

**ENVIRONMENTAL SCOPING ASSESSMENT (ESA)
FOR
THE PROPOSED PROSPECTING AND EXPLORATION
ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL)
NO. 10011 LOCATED WEST OF BRANDBERG MOUNTAIN, IN
DAURES CONSTITUENCY IN THE ERONGO REGION,
NAMIBIA**

**ENVIRONMENTAL ASSESSMENT REPORT: DRAFT FOR CLIENT
REVIEW**

ECC APPLICATION NUMBER: 005390

<p>Author: Ms. Milika Dineinge</p> <p>Reviewer: Ms. Aili lipinge</p> <p>Company: Excel Dynamic Solutions (Pty) Ltd</p> <p>Telephone: +264 (0) 61 259 530</p> <p>Fax2email: +264 (0) 886 560 836</p> <p>Email Address: public@edsnamibia.com</p>	<p>Prepared for: Pointe Noire Investments CC</p>
---	---

EXECUTIVE SUMMARY

Excel Dynamic Solutions (Pty) Ltd (The Consultant) was appointed by **Pointe Noire Investments CC** (The Proponent) to act on their behalf in obtaining the Environmental Clearance Certificate (ECC) for prospecting and exploration activities on Exclusive Prospecting License (EPL) No.10011. The 7644.5566 ha EPL is located west of Brandberg mountain, about 68 km north - west from Uis, in the Erongo region (Daures constituency). EPL No. 10011 (center coordinates; -21.049239, 14.328247) lies in a communal land, within the Tsiseb conservancy. The Proponent intends to prospect and explore for the following commodities: Base& Rare Metals, Industrial Minerals, Precious Metals and Precious stones.

Prospecting and exploration-related activities are among the listed activities that may not be undertaken without an ECC, under the Environmental Impact Assessment (EIA) Regulations. Therefore, to ensure that the proposed activity is compliant with the national environmental legislation, the project Proponent appointed an independent environmental consultant, Excel Dynamic Solutions (Pty) Ltd, to undertake the required Environmental Assessment (EA) process and apply for the ECC on their behalf.

PROJECT DESCRIPTION

Planned Activities: Proposed Exploration Methods

The Proponent intends to adopt a systematic prospecting and exploration approach to the project as follows:

1. **Non-invasive Techniques:** Mainly include desktop study, geological mapping, lithology geochemical surveys, and geophysical surveys.
2. **Invasive Techniques:** Include drilling and associated activities.

PUBLIC CONSULTATION

The public consultation process assists the Environmental Consultant in identifying all potential impacts and aids in the process of identifying possible mitigation measures and alternatives to certain project activities. The communication with Interested & Affected parties (I&APs) about the proposed prospecting and exploration activities was done through the following means to ensure that the public is notified and allowed to comment on the proposed project:

- A Background Information Document (BID) containing brief information about the proposed exploration works was compiled and emailed to pre-identified Interested and Affected Parties (I&APs), and upon request to all newly registered I&APs;
- Project Environmental Assessment notices were published in The Namibian and New Era Newspapers on the 10th and the 17th January 2025, briefly explaining the activity and its locality, inviting members of the public to register as I&APs and to submit their comments/concerns/issues.
- Public notices were placed on the notice board at the Brandberg rest camp and at the Tsiseb conservancy office in Uis to inform the members of the public about the EIA process and register as I&APs as well as to submit comments/concerns/issues.
- Two public consultation meetings were held on the 14th of March 2025 at 10h17 and at 12h06 at the Brandberg rest camp and the Tsiseb conservancy office respectively. During these meetings, the stakeholders raised their concerns, issues and comments regarding the proposed project.

Potential Impacts identified.

The following potential impacts are anticipated:

- **Positive impacts:** Employment creation and skills transfer, Investment opportunities/infrastructure-related development benefits, Increase in local, regional and economic development, Improved support for local businesses through the procurement of locally available goods and services.
- **Negative impacts:** Disturbance of grazing land, Impact on fauna and flora through habitat disturbance and possible poaching, Minor noise and vibration pollution associated with drilling, Minor air pollution through dust generation, Generation of waste pollution, Water resource use (over – abstraction of water), Soil and underground pollution, Possible occupational community health and safety risks/hazard, Possible impact on archaeological or cultural heritage, as well as Impacts associated with closure and decommissioning of exploration works.

RECOMMENDATIONS

The Environmental Consultant is assured that the possible negative impacts of the proposed project can be effectively controlled and reduced through the successful implementation of the

suggested management and mitigation measures, along with a committed effort to monitor their execution.

It is, hence, recommended that the proposed prospecting and exploration activities be granted an ECC, 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. These include permits and licenses for land use access agreements to explore and ensure compliance with these specific legal requirements.
- The Proponent and all 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.
- Sites, where exploration activities have ceased, are rehabilitated, as far as practicable, to their pre-exploration state.
- Environmental Compliance monitoring reports should be compiled and submitted to the Department of Environmental Affairs and forestry's (DEAF) portal as per the provision made on the Ministry of Environment, Forestry and Tourism (MEFT), DEAF's portal.

Disclaimer

Excel Dynamic Solutions (EDS) warrants that the findings and conclusion contained herein were accomplished by the methodologies outlined in the Scope of Work and Environmental Management Act (EMA) No. 7 of 2007. These methodologies are described as representing good customary practice for conducting an EIA of a property to identify recognized environmental conditions. There is a possibility that even with the proper application of these methodologies there may exist the subject property conditions that could not be identified within the scope of the assessment, or which were not reasonably identifiable from the available information. The Consultant believes that the information obtained from the record review and during the public consultation processes, concerning the proposed exploration work is reliable. However, the Consultant cannot and does not warrant or guarantee that the information provided by the other sources is accurate or complete. The conclusions and findings outlined in this report are strictly

limited in time and scope to the date of the evaluations. No other warranties are implied or expressed.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those people contacted.

DRAFT

TABLE OF CONTENTS

EXECUTIVE SUMMARY	i
LIST OF FIGURES	vii
LIST OF TABLES	vii
LIST OF APPENDICES	viii
LIST OF ABBREVIATIONS	viii
1 INTRODUCTION.....	13
1.1 Project Background.....	13
1.2 Terms of Reference, Scope of Works and Appointed EA Practitioner	16
1.3 Motivation for the Proposed Project	16
2 PROJECT DESCRIPTION: PROPOSED EXPLORATION ACTIVITY	17
2.1 Prospecting Phase (Non- Invasive Techniques).....	17
2.2 Exploration Phase (Invasive Techniques).....	18
2.3 Site accessibility	19
2.4 Decommissioning and Rehabilitation Phase.....	21
3 PROJECT ALTERNATIVES.....	21
3.1 Types of Alternatives Considered	21
3.1.1 The "No-go" Alternative.....	21
3.1.2 Exploration Location	22
3.1.3 Exploration Methods.....	23
4 LEGAL FRAMEWORK: LEGISLATION, POLICIES, AND GUIDELINES	29
4.1 The Environmental Management Act (No. 7 of 2007)	29
4.2 International Policies, Principles, Standards, Treaties and Conventions	37
5 ENVIRONMENTAL BASELINE.....	41
5.1 Climate.....	41
5.2 Topography	44
5.3 Soils	46
5.3 Geology.....	47

5.4	Hydrology and water resources	48
5.5	Fauna and Flora	49
5.6	Heritage and Archaeology	50
5.7	Socio – Economic condition of Uis	51
6	PUBLIC CONSULTATION PROCESS	52
6.1	Pre-identified and Registered Interested and Affected Parties (I&APs)	52
6.2	Communication with I & APs	53
6.3	Public Feedback	54
7	IMPACT IDENTIFICATION, ASSESSMENT AND MITIGATION MEASURES	55
7.1	Impact Identification.....	55
7.2	Impact Assessment Methodology	56
7.2.1	Extent (spatial scale).....	57
7.2.2	Duration.....	57
7.2.3	Intensity, Magnitude / severity	57
7.2.4	Probability of occurrence	58
7.2.5	Significance.....	59
7.3	Assessment of Potential Negative Impacts	61
7.3.1	Disturbance to the grazing land.....	61
7.3.2	Impact on Fauna and Flora through habitat disturbance and possible poaching	61
7.3.3	Generation of Dust (Air Quality)	62
7.3.4	Water Resources Use (over – abstraction of water)	63
7.3.5	Soil and underground water Pollution.....	63
7.3.6	Waste Generation.....	64
7.3.7	Occupational Health and Safety Risks	65
7.3.8	Noise and vibrations pollution associated with drilling	65
7.3.9	Disturbance to Archaeological and Heritage resources.....	66
7.3.10	Impacts associated with closure and decommissioning of exploration works.....	66

8	RECOMMENDATIONS AND CONCLUSION.....	67
8.1	Recommendations	67
8.2	Conclusion.....	68
9	REFERENCES	69

LIST OF FIGURES

Figure 1: EPL No. 10011 locality Map.....	14
Figure 2: Land use map around EPL No. 10011.....	15
Figure 3: Location of EPL 10011 (National Mining Cadastre)	23
Figure 4: Maximum and minimum temperature of the Uis settlement and the surrounding area (Source: World Weather Online, 2025)	42
Figure 5: Rainfall data about the area surrounding EPL No. 10011	42
Figure 6: Wind Speed at the Uis settlement and the surrounding environment	43
Figure 7: Wind rose for the Uis settlement and the surrounding areas	44
Figure 8: The topography of the area surrounding the EPL No. 10011	45
Figure 9: The general overview of the EPL 10011	45
Figure 10: Soil type at the area surrounding EPL No. 10011	46
Figure 11: A picture depicting the soil found on site in EPL No. 10011	47
Figure 12: Geological map of the area surrounding EPL No. 10011	47
Figure 13: The Hydrological map of the area surrounding the EPL No. 10011.....	48
Figure 14: The type of vegetation cover surrounding the EPL No. 10011.....	49
Figure 15: Vegetation seen on site.....	50
Figure 16: Some Socio - economic Statistics of the Daures Constituency (source: city population, 2025)	51
Figure 17: The notice placed at the notice board of Brandberg rest camp (a) and at Tsiseb conservancy office (b).....	54
Figure 18: The consultation meetings at the Brandberg rest camp (a) and at the Tsiseb conservancy (b).	54

LIST OF TABLES

Table 1: Alternatives (Exploration Methods).....	24
Table 2: Applicable Legal Standards, Policies and Guidelines.....	30
Table 3: International Policies, and Principles.....	38
Table 4: Summary of Interested and Affected Parties (I&Ps)	52
Table 5: Summary of main issues raised, and comments received during public meeting engagements	55
Table 6: Extent / Spatial Impact rating	57
Table 7: Duration Impact rating.....	57
Table 8: Intensity, magnitude or severity impact rating.....	57

Table 9: Probability of occurrence rating	58
Table 10: Significance rating scale	59
Table 11: Assessment of impacts of exploration on grazing land	61
Table 12: Assessment of impacts of exploration on biodiversity	62
Table 13: Assessment of Impacts of exploration on air quality	62
Table 14: Assessment of impacts of exploration on water resources	63
Table 15: Assessment of impacts of exploration on soils and water (pollution)	64
Table 16: Assessment of impacts of exploration on waste generation	64
Table 17: Assessment of impacts of exploration on health & safety	65
Table 18: Assessment of the impacts of noise and vibrations	66
Table 19: Assessment of impacts of exploration on archaeology & heritage resources	66
Table 20: Assessment of closure and decommissioning of the exploration works	67

LIST OF APPENDICES

- Appendix A:** Copy of the ECC Application Form 1
- Appendix B:** Draft Environmental Management Plan (EMP)
- Appendix C:** Curricula Vitae (CV) of the Environmental Assessment Practitioners (EAPs)
- Appendix D:** Proof of Public Consultation
- Appendix E:** Consent letter from the Traditional Authority and the conservancy
- Appendix F:** Preparedness to Grant

LIST OF ABBREVIATIONS

Abbreviation	Meaning
BID	Background Information Document
CV	Curriculum Vitae
DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EDS	Excel Dynamic Solutions
ESA	Environmental Scoping Assessment

EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
GG	Government Gazette
GN	Government Notice
HPPs	Harambee Prosperity Plans
I&Aps	Interested and Affected Parties
MASL	Metres Above Sea Level
MEFT	Ministry of Environment, Forestry and Tourism
MIME	Ministry of Industries, Mines and Energy
NDP5	National Development Plan 5
PPE	Personal Protective Equipment
Reg	Regulation
RC	Reverse Circulation
S	Section
TOR	Terms of Reference

DEFINITION OF TERMS

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	That 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.
Decision-maker	The person(s) entrusted with the responsibility for allocating resources or granting approval to a proposal.
Ecological Processes	Processes that 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 the 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 may have significant environmental effects are to be mitigated, controlled, and monitored.
Exclusive Prospecting Licence	It is a license that confers exclusive mineral prospecting rights over land of up to 1000 km ² in size for an initial period of three years, renewable twice for a maximum of two years at a time
Interested and Affected Party (I&AP)	About the assessment of a listed activity includes - (a) any person, group of persons or organization interested in or affected by activity; and (b) any organ of state that may have jurisdiction over any aspect of the activity.
Proponent	As defined in the Environmental Management Act, a person who proposes to undertake a listed activity.
Mitigate -	Practical measures to reduce adverse impacts.

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	All of the animals that are found in a given area.
Flora	All of the plants found in a given 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).
Nomadic Pastoralism	Nomadic pastoralists live in societies in which the husbandry of grazing animals is viewed as an ideal way of making a living and the regular movement of all or part of the society is considered a normal and natural part of life. Pastoral nomadism is commonly found where climatic conditions produce seasonal pastures but cannot support sustained agriculture.
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)

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.
Terms of Reference (ToR)	Written requirements governing full EIA input and implementation, consultations to be held, data to be produced and form/contents of the EIA report. Often produced as an output from scoping.

1 INTRODUCTION

1.1 Project Background

Excel Dynamic Solutions (Pty) Ltd (The Consultant) was appointed by **Pointe Noire Investments CC** (The Proponent) to act on their behalf in obtaining the Environmental Clearance Certificate (ECC) for prospecting and exploration activities on Exclusive Prospecting License (EPL) No.10011. The 7644.5566 ha EPL is located west of Brandberg mountain, about 68 km north - west from Uis, in the Erongo region (Daures constituency) (see **figure 1**). EPL No. 10011 (center coordinates; -21.049239, 14.328247) lies in a communal land, within the Tsiseb conservancy (**figure 2**). The Proponent intends to prospect and explore for the following commodities: Base& Rare Metals, Industrial Minerals, Precious Metals and Precious stones.

Section 27 (1) of the Environmental Management Act (EMA) (No. 7 of 2007) and its 2012 Environmental Impact Assessment (EIA) Regulations, provides a list of activities that may not be carried out without an EIA undertaken and an ECC obtained. Exploration activities are listed among activities that may not occur without an ECC. Therefore, no individuals or organizations may carry out exploration activities without an ECC awarded.

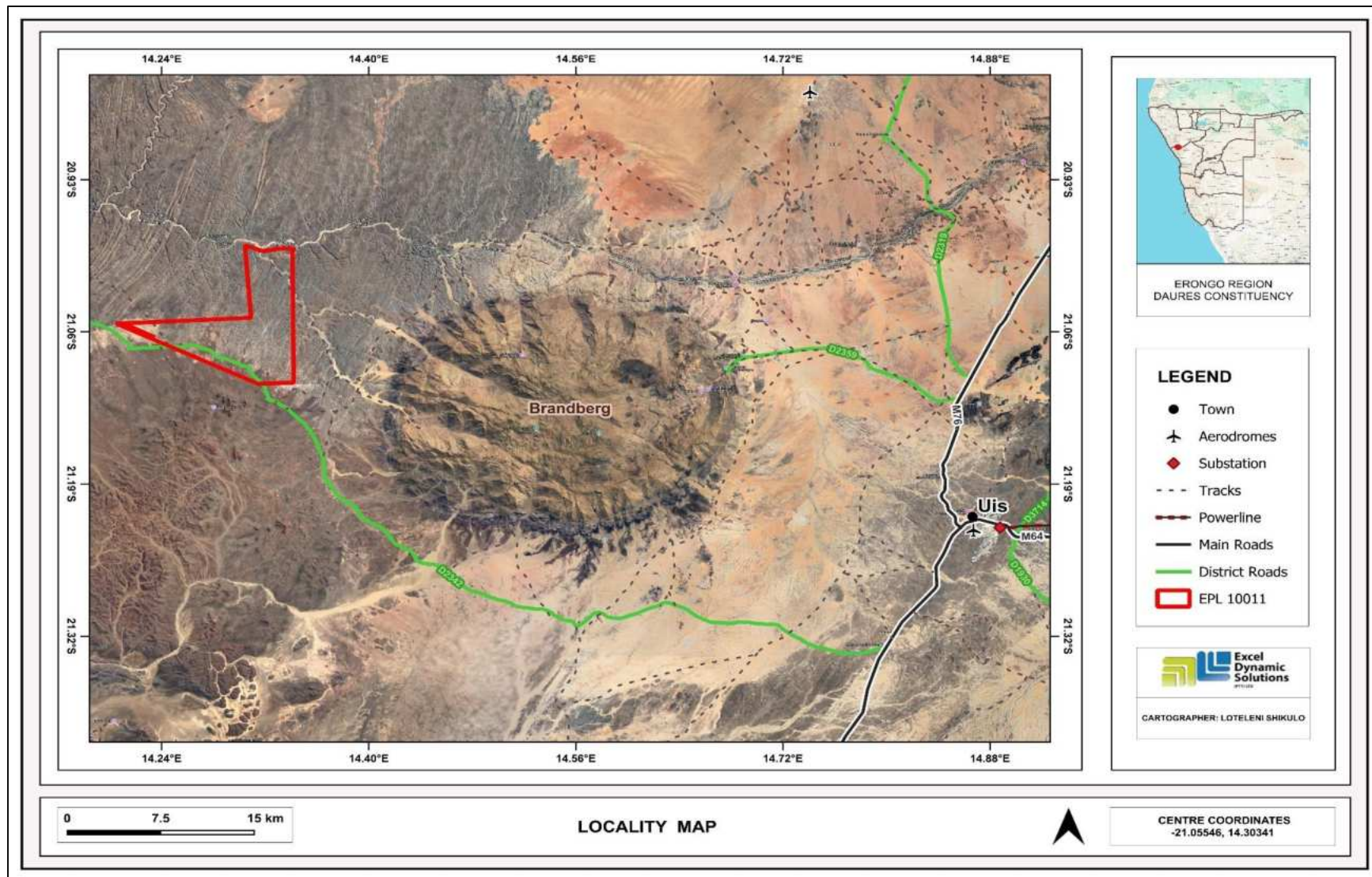


Figure 1: EPL No. 10011 locality Map

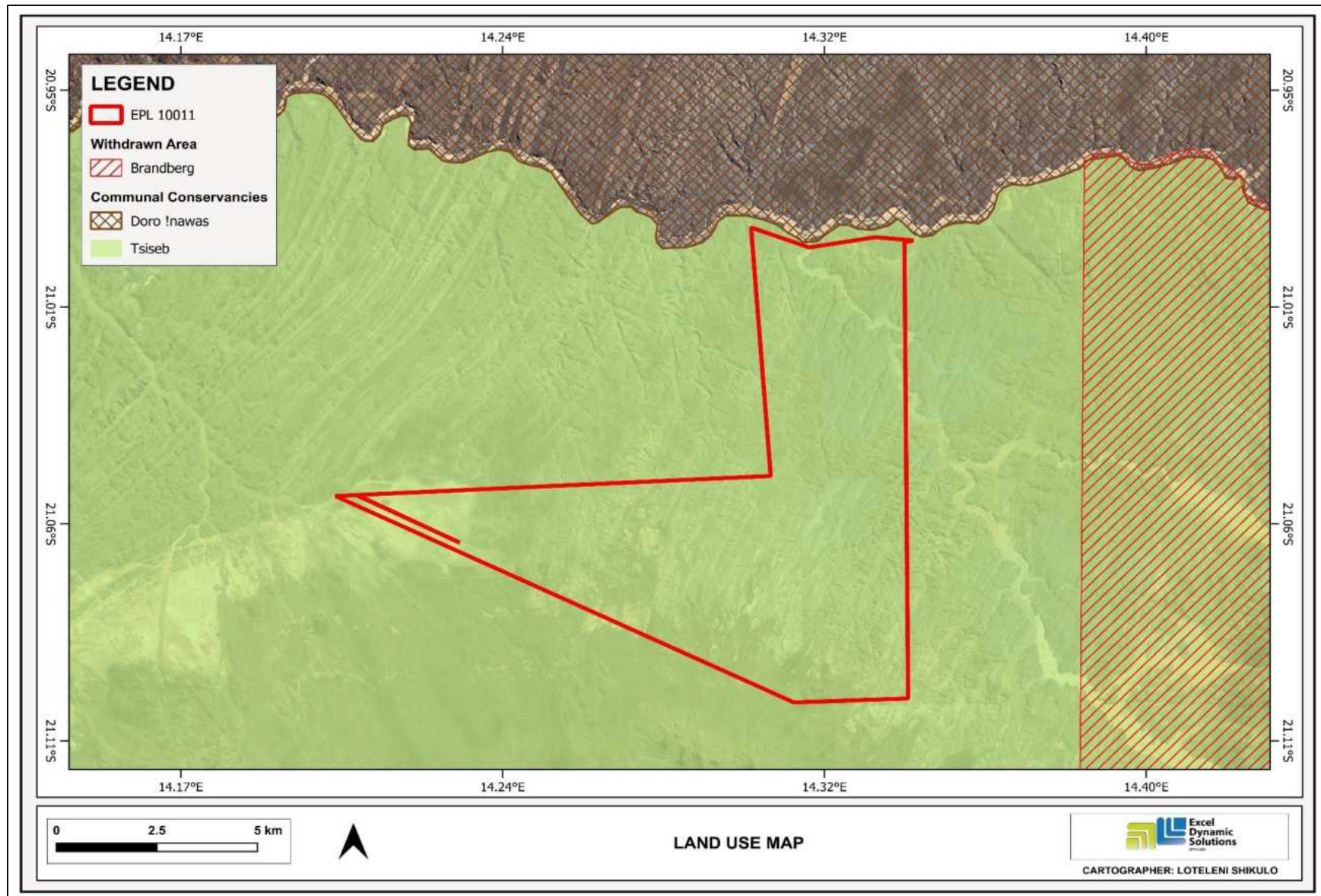


Figure 2: Land use map around EPL No. 10011

1.2 Terms of Reference, Scope of Works and Appointed EA Practitioner

To satisfy the requirements of the EMA no 7 of 2007 and its 2012 EIA Regulations, the Proponent, **Pointe Noire Investments CC** appointed Excel Dynamic Solutions Pty Ltd (EDS) to conduct the required Environmental Assessment (EA) process on their (Proponent's) behalf, and thereafter, apply for an ECC for exploration works on the EPL. There were no formal Terms of Reference (ToR) provided to EDS by the Proponent. The consultant, instead, relied on the requirements of the Environmental Management Act (No. 7 of 2007) (EMA) and its EIA Regulations (GN. No. 30 of 2012) to conduct the study.

The application for the ECC (**Appendix A**) is compiled and submitted to the Ministry of Environment, Forestry and Tourism (MEFT), the environmental custodian for project registration purposes. Upon submission of an Environmental Scoping Assessment (ESA) Report and Draft Environmental Management Plan (EMP) (**Appendix B**), an ECC for the proposed project may be considered by the Environmental Commissioner at the MEFT's Department of Environmental Affairs and Forestry (DEAF).

The EIA project is headed by Ms. Aili lipinge, a qualified and experienced Environmental Assessment Practitioner (EAP). The consultation and reporting were conducted by Ms. Aili lipinge and Ms. Milika Dineinge respectively. The CVs of Ms. Dineinge and Ms. lipinge are presented in **Appendix C**.

1.3 Motivation for the Proposed Project

The mining sector yields foreign exchange and accounts for a significant portion of the Namibian Gross Domestic Product (GDP). This sector is one of the largest contributors to the Namibian economy as it contributes to the improvement of the local livelihoods through the provision of temporary job opportunities and by maintaining local business through purchasing done at the local and the nearby town (Nyambe and Amunkete, 2009). Additionally, Exploration activities have a great potential to enhance and contribute to the development of other sectors, and its activities eventually contribute to generation of taxes that fund social infrastructural development. Additionally, the industry produces a trained workforce and small businesses that can serve communities and may initiate related businesses. Exploration fosters several associated activities such as manufacturing of exploration and mining equipment, provision of engineering as well as environmental services. Equally important, the mining sector forms a vital part of some of Namibia's development plans - Vision 2030, National Development Plan 5 (NDP5), and

Harambee Prosperity Plans (HPPs) I and II. Mining is essential to the development goals of Namibia in contributing to meeting the ever-increasing global demand for minerals, and for national prosperity. Successful exploration on EPL No. 10011 would lead to the mining of the target minerals, which would contribute towards achieving the goals of the national development plans.

2 PROJECT DESCRIPTION: PROPOSED EXPLORATION ACTIVITY

Prospecting and exploration for minerals are the first components of any potential mining project. These are carried out to acquire the necessary data required for further decision making and investment options. These activities are expected to last for about three (3) years. The exploration process includes three phases, namely, prospecting, exploration, and the decommissioning of works.

2.1 Prospecting Phase (Non- Invasive Techniques)

2.1.1 Desktop Study

This mainly entails a desktop review of historical geological work done on the EPL, including regional mapping of the targeted district, acquisition of existing geophysical and geochemical data sets, familiarization with past studies of the project area and creating relationships with landowners and local authorities for land access.

- **Geophysical surveys**

Geophysical surveys entail data collection of the substrata by air or ground, through sensors such as radar, magnetic and/or electromagnetic sensors, to detect and ascertain possible mineralization in the area. Ground geophysical surveys shall be conducted, where necessary, using vehicle-mounted sensors or handheld by staff members, while in the case of air-borne surveys, the sensors are mounted to an aircraft, which navigates over the target area.

2.1.2 Lithology geochemical surveys

Rock and soil samples shall be collected and taken for trace element analysis at analytical chemistry laboratories to determine the existence, the grade (concentration) and the regional extent of mineralization on the EPL. Additionally, trenches or pits may be dug depending on the

commodity (in a controlled environment e.g., fencing off and labeling activity sites), using either manual techniques (jack hammers) or excavators to further investigate the mineral potential.

Soil sampling entails digging of small, about 20 cm deep pits along survey lines, where 1kg of sample material is extracted and sieved for finer grain-size to collect about 50g of very fine soil from it, representing the entire sample. As necessary, and to ensure adequate risk mitigation, all major excavations will be closed immediately after obtaining the samples needed, or the sites will be secured until the trenches or pits are closed. The landowner and other relevant stakeholders will be engaged to obtain authorization where necessary.

2.2 Exploration Phase (Invasive Techniques)

The selection of the potential mineralization model and exploration targets will be based on the local geology, the trenching, drilling, and assay results of the samples collected. The planned exploration activities are aimed at delineating the mineral deposits and determining whether the deposits are economically feasible mining resources.

No explosives will be used during the exploration phase.

2.2.1 Detailed Exploration (Drilling)

If the analysis by an analytical laboratory yields positive results, drilling targets will be defined, drilled and subsurface. Samples will again be collected for further analysis. This determines the depth of the potential mineralization. If necessary, new access tracks to the drill sites will be created and drill pads at which to set up the rig will be cleared. Two widely used drilling options may be adopted - the Reverse Circulation (RC) drilling method and/or the Diamond (Core) drilling method. The RC drilling method uses a pneumatic hammer, which drives a rotating tungsten-steel bit. RC Drilling produces an uncontaminated large volume sample, which comprises 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.

A typical RC drilling team is made up of 4-5 people (rig operator and assistants), a drilling rig carrying a compressor, a support truck with the drill pipes, 2-3 4x4 vehicles and a water bowser. All geological samples and drill cores will be stored temporarily at the driller's field camp. This camp may also be used as a place to park, maintain field vehicles, and the provision of storage facilities for fuel and lubricants.

Other aspects of the proposed exploration operations include:

2.3 Site accessibility

The EPL is accessible via D 2342 district road that diverts from the C 35 main road from Uis (see figure 1). Project-related vehicles will make use of these existing roads to access the EPL.

All sites particularly the basecamp and drill sites shall be accessed through existing tracks as far as practical. However, given the topography of the project site, it is likely that new, but few tracks will be created to ensure easy access to drill sites and project specific target areas. Overall, all vehicles must use existing road tracks, and all new access routes to the drill sites should be identified and agreed upon with the relevant stakeholders.

2.3.1 Material, vehicles and Equipment

A drilling supporting truck, 4X4 vehicles, an excavator/front-end loader, a dozer, an air compressor, drilling fluids stored in manufacturers approved containers, and a generator for power supply will be required for the proposed project.

After the completion of exploration works, the disturbed sites will be rehabilitated to their pre-exploration phase as far as practically possible. This will include backfilling of exploration trenches, boreholes, leveling of stockpiled topsoil, and cleaning of site areas.

2.3.2 Services and Infrastructure

- **Water:** Water for the exploration operations on the EPL will be obtained from the nearest existing boreholes, or the proponent will drill boreholes for water within the EPL, upon obtaining necessary permits and signed agreements with the landowners in the area. Estimated monthly water consumptions are at 4 500 liters. This includes water for drinking, sanitation, cooking, dust control (if necessary), drilling, as well as washing of equipment.
- **Power supply:** Power required during the operation phase will be provided from diesel-generators. About 3000 litres of diesel might be used daily.
- **Fuel (diesel for generators and other equipment):** The fuel (diesel) required for exploration equipment will be stored in a tank mounted on a mobile trailer. Drip trays will be readily available and monitored to ensure that accidental fuel spills are cleaned up as soon as they have been detected/observed. Fuel may also be stored in a bunded diesel bowser on site, and in jerry cans placed on plastic sheeting to avoid unnecessary contamination of soils.

2.3.3 Waste Management

The site will be equipped with secured waste bins for each type of waste (i.e., domestic, hazardous, and recyclable). Depending on the amount generated, waste will be sorted and

collected as regularly as possible and taken to the nearest certified landfill site. An agreement will need to be reached with different waste management facility operators/owners and authorization or permits will be obtained prior to utilizing these facilities, in the case of production of any hazardous waste.

- **Sanitation and human waste:** Mobile chemical ablution facilities will be provided on-site. Sewage waste will be disposed of appropriately as per instructions of the facility manufacturer.
- **Hazardous waste:** The waste fuel/oils will be carefully stored in a standardized container for disposal at an approved hazardous waste management facility in the nearest Town.

Waste produced on-site can also be categorized as mineral or non-mineral waste:

- **Mineral Waste:** Consists of solid products of exploration and mineral concentration to acquire the targeted minerals. Mineral waste will potentially be produced throughout the exploration phase. This waste will be stripped and dumped in allocated areas as stipulated in the EMP.
- **Non-mineral Waste:** Consists primarily of auxiliary materials that will support the exploration phase. This includes but is not limited to items such as empty containers, plastic, etc., and other domestic waste. This waste will be collected, sorted, and taken to the dumpsite as regularly as necessary.

2.3.4 Safety and Security

- **Storage Site:** Temporary storage areas for exploration material, equipment, and machinery will be required at the campsite and/or exploration sites. Security will be supplied on a 24-hour basis at the delegated sites for storage. A temporary support fence surrounding the storage site will be constructed to ensure people and domestic animals are not put at risk.
- **Fire management:** Basic firefighting equipment, i.e., fire extinguishers, will be readily available in vehicles, at the working sites and at the camping site. The exploration crew is required to have the contact details of the nearest fire station at hand in case of a larger scale of fires at site, in particular “veld” or bush fires, which can spread rapidly over large areas.
- **Health and Safety:** Adequate and appropriate Personal Protective Equipment (PPE) will be provided by the Proponent to every project personnel while working at site. A first aid kit will be readily available on site and at the camping area to avoid potential injuries.

2.3.5 Accommodation

These employees will be accommodated in fenced off tented camps within the EPL, but this will be done upon agreement with the relevant authority and landowners. Alternatively, the employees

can also be accommodated in Uis. Exploration activities will take place during the daytime only and staff will commute between the exploration site(s) and the campsite.

2.4 Decommissioning and Rehabilitation Phase

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. An unfavorable 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 that the project activities cease in an environmentally friendly manner and the sites are rehabilitated.

3 PROJECT ALTERNATIVES

Alternatives are defined as the “different means of meeting the general purpose and requirements of the activity” (EMA, 2007). This section highlights the different ways in which the project can be undertaken, and identifies alternatives that may be the most practical, but least damaging to the environment.

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?

3.1 Types of Alternatives Considered

3.1.1 The "No-go" Alternative

The “no action” alternative implies that the status quo remains. 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 would remain unchanged.

This no-go option is considered and a comparative assessment of the environmental and socio-economic impacts of the “no action” alternative, is undertaken to establish what benefits might be lost if the project is not implemented. The key losses that may never be realized if the proposed project does not go ahead include:

- Loss of foreign direct investment.
- About ten (5 to 10) temporary job opportunities for community members will not be realized.
- No realization of local business supports through the procurement of consumable items such as Personal Protective Equipment (PPE), machinery spare parts, lubricants, accommodation and catering services etc.
- Loss of potential income to the local and national government through land lease fees, license fees, and various tax structures.
- No improved geological understanding of the site area regarding the targeted commodities.
- Socio-economic benefits such as skills acquisition to local community members would be not realized.

Considering the above losses, the “no-action/go” alternative may not necessarily be considered a viable option for this project, although, in the case where parts of the project site are considered environmentally sensitive and/or protected, one or several sections of the site may be identified as no-go zones.

3.1.2 Exploration Location

The prospecting/exploration location is dependent on the geological setting (regional and local), the economic geology, and the exploration and mining history of the EPL area. Therefore, finding an alternative location for the planned exploration activities is not possible. This means that the mineralization of the target commodities is area-specific, and exploration targets are primarily determined by the geology (host rocks) and the tectonic environment of the site (an ore-forming mechanism). The tenement has sufficient surface area for future related facilities, should an economic mineral deposit be defined.

Furthermore, the national mineral resources’ potential locations are also mapped and categorized by the Ministry of Mines, Energy and Industry (MMEI), on Exclusive Prospecting Licenses (EPLs),

mining licenses (MLs), claims, mineral deposit retention licenses, reconnaissance licenses, and exclusive reconnaissance licenses. Available information on EPL No. 10011 (**Figure 3**), and other licenses are available on the Namibia MIME Cadastre Map Portal at <https://maps.landfolio.com/Namibia/>.

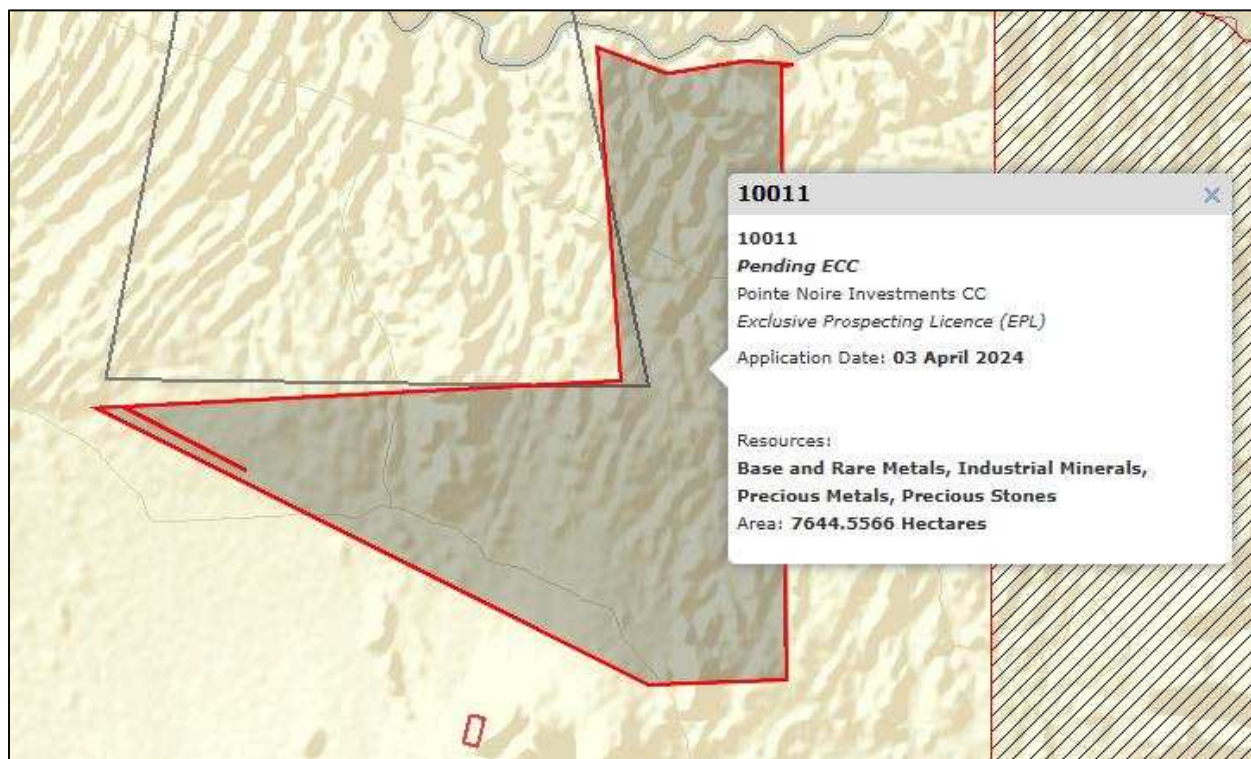


Figure 3: Location of EPL 10011 (National Mining Cadastre)

3.1.3 Exploration Methods

Invasive and non-invasive exploration techniques are expected to be used for exploration works. If an economically viable discovery is made, the project will proceed to the mining phase upon approval of a mining ECC and issuance of a mining license. If any other alternative viable exploration methods are found to achieve the purpose more effectively and/or efficiently without aggravating any environmental measures put in place, they can be implemented. **Table 1** shows the exploration methods that will be employed during the exploration phase.

Table 1: Alternatives (Exploration Methods)

Invasive Exploration Method (Alternatives Considered)	Process	Advantages
Pitting and trenching	<p>-Pits and trenches can be a quick, cheap way of obtaining lithological and structural information in areas of shallow cover.</p> <p>-Pitting is usually employed to test shallow, extensive, flat-lying bodies of mineralization such as a buried heavy mineral placer.</p> <p>-The main advantage of pitting over a pattern-drill programme on the same deposit is that pits can provide a very large volume sample. Large sample sizes are necessary to overcome problems of variable grade distribution, which are a characteristic feature of such deposits.</p> <p>-Trenches are usually employed to expose steep dipping bedrock buried below shallow overburden and are normally dug across the strike of the rocks or mineral zone being tested (Marjoribanks, 1997).</p>	<p>- Quick, cheap way of obtaining lithological and structural information in areas of shallow cover.</p> <p>-Pits can provide a very large volume sample. Large sample sizes are necessary to overcome problems of variable grade distribution, which are a characteristic feature of such deposits.</p> <p>-Trenches are an excellent adjunct to RC drilling programmes, where the structural data from trench mapping are needed to complement the lithological information obtained from the drill cuttings (Marjoribanks, 1997).</p>

Invasive Exploration Method (Alternatives Considered)	Process	Advantages
Reverse Circulation (RC) Drilling	<p>-Crushed rock is collected in the form of drill chips and powdered samples, brought to surface through the drilling rods by compressed air. This is in contrast to conventional drilling (Rotary Air Blow Drilling) that puts the air inside the rods and the cuttings outside. Here the air passes downwards through the annular space between the inner shaft and the outer tube.</p> <p>-Water is often used down the hole to cool the drill bit and reduce dust as well as assisting with the transportation of sample bits to the surface.</p> <p>-RC drilling is designed for drilling through and crushing hard rock.</p> <p>-RC drilling is fundamentally different from diamond drilling, both in terms of equipment and sampling. One major difference is that RC drilling creates small rock chips instead of solid core.</p> <p>The RC method:</p> <p>-Allows full recovery of samples continuously</p> <p>-Quick installation</p>	<p>-Compared to diamond drilling, RC requires less water. Therefore, RC drilling will put less pressure on water supply and use.</p> <p>The major differences between RC and diamond drilling are in the rate of penetration and cost per meter. RC drilling is much faster than diamond core drilling, and much less expensive.</p> <p>-Unlike diamond drilling, this process creates rock chips that can be analysed, rather than a solid, cylindrical piece of rock.</p> <p>-Some types of information, such as structural details, are not possible to obtain in the absence of solid rock. Despite this disadvantage, much valuable information can still be obtained from the rock chips. For example, the chips are much easier to examine under a microscope. Testing of fluorescence</p>

Invasive Exploration Method (Alternatives Considered)	Process	Advantages
	<p>-There is no contact between the walls and cuttings taken at the bottom.</p> <p>-The penetration rate is fast (Technidril, 2020)</p>	<p>and effervescence are easily accomplished (Earth Science Australia, 2020).</p> <p>It is for these reasons that RC will be the most preferred method and is mainly used. However, RC drilling would be combined with Diamond drilling where necessary for more reliable data collection and analysis. Diamond drilling would be more applicable where deeper holes are required than is possible using RC drilling. In-fill drilling would also be applied to support an update to a higher classification of the Mineral Resources estimate.</p>
Infill drilling	<p>The progress of an exploration project mostly depends on the result of the primary boreholes. Therefore, primary exploration boreholes must intersect high-grade mineralization zones with considerable thickness. On the other hand, the infill boreholes are designed based on obtained results from the primary boreholes (Fatehi, <i>et al.</i>, 2017). Therefore, infill drilling is intended to support an update to a higher classification of the Mineral Resource estimate. The metallurgical test-work results will improve understanding of blending designs in the exploration schedules for the product offtake specifications (Canyon Resources, 2021).</p>	

Invasive Exploration Method (Alternatives Considered)	Process	Advantages
Diamond drilling (Core)	<p>-Diamond drilling uses a diamond bit, which rotates at the end of a drill rod (or pipe). The opening at the end of the diamond bit allows a solid column of rock to move up into the drill pipe and be recovered at the surface.</p> <p>-The diamond bit is rotated slowly with gentle pressure while being lubricated with water (“mud circulation”) to prevent overheating. As a result, this drilling method is known to use a huge amount of water compared to RC, thus may put pressure on water supply sources.</p> <p>- Drill cuttings obtained with RC drilling can be analysed directly to provide a limited amount of information, and their locations are less precise. Core samples, on the other hand, will identify actual veins of materials and give you their precise location (BG Drilling, 2016). Therefore, for accuracy's sake, diamond drilling would provide better result. In other words, RC results are reliable but may not be accurate.</p> <p>- As diamond is one of the strongest materials in the world, it has no trouble drilling through most surfaces. Therefore, it works well across a wider range of ground types and conditions.</p>	

Invasive Exploration Method (Alternatives Considered)	Process	Advantages
	<ul style="list-style-type: none"> -Time-consuming and more effort is required to obtain the drill core. -Low initial investment, but generally more expensive to meters drilled because of the limitation of the speed. 	

The final drilling technique would be determined by the mineralization type. However, based on the information presented in the table above regarding the detailed exploration methods, it was found and pre-determined that Reverse Circulation (RC) drilling would be preferable as much as possible given its efficiency in terms of costs, operating speed and environmental friendliness (water demand), compared to Diamond drilling.

Although RC drilling is known to have its shortcomings, particularly the lack of solid drill recovery and inaccuracy, it is usually combined with Diamond drilling for the exploration of some minerals, if the borehole(s) needs to be deeper than what RC can achieve.

4 LEGAL FRAMEWORK: LEGISLATION, POLICIES, AND GUIDELINES

Prospecting and exploration activities have legal implications associated with certain applicable legal standards. A summary of applicable and relevant international policies and Namibian legislation, policies, and guidelines for the proposed development is given in this section (**Table 2**). This summary further serves to inform the project Proponent, Interested and Affected Parties (I & APS), and the decision-makers at the DEAF, about 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 The Environmental Management Act (No. 7 of 2007)

This EIA is carried out according to the Environmental Management Act no. 7 of 2007 (EMA) and its Environmental Impact Assessment (EIA) Regulations (GG No. 4878 GN No. 30).

The EMA has stipulated requirements to complete the required documentation to obtain an ECC for permission to undertake certain listed activities. These activities are listed under the following Regulations:

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 forms 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 Environmental Impact Assessment (EIA) Regulations GN 28-30 (GG 4878) detail requirements for public consultation within a given environmental assessment process (GN 30 S21). The EIA regulations also outline the required details of a Scoping Report (GN 30 S8) and an Assessment Report (GN 30 S15).

Other legal obligations that are relevant to the proposed activities of EPL No. 10011 and related activities are presented in **Table 2**.

Table 2: Applicable Legal Standards, Policies and Guidelines

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
<p>The Constitution of the Republic of Namibia, 1990 as amended:</p> <p>Government of the Republic of Namibia</p>	<p>The Constitution of the Republic of Namibia (1990 as amended) addresses matters relating to environmental protection and sustainable development. Article 91(c) defines the functions of the Ombudsman to include:</p> <p>“...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...”</p> <p>Article 95(l) commits the state to actively promoting and maintaining the welfare of the people by adopting policies aimed at the:</p> <p>“...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.”</p>	<p>By implementing the environmental management plan, the establishment will be in conformant to the constitution in terms of environmental management and sustainability.</p> <p>Ecological sustainability will be main priority for the proposed development.</p>
<p>Minerals (Prospecting and Mining) Act (No. 33 of 1992): Ministry of Industries, Mines and Energy (MIME)</p>	<p>Section 52 requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder.</p> <p>Section 52(1) clarifies that a mineral licence holder may not exercise his/her rights in any town or village, on or in a proclaimed road, land utilised for cultivation, within 100m of any water resource (borehole, dam, spring, drinking trough etc.) and boreholes, or no operations in municipal areas, etc.), which</p>	<p>The Proponent should enter into a written agreement with landowners before carrying out exploration on their land.</p>

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
	<p>should individually be checked to ensure compliance.</p> <p>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.</p> <p>Section 68 stipulates that an application for an exclusive prospecting license (EPL) 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 measures to be taken to prevent or minimize any such effect.</p> <p>Section 91 requires that rehabilitation measures should be included in an application for a mineral license.</p>	<p>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 mineral exploration activities.</p> <p>The Proponent may not carry out exploration activities within the areas limited by Section 52 (1) of this Act.</p>
<p>Nature Conservation Amendment Act, No. 3 of 2017: Ministry of Environment, Forestry and Tourism (MEFT)</p>	<p>National Parks are established and gazetted in accordance with the Nature Conservation Ordinance, 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.</p>	<p>The Proponent will be required to enhance the conservation of biodiversity and the maintenance of the ecological integrity Project Site area.</p> <p>The Proponent will also be required to comply with the existing and planned local operational management plans, regulations and guidelines.</p>

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
The Parks and Wildlife Management Bill of 2008: Ministry of Environment, Forestry and Tourism (MEFT)	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.	
Mine Health & Safety Regulations, 10th Draft: Ministry of Health and Social Services (MHSS)	Makes provision for the health and safety of persons employed or otherwise present in mineral licenses areas. 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 relevant regulations with respect to their employees.
Petroleum Products and Energy Act (No. 13 of 1990) Regulations (2001): Ministry of Industries, Mines, and Energy (MIME)	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 MMEI for the storage of fuel on-site.
The Regional Councils Act (No. 22 of 1992): Ministry of Urban and Rural Development (MURD)	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 perspective, 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,	The relevant Regional Councils are IAPs and must be consulted during the Environmental Assessment (EA) process. The project site falls under the Erongo Regional Councils ; therefore, they should be consulted.

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
	economic development potential, infrastructure, land utilisation pattern and sensitivity of the natural environment.	
Local Authorities Act No. 23 of 1992	To provide for the determination, for purposes of local government, of local authority councils; the establishment of such local authority councils; and to define the powers, duties and functions of local authority councils; and to provide for incidental matters.	The Uis Settlement Office is the responsible Local Authority of the area therefore they should be consulted.
Traditional Authority Act (Act No. 25 of 2000)	<p>Namibian legislation recognizes both statutory and customary forms of governance. The Traditional Authorities Act recognizes Traditional Authorities (TAs), as the customary leadership of traditional communities as legal entities.</p> <p>The primary functions of these authorities are to promote peace and welfare amongst the community members, as well as to supervise and ensure the observance of the customary law of that community by its members.</p> <p>The Act also stipulates that 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 leaderships, the Chiefs, to exercise control on behalf of the state and the residents in their designated area.</p>	The EPL is in a communal area, under the Dâure Daman Traditional Authority (TA) . As such, this TA is a key I&AP and will therefore be provided with the opportunity to comment on the proposed project and issue a consent letter.
Water Act 54 of 1956: Ministry of	The Water Resources Management Act 11 of 2013 is presently without regulations;	The protection (quality and quantity/abstraction)

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
Agriculture, Fisheries, Water and Land Reform (MAFWLR)	<p>therefore, the Water Act No 54 of 1956 is still in force:</p> <p>It prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duty of care to prevent pollution (S3 (k)).</p> <p>The Act provides for control and protection of groundwater (S66 (1), (d (ii)).</p> <p>It also regulates liability for clean-up costs after closure/abandonment of an activity (S3 (l)). (l)).</p>	<p>of water resources should be a priority.</p> <p>The permits and license required thereto should be obtained from MAFWLR's relevant Departments (these permits include Borehole Drilling Permits, Groundwater Abstraction & Use Permits, and when required, the Wastewater / Effluent Discharge Permits).</p>
Water Resources Management Act (No 11 of 2013): Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)	<p>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:</p> <p>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 (S68).</p>	
National Heritage Act No. 27 of 2004: Minister of Education, Innovation, Youth, Sport, Arts and Culture	<p>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.</p>	<p>The Proponent should ensure compliance with this Acts' requirements. The necessary management measures and related permitting requirements must be</p>

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
The National Monuments Act (No. 28 of 1969): Minister of Education, Innovation, Youth, Sport, Arts and Culture	The Act enables the proclamation of national monuments and protects archaeological sites.	taken. This to be done by consulting with the National Heritage Council (NHC) of Namibia. The management measures should be incorporated into the Draft EMP.
Soil Conservation Act (No 76 of 1969): Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)	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): Ministry of Environment, Forestry and Tourism (MEFT)	The Act provides for the management and use of forests and forest products. 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."	The proponent will apply for the relevant permit under this Act if it becomes necessary.
Public Health Act (No. 36 of 1919): Ministry of Health and Social Services (MHSS)	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	The Proponent and all its employees should ensure compliance with the provisions of these legal instruments.

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
	or other condition liable to be injurious or dangerous to health.”	
Health and Safety Regulations GN 156/1997 (GG 1617): Ministry of Health and Social Services (MHSS)	Details various requirements regarding health and safety of labourers.	
Public and Environmental Health Act No. 1 of 2015: Ministry of Health and Social Services (MHSS)	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.	The Proponent should ensure that the project infrastructure, vehicles, equipment, and machinery are designed and operated in a way that is safe, or not injurious or dangerous to public health and that the noise and dust emissions which could be considered a nuisance remain at acceptable levels. Public and environmental health should be preserved and remain uncompromised.
Atmospheric Pollution Prevention Ordinance (1976): Ministry of Health and Social Services (MHSS)	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 on site.

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
Hazardous Substance Ordinance, No. 14 of 1974: Ministry of Health and Social Services (MHSS)	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
Road Traffic and Transport Act, No. 22 of 1999: Ministry of Works and Transport (Roads Authority of Namibia)	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. Should the Proponent wish to undertake activities involving road transportation or access onto existing roads, the relevant permits will be required.	Mitigation measures should be provided for, if the roads and traffic impact cannot be avoided, the relevant necessary permits must be applied for.
Labour Act (No. 6 of 1992): Ministry of Justice and Labour Relations	Ministry of Justice and Labour Relations 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.

4.2 International Policies, Principles, Standards, Treaties and Conventions

The international policies, principles, standards, treaties, and conventions applicable to the project are as listed in **Table 3** below.

Table 3: International Policies, and Principles

Statute	Provisions	Project Implications
Equator Principles	<p>A financial industry benchmark for determining, assessing, and managing environmental and social risk in projects (August 2013). The Equator Principles have been developed in conjunction with the International Finance Corporation (IFC), to establish an International Standard with which companies must comply with to apply for approved funding by Equator Principles Financial Institutions (EPFIs). The principles apply to all new project financings globally across all sectors.</p> <p>Principle 1: Review and Categorization</p> <p>Principle 2: Environmental and Social Assessment</p> <p>Principle 3: Applicable Environmental and Social Standards</p> <p>Principle 4: Environmental and Social Management System and Equator Principles Action Plan</p> <p>Principle 5: Stakeholder Engagement</p> <p>Principle 6: Grievance Mechanism</p> <p>Principle 7: Independent Review</p> <p>Principle 8: Covenants</p> <p>Principle 9: Independent Monitoring and Reporting</p> <p>Principle 10: Reporting and Transparency</p>	<p>These principles are an attempt to: ‘...encourage the development of socially responsible projects, which subscribe to appropriately responsible environmental management practices with a minimum negative impact on project-affected ecosystems and community-based upliftment and empowering interactions.’</p>
The International Finance Corporation (IFC) Performance Standards	<p>The International Finance Corporation’s (IFC) Sustainability Framework articulates the Corporation’s strategic commitment to sustainable development and is an integral part of IFC’s approach to risk management. The Sustainability Framework comprises</p>	<p>The Performance Standards are directed towards clients, providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage</p>

Statute	Provisions	Project Implications
	<p>IFC's Policy and Performance Standards on Environmental and Social Sustainability, and IFC's Access to Information Policy. The Policy on Environmental and Social Sustainability describes IFC's commitments, roles, and responsibilities related to environmental and social sustainability.</p> <p>As of 28 October 2018, there are ten (10) Performance Standards (Performance Standards on Environmental and Social Sustainability) that the IFC requires a project Proponents to meet throughout the life of an investment. These standard requirements are briefly described below.</p> <p>Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</p> <p>Performance Standard 2: Labour and Working Conditions</p> <p>Performance Standard 3: Resource Efficient and Pollution Prevention and Management</p> <p>Performance Standard 4: Community Health and Safety</p> <p>Performance Standard 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement</p> <p>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p> <p>Performance Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</p> <p>Performance Standard 8: Cultural Heritage</p> <p>Performance Standard 9: Financial Intermediaries (FIs)</p>	<p>risks and impacts as a way of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the Client (Borrower) in relation to project-level activities. In the case of its direct investments (including project and corporate finance provided through financial intermediaries), IFC requires its clients to apply the Performance Standards to manage environmental and social risks and impacts so that development opportunities are enhanced. IFC uses the Sustainability Framework along with other strategies, policies, and initiatives to direct the business activities of the Corporation to achieve its overall development objectives.</p>

Statute	Provisions	Project Implications
	<p>Performance Standard 10: Stakeholder Engagement and Information</p> <p>A full description of the IFC Standards can be obtained from</p> <p>http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards?cq_ck=1522164538151#ess1</p>	
The United Nations Convention to Combat Desertification (UNCCD) 1992	<p>Addresses land degradation in arid regions with the purpose to contribute to the conservation and sustainable use of biodiversity and the mitigation of climate change.</p> <p>The convention objective is to forge a global partnership to reverse and prevent desertification/land degradation and to mitigate the effects of drought in affected areas to support poverty reduction and environmental sustainability (United Nation Convention).</p>	The project activities should not be such that they contribute to desertification.
Convention on Biological Diversity 1992	<p>Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use.</p> <p>Promote the protection of ecosystems, natural habitats, and the maintenance of viable populations of species in natural surroundings.</p>	Removal of vegetation cover and destruction of natural habitats should be avoided and where not possible minimised.
Stockholm Declaration on the Human Environment, Stockholm (1972)	It recognizes the need for: “a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment.	Protection of natural resources and prevention of any form of pollution.

Relevant international Treaties and Protocols ratified by the Namibian Government

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

5 ENVIRONMENTAL BASELINE

The proposed project will be undertaken in specific environmental and social conditions. Understanding the pre-project conditions of the environment will aid in laying down background "information" of what was before and what would be after project. This also helps the EAP in identifying the sensitive environmental features (such as groundwater) that may need to be protected through the recommendation and effective implementation of mitigation measures. The summary of selected biophysical and social baseline information pertaining to the EPL No. 10011 area is given below.

The baseline information presented has been sourced from different reports of studies conducted in Uis settlement, in the Daures constituency and in the Erongo Region at large, where the EPL overlies. Additional information has then been obtained by the Environmental Consultant (EAP) upon site visit conducted on 14th March 2025.

5.1 Climate

The climate of an area may influence the functionality of the exploration activities on the proposed site. It is crucial to understand the climatic condition of the proposed area site to ensure that exploration activities take place at an appropriate time.

The Uis settlement is situated in an arid area (Mendelson et al., 2022). Annually, this settlement and its surroundings receives a maximum temperature of 32°C during the months of October, November and December. Whereas the average minimum temperature received is 10 °c during the months of June and July (see **figure 4**). This area receives the most rainfall of about 130 mm in February and the least rainfall of about 5 mm in September. Moreover, the month with the most average rainfall days is March with roughly 11 days of rainfall received. On the contrary, the months with no rainfall include May, June, July and August (see **figure 5**). From **figure 4 and 5**, it is visible that the months with the least or no rainfall are also the months with the lowest minimum and maximum temperatures.

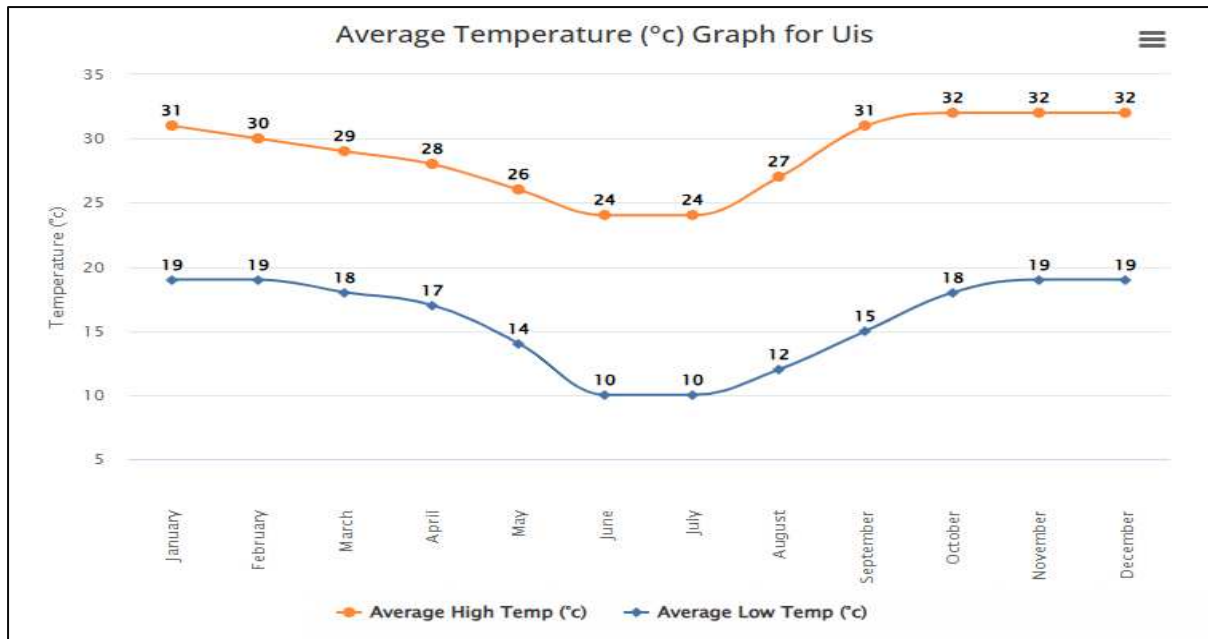


Figure 4: Maximum and minimum temperature of the Uis settlement and the surrounding area (Source: World Weather Online, 2025)

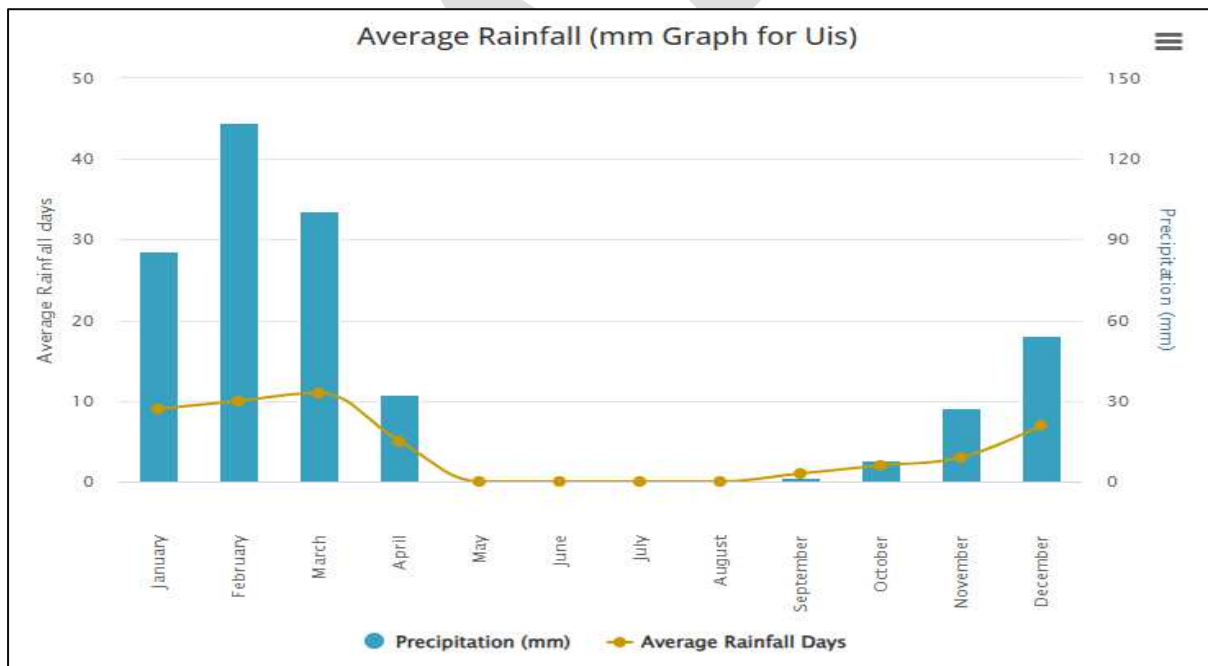


Figure 5: Rainfall data about the area surrounding EPL No. 10011 (Source: World Weather Online, 2025)

It is crucial to note that the wind blows throughout the year at the area of interest and its surroundings. Firstly, the shortest wind speed ranging between 5 – 10 km/h occurs for a few days in the months of January, March, April, May, June, July and August. The second shortest wind speed ranging between 10 – 20 km/h is frequent throughout the year, mostly occurring

during the months of May and August. The wind speed that follows ranges between 20 – 30 km/h. Like the second shortest wind speed, this wind speed also blows throughout the year, however, this wind speed is mostly dominant in the months of November, December and January. Lastly, the highest wind speed ranging between 30 – 40 km/h blows for a few days (less than two days) in July (see **figure 6**).

The wind direction is a vital indicator for aspects like where to place the temporary shade tents and camping tents during the exploration phase. The strongest and most frequent winds come from the south-southwest (SSW) direction. Additionally, the weakest and less frequent winds blow from the east, west and northern direction (see **figure 7**).



Figure 6: Wind Speed at the Uis settlement and the surrounding environment (Source: Meteoblue, 2025)

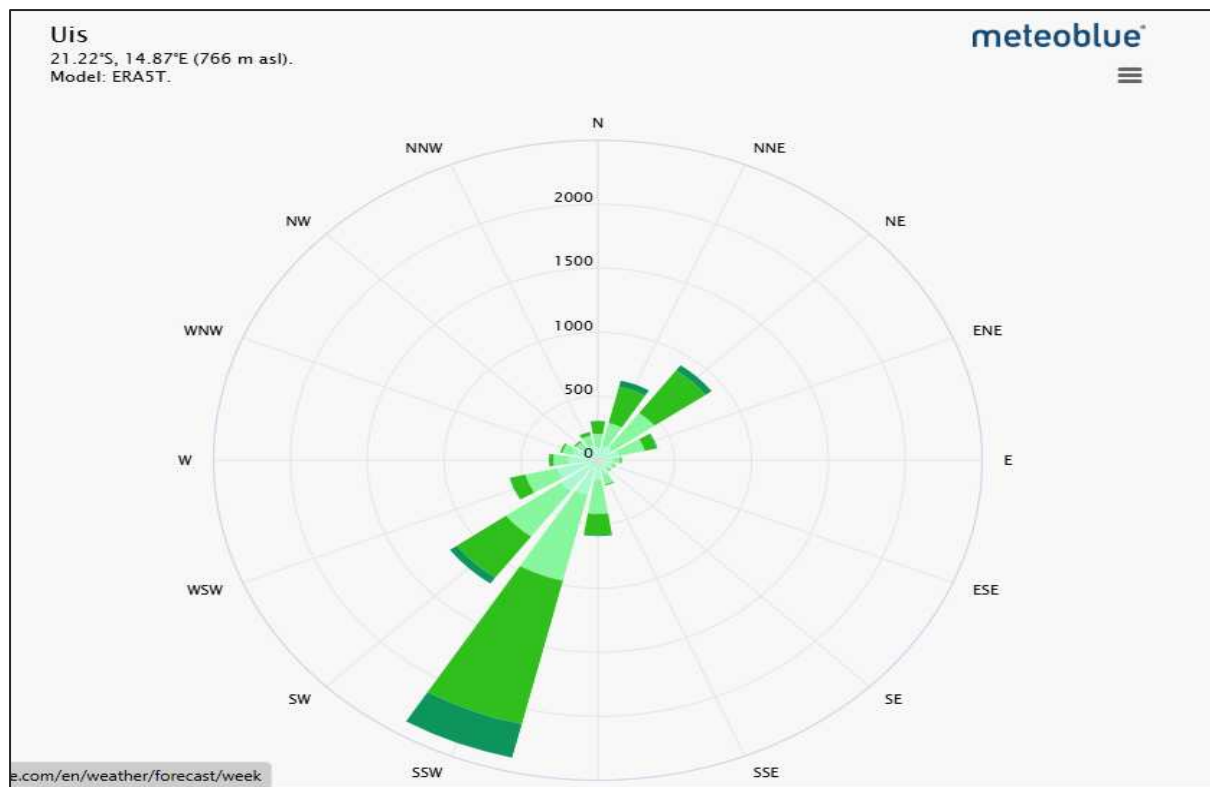


Figure 7: Wind rose for the Uis settlement and the surrounding areas (Source: Meteoblue, 2025)

5.2 Topography

Topography is defined as the forms and features of the earth's surface, such as mountains, valleys, rivers and plains (Mendelson, et al., 2022). It is significant to be aware of the topography of the EPL for navigation throughout the EPL and choosing camping sites in the EPL et cetera.

The EPL dominantly lies in the Central – western plains, while minor parts of it lies in the Etendeka Plateau (see **figure 8**). The lowest elevation value in this EPL is 188 m, while the highest is 2555 m. The EPL appears to be simultaneously flat and mountainous (see **figure 9**). The highest mountain in Namibia, the Brandberg mountain that has elevation of 2,573 m is located about 6 km south – east of the EPL. Moreover, the Ugab river a non- perennial river, runs on the northern border of the EPL. This river also separates the Erongo region and the

Kunene

region.

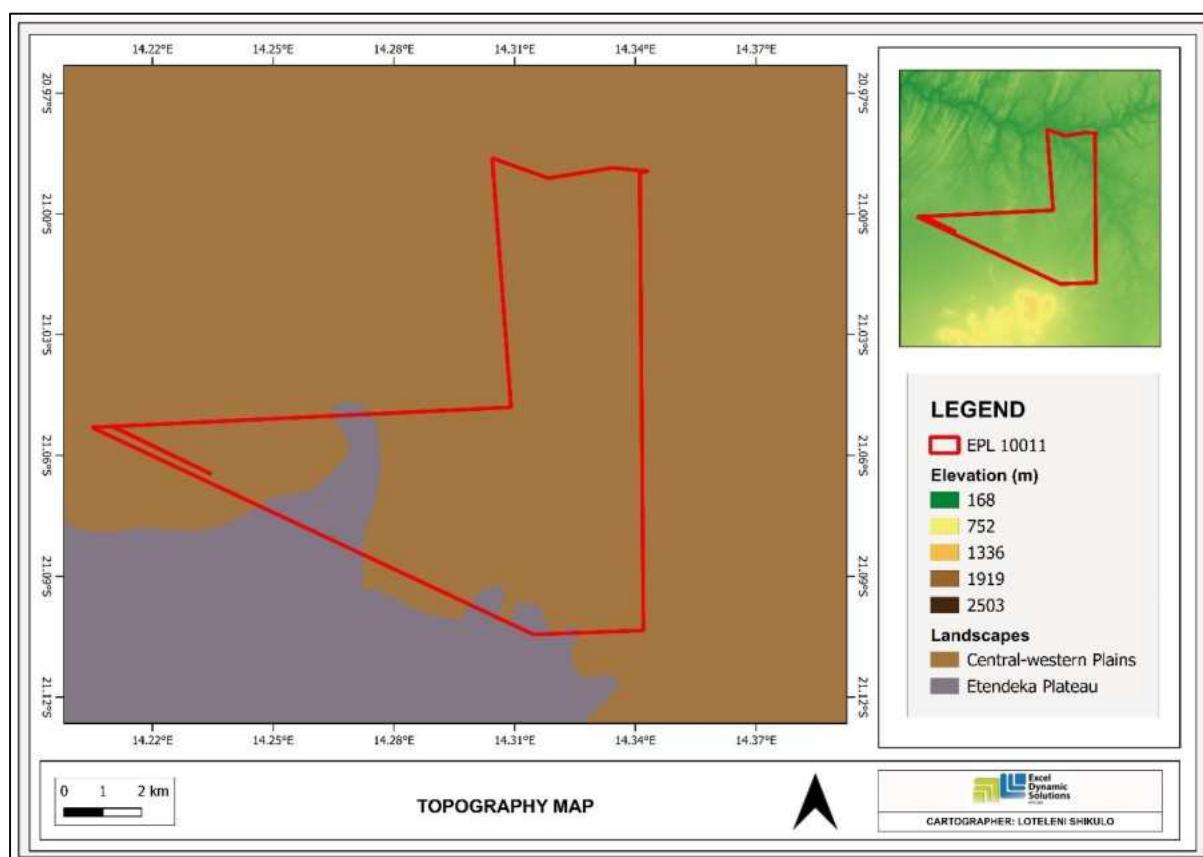


Figure 8: The topography of the area surrounding the EPL No. 10011



Figure 9: The general overview of the EPL 10011

5.3 Soils

The EPL mostly consists of Lithic Leptosols, whereas a minor part of it consists of Eutric Regosols (See **figure 10**). Generally, Regosols are young (almost undeveloped soils) with no diagnostic horizons (Mendelsohn et al., 2022). This soil type is common in areas where soil formation has been inhibited by arid conditions (Mendelsohn et al., 2022). According to Mendelsohn et al (2022), Leptosols are stony and very shallow soils. These types of soils are mostly found in hilly areas where the rate of erosion exceeds that rate of soil formation (Mendelsohn et al., 2022). A clearer picture of the soil found in the EPL is depicted in **figure 11**.

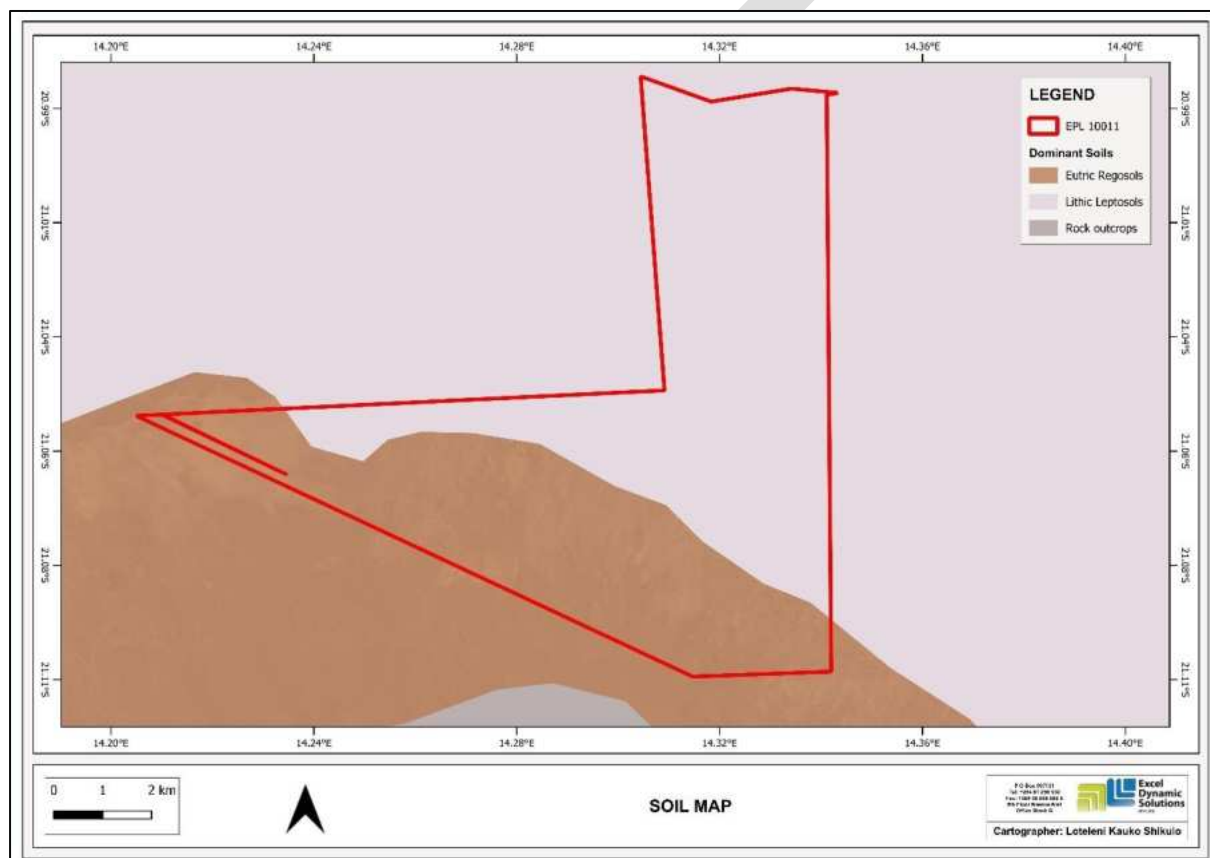


Figure 10: Soil type at the area surrounding EPL No. 10011



Figure 11: A picture depicting the soil found on site in EPL No. 10011

5.3 Geology

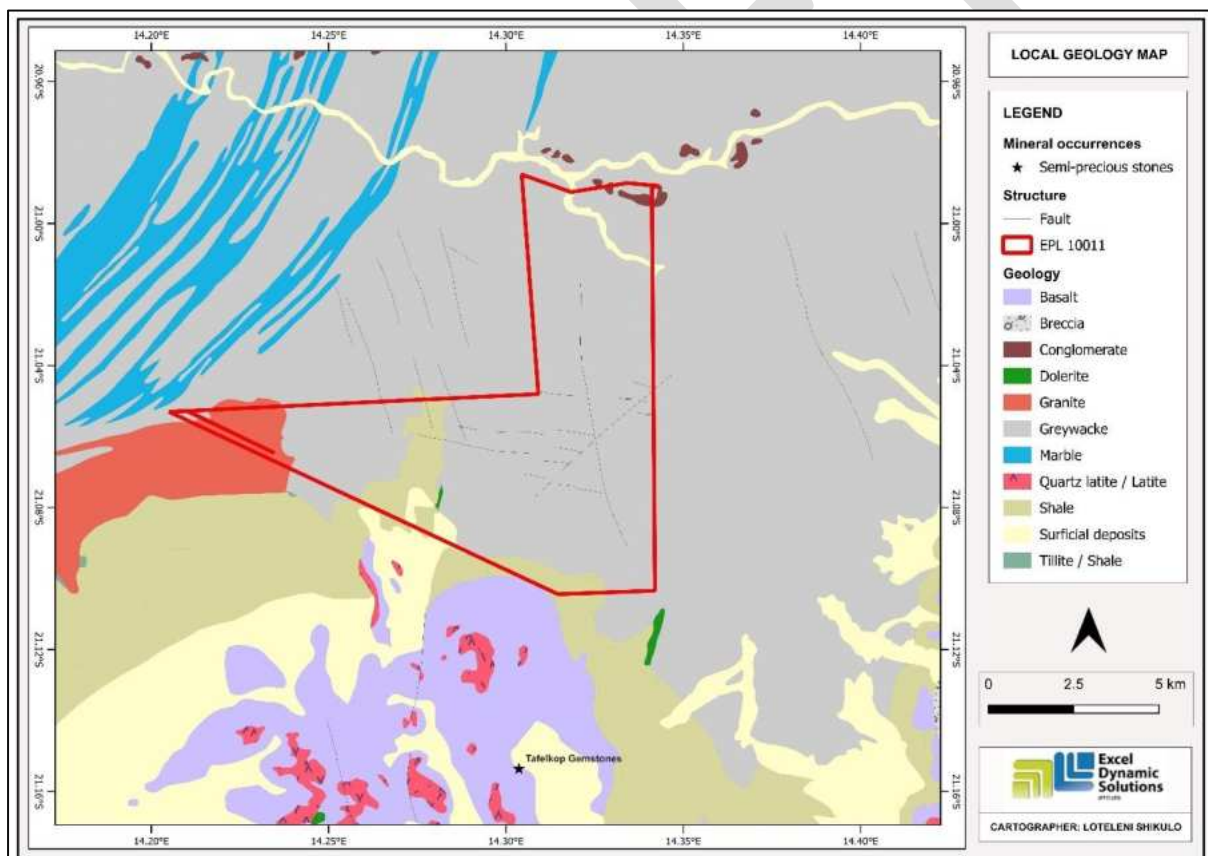


Figure 12: Geological map of the area surrounding EPL No. 10011

On a regional scale, the geology of this area is shaped by four primary geological units: the Amis River Formation, Verbrandeberg, the Rhino Wash Formation, and the Cambrian Salem

Granite. Each of these formations plays a vital role in the region's tectonic and stratigraphic history.

The geology of the desired area consists of various rock types. The majority of the EPL is underlain by granite, which corresponds to the extensive Cambrian Salem Granite intrusion that cuts through older Damaran metasediments. The majority of the EPL consists of schist, quartzite, graphitic schist, and marble outcrops align with the Amis River Formation, which was originally deposited in deep marine conditions during the Late Proterozoic (see **figure 12**). These rocks have since been metamorphosed and structurally deformed due to the Damara Orogeny, which played a key role in shaping the landscape. Outcrops of Mudstone, sandstone, siltstone, shale and limestone exists in the western side of the EPL. The map also reveals several faults cutting through the EPL, with one major fault extending from the southwestern edge towards the central portion. These structures likely influence the fluid movement and mineralization observed in the region.

5.4 Hydrology and water resources

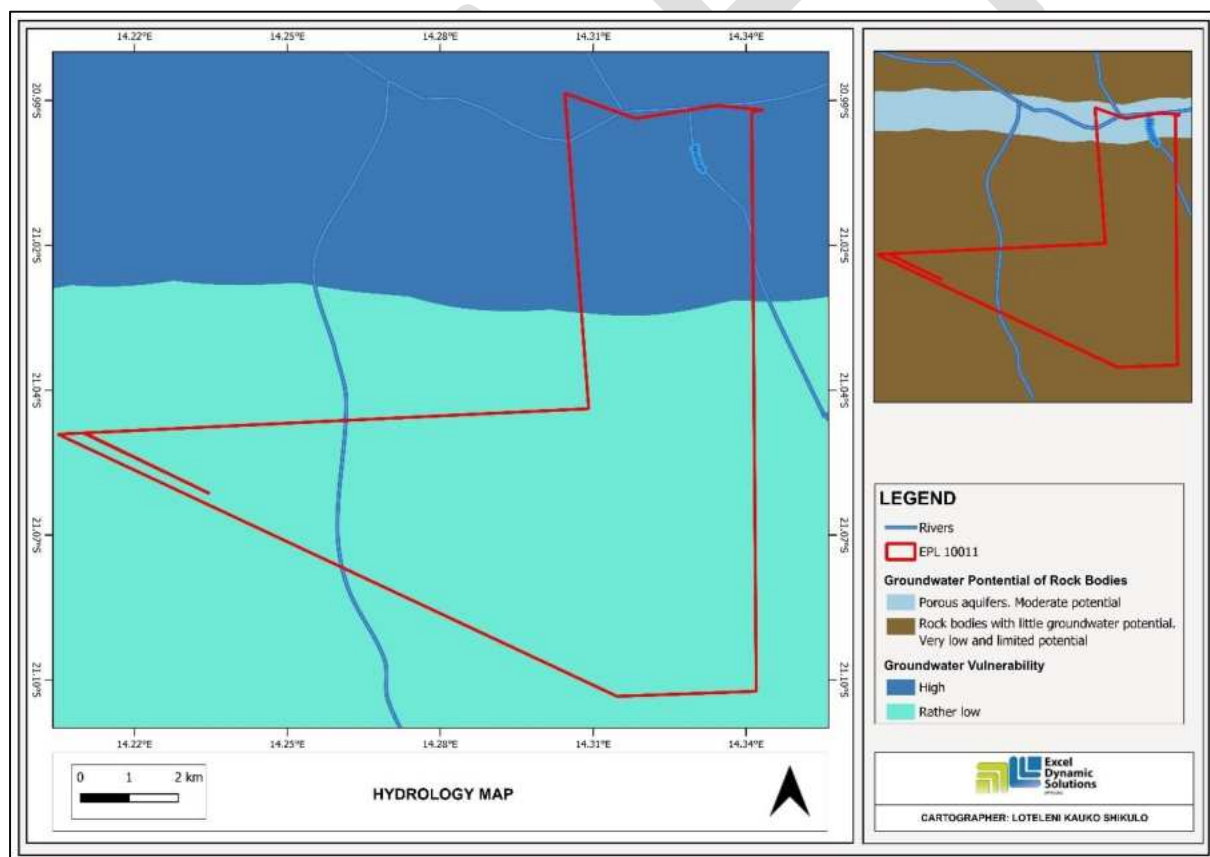


Figure 13: The Hydrological map of the area surrounding the EPL No. 10011

The EPL consists of three non-perennial rivers, namely the Ugab, Numas and the Naib rivers. These rivers flow in the southern direction of the EPL. Most southern parts of the EPL have a rather low underground water vulnerability, while the northern part (minority) of the EPL have

a high underground water vulnerability (see **figure 13**). In terms of groundwater potential of rock bodies, most parts of the EPL have rock bodies with little groundwater potential. There are, however, some minor parts within the EPL with Porous aquifers that have moderate potential. Groundwater extraction is the main source of water for the residents of the Uis settlement. However, no borehole was observed closer or in the EPL during the site visit.

5.5 Fauna and Flora

With regards to Fauna, the Tsiseb conservancy (that dominates the EPL) is home to the following wildlife: Elephants, the Black Rhino, Mountain Zebre Kudu, Oryx, Ostrich, Springbok, Leopard and Cheetahs. Besides that, domestic livestock such as Goats, Cattle, Donkeys and Sheep also exist in this conservancy.

Flora

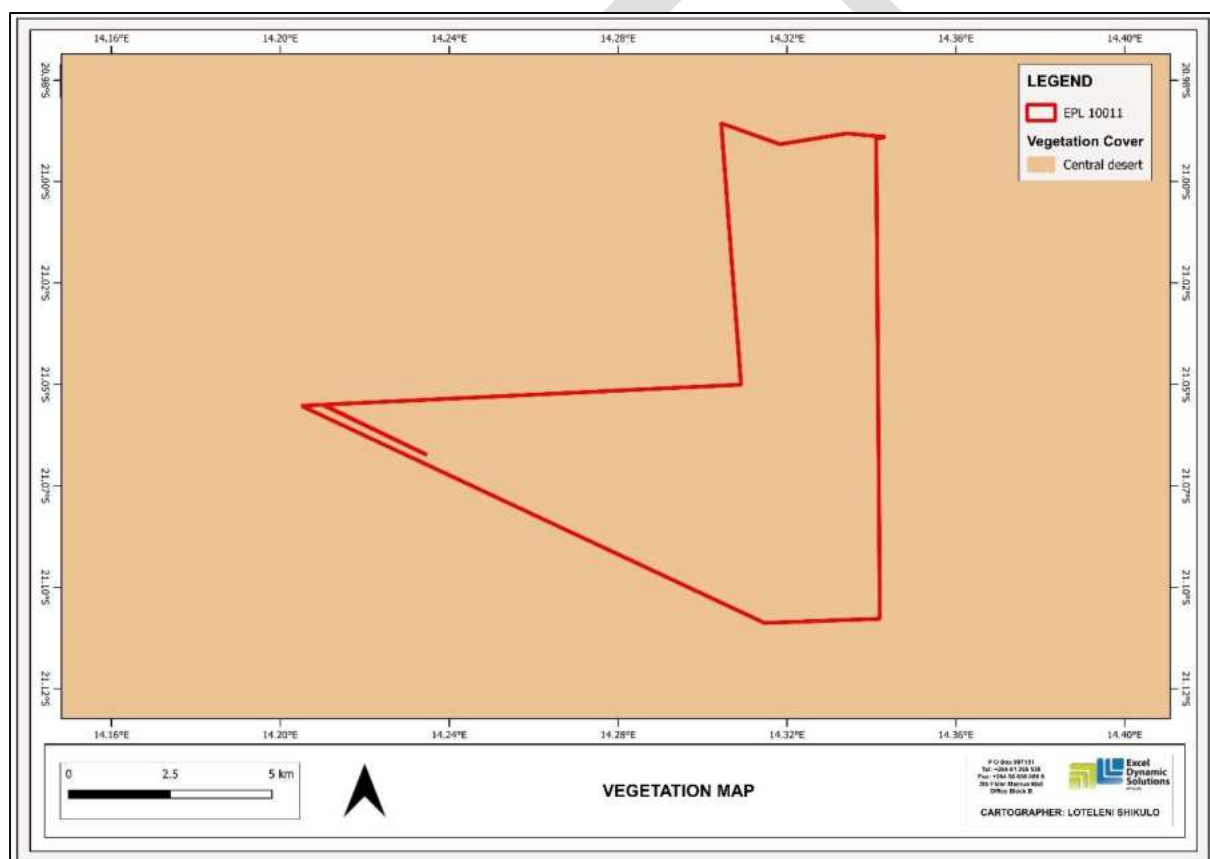


Figure 14: The type of vegetation cover surrounding the EPL No. 10011

The EPL is in the Nama Karoo Biome and is dominantly inhabited by sparse shrubs and grasses (Mendelsohn et al., 2022). In terms of the Floristic group, this EPL is in the Welwitschia Desert group (Mendelsohn et al., 2022). The prevalent vegetation cover in the EPL is the Central Desert (see **figure 14**). During the site visit, the *Welwitschia mirabilis*, a protected vegetation species in Namibia was observed closer to the EPL (see **figure 15**). The EPL is home to various other types of vegetation as indicated in **figure 15**.

Site vegetation

Figure 15: Vegetation seen on site

5.6 Heritage and Archaeology

The Brandberg Mountain, a prominent inselberg in the Namib Desert, is a site of exceptional paleo-archaeological importance, boasting one of the highest concentrations of prehistoric rock art in Africa (UNESCO, n.d.). The massif contains over 43,000 recorded rock paintings and engravings at nearly 1,000 sites, including the well-known "White Lady" (Kinahan, 2011). These significant artworks, created over millennia, offer invaluable insights into the complex spiritual beliefs, social structures, and daily lives of the San people, who inhabited the area for thousands of years.

Archaeological evidence suggests that the Brandberg served as a significant cultural and ritual center, potentially linked to seasonal migrations, resource management, and social gatherings (Lenssen-Erz, 2001). The Brandberg's ecological significance is also noteworthy. It lies in the transition zone between the Namib Desert and the Savannah, supporting a diverse array of plant and animal life, including endemic species. The fragile desert ecosystem is highly sensitive to disturbance, and the mountain's unique biodiversity is closely linked to its geological formations and microclimates. Given this rich archaeological heritage and fragile desert environment, any proposed activities within EPL No. 10011 must prioritize the preservation of these irreplaceable cultural resources and the ecological integrity of the area.

During the site visit, no graveyards were observed.

5.7 Socio – Economic condition of Uis

The Erongo Region covers an area of 63,586 km², which comprises 7.7% of Namibia's total area of about 823,680 km². The Erongo Region stretches from the Central Plateau westwards across the Central-Western Plains and Escarpment to the Central Namibian coast, roughly over a distance between 200 and 350 km. Northwards this region stretches from the Ugab River in the north to the Kuiseb River in the south over up to 300 km. On the west it is flanked by the Atlantic Ocean (Erongo Regional Council, 2021). Additionally, this region is home to 240 206 people (Namibia Statistics Agency, 2023). In depth demographic data about the Daures constituency that is home to EPL No.10011 are depicted in **figure 16** below.

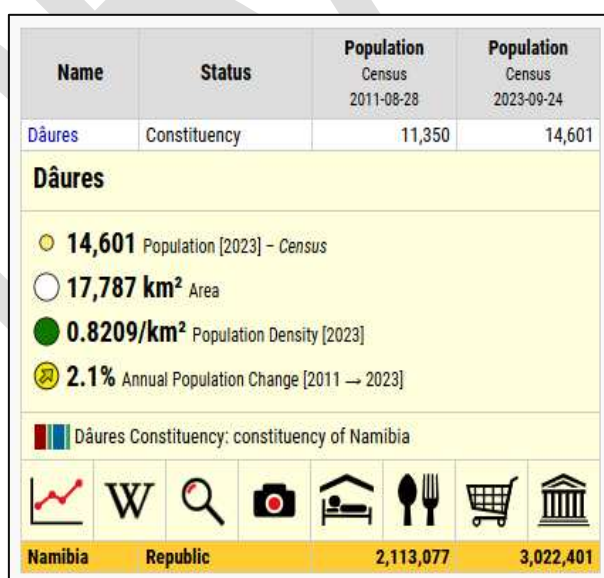


Figure 16: Some Socio - economic Statistics of the Daures Constituency (source: city population, 2025)

The economy of the Erongo Region 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) (Erongo Regional Council, 2025). According to the Namibian Statistics Agency (2024), the main sources of income in this region are salaries and wages (68.7%), old age pension (7.7%), farming (0.7%) and Business (non- farming) (7.5%). Moreover, according to Wirbelauer et al., (2007), the Tsiseb conservancy, contains a variety of mineral deposits that will serve as a significant source of income for the local population.

6 PUBLIC CONSULTATION PROCESS

Public consultation forms an important component of an Environmental Impact Assessment (EIA) process and provides potential I & APs with an opportunity to comment on and raise any issues relevant to the project for consideration as part of the assessment process. This consultation has been done in accordance with both the EMA and its EIA Regulations.

The public consultation process assists the EAP in identifying all potential impacts and to find out to what extent further investigations are needed. Furthermore, this consultation can also aid in the process of identifying possible mitigation measures.

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

Relevant applicable national, regional, local authorities, and other interested members of the public were contacted directly. Whereas some were registered as I & APs upon their request. Newspaper adverts of the proposed project were placed in two widely read national newspapers, namely, *The Namibian Newspaper* and the *New Era* newspapers on the 10th & 17th January 2025. The project advertisement / announcement ran for two consecutive weeks inviting members of the public to register as I & APs and submit their comments. The summary of pre-identified and registered I&APs is listed in **table 4** below.

Table 4: Summary of Interested and Affected Parties (I&Ps)

National (Ministries and State-Owned Enterprises)
Ministry of Agriculture, Fisheries, Water and Land Reform
Ministry of Environment, Forestry and Tourism (Department of Environmental Affairs and Forestry)
Regional & Local
Erongo Regional council - Daures Constituency Office
General Public
Interested and Affected members of the public: The representative of the Tsiseb Conservancy, Dâure Daman Traditional Authority (TA) as well as the residents of the Uis settlement.

6.2 Communication with I & APs

Regulation sections 21 to 24 of the EIA Regulations details steps to be taken during a public consultation process and these have been used in guiding this process. Communication with I & APs about the proposed development was facilitated through the following means and in this order:

- A BID containing brief information about the proposed facility was compiled and sent out to all pre-identified affected parties and upon request to all new registered Interested and Affected parties (I & APs).
- Project Environmental Assessment notices were published in The Namibian and New Era Newspapers on the 10th and the 17th January 2025, briefly explaining the activity and its locality, inviting members of the public to register as I&APs and to submit their comments/concerns/issues.
- Public notices were placed at the notice board at the Brandberg rest camp and at the Tsiseb conservancy office in Uis to inform the members of the public about the EIA process and register as I&APs as well as to submit comments/concerns/issues (see **figure 17a-b**).
- Two public consultation meetings were held on the 14th of March 2025. These meetings took place at 10h17 and at 12h06 at the Brandberg rest camp and the Tsiseb conservancy's office respectively (see **figure 18a-b**). During these meetings, the stakeholders raised their concerns, issues and comments regarding the proposed project.
-

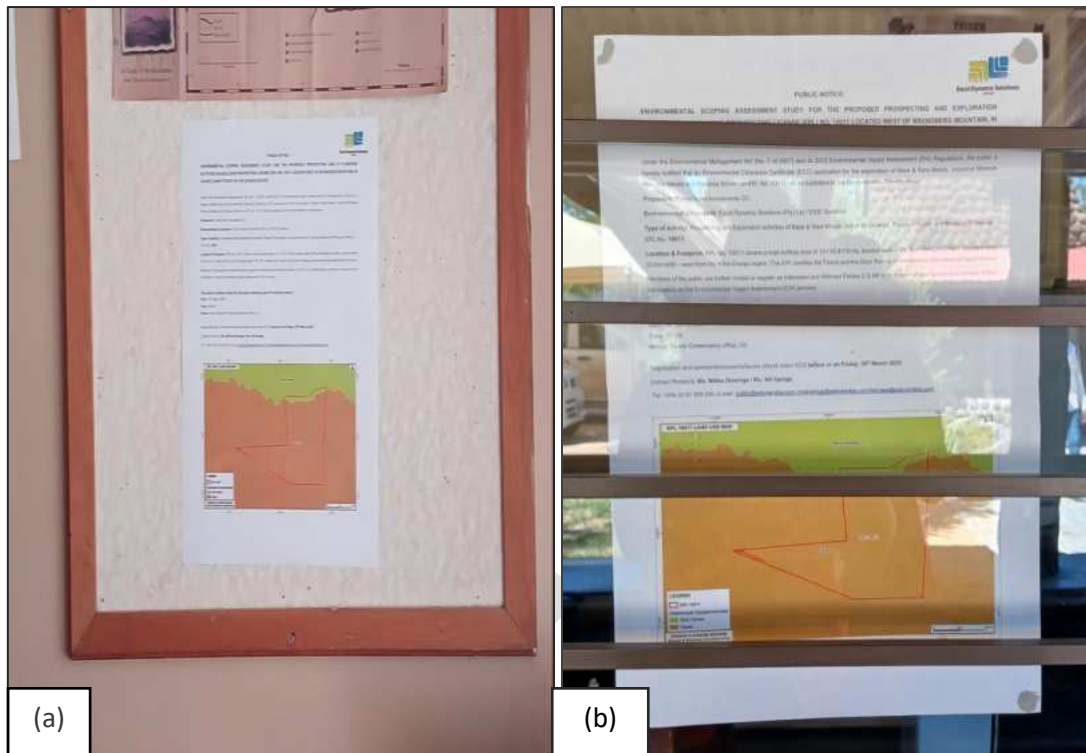


Figure 17: The notice placed at the notice board of Brandberg rest camp (a) and at Tsiseb conservancy office (b)



Figure 18: The consultation meetings at the Brandberg rest camp (a) and at the Tsiseb conservancy (b).

6.3 Public Feedback

Two public consultation meetings were held for EPL No.10011. The main I & Aps at the meeting that took place at the Brandberg rest camp were the representatives of Dâure Daman Traditional Authority. Whereas the representatives from the Tsiseb conservancy were the I and Aps at the meeting that took place at the Tsiseb conservancy office.

Most of the concerns, issues and questions alongside their responses from the EDS team are attached as part of the public consultation. The summarised concerns are depicted in **table 5** below.

Table 5: Summary of main issues raised, and comments received during public meeting engagements

Issue	Concern
Doro !Nawas conservancy	Exclusion of the Doro !Nawas conservancy from the EPL due to existing disputes regarding Tourism and Mining activities in the conservancy.

The Draft EIA report together with all its appendices will be circulated to all I&APs for review for a period not less than 7 days. Should there be any comments/concerns/issues, these will be documented in a *Comments and Response Trail Document* and incorporated into the Final Report that will then be submitted to the Department of Environmental Affairs and Forestry (DEAF) for evaluation and consideration of an ECC.

7 IMPACT IDENTIFICATION, ASSESSMENT AND MITIGATION MEASURES

7.1 Impact Identification

The proposed developments/activities are usually associated with different potential positive and/or negative impacts. However, for an environmental assessment, the focus is placed mainly on the negative impacts. This is done to ensure that these impacts are addressed by providing adequate mitigation measures such that an impact's significance is brought under control, while maximizing the positive impacts of the development. The potential positive and negative impacts that have been identified from the prospecting activities are listed as follow:

Positive impacts:

- Employment creation and skills transfer
- Investment opportunities/infrastructure-related development benefits
- Increase in local, regional and economic development
- Improved support for local businesses through the procurement of locally available goods and services.

Negative impacts:

- Disturbance of grazing land
- Impact on fauna and flora through habitat disturbance and possible poaching
- Generation of Dust (Air quality)
- Water resource use (over abstraction of water)
- Soil and underground water pollution
- Waste Generation
- Possible occupational community health and safety risks/hazards
- Minor noise and vibration pollution associated with drilling
- Disturbance of archaeological or cultural heritage
- Impacts associated with closure and decommissioning of exploration works

7.2 Impact Assessment Methodology

The Environmental Assessment process primarily ensures that potential impacts that may occur from the project activity are identified and addressed with environmentally cautious approaches and legal compliances. 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 6, Table 7, Table 8 and Table 9**, respectively.

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 were applied in this impact assessment:

7.2.1 Extent (spatial scale)

Extent is an indication of the physical and spatial scale of the impact. **Table 6** shows rating of impact in terms of spatial scale.

Table 6: Extent / Spatial Impact rating

Low (1)	Low/Medium (2)	Medium (3)	Medium/High (4)	High (5)
Impact is localized within the site boundary: Site only	Impact is beyond the site boundary: Local	Impacts felt within adjacent biophysical and social environments: Regional	Impact widespread far beyond site boundary: Regional	Impact extend National or over international boundaries

7.2.2 Duration

Duration refers to the timeframe over which the impact is expected to occur, measured in relation to the lifetime of the project. **Table 7** shows the rating of impact in terms of duration.

Table 7: Duration Impact rating

Low (1)	Low/Medium (2)	Medium (3)	Medium/High (4)	High (5)
Immediate mitigating measures, immediate progress	Impact is quickly reversible, short term impacts (0-5 years)	Reversible over time; medium term (5-15 years)	Impact is long-term	Long term; beyond closure; permanent; irreplaceable or irretrievable commitment of resources

7.2.3 Intensity, Magnitude / severity

Intensity refers to the degree or magnitude to which the impact alters the functioning of an element of the environment. The magnitude of alteration can either be positive or negative. These ratings were also taken into consideration during the assessment of severity. **Table 8** shows the rating of impact in terms of intensity, magnitude or severity.

Table 8: Intensity, magnitude or severity impact rating

Type of criteria	Negative				
	H- (10)	M/H- (8)	M- (6)	M/L- (4)	L- (2)
Qualitative	Very high deterioration, high quantity of deaths, injury of illness / total loss of habitat, total alteration of ecological processes, extinction of rare species	Substantial deterioration, death, illness or injury, loss of habitat / diversity or resource, severe alteration or disturbance of important processes	Moderate deterioration, discomfort, partial loss of habitat / biodiversity or resource, moderate alteration	Low deterioration, slight noticeable alteration in habitat and biodiversity. Little loss in species numbers	Minor deterioration, nuisance or irritation, minor change in species / habitat / diversity or resource, no or very little quality deterioration.

7.2.4 Probability of occurrence

Probability describes the likelihood of the impacts occurring. This determination is based on previous experience with similar projects and/or based on professional judgment. **Table 9** shows impact rating in terms of probability of occurrence.

Table 9: Probability of occurrence rating

Low (1)	Medium/Low (2)	Medium (3)	Medium/High (4)	High (5)
Improbable; low likelihood; seldom. No known risk or vulnerability to natural or induced hazards.	Likely to occur from time to time. Low risk or vulnerability to natural or induced hazards	Possible, distinct possibility, frequent. Low to medium risk or vulnerability to natural or induced hazards.	Probable if mitigating measures are not implemented. Medium risk of vulnerability to natural or induced hazards.	Definite (regardless of preventative measures), highly likely, continuous. High risk or vulnerability to natural or induced hazards.

7.2.5 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 section, for this assessment, the significance of the impact without prescribed mitigation actions is measured.

Once the above factors (**Table 6**, **Table 7**, **Table 8** and **Table 9**) have been ranked for each potential impact, the impact significance of each is assessed using the following formula:

$$\text{SIGNIFICANCE POINTS (SP)} = (\text{MAGNITUDE} + \text{DURATION} + \text{SCALE}) \times \text{PROBABILITY}$$

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 10**).

Significance rating scale

Table 10: Significance rating scale

Significance	Environmental Significance Points	Colour Code
High (positive)	>60	H
Medium (positive)	30 to 60	M

Significance	Environmental Significance Points	Colour Code
Low (positive)	1 to 30	L
Neutral	0	N
Low (negative)	-1 to -30	L
Medium (negative)	-30 to -60	M
High (negative)	-60<	H

Positive (+) – Beneficial impact

Negative (-) – Deleterious/ adverse+ Impact

Neutral – Impacts are neither beneficial nor adverse

For an impact with a significance rating of high (-ve), mitigation measures are recommended to reduce the impact to a medium (-/-ve) or low (-ve) 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 exploration phases is done for pre-mitigation and post-mitigation.

The risk/impact assessment is driven by three factors:

Source: The cause or source of the contamination.

Pathway: The route taken by the source to reach a given receptor

Receptor: A person, animal, plant, eco-system, property or a controlled water source. If contamination is to cause harm or impact, it must reach a receptor.

Pollutant linkage occurs when a source, pathway and receptor exist together. Mitigation measures aim firstly, avoid risk and if the risk cannot be avoided, mitigation measures to minimize the impact are recommended. Once mitigation measures have been applied, the identified risk would reduce to lower significance.

This assessment focuses on the three project phases namely, the prospecting, exploration (and possible analysis) and decommissioning phases. The potential negative impacts stemming from the proposed activities of the EPL are described, assessed and the mitigation

measures are provided thereof. Further mitigation measures in a form of management action plans are provided in the Draft Environmental Management Plan.

7.3 Assessment of Potential Negative Impacts

The main potential negative impacts associated with the operation and maintenance phase are identified and assessed below:

7.3.1 Disturbance to the grazing land

The EPL overlies the Tsiseb conservancy, there are livestock and wildlife in it. The movement of exploration vehicles and other exploration activity may lead to the disturbances of grazing land will negatively affect the availability of grazing. Limiting grazing might cause the extinction of various animals. Exploration activities such as site clearing, trenching, and drilling can lead to the disturbance of this grazing.

The effect of exploration work on the land (when done over a wider spatial extent), if not mitigated, may hinder grazing. Under the status quo, the impact can consider to be of a medium significance rating. With the implementation of appropriate mitigation measures, the rating will be reduced to a lower significance. The impact is assessed in **Table 11** below.

Table 11: Assessment of impacts of exploration on grazing land

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H: -4	M/H: -4	M/L: -4	H: 5	M: -60
Post mitigation	L/M: -2	L/M: -2	L: -2	M: 3	L: -18

7.3.2 Impact on Fauna and Flora through habitat disturbance and possible poaching

Fauna: The trenching, pitting and drilling activities carried out during exploration would result in habitat disturbance, leading to habitat loss for a diversity of fauna ranging from microorganisms to larger animals.

The movement of the exploration workforce and operation of project equipment as well as heavy vehicles within and around the EPL would disturb the lifestyle of wildlife and livestock present in the area. Additionally, the proposed activities might invite the risk of potential illegal hunting of wildlife. This illegal hunting may result in the depletion of fauna species in the area. Another crucial aspect is that if the exploration sites are not rehabilitated, they could pose a high risk of injuries to animals by falling into holes and pits. This may cause the loss of wildlife and livestock.

Flora: The prospecting activities will unavoidably result in some loss of vegetation. This will be due to the direct impact of clearing for exploration access routes and associated infrastructure. Moreover, the dust emissions from drilling may also negatively affect the surrounding vegetation through the fall of dust, if excessive. This could interfere with the plants' ability to carry out photosynthesis, thereby slowing their growth. However, given the abundance of the shrubs and site-specific areas of exploration on the EPL, the impact will be localized, therefore manageable.

Due to the presence of various types of wildlife and livestock, the impact can be of a **high** significance rating. However, with the implementation of appropriate mitigation measures, the rating will be reduced to a low significance rating. The impact is assessed in **table 12** below.

Table 12: Assessment of impacts of exploration on biodiversity

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: -6	M/H: -4	M/H: -8	M/H: 4	M: -72
Post mitigation	L/M: -2	L/M: -2	L: -2	M: 3	L: -18

7.3.3 Generation of Dust (Air Quality)

Dust emanating from site access routes when transporting exploration equipment and supplies to and from site may compromise the air quality in the in and around the area. Besides that, heavy vehicular movements would potentially create dust, even it is not anticipated to be high. Additionally, activities carried out as part of the exploration works such as drilling would contribute to the dust levels in the air. Given the current situation, the generation of dust impact is rated as medium significance. Nevertheless, this impact will be reduced to a low significance rating by properly implementing mitigation measures. The impact is assessed in **table 13** below.

Table 13: Assessment of Impacts of exploration on air quality

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: -3	M: -3	M/L: -4	M/H: 4	M: -40
Post mitigation	L/M: - 2	L/M: - 2	L:- 2	L: - 1	L:- 6

7.3.4 Water Resources Use (over – abstraction of water)

Prospecting activities affect the water resources through over – abstraction of water on some occasions. Abstraction of more water than can be replenished from dominating little and minor moderate groundwater potential areas would negatively affect the local communities' members and the animals that depend on the same groundwater resources, especially in this arid area.

The impact of the project activities on this resource would be dependent on the water volumes required by each activity of the project. Exploration activities use a lot of water, mainly for drilling. However, this depends on the type of drilling methods employed and the type of mineral being explored for. Moreover, the exact amounts of water required for proposed operations would be dependent on the duration of the exploration works and number of exploration boreholes required to make reliable interpretation on the commodities explored for. The exploration period is temporally limited, therefore, the impact will only last for the duration of the exploration activities and ceases upon completion.

Without the implementation of any mitigation measures and due to the aridity of the area, the impact can be rated as **high**, but upon effective implementation of the recommended measures, the impact significance would be reduced to low significance rating as presented in **table 14** below.

Table 14: Assessment of impacts of exploration on water resources

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H: - 8	M/H: - 4	M: - 6	M/H: - 4	H: - 72
Post mitigation	L/M: - 2	L/M :- 2	L: - 2	M:- 3	L: - 18

7.3.5 Soil and underground water Pollution

The proposed exploration activities are associated with a variety of potential pollution sources (i.e., lubricants, fuel, and wastewater) that may contaminate/pollute soils, and eventually, surface and groundwater. The anticipated potential source of pollution to underground 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.

A critical factor to note is that some parts of the EPL fall within an area with high groundwater vulnerability. Therefore, exploration activities may pollute the available water resources (boreholes) through the intrusion of saltwater into the possibly existing freshwater boreholes.

The spills (depending on volumes spilled on the soils) from machinery, vehicles and equipment could infiltrate into the ground then pollute the fractured or faulted aquifers on site, and with time reach further groundwater systems in the area. Oil spillage may hence also interfere with the ecosystem. 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.

Pre-implementation of any mitigation measures, the impact is rated as having medium significance. However, upon implementation, the significance will be reduced to low significance. The impact is assessed in **table 15** below.

Table 15: Assessment of impacts of exploration on soils and water (pollution)

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: - 3	M: - 3	M: - 6	M: - 3	M: - 36
Post mitigation	L: - 1	L: - 1	L: - 2	L/M: - 2	L: - 8

7.3.6 Waste Generation

During the prospecting and exploration phase, domestic and general waste will be produced on site. If the generated waste is not disposed of in a responsible way, land pollution may occur on and around the EPL. Improper handling, storage and disposal of hydrocarbon products and hazardous materials at the site may lead to soil and groundwater contamination, through spills and leakages. Therefore, the exploration programme needs appropriate waste management on site. To prevent land and underground pollution, any hazardous waste that may have an impact on the animals, vegetation, water resources and the general environment should be handled cautiously. Without any mitigation measures, the general impact of waste generation has a medium significance. However, after the implementation of the mitigation measures, this impact will be reduced to low significance. An assessment of this impact is given in **table 16** below.

Table 16: Assessment of impacts of exploration on waste generation

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: - 3	M: - 3	M: - 6	M: - 3	M: - 36

Post mitigation	L: - 1	L: - 1	L: - 2	L/M: - 2	L: - 8
------------------------	--------	--------	--------	----------	--------

7.3.7 Occupational Health and Safety Risks

Project personnel (workers) involved in the exploration activities may be exposed to health and safety risks. These may result from accidental injury, owing to either minor (i.e., superficial physical injury) or major (i.e., involving heavy machinery or vehicles) accidents. The site safety of all personnel is the Proponent's responsibility and should be adhered to as per the requirements of the Labour Act (No. 11 of 2007) and the Public Health Act (No. 36 of 1919). The heavy vehicle, equipment and fuel storage area should be properly secured to prevent any harm or injury to the project workers or to animals.

The use of heavy equipment, especially during drilling and the presence of hydrocarbons on sites may result in accidental fire outbreaks, which could pose a safety risk to the project workers, equipment and vehicles. It may also lead to widespread fires if an outbreak is not contained and if machinery and equipment are not properly stored, the safety risk may be a concern for project workers and residents.

The impact is probable and has a medium significance rating. However, with adequate mitigation measures, the impact rating will be reduced to low. This impact is assessed in **Table 17** below.

Table 17: Assessment of impacts of exploration on health & safety

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: - 3	M/H: - 4	M/H: - 8	M/H: - 4	M: - 60
Post mitigation	L/M: - 2	L/M: - 2	M/L: - 4	L/M: - 2	L: - 16

7.3.8 Noise and vibrations pollution associated with drilling

Prospecting and exploration work may be a nuisance to surrounding communities due to the noise produced by the activities (especially drilling). Excess noise and vibrations can be a health risk to workers on site. Another important factor to note is that the exploration equipment used for drilling on site is medium in size. The noise level is bound to be limited to the site only, therefore, the impact likelihood is minimal. Without any mitigation, the impact is rated as of medium significance. To change the impact significance from the pre-mitigation significance

to low rating, mitigation measures should be implemented. This impact is assessed in **table 18** below.

Table 18: Assessment of the impacts of noise and vibrations

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: - 3	M: - 3	M/H: - 8	M:- 3	M: - 42
Post mitigation	L: - 1	L: - 1	L: - 2	L/M: -2	L: - 8

7.3.9 Disturbance to Archaeological and Heritage resources

There is a possibility of unveiling/discovering new archeological and/or cultural materials in the proposed project area. If such materials are found, the areas must be mapped, and coordinates taken to establish “No-Go-Areas”, due to their sensitivity; and must be documented. The discovered archeological and /or cultural material may be protected either by fencing them off or demarcation for preservation purposes, or by excluding them from any development i.e., no exploration activities should be conducted near these recorded areas through establishment of buffer zones.

This impact can be rated as medium significance if there are no mitigation measures in place. Upon implementation of the necessary measures, the impact significance will be reduced to a lower rating. The impact is assessed in **table 19**.

Table 19: Assessment of impacts of exploration on archaeology & heritage resources

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H: -4	M:- 3	M: - 6	M/H: - 4	M: - 52
Post mitigation	L/M: - 2	L: - 1	L: - 2	L/M: - 2	L: - 10

7.3.10 Impacts associated with closure and decommissioning of exploration works

After the closure of the mine, the pit (if any) will need to be properly fenced off to prevent injuries of wildlife and people. Additionally, the site will need to be evacuated to allow the restoration of the environment. If not evacuated after the closure of the mine, then there will be a high possibility of environmental damage. Without the implementation of the mitigation measures, this impact is rated as of medium significance. After the implementation of the mitigation measures, this significance rating can be reduced to a low rating. The impact is assessed and presented in **table 20** below.

Table 20: Assessment of closure and decommissioning of the exploration works

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: - 3	M/H: - 4	M/H: - 8	M/H: - 4	M: - 60
Post mitigation	L:- 1	L/M: - 1	M/L: -4	L/M: -1	L: - 6

8 RECOMMENDATIONS AND CONCLUSION

8.1 Recommendations

The potential positive and negative impacts of the proposed exploration activities on EPL No. 10011 were identified. The negative impacts were assessed and appropriate management and mitigation measures were provided for implementation by the Proponent, their contractors and project related employees.

Mitigation measures to the identified impacts have been provided in the EMP, in order for the Proponent to avoid and/or minimize their significance of impacts on the environmental and social components. All of the potential negative impacts were found to be of medium rating significance without the implementation of the mitigation measures. However, with effective implementation of the recommended management and mitigation measures, the ratings in the general significance of negative impacts are expected to change from **high / medium to low significant rating**. To maintain the desirable rating, the implementation of management and mitigation measures should be monitored by the Proponent directly, or by their Environmental Control Officer (ECO). Equally important, the monitoring of implementation will not only be done to maintain low rating, but also to ensure that all potential impacts identified in this study, and other impacts that might arise during implementation are properly identified in time and addressed immediately.

The Environmental Consultant is confident that the potential negative impacts associated with the proposed project activities can be managed and mitigated by effective implementation of the recommended management and mitigation measures, as well as with more effort and commitment put towards monitoring the implementation of these measures.

It is, therefore, recommended that in the case of ECC issuance for this project, the proposed prospecting and exploration activities may be granted an ECC, provided that:

- All the management and mitigation measures provided in the EMP are effectively and progressively implemented.

- All required permits, licenses and approvals for the proposed activities should be obtained as required.
- The Proponent and all project workers and contractors must comply with the legal requirements governing the project and ensure that all required permits and or approvals 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.

8.2 Conclusion

It is crucial for the Proponent, **Pointe Noire Investments CC**, and their contractors to effectively implement the recommended management and mitigation measures, to protect the biophysical and social environment throughout the project duration. This would be done with the aim of promoting environmental sustainability, while ensuring a smooth harmonious existence, and purpose of the project activities in the community and environment at large. It is also to ensure that all potential impacts identified in this study and other impacts that might arise during implementation are properly identified in time and addressed accordingly. Lastly, should the ECC be issued, the Proponent will be expected to be compliant with the ECC conditions as well as legal requirements governing mineral exploration and related activities.

9 REFERENCES

- Erongo Regional Council. (2025). Available from <http://www.erc.com.na/erongo-region/demographics/>.
- https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/uis_namibia_3352523
- https://www.nacso.org.na/sites/default/files/tsiseb_fact_sheet.pdf
- Kinahan, J. (2011). *The archaeology of the Brandberg, Namibia*. Africa Magna Verlag.
- Lenssen-Erz, T. (2001). *Stories of the Rocks: San Rock Art and Landscape in the Brandberg Mountain*. Africa Magna Verlag.
- Mendelsohn, J., Jarvis, A., Mendelsohn, M., & Robertson, T. (2022). *Atlas of Namibia: its land, water and life*. Namibia: Namibia Nature Foundation.
https://www.researchgate.net/publication/362712269_Atlas_of_Namibia-Its_land_water_and_life
- Mendelsohn, J., Jarvis, A., Roberts, C., & Robertson, T. (2002). *Atlas of Namibia*. David Philip Publishers.
- Namibia Statistics Agency (2024). 2023 Population & Housing Census Preliminary Report. Available at: <https://nsa.nsa.org.na/wp-content/uploads/2024/03/Preliminary-Report-doc-fn.pdf>
- Nyambe J.M., & Amunkete, T. (2009). Small-Scale Mining and Its Impact on Poverty in Namibia: A Case Study of Miners in the Erongo Region. Namibian Economic Policy Research Unit, Windhoek.
- UNESCO. (n.d.). *Brandberg National Monument Area*. Retrieved from <https://whc.unesco.org/en/tentativelists/1744/>
- World Weather Online. (2025). <https://www.worldweatheronline.com/uis-weather-history/erongo/na.aspx>
- Wirbelaeur, C., Mosimane, A., Mabunda, R., Makota, C., Khumalo, A., & Nanchengwa, M. (2007). A Preliminary Assessment of the Natural Resources Management Capacity of Community-Based Organizations in Southern Africa: Cases from Botswana, Mozambique, Namibia, Zambia and Zimbabwe. Botswana: IUCN Botswana.