

25 January 2023

Office of the Environmental Commissioner
Directorate of Environmental Affairs
Ministry of Environment & Tourism
P/Bag 13306
Windhoek

Dear Commissioner Timoteus Mufeti

REQUEST: EXEMPTION FROM HERITAGE SURVEYS

Excel Dynamic Solutions (Pty) Ltd was appointed by Resource 500, a UK-based exploration company, to perform environmental assessment studies and acquire necessary permitting for the Exclusive Prospecting Licence applications, EPL 7166, 7781, 7794, and 7167. The studies were performed between March 2022 and July 2022 and in accordance with Section 27 of the Environmental Management Act, No.7 of 2007, and its 2012 Environmental Impact Assessment regulations.

Our consultants finalized the reports for EPL 7166, 7781, 7794, and 7167 in July 2022 and submitted them to your offices and on the online portal under ECC Application No. 003864 and 3704 respectively.

In August 2022 we were informed as part of our weekly follow-ups on submitted projects that the online portal has crashed and must resubmit the reports. The stamped copy of the cover letters as proof of resubmission done on 8 August 2022 are attached to this letter. We complied with the resubmission request despite the fact that there was no official communication with affected stakeholders regarding the online system issues.

On 2 November 2022, we followed up again with your officials on the resubmitted reports. We were told that the reports are under review, however, no clearance will be issued because the Commissioner is traveling for COP27. The Consultant communicated this development to our clients as received.

In mid-November 2022 your office advised the Consultant about the new online portal and requested that we must resubmit the same reports that were resubmitted as hard copies after the system failed in August. The Consultant did create a new account as requested.

However, due to technical issues, the consultant and your officials could not access the account where the resubmission was done for verification and/or updates. This issue was raised on a phone call and in person with Mr. Damian Nchindo.

Our understanding was that the review of the reports for a decision to grant or refuse the ECC will continue under the old application numbers and or on hard copies resubmitted in August. It was for this reason that we have been updating our client since September that the reports are under review.

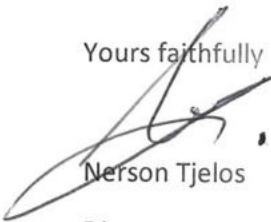
At the beginning of January 2022, it was suggested by your officials that we try another account. This account is now active and has all our new and old projects registered. The new ECC No. for EPL 7166, 7781, 7794, and 7167 are APP-00842 and APP-00852 respectively.

Unfortunately, the verification process for EPL 7166, 7781, 7794, and 7167 this time around suggested that we provide the Heritage Council Consent Letters before evaluation can be done. Heritage consents were not required in 2022 when we carried out the assessments for these properties - and that is why we were able to submit both online and hard copies. It means cannot be uploaded and should we succeed to upload them on our new portal, they will have to undergo another verification process plus 14 waiting days - as this is a standard procedure for reports uploaded online.

The client is concerned that asking for Heritage surveys at this stage (almost a year after the assessments were carried out) is unfair and costly as some of the licenses are expiring in less than a month and they have been requested by MME for representation. Having environmental clearance certificates in place is one of the key requirements for a representation package. As professionals, we acknowledge the need for archaeology specialist input. However, the main concern is the timing for which this request was made. The proponent has been waiting for feedback on ECCs since August 2022.

I am writing to request for the Commissioner's office to have a look into this issue and consider granting clearance certificates to our client for EPL 7166, 7781, 7794, and 7167 with conditions to carry out archaeological surveys as soon as the clearances are issued.

Yours faithfully



Nerson Tjelos

Director

EXCEL DYNAMIC SOLUTIONS
PO Box 997154, Maerua Mall
info@edsnamibia.com
Reg No: CC/2015/000984
VAT No: 6719744-01-5

Excel Dynamic Solutions Pty Ltd

Cell No. +264 81 152 4420



Excel Dynamic Solutions
(PTY) Ltd

Reg. 2019/0817

Date: 02 August 2022

The Office of the Environmental Commissioner
Ministry of Environment, Forestry and Tourism
Private Bag 13306 Windhoek, Namibia

Attention: Mr. Timoteus Mufeti

Dear Sir,



Re: Submission of the Final Environmental Scoping Assessment (ESA) Report and Draft Environmental Management Plan (EMP) for the Proposed Prospecting & Exploration Activities on Exclusive Prospecting Licences (EPLs) No. 7166, 7781 & 7794 located Northeast of Grootfontein in the Otjozondjupa Region, Namibia: Environmental Clearance Certificate (ECC) Application No. 003864

Resource Five Hundred Namibia (Pty) Ltd (The Proponent) appointed Excel Dynamic Solutions Pty Ltd (EDS Namibia), a team of Independent Environmental Consultants to conduct the required Environmental Scoping Assessment (ESA) Study and apply for the Environmental Clearance Certificate (ECC) according to the Environmental Management Act (EMA) No. 7 of 2007 and its 2012 EIA Regulations. The ESA Study is for the proposed prospecting and exploration Activities of Base & Rare Metals and Precious Metals on Exclusive Prospecting Licences (EPLs) 7166, 7781 & 7794 located northeast of Grootfontein in the Otjozondjupa Region, Namibia (*The Project*).

The ESA process is completed, and ESA Report and Draft Environmental Management Plan (EMP) are compiled. EDS Environmental Consultants hereby submit the two documents (ESA Report and Draft EMP) with associated appendices for your evaluation and consideration of the Project ECC.

Yours Sincerely,

EXCEL DYNAMIC
SOLUTIONS (PTY) LTD
Reg. No: 2019/0817
P.O. Box 997154, Maerua Mall
Tel: +264 61 259 530
Email: info@edsnamibia.com

Mr. Silas David: Environmental Assessment Practitioner

Excel Dynamic Solutions Pty Ltd, E: public@edsnamibia.com

+264 61 259 530
info@edsnamibia.com
www.edsnamibia.com
122 Robert Mugabe Avenue, Windhoek Central
P.O. Box 997154, Maerua Mall, Windhoek