

**APPENDIX C1: EIA NOTIFICATION IN THE
NEWSPAPERS (*ALLGEMEINE ZEITUNG, DIE
REPUBLIKEIN AND NAMIBIAN SUN*), DATED 15 & 22
DECEMBER 2022**



PUBLIC NOTICE:

ENVIRONMENTAL IMPACT ASSESSMENT FOR BRICK MANUFACTURING PROJECT AT OKAHAO, OMUSATI REGION & INVITATION TO A PUBLIC MEETING

In accordance with the Environmental Management Act (No. 7 of 2007) (EMA) and the Environmental Impact Assessment (EIA) Regulations (Government Notice No 4878 of 2012), notice is hereby given to all possible Interested and Affected Parties (I&APs) that an application will be made to the Environmental Commissioner for an environmental clearance as follows:

- Project:** Brick Manufacturing Project
- Proponent:** Gandja Ayihe Ndeshipanda Iyambo
- Location:** Omakuku Village, Okahao Constituency, Omusati Region
- Date of Public Meeting:** 22nd December 2022
- Venue:** Project Site, Omakuku Village
- Time:** 10H00 – 13H00
- Deadline for submission of comments:** 10th January 2023
- Register as I&APs @:** reddunes18@gmail.com
- Call:** +264 81 147 7889

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PUBLIC NOTIFICATION & CALL FOR PARTICIPATION ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED DEWATERING OF THE UNDERGROUND MINE AT KOMBAT TOWN IN THE OTJOZONDJUPA REGION

Under the Environmental Management Act No. 7 of 2007 and its 2012 Environmental Impact Assessment (EIA) Regulations, the public is hereby notified that an application for an Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner. Water resources developments: the abstraction of water (dewatering) at a volume exceeding the threshold authorized in terms of a law relating to water resource are listed in the EIA Regulations as activities that cannot be undertaken before they are environmentally cleared.

Project Location and Background: The proposed activities entail the dewatering of the Kombat underground mine (groundwater abstraction) to enable the proposed underground mining works. The water abstracted from the underground mine will be pumped from the Mine to into the shaft, from there, it is distributed to off-takers such as nearby commercial farm pipeline, NamWater's Eastern Carrier Water Supply Scheme, Kombat Town, Community projects and the Mine Plant (for Mine operations). The dewatering will take place on Mining Licences 73B, 16 & 9 (the old Kombat Mine, hereinafter referred to as The Mine), located close to the Kombat Town on the southern margin of the Otavi Mountain Range and about 41km east of Otavi on the B8 Road to Grootfontein in the Otjozondjupa Region. The Mine is a past-producing copper, lead and silver site that was intermittently in operation from the early 1900s to 2007, and has been on care and maintenance since early 2008. To resume the mining activities, an ECC has been granted for surface mining activities, initially in July 2018 and renewed in June 2021. The Mine intends to expand its operations by undertaking underground exploration and mining works (to which an EIA Study ongoing to obtain an ECC). However, the Mine has a history and still faces the challenge of groundwater ingression that hinders mining works, which is anticipated to further impact underground mining activities, if not properly controlled (by managed dewatering). Thus, an ECC for dewatering the underground mine environment needs to be applied for and obtained from the Environmental Commissioner upon completion of and approval the EIA Study before dewatering starts.

Project Proponent: Trigon Mining (Namibia) (Pty) Ltd
Environmental Consultant: Excel Dynamic Solutions Pty Ltd (EDS Namibia)

The public is therefore invited to register as Interested and Affected Parties (I&APs) and submit comments or raise issues / concerns and or receive further information, including the details of the Consultation Meeting. Registration requests and comments should reach EDS in writing before or on Friday, 27 January 2023.

Please note that a Consultation Meeting will be held in Kombat, and Meeting details will be communicated with all registered I&APs in due course:

Contact Person: Ms. Fredrika Shagama
 Telephone: +264 (0) 61 259 530
 Email: fshagama@edsnamibia.com / public@edsnamibia.com

PUBLIC NOTIFICATION & CALL FOR PARTICIPATION ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED UNDERGROUND EXPLORATION AND MINING ACTIVITIES AT THE KOMBAT MINE IN THE OTJOZONDJUPA REGION

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MUNICIPALITY OF OKAHANDJA



PROCUREMENT MANAGEMENT UNIT

MUNICIPALITY OF OKAHANDJA HEREBY INVITES REPUTABLE AND EXPERIENCED COMPANIES FOR THE PROCUREMENT OF REFUSE REMOVAL FOR OKAHANDJA TOWN

PROCUREMENT REF. NO.	NCS/ONB/OKHMUN-01/2022
TITLE:	Procurement of SME Cleaning: Refuse Removal
DESCRIPTION:	Okahandja Municipality is looking for Sme companies to clean within the Municipal Area of Okahandja for the period 2023-2025
CLOSING DATE:	Tuesday, 20th December 2022 at 11H00am at the Municipality of Okahandja
BIDDING DOCUMENTS:	Available from Friday 11th November 2022 at 10H00 am at the offices of the Municipality of Okahandja, Erf 65 Martin Neib Avenue, Okahandja
LEVY (non-refundable):	N\$ 100.00 payable in cash at the Cashier at Municipality of Okahandja, Erf 65 Martin Neib Avenue, Okahandja
ELIGIBILITY:	Namibian registered companies
RESERVATION:	Companies registered in Otjozondjupa region only
ENQUIRIES:	For Administration queries: Mrs. Magdalena Mutuku Tel No: +264 62 505142 Email: mlikuwa@okahandja.org.na For Technical queries: Mr. Kazombiri Kamuingona Tel no: 264 62 505112 Email: kazombiri@okahandja.org.na
DELIVERY ADDRESS:	The Bid Box Main Office Building Municipality of Okahandja Erf 65 Martin Neib Avenue Okahandja, Namibia

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‘Next generation’ for fin markets

ETFs, Moody’s, Blackrock and S&P predict tokenisation boom

Many asset managers have taken steps to access blockchain technology and develop digital asset strategies in the past year.

LONDIWE BUTHELEZI

Tokenisation, or the use of blockchain technology to create tokens backed by assets, is rapidly growing, with the Boston Consulting Group forecasting that asset tokenisation as a business opportunity will grow 50 times to US\$16 trillion in 2030.

This equates 10% of global GDP, though a great many in South Africa probably haven’t heard about it.

Yet anyone with a discretionary investment and looking beyond the stock market to generate returns may soon come across this asset class, which is joining options such as unit trusts and exchange-traded funds (ETFs).

Tokenisation involves converting any asset – from gold to real estate shares, art and other investments – into a digital token that can be used on blockchain applications. It is not a widely known phenomenon in South Africa, but it is emerging in the local market too.

EXPANSION

In 2020, Cape Town-based property developer, Flyt Property Investment, launched Africa’s first property-backed security token.

In April 2022, the Intergovernmental Fintech Working Group said that after exploring the implications of tokenisation in SA’s financial markets, it had begun work to inform the policy and regulatory responses to this growing trend.

In the payments space, PayGate and PayFast already offer merchants using their payment systems an option to receive a token from customers instead of storing people’s credit card details.

The world’s largest asset manager, BlackRock, is predicting that tokenisation is “the next generation” for financial markets and the trading of securities.

BlackRock launched its first digital-assets fund, the blockchain and tech fund, in April. Early in December, it launched iShares Metaverse ETF, and it seems that its expansion in blockchain funds is just beginning and not fazed by the current crisis.

Now, one of the biggest credit rating agen-



Tokenisation involves converting any asset – from gold to real estate shares, art and other investments – into a digital token that can be used on blockchain applications.

PHOTO UNSPLASH/HITESH CHOUDHARY

“Tokenisation would allow a far greater number of investors to invest in asset classes previously only available to institutional investors.”

Moody’s

cies, Moody’s, is predicting that tokenisation is about to shake up investing even more. It is starting to open the doors for ordinary people to invest in private markets, like private equity, which was traditionally the playground for institutional investors and the rich.

MOODY’S

Moody’s said leading fund managers have started launching ETFs that allow their clients to get exposure to digital assets. That’s because tokenisation allows illiquid assets like private equity and infrastructure funds to be a little more liquid as they can suddenly be traded daily.

Moody’s says that many asset managers

have taken steps to access blockchain technology and develop digital asset strategies in the past year.

It believes that the primary goal for doing so is to boost flows into their alternative investment funds, like private equity. If they can convert such assets into tradable digital securities and represent the assets as fractional interests on a blockchain, they can rapidly multiply the potential investor base for their private market strategies.

“Tokenisation would allow a far greater number of investors to invest in asset classes previously only available to institutional investors ... Expanding investor access to private assets could fuel growth in alternative investment funds, a positive for asset managers given these products’ higher fee rates,” wrote Moody’s in its latest sector outlook report.

According to the ratings agency, retail investors are also increasingly looking to put some of their money on private market assets because of their historically lower correlation to what happens in the stock market and fixed-income portfolios.

S&P Global’s Dylan Thomas pointed out that blockchain has already attracted larger private equity firms, and it’s only a matter of time before smaller firms follow suit to compete for inflows.

- Fin24



New Zealand is planning a “world first” levy on emissions of methane and nitrous oxide, produced by the nation’s six million cows and 26 million sheep as a step towards tackling climate change. PHOTO UNSPLASH/DANIEL QUICENO

Amended cow burp tax plans still stink

New Zealand’s government yesterday outlined changes to controversial plans to tax the farts and burps of livestock, but a leading farmers group said it was still opposed to the emissions reduction scheme.

New Zealand is planning a “world first” levy on emissions of methane and nitrous oxide, produced by the nation’s six million cows and 26 million sheep as a step towards tackling climate change.

Under the proposed scheme, farmers would have to pay for gas emissions from their animals.

The plans have caused uproar in New Zealand’s agricultural community and sparked nationwide protests.

Farmers have demanded Prime Minister Jacinda Ardern’s centre-left government ditch the tax, which they warn will make food more costly and could put livelihoods at risk.

The changes outlined yesterday include allowing farmers to use on-farm forestry to offset their carbon emissions, and a promise to keep emissions pricing low.

“Our shared goal is supporting farmers to grow their exports, reduce emissions, and maintain our agricultural sector’s international competitive edge,” Ardern said in a statement.

“With or without the government’s proposals, New Zealand needs to be at the front of the queue to stay competitive in a market that is demanding sustainably produced products,” she warned.

‘UNREALISTIC TIMELINES’

Ardern hopes her cabinet will make a final decision on pricing for the agricultural emissions scheme in early 2023 with a five-year pricing scheme due to start from 2025.

The head of New Zealand’s leading agriculture advocacy group said the amended plans still stink and criticised the government’s “unrealistic timelines”.

“Everyone else is talking about food security and working with farmers to develop practical on-farm solutions,” Andrew Hoggard, president of New Zealand’s Federated Farmers, said in a statement.

“Only New Zealand is taking the punitive step of taxing efficient, unsubsidised food production, even if it comes at huge costs.”

While Ardern wants “an emission reduction system set up that lasts”, Hoggard accused her government of making “vague promises of an obscure future review with unknown terms of reference”.

“The response is so high level, we may not be able to clearly understand the detail until we actually see it when introduced as legislation next year,” he warned.

- Fin24/AFP

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**APPENDIX C2: EIA CONSULTATION MEETING
MINUTES AND ATTENDANCE REGISTER**

24 January 2023

PUBLIC & STAKEHOLDERS' CONSULTATION MEETING MINUTES:

ENVIRONMENTAL IMPACT ASSESSMENT STUDIES FOR THE PROPOSED DEWATERING OF THE UNDERGROUND MINE AND UNDERGROUND EXPLORATION & MINING ACTIVITIES AT THE KOMBAT MINE IN THE KOMBAT SETTLEMENT OF THE OTJOZONDJUPA REGION, NAMIBIA

PROJECT PROPONENT: TRIGON MINING (NAMIBIA) (PTY) LTD

Date: Tuesday, 24 January 2023

Time: 11h00 to 12h35

Venue: Old Golf Course House in Kombat Settlement



The Consultation Meeting was attended by over (50) people as provided in the attendance register attached hereto.

INTRODUCTION AND WELCOMING REMARKS

The meeting was opened by Mr. Janna Lusse (Trigon Mining Namibia Representative) and welcoming was done by Ms. Fredrika Shagama (Environmental Consultant from Excel Dynamic Solutions (EDS)).

The meeting attendance register was circulated for the attendees to write down their names, contact details to be added to the list of I&APs and receive further information on the EIA process. Some printed copies of the Background Information Document (BID) were distributed among the attendees for self-reading.

MEETING AGENDA AND PRESENTATION

The agenda of the meeting included the following main points:

- **Explanation of what an EIA is, its Process and the Public Role in the Process:** The purpose of the meeting was provided to the attendees with reference to the Environmental Management Act (EMA) No. 7 of 2007 and its 2012 Environmental Impact Assessment (EIA) Regulations on Public Consultation. Ms. Shagama further explained what an EIA is and that the proposed activities at the Kombat Mine are some of the listed activities in the 2012 EIA Regulations of the EMA that cannot be undertaken without an Environmental Clearance Certificate (ECC) from the Environmental Commissioner. She further clarified that the Proponent (Trigon Mining Namibia) would like to apply for two ECCs, i.e., one for dewatering of the underground mine and the other ECC for underground exploration and mining activities.
- **Brief Description of the Project:** Ms. Shagama presented a summary of the proposed activities and emphasized that the activities have not yet commenced pending the EIA Studies, evaluation and approval of the EIA Reports and their Draft Environmental Management Plans (EMPs), and issuance of the ECCs.
- **Presentation of Potential Project Impacts:** Although the pre-identified potential positive & negative environmental and social impacts associated with the proposed project activities are listed in the BID copies distributed in the meeting, she touched on the main ones, as received from the I&APs who submitted comments prior to the consultation meeting.
- **Public Open Discussion (Interactive Session):** The meeting attendees were provided an opportunity to raise their concerns/issues and or comments for consideration in the EIA Reports and EMPs. The issues and comments recorded are presented in **Table 1** below. The questions and comments that could be addressed in the meeting were addressed by Ms. Shagama (for Environmental related queries) and Mr. Janna Lusse (for technical queries and issues pertaining entirely to Trigon). For comments and questions that could not be answered/addressed in the meeting were noted down for consideration and addressing in the EIA Reports and EMPs.

Table 1: Comments and issues raised during the Consultation Meeting in Kombat Settlement on the 24th of January 2023.

No.	Comment / Issue / Question or Concern	Name of Responder & Response:
1.	<p>Mr. G. H. Eggert (Farm Altona – Kombat South):</p> <p>(a) The long-term impact of mining should be analyzed in terms of mining (short-term, dependent on market commodity prices) vs farming (long-term investment)</p> <p>(b) The depth of dewatering should be provided in the documents.</p> <p>(c) The competent government ministries should make an informed decision on the mining activities to ensure that it does not significantly impact other land uses such as farming.</p>	<p>Ms. Fredrika Shagama (EDS Consultant): (a) and (c) These comments have been noted for incorporation into the Reports. However, we will let Trigon answer the question on the dewatering depth.</p> <p>(b) Mr. Janna Lusse (Trigon Mining Namibia): The depth at which the water will be pumped out is 438m to 30 level bottom. There is still another 450m down to 20 level. This will be left as a water sump but the work will only be done until 450m maximum.</p>
2.	<p>Mr. M. Spitze (Private Metallurgist):</p> <p>(a) How much water would be pumped out during mining on a monthly basis? We would like to know especially from neighbouring farmers' perspective.</p> <p>(b) What effect would the dewatering have on the water levels?</p> <p>(b) Will Trigon continuing with the old Tailings storage facility?</p>	<p>Mr. Janna Lusse (Trigon Mining Namibia): (a) The anticipated volume to be pumped at a constant rate will be ranging from 800 and 1200m³/hour, but this may increase as we mining works progresses, probably in a year's time from commencement.</p> <p>(b) There are impacts of this activity on the groundwater level, and this is why the EIA is done for it and a permit to do so applied for so that the regulatory</p> <p>(c) There is an ongoing construction of a new TSF. Therefore, we will use this advanced facility.</p>
3.	<p>Mr. B. Kawana (Community Member):</p>	<p>Ms. Fredrika Shagama (EDS Consultant): Yes, the management, mitigation and rehabilitation measures will be provided in the EMP for implementation by Trigon during the</p>

No.	Comment / Issue / Question or Concern	Name of Responder & Response:
	<p>(a) Are there contingency plans for addressing negative impacts listed in the BID and plans for environmental rehabilitation throughout the project phases?</p> <p>(b) Is there a Human Capital Plan for Trigon for the mining activities, in terms of employment and other opportunities when the mining activities start? This is especially on the training of community members on how to do most of the jobs that can be trained for instead of bringing people from other areas.</p>	<p>project cycle. This will also restoration of disturbed areas. This will also include consideration of the idea presented by Mr. Eggert on the Navachab post-mining TSF use of bio-restoration (allowing vegetation re-growth).</p> <p>Mr. Janna Lusse (Trigon Mining Namibia): There is a plan. The office has a list of names of people from Kombat who will be prioritized for the different jobs required when we start. Underground works require a lot of manpower compared to surface mining where most of the work are done by machinery and less man power.</p>
4.	<p>Mr. G. H. Eggert (Farm Altona – Kombat South): (a) EDS should advise the Proponent to come up with a Rehabilitation Plan through a Fund at the ministry to cater for post-mining rehabilitation.</p> <p>(b) Is there provision for local farmers for water supply as well as community projects?</p> <p>(c) An analysis needs to be done on the water contribution to water usage. This is in terms of the Eastern Water Carrier (water losses vs uses), i.e., how much of the water NamWater is effectively reaching the far targeted central areas (customers/end consumers). Therefore, an analysis should be done prior to final allocations.</p>	<p>Ms. Fredrika Shagama (EDS Consultant): These have been well noted for incorporation into the EMP. And yes there is provision for water supply to the local farmers, Kombat and community projects.</p>

No.	Comment / Issue / Question or Concern	Name of Responder & Response:
5.	Mr. L. Kamunima: Can the local hydropower project also be considered for water supply?	Ms. Fredrika Shagama (EDS Consultant): (a) We will present this to Trigon for consideration and see if they can help.
6.	Mr. E. Beukes (Kombat Resident): How will dewatering affect the water quality for end consumers?	Ms. Fredrika Shagama (EDS Consultant): There will be mitigation measures for implementation to avoid water pollution.
7.	Mr. Ritter: On laws and regulations, how will the community and farmers be assured that the ministries such as MEFT and MAWLR will monitor EMP compliance?	<p>Ms. Fredrika Shagama (EDS Consultant): The ECC usually comes with conditions, and one of the conditions will include Trigon ensuring that they submit Bi-Annual Environmental Audit/Compliance monitoring reports. These reports will include the monitoring environmental components such as groundwater. Therefore, Trigon will be doing monitoring that they will submit to an external Environmental Auditing firm to audit their compliance on an annual basis and report back to both the ministries and community.</p> <p>It may be difficult but it will also require commitment from Trigon team and effort to do the right to ensure their legacy as a company.</p>
8.	Mr. K. Utale (Otavi Town Council): We are currently getting treated water from NamWater. I would like to seek clarity and prevent confusion on the issue of after mine closure, the Town Council would be responsible for water treatment? Is that so?	Mr. Janna Lusse (Trigon Mining Namibia): This is a bit of confusion from preceding questions on groundwater pollution monitoring and compliance. Therefore, NamWater would not expect the Town Council to take over the water treatment even after mine closure.

No.	Comment / Issue / Question or Concern	Name of Responder & Response:
9.	<p>Ms. S. Andrian (Otavi Town Council): How will wastewater be handled onsite and where is that wastewater management facility referred to in the BID? And what assurance is there to make sure that groundwater is not polluted</p>	<p>Ms. Fredrika Shagama (EDS Consultant): The wastewater referred to here will be recycled (close-system) in the processing plant and therefore, it will not be disposed of in the environment. The sludge/slurry like type of waste from the recycling will then be disposed of at the new and lined TSF onsite. Toilet water will be managed through the existing sewer reticulation systems.</p> <p>The activities to be undertaken underground would not necessarily pollute groundwater directly because the pumping will be done through a closed-pipe system whereby the water will be pumped to the surface. However, measures on how to mitigate the impact of groundwater pollution will be provided in the EMPs.</p>
10	<p>Ms. R. Mbango (Kombat Settlement Office- Administrator):</p> <p>(a) What is the current and future water supply to the Kombat community? Are there also plans to benefit the community and constituency at large? We have plans of undertaking urban agriculture, so the Settlement could use some of the pumped water.</p> <p>(b) Will the mine line the oxidation ponds as they are not currently lined?</p>	<p>Mr. Janna Lusse (Trigon Mining Namibia):</p> <p>(a) Since 1980, the water has been sent to Omatako-Von Bach dams for the central areas' water supply. However, the plan for the proposed dewatering is to supply the local farmers, Kombat community, community projects, mine plant and then NamWater.</p> <p>(b) Yes, this is already in progress.</p>
11	<p>Ms. S. Adrian (Otavi Town Council): What are the main hazardous waste that are likely to be generated from the mining and related activities?</p>	<p>Ms. Fredrika Shagama (EDS Consultant): These type of waste conclude used fuels, oils, and grease as well as potential chemicals/additives used at the processing plant to process the</p>

No.	Comment / Issue / Question or Concern	Name of Responder & Response:
		ore. Fine materials blown by the wind from uncovered TSF would also pose a health risk.
<p style="text-align: center;">FINAL REMARKS AND CONCLUSION OF THE MEETING</p> <p><u>Conclusion and Closing Remarks by the Environmental Consultant (EDS):</u> Ms. Shagama thanked the attendees for their crucial input through comments and raising their concerns. She indicated to the attendees that all their comments, concerns and inputs had been noted down for consideration and addressing in the EIA Reports and EMPs. Furthermore, Ms Shagama informed the attendees that the Meeting Minutes will be prepared and appended to the draft EIA Reports for review (to be shared on the provided email addresses). The EIA documents will be submitted to the Environmental Commissioner at the Department of Environmental Affairs and Forestry (DEAF) for consideration of the ECC.</p> <p>The meeting was adjourned at 12h35.</p>		

Public / Stakeholders' Consultation Meeting Attendance Register

PROJECT: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED UNDERGROUND EXPLORATION AND MINING ACTIVITIES AT THE KOMBAT MINE IN THE OTJONONDJUPA REGION

Proponent: Trigon Mining Namibia (Pty) Ltd

Venue: *Old Golf Course Club house, Kombat*

Date: *Thursday, 24 January 2023*

Time: *11:00*

+ Deputies of the Underground Mine

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
1.	Rina Elis	Unemployed	eisr444@gmail.com	0818738366	<i>Elis</i>
2.	S. Shimwari	EMPLOYED		08795205722	<i>S. Sh</i>
3.	Keopshwa Tomanwa	Unemployed		0814443900	<i>Tomanwa</i>
4.	ROBERTS W.	N/A	N/A	08132224853	[Signature]
5.	Sandra Nakale	Unemployed.	Sandrahaakobas@gmail.com	0813530546	<i>g05.</i>
6.	Helena Willensen.	Unemployed.	helena.willensen@gmail.com	0815618651	<i>H. Willensen.</i>

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
7.	Wilhelm Halwede	Homberl Resort	willhelmannsbahn@gmail.com	082740895	
8.	N.S. Kefes	L.A.B. opporokur	kefaesjuniasnades@gmail.com	081299154	
9.	S. Walte	Homberl	081336106	0813136106	
10.	Katira Kaseera	Dyngpole opporokur	0813595983	0813595950	Katira
11.	Daniel Mathew	Community		0813514057	
12.	Gabriel Hainyura	Community		0813762719	gan
13.	Agustinus Halke	Community	0813744706	0813744705	A. H.
14.	Daniel Teofelus	Community		0812499337	
15.	Phillipus Tongen	Community		0816031595	
16.	Jonas Josephine	Community		0818919723	J.J.
17.	Mareus Albertina	Community		0813767590	
18.	Kateusa Annastasio	Community		08192748856	K.A.
19.	Natal Kefes	Barlormaker Ass	nathandilika@gmail.com	0812145922	
20.	Dean Aluvilu	Community	deanhu@gmail.com	0817606879	
21.	Matias festus	Deasel Mech	matiasfestus@gmail.com	0810431167	
22.	Malakia Immanuel	RUSTER AT	i.malakia133@gmail.com	0873539697	

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
23.	Ndenga Edward	Community		08132429801	
24.	JOSEPH NGA	Community		0813496403	
25.	Johannes Ahomou	Community		08153202829 0868202829	
26.	Daniel Mbundu	Community		0813336938	
27.	Bernard Nalileni	Community		0812748812	B.N
28.	Josef Makayi	Community		0816315859	
29.	Immanuel Gabriel	Community		0817546639	T.G
30.	Wenne Kolipa	Community		0817729649	
31.	Fruus Imukwuti	Community	caliperman13@gmail	0813995573	
32.	Noses Shikongo	Community		0816496055	
33.	ANDONISA-MARIZO	Community		0818440849	A.M
34.	Elias Shikongo	Community		081645058	
35.	Ntete Kamanga	Community		0816265920	
36.	Nelson Kasonga	Community		0812559477	
37.	Johannes Makayi	Community		0812153034	Makayi
38.	Edward Musinga	Community		0814829477	

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
39.	Konrad Kanyanga	Community		0813294480	KRC
40.	Telleman Nangole	Community		0812014291	F.N
41.	Josef Kanyetu	Community		0812991538	J.K
42.	Kamanga Ntaty	Community		081	
43.	Beniel HauFiky	Community		0812875113	
44.	Paulus Kampara	Community		0812878188	
45.	William Ndihyeta	Community		081	M.N
46.	Muhoko Makanyi	Community		0813520498	
47.	Lasarus Shakuna	Community		0817293444	
48.	Deny Garises	Community		08184461850	
49.	Jason Haipinge	Community		0817734269	
50.	Hausona Timotheus	Community		0817240560	
51.	Loide Salom	Community		0813520596	
52.	Johannes Injala	Community		0814521126	
53.	Jason Kandume	Community		0813371253	

Public / Stakeholders' Consultation Meeting Attendance Register

PROJECT: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED DEWATERING OF THE UNDERGROUND MINE AT KOMBAT TOWN IN THE OTJONZONDJUPA REGION

+ Underground Exploration
and Mining

Proponent: Trigon Mining Namibia (Pty) Ltd

Venue: Old Golf Course Club house, Kombat
Date: Tuesday, 24 January 2023
Time: 11:00

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
1.	Fredrika Shanyama	DDS - GAVIION ^{Consultant}	shanyamaf@trigonmining.com	061 259 530	<i>[Signature]</i>
2.	STEFANUS JOHANNES	ZDS GIS	stefanus@namibia.com	061 259 530	<i>[Signature]</i>
3.	ADELINUS SITHALUKENI	KOMBAT		081 247 9093	<i>[Signature]</i>
4.	LUCIA HONTHOAS	KOMBAT	lucia-honthoas32@gmail.com	081 242 7020	<i>[Signature]</i>
5.	Madigizela Mutnifq	Kombat	madigizela@mutnifq.co.na	081 275 8051	<i>[Signature]</i>
6.	ISAAC NASEB	Kombat	omeisa10096@gmail.com	081 267 7105	<i>[Signature]</i>

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
7.	K. Laurentius	LPB. Technician		081 751131161	
8.	A. Frans	Sec. Trijaya mine		0815627786	
9.	M. v. Mathah	Farm Seger	morli663@vietnam.com	08128677	
10.	M. Spitzer	private, Matlangit	spitzer@africaonline.com.ua	0815570066	
11.	C. F. Menne	Farm Awagobibtai	bergland@iway.na	0813384555	
12.	G. H. Eggert	Farm Altona (Kombit Sada)	gheggert@gmail.com	0811247694	
13.	M. R. Dhuan	FARM MITRAK	R. Dhuan@iway.na	0811222604	
14.	F. Benkus	Principal (Kombit Sada)	kombitprimer@schollegmail.com	0813212840	
15.	K. Urale	Olavi Joan Comit.	ur@iway.na	081-7356080	
16.	S. Andrian	Otavi Joan Council	sexerina@otavioh.com	081 644 2581	
17.	R. Mbanggo	OTRC - Kombit	rosambango234@gmail.com	0812890376	
18.	Neo. M	Liaison officer	neorono@gmail.com	0812019355	
19.	Ernst Mburuu	Com. member	-	0816202481	
20.	Menyando Milunga	SDC member	angelaracel93@gmail.com	0817894215	
21.	pato Matlangit	com. member	-	0817838244	
22.	Erica Gamses	Hei-Kom Councilor	-	0812072168	

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
23.	Sinoula Masiye	UNEMPLOYED	lizpatnck@gmail.com	08138830728	
24.	James Teuchepfer	Com. Member	JamesTeuchepfer@gmail.com	0816628143	
25.	Michael Mangundu	Unemployment	Michaelnear@gmail.com	0818711149	
26.	Anna Edward	Unemployed Com. Mem	annedward@gmail.com	0818429801	
27.	Vanessa Walker	unemployed	N/A	0812273557	V. Walker
28.	Weiner Karambua	Unemployed	MA	0812750385	
29.	F-Ann Walker	DEAF Unemployed	N/A	Text by default 0812590266	
30.	Estelle Springbok	unemployed	ezeSpringbok@gmail.com	0818965159	
31.	ALEXIA ANAIS	Unemployed	N/A	0816995147	ANAS
32.	Himeltha Mbatibae	unemployed	N/A	0813303572	
33.	Manley Francis	New Sommerau with A	Francis.manyley991@gmail.com	0818936096	
34.	Hairing Benhard	Unemployed	Benhardhairing@gmail.com	081438365	
35.	Mukuve Kagiva	Unemployed	N/A	0817186079	Mukuve
36.	Pius Protesin	Unemployed	N/A	0816777782	
37.	Lahya Shunana	Unemployed	N/A	0814992608	L. Shunana
38.	Rosalie Festus	Unemployed	N/A	0814744336	Rosalie.f

No	Name	Organization / Farm Name	E-mail Address	Telephone No.	Signature
39.	Libby Annaclotho M	UNEMPLOYMENT	N/A	0812955026	
40.	Theobias Anna	UNEMPLOYMENT	N/A	0512511648	
41.	Immanuel	UNEMPLOYMENT	N/A	0512746648	
42.	Joseph HEBER		twelove@gmail	0813161639	
43.	Foibe Johannes	unemployment	N/A	0812644003	Foibe
44.	Maja Shungu	unemployment	N/A	0818487003	
45.	STEFANUS JASER	Unemployment	N/A	0813534432	
46.	Lucia Cluschaes	Unemployment	N/A	0812167830	Lucia
47.	Amon Geraset	unemployment	N/A	0816837648	
48.	Elsie Khobe	unemployment	N/A	0816500794	EISE
49.	Susana koares	unemployment	N/A	0812072168	S. koares
50.	Johanna Eis	unemployment	N/A	0812717015	

**APPENDIX C3: EIA COMMENTS AND ISSUES /
CONCERNS AS RECEIVED - DEWATERING**

Comments as received from I&APs (in writing / via email)

1.

From: HW Freyer <hwfreyer@afol.com.na>
Sent: Thursday, December 29, 2022 11:10 AM
To: fshagama@edsnamibia.com
Subject: HW Freyer - Kombat Interested Affected Party

Good day Ms Shagama,

I would like to register myself as an Interested Affected Party for the EIA proposed dewatering of the underground mine at Kombat. We are farmers 15km from the mine, however our water for our game, cattle, staff and ourselves has been affected in the past when the Kombat mine was active and when dewatering activities took place. (That was already before 2008) So therefore we do **oppose a complete dewatering of** the mine as our farming activities come to a complete still stand. Our water is connected with the Kombat water, if it is dewatered there our water is completely GONE. No water- no life! The mine cannot dewater without considering the effects of the surrounding farmers and offering a water compensation to the farming community first before sending the water off to Windhoek through Namwater and earning money with it.

I am not sure whether this is the right channel, however an EIA needs to be done URGENTLY and ACTION needs to be taken URGENTLY for the new dumping site of Kombat town garbage. The location is absolutely unsuitable as it is a spot where water collects from the mountains during rainy season. Now all this garbage and batteries lies in water and affects the quality of drinking water for the Kombat town. Apart from this it is also an absolute DISGRACE - so visible to tourists who frequent this road very often. It is also a HEALTH HAZARD as children and others collect and roam around that area, which is not fenced off. Also during the dry season it is a FIRE HAZARD, especially for the RESETTLEMENT FARM who will be the first people to loose their grazing for their cattle if fire is not contained speedily.

This is a matter of grave concern and this matter should not be left unturned.

Best regards

HARTMUT and JENNY FREYER

2.

From: ONE Namibia - Joachim Rust [mailto:joachim.rust@one-namibia.com]
Sent: Tuesday, January 24, 2023 7:26 AM
To: Public@edsnamibia.com
Subject: RE: Reminder to the Consultation Meeting in Kombat on Tuesday, 24 January 2023 - EIA Studies for the Proposed Dewatering of Underground Mine and Underground Exploration & Mining Activities in Kombat, Otjozondjupa Region

Good morning Mrs. Shagama

I will not be able to attend today's meeting due to unforeseen circumstances.

However, my main concerns are as follows:

- The unsustainable lowering of groundwater levels
- The uncontrolled influx of jobseekers that will not be employed by Kombat – but will remain in the area without finding employment.
- The situation with the dumpsite of household refuse at Kombat.

We appreciate receiving the protocol of the meeting via mail.

Kind regards

Joachim Rust



3.

Re: EIA Study for the Proposed Dewatering, Exploration and Mining activities of /at the Underground Mine in the Kombat settlement, Otjozondjupa Region

Farm Segen, Nr 1254 registered as Interested and Affected Parties. The following concerns have to be addressed.

1. Dewatering of the proposed Mine. Water levels of the surrounding areas have to be monitored by Water Affairs plus also independent parties. This must be in a radius of at least 20km from the Mine site. Records have to be verified independently. There are also historic data available from Water Affairs.
2. Dewatering of Mine. There must be a study done to predict and understand the impact of the proposed dewatering on the surrounding areas. There are many surrounding farms that will be adversely affected by the dewatering. Many livelihoods depend on the utilisation of the groundwater.
3. Recharging water levels. The ground water which will be pumped and removed from the area can be recharged at strategic locations. A study to do this must be made to do this effectively.
4. Tailings water/waste water site. It's critically important that all Mining activities must be carried out in accordance with best mining principles to minimise environmental disturbance and pollution. The proposed waste water/ tailings dam site can be an issue for the surroundings with Wind and weather spreading dust etc. The old mining dump from past Mining activities is a bad example of this.

5. Downstream water pollution from mining activities. It's critically important that all mining activities must be carried out by using best mining practices to ensure that the environmental damage/consequences are minimised.

6. Underground blasting. This effects the surrounding areas. Historically there have been sand and dirt influxes into the surrounding water pumps on the farms.

7. Water quality and monitoring. This has to be monitored and reported to the surrounding communities. Arsenic and Cyanid are just some of the chemicals that come to mind. Mining activities use a lot of chemicals to extract. Care must be taken that these chemicals/substances do not pollute the environment.

8. Ground Water levels. All parties that are negatively effected by the Mine must be compensated.

9. Mining rehabilitation. Historically mines have a terrible footprint on the environment. This can be seen with the old tailings dam that was never rehabilitated. It is critically important that the Mine must be responsible for rehabilitation even when it closes down.

10. Environmental Management Plans. All affected parties and communities must be included and updated regularly.

11. Environmental Audits. All affected parties and communities must be included and updated regularly.

12. Responsible authorities have to monitor and control to ensure that the Environment is not adversely affected. All affected parties have to be informed of all decisions and processes by the relevant authorities.

We are looking forward to receiving feedback and trust that the Mining activities will not affect the environment negatively.

Regards

Mark von Maltzahn



4.

From: Kamburona Jolanda [mailto:KamburonaJ@namwater.com.na]

Sent: Wednesday, January 18, 2023 9:36 AM

To: Fredrika Shagama - EDS Namibia

Cc: Aupokolo Fillemon

Subject: RE: Background Information and Invitation to the Consultation Meeting on Tuesday, 24 January 2023 - EIA Studies for the Proposed Dewatering of Underground Mine and Underground Exploration & Mining Activities in Kombat, Otjozondjupa Region

Dear Fredrika,

Please register NamWater as an I&AP with the following contact details:

Jolanda Kamburona Kamburonaj@namwater.com.na [REDACTED]

Fillemon Aupokolo Aupokolof@namwater.com.na [REDACTED]

Once the mine is in operation again, the water abstracted from the current source will increase. This increase abstraction might have an impact on NamWater boreholes in the vicinity. Kindly consider this impact during the assessment.

Regards,

Jolanda

5.

P.O. Box 14, Kombat
[REDACTED]

jsheenya@gmail.com

18 January 2023

Excel Dynamic Solutions Pty Ltd

Tel: +264 61 259 530

Email: fshagama@edsnamibia, public@edsnamibia.comAttention:

Ms Fredrika Shagama

[Impacts of the Kombat mine Underground Exploration and dewatering on the Oldlocation \(Kavango Location\) community](#)

Dear Fredrika,

I trust you are doing well.

I am a resident of Kombat who have been living here since 2012. I am hereby writing this letter referring to what will happen to the community living at the old location housing unit located within the mining area.

In the past, Trigon Metals have been exploring for about 12 months to re-opening the mine. The Residents of Kavango location were informed that they will be relocated before mining activities commence, which was not done. So as a result few houses were damaged by flying rocks during blasting. Some community members were compensated an amount less than N\$ 20 000.00 and houses were demolished for mine development. This was inhuman treatment and un-professional act.

Looking to what happen in the past, it has raised a very significant question to be answered and addressed during the EIA's presentation before the next developments stage of the mine takes place. **WHAT WILL HAPPENING TO THE RESIDENTS LIVING WITHIN THE MINING AREA?**

See image below for the concerned location.

I am speaking on behalf of my fellow community living in Kombat old location and I am looking forward to replies.

Yours sincerely,

Jonas Sheenya



APPENDIX C4: COMMENTS & RESPONSE TRAIL

COMMENTS & RESPONSE TRAIL

ENVIRONMENTAL IMPACT ASSESSMENT STUDIES FOR THE PROPOSED DEWATERING OF THE UNDERGROUND MINE THROUGH ASIS WEST (AW) AND ASIS FAR WEST (AFW) AT THE KOMBAT MINE IN THE KOMBAT SETTLEMENT OF THE OTJOZONDJUPA REGION, NAMIBIA

Comments raised during the Public & Stakeholders' Consultation Period (from 15 December 2022 to 27 January 2023)

Name of Commenter, Date & Mode of Communication	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
<p>Hartmut and Jenny Freyer, 29 December 2022 via email</p>	<p>We are farmers 15km from the mine, however our water for our game, cattle, staff and ourselves has been affected in the past when the Kombat mine was active and when dewatering activities took place. (That was already before 2008) So therefore we do oppose a complete dewatering of the mine as our farming activities come to a complete still stand. Our water is connected with the Kombat water, if it is dewatered there our water is completely gone. No water- no life! The mine cannot dewater without considering the effects of the surrounding farmers and offering a water compensation to the farming community first before sending the water off to Windhoek through NamWater and earning money with it.</p>	<p>EDS Consultants: The comment has been well noted and incorporated into the EIA Report and EMP.</p> <p>The proposed dewatering of the underground mine is aimed at optimizing the groundwater inflow into the mine working areas and enable mining the copper ore safely and economically which cannot be done in a flooded mine. However, since the pumping of groundwater to enable that would potentially impact the surroundings water users such as farms, particularly downstream (north of the Mine), the EIA Study was necessary to assess this impact. Moreover, before dewatering is carried out, Trigon Mining is also required by law to apply for permit from the Department of Water Affairs by presenting their proposed water volumes, which the Department will evaluate and consider the permit, which may be issued with further restrictions or conditions to ensure that the dewatering does not negatively the biophysical and social environment in the long run. The permit and its conditions would then guide Trigon during dewatering and submit reports to the Department too for monitoring compliance check.</p> <p>Furthermore, NamWater and other considered offtakers (Kombat Settlement, Community projects, local farms who would benefit from the</p>



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Name of Commenter, Date & Mode of Communication	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
		pumped water and the Mine's processing Plant) would be suitable recipient/beneficiaries because the pumped water will need to be contained or diverted/distributed for use somewhere as it cannot be pumped directly into the environment (this would lead into flooding of Kombat and or surrounding areas, particularly the northern side of Kombat).
Joachim Rust, 24 January 2023 via email	The unsustainable lowering of groundwater levels	EDS Consultants: The issue has been noted down and incorporated into the EIA Report and EMP for the monitoring of groundwater levels and reporting thereto (before, during and after dewatering). This will be monitored through Environmental compliance audits done on a bi-annual basis to the Environmental Commissioner and Department of Water Affairs conditions in the Groundwater Abstraction & Distribution Permit (to be considered for issuance by the Department of Water Affairs). The commitment will be audited by external consultants on the recorded water level information every
Mark von Maltzahn, 27 January 2023, via email (2-page letter)	Dewatering of the proposed Mine. Water levels of the surrounding areas have to be monitored by Water Affairs plus also independent parties. This must be in a radius of at least 20km from the Mine site. Records have to be verified independently. There are also historic data available from Water Affairs.	EDS Consultants: Noted and included in the EMP for implementation.
	Dewatering of Mine. There must be a study done to predict and understand the impact of the proposed dewatering on the surrounding areas. There are many surrounding farms that will be adversely affected by the dewatering. Many livelihoods depend on the utilisation of the groundwater.	EDS Consultants: There has been water impact assessment studies done by other consultants such as SLR Namibia on the current dewatering done for surface mining. Therefore, there is a baseline on this impact as indicated in the Dewatering EIA Report (Environmental Baseline: Groundwater section). This SLR report can also be provided upon request.
	Recharging water levels. The ground water which will be pumped and removed from the area can be recharged at strategic locations. A study to do this must be made to do this effectively.	EDS Consultants: Noted for consideration. However, this can also be consider depending on the surplus after the pumped has been allocated to the offtakers listed in the Dewatering EIA Report.



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Name of Commenter, Date & Mode of Communication	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
	<p>Water quality and monitoring. This has to be monitored and reported to the surrounding communities. Arsenic and Cyanid are just some of the chemicals that come to mind. Mining activities use a lot of chemicals to extract. Care must be taken that these chemicals/substances do not pollute the environment</p> <p>Ground Water levels. All parties that are negatively affected by the Mine must be compensated</p>	<p>EDS Consultants: Groundwater monitoring (water quality) will be conducted for the Mine as prescribed in the EMP.</p> <p>EDS Consultants: Noted.</p>
<p>Ms. J. Kamburona, 18 January 2023 via email</p>	<p>Once the mine is in operation again, the water abstracted from the current source will increase. This increase abstraction might have an impact on NamWater boreholes in the vicinity. Kindly consider this impact during the assessment.</p>	<p>The concern has been well noted for consideration and incorporated under the respective sections of the EIA Report and EMP (Tables of mitigation measures under the Groundwater component)</p>
<p>Mr. G. H. Eggert (Farm Altona – Kombat South), 24 January 2023 in the Consultation meeting, Kombat</p>	<p>(a) The depth of dewatering should be provided in the documents.</p> <p>(b) The competent government ministries should make an informed decision on the mining activities to ensure that it does not significantly impact other land uses such as farming.</p>	<p>EDS Consultants: (a) Trigon answer the question on the dewatering depth.</p> <p>(b) Mr. Janna Lusse (Trigon Mining Namibia): The depth at which the water will be pumped out is 438m to 30 level bottom. There is still another 450m down to 20 level. This will be left as a water sump but the work will only be done until 450m maximum.</p>
<p>Mr. M. Spitze (Private Metallurgist), 24 January 2023 in the Consultation meeting, Kombat</p>	<p>(a) How much water would be pumped out during mining on a monthly basis? We would like to know especially from neighbouring farmers' perspective.</p> <p>(b) What effect would the dewatering have on the water levels?</p>	<p>Mr. Janna Lusse (Trigon Mining Namibia): (a) The anticipated volume to be pumped at a constant rate will be ranging from 800 and 1200m³/hour, but this may increase as we mining works progresses, probably in a year's time from commencement.</p> <p>(b) There are impacts of this activity on the groundwater level, and this is why the EIA is done for it and a permit to do so applied for so that the regulatory</p>



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Name of Commenter, Date & Mode of Communication	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
<p>Mr. G. H. Eggert (Farm Altona – Kombat South), 24 January 2023 in the Consultation meeting, Kombat</p>	<p>(a) Is there provision for local farmers for water supply as well as community projects?</p> <p>(b) An analysis needs to be done on the water contribution to water usage. This is in terms of the Eastern Water Carrier (water losses vs uses), i.e., how much of the water NamWater is effectively reaching the far targeted central areas (customers/end consumers). Therefore, an analysis should be done prior to final allocations.</p>	<p>EDS Consultants: These have been well noted for incorporation into the EMP. And yes there is provision for water supply to the local farmers, Kombat and community projects.</p>
<p>Ms. R. Mbango (Kombat Settlement Office-Administrator), 24 January 2023 in the Consultation meeting, Kombat</p>	<p>(a)What is the current and future water supply to the Kombat community? Are there also plans to benefit the community and constituency at large? We have plans of undertaking urban agriculture, so the Settlement could use some of the pumped water.</p> <p>(b)Will the mine line the oxidation ponds as they are not currently lined?</p>	<p>Mr. Janna Lusse (Trigon Mining Namibia):</p> <p>(a) Since 1980, the water has been sent to Omatako-Von Bach dams for the central areas' water supply. However, the plan for the proposed dewatering is to supply the local farmers, Kombat community, community projects, mine plant and then NamWater.</p> <p>(b) Yes, this is already in progress.</p>

**APPENDIX C5: COMMENTS & RESPONSE TRAIL
(THE DRAFT REPORT REVIEW)**

COMMENTS & RESPONSE TRAIL TO THE DRAFT EIA REPORT

ENVIRONMENTAL IMPACT ASSESSMENT STUDIES FOR THE PROPOSED DEWATERING OF THE UNDERGROUND MINE THROUGH ASIS WEST (AW) AND ASIS FAR WEST (AFW) AT THE KOMBAT MINE IN THE KOMBAT SETTLEMENT OF THE OTJOZONDJUPA REGION, NAMIBIA

Comments on the Draft Review of the EIA Report (from 14 to 22 February 2023)

Name of Commenter, Date & Mode of Communication	Comment/Concern/Issue	Response by EDS Consultants
Ms. J. Kamburona (NamWater), 22 February 2023 via email	Information of page 29-30 i.e. Fig. 4-11 to 4.15 is old data and thus more recent data is needed to have proper baseline data, which will reflect the real baseline information. More recent data preferably until 2022 should be presented	We will try to get the Fig. 4-11 to 4-12 updated with available data (if any), but Fig. 4-13 (the borehole) this data might not be available because according to Trigon the mine was on care and maintenance (with little done on groundwater monitoring as well). It is indicated above that Fig 4-13 that the borehole is located about 100km away from the Kombat Mine and therefore, the impact on its water level is very low.
	Chapter 4: What was the situation in past with relevance to identified impacts, when the mine was in operation and kept dry?	The mine was in operation for more than 50 years and the identified impacts and mitigation measures are well understood.
	NamWater supplies water from one of the mine shafts for emergency supply to the Central Area of Namibia (CAN). With the dewatering of the mine NamWater will lose this emergency source, which will have a major impact on the CAN water security. The impact on water supply security should be stated and quantified. NamWater's Hydrology Section can assist here.	According to Trigon "NamWater currently pumps at a maximum rate of 600m ³ /hr (average around 300m ³ /hr) during the dry season from No 1 shaft. The mine will directly tie in with the existing infrastructure and pump at a rate of 950m ³ /hr into the CAN supply infrastructure. The commercial aspects in terms of the mine now taking over NamWater's pumping duties still need to be discussed between Trigon and NamWater. The mine has tried on numerous occasions to set up a meeting with Mr Diergaard and his team to discuss the technical detail of this setup, and hopefully will get an audience with the team soon to finalize the tie in design".



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Name of Commenter, Date & Mode of Communication	Comment/Concern/Issue	Response by EDS Consultants
	<p>In Chapter 6 the impact of the dewatering on the regional water table should be properly modelled and quantified using a numerical groundwater flow model so that the area & users affected can be known in advance. This should be done as a specialist study.</p>	<p>The numerical modelling was done and completed by SLR in 2018 under the Report titled Kombat Mine Groundwater and Surface Water Assessment, which also covered the Asis West (AW) and Asis Far (AFW) West shafts to be dewatered for mining. This Report is also attached to this email for your reference. The conclusions made by SLR Namibia regarding dewatering impact has been incorporated into the EIA Report and EMP. The SLR Namibia Report is also attached as Appendix D.</p>
	<p>In Chapter 6, reference is made to sustainable pumping and/or permit requirements from MAWLR as a mitigation measure to the impact the dewatering will have on nearby boreholes. This measure is however insufficient as a mitigation measure, as mine dewatering is exercised for the purpose of keeping the mine dry to allow operations of the mine to continue by lowering the water table. This will most likely affect farmers' and NamWater boreholes. How can a permit deal with this? We are not looking at sustainable abstraction of water here, without the lowering of the water table. The whole purpose is to lower the water table around the mine. This means, it will not be sustainable abstraction. Another mitigation/management measure listed in the EMP on this impact is the monitoring of nearby boreholes, which is a good practice, but is not a mitigation/remedial measure. NamWater is of the opinion, that more mitigation/compensation measures should be put in place to reduce the impacts of the dewatering.</p>	<p>According to Trigon, the mine has been working with and assisting the neighbouring farmers for the last 50 years and will continue to do so if boreholes perhaps run dry.</p>
	<p>What is the mitigation for lowering the water table, which will inevitably occur? What are the mitigation/compensation measures for affected users whose boreholes run dry?</p>	<p>The mine will assist farmers with water where and if boreholes run dry. Nothing different than what was done during the last 50 years</p>
	<p>On the land subsidence and slope deformation (owing to excessive groundwater pumping / dewatering), impact, was this impact observed when the mine was in operation previously and the area was dewatered?</p>	<p>This was identified as a potential impact as it is common with mining, particularly underground mining (also dependent on the geology/rock</p>



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		environment stability). However, Trigon confirmed that this has not been observed nor experienced yet.
	On the Impact on biodiversity such as vegetation (root systems), what was the impact on the vegetation when the mine was in operation previously?	According to a Plant Study conducted for the Kombat Mine by Mannheimer in 2017 (also attached hereto) stated that there was minimal impact on vegetation due to the fact that the mining licenses' footprint is small and much of this footprint has already been heavily impacted in the past. This would also mean that although inevitable to some vegetation that overlies the underground mine, the footprint is small, so is the affected vegetation on that specific area (localized impact. Therefore, insignificant).