



# Environmental Scoping Assessment (ESA) Study Report:

The Proposed Prospecting and Exploration Activities on Exclusive Prospecting License (EPL) No. 8788 situated west of Uis Settlement in the Erongo Region, Namibia - <u>An Application for Environmental Clearance Certificate (ECC)</u>



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**Proponent:** 

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## DOCUMENT INFORMATION

Title: Environmental Scoping Assessment (ESA) Study Report for the Proposed Prospecting and Exploration Activities on Exclusive Prospecting License (EPL) No. 8788 situated west of Uis Settlement in the Erongo Region, Namibia – An Application for Environmental Clearance Certificate (ECC)

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# **SERJA' STATEMENT OF INDEPENDENCE**

As the Appointed Environmental Consultant to undertake the Environmental Scoping Assessment (ESA) Study for the proposed prospecting and exploration activities on EPL-8788 situated west of Uis Settlement in the Erongo Region, Serja Hydrogeo-Environmental Consultants cc declare that we:

- do not have, to our knowledge, any information or relationship with Mr. Tarah Hainana (the Proponent), the Ministry of Environment, Forestry and Tourism (MEFT)'s Department of Environmental Affairs and Forestry (DEAF) or the Competent Authority (Ministry of Mines and Energy (MME) that may reasonably have potential of influencing the outcome of this Environmental Assessment and the subsequent Environmental Clearance Certificate (ECC) applied for.
- have knowledge of and experience in conducting environmental assessments, the Environmental Management Act (EMA) No. 7 of 2007 and its 2012 Environmental Impact Assessment (EIA) Regulation as well as other relevant national and international legislation, guidelines, policies, and standards that govern the proposed project as presented herein.
- have performed work related to the ECC application in an objective manner, even if the results in views and findings or some of these may not be favorable to the Proponent.
- have complied with the EMA and other relevant regulations, guidelines and other applicable laws as listed in this document.
- declare that we do not have and will not have any involvement or financial interest in the undertaking/implementation of the proposed project, other than remuneration (professional fees) for work performed to conduct the ESA and apply for the ECC in terms of the EIA Regulations' requirement as an Environmental Assessment Practitioner (EAP).

**Disclaimer:** Serja Hydrogeo-Environmental Consultants will not be held responsible for any omissions and inconsistencies that may result from information that was not available at the time this document was prepared and submitted for evaluation.

FAShayama

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#### Signature:

Fredrika N. Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Date: April 2023

## EXECUTIVE SUMMARY

Tarah Hainana (hereinafter referred to as the Proponent) has applied to the Ministry of Mines and Energy (MME) for the rights to explore on Exclusive Prospecting Licence (EPL) No. 8788 on the 04<sup>th</sup> of March 2022. The approval of the application is however subject to an Environmental Clearance Certificate (ECC) and submit to the MME for consideration.

The Proponent intends to prospect and explore for mineral commodities within EPL-8788 (Base & Rare Metals, Dimension Stone, Industrial Minerals, Nuclear Fuels and Precious Metals). The EPL covers an area of 19,902.62 hectares (ha) and located about 65km west of Uis and immediate west of the Brandberg Mountain in the Erongo Region. The EPL falls within the Tsiseb Conservancy, and bordering the Dorob National Park.

#### Proposed Project Activities

The project will be carried out using two groups of techniques:

- Non-invasive technique (Desktop Study). During the prospecting and exploration phase, the vital components include reviewing existing reports and composite stratigraphic, lithological-geochemical maps of the targeted areas to identify prospective lithostratigraphic packages. In addition to the literature review, fieldwork (lithological (soil/rock) mapping and sampling) will be conducted to verify desktop work. These works do not require physical disturbance.
- Invasive techniques (Detailed exploration): This will entail the verification of information collected during the desktop study and survey and obtain more/detailed information about the EPL. The invasive techniques include soil sampling, trenching, and drilling.

#### Communication with I&APs, and Means of Consultation Employed

Communication with I&APs with regards to the proposed development was facilitated through the following means and in this order:

- A Background Information Document (BID) containing brief information about the proposed project was compiled and hand delivered to the Ministry of Environment, Forestry and Tourism (MEFT) accompanying the ECC application, and uploaded on the MEFT (ECC) Portal for project registration and shared with registered Interested and Affected parties (I&APs).
- A Stakeholders' (I&AP) List was developed and updated as new I&APs register for the ESA.
- Project Environmental Assessment notices were published in The Namibia Media Holdings' *Market Watch newspapers* (*Allgemeine Zeitung*, *Die Republikein, and Namibian Sun*) dated 31 January and 07 February 2023. The consultation period ran from the 31st of January 2023 to the 28th of February 2023.
- Due to the fact that the EPL is remotely located about 65km from Uis and other communities, consultation meetings were only scheduled and held with key local stakeholders (land custodians)

in Uis, i.e., the Daure-Daman Traditional Authority and Tsiseb Conservancy management on the 17<sup>th</sup> of March 2023 and 18 March 2023 in Uis. Consultation meeting minutes were taken.

• Two A3 size posters were pasted at the Daure-Daman Traditional Authority and Uis frequented Supermarket (Brandberg Multisave).

Some key potential positive and negative impacts were identified by the Environmental Consultant and based on issues and comments submitted by the I&APs.

**Impact Assessment:** The key negative impacts were described, assessed. The potential negative impacts indicated a medium rating significance. To minimize the significance, appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers to avoid and/or minimize their significance on the environmental and social components. The effective implementation of the recommended management and mitigation measures accompanied by monitoring will particularly see the reduction in the significance of adverse impacts that cannot be avoided completely (from medium rating to low).

#### **Conclusions**

The public was notified as required by Section 21 to 24 of the EIA Regulations by placing adverts in three newspapers (*Allgemeine Zeitung, Die Republikein, and Namibian Sun*) dated 31 January 2023 and 07 February 2023. Two consultation meetings with directly affected and key stakeholders were held in Uis on the 17<sup>th</sup> and 18<sup>th</sup> of March 2023. The stakeholders made some comments to the proposed project activities.

The comments were addressed and incorporated into this Report and Draft EMP.

The Scoping assessment (ESA) Study was deemed sufficient and concluded that no further detailed assessments are required to the ECC application for the prospecting and exploration activities.

Serja Consultants are confident that the potential negative impacts associated with the proposed project activities can be managed and mitigated by the effective implementation of the recommended management and mitigation measures and with more effort and commitment put on monitoring the implementation of these measures.

It is therefore, recommended that the proposed prospecting and exploration activities be granted an Environmental Clearance Certificate, and provided that:

- All the management and mitigation measures provided herein are effectively and progressively implemented.
- All required permits, licenses and approvals for the proposed activities should be obtained as required. These include permits and licenses for land use agreements, services provision agreements (water provision) to explore and ensuring compliance with these specific legal requirements.

- The Proponent, their project workers or contractors comply with the legal requirements governing their project and its associated activities and ensure that project permits and or approvals required to undertake specific site activities are obtained and renewed as stipulated by the issuing authorities.
- Site areas where exploration activities have ceased are rehabilitated, as far as practicable, to their pre-exploration state. This includes the levelling of stockpiled topsoil, backfilling of exploration trenches and closing/capping of exploration holes.

To maintain the desirable rating and that the potential impacts are under control, the implementation of management and mitigation measures should be monitored by their Environmental Control Officer (ECO) and audited by an Independent Environmental Consultant on a bi-annual basis. The monitoring of this implementation will not only be done to maintain the reduce impacts' rating or maintain low rating but to also ensure that all potential impacts that might arise during implementation are properly identified in time and addressed immediately.

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**Appendix B**: The Copy of Environmental Clearance Certificate (ECC) Application submitted to the Ministry of Mines and Energy (Competent Authority) and uploaded on the ECC Portal - <u>attached hereto</u>

**Appendix C:** Draft Environmental Management Plan (EMP) - <u>uploaded separately on the Portal as</u> <u>required (under "Proof of Public Consultation" file)</u>

**Appendix D:** Consent Letters from the Daure-Daman Traditional Authority and Tsiseb Conservancy - <u>attached hereto</u>

**Appendix E:** EIA Notification in the newspapers (*Allgemeine* Zeitung, *Die Republikein* and *Namibian Sun*) - <u>uploaded separately on the Portal as required (under "Proof of Public Consultation" file)</u>

**Appendix F:** Minutes from the Consultation Meetings with stakeholders / interested & affected parties (I&APs) - <u>uploaded separately on the Portal as required (under "Proof of Public Consultation" file)</u>

Abbreviation	Meaning
AHIA	Archaeological & Heritage Impact Assessment
BID	Background Information Document
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CSR	Corporate Social Responsibility
DEAF	Department of Environmental Affairs and Forestry
EAP	Environmental Assessment Practitioner

## LIST OF ABBREVIATIONS

Meaning
Environmental Clearance Certificate
Environmental Impact Assessment
Environmental Management Act
Environmental Management Plan
Exclusive Prospecting License
Environmental Scoping Assessment
Government Gazette
Government Notice
Interested and Affected Parties
International Finance Corporation
Ministry of Agriculture, Water and Land Reform
Ministry of Environment, Forestry and Tourism
Ministry of Mines and Energy
Namibian Association of CBNRM (Community-based Natural Resource Management) Support Organisations
National Heritage Council (NHC) of Namibia
Personal Protective Equipment
Regulation
Section

# GLOSSARY (KEY TERMS) AS ADOPTED FROM EXCEL DYNAMIC SOLUTIONS

Term	Definition
Alternative	A possible course of action, in place of another that would meet the same purpose and need of the proposal. Baseline - Work done to collect and interpret information on the condition/trends of the existing environment.
Biophysical	The part of the environment that does not originate with human activities (e.g., biological, physical and chemical processes).
Cumulative Impacts / Effects Assessment	In relation to an activity, means the impact of an activity that in it may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.

Term	Definition
Decision-maker	The person(s) entrusted with the responsibility for allocating resources or granting
	approval to a proposal
Ecological Processes	Processes which play an essential part in maintaining ecosystem integrity. Four
	fundamental ecological processes are the cycling of water, the cycling of nutrients, the
	flow of energy and biological diversity (as an expression of evolution).
Environment	As defined in Environmental Management Act - the complex of natural and anthropogenic
	factors and elements that are mutually interrelated and affect the ecological equilibrium
	and the quality of life, including – (a) the natural environment that is land, water, and air;
	all organic and inorganic matter and living organisms and (b) the human environment that
	is the landscape and natural, cultural, historical, aesthetic, economic and social heritage
	and values.
Environmental Management Plan	As defined in the EIA Regulations (Section 8(j)), a plan that describes how activities that
(Draft EMP)	may have significant environments effects are to be mitigated, controlled, and monitored.
Exclusive Prospecting Licence	A license that confers exclusive mineral prospecting rights over land of up to 1000km <sup>2</sup> in
	size for an initial period of 3 years, renewable twice for a maximum of 2 years at a time.
Interested and Affected Party (I&AP)	In relation to the assessment of a listed activity includes - (a) any person, group of persons
	or organization interested in or affected by an activity; and (b) any organ of state that may
	have jurisdiction over any aspect of the activity. Mitigate - practical measures to reduce
	adverse impacts. Proponent – as defined in the Environmental Management Act, a person
	who proposes to undertake a listed activity. Significant impact - means an impact that by
	its magnitude, duration, intensity or probability of occurrence may have a notable effect
	on one or more aspects of the environment
Fauna and Flora	The animals and plants found in an area.
Mitigation	The purposeful implementation of decisions or activities that are designed to reduce the
	undesirable impacts of a proposed action on the affected environment
Monitoring	Activity involving repeated observation, according to a pre-determined schedule, of one
	or more elements of the environment to detect their characteristics (status and trends).
Proponent	Organization (private or public sector) or individual intending to implement a development
	proposal.
Public Consultation/Involvement	A range of techniques that can be used to inform, consult or interact with stakeholders
	affected by the proposed activities.
Protected Area	Refers to a protected area that is proclaimed in the Government Gazette according to the
	Nature Conservation Ordinance number 4 of 1975, as amended.

Term	Definition
Scoping	An early and open activity to identify the impacts that are most likely to be significant and require specialized investigation during the EIA work. Can, also be used to identify alternative project designs/sites to be assessed, obtain local knowledge of site and surroundings, and prepare a plan for public involvement. The results of scoping are frequently used to prepare a Terms of Reference for the specialized input into full EIA.

# 1 INTRODUCTION

## 1.1 Project Background and Location

Tarah Hainana (hereinafter referred to as the Proponent) has applied to the Ministry of Mines and Energy (MME) for the rights to explore on Exclusive Prospecting Licence (EPL) No. 8788 on the 04th of March 2022. The approval of the application is however subject to an Environmental Clearance Certificate (ECC) and submit to the MME for consideration as shown on the Namibia Mining Cadastre Map Portal ("pending ECC") <u>https://portals.landfolio.com/namibia/</u> - Figure 1-1.

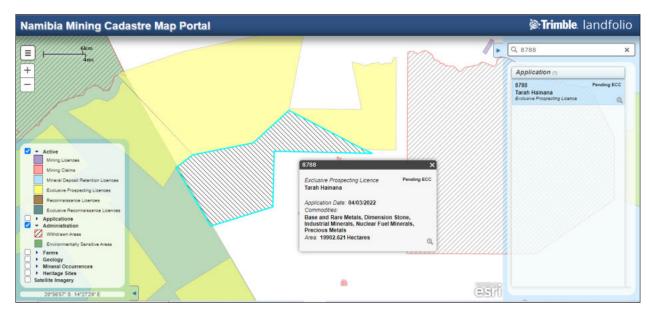


Figure 1-1: The status of EPL-8788 on the Namibia Mining Cadastre Map Portal (<u>https://portals.landfolio.com/namibia/</u>)

The Proponent intends to prospect and explore for mineral commodities within EPL-8788 (Base & Rare Metals, Dimension Stone, Industrial Minerals, Nuclear Fuels and Precious Metals). The EPL covers an area of 19,902.62 hectares (ha) and located about 65km west of Uis and immediate west of the Brandberg Mountain in the Erongo Region as shown on the locality map in Figure 1-2.

The EPL falls within the Tsiseb Conservancy, and bordering the Dorob National Park - Figure 1-3.

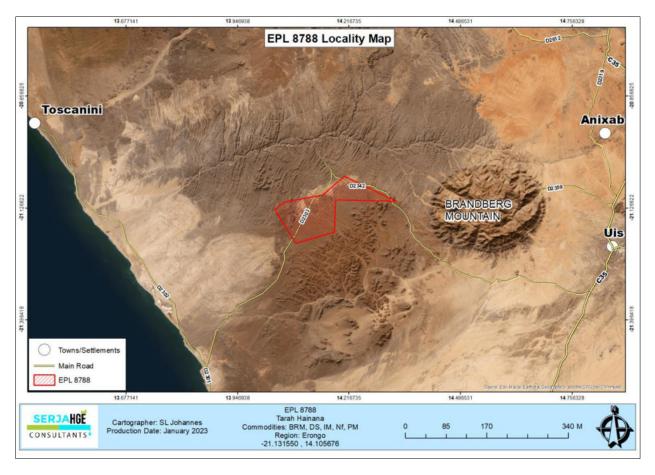


Figure 1-2: Locality Map of EPL-8788 west of Uis in the Erongo Region

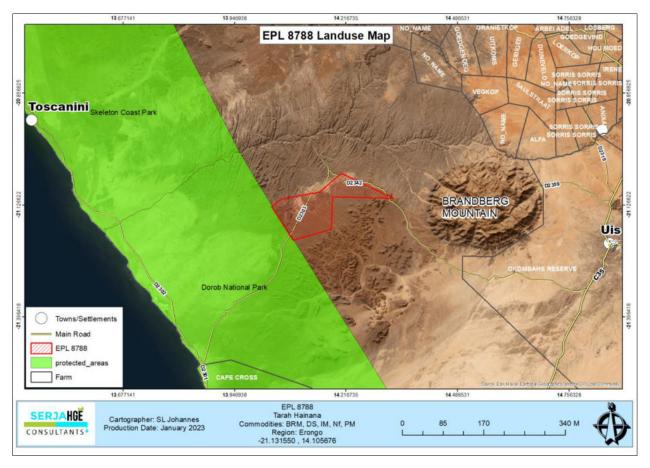


Figure 1-3: Locality Map with the significant land uses covered by EPL-8788

The approximate coordinates of the EPL are presented are as follows:

- Point A: 21°7'49" S 14°2'06" E
- Point B: 21°6'40" S 14°3'38" E
- Point C: 21°5'47" S 14°9'06" E
- Point D: 21°2'58" S 14°12'19" E
- Point E: 21°6'37" S 14°19'52" E
- Point F: 21°6'24" S 14°11'00" E
- Point G: 21°11'10" S 14°10'50" E
- Point H: 21°12'44" S 14°5'16" E.

## 1.2 The Need and Desirability of the Proposed Project

The Proponent is committed to contribute to the socio-economic development of Namibia through different industrial sectors, which includes mining that contributes about 12% towards the country's Gross Domestic Product (GDP). The proposed prospecting and exploration activities on EPL-8788 has great potential to enhance and contribute to the development of other sectors and its activities provide temporary employment, taxes and levies as well as social responsibilities. Additionally, the industry produces a trained workforce and small businesses that can serve communities and may initiate related businesses. The successful exploration on the EPL would then lead to the mining of economic feasible commodity(ies) based on the results of exploration. This would contribute towards achieving the goals of the national development plans such as the National Development Plan 5 (NDP5) and Harambee Prosperity Plans (HPPs) I and II. Mining is therefore, essential to the development goals of Namibia in contributing to meeting the ever-increasing global demand for minerals, and for national prosperity. Thus, the need for exploration activities.

## **1.3** The Need for an ESA and Environmental Clearance Certificate (ECC)

Prospecting, exploration of and mining of mineral resources is one of the listed activities in the Environmental Impact Assessment (EIA) Regulations (2012) of the Environmental Management Act (EMA) No. 7 of 2007 that may not be undertaken without an Environmental Clearance Certificate (ECC). The activities that are relevant to proposed project activities are as follows:

- 3.1 The construction of facilities for any process or activities which require a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).
- 3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.
- 3.3 Resource extraction, manipulation, conservation, and related activities.

The purpose of the ESA Study and subsequent issuance of the ECC is therefore to ensure that the proposed project activities are undertaken in an environmentally & socially friendly and sustainably manner, through the effective implementations of recommended environmental management measures to minimize the adverse identified impacts while maximizing the positive impacts.

## 1.4 Appointed Independent Environmental Consultant

To comply with the EMA and its Regulations and ensure environmental management, protection, and sustainability, the Proponent appointed Serja Hydrogeo-Environmental Consultants CC, Independent Environmental Consultants to apply for the ECC and conduct the required Environmental Assessment Process, which includes Public Consultation and prepare the Environmental Assessment Report and Management Plan (EMP).

The ESA process, including public consultation and engagement as well as compilation of the associated documents were conducted and compiled by Ms. Fredrika Shagama. Ms. Shagama is a qualified and experienced Hydrogeologist and Environmental Assessment Practitioner (EAP) by training and experienced with over 7 years' experience in Groundwater and Environmental Management Consulting. Her CV is attached to this Report as Appendix A.

## **1.5** Application for the Environmental Clearance Certificate

The application for the ECC process was done as follows:

- Preparation of prepared Background Information Document (BID) for the proposed project,
- Launching of the ECC application on the ECC Portal of the Ministry of Environment, Forestry and Tourism (MEFT) with the Proponent details (accompanied by the BID) for project registration purposes and obtaining a MEFT application / reference number (APP-000927),
- Completion of the Form 1 (Section 32) of the EIA Regulations with the required project and Proponent information,
- Submission of the printed hard copy of the ECC application (with affixed NAD300 revenue stamps as application fees) accompanied by the BID was submitted to the MEFT on the 27<sup>th</sup> of January 2023. The MEFT's date stamped copy of the ECC application (Appendix B) was uploaded on the ECC Portal as proof of application and payment.

The next component of the ECC application was to undertake an Environmental Scoping Assessment (ESA) process, which entails Baseline Assessment of the Biophysical and Social environments as well as Public Consultation & Engagement. The findings of the ESA process are then incorporated into an ESA Report and a Draft EMP is also developed for the mitigation of potential adverse impacts anticipated from the proposed project activities. The two documents and associated documents (appendices) are then submitted to the Environmental Commissioner at MEFT's Department of Environmental Affairs and Forestry (DEAF) for evaluation and consideration of the ECC.

## **1.6 Scope of Work and Report Contents**

This Study has been conducted according to the EMA No. 7 of 2007, and its 2012 EIA Regulations as mentioned in the preceding subsections, i.e., the proposed project may not be undertaken without an ECC. Therefore, the process has been undertaken as required and guided by the Regulations. Furthermore, the ECC is required by the MME for consideration to renew the expired EPL rights.

This Report has been compiled as a required output of an environmental assessment process after the ECC application has been submitted to the Competent Authority (MME). The ESA Report, together with the EMP and all its appendices will be submitted to the DEAF.

#### **Proposed Prospecting & Exploration Activities**

The document (Report) covers the following chapters or sections, in addition to the introductory chapter:

- Project description and associated activities (Chapter 2).
- Project alternatives considered (that were found to be environmentally friendly and technically feasible) Chapter 3).
- The Legal requirements governing the proposed project and its related activities, i.e., the legislations that the proposed project must comply with (Chapter 4).
- The Environmental and Social Baseline of the project area Chapter 5.
- The Public Consultation & Engagement Process undertaken to inform, invite and engage the public (stakeholders and interested & affected parties) on the proposed project- Chapter 6.
- The Assessment of identified potential impacts associated with the proposed project (Chapter 7) This chapter presents both the positive and negative (adverse) as well as cumulative impacts,
  assessment methodology and the assessment of the negative impacts. The mitigation measures
  in the form of management action plans, with timeframe and implementation responsibilities are
  given in Draft Environmental Management Plan (EMP) under Appendix C.
- The recommendations and conclusions to the environmental assessment are presented under Chapter 8. The data sources (literature/references) consulted for the assessment are listed under Chapter 9.

Based on the information provided by the Proponent and the EAP's experience, description of the project activities is presented under the next chapter.

# 2 DESCRIPTION OF THE PROPOSED PROJECT ACTIVITIES

Prior to mobilizing to site and undertaking any groundwork for the proposed activities at the site (EPL 7746), the Proponent will be required to sign land access and use agreements with the land custodians (the Daure-Daman Traditional Authority) and the land users (Tsiseb Conservancy). The consents of land use have been obtained from the two custodians and attached hereto as Appendix D.

## 2.1 Duration of Mineral Exploration

The exploration programmes are based on an iterative, results-driven and phased nature. Therefore, it is not possible at an early stage of exploration to give exact areas for future drilling or an exact duration of the exploration activities (Resilient Environmental Solutions, 2019). Soil sampling programmes for instance may last from between one week to a month at a time over specific areas, until the explored area is fully sampled as desired. Drilling programmes may initially range from two weeks to a month at a time, depending on the planned programme or based on the results of the programme. The Proponent undertakes to work with all relevant stakeholders to keep them informed of exploration progress to facilitate site visits and access to ongoing field exploration programmes.

In general terms, the minerals exploration activities can take up to a maximum of seven years, with different projects at various stages of the exploration phase (Resilient Environmental Solutions, 2019).

The Proponent intends to adopt a systematic and standard prospecting and exploration approach for the 2 exploration categories of the commodities (Base & Rare metals, industrial minerals, Precious Metals and Dimension Stone) potentially occurring on the EPL. The exploration methods are presented under the subsections below.

# 2.2 Base& Rare Metals, Industrial Minerals, Nuclear Fuels and Precious Metals

#### 2.2.1 Prospecting Stage (Non-Invasive Technique)

This stage of the project is known as Non-invasive technique (Desktop Study). During the prospecting and exploration phase, the vital components include reviewing existing reports and composite stratigraphic, lithological-geochemical maps of the targeted areas to identify prospective lithostratigraphic packages. In addition to the literature review, fieldwork (lithological (soil/rock) mapping and sampling) will be conducted to verify desktop work. These works do not require physical disturbance.

Upon issuance of the ECC, prospecting during the advanced exploration phase will require the Proponent to assess the EPL area through detailed geological mapping, and geophysical surveys.

#### 2.2.1.1 Geophysical surveys

This will entail data collection of the substrata (in most cases service of an aero-geophysical contractor will be soured), by air or ground, through sensors such as radar, magnetic and electromagnetic to detect any mineralization in the area and are conducted to ascertain the mineralisation.

Ground geophysical surveys shall be conducted, where necessary using vehicle-mounted sensors or handheld by staff members, while in the case of air surveys the sensors will be mounted to an aircraft, which then flies over the target area.

These surveys (mapping and as supported by geophysics) are crucial in defining targets for test pitting, trenching, and drilling.

The exploration program will then commence with ground geophysical surveys. These surveys and associated activities are part of the exploration cycle in Figure 2-1.

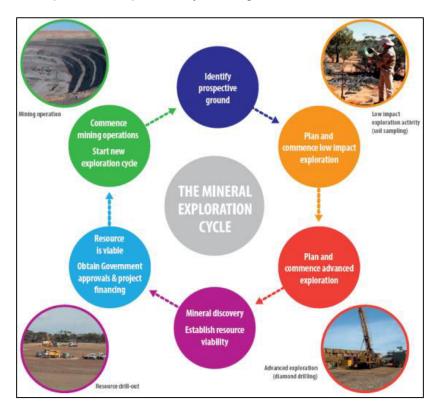


Figure 2-1: The Mineral Exploration Cycle (Excel Dynamic Solutions, 2021)

After a successful exploration activity, the EPL would be converted into a Mining License by submitting exploration results and an application to convert to the MME. Upon approval of the application by MME, feasibility study and full EIA Study (with an approved ECC for mining activities), the site would be prepared for mine development and actual mining and subsequent mine closure.

## 2.2.2 Planned Exploration Methods (Invasive Techniques)

This stage (Detailed Field Evaluation) following the Non-Invasive techniques will be carried out by simple collection of soil and rock samples from target EPL areas to verify desktop/non-invasive information. These detailed techniques will include activities and as described under subsection:

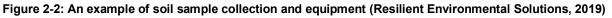
- Soil and rock sampling,
- Trenching, and
- Exploration drilling (Reverse Circulation (RC) and diamond drilling).

## 2.2.2.1 Lithology geochemical surveys

Rock and soil samples shall be collected and taken for trace element analysis to be conducted by analytical chemistry laboratories to determine if enough Base & Rare, Precious Metals or other minerals of interest are present. Also, trenches or pits may be dug depending on the commodity (in a controlled environment e.g., fencing off and labelling activity sites) adopting manual or excavator to further investigate the mineral potential.

Soil sampling consists of small pits (±20cm X 20cm X 30cm) being dug where 1kg samples can be extracted and sieved to collect 50g of material. As necessary, and to ensure adequate risks mitigation, all major excavations will either be opened or closed immediately after obtaining the needed samples or the sites will be secured until the trenches or pits are closed. At all times, the landowner/custodian and other relevant stakeholder will be engaged to obtain authorisation where necessary. A typical example of soil sampling in the field foe exploration is shown in Figure 2-2 below.





## 2.2.2.2 Detailed Exploration Drilling

Should analyses by an analytical laboratory be positive, holes are drilled, and drill samples collected for further analysis. This will determine the depth of the potential mineralization. If necessary new access tracks to the drill sites will be created and drill pads will be cleared in which to set up the rig. Two widely used drilling options may be adopted, these are either Reverse Circulation (RC) drilling and/or diamond-core drilling. RC drilling uses a pneumatic hammer, which drives a rotating tungsten-steel bit. The technique produces an uncontaminated large volume sample, which is comprised of rock chips. It is relatively quicker and cheaper when compared to other techniques like Diamond Drilling. However, diamond drilling may also be considered for this exploration programme, for better geological control and to perform processing trials.

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A typical drilling site will consist of a drill-rig and support vehicles as well as a drill core and geological samples store. A drill equipment parking and maintenance yard may be set up (including a fuel and lubricants storage facility). A typical example of drilling activities on active EPLs in Erongo and Omaheke Regions are shown in Figure 2-3 and Figure 2-4.



Figure 2-3: A-typical drill rig on an EPL (Resilient Environmental Solutions, 2019), B- drill rig on active EPL precious metals exploration site visited by the Author in Erongo Region (photo by Author, 2022)



Figure 2-4: A drill rig on an EPL in the Omaheke Region (Resilient Environmental Solutions, 2022)

## 2.3 Dimension Stone Exploration

The Proponent intends to adopt a systematic prospecting approach of the following:

- Non-invasive techniques: Geological mapping, reviewing of existing geological maps and historical drilling/quarrying data, Field evaluation and sampling, and
- Invasive techniques: Detailed exploration (Down-The-Hole drilling).

The proposed activities are summarized as follows.

## 2.3.1 Desktop Study

The exploration program will commence with a review of geological maps and historical drilling and/ or quarrying data for the area, if any.

## 2.3.2 Field Evaluation

The field evaluation is to be carried out by a qualified geologist, aimed at locating suitable host rock outcrops in the field from where the:

- General soundness (intactness).
- Appearance (patterns and colour), and
- Joint and vein spacing can be evaluated.

Small samples (about 30 cm<sup>3</sup> in dimension) will be removed for cutting and polishing to provide insights on whether the stone can be polished to an acceptable finish, as well as to give an indication of the hardness of the stone from a sawing and finishing point of view. Where field evaluation indicates a potentially economical viable deposit, detailed geological mapping will be conducted by means of mapping transversely across exposed / cleaned segments of the rock unit. Where cleaning of the rock unit is required to aid geological mapping, air compressors will be used to expose the rock. The mapping is aimed at delineating major geological structures such as fault and shear zones (zones of weakness), the extent of veins, as well as further delineation of fracture / discontinuity frequencies.

Collectively, field evaluation and detailed geological mapping will result in the production of a refined and detailed geological map for the targeted sites on the EPL.

#### 2.3.3 Detailed Exploration

The refined geological map would then assist in target generation for subsequent detailed exploration such as drilling and possibly test quarrying.

## 2.3.3.1 Feasibility Study: Exploration Component

Where exploration drilling yields positive results, small blocks will be obtained using the butterfly cutting method. This will be done to fully evaluate the recovery of the small saleable blocks, and better optimize the extraction methods, production rates and operational costs in future. The exploration test quarrying will only be carried out on select targeted areas of the EPL and shall be performed on as small areas as possible to minimize environmental impacts. The outcomes / results of the test quarrying will be recorded and archived by the Proponent for future use (when mining will be considered depending on the outcome of exploration).

It is important to note that the test quarrying referred to above is only a component of exploration activities, to be done at a very small-scale level on targeted sites of the EPL to enable the Proponent to get sufficient and reliable exploration data, but not for mining purposes. Therefore, this ESA process only covers exploration activities.

## 2.4 Project Resources and Services Infrastructure

The following services and infrastructure as provided below will be required for the project activities.

#### 2.4.1 Human resources

The prospecting stage will require but not limited to one or two geologists, GIS specialist, and geophysicist to collect the data. During the detailed (invasive) exploration stage, the project crew will consist of about 8 people, comprising 2 to 3 skilled (geologist and geotechnician), 2 semi-skilled, 4 or more casual workers (assistants). However, this number may vary depending on the actual workload and requirement onsite.

The workforce requirement will entail the need for geologist(s), drilling personnel, sampling team, supervisor / exploration manager, casual workers to clear the sites and perform other required jobs onsite, cleaner(s), machine operator, truck & light vehicle drivers, etc.

#### 2.4.2 **Project Crew Accommodation**

Exploration workers will be housed in prefabricated accommodation units (tented camps) during the exploration stage (within the EPL boundaries). However, prior to setting up the accommodation units, an agreement and a consent will need to be reached and signed between the Proponent and Tsiseb Conservancy.

The onsite accommodation is selected to ensure that the exploration crew commences with site work on time (early) and to prevent putting pressure on the local roads to transport workers to and from site daily (commuting).

#### 2.4.3 Project Equipment, Material, Machinery and Vehicles

The following equipment and machinery will be required for the exploration stage:

- A minimum of two (4X4) pickup trucks (vehicles), and heavy truck,
- Air compressor,
- Drill rigs, and drilling machines
- Down-The-Hole (DTH) drilling rig (for Dimension Stone exploration),
- Two-way radios (for communication),
- Water supply tanks with dispersion pipelines, and fuel bowser,

- Power generators (minimum two), and
- Biodegradable drilling fluids stored in manufacturers approved containers.

Equipment and vehicles will be stored at a designated area near the accommodation site (campsite), or a storage site established within the EPL site area.

### 2.4.4 Water Supply

During exploration onsite water will be required for cooling down and washing of equipment, exploration related activities such as drilling, test quarrying, domestic (drinking, cooking, and ablution). For exploration related activities such as cooking, drinking and personal use, about 300 litres of water will be required per week (1,200 litres per month). Exploration drilling, specifically diamond requires a lot of water, and it would require approximately 10,000 to 25,000 litres (10 to 25m<sup>3</sup>) per day, in instances where for example fractured formations are encountered) per hole during drilling.

To ensure that the already low potential local groundwater resources are not stressed or significantly impacted by the project activities such as drilling, the Proponent will be carting water from outside the area (where water supply is not an issue). The water will then be stored in relevant industry standard water storage tanks onsite that will be refilled as and when necessary.

## 2.4.5 Fuel supply (For Cooking)

The Proponent will provide a 10kg liquid gas cylinder to be used for food preparation by the site workers. Therefore, no project related firewood will be collected from the Conservancy.

#### 2.4.6 Fuel Supply (Machinery and Equipment)

Diesel will be used for machinery and equipment and fuel generator. A trailer mounted and bunded 10,000litre fuel tank will be onsite to ensure an interrupted fuel supply to the project activities.

#### 2.4.7 Accessibility (roads)

The EPL is accessible via the D2303 and D2342 that passes through EPL. Where necessary, and with the consent and guidance of the Tsiseb Conservancy management, few new access tracks will be created in some areas of the EPL to access the target sites for exploration and enable the movement of vehicles and drill rig.

#### 2.4.8 Waste management

The onsite waste types will be managed as follows:

• <u>Sewage</u>: Portable ablution facilities with septic tanks will be provided on site and emptied according to manufacturers' instructions.

- <u>General and domestic waste</u>: Sufficient waste bins (containers) will be availed at both exploration sites and campsites for waste storage. The waste containers will be emptied into the main onsite container for disposal at the nearest approved landfill site, upon reaching a waste disposal agreement with the Uis Settlement Council.
- <u>Hazardous waste</u>: All vehicles, machinery and fuel consuming equipment will be provided with drip trays to capture potential fuel spills and waste oils. The waste fuel/oils will be carefully stored in a standardized container to be disposed of at the nearest approved hazardous waste management facility such as Walvis Bay or Swakopmund.

#### 2.4.9 Health and Safety

The following measures will be implemented onsite to ensure safety and security:

- <u>Adequate and appropriate Personal Protective Equipment (PPE)</u> will be provided to every project personnel and visitor/inspector while on and working at site and visiting the site, respectively.
- <u>First aid</u>: A minimum of two first aid kits will be readily available at exploration and camp sites to attend to potential minor injuries, while major injuries will need to be attended to further by transporting the injured to the nearest health centre for treatment. At least 2 personnel will be trained on administer first aid.
- <u>Potential Accidental Fire Outbreaks</u>: As a control measure for accidental fire outbreaks, a basic firefighting equipment, i.e., a fire extinguisher will be readily available in vehicles, at the working sites and campsite (accommodation units). The site personnel will be trained on and provided with firefighting skills.
- <u>Open exploration trenches and boreholes:</u> The trenches dug for sampling will be temporary fenced
  off to prevent potential injuries of mainly wildlife in the area. Once sampling is completed, the
  trenches will be progressively backfilled and levelled and fencing removed for storage or donation
  to the land custodians for the communities. Similarly, for exploration boreholes that are no longer
  required after rock samples, they will be backfilled and closed off.

Warning signage at hazardous site areas such as open trenches will be erected.

## 2.5 Decommissioning and Rehabilitation of Disturbed Sites

Once the exploration activities on the EPL come to an end, the Proponent will need to put site rehabilitation measures in place. Decommissioning and rehabilitation are primarily reinforced through a decommissioning and rehabilitation plan, which consists of safety, health, environmental, and contingency aspects. The economic situation or unconvincing exploration results might force the Proponent to cease the exploration program before predicted closure. Therefore, it is of best practice for the Proponent to ensure the project activities are ceased in an environmentally friendly manner and site is rehabilitated by carrying out the following:

- Dismantling and removal of campsites and associated infrastructures from the project site and area,
- Carrying away all exploration equipment and vehicles, and
- Clean up of site working areas and transporting the recently generated waste to the nearby approved waste management facility (as per agreement with the facility operator/owner),

Further decommissioning and rehabilitation practice onsite will include:

- Backfilling of pits and trenches used for sampling,
- Closing and capping of exploration boreholes to ensure that they do not pose a risk to both people and animals in the area, and
- Levelling of stockpiled topsoil. This will be done to ensure that the disturbed land sites are left close to their original state as much as possible.

## 2.6 Post-Exploration Activities

After a successful exploration activity, the EPL would be converted into a Mining License by submitting exploration results and an application to the MME to convert the EPL into a Mining License. Upon preapproval of the application by MME, feasibility study and full EIA Study (with an approved ECC for mining activities), the approved area would be prepared for mine development and actual mining and subsequent mine closure.

The next chapter is the presentation different and relevant alternatives considered for the project activities.

# **3 PROJECT ALTERNATIVES**

Alternatives are defined as the "different means of meeting the general purpose and requirements of the activity" (EMA, 2007). This section will highlight the different ways in which the project can be undertaken and to identify the alternative that will be the most practical, but least damaging to the environment is identified.

Once the alternatives have been established, these are examined by asking the following three questions:

- What alternatives are technically and economically feasible?
- What are the environmental effects associated with the feasible alternatives?
- What is the rationale for selecting the preferred alternative?

The alternatives considered for the proposed project are discussed below.

## 3.1 The "No-Go" Alternative

The "no action" alternative implies that the status quo remains, and nothing happens. Should the proposal of exploration activities on the EPL, be discontinued, none of the potential impacts (positive and negative) identified would occur. If the proposed project is to be discontinued, the current land use for the proposed site will remain unchanged. This option was considered and a comparative assessment of the environmental and socio-economic impacts of the "no action" alternative was undertaken to establish what benefits might be lost if the project is not implemented.

Considering the above losses, the "no-action/go" alternative was not considered a viable option for this project.

## 3.2 Exploration Location

The prospecting/exploration location is dependent on the geological setting (regional and local), and economic geology. Therefore, finding an alternative location for this planned exploration activities for the specific commodities in the area is not possible. This means that the mineralization of the target commodities is area-specific, which means exploration targets are primarily determined by the geology (host rocks) and the ore-forming mechanism. The location of the EPL also depend on the availability of license areas that the different applicants and Proponents applied for and interested in (specific minerals).

Furthermore, the national mineral resources' potential locations are also mapped and categorized by the Ministry of Mines and Energy in exclusive prospecting licenses, mining licenses and claims, mineral deposit retention licenses, reconnaissance licenses and exclusive reconnaissance licenses. Available information on EPL-8788 and other licenses are available on the Namibia Mining Cadastral Map.

#### **Proposed Prospecting & Exploration Activities**

## 3.3 Exploration Methods

Both invasive and non-invasive exploration activities as indicated under the project description chapter are expected to take place. These were found to be appropriate and reliable for the type of commodities explored for. Other alternative viable exploration methods are found to achieve the purpose more effectively and/or efficiently without aggravating any environmental measures put in place, it can be implemented.

## 3.4 Services Infrastructure

Alternatives were considered for different supporting infrastructures to ensure that the most feasible options were selected. The technological, economic, and environmental limitations were considered to select the most feasible option. The alternative considered in this regard are presented in Table 3-1 below.

Category of	Alternatives Considered	Justification for selected option
Infrastructure		
Ablution facilities	Install fixed facility with septic tank	-To minimize rehabilitation costs portable facilities were
	-Portable facilities with septic tank	selected as the best option
Water supply	-Bring water from elsewhere	-The project water will be brought from elsewhere to
	-Abstract from site boreholes	minimize the impact on the local resources
Fuel storage	-Trailer mounted diesel tank	-During exploration use trailer mounted diesel tank for fuel
	-Fixed bunded fuel tank	storage due to great mobility requirements during exploration.
Power supply	-Diesel generator set and if considered,	-The diesel and or solar power are the most practical &
	solar power.	economically viable options for exploration (in case of no
	-Powerline (grid) supply	favourable results of exploration).
Offices,	-Erect dis-mantable prefabricated units	-Favoured due to: (a) Ease of installation, (b) Low
accommodation	-Fixed structures	installation costs and (c) Ease of dismantling & moving.
Accommodation site	-Setting up campsites tented campsite	-Set up temporary camps onsite (within the Conservancy),
	within the EPL	instead of commuting to and from Uis. The bad (gravel)
	-Commuting from Uis which is about	roads and time needed to travel to the EPL area, would
	65km away from the EPL.	affect the works and eventual productivity. Therefore onsite
	-	camp (for trenching and drilling crew) would be feasible. An
		agreement to set up camp should be made with the
		Conservancy.

The following chapter presents the national and international legal requirements that are applicable and relevant to project.

# 4 APPLICABLE LEGAL FRAMEWORK

The project's activities or some of them may be regulated and governed by certain legal or policies. Therefore, it is necessary to review and consider these legislations and legal requirements. These legal requirements are either on a local (institutional), national (Namibian) and international legislation, policies, guidelines, etc. This review serves to inform the project Proponent, Interested and Affected Parties, and the decision-makers at the DEAF of the requirements and expectations, as laid out in terms of these instruments, to be fulfilled to establish the proposed prospecting and exploration activities.

## 4.1 Environmental Management Act No. 7 of 2007

The Environmental Management Act No.7 of 2007 and its 2012 EIA Regulations aims to ensure that the potential impacts of the development on the environment are considered carefully and in good time; that all interested and affected parties have a chance to participate in the environmental assessments and that the findings of the environmental assessments are fully considered before any decisions are made about activities which might affect the environment.

The Act aims at promoting sustainable management of the environment and use of natural resources. The Environmental Management Act (EMA) is broad; it regulates land use development through environmental clearance certification and/or Environmental Impact Assessments. The Act provides for the clearance certification for "*mining and quarrying activities*".

# 4.2 Minerals (Mining & Prospecting) Act No. 33 of 1992

The most applicable Sections to the project are as follows:

- Section 54 requires written notice to be submitted to the Mining Commissioner if the holder of a mineral license intends to abandon the mineral license area.
- Section 68 stipulates that an application for a mineral license shall contain the particulars of the condition of, and any existing damage to, the environment in the area to which the application relates and an estimate of the effect which the proposed prospecting operations may have on the environment and the proposed steps to be taken to prevent or minimize any such effect.
- Section 91 requires that rehabilitation measures should be included in an application for a mineral license.

**Implication for the proposed project:** The Proponent should carry out an assessment of the impact on the receiving environment. The Proponent should include as part of their application for the EPL, measures by which they will rehabilitate the areas where they intend to carry out exploration activities.

Other applicable legal framework and policies relevant to the proposed project are presented in

Table 4-1.

Legislation / Policy /	Relevant Provisions	Implications for the project activities
Guideline		
The Constitution of the	The Constitution of the Republic of Namibia (1990 as	By implementing the environmental
Republic of Namibia,	amended) addresses matters relating to environmental	management plan, the establishment
1990 as amended	protection and sustainable development. Article 91(c)	will be in conformant to the constitution
	defines the functions of the	in terms of environmental management
	Ombudsman to include:	and sustainability.
	"the duty to investigate complaints concerning the over- utilisation of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia"	Ecological sustainability will be main priority for the proposed development.
	Article 95(I) commits the state to actively promoting and maintaining the welfare of the people by adopting policies aimed at the:	
	"Natural resources situated in the soil and on the subsoil, the internal waters, in the sea, in the continental shelf, and in the exclusive economic zone are property of the State."	
Nature Conservation	National Parks are established and gazetted in	
Amendment Act, No. 3 of	accordance with the Nature Conservation Ordinance,	
2017	1975 (4 of 1975), as amended. The Ordinance provides a	
	legal framework with regards to the permission of entering a state protected area, as well as requirements for individuals damaging objects (geological, ethnological, archaeological, and historical) within a protected area. Though the Ordinance does not specifically refer to mining as an activity within a protected area (PA) or recreational area (RA), it does restrict access to PA's and prohibits certain acts therein as well as the purposes for which permission to enter game parks and nature reserves may be granted.	The Proponent will be required to enhance the conservation of biodiversity and the maintenance of the ecological integrity of protected areas and other State land

Table 4-1: List of applicable le	gislation for the proposed pros	specting and exploration a	ctivities on the EPL
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Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
The Parks and Wildlife Management Bill of 2008	Aims to provide a regulatory framework for the protection, conservation, and rehabilitation of species and ecosystems, the sustainable use and sustainable management of indigenous biological resources, and the management of protected areas, to conserve biodiversity and to contribute to national development.	
Traditional Authority Act (Act No. 25 of 2000):	The Act also stipulates that Traditional Authorities (TAs) should ensure that natural resources are used on a sustainable basis that conserves the ecosystem. The implications of this Act are that TAs must be fully involved in the planning of land use and development for their area. It is the responsibility of the TA's customary leadership, the Chiefs, to exercise control on behalf of the state and the residents in their designated area.	The EPL considered under this project is within the predominantly communal land under the Daure-Daman Traditional Authority (TA). Therefore, they should be consulted for the land use consent and engagement should continue throughout the Project.
Mine Health & Safety Regulations, 10 <sup>th</sup> Draft	Makes provision for the health and safety of persons employed or otherwise present in mineral licenses area. These deal with among other matters; clothing and devices; design, use, operation, supervision, and control of machinery; fencing and guards; and safety measures during repairs and maintenance.	The Proponent should comply with all these regulations with respect to their employees.
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001)	Regulation 3(2)(b) states that "No person shall possess [sic] or store any fuel except under authority of a licence or a certificate, excluding a person who possesses or stores such fuel in a quantity of 600 litres or less in any container kept at a place outside a local authority area"	The Proponent should obtain the necessary authorisation from the MME for the storage of fuel on-site.
The Regional Councils Act (No. 22 of 1992)	This Act sets out the conditions under which Regional Councils must be elected and administer each delineated region. From a land use and project planning point of view, their duties include, as described in section 28 "to undertake the planning of the development of the region for which it has been established with a view to physical, social and economic characteristics, urbanisation patterns, natural resources, economic development potential, infrastructure, land utilisation pattern and sensitivity of the natural environment.	The relevant Regional Councils are I&APs and must be consulted during the Environmental Assessment (EA) process. The project site falls under the Erongo Regional Council; therefore, they should be consulted.
Water Act 54 of 1956	The Water Resources Management Act 11 of 2013 is presently without regulations; therefore, the Water Act No 54 of 1956 is still in force:	The protection (both quality and quantity/abstraction) of water resources should be a priority.

Legislation / Policy / Guideline	Relevant Provisions	Implications for the project activities
	Prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duly of care to prevent pollution (S3 (k)).	Relevant permits and or agreements to abstract and use water should be applied for and obtained.
	Provides for control and protection of groundwater (S66 (1), (d (ii)).	
	Liability of clean-up costs after closure/abandonment of an activity (S3 (I)). (I)).	
Water Resources Management Act (No 11 of 2013)	The Act provides for the management, protection, development, use and conservation of water resources; and provides for the regulation and monitoring of water services and to provide for incidental matters. The objects of this Act are to:	
	Ensure that the water resources of Namibia are managed, developed, used, conserved and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (Section 68).	
National Heritage Act No. 27 of 2004	To provide for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.	The Proponent should ensure compliance with these Acts requirements. The necessary management measures and related permitting requirements must be taken.
The National Monuments Act (No. 28 of 1969)	The Act enables the proclamation of national monuments and protects archaeological sites.	This done by the consulting with the National Heritage Council of Namibia. A Chance Finds Procedure provided to the Draft EMP should be implemented upor discovery of archaeological and heritage resources.
Soil Conservation Act (No 76 of 1969)	The Act makes provision for the prevention and control of soil erosion and the protection, improvement and conservation of soil, vegetation and water supply sources and resources, through directives declared by the Minister.	Duty of care must be applied to soil conservation and management measures must be included in the EMP.
Forestry Act (Act No. 12 of 2001	The Act provides for the management and use of forests and forest products.	The proponent will apply for the relevant permit under this Act if it becomes necessary.

Legislation / Policy /	Relevant Provisions	Implications for the project activities
Guideline		
	Section 22. (1) provides: "Unless otherwise authorised by this Act, or by a licence issued under subsection (3), no person shall on any land which is not part of a surveyed	
	erven of a local authority area as defined in section 1 of the Local Authorities Act, 1992 (Act No. 23 of 1992) cut, destroy or remove - (a) vegetation which is on a sand dune or drifting sand or on a gully unless the cutting, destruction or removal is done for the purpose of stabilising the sand or gully; or (b) any living tree, bush or shrub growing within 100 m of a river, stream or watercourse."	
Public Health Act (No. 36 of 1919)	Section 119 states that "no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health."	The Proponent and all its employees should ensure compliance with the provisions of these legal instruments.
Public and Environmental Health Act No. 1 of 2015	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	
Health and Safety Regulations GN 156/1997 (GG 1617)	Details various requirements regarding health and safety of labourers.	
AtmosphericPollutionPreventionOrdinance(1976)	This ordinance provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, apart from East Caprivi, is proclaimed as a controlled area for the purposes of section 4(1) (a) of the ordinance.	The proposed project and related activities should be undertaken in such a way that they do not pollute or compromise the surrounding air quality. Mitigation measures should be put in place and implemented.
Hazardous Substance Ordinance, No. 14 of 1974	The ordinance provides for the control of toxic substances. It covers manufacture, sale, use, disposal and dumping as well as import and export. Although the environmental aspects are not explicitly stated, the ordinance provides for the importing, storage, and handling.	The Proponent should handle and manage the storage and use of hazardous substances on site so that they do not harm or compromise the site environment

Legislation / Policy /	Relevant Provisions	Implications for the project activities
Guideline		
Road Traffic and Transport Act, No. 22 of 1999	The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters incidental thereto.	Mitigation measures should be provided for, if the roads and traffic impact cannot be avoided, the relevant permits must be applied for.
Labour Act (No. 6 of 1992)	Ministry of Labour, Industrial Relations and Employment Creation is aimed at ensuring harmonious labour relations through promoting social justice, occupational health and safety and enhanced labour market services for the benefit of all Namibians. This ministry insures effective implementation of the Labour Act No. 6 of 1992.	The Proponent should ensure that the prospecting and exploration activities do not compromise the safety and welfare of workers.

# 4.3 International Policies, Principles, Standards, Treaties and Conventions

Given the fact that the proposed project is likely to be partly funded by international investors and the financing require the project to comply with certain requirements. Therefore, it is crucial to include the relevant legal requirements in this ESA Study and these are listed below:

- Equator Principles (EP):
  - EP1: Review and Categorization
  - o EP2: Environmental and Social Assessment
  - EP 3: Applicable Environmental and Social Standards
  - EP 4: Environmental and Social Management System and Equator Principles Action Plan
  - EP5: Stakeholder Engagement
  - EP6: Grievance Mechanism
  - EP7: Independent Review
  - EP8: Covenants
  - EP9: Independent Monitoring and Reporting
  - EP10: Reporting and Transparency.
- International Finance Corporation (IFC) Performance Standards (PS):
  - PS1: Assessment and Management of Environmental and Social Risks and Impacts
  - PS2: Labour and Working Conditions
  - o PS3: Resource Efficient and Pollution Prevention and Management
  - o PS4: Community Health and Safety
  - PS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement

- PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS7: Indigenous Peoples/Sub-Saharan African Historically Undeserved Traditional Local Communities
- PS8: Cultural Heritage
- PS9: Financial Intermediaries (FIs)
- PS10: Stakeholder Engagement and Information
- The United Nations Convention to Combat Desertification (UNCCD) 1992
- Convention on Biological Diversity 1992
- Stockholm Declaration on the Human Environment, Stockholm (1972)

Other relevant international Treaties and Protocols ratified by the Namibian Government are:

- Convention on International Trade and Endangered Species of Wild Fauna and Flora (CITES), 1973.
- Convention on Biological Diversity, 1992, and
- World Heritage Convention, 1972.

In addition to the project description, alternatives, and legal framework, it is also important to note that the proposed project activities will be undertaken in a specific environment, in terms of biophysical and social. Therefore, understanding these existing environmental features before the project activities, is crucial for the assessment of the potential impacts stemming from the project activities on the features.

# 5 BIOPHYSICAL AND SOCIAL BASELINE

The proposed exploration activities will be undertaken in specific environmental and social conditions. Therefore, understanding the pre-project conditions of the environment will aid in describing the status quo versus future projections of environmental conditions once the project is implemented. The baseline information also aids in identifying the sensitive environmental features and how best suitable management and mitigation measures can be recommended for implementation. The summary of selected biophysical and social baseline information about the project area is given below.

The baseline information presented below is sourced from site visit, online sources ranging from old reports, books and publishing as well as other relevant research information in the broader area. The project baseline that is deemed necessary to the project activities are as follows.

# 5.1 Biological Environment

According to Erongo Regional Council (2015), the hyper-arid Namibian coastal ecosystem is home to a significant and unique array of biological and ecological diversity, including uniquely adapted plants and animals, rich estuarine fauna and a high diversity of migratory shore and seabirds. Namibia's coastal zones are considered as refuge for several of endangered species.

### 5.1.1 Fauna

In terms of fauna, the area is homes to wildlife such as Elephant, black rhino, leopard, cheetah, mountain zebra, kudu, gemsbok, ostrich, springbok, steenbok, black-backed jackal, klipspringer (NACSO, 2023). The faunal species expected to occur on-site are expected to occur in similar habitats within the wider project area.

There were no observed wildlife during the site visit, but this does not imply their absence, as this would be due to the time limit spent by the Environmental Consultant on site, time of the day when the site visit was done when animals were probably seeking shelter in far vegetation and rock outcrops. There were however, some wild animal prints on the eastern side of the EPL, along the D2342 - Figure 5-1.



Figure 5-1: Animal prints along the D2342 side of the EPL

### 5.1.2 Flora

The EPL area is found within two vegetation structure types, namely the Namib grassland and sparse shrubland as shown on the map in Figure 5-2.

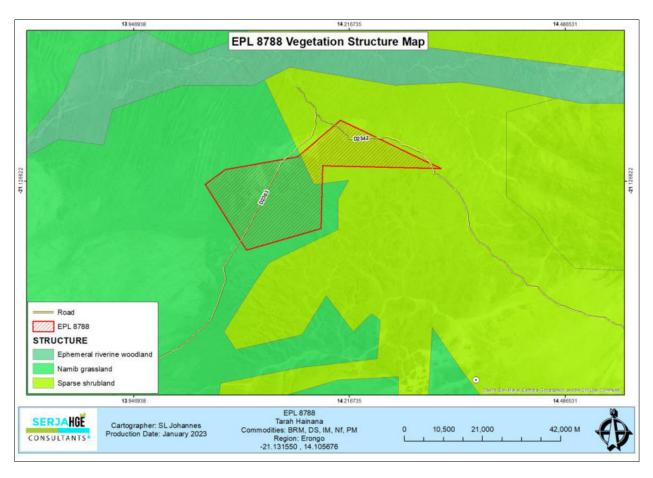


Figure 5-2: Dominant vegetation map within and around the EPL

Based on the site visit conducted on 18 March 2023, the following plants were observed onsite and surroundings (as per Figure 5-3):

- Scattered smelly shepherds' shrubs (Boscia albitrunca and foetida),
- Welwitschia plants (*Welwitschia mirabilis*, Protected) within the EPL and common elsewhere in the surroundings,
- Fairly common bushes of *Commiphora kraeuseliana*, *Commiphora virgate*, *Commiphora Wildii*, *Hoodia montana* bushes (all Protected species),
- Few shrubs of Acacia (Vachellia) reficiens (red-bark acacia, red thorn or false umbrella thorn), and
- Sparsely distributed Stipagrostis grasses, and Euphorbia species such as Damarana, etc.)

The EPL is covered by sparse vegetation comprising of grass in some areas, shrubs and young trees of the above-listed species as shown by photos in Figure 5-3.

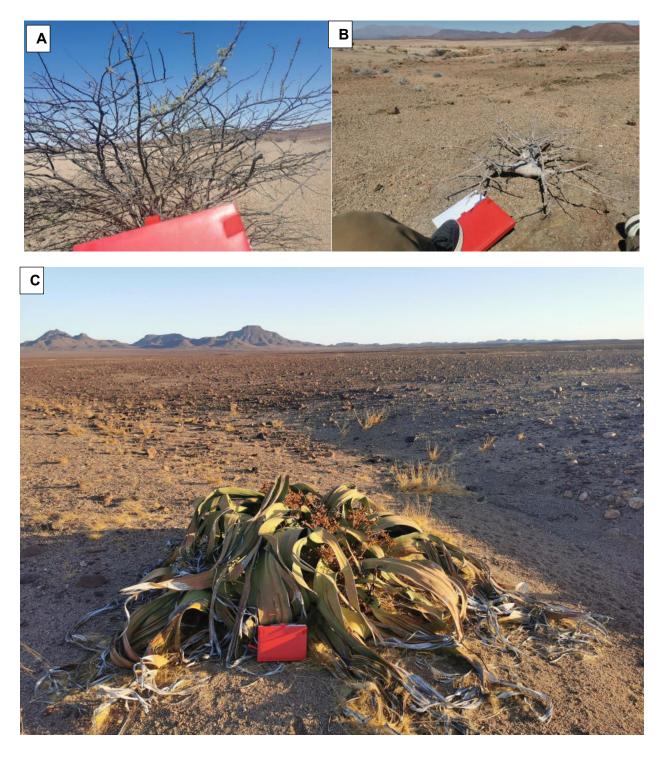


Figure 5-3: Some of the vegetation observed in the EPL area (A – Acacia reficiens, B- Commiphora species and C – Welwitschia with some grass cover)

# 5.2 Physical Environment

### 5.2.1 Climate

The climatic conditions of the area overlain by the EPL are described using the information sourced from Mendelsohn *et al* (2002) as presented below. The EPL area and surrounding areas receives an average annual rainfall between 50 and 150mm as shown on the map in Figure 5-4 below.

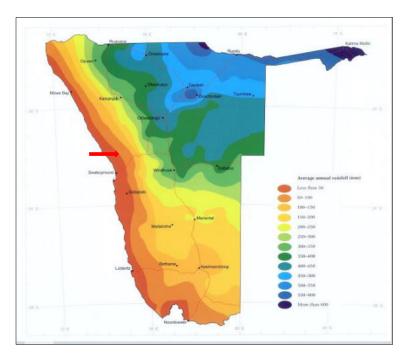


Figure 5-4: The annual rainfall for the project area (Mendelsohn et al., 2002)

# 5.2.1.1 Temperatures

The annual temperatures of the project area range between 16 and 22°C (Figure 5-5), and minimum ranging from 16 to 20°C and maximum temperatures ranging from 22 to 32°C (Figure 5-6).

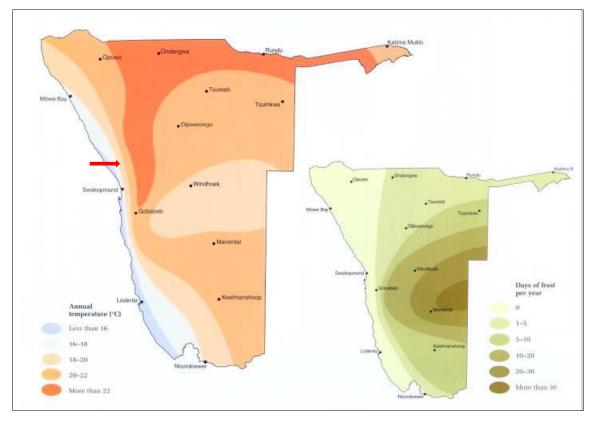


Figure 5-5: The annual temperatures for the project area (Mendelsohn et al., 2002)

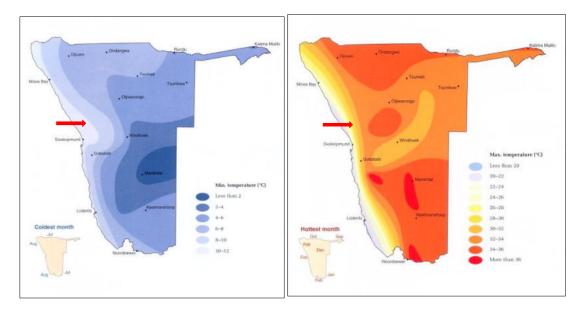


Figure 5-6: The minimum and maximum temperatures for the project area (Mendelsohn et al., 2002)

### 5.2.2 Landscape and Topography

The EPL is mainly within the Coastal Plains Landscape (Figure 5-7). The Central-Western Plains landscape stretches back from the coast. A coastal plain is a flat, low-lying piece of land next to the ocean. Coastal plains are separated from the rest of the interior by nearby landforms, such as mountains<sup>1</sup>.

The EPL is situated in a flat area with some hills and mountains. The elevations range between 0 and 547 meters above sea level as shown on topographic map in Figure 5-7.

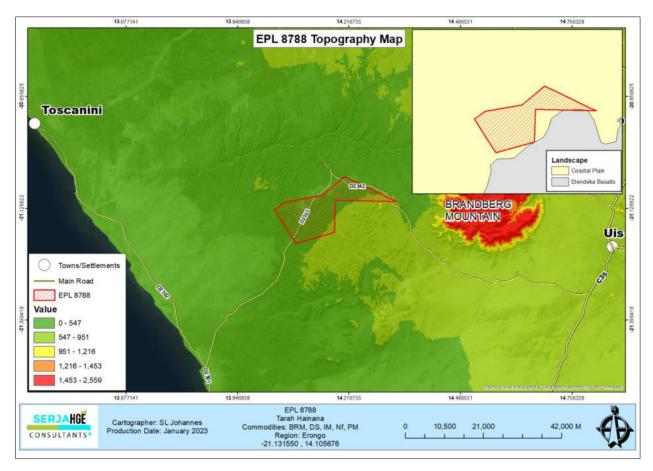
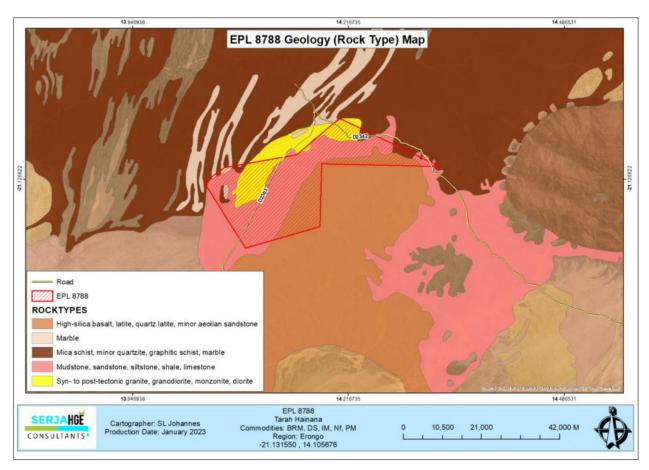


Figure 5-7: The topography and landscape of the EPL area

# 5.2.3 Geology and Soils

The EPL falls within the Damara Granites and Swakop Group geological groups (Mendelsohn *et al.*, 2002). The typical rock outcrops and units occurring within the EPL (as shown in Figure 5-8: local geological and immediate surroundings map) are mudstone, sandstone, siltstone, basalt, shale, limestone, schists, quartzite, marble, granite, granodiorite, and diorite.

<sup>&</sup>lt;sup>1</sup> National Geographic. (2023). Education - Coastal plain <u>https://education.nationalgeographic.org/resource/coastal-plain/</u>



The geological settings of the area (the rock units and their nature to potentially host ores of the sought commodities) triggered the need to prospect and explore within the EPL.

Figure 5-8: The geology of the EPL and surrounding project area

The project site area is characterized by outcrops of visibly weathered granite, sandstone, dolerite and marble as shown in Figure 5-9.



Figure 5-9: The rock units comprising marble, dolerite, sandstone, and granite observed within the EPL

In terms of soil, EPL-8788 is mainly overlain by eutric regosols, partly leptic leptosols and a very small part overlain by rock outcrops as shown on the dominant soil map in Figure 5-10. The eutric regosols are medium or fined textured soils of actively eroding landscape, the thin layers lying directly above the rock surfaces from which they formed. Although not as shallow as the leptosols, these soils never reach depths of more than 50 cm. The central regions of the country are dominated by regosols, which are especially susceptible to erosion where there is any degree of slope. The vegetation cover on these thin soils is generally sparse because they cannot provide most plants with sufficient water or nutrients. The areas with eutric regosols can support low-density stock farming or wildlife (Mendelsohn *et al*, 2002).

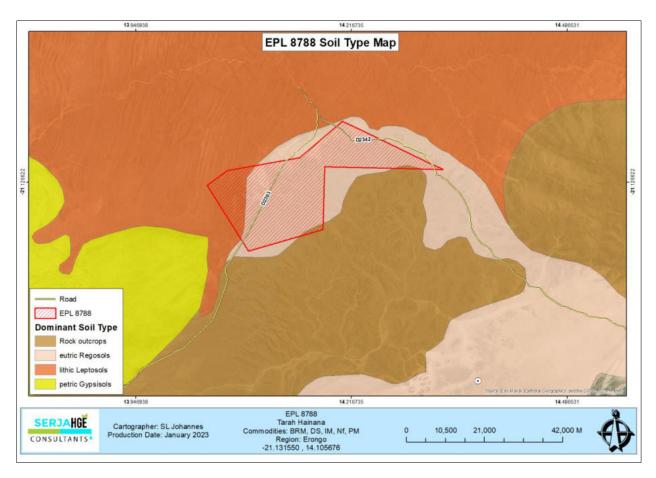


Figure 5-10: The dominant soil types found within the EPL

Typical soil found within the EPL are light brown and reddish brown sandy gravel with sparse grass cover - Figure 5-11.



Figure 5-11: Typical soils observed in the EPL area

### 5.2.4 Water Resources: Groundwater (Hydrogeology) and Surface water (Hydrology)

With regards to groundwater (hydrogeology), the EPL is mainly covered by the rock bodies with little groundwater potential as shown on the map in Figure 5-12. Porous aquifers can only only found along major ephemeral rivers such as Ugab and others in the area. The low/little groundwater potential in the EPL area is attributed to the low rainfall (inflcunded by the arid climate), type of rock units underlying the EPL and their non-fractured/faulted nature that limit the storage, transmission, and flow of groundwater. Therefore, the local rocks are not good aquifers (groundwater resources).

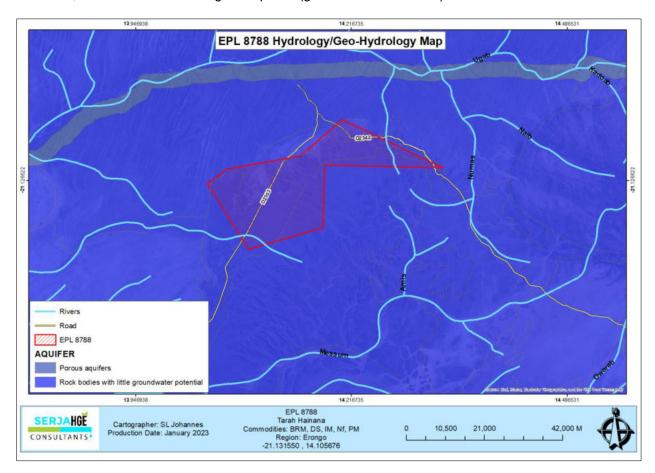


Figure 5-12: The surface and groundwater map of the EPL area

# 5.3 Social and Economic Environment

### 5.3.1 Demography

The Erongo Region has a population of 150,809 people, accounting to a 7.1% of the country's total population of Namibia of 2,104,900 in 2011. The population density for the Region was 2.7 people per square kilometres (Namibia Statistics Agency, 2014).

The EPL site falls within the Daures Constituency which had a population of 11,350 in 2011.

### **Proposed Prospecting & Exploration Activities**

### 5.3.2 Economic Activities

According to the Erongo Regional Council (2015), the economy of the Erongo Region mainly depends on mining, fishing, agriculture, and tourism. The fishing industry is the third largest economic sector contributed about 6.6% to the Gross Domestic Product (GDP). The Region's whole eastern part and certain western parts are characterized by livestock farming on commercial farms in the districts of Karibib, Usakos and Omaruru, and in the communal areas (Erongo Regional Council, 2015).

According to the Namibia Statistics Agency (2014), the main source of income in households in the Erongo Region comes from farming (3%), wages and salaries (73%), cash remittance (5%), business and non-farming (9%) and pension (8%).

### 5.3.2.1 Agriculture

According to the, from the 2000 statistics, the Erongo Region accommodated more than 110,000 goats, nearly 36,000 heard of cattle, and about 50,000 sheep. Cattle from commercial and communal farmers can be marketed to the national abattoir and processing facility, Meatco (Erongo Regional Council, 2021).

The economic activities practiced in the Daures Constituency are farming (livestock and game) and tourism. The farming involves livestock and tourism is centered on eco-tourism, game drive and trophy hunting on commercial farms inland. There are no farming nor agricultural activities within or near the EPL area.

### 5.3.2.2 Exploration and Mining

The mining activities are undertaken near mining towns of Arandis and settlements such as Uis, Omatjete where commonalities such as nuclear fuels (Uranium), Dimension Stone (marble and granite), Base & Rare Metals (Copper), Precious Metals (Gold) and Industrial Minerals, etc. are mined. There are other active EPLs around EPL-8788, whereby exploration works may or may not be undertaken currently. Please refer to the map in Figure 5-13 for neighbouring EPLs, and mining claims within the Tsiseb Conservancy.

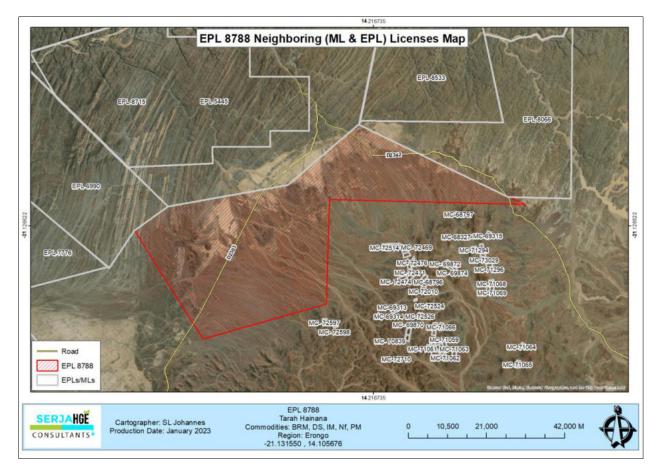


Figure 5-13: The mineral license around EPL-8788

### 5.3.2.3 Tourism

With regards to tourism, the Erongo Region offers some of the most spectacular and popular tourist destinations as well as a variety eco-, wildlife, cultural and adventure tourism opportunities. The EPL area is mainly aimed for tourism purposes.

### 5.3.3 Infrastructure and Services

The Erongo Region has good coverage of services and infrastructure. This includes a good road network from the central areas of the country and many access roads, tarred and untarred. The power is supplied either through ErongoRed in the coastal and central western areas of the Region.

There is also a good water reticulation system in both towns/village/settlements and rural (farm) areas. The water is mainly supplied through water supply schemes operated by NamWater either through boreholes (direct borehole or treated water) such as Omaruru Delta Aquifer Scheme for Omaruru Town and private boreholes on farms.

The summary of current services infrastructure in and around Uis and to the EPL area include:

- **Water supply**: Water is supplied from moderate and low yielding solar powered boreholes on farms and the Uis area and possibly nearby water users are supplied from NamWater Scheme.
- **Power supply:** The broader areas such as towns and settlements (including Uis) are supplied by ErongoRed regional electricity provider. Some areas (including some farms) depend on solar energy and generators for power supply.
- **Road network:** The project area is connected to the inland areas by the C36 until Uis. The EPL is accessible via the D2303 and D2342, thus, providing direct access to the EPL.

### 5.3.4 Land Uses: Conservancies

The EPL is found in the Tsiseb Conservancy, which is bordered to its northern side by Doro nawa Conservancy, to the northeast by Sorris Sorris as shown in Figure 5-14. The EPL area has no community but the area serves a tourism area. According to the zonation map of the Conservancy, the EPL falls within a Sensitive Zone. Therefore, extra care will need to be taken during exploration, with the guidance of the Conservancy management.

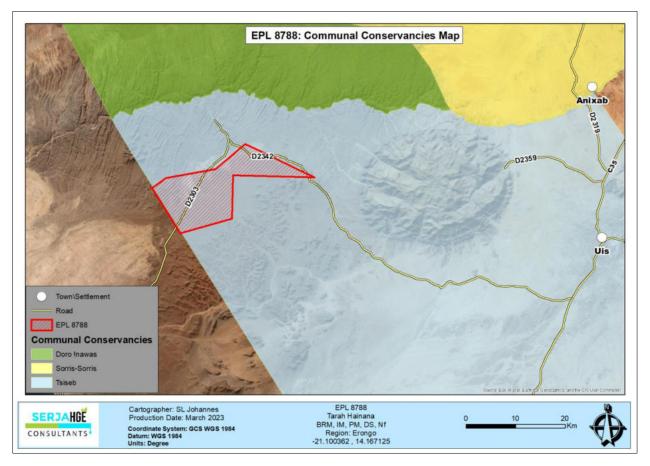


Figure 5-14: The land uses on and around EPL-8788

#### The Tsiseb Conservancy

Named after the Tsiseb Gorge in which the White Lady rock painting is located, the Tsiseb Conservancy is located in an arid area with average annual rainfall of less than 100 mm. The geographical features include rolling or flat landscape in which the Brandberg massif stands out. The Ugab River forms the northern border. Other particular significant features include Brandberg (Namibia's highest mountain which has an abundance of rock art including the famous White Lady), Ugab River, Omaruru River and Messum Crater (NACSO, 2023). The major wildlife occurring in the Conservancy include Elephant, black rhino, leopard, cheetah, mountain zebra, kudu, gemsbok, ostrich, springbok, steenbok, black-backed jackal, klipspringer.

# 5.4 Archaeology and Heritage Aspect

### 5.4.1 Regional Context

An Archaeological & Heritage Impact Assessment (AHIA) was carried out for the EPL by a qualified and experienced Archaeologist (Mr. Roland Mushi of TARO Archaeology Consultants, 2023). The site assessment was conducted on the 18<sup>th</sup> of March 2023 and a Report compiled thereto. The baseline information, assessment and mitigation measures provided presented herein and in the Drat EMP have been sourced from the AHIA Report which is submitted to the National Heritage Council (NHC) for evaluation and consideration of the Heritage Consent for EPL-8788.

The summary of the AHIA findings are provided herein as follows.

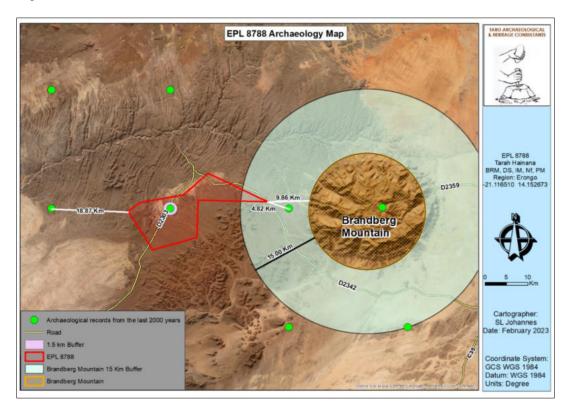
According to Mushi (2023), researchers over the past several decades have reported an abundance of archaeological data from the Namib and the surrounding region. As a result, there is a reasonably good understanding of the Namib's long and complex cultural history. The early and middle Holocene prehistory of the Namib is better developed relative to earlier periods and a larger number of sites have been excavated and dated (e.g. Kinahan 1991, Wadley 1993), particularly for the well-known rock art sites of the Brandberg Massif (e.g. Richter 1991; Breunig 2003) and the Kaokoveld of northwest Namibia (Vogelsang & Eichorn 2011). The pre-history of Daureb/Brandberg has revealed that a long archaeological sequence that covers the Middle Stone Age and Later Stone Age (Breunig 2003), rock art (Scherz 1975; Lenssen-Erz 2001) the evidence of pastoral nomads (Kinahan, 1991) as cited by Mushi, 2023).

### 5.4.2 Local Perspective

Related archaeological, cultural and historical research around the Brandberg area suggested that Early Stone Age (LSA), Middle Stone Age (MSA), Late Stone Age (LSA), and according to Wim and Breunig (1999) what was branded as Brandberg Culture (BBC) and historical material, covering the period from about one million years ago to the present, can be found in the entire landscape. A few sites were located, including examples with stone tools (plenty of surface scatters close to Brandberg and its associated landscapes), outcrops and boulders, rock shelters and historic remains.

On the whole, the findings fitted into the already known patterns of the prehistoric and cultural heritage activities within this landscape. However, the sites are very sparse and mostly in an open terrain interrupted by isolated hills, outcrops, boulders and mountains with limited solitary findings, especially on the last portion close to Dorob National Park.

This particular EPL is partially situated within the 15km radius of Brandberg Mountain's buffer zone, more specifically in the western direction of Brandberg and the eastern direction of the EPL - Figure 5-15. Therefore, to address this from an archaeological and heritage point of view, the portion that is inside the 15 km buffer zone will be excised from the EPL (about 6km of EPL area) to ensure no encroachment toward the protected zones of the Brandberg area is taking place, the topographical map and satellite imagery below (figure 12), depicts the distance from the archaeological sites, Brandberg Mountain and the provides the coordinates for satellite identified sites as well as the entire buffer zones from both sides i.e. the Brandberg and the EPL boundaries.

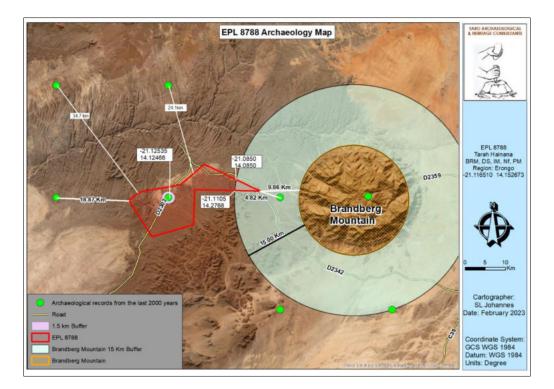




The map in Figure 5-16 shows the point and coordinates at which the EPL 8788 touches the protected areas that form the 15km radius buffer zone for Brandberg including its protected range and surrounding terrains. The Table 5-1 depicts the points at which the EPL is inside the buffer zone and the length (portion) that will be excised so as to not disturb the archaeologically sensitive areas as reported in the AHIA (Mushi, 2023).

The point where the buffer zone touches the EPL	Coordinates of the exact points (DMS)
Northern boundary (-21.0850, 14.0850)	S 21 <sup>0</sup> 05' 60" and E 14 <sup>0</sup> 05 60"
Southern boundary (-21.1105, 14.2788)	S 21 <sup>0</sup> 06' 37.8" and E 14 <sup>0</sup> 16' 43.68"
Archaeological site in the middle (-21.12535, 14.12468)	S 21 <sup>0</sup> 07' 31.26" and E 14 <sup>0</sup> 07 46.85"

#### Table 5-1: The points at which the EPL is inside the buffer zone and the length (portion) that will be excised



# Figure 5-16: Buffer zone map created for the protection of heritage resources around Brandberg (Mushi, 2023)

Summary of Archaeological findings within the EPL are listed below (and description of these findings are presented in the AHIA Report:

- Rock shelters/caves/outcrops and boulders
- Observed areas with hut settlements/occupation/hunting blind spot
- Grave sites/stone cairns
- Rock outcrops and boulders
- Stone artefacts and other related lithic features

**5.4.3 Geospatial Map for Archaeological, Historical, Heritage Findings and Buffer Zones** The surveyed areas or sites within the EPL 8788 categorized as the findings in the AHIA Report, with regards to their levels of sensitivity in archaeological and heritage contexts, the buffer zones have been created surrounding the sites that need to be preserved and protected in situ (Figure 5-17). Some of the findings are outside the EPL's boundaries but their occurrences are worth mentioning, documenting and mapping accordingly as far as the NHC Guideline 2021 is concerned (Mushi, 2023).

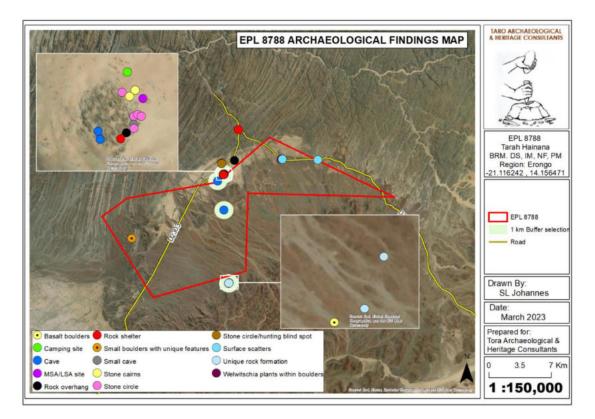


Figure 5-17: Depiction of clusters of the recorded archaeological and heritage resources in the surveyed areas of EPL 8788 (Mushi, 2023)

The public consultation and engagement process and means employed for the EPL ESA Study is presented under Chapter 6.

# **6 PUBLIC CONSULTATION AND PARTICIPATION PROCESS**

Public consultation and participation form an important component of an EIA process. It provides potential Interested and Affected Parties (I&APs) and stakeholders with an opportunity to comment on and raise any issues relevant to the project for consideration as part of the assessment process. This greatly assist the EAP (Environmental Consultant) to thoroughly identify and record potential impacts and to what extent further investigations are necessary. Public consultation can also aid in the process of identifying possible mitigation measures. The consultation for this project has been done under the EMA and its EIA Regulations and as per the following subsections.

# 6.1 Pre-identified and Registered Interested and Affected Parties (I&APs)

Relevant and applicable national, regional, and local authorities, and other interested members of the public were identified. Pre-identified I&APs were contacted directly, while other parties who contacted the Consultant after project advertisement notices in the newspapers, were registered as I&APs upon their request.

# 6.2 Communication with I&APs, and Means of Consultation Employed

Regulation 21 of the EIA Regulations details the steps to be taken during a public consultation process and these have been used in guiding this process. Communication with I&APs with regards to the proposed development was facilitated through the following means and in this order:

- A Background Information Document (BID) containing brief information about the proposed project was compiled and hand delivered to the Ministry of Environment, Forestry and Tourism (MEFT) accompanying the ECC application, and uploaded on the MEFT (ECC) Portal for project registration and shared with registered Interested and Affected parties (I&APs).
- A Stakeholders' (I&AP) List was developed and updated as new I&APs register for the ESA.
- Project Environmental Assessment notices were published in The Namibia Media Holdings' Market Watch newspapers (Allgemeine Zeitung, Die Republikein, and Namibian Sun) dated 31 January 2023 and 07 February 2023 – Appendix E.
- Due to the fact that the EPL is remotely located about 65km from Uis and other communities, consultation meetings were only scheduled and held with key local stakeholders (land custodians/users) in Uis. In other words, the meetings were with the Daure-Daman Traditional Authority and Tsiseb Conservancy management on the 17<sup>th</sup> of March 2023 and 18 March 2023 in Uis, respectively Figure 6-1. The consultation meeting minutes were taken and are attached hereto as Appendix F.

#### **Proposed Prospecting & Exploration Activities**



Figure 6-1: Consultation meeting with the members of; A- the Daure-Daman Traditional Authority in Uis on 17 March 2023, and B - Tsiseb Conservancy management in Uis on 18 March 2023

• Two A3 size posters were pasted at the Daure-Daman Traditional Authority and Uis frequented Supermarket (Brandberg Multisave Supermarket) – Figure 6-2.



Figure 6-2: A3 ESA Study Posters in Uis (A - Traditional Authority Office and B - Multisave Supermarket)

# 6.3 Feedback and Issues raised by the Stakeholders (I&APs)

Issues were raised by I&APs (from the consultation meetings) and these issues have been recorded and incorporated in the ESA Report and EMP. The summary these few key issues are presented in Table 6-1 below.

Aspect	Summary
Corporate Social Responsibility (CSR)	The Proponent to assist Uis communities with some needs such as schools and orphanages.
Promotion of transparency in communication and continued engagement	Promote and maintain transparency before and during exploration by continuously engaging the Traditional Authority and Conservancy.
Employment of Uis and surrounding communities	Employment of locals should be prioritized for jobs that can be done by them. These include general and casual jobs, where applicable.
Utilization of available local goods and services	Consider the use of local procurement of services and goods for the project activities to empower local businesses, where possible and applicable.
Ecological sensitivity of the EPL area	The EPL area is ecologically sensitive and needs to be protected while carrying out the activities. There is also a potential impact on the poaching of wildlife, either by poachers who take advantage of such as remote area or some project related workers engaging in wildlife crimes. Part of the EPL area falls under the Conservancy sections that is zoned for breeding of some animals (wildlife).

The consultation period ran from the 31<sup>st</sup> of January 2023 to the 28<sup>th</sup> of February 2023, but no comments were submitted to the Consultant. Given the remoteness of the EPL area, consultation meetings were held with the key stakeholders in Uis, whereby comments were made (as provided in the Table above).

The next chapter is the presentation of potential impacts identified, the assessment methodology, impact description and their assessment.

# 7 IMPACTS IDENTIFICATION, ASSESSMENT AND MEASURES

# 7.1 Identification of Potential Impacts

The proposed project and its associated activities are usually associated with different potential positive and negative impacts. For an environmental assessment, the focus is placed mainly on the negative impacts that are likely to affect the host environmental and social features. The assessment is done to ensure that these impacts are sufficiently addressed, and adequate mitigation measures are recommended thereto for implementation so that an impact's significance is brought under control, while maximizing the positive impacts. The potential positive and negative impacts that have been identified from the prospecting activities are listed as follow:

#### Positive impacts:

- Local socio-economic development through temporary employment creation.
- Payment of land use fees to the Conservancy and Traditional Authority to assist in uplifting the communities in and near Uis.
- Procurement of local goods and services for exploration by small and medium businesses to promote local entrepreneurship empowerment and local economic development.
- The presence of EPL crew, particularly the Exploration Manager and Environmental Control Officer (ECO) will aid in deterring crime against wildlife (anti-poaching). This will be done through raising continuous anti-poaching awareness to the workers and their responsibility to report suspicious movements in the area to the Exploration Manager and ECO while working/operating in the area.
- Rendering assistance to the anti-poaching team in the Conservancy with basic needs and other possible aids (donations) through the Conservancy (as per signed Memorandum of Understanding).

### Negative:

- Physical land / soil disturbance.
- Impact on local biodiversity (fauna and flora); potential illegal harvesting of protected vegetation and wildlife hunting (poaching) and habitat disturbance in the area.
- Potential impact on water resources and soils particularly due to pollution.
- Visual impact from unrehabilitated explored areas on the EPL may pose as an eyesore to travellers (including tourists) using the D2303 and D2342 roads.
- Accidental fire outbreaks related to the project activities.

### **Proposed Prospecting & Exploration Activities**

- Air quality issue: potential dust generated from the project activities such as drilling, possibly trenching and movement of heavy trucks on unpaved access roads.
- Potential occupational health and safety risks (trenches and drilled holes risk to wildlife).
- Vehicular traffic safety and impact on services infrastructure such as local roads.
- Vibrations and noise associated with drilling activities could impact wildlife.
- Environmental pollution (solid waste and wastewater).
- Archaeological and heritage resources impact (during trenching and drilling).

# 7.2 Impact Assessment Methodology

The Environmental Assessment process primarily ensures that potential impacts that may occur from project activity are identified and addressed with environmentally cautious approaches and legal compliance. The impact assessment method used for this project is in accordance with Namibia's Environmental Management Act (No. 7 of 2007) and its Regulations of 2012, as well as the International Finance Corporation (IFC) Performance Standards.

The identified impacts were assessed in terms of scale/extent (spatial scale), duration (temporal scale), magnitude (severity) and probability (likelihood of occurring), as presented in Table 7-1.

To enable a scientific approach to the determination of the environmental significance, a numerical value is linked to each rating scale. This methodology ensures uniformity and that potential impacts can be addressed in a standard manner so that a wide range of impacts are comparable. It is assumed that an assessment of the significance of a potential impact is a good indicator of the risk associated with such an impact. The following process will be applied to each potential impact:

- Provision of a brief explanation of the impact,
- Assessment of the pre-mitigation significance of the impact; and
- Description of recommended mitigation measures.

The recommended mitigation measures prescribed for each of the potential impacts contribute towards the attainment of environmentally sustainable operational conditions of the project for various features of the biophysical and social environment. The following criteria (in Table 7-1) were applied in this impact assessment:

The Criteria used to assess the potential negative impacts
Extent or (spatial scale) - extent is an indication of the physical and spatial scale of the impact.

The Criteria used to assess the potential negative impacts													
Low (1)	Low/Medium (2)	Medium (3)	Medium/High (4)	High (5)									
Impact is localised within the site boundary: Site only	. ,	Impacts felt within adjacent biophysical and social environments: Regional	Impact widespread far beyond site boundary: Regional	Impact extend National or over international boundaries									
Duration- Duration refer	Duration - Duration refers to the timeframe over which the impact is expected to occur, measured in relation to the lifetime of the project												
Low (1)	Low/Medium (2)	Medium (3)	Medium/High (4)	High (5)									
Immediate mitigating measures, immediate progress			Impact is long-term	Long term; beyond closure; permanent; irreplaceable or irretrievable commitment of resources									
Intensity, Magnitude	/ <b>severity</b> - Intensity refers element of the er	to the degree or magnitud nvironment. This a qualitati		rs the functioning of an									
H-(10)	M/H-(8)	M-(6)	M/L-(4)	L-(2)									
Very high deterioration,	Substantial	Moderate deterioration,	Low deterioration, slight										
loss of habitat, total alteration of ecological processes, extinction of rare species	deterioration, death, illness or injury, loss of habitat / diversity or resource, severe alteration, or disturbance of important processes	discomfort, partial loss of habitat / biodiversity or resource, moderate alteration	noticeable alteration in habitat and biodiversity. Little loss in species numbers	nuisance or irritation, minor change in species / habitat / diversity or resource, no or very little quality deterioration.									
injury of illness / total loss of habitat, total alteration of ecological processes, extinction of rare species <b>Probability of occurrent</b>	deterioration, death, illness or injury, loss of habitat / diversity or resource, severe alteration, or disturbance of important processes ce - Probability describes t experience with simila	discomfort, partial loss of habitat / biodiversity or resource, moderate alteration he likelihood of the impacts r projects and/or based on	noticeable alteration in habitat and biodiversity. Little loss in species numbers s occurring. This determina professional judgment	nuisance or irritation, minor change in species / habitat / diversity or resource, no or very little quality deterioration.									
injury of illness / total loss of habitat, total alteration of ecological processes, extinction of rare species	deterioration, death, illness or injury, loss of habitat / diversity or resource, severe alteration, or disturbance of important processes	discomfort, partial loss of habitat / biodiversity or resource, moderate alteration	noticeable alteration in habitat and biodiversity. Little loss in species numbers s occurring. This determina professional judgment Medium/High (4)	nuisance or irritation, minor change in species / habitat / diversity or resource, no or very little quality deterioration.									

# 7.3 Impact Significance

Impact significance is determined through a synthesis of the above impact characteristics. The significance of the impact "without mitigation" is the main determinant of the nature and degree of mitigation required. As stated in the introduction to this chapter, for this assessment, the significance of the impact without prescribed mitigation actions was measured.

Once the above factors (Table 7-1) have been ranked for each potential impact, the impact significance of each is assessed using the following formula:

### SP = (magnitude + duration + scale) x probability

The maximum value per potential impact is 100 significance points (SP). Potential impacts were rated as high, moderate, or low significance, based on the following significance rating scale (Table 7-2).

Significance	Environmental Significance Points	Colour Code
High (positive)	>60	Н
Medium (positive)	30 to 60	М
Low (positive)	<30	L
Neutral	0	Ν
Low (negative)	>-30	L
Medium (negative)	-30 to -60	М
High (negative)	>-60	Н

#### Table 7-2: Impact significance rating scale

For an impact with a significance rating of high, mitigation measures are recommended to reduce the impact to a low or medium significance rating, provided that the impact with a medium significance rating can be sufficiently controlled with the recommended mitigation measures. To maintain a low or medium significance rating, monitoring is recommended for a period to enable the confirmation of the significance of the impact as low or medium and under control.

The assessment of the project phases is done for both pre-mitigation (before implementing any mitigation) and post-mitigation (after mitigations are implemented). The objective with the mitigation measures is to firstly avoid the risk and if the risk cannot be avoided, mitigation measures to minimize the impact are recommended. Once the mitigation measures have been applied, the identified risk will be of low significance.

# 7.4 Description and Assessment of Potential Impacts

The potential impacts from the proposed project activities are described, and assessed in Table 7-3. The management and mitigation measures are in a form of management action plans are provided in the Draft EMP.

#### Table 7-3: The Description and Assessment of the impacts of exploration activities on the biophysical and social environment

Impact	Impact Description	Impact Assessment										
-			F	Pre-mitigatio	n Rating			Р	ost-mitigatio	on Rating		
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance	
					sitive Impacts			· · · -		T =		
Employment	Although temporary, the project	L / M- 2	L/M-2	L/M-4	L - 1	L - 8	M / H - 4	H - 5	M - 6	H - 5	H - 75	
creation	activities will create employment						7					
	to some locals from sampling											
	throughout to drilling. This will											
	include casual labourers,											
	technical assistants, cooks, etc.											
Land use	Payment of land use fees to the	L / M- 2	L/M-2	L / M - 4	L - 1	L - 8	M/H-	H - 5	M - 6	H - 5	H - 75	
fees for	Conservancy and Traditional						4					
socio-	Authority will assist in uplifting											
economic	the communities in, near Uis and											
development	these between the EPL and Uis.											
Empowerme	Procurement of local goods and	L / M- 2	L/M-2	L/M-4	L/M-2	L - 16	M - 3	M / H - 4	L/M-4	M / H - 4	M - 44	
nt of local	services for exploration by small											
businesses	and medium businesses will											
	promote local entrepreneurship											
	empowerment and local											
	economic development (income											
	generation).											
Combating /	The presence of EPL crew,	L / M- 2	L/M-2	L/M-4	L - 1	L-8	M - 3	M / H - 4	L / M - 4	M / H - 4	M - 44	
fighting anti-	particularly the Exploration											
poaching	Manager and Environmental											
	Control Officer will aid in											

Impact	Impact Description	Impact Assessment									
				Pre-mitigatio					ost-mitigatio		
	deterring crime against wildlife	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	by keeping an eye on the area										
	and notifying the Conservancy										
	and Police of any suspicious										
	movements in the area. The										
	Proponent will also assist the										
	Conservancy and possibly the										
	wildlife rangers with basic										
	supplies while operating in the										
	area. These will be included in										
	the Memorandum of										
	Understanding between the										
	Proponent and Conservancy.										
	I			Negative	e (Adverse) Im	pacts					
Physical	The excavations and land	M - 3	M/H-4	L/M-4	M / H - 4	M – 44	L/M-	L/M-2	L/M-4	L/M-2	L - 16
disturbance	clearing to enable siting of						2				
to the site	project structures and equipment										
soils	will potentially result in soil										
	disturbance through target site										
	establishment, access road										
	creations and unnecessary										
	offload driving. These would										
	leave the site soils exposed to										
	erosion (areas with no to little										
	vegetation cover to the soils in										
	place). This is a concern										
	because desert soils are										
	sensitive to disturbance, and the										
	prints may take hundred years to										
	fade. The movement of heavy										

Impact	Impact Description	Impact Assessment									
				Pre-mitigatio		1			ost-mitigatio		
	vehicles and equipment may	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	lead to compaction of the soils										
	during exploration. This will,										
	however, be a short-term and										
	localized impact.										
	localized impact.										
Impact on the	Fauna: The EPL falls within an	M: -3	M: -3	M: -6	M / H: 4	M: -48	L/M:-	L/M:-2	L / M: -4	L / M: 2	L: -16
sensitive	ecologically sensitive area.						2				
Biodiversity:	Therefore, if activities such as										
Wild Fauna	trenching and drilling activities										
and Flora	are not carefully conducted, this										
	would result in land degradation.										
	The degradation would lead to										
	habitat loss for a diversity of flora										
	and fauna onsite. However,										
	exploration activities will be										
	limited specific target areas only										
	within the EPL.										
	The presence and movement of										
	the exploration workforce and										
	operation of project equipment										
	and heavy vehicles would disturb										
	wildlife at the explored sites of										
	the EPL. There is also a potential										
	illegal hunting (poaching) of local										
	wildlife by project related										
	workers. This could lead to loss										
	or number reduction of specific										
	faunal species which also										

Impact	Impact Description	Impact Assessment										
-				Pre-mitigatio	n Rating	1			ost-mitigatio	ion Rating		
	ing a star ta unig an in the	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance	
	impacts tourism in the											
	community.											
	Flora: The already scarce flora											
	(vegetation) in the area would be											
	impacted through land clearing											
	to create exploration access											
	roads, setting up project											
	equipment and infrastructures,											
	and detailed exploration											
	activities. The clearing of											
	vegetation, where deem											
	necessary will be limited to the											
	specific route and minimal,											
	therefore, the impact will be											
	localized, site-specific, therefore											
	manageable.											
Air Quality:	There is a potential impact of	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L/M-	L / M - 2	L - 2	L / M - 2	L - 12	
Dust	dust emanating from site access						2					
Generation	roads when transporting											
	exploration equipment and											
	supply to and from site. This may											
	compromise the air quality in the											
	area. Additionally, activities											
	carried out as part of the											
	exploration works such as drilling											
	would contribute to the dust											
	levels in the air.											
Visual	Exploration activities, particularly	M - 3	M - 3	M - 6	M / H - 4	M – 48	L / M: - 2	L / M: -2	L / M: -4	L / M: 2	L: -16	
impact:	for Dimension Stone usually						2					

Impact	Impact Description	Impact Assessment									
				Pre-mitigatio		1			ost-mitigatio		
Coordio view	leave even in the lead	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
Scenic view	leave scars on the local										
of the area	landscape. This is bound to										
for Tourism	happen when exploration sites										
	are located close to or along										
	roads, and these scars in many										
	cases contrasts the surrounding										
	landscape and thus may										
	potentially become a visual										
	nuisance, especially in tourist-										
	prone areas such as the EPL										
	area. The sight of the explored										
	and unrehabilitated areas of the										
	EPL may be an eyesore to										
	tourists and travelers alike on										
	D2303 and D2342.										
	The tourists and										
	motorists/travelers on the D2303										
	and D2342 would be impacted, if										
	Dimension Stone activities are										
	undertaken on the EPL side										
	overseeing the D2303 and										
	D2342. The eyesore associated										
	with Dimension Stone is mainly										
	associated with white marble										
	exploration and or mining, given										
	its distinctive color from the host										
	environment compared to dark										
	or black granites and dolerites on										
	EPL-8788. The presence of										
	exploration vehicles and										
	und und										

Impact	Impact Description					Impact As	sessmen	t			
				Pre-mitigatio				P	ost-mitigatio		
	machinery may impact the	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	scenic view of the area for										
	tourism and travelers on the										
	roads.										
	This impact is considered										
	minimal as only small blocks of										
	the stone will be extracted for										
	analysis as part of exploration										
	and duration will be short.										
Water	The abstraction of more water	M - 3	M - 3	M - 6	M / H - 4	M – 48	L/M- 2	L/M-2	L - 2	L / M - 2	L - 12
Resources	than it can be replenished from						-				
Demand and	low groundwater potential areas										
Use	would negatively affect wildlife										
	watering in the area that depend										
	on the same low potential										
	groundwater resource (aquifer).										
	The impact of the project										
	activities on the resources would										
	be dependent on the water										
	volumes required by each										
	project activity. Commonly										
	exploration activities use a lot of										
	water, mainly diamond drilling										
	(for Base & Rare, Industrial										
	Minerals, Nuclear Fuels and										
	Precious Metals) that is more										
	water-consuming compared to										
	other techniques like reverse										
	circulation. The amount of water										

Impact	Impact Description	Impact Assessment											
-		Pre-mitigation Rating						Post-mitigation Rating					
	required for diamond drilling	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance		
	would be 10,000 to 25,000 litres												
	(10 to 25 $m^3$ ) per day per hole.												
	Given the fact that the EPL area												
	is underlain by rock units with												
	low groundwater potential, the												
	Proponent will be carting water												
	for drilling from outside the area												
	and store it in industry standard												
	water reservoirs/tanks on site												
	and refilled as required. The												
	required water would also be												
	dependent on the duration of the												
	exploration works and number of exploration holes required to												
	make reliable interpretation on												
	explored for during exploration.												
	Therefore, the impact will only last for the duration of the												
	exploration activities and ceases												
	upon their completion.												
Soil and	The proposed exploration	M: -3	M: -3	M: -6	M / H: 4	M: -48	L / M: -	L / M: -2	L / M: -4	L / M: 2	L: -16		
Water	activities are associated with a						2						
Resources	variety of potential pollution												
Pollution	sources (i.e., lubricants, fuel, and												
	wastewater) that may												
	contaminate/pollute soils and												
	eventually groundwater and												
	surface water. The anticipated												

Impact	Impact Description	Impact Assessment										
		Pre-mitigation Rating						Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance	
	potential source of pollution to											
	water resources from the project											
	activities would be hydrocarbons											
	(oil) from project vehicles,											
	machinery, and equipment as											
	well as potential											
	wastewater/effluent from											
	exploration related activities.											
	The spills (depending on											
	volumes spilled on the soils)											
	from these machinery, vehicles											
	and equipment could be washed											
	in surface water bodies such as											
	rivers and streams. The pollution											
	may eventually infiltrate into the											
	ground and pollute the fractured											
	or faulted aquifers. This impact											
	would occur during heavy rainy											
	season when surface runoff											
	would be inevitable. However, it											
	should be noted that the scale											
	and extent/footprint of the											
	activities where potential											
	sources of pollution will be											
	handled is relatively small.											
	Therefore, the impact will be											
	moderately low.											
Waste	Waste types such as solid,	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L - 1	L - 1	L - 2	L / M - 2	L - 8	
Generation	wastewater and possibly											
	hazardous will be produced											

Impact	Impact Description	Impact Assessment									
-		Pre-mitigation Rating Post-mitigation Rating							on Rating		
	and the desire combined in the life the	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
(Environmen	onsite during exploration. If the										
tal pollution)	generated waste is not disposed										
	of in a responsible way, land										
	pollution may occur on the EPL										
	or around the site. If solid waste										
	such as papers and plastics are										
	not properly stored or just thrown										
	into the environment (littering),										
	these may be consumed by wild										
	animals which could be										
	detrimental to their health.										
	Improper handling, storage and										
	disposal of hydrocarbon										
	products and hazardous										
	materials at the site may lead to										
	soil and groundwater										
	contamination, in case of spills										
	and leakages. Therefore, the										
	exploration programme needs to										
	have appropriate waste										
	management for the site. To										
	prevent these issues,										
	biodegradable and non-										
	biodegradable wastes will be										
	stored in separate containers										
	and collected regularly for										
	disposal at a nearest recognized										
	waste management facilities										

Impact	Impact Description	Impact Assessment										
•				Pre-mitigatio			Post-mitigation Rating					
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance	
Occupational	Project personnel (workers)	M - 3	M - 3	M - 6	M / H - 4	M – 48	L/M- 2	L/M-2	L - 2	L / M - 2	L - 12	
Health and	involved in the exploration						2					
Safety Risks	activities may be exposed to											
	health and safety risks. The											
	heavy vehicle, equipment and											
	fuel storage area will be properly											
	secured to prevent any harm or											
	injury to the Proponent's											
	personnel, locals and animals.											
	Another potential risks to both											
	people and wildlife within the											
	EPL are unfenced exploration											
	trenches or trenches that are not											
	backfilled after completing the											
	sampling. Unsecured											
	exploration trenches and even											
	uncapped holes could pose a											
	risk of people or wildlife falling											
	into the open trenches leading to											
	injuries.											
	-											
	The use of heavy equipment,											
	especially during drilling and the											
	presence of hydrocarbons on											
	sites may result in accidental fire											
	outbreaks. This could pose a											
	safety risk to the project											
	personnel and locals too											
Vehicular	The local roads such as C35,	M - 3	M / H - 4	L/M-4	M / H - 4	M - 44	L/M-	L/M-2	L - 2	L/M-2	L - 12	
Traffic Safety	C36, D2303 and D2342 is the						2					

Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
	main transportation routes for all	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	vehicular movement in the EPL										
	area. There would be a potential										
	increase in traffic flow especially										
	during exploration stage of the										
	project activities, due to the										
	delivery of supplies, goods and										
	services to site. Depending on										
	the project needs, trucks,										
	medium and small vehicles will										
	be frequenting the area to and										
	from exploration sites on the										
	EPL. This would potentially										
	increase slow moving heavy										
	vehicular traffic along these										
	roads.										
	Exploration works will be										
	undertaken in stages, on certain										
	days of the week, few vehicles										
	and the work will be temporary.										
	Therefore, the risk is anticipated										
	to be short-term, not frequent										
											1 10
Impact on	The project activities will mean	M: -3	M: -3	M / L: -4	M / H: 4	M: -40	L-1	L - 1	M / L - 4	M/L-2	L - 12
local road	an increased movement of										
use	heavy trucks and equipment on										
	the local gravel roads which										
	would exert more pressure on										
	these roads, and worsening their										
	conditions. This will be a concern										

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Impact	Impact Description	Impact Assessment									
		Pre-mitigation Rating					Post-mitigation Rating				
	if we interview and see it was	Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	if maintenance and care is not										
	done during the exploration										
	phase. The impact would be										
	short-term and therefore,										
	manageable.										
Noise and	There is a potential of noise from	M - 3	M - 3	M - 6	M / H - 4	M – 48	L-1	L/M-2	L - 2	L / M -2	L - 10
vibration	certain activities, especially										
from drilling	drilling and trenching, which may										
	be a nuisance to wildlife.										
	Excessive noise and vibrations										
	without any protective measures										
	in place can be also a health risk										
	to workers on site. The										
	exploration equipment used for										
	drilling on site is of medium size										
	and the noise level is bound to										
	be limited to the site only,										
	therefore, the impact likelihood is										
	minimal.										
Archaeologic	As fully described in the AHIA	M - 3	M - 3	M - 6	M / H - 4	M – 48	L/M-	L/M-2	L - 2	L / M - 2	L - 12
al and	Report (Mushi, 2023), the						2				
Heritage	proposed project activities are										
resources	likely to involve the removal of										
	topsoil during site preparation,										
	course of the prospecting and										
	excavation phase or preparation										
	of access roads (if need be). The										
	most impact is likely to be										
	caused by earthworks in the form										

Impact	Impact Description	Impact Assessment									
-		Pre-mitigation Rating					Post-mitigation Rating				
		Extent	Duration	Intensity	Probability	Significance	Extent	Duration	Intensity	Probability	Significance
	of clearing, drilling, excavating,										
	removing, or micro-sitting of the										
	project equipment. The area of										
	interest is known to have										
	sensitive archaeological and										
	heritage sites such as stone										
	artifacts, rock shelters and caves										
	graves/cultural site). Therefore										
	chance finds procedure,										
	archaeological mitigation										
	measures and heritage										
	monitoring approaches are										
	highly recommended to be										
	adopted and implemented										
	throughout the exploration										
	activities to avoid any destruction										
	and disturbances of the known										
	and unknown archaeological										
	materials.										

### 7.5 Cumulative Impacts Associated with the Proposed Exploration

According to the International Finance Corporation (2013), cumulative impacts are defined as "those that result from the successive, incremental, and/or combined effects of an action, project, or activity (collectively referred to in this document as "developments") when added to other existing, planned, and/or reasonably anticipated future ones". Similarly, to many other exploration projects, some of the cumulative impact to which the proposed project and associated activities potentially contribute are the:

- <u>Poaching (illegal hunting of wildlife)</u>: During the ESA consultation process, it was indicated that
  poaching has been ongoing in the area, and some of which could be linked to people from outside
  the area. Therefore, this impact is likely to continue with the introduced additional people (related
  to projects) in the area. Regardless, mitigations measures will need to be implemented to mitigate
  these impacts.
- <u>Impact on road infrastructure:</u> The proposed exploration activities will contribute cumulatively to
  various existing activities such as travelling associated with tourism, and existing mineral licenses
  and other projects in the area. The contribution of the proposed project to this cumulative impact
  is however not considered significant given the short duration, and local extent (site-specific) of
  the intended mineral exploration activities.
- <u>Impact on Archaeological and Heritage resources:</u> according to Mushi (2023), some archaeological materials such as stone artefacts and sites are likely to be lost during the clearance of land or construction of other facilities necessary for exploration works. Similarly, the focus of mitigation measures in the AHIA Report is to recommend the layout of the project to avoid all known significant heritage or cultural sites and burial places and will thus make a negligible contribution to cumulative impacts. The cumulative impacts are deemed to be of low significance in this case. However, with the implementation of project-specific mitigation measures as listed in the Draft EMP, this would reduce the impact significance from lot to very low after mitigation, and eventually negligible

## 8 CONCLUSIONS

The ESA Study for the proposed exploration activities on EPL-8788 was undertaken in accordance with the EMA and its 2012 EIA Regulations. Some key potential positive and negative impacts were identified. The key negative impacts were described, assessed and appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers.

The public was notified as required by Section 21 to 24 of the EIA Regulations by placing adverts in three newspapers (*Allgemeine Zeitung, Die Republikein, and Namibian Sun*) dated 31 January 2023 and 07 February 2023. Two consultation meetings with directly affected and key stakeholders were held in Uis on the 17<sup>th</sup> and 18<sup>th</sup> of March 2023. The stakeholders made some comments to the proposed project activities.

The comments were addressed and incorporated into this Report and Draft EMP.

**Impact Assessment:** The key negative impacts were described, assessed. The potential negative impacts indicated a medium rating significance. To minimize the significance, appropriate management and mitigation measures made thereof for implementation by the Proponent, their contractors, and workers to avoid and/or minimize their significance on the environmental and social components. The effective implementation of the recommended management and mitigation measures accompanied by monitoring will particularly see the reduction in the significance of adverse impacts that cannot be avoided completely (from medium rating to low).

The Scoping assessment (ESA) Study was deemed sufficient and concluded that no further detailed assessments are required to the ECC application for the prospecting and exploration activities.

Serja Consultants are confident that the potential negative impacts associated with the proposed project activities can be managed and mitigated by the effective implementation of the recommended management and mitigation measures and with more effort and commitment put on monitoring the implementation of these measures. It is therefore, recommended that the proposed prospecting and exploration activities be granted an Environmental Clearance Certificate, and provided that:

- All the management and mitigation measures provided herein are effectively and progressively implemented.
- All required permits, licenses and approvals for the proposed activities should be obtained as required. These include permits and licenses for land use agreements, services provision agreements (water provision) to explore and ensuring compliance with these specific legal requirements.
- The Proponent, their project workers or contractors comply with the legal requirements governing their project and its associated activities and ensure that project permits and or approvals required

to undertake specific site activities are obtained and renewed as stipulated by the issuing authorities.

• Site areas where exploration activities have ceased are rehabilitated, as far as practicable, to their pre-exploration state. This includes the levelling of stockpiled topsoil, backfilling of exploration trenches and closing/capping of exploration holes.

To maintain the desirable rating and that the potential impacts are under control, the implementation of management and mitigation measures should be monitored by their Environmental Control Officer (ECO) and audited by an Independent Environmental Consultant on a bi-annual basis. The monitoring of this implementation will not only be done to maintain the reduce impacts' rating or maintain low rating but to also ensure that all potential impacts that might arise during implementation are properly identified in time and addressed immediately.

## 9 LIST OF REFERENCES

- 1. Erongo Regional Council. (2015). Economy Available from http://www.erc.com.na/economy/fishinig/.
- Excel Dynamic Solutions. (2021). Environmental Scoping Assessment (ESA) Report: The Proposed Exploration of Base & Rare Metals, and Precious Metals on EPL-7246 near Kalkfeld in the Omatjete District of the Erongo Region, Namibia. Windhoek. Ministry of Environment, Forestry and Tourism.
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- 8. Resilient Environmental Solutions. (2022). Environmental Monitoring Report for EPL-7415 in the Omaheke Region: Bi-Annual Monitoring of March 2022-Novemeber 2022. Windhoek. Unpublished.

Appendix A, C, D, E and F- <u>uploaded separately on the Portal as</u> <u>required</u>

APPENDIX B: THE COPY OF ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) APPLICATION SUBMITTED TO THE MINISTRY OF MINES AND ENERGY (COMPETENT AUTHORITY) AND UPLOADED ON THE ECC PORTAL

Revenue Stamps NAMIBIA REVENUE N\$100	MINMBELE OF LINE AND COLOR NS200 2 7-JAN 2023
ANNEXURE 1	Tot: 061 224 2 201
FORMS	RECEIVED 2 Signature:

#### Form 1

#### REPUBLIC OF NAMIBIA

### ENVIRONMENTAL MANAGEMENT ACT (No. 7 of 2007)

#### (Section 32)

# APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE

#### PART A: DETAILS OF APPLICATION

1.	Name:	Tarah Hainana						
2.	Business Registration No.:	77071500088						
З.	Correspondence Address:	P. O. Box 3039 Windhoek, Namibia						
4.	Name of Contact Person:	Mr. Tarah Hainana						
5.	Position of Contact Person:	Managing Member (EPL Holder)						
6.	Telephone No.:	+264 81 226 9426						
7.	Fax No:	N/A						
8.	E-mail Address:	tarahhainana@gmail.com / info@serjaconsultants.com						

### PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE 1. THE ENVIRONMENTAL CLEARANCE CERTIFICATE IS FOR:

The 'listed activities' that are relevant or related to the proposed activities are listed below:

#### MINING AND QUARRYING ACTIVITIES

-Listed Activity 3.1 The construction of facilities for any process or activities which requires a license, right of other forms of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act, 1992).

-Listed Activity 3.2 other forms of mining or extraction of any natural resources whether regulated by law or not.

-Listed Activity 3.3 Resource extraction, manipulation, conservation, and related activities.

#### DETAILS OF THE ACTIVITY(S) COVERED BY THE ENVIRONMENTAL CLEARANCE 2. CERTIFICATE:

#### Title of Activity 2.1

Environmental Clearance Certificate (ECC) for the Prospecting and Exploration Activities on Exclusive Prospecting License (EPL) No. 8788 situated west of Uis Settlement in the Erongo Region, Namibia

#### Location of Activity 2.2

The EPL is located about 65km west of Uis and immediate west of the Brandberg Mountain in the Erongo Region, and covers of 19,902.62 hectares (ha).

The locality map is presented in the Background Information Document (BID) accompanying this application.

### MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM Nature of Activity 2.3 Prospecting and Exploration Activities of commodities on Exclusive Prospecting License (EPL) No. 27 JAN 2023 8788 Scale and Scope of the Activity

#### 2.4

The scale of the project is considered small to medium and short-term. The project activities will be limited within the EPL boundaries. The planned project activities are provided in the attached BID.

Prior to undertaking the proposed activities on the EPL, the Proponent will be required to sign land access and use agreements with the affected landowners or land custodian according to Section 51 (1a) of the Minerals (Prospecting and Mining) Act No. 33 of 1992. The anticipated duration of the proposed prospecting and exploration activities is between anticipated to last between 2 to 4 months for Dimension Stone and between 12 months to 36 months for Base & Rare, Industrial Minerals, Nuclear Fuels, and Precious Metals. However, should the anticipated timeframe turn out to be insufficient or depending on the exploration findings by the end of the planned timeline, this may be stretched longer to some more months or year and communicated with the relevant stakeholders.

The Proponent intends to adopt a systematic prospecting approach of the following (detailed in the BID):

# Base & Rare Metals, Nuclear Fuels, Precious Metals and Industrial Minerals

The Proponent intends to adopt a systematic prospecting and exploration approach of the following:

- Desktop Study: Geological mapping (Non-invasive Technique such as geophysics) 0
- Lithology geochemical surveys: Rock and Soil sampling consists of small pits. 0

 Detailed Exploration Drilling and Trenching (Invasive Technique): Should analyses by an analytical laboratory be positive, holes are drilled, and drill samples collected for further analysis.

### Dimension Stone: Desktop and Detailed Exploration (Test Quarrying)

The exploration of dimension stone on the EPL will be done as per the following approach:

- Desktop Study: The exploration program will commence with a review of geological maps and historical drilling and / or exploration data for the area, if any.
- Field Evaluation: The field evaluation is to be carried out by simple collection of demonstration sample blocks on target areas of the EPL.
- Feasibility Study / Detailed Exploration and Test Quarrying.

The project requirements in terms of human resources, technology, equipment, vehicles, and machinery are described in the attached BID.

The granting of the ECC and effective implementation of the Environmental Management Plan (EMP) will ensure that the exploration activities comply with the Environmental Management Act, 2007, and the 2012 Environmental Impact Assessment (EIA) Regulations, while ensuring responsible as well as sustainable mineral exploration in Namibia at large.

#### PART C: DECLARATION BY APPLICANT

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended, or cancelled if any information given above is false, misleading, wrong, or incomplete.

FAt the Juni

FREDRIKA SHAGAMA

Signature of Applicant Full Name in Block letters

Environmental Assessment Practitioner

Position

Serja Hydrogeo-Environmental Consultants

on behalf of <u>Tarah Hainana</u>

27 January 2023 MANSTRY OF ENVIRONMENT, FORESTRY AND TOURISM DRECTORATE OF ENVIRONMENTAL AFFAIRS 27 JAN 2023 Tel: 061 284 2791 RECEIVED 2 Signature: