to sustain the business activities. It was difficult to see the two opposing activities being mutually benefitting. The farming would be affected negatively undoubtedly. This I&AP and other trustees of the EMRST were opposed to the exploration as it would impact the Trust negatively from a biodiversity perspective not to speak of the business aspect of the farms. Information about the biodiversity, social and economic nature of the farms and EMRST was requested for use in the scoping EIA report.

Table 2 below provides a summary of the responses from the various stakeholders and IAPs. All the IAPs were given 30 days to comment on the BID and a further 30 days for public review of the Draft EIA Report and Draft EMP. There was an overwhelming opposition from farmers who were trustees of the EMRST. They provided details about the biodiversity on their farms. The trustees also provided information about the investments made and the personnel employed. Non EMRST trustees and farmers outside the EMRST boundary provided both letters of acceptance and objection to the exploration. One hunting lodge stated that they had had bad experience with mining on another farm.

Table 2: Stakeholders, IAPs who received BIDs and correspondence, and who corresponded by email with comments during the scoping phase of the EIA. (summarised comments included)

Name	Capacity / Status	Company / Organisation / Farm	Comments
Wensel Badenhorst	Manager	Omapyu Investments (Pty) Ltd; Farms Kanona West & Sonnenschein (Kanona Hunting	Contacted farm manager by phone; Farm manager emailed an objection to the planned project on behalf of the company. A generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and

		& Safari Ranch)	<p>palaeontological values were highlighted.</p> <p>“We are 100% a hunting and guest farm and cannot allow it that there will be prospectors busy on the farm whilst hunting. On our other farm we have mining going on and we can see which negative impact it has on the game environment and for our farming and hunting business. Half of the farm cannot be utilised by us because of the mining. Therefore we will not allow any mining and prospecting on Kanona West.”</p>
Office of the President	Permanent Secretary	Omapyu Investments (Pty) Ltd; Farms Kanona West & Sonnenschein (Kanona Hunting & Safari Ranch)	BID and notice sent to the office of the President.
S. van Wyk	Owner (Not an EMRST trustee)	Koedoeberg 169	Attended public meeting and received presentation, notice and BID by email
Anneli Wamback	Owner (EMRST trustee)	Farm Oubokberg (Koedoeberg 169 portion 2)	<p>Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p>
Interested & affected party	Owner (EMRST trustee)	Wild Erongo / Farm Hooggenoeg 170	<p>Attended meeting; BID issued; Objection letter received.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p> <p>“The farm Hooggenoeg is dedicated to preserve high value wildlife habitat and has been purchased to be</p>

			<p>recovered and attached to the EMRST area.</p> <p>Since purchase a few years ago every effort had been undertaken restless to clean the farm from all livestock and fences, rubbish disposals, dangerous scrap and obstacles to create safe and natural habitat. Activities/disturbances had been reduced to necessary minimums and restricted to intensive field controls, snare removals, anti-poaching, mainting water points. This farm shall be kept close to a “preservation” status. Eco-friendly tourism and wildlife/flora research activities are focused for later stage. The farm is member of the EMRST and is bound to its constitution as well as to MET’s MOU. Farm Hooggenoeg agrees and refers to all stated in objection letter of EMRST.</p> <p>My deepest concern is herewith expressed in regards of any man made disturbances, noises, water/soil/air pollution, any destroying of environment, habitat and wildlife by man, machines, chemicals, toxical wastes.</p> <p>Any prospecting activities will already start destroying a long-term aim and vision of a large embracing conservation area and thus destroy future plans of tourism business, fundraising projects and valuable nature research themes all based on this unique inselberg complex.</p> <p>More detailed concerns of confidential content not meant for publication will brought to consideration at court.”</p>
<p>Andreas Fellner</p>	<p>Owner</p>	<p>Farm Otjohotozu 85 Guestfarm (east of Farm Eileen)</p>	<p>Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p>

			“Prospecting or any mining activity will destroy the attraction of my environment and with it my future in this wonderful heritage. We think on tomorrow and the future generation to conserve and inherit it to them in untouched condition. Please keep out with respect to our nature!”
Anika and Eckart Waldschmidt	Owners	Farm Kanona Ost	Contacted the farmers by phone; they requested BID and this was sent to them; no comments received.
Birgit Stiftel and Helmut Metzger	Owners (EMRST trustee)	Farm Ovimbarra and Triangle	<p>Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p>
Charles Cleghorn	Consultant	Consultancy	Request BID after seeing advert in the newspaper asked to be kept posted as progress occur.
Christian Traupe	Chairperson	Omaruru Boere vereniging (Farmers association)	Attended public meeting; presentation, notice and BID was sent by email.
Interested and affected party	Owner (EMRST trustee)	Farm Erongo West 83	<p>Public meeting was attended; Presentation, notice and BID was sent; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p> <p>The objection listed the tourism aspects and the inclusion within the EMRST with the view to conserve this beautiful environment for future sustainable use. “All</p>

			that will be finished, when the nature is destroyed by the activities of prospecting and mining.” The owner opposes the project in no uncertain terms.
Interested and affected party	Owner (EMRST trustee)	Farm Omandumba Ost 133 Portion 1	<p>Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p> <p>“Over the last two decades, the people in this area have dedicated their lives and livelihood to create a sustainable income through tourism and conservation for conservation. This area is one of a kind! Should mining go ahead the sustainable use of the area and conservation would be put to an end. One cannot rehabilitate this unique environment.”</p>
Daniel Rusberg	Representative	Farm Erongo Ost	Attended the public meeting and received a BID via email; Requested updates on all new developments.
Agostinho Victor	Owner	Erongo Ost	Requested BID; Presentation, notice and BID was sent. Awaiting feedback
Veno Mukona Tjiseua	Agricultural Technician	MAWF – Omaruru Agriculture	Contact by phone; sent the notice, BID and presentation to his email address.
Fidi alpers	Resident	NGO	Met in Omaruru and discussed project briefly; he requested BID; Presentation, notice and BID was sent by email.
Gravel Travel Booking	no information	no information	Requested information to register enquiry but no reply was received.

Hafeni Hiveluah	Geologist	no information	Read notice in the newspaper; requested BID and this was sent by email.
Hubert Herzog	Owner (EMRST trustee)	Herzog Hunting; Otjompau West 134; Ombuwa 164 (a portion of original Eileen 164)	<p>Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p> <p>“Mining, prospecting etc. will destroy a life’s work, the future of this wonderful nature and the future of every family. I will fight against with all legal possibilities! I made investment and and donations in millions to build up this wilderness area. I will fight like a lion!”</p> <p>“No ways for any person to enter!”</p>
Gudrun Hacker	Owner (EMRST trustee)	Farm Otjompau Nord 125	<p>Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p>
Ferdinand Herzog	Owner (EMRST trustee)	Farm Omandumba Ost 133	<p>Public meeting was attended; Presentation, notice and BID was sent; Objection against planned project were received by mail.</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p>
Trevor Petersen	Owner	Kranzberg Lavender Fields	Presentation, notice and BID was sent to the farmer owner by an EMRST representative; Objection against

		58	<p>planned project were received by mail</p> <p>Generic letter received where conservation values, species diversity, social values, economic value and archaeological, aesthetic, cultural, historical and palaeontological values were highlighted.</p>
Chief Manase Zeraeua	Beneficiary	Resettlement Farm Kamombonde West 80	Received contact details from Ministry of Land Reform; called the beneficiaries and explained the project over the phone; No concerns were raised and the company was invited to call them should they want to start prospecting and make detailed arrangements.
Mr. Kleopas Tjongarero	Beneficiary	Resettlement Farm Kamombonde West 80	Received contact details from Ministry of Land Reform; called the beneficiaries and explained the project over the phone; In an email I received the following objections: 'I hereby wish to state that I am totally against any form of prospecting within the Erongo Mountain Area or within the EMRST area....Any prospecting or mining would have a severe impact on the natural behaviour of game and would have a negative impact on Eco Tourism and threaten our livelihood. It would drastically affect the safety and well-being of our livestock and the environment as well as the business of farm owners comprising the EMRST. Mining, prospecting etc. will destroy a life's work, the future of this wonderful nature and the future of every family. Over the last two decades, the people in this area have dedicated their lives and livelihood to create a sustainable income through tourism and conservation for conservation. This area is one of a kind! Should mining go ahead the sustainable of the area and conservation would be put to an end. One cannot rehabilitate this unique environment. Prospecting or any mining activity will destroy the attraction of our environment and with it my future in this wonderful heritage. I think on tomorrow and the future generation to conserve and inherit it to them in untouched condition. Please keep out

			with respect to our nature! My deepest concern is herewith expressed in regards of any man made disturbances, noises, water/soil/air pollution, any destroying of environment, habitat and wildlife by man, machines, chemicals, toxically wastes.’
Lelley Mulike	Erongo Regional Administrator	Ministry of Land Reform	Presentation, notice and BID was sent by email; no comments were received.
Jens Roland	Attorney for EMRST	Fisher, Quarmby and Pfeifer Legal Practitioners and Conveyancers	Attended the public meeting; received the notice, BID and presentation; provided valuable information regarding the EMRST; sent an objection letter on behalf of EMRST ; “Any prospecting and mining activity would drastically affect the safety and well-being of the rhino population, as well as the business of farm owners comprising the EMRST. Our instructions are therefore to inform you as well as the relevant Ministries that our client objects to any and all prospecting activities on land that forms part of the EMRST”
Kai-Uwe Denker	Owner & Executive Chairperson of EMRST	Farm Brabant	Attended the public meeting; issued the legal letter during the meeting and stated that the EMRST will not allow entry to the EMRST area due to its sensitive biodiversity; received a BID at the meeting and by email; sent an objection letter separately referring to the biodiversity highlights of the area and in conclusion stated “that all this is threatened by prospecting and mining operations in our area and therefore object to the proposed activities of Gecko Gold Mining (Pty) Ltd within the designated area of EPL6440.”
Karen & Walter Schmidt	Owners	Farm Ombu 130	Presentation, notice and BID was sent to the farmer owner by an EMRST representative; an objection letter was received. “We hereby wish to state that we are totally against any

			form of prospecting within the Erongo Mountain Area or within the EMRST area....Any prospecting or mining would have a severe impact on the natural behaviour of game and would have a negative impact on Eco Tourism and threaten our livelihood”
Laurica Afrikaner	Hydrologist	MAWF (Water Affairs)	A letter and BID was sent to the Permanent Secretary regarding the project; A regional representative responded; A letter was received from the Permanent Secretary which provided comments and guidelines for the prospecting activities.
Natanael Amadhila	Regional Chief Forester	MAWF (Forestry Directorate)	The notice, BID and presentation was forwarded by email
Eckhardt Waldschmidt	Owner	Farm Kanona Ost 81	Letter received by email objecting to any exploration or mining activities on his farm. The BID and presentation were forwarded by email. The risk to the egg laying hen rearing station is considered too great to have any industrial activities on his farm. Additionally he feels that the farm’s game and cattle would also be seriously affected.

Most farmers objected to the project due to the Erongo Mountains Rhino Sanctuary Trust (EMRST) area that is highly sensitive from a biodiversity and ecological perspective. Additionally, they state that the proposed activities will affect the economic, aesthetic and archaeological value of their farms. The noise from the envisaged project is expected to hinder the hunting activities.

Additional comments and concerns were received during the review period of the Draft EIA Report. A legal firm (Nakamhela Attorneys) representing the EMRST members provided numerous constructive comments. A number of these comments have been considered and incorporated into the report and have been referenced appropriately. Some corrections have been made to the assessment as a result of this input. The full discourse from the legal firm can be found in **Appendix B**.

A response to the Draft EIA received from the legal firm is stated here. ‘There is no conflict between hunting and the stated conservation mandate of the EMRST. The national policy on game utilization in protected areas and other State Land (in February 2015) states that game hunting can be undertaken provided it remains sustainable and does not lead to conflict between different forms of utilisation. The policy provides guidelines for utilisation of game through harvesting of game for meat for various purposes, trophy hunting and removal of live game. Additionally, sustainable trophy hunting can raise income for protected area management and can provide economic incentives to conserve wildlife. If carried out sustainably, ethically and in a planned manner, trophy hunting need not compromise the conservation and non-consumptive tourism objectives of protected areas.’ (Nakamhela, 2018) This answers any concern that hunting is in any way in conflict with the principles of conservation.

In conclusion, and quite importantly, the members of the EMRST have demanded that the Environmental Commissioner appoint an independent external reviewer for the EIA (Nakemhela, 2018).

The members of the EMRST who sent in submissions stated that some information given is confidential and as such should not all be included in the public documents of the EIA report. This information pertains to particular farms and any sharing of such information may compromise the conservation efforts of the trust. This information may be used by the company in planning and avoiding particularly sensitive areas should environmental clearance be granted.

Mrs Biana Foelscher, a resident of Karibib who attended the public meeting provided a lengthy submission in writing as summarised below:

- Concern that multiple mineral groups are held under one licence providing rights to explore all such minerals, leads to a monopolising of available minerals in Namibia by any licence holder. It should be made obvious from the start which minerals are being targeted with a view to potential mining activities.
- All stakeholders should be engaged and both nearby towns should be considered in the development of the project.
- The promise of employment and investment into Namibia should not be used to promote and motivate for a positive record of decision without some assurance that any future changes in the market forces will not result in the premature retrenchment of employees.

The sustainable employment promised must be a commitment that would not easily be reversed when investors feel they are not making sufficient profits.

- All government ministries should be included in the discussions and decision making process of the project development.
- With regards to project motivation, it is concerning that it appears the project development of multiple mineral exploration prospects excludes smaller individual entrepreneurs from gaining access to the area to explore other minerals.
- To avoid the exploitation of Namibia's resources for the benefit of non-Namibians how does Gecko support the more inclusive approach to less fortunate Namibian entrepreneurs.
- Will the results of the electromagnetic survey be accessible by stakeholders and interested and affected parties or will the results remain confidential and allow Gecko Namibia (Pty) Ltd to be the sole beneficiary of the potential wealth?
- The local authorities should be engaged with respect to the potential development so as to plan for the potential influx of people seeking jobs with the company.
- A concern is raised with regards to the inclusion of the registered conservancy that overlaps the EPL6440 in the west. What is their role and how will they be affected.
- The exposure of the project was biased as it was advertised in supposedly biased newspapers.
- The longstanding and sustainable economic contribution of the tourism facilities, on the farms within the EPL, towards the country's GDP could be at risk if the exploration project goes ahead. The exploration project needs to prove itself in terms of its contributions to the GDP.
- Will it not be possible for the opposing parties (i.e. EMRST & Gecko Gold Mining) to establish a practical master plan, thereby effectively demonstrating an achievable harmony between two very contrasting industrial sectors?

APPENDIX B: PUBLIC PARTICIPATION DOCUMENTS

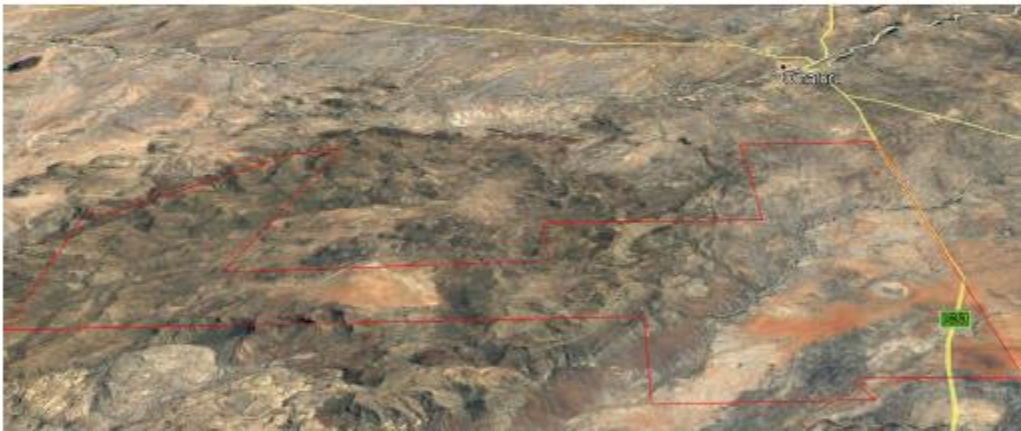
2017.10.31

Erongo Gold Project - BID

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BACKGROUND INFORMATION DOCUMENT

ENVIRONMENTAL IMPACT ASSESSMENT FOR ERONGO GOLD
PROSPECTING WITHIN EPL 6440, ERONGO REGION



Prepared by Philip Hooks

October 2017

2017.10.31

Erongo Gold Project - BID

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1 INTRODUCTION

The Erongo Gold Prospecting Project (referred to as Erongo Gold) is owned by Gecko Gold Mining (Pty) Ltd, a subsidiary of Gecko Exploration (Pty) Ltd. EPL 6440 is granted to Gecko Gold Mining (Pty) Ltd. and Figure 1 below renders a map of the general location of the EPL in the Erongo Region of Namibia.

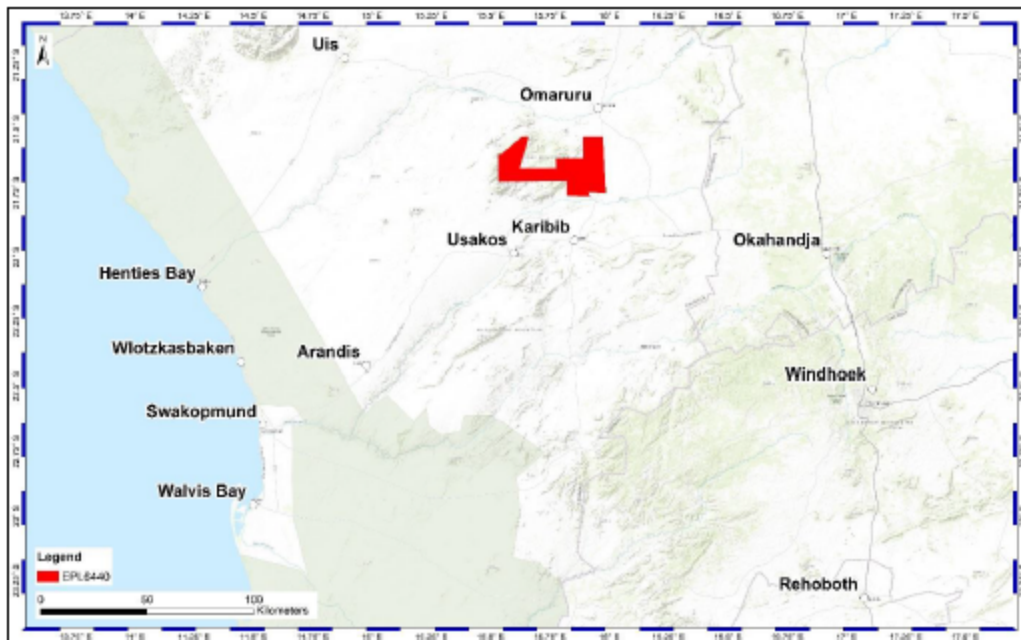


Figure 1. Location of EPL6440 within the Erongo Region

The EIA is based on the requirements of the Namibian Environmental Management Act (Act. No. 7 of 2007), as well as supporting policies and guidelines, which include the environmental regulations of February 2012. An Environmental Clearance Certificate for mineral exploration activities is required and thus an Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) needs to be submitted to the Ministry of Environment and Tourism (MET) of Namibia for approval.

A risk assessment will be undertaken to determine the potential impacts of the project on the environment. The EIA Report and EMP will enable stakeholders to make informed judgements regarding the exploration activities from an environmental perspective. The environment is defined in the Environmental Assessment Policy and Environmental Management Act as "land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in sub-paragraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, palaeontological or social values".

This background information document (BID) provides I&APs with the opportunity to register and engage in the public participation process. Through registering you have the opportunity to:

- Provide the EIA coordinator with additional information which should be taken into account in the assessment of impacts and during decision-making;
- Attend meetings and obtain information about the proposed project;
- Share any comments, issues or concerns related to the proposed exploration activities;
- Review and comment on the report and findings from the EIA process.

2 BACKGROUND INFORMATION

The objective of the Gecko group of companies is to develop and operate projects in the mineral and chemical industry and also in providing services to the mining industry of Namibia through exploration drilling, chemical analyses, research and development metallurgical test work, civil engineering and construction, process design and plant construction as well as contract mining (<http://www.gecko.na>).

Erongo Gold fulfils aspects of the group's interests through the exploration for gold within EPL6440. The nearest town is Omaruru. Figure 2 below shows the location of the exploration project in relation to the Omaruru townlands, private and state owned farms and the ≠/Gaingu conservancy. A freehold conservancy exists over the Erongo Mountains and a number of the farms are members of that conservancy. Figures 2 and 3 render maps of the EPL and give the licence's corner coordinates.

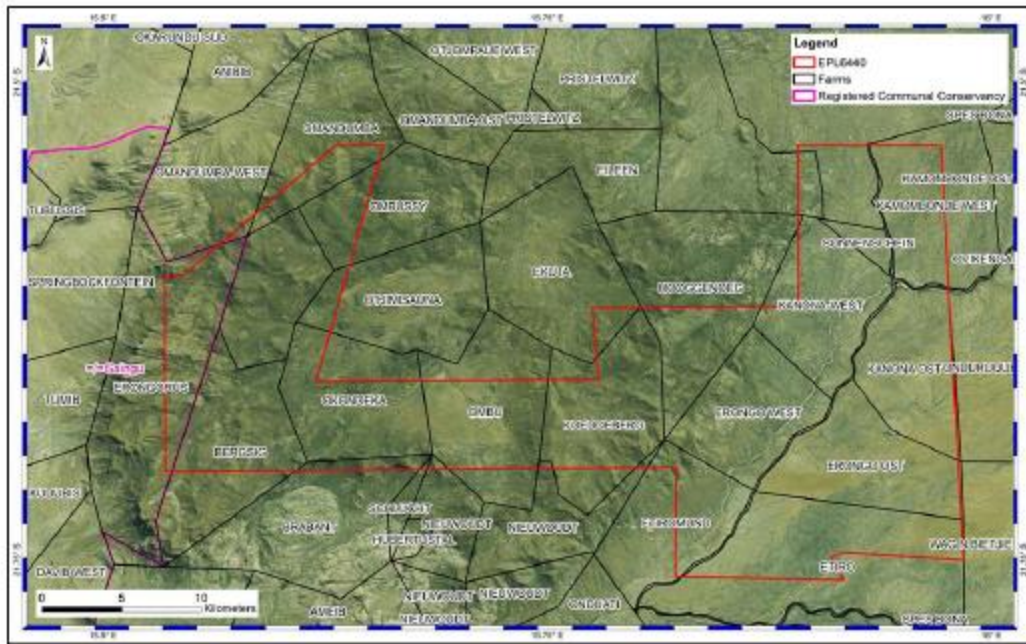


Figure 2. Farms and Conservancy within EPL6440

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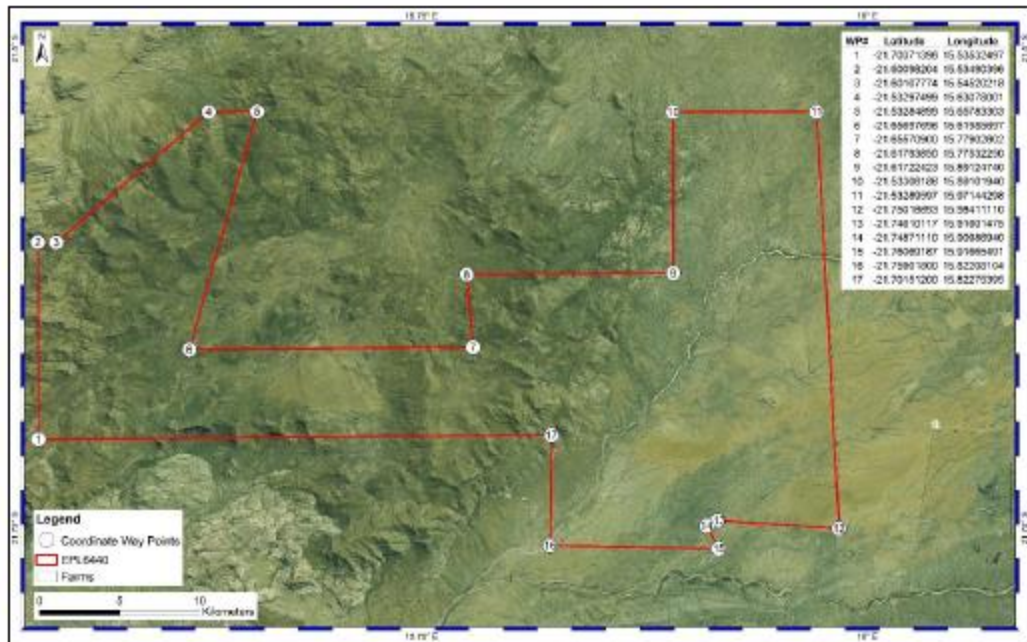


Figure 3. EPL6440 corner coordinates

3 PROJECT MOTIVATION

The main proposed mineral to be explored is gold. However, in addition to this, base and rare metals, industrial minerals, precious metals and precious stones may also be considered. This project has the potential to contribute to Namibia's economy.

Table 1 lists the direct and indirect benefits that will arise should the mine be given environmental clearance and activities start up.

Table 1. Project benefits

Project	Direct Benefits	Indirect Benefits
Erongo Gold	<ul style="list-style-type: none"> ➤ Continued employment opportunities ➤ Direct capital investment in order to determine and define mineral resources in Namibia ➤ Stimulation of economic development (e.g. ongoing supply of materials and services to the exploration and drilling industry) ➤ Continuing skills development 	<ul style="list-style-type: none"> ➤ Expansion of exploration and drilling industry in the region and country. ➤ Inducement of additional investments. ➤ Maintenance of new long-term employment opportunities in sectors relying on exploration and drilling activities.

4 SCOPE OF THE STUDY

The scope of the EIAs is to determine the potential environmental impacts emanating from the proposed activities. Relevant environmental data will be compiled by making use of primary data through site visits and direct consultation with stakeholders together with secondary data from desk-top work. Existing specialist fauna and flora studies, if available, will be used to assess the impacts on biodiversity.

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Potential environmental impacts and associated social impacts will be identified and addressed in the report. The environmental assessment will be conducted to comply with Namibia's Environmental Management Act, the requirements of Local Authorities and all other legal requirements applicable to the project and the country.

5 PROJECT DESCRIPTION

From the visual appraisal of the available information-aerial photographs and geological maps of the area, it is clear that mineralization potential for the commodities covered exists within the area of EPL6440. Gecko plans to conduct a staged exploration approach. The application for environmental clearance is based on this description of the exploration phases. Interested and affected parties are requested to provide input into the EIA process.

STAGED EXPLORATION APPROACH

Exploration follows three phases as described below. Firstly, there is a prospecting phase, then a drilling phase and lastly a pitting, trenching, bulk sampling and trial mining phase.

PROSPECTING

The aerial data will need to be verified through field work. Lithological mapping, sampling and analysis will be necessary. The results from initial lithological mapping may need further confirmation by means of small exploration pits.

Prospecting is in general a low intensity activity. Specifically it constitutes the following:

- Geologists and geo-technicians walking through the area with rock hammer and GPS examining and mapping the outcropped lithology.
- Collecting rock and sand samples by hand for either mineral or chemical analysis.
- Possible follow up pitting.

For the first 12 months, prospecting will be done by:

- Data collection and compilation of all available information into GIS digital format and interpretation of data (2 months)
- Mapping of the area & prospect pitting (2 months)
- Analysis of samples (4 months)
- Compilation of data and preliminary viability calculations (5 months)

For the remaining 24 months of the initial license tenement prospecting will be done by the following activities:

- The identification of potential mineral occurrences of base and rare metals, precious metals through remote sensing techniques. Gecko plans to contract an airborne electromagnetic survey over EPL 6440.
- The identification of potential secondary mineral resources of economic interest. Besides the initial mineralisation model which is being pursued in the endeavour to consolidate and expand prospecting area, the area will also be looked at in the light of secondary mineralisation as well as for different other types of mineral deposits.

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EXPLORATION DRILLING, SAMPLE EXTRACTION AND ANALYSIS

The most commonly used drilling techniques are Reverse Circulation Drilling (RC) or Diamond Drilling. Both methods are applied in exploration, resource evaluation and subsequently in defining an ore reserve.

Exploration Diamond Drilling differs from other geological drilling in that a solid core is extracted from depth, for examination on the surface. The key technology of the diamond drill is the actual diamond bit itself. It is composed of industrial diamonds set into a soft metallic matrix. The drill produces a "core" which is logged, photographed and split longitudinally. Half of the split core is assayed while the other half is permanently stored for future use and re-assayed if necessary.

RC Drilling uses a pneumatic hammer which drives a rotating tungsten-steel bit. The technique produces an uncontaminated large volume sample which is comprised of rock chips. It is relatively quick and cheap compared with Diamond Drilling

The target areas within the EIA which have been identified during the prospecting phase will then undergo exploration drilling to obtain undisturbed samples of the lithology which are associated with the specific minerals present. A number of consecutive drilling campaigns on increasingly closer-spaced exploration grids might be conducted. Drilling is initially done with the diamond coring technique. Once the type of ore body is understood, emphasis then lies on obtaining more closed-spaced samples for gaining confidence and information on the statistical variance. For this latter process, RC Drilling is the preferred technique.

If there are signs of specific minerals presence, prospecting activities progress to more detailed work program. Drilling is then required to go deeper. Larger samples are geologically logged and analysed in a laboratory.

The establishment of a drilling camp at an approved site within the EPL may be necessary. Existing gravel access roads will be used as far as possible. Solid waste will be removed off site and taken to Omaruru's approved landfill site. Ablution facilities will use chemical toilets and or sealed septic tanks and the sewerage taken to the Omaruru sewerage plant periodically. No power supply infrastructure to the site is planned. Diesel power generation will be used. Temporary storage areas for drilling materials, machines etc. will be necessary at the camp. Security will be supplied on a 24 hour basis at the exploration camp. A fence surrounding the camp will be constructed to ensure people and domestic animals are not put at risk. These support services and facilities will be removed at the end of the 3rd phase of the exploration.

Clearing of vegetation at the planned drill sites may be necessary. Permits from the forestry directorate will be required for this purpose. Where necessary, stockpiling of top soil for rehabilitation at a later stage will be undertaken. Necessary landscaping of exploration areas will be undertaken upon completion of each phase of exploration.

PITTING, TRENCHING, BULK SAMPLING AND TRIAL MINING

In the advanced stage of exploration activities, larger amounts of sample material is required for the performing processing trials and metallurgical testing programs. The ground conditions and geotechnical parameters would then be established with a view to extract the mineral from the ore reserve.

Bulk sampling for analytical processing will only be carried out if the material obtained during drilling is insufficient. Pits may be dug / excavated to a depth of 4m and 5 cubic meters of samples are taken. The location of the pits will depend on the drilling results.

2017.10.31

Erongo Gold Project - BID

GGM

6 POSSIBLE ENVIRONMENTAL, SOCIAL AND CULTURAL IMPACTS OF THE PROJECT

Potential impacts that can arise from the proposed exploration project include but are not limited to:

- Dust Pollution
- Noise impacts
- Visual impacts
- Impact on archaeological and cultural features
- Impacts on ground and surface water quality
- Loss of biodiversity
- Alteration of habitat and landscape
- Increased traffic volumes on public roads
- Potential employment opportunities (temporary)
- Stimulation of local economy through service supply to drilling program

7 PUBLIC PARTICIPATION

The Environmental Impact Assessment process involves interaction with individuals and organisations who are interested in, or who could be affected by, the proposed development and/or operational activities of the development. The role of the Interested and Affected Parties (I&APs) are stipulated in the regulations of the Environmental Management Act as follows:

23. (1) A registered interested or affected party is entitled to comment in writing, on all written submissions made to the Environmental Commissioner by the applicant responsible for the application, and to bring to the attention of the Environmental Commissioner any issues which that party, believes may be of significance to the consideration of the application, as long as -

- (a) comments are submitted within 7 days of notification of an application or receiving access to a scoping report or an assessment report;
- (b) the interested and affected party discloses any direct business, financial, personal or other interest which that party may have in the approval or refusal of the application.

(2) Before the applicant submits a report compiled in terms of these regulations to the Environmental Commissioner, the applicant must give registered interested and affected parties access to, and an opportunity to comment in writing on the report. (3) Reports referred to in sub regulation (2) include -

- (a) scoping reports;
 - (b) scoping reports amended and resubmitted;
 - (c) assessment reports; and
 - (d) assessment reports amended and resubmitted.
- (4) Any written comments received by the applicant from a registered interested or affected party must accompany the report when the report is submitted to the Environmental Commissioner.
- (5) A registered interested or affected party may comment on any final report that is submitted by a specialist reviewer for the purposes of these regulations where the report contains substantive information which has not previously been made available to a registered interested or affected party.

24. The applicant responsible for an application must ensure that the comments of interested and affected parties are recorded in reports submitted to the Environmental Commissioner in terms of these regulations, and comments by interested and affected parties on a report which is to be submitted to the Environmental Commissioner may be attached to the report without recording those comments in the report itself.

2017.10.31

Erongo Gold Project - BID

GGM

We therefore invite all I&APs to provide in writing, any issues and suggestions regarding the proposed development. This correspondence must include:

1. Name & Surname;
2. Organization represented;
3. Position in the organization;
4. Contact details and;
5. Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application.

All contributions, comments and concerns must be submitted by 1st December 2017. Subsequent to the issuing of the EIA report the registered and interested parties will be provided with a further 15 working day review period. If we do not receive any comment from you, it will be accepted that you do not have any objections/comments with regard to the project.

For further information, or to register as an Interested or Affected Party, please contact:

Mr. Philip Hooks (EIA Coordinator)

Fax: (+264-61) 225 304

E-Mail: philip.hooks@gecko.na

Friday, October 20 2017 | NEW ERA

PUBLIC MEETING NOTICE
ENVIRONMENTAL IMPACT ASSESSMENT FOR EPL6440 PROSPECTING ACTIVITIES, ERONGO MOUNTAINS & WESTERN PLAIN, ERONGO REGION

In terms of the Environmental Management Act (No 7 of 2007) and the Environmental Impact Assessment (EIA) Regulations (Government Notice No. 30 of 2012), notice is hereby given to all potential interested and affected parties that an application will be made to the Environmental Commissioner for environmental clearance for prospecting activities within Exclusive Prospecting Licence (EPL) 6440.



Figure. Map of project area between Karibib and Omaruru.

Project: Erongo Gold Prospecting
Proposer: Gecko Gold Mining (Pty) Ltd
Coordinator: Mr. Philip Hooks

Public Information Meetings:
 1st November 2017 at the Usab Community Hall (Karibib) at 2pm and the Omaruru Rest Camp (Omaruru) at 8pm

You are hereby invited to attend either public meeting and share any comments, issues or concerns related to the proposed prospecting activities, for consideration in the EIA Report and Environmental Management Plan.

Should you require any additional information please contact Mr. Philip Hooks:
 Cell: 081-1278936, Fax: (+264-61) 225304 or E-Mail: philip.hooks@gecko.na

Written submissions must be made before
 1st December 2017

Friday, October 27 2017 | NEW ERA

PUBLIC MEETING NOTICE
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 1st December 2017

FRIDAY 20 OCTOBER 2017

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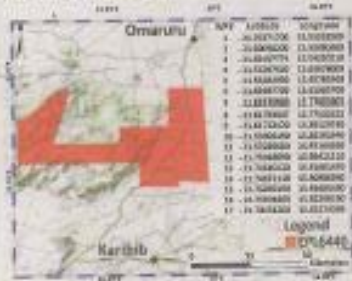


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Call: 081-1279936
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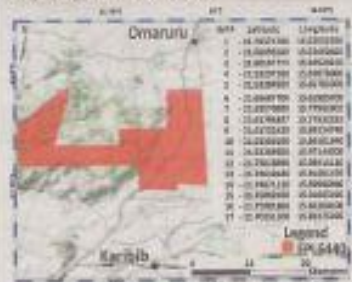


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Fax: (+264-61) 225304
E-Mail: philip.hooks@gecko.na

Written submissions must be made before 1st December 2017

FRIDAY 21 OCTOBER 2017

Erongo Gold Mining Prospecting EIA- Minutes of Public Meetings – 1.11.2017

Philip Hooks presented the project and facilitated the public consultation of the EIA process.

Place: Karibib/Usab Community Hall – 2pm.

Comments / Queries / Concerns	Response
<p>The EPL6440 covers an area that includes the Erongo Mountain Rhino Sanctuary Trust (EMRST); the chairperson of the trust presented a letter from the trust's attorneys relaying the member's objection to prospecting within the boundaries of the EMRST – Kai-Uwe Denker.</p>	<p>A request was made to provide a map of the trust – Philip Hooks</p>
<p>Would the farmers be willing to allow non-invasive prospecting with access to the farms for ground mapping or rock and soil sampling? From the soil sampling plan that was provided from the geologists most of the work will occur on the plain area east of the mountainous area – Philip Hooks</p>	<p>The members of the trust do not want anyone to enter the EMRST area due to sensitivity of the area</p>
<p>If a mine was to start what would the life of the mine be and how far will the mine be from the towns – Saima Shihepo</p>	<p>The current project is for exploration only and should mining ever go ahead it is not known now how long mining could go on for; likewise it is not possible to state now where the mine site would be situated – Philip Hooks</p>
<p>Our company would be interested in providing support services to the camp site – Joos Fourie</p>	<p>Noted</p>

Philip Hooks presented the project and facilitated the public consultation of the EIA process.

Place: Omaruru Rest Camp Conference Hall – 6pm.

Comments / Queries / Concerns	Response
<p>The concerns we have concerns that exploration results in holes, pits and even quarries that will endanger the domestic and wild animals. There is also a concern that the chemicals used are a safety hazard – Daniel Rusberg</p>	<p>As part of the requirement of the environmental management plan, rehabilitation of any invasive exploration activities is required by the company – Philip Hooks</p>
<p>The concerns are that should the results of the exploration be very positive then mining will be the next step. What will the mine layout look like, isolated areas or consolidated in one area? What will the life of mine be? This will have impacts on business. There will be uncertainties about the future and viability of the farms and the business they generate</p>	<p>These are valid concerns. To provide for a robust assessment of the impacts it will be beneficial if each farmer / member of the trust could provide relevant information about their farms that provides a baseline for the agricultural and touristic environment that you wish to preserve. – Philip Hooks</p>

**REPUBLIC OF NAMIBIA****MINISTRY OF AGRICULTURE, WATER AND FORESTRY**

Tel: (061) 2087555
Fax: (061) 221733
Email: Joseph.Amunime@mawf.gov.na

Office of the Permanent Secretary
Government Office Park
Private Bag 13184
WINDHOEK

Enquiries: Ms L. Afrikaner
Tel: (061) 208 7172

Phillip Hooks
Environmental Specialist/EIA Project Coordinator
Gecko Namibia

Dear Mr. Hooks

SUBJECT: NOTIFICATION OF THE EIA PROJECT FOR EPL6440 IN ERONGO REGION

Your letter dated 10 November 2017 from your office bears reference and is hereby acknowledged.

The Department of Water Affairs and Forestry (DWAF) in the Ministry of Agriculture, Water and Forestry has gone through the notification of the EIA project for EPL6440 in the Erongo region. In view of providing comments to the EIA document in terms of projects activities which falls within the mandate of the Directorate of Water Resources Management (DWRM), the comments are attached herewith.

Sincerely,


Percy W. Misika
PERMANENT SECRETARY
Ministry of Agriculture, Water & Forestry

EIA FOR THE PROPOSED FOR EPL6440 IN ERONGO REGION
RESPONSE SHEET FOR INTERESTED AND AFFECTED PARTIES

Participant 1. Name: Laurica Afrikaner	Organization: Ministry of Agriculture, Water and Forestry: Water Environment Division
Position: Hydrologist	Telephone: 061-2087172
Fax: 061-2087160	E-mail: Laurica.Afrikaner@mawf.gov.na

Comments/Suggestions/Questions

DIRECTORATE OF WATER AFFAIRS AND FORESTRY

GENERAL COMMENTS

- How many sealed septic tanks will be used or build for the ablution facilities on the site and for what population.

OVERALL COMMENTS

Please find below conditions for building a septic tank

- The system as a whole shall be operated in such a manner that no health hazards, nuisances or pollution of surface or underground water occurs.
- No intractable or toxic waste shall be allowed to find its way into the septic tanks.
- All septic tank facilities must be constructed in accordance with the Namibian code of practice for septic tanks.
- Septic tanks may be constructed of any suitable non-corrosive material in order to provide an average retention period of twenty-four hours. The compartments of the septic tank must be covered by a lid.
- Septic tank construction shall incorporate a vertical baffle to enhance the removal of sludge and floating material, and a manhole to facilitate desludging.
- Satisfactory methods shall be used for the removal and disposal of grit, screenings, floating debris and sludge. None of these products shall be disposed of to any person for any purpose.
- No borehole, dwelling or occupied building shall be allowed within 500 meters of the nearest septic tank.

Philip Hooks
Environmental Specialist / EIA Project Coordinator
Gecko Namibia

Permanent Secretary
c/o Ms. Saima Amadhila
Ministry of Agriculture, Water & Forestry

10th November 2017

RE: NOTIFICATION OF THE EIA PROJECT FOR EPL6440 IN THE ERONGO REGION

Dear Permanent Secretary

I have been tasked to undertake an **Environmental Impact Assessment (EIA)** in terms of the Environmental Management Act (No 7 of 2007) and the EIA Regulations (Government Notice No. 30 of 2012). Notice is hereby given to all potential interested and affected parties that an application will be made to the Environmental Commissioner for an **environmental clearance (EC)** for prospecting activities within Exclusive Prospecting Licence (EPL) 6440. The EPL have been granted to Gecko Gold Mining (Pty) Ltd but no prospecting activities may start until EC has been issued by the Ministry of Environment & Tourism. The EPL is located within the Erongo Region over the Erongo Mountain area.

Public consultation in the form of two public meetings took place on the 1st November 2017.

1. The first meeting took place at **Usab Community Hall** in Karibib at 2pm
2. The second meeting took place at **Omaruru Rest Camp** in Omaruru at 6pm

I have consulted with members of your ministry. Namely, Mr. Usurua from the Water Directorate in Karibib and Mr. Venomukona from the Agriculture Directorate in Omaruru and Mr. Amadhila from the Forestry Directorate in Otjiwarongo.

I have included the **Background Information Document (BID)** and public meeting presentation with the email. The BID provides maps showing the location of the claims.

You are hereby officially invited to share any comments, issues or concerns related to the mining activity. These same comments, issues and concerns will be considered in the **EIA Report** and **Environmental Management Plan** if relevant to environmental issues.



Yours sincerely

FISHER, QUARMBY & PFEIFER
 ATTORNEYS NOTARIES CONVEYANCERS • RECHTSANWÄLTE NOTARIE GRUNDBUCHANWÄLTE • PROKUREURS NOTARISSE AKTEVERVAARDIGERS
 C/o Robert Mugabe Avenue and Thoror Street, Entrance at 43 Burg Street, Windhoek. PO Box 37, Windhoek, Namibia
 Tel: 00264-61-233 171/4 Fax: 00264-61-228 286 Email: monique@fqp.com.na

YOUR REF:

OUR REF.:JR/mvzi/238470

DATE: 31 October 2017

Gecko Gold Mining (Pty) Ltd
 No. 8 Sinclair Street
 Windhoek
 Namibia

Att: Mr Philip Hooks
 Fax: 061 225 304

Dear Sir,

RE: ERONGO GOLD PROSPECTING

We have been instructed by our client, The Trustees for the time being of the Erongo Mountain Rhino Sanctuary Trust of Namibia ("the Trust") to address this letter to you.

Our instructions are that you will be making an application to the Environmental Commissioner for an environmental clearance for prospecting activities within Exclusive Prospecting License 6440 area.

EPC 6440 is situated to a large extent over Farms that comprise the Erongo Mountain Rhino Sanctuary Trust ("EMRST"). For back-ground information on the Erongo Mountain Rhino Sanctuary Trust and their activities, please find attached hereto our prospect and visit their website under www.erongomountains.org.

In addition to being home to rare and in the case of the black rhino highly endangered animals, the farms that make up the EMRST are all used for the purpose of tourism and the protection and conservation of the animals and plant species occurring within the area of the EMRST.

Any prospecting and mining activity would drastically affect the safety and well-being of the rhino population, as well as the business of farm owners comprising the EMRST.

Our instructions are therefore to inform you as well as the relevant Ministries that our client objects to any and all prospecting activities on land that forms part of the Erongo Mountain Rhino Sanctuary Trust.

Our clients rights remain strictly reserved.

Yours faithfully

FISHER, QUARMBY & PFEIFER

PER: JENS ROLAND

PARTNERS
 GRAHAM STUART McCULLOCH, CHRISTIAAN JOHAN GOUWS, ADRIANA JACOBA VAN DER MERWE
 FLORIS PETRUS COETZEE, ALWYN ABRAHAM HARMSE, LEIGH-ANNE AGNEW, JENS ROLAND

ASSISTED BY
 JEROME GAYA, SEAN VINCENT McCULLOCH, CAITLIN QUINN

