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



AZ Allgemeine Zeitung





OFFICE HOURS:

Monday - Friday:

09h00 - 17h00

info@msnamibia.org

BRICK MANUFACTURING PROJECT AT OKAHAO, **OMUSATI REGION & INVITATION TO A PUBLIC MEETING**

PUBLIC NOTICE:

ENVIRONMENTAL IMPACT ASSESSMENT FOR

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

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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

I Inder 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 undeground mine (groundwater abstarction) 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 offtakers 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) (Ptv) Ltd

nmental 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

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

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. Exploration and mining related activities are listed in the EIA Regulations as activities that cannot be undertaken or implemented before they are environmentally cleared.

Project Location and Background: The exploration and mining activities on Mining Licences 73B, 16 & 9 (the old Kombat Mine, hereinafter referred to as The Mine). The Kombat Mine is located close to the Kombat Town on the southern margin of the Otavi Mountain Range in the Otjozondjupa Region. Located about 41km east of Otavi on the B8 Road to Grootfontein, the Mine is a past-producing copper, lead and silver Mine 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. Thus, an ECC for underground works needs to be applied for and obtained from the Environmental Commissioner upon completion of and approval the EIA Study

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communicated with all registered I&APs in due course:

nmental Consultant: Excel Dynamic Solutions Pty Ltd (EDS Namibia)

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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 Munici- pality of Okahandja
BIDDING DOCUMENTS:	Available from Friday 11 th 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

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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

okenisation, 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

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

The world's largest asset manager, Black-Rock, 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.

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 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

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.



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 emis-

sions 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 agri-

cultural 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

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.



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PUBLIC NOTIFICATION & CALL FOR PARTICIPATION ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED OTJOZONDJUPA REGION

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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

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. Exploration and mining related activities are listed in the EIA Regulations as activities that cannot e undertaken or implemented before they are environmentally cleared

Project Location and Background: The exploration and mining activities on Mining Licences 73B, 16 & 9 (the old Kombat Mine, hereinafter referred to as The Mine). The Kombat Mine is located close to the Kombat Town on the southern margin of the Otavi Mountain Range in the Otjozondjupa Region. Located about 41km east of Otavi on the B8 Road to Grootfontein, the Mine is a past-producing copper, lead and silver Mine 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. Thus, an ECC for underground works needs to be applied for and obtained from the Environmental Commissioner upon completion of and approval the EIA Study.

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Contact Person: Ms. Fredrika Shagama +264 (0) 61 259 530 Telephone:

fshagama@edsnamibia.com/public@edsnamibia.com

APPENDIX C2: EIA CONSULTATION MEETING MINUTES AND ATTENDANCE REGISTER



Physical Address: 112, Robert Mugabe Avenue, Windhoek
Postal Address: PO Box 997154 Maerua Mall, Windhoek

Email: info@edsnamibia.com Web: www.edsnamibia.com

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.	Mr. G. H. Eggert (Farm Altona – Kombat South): (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)	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.
	(b) The depth of dewatering should be provided in the documents.(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.	(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.
2.	Mr. M. Spitze (Private Metallurgist): (a) How much water would be pumped out during mining on a monthly basis? We would like to know especially from neighbouring farmers' perspective. (b) What effect would the dewatering have on the water levels? (b) Will Trigon continuing with the old Tailings storage facility?	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. (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 (c) There is an ongoing construction of a new TSF. Therefore, we will use this advanced facility.
3.	Mr. B. Kawana (Community Member):	Ms. Fredrika Shagama (EDS Consultant): Yes, the management, mitigation and rehabilitation measures will be provided in the EMP for implementation by Trigon during the

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

No.	Comment / Issue / Question or Concern	Name of Responder & Response:
5.	Mr. L. Kamunima: Can the local hydropower project also be	Ms. Fredrika Shagama (EDS Consultant): (a) We will present
	considered for water supply?	this to Trigon for consideration and see if they can help.
6.	Mr. E. Beukes (Kombat Resident): How will dewatering affect	Ms. Fredrika Shagama (EDS Consultant): There will be
	the water quality for end consumers?	mitigation measures for implementation to avoid water pollution.
7.	Mr. Ritter: On laws and regulations, how will the community and	Ms. Fredrika Shagama (EDS Consultant): The ECC usually
	farmers be assured that the ministries such as MEFT and MAWLR	comes with conditions, and one of the conditions will include
	will monitor EMP compliance?	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.
		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.
8.	Mr. K. Utale (Otavi Town Council): We are currently getting	Mr. Janna Lusse (Trigon Mining Namibia): This is a bit of
	treated water from NamWater. I would like to seek clarity and	confusion from preceding questions on groundwater pollution
	prevent confusion on the issue of after mine closure, the Town	monitoring and compliance. Therefore, NamWater would not
	Council would be responsible for water treatment? Is that so?	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.	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	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. 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.
10	 Ms. R. Mbango (Kombat Settlement Office- Administrator): (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. (b) Will the mine line the oxidation ponds as they are not currently lined? 	Mr. Janna Lusse (Trigon Mining Namibia): (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. (b) Yes, this is already in progress.
11	Ms. S. Adrian (Otavi Town Council): What are the main hazardous waste that are likely to be generated from the mining and related activities?	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

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.

FINAL REMARKS AND CONCLUSION OF THE MEETING

Conclusion and Closing Remarks by the Environmental Consultant (EDS): 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.

The meeting was adjourned at 12h35.



Public / Stakeholders' Consultation Meeting Attendance Register

PROJECT: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED UNDERGROUND

Proponent: Trigon Mining Namibia (Pty) Ltd Venue: Old Get Course Club huse, Lambet Date: 1460 24 Jenuary 2023

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PROJECT: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED DEWATERING OF THE

Proponent: Trigon Mining Namibia (Pty) Ltd

Venue: Old Golf Course dub hat Kombat Date: Theoday, 24 known 2023

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APPENDIX C3: EIA COMMENTS AND ISSUES /
CONCERNS AS RECEIVED - UNDERGROUND
EXPLORATION AND MINING



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 todays 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 empoyed by Kombat but will remain in the area without finding employment.
- The situation with the dumppit of household refuse at Kombat.

We aprreciate receiving protocoll 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 Effected 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 veriKied 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 Fillemon Aupokolo Aupokolof@namwater.com.na 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 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 letterreferring 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. TheResidents of Kavango location were informed that they will be relocated before mining activities commence, which was not done. So as a results few houses were damaged by flying rocks duringblasting. Some community members were compensated an amount less than N\$ 20 000.00 andhouses 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.

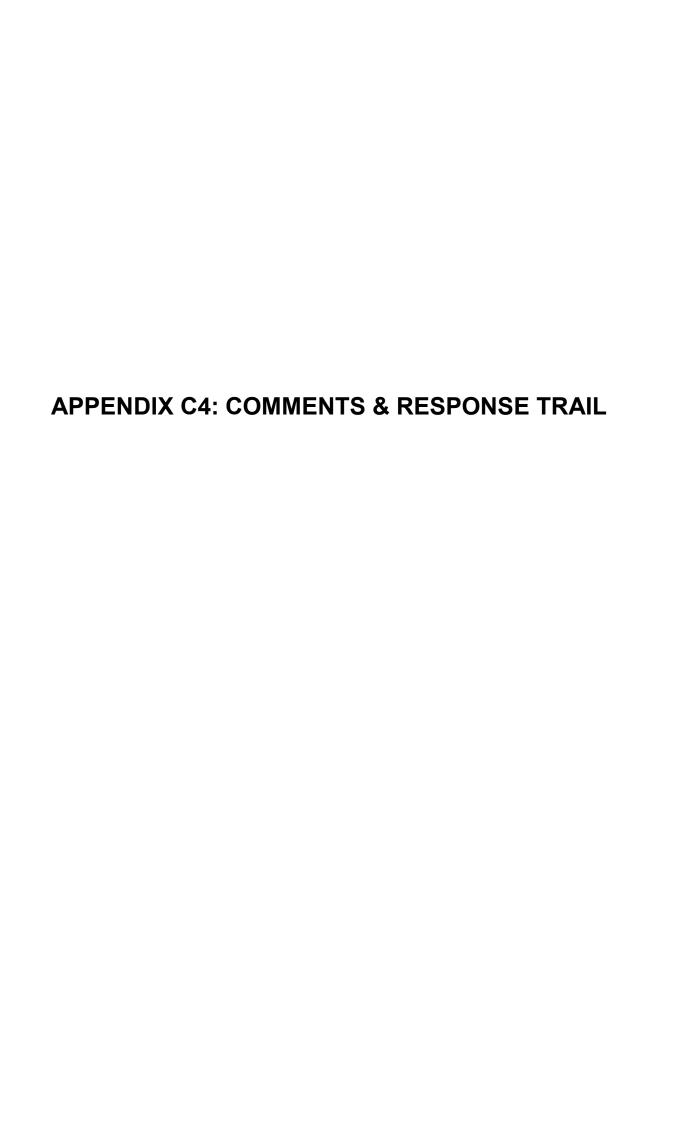
I am speaking on	behalf of my fellow	community living ir	n Kombat old locatio	on and I am Iookin	gforward to replies.

Yours sincerely,

Jonas Sheenya









COMMENTS & RESPONSE TRAIL

ENVIRONMENTAL IMPACT ASSESSMENT STUDIES FOR THE PROPOSED UNDERGROUND EXPLROATION & MINING 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,	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
Date & Mode of		
Communication		
Hartmut and Jenny Freyer,	I am not sure whether this is the right channel, however an EIA needs to	EDS Consultants: Trigon has indicated that they have been trying their
29 December 2022 via	be done urgently and action needs to be taken urgently for the new	best to fence off the dumping site for some time but the issue of vandalism
email	dumping site of Kombat town garbage. The location is absolutely	by some of the locals (removing the fence for their own use) has been a
	unsuitable as it is a spot where water collects from the mountains during	challenge. However, this has also been addressed in the EMP for Trigon
	rainy season. Now all this garbage and batteries lies in water and affects	to consider assisting the Settlement with better upgrade of the dumpsite
	the quality of drinking water for the Kombat town. Apart from this it is also	and have it environmentally cleared.
	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 lose their grazing for their cattle if fire is not contained speedily.	
Joachim Rust, 24 January	The unsustainable lowering of groundwater levels	EDS Consultants: The issue has been noted down and incorporated into
2023 via email		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



Name of Commenter,	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
Date & Mode of		
Communication		
	The uncontrolled influx of jobseekers that will not be employed by Kombat	EDS Consultants: This has been addressed in the EMP under the
	– but will remain in the area without finding employment.	planning and design phase.
	The situation with the dumppit of household refuse at Kombat.	EDS Consultants: This has also been addressed in the EMP for Trigon
	The situation with the dumppit of household refuse at Kombat.	
		to consider assisting the Settlement with better upgrade of the dumpsite
		and have it environmentally cleared.
Mark von Maltzahn, 27	Tailings water/waste water site. It is critically important that all Mining	EDS Consultants: Noted. The new tailings facility is being constructed
January 2023, via email (2-	activities must be carried out in accordance with best mining principles to	and its design and installation are according to the international standards.
page letter)	minimise environmental disturbance and pollution. The proposed waste	However, there are also monitoring systems incorporated into the facility
	water/ tailings dam site can be an issue for the surroundings with Wind	to ensure that it is effective and that any malfunction over time is detected
	and weather spreading dust etc. The old mining dump from past Mining	on time for prompt action to prevent pollution.
	activities is a bad example of this.	
	Downstream water pollution from mining activities. It is critically important	EDS Consultants: Noted and recommended for implementation.
	that all mining activities must be carried out by using best mining practices	
	to ensure that the environmental damage/consequences are minimised	
	Underground blasting. This effects the surrounding areas. Historically	EDS Consultants: The underdoing blasting compared to surface has very
	there have been sand and dirt influxes into the surrounding water pumps	little to no contact with the external environment (close-environment
	on the farms.	underground) for sand and dirt influxes to get into the surface/outside
		environment. Therefore, the impact significance is very low, therefore,
		negligible.
	Water quality and monitoring. This has to be monitored and reported to	EDS Consultants: Groundwater monitoring (water quality) will be
	the surrounding communities. Arsenic and Cyanid are just some of the	conducted for the Mine as prescribed in the EMP.
	chemicals that come to mind. Mining activities use a lot of chemicals to	conducted for the white as presented in the Livil .
	extract. Care must be taken that these chemicals/substances do not	
	pollute the environment	
	Politic the environment	
	Mining rehabilitation. Historically mines have a terrible footprint on the	EDS Consultants: This has been well noted and incorporated into the
	environment. This can be seen with the old tailings dam that was never	EMP (under Rehabilitation). Although, this EIA Study is for underground
		mining, the surface infrastructure such as the tailings facility will be
	I.	I .



Name of Commenter,	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
Date & Mode of		
Communication		
	rehabilitated. It is critically important that the Mine must be responsible for	associated with the copper ore mined from underground and processed
	rehabilitation even when it closes down.	on the surface (processing plant). Therefore, this has been noted for
		recommendation and implementation.
	Environmental Management Plans. All affected parties and communities	EDS Consultants: Noted. The EMPs will also be shared with the affected
	must be included and updated regularly.	parties as part of the consultation process.
	Environmental Audits. All affected parties and communities must be	EDS Consultants: Noted. Trigon Community Liaison or Public Relations
	included and updated regularly	Officer will also be responsible for sharing Environmental Audit Reports
		will with the affected parties when and as required as part of the
		compliance check by the affected parties.
	Responsible authorities have to monitor and control to ensure that the	EDS Consultants: Noted. This will be communicated to affected parties,
	Environment is not adversely affected. All affected parties have to be	from the ECC issuance and permits associated with the underground
	informed of all decisions and processes by the relevant authorities.	activities, particularly the Groundwater Abstraction permit
Mr. J. Sheenya, 18	I am a resident of Kombat who have been living here since 2012. I am	Trigon Mining: The Kavango location would not be influenced by the
January 2023 via email	hereby writing this letter referring to what will happen to the community	proposed shaft dewatering and underground exploration and mining
(letter)	living at the old location housing unit located within the mining area.	activities.
	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 happen to the	
	residents living within the mining area?	
Ms. J. Kamburona, 18	Once the mine is in operation again, the water abstracted from the current	EDS Consultants: The concern has been well noted for consideration and
January 2023 via email	source will increase. This increase abstraction might have an impact on	incorporated under the respective sections of the EIA Report and EMP
	NamWater boreholes in the vicinity. Kindly consider this impact during the	(Tables of mitigation measures under the Groundwater component)
	assessment.	



Name of Commenter,	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)
Date & Mode of Communication		
Mr. G. H. Eggert (Farm Altona – Kombat South), 24 January 2023 in the Consultation meeting, Kombat	 (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) (b) The depth of dewatering should be provided in the documents. (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. 	EDS Consultants: (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. (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.
Mr. M. Spitze (Private Metallurgist), 24 January 2023 in the Consultation meeting, Kombat	(a) Will Trigon continuing with the old Tailings storage facility?	Mr. Janna Lusse (Trigon Mining Namibia): (a) There is an ongoing construction of a new TSF. Therefore, we will use this advanced facility.
Mr. B. Kawana (Community Member), 24 January 2023 in the Consultation meeting, Kombat	 (a) Are there contingency plans for addressing negative impacts listed in the BID and plans for environmental rehabilitation throughout the project phases? (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. 	EDS Consultants: Yes, the management, mitigation and rehabilitation measures will be provided in the EMP for implementation by Trigon during the 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 regrowth). 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.



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Name of Commenter,	Comment/Concern/Issue	Response by EDS Consultants (and or Trigon Mining Namibia)			
Date & Mode of					
Communication					
Mr. G. H. Eggert (Farm	(a) EDS should advise the Proponent to come up with a Rehabilitation	EDS Consultants: These have been well noted for incorporation into the			
Altona - Kombat South),	Plan through a Fund at the ministry to cater for post-mining rehabilitation.	EMP. And yes there is provision for water supply to the local farmers,			
24 January 2023 in the	(b) Is there provision for local farmers for water supply as well as	Kombat and community projects.			
Consultation meeting,					
Kombat	community projects?				
Hombat					
Mr. L. Kamunima, 24	Can the local hydropower project also be considered for water supply?	Ms. Fredrika Shagama (EDS Consultant): (a) We will present this to			
January 2023 in the		Trigon for consideration and see if they can help.			
Consultation meeting,					
Kombat					
Mr. E. Beukes (Kombat	How will dewatering affect the water quality for end consumers?	EDS Consultants: There will be mitigation measures for implementation			
Resident), 24 January		to avoid water pollution.			
2023 in the Consultation					
meeting, Kombat					
Mr. Ritter, 24 January	On laws and regulations, how will the community and farmers be assured	EDS Consultants: The ECC usually comes with conditions, and one of			
2023 in the Consultation	that the ministries such as MEFT and MAWLR will monitor EMP	the conditions will include Trigon ensuring that they submit Bi-Annual			
meeting, Kombat	compliance?	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.			
		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.			
		Short to do the right to enoure their logacy as a company.			
Mr. K. Utale (Otavi Town	We are currently getting treated water from NamWater. I would like to seek	Mr. Janna Lusse (Trigon Mining Namibia): This is a bit of confusion from			
Council), 24 January 2023	clarity and prevent confusion on the issue of after mine closure, the Town	preceding questions on groundwater pollution monitoring and compliance.			
in the Consultation	Council would be responsible for water treatment? Is that so?	Therefore, NamWater would not expect the Town Council to take over the			
meeting, Kombat		water treatment even after mine closure.			



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Ms. S. Andrian (Otavi Town Council), 24 January 2023 in the Consultation meeting, Kombat	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	EDS Consultants: 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. 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.			
Ms. R. Mbango (Kombat Settlement Office- Administrator), 24 January 2023 in the Consultation meeting, Kombat	(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. (b)Will the mine line the oxidation ponds as they are not currently lined?	Mr. Janna Lusse (Trigon Mining Namibia): (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. (b) Yes, this is already in progress.			
Ms. S. Adrian (Otavi Town Council), 24 January 2023 in the Consultation meeting, Kombat	What are the main hazardous waste that are likely to be generated from the mining and related activities?	EDS Consultants: These type of waste conclude used fuels, oils, and grease as well as potential chemicals/additives used at the processing plant to process the ore. Fine materials blown by the wind from uncovered TSF would also pose a health risk.			