APP-006161

EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) AREA 10042 IN THE OMAHEKE AND KHOMAS REGIONS

ENVIRONMENTAL ASSESSMENT SCOPING REPORT

Assessed by:

Assessed for:

June 2025

Project:	**EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) AREA 10042 IN THE OMAHEKE AND KHOMAS REGIONS: ENVIRONMENTAL ASSESSMENT SCOPING REPORT**	
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Report Approval:	 André Faul	

I, Y. Hess, hereby approve this report and confirm that the project description contained in herein is a true reflection of the information which the Proponent has provided to Geo Pollution Technologies. All material information in the possession of the Proponent that reasonably has or may have the potential of influencing any decision or the objectivity of this assessment is fairly represented in this report.

Signed at Windhoek on the 17th day of September 2025.

Votorantim Metals Namibia (Pty) Ltd

2013/0251
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EXECUTIVE SUMMARY

Introduction

Votorantim Metals Namibia (Pty) Ltd (VMN or the Proponent) is a prospecting company registered in Namibia. Through the Ministry of Industries, Mines and Energy (MIME), VMN has exclusive prospecting licenses (EPLs) across Namibia, focusing specifically on prospecting for base, rare and precious metals.

The Proponent received an "Intention to Grant" from the MIME for their application for exclusive prospecting licence (EPL) 10042 which is mainly located in the Okarukambe Constituency of the Omaheke Region, with only a small portion in the Windhoek Rural Constituency of the Khomas Region. The EPL is located over privately owned commercial farms and the Omitara Settlement. The EPL will be granted to the Proponent upon successful acquisition of an environmental clearance certificate (ECC) for the EPL area. Geo Pollution Technologies (Pty) Ltd (GPT) was appointed by the Proponent, as independent environmental consultant, to assist with the necessary studies to determine the potential environmental impacts, and ultimately whether an ECC may be granted for this EPL. To achieve this, an environmental scoping assessment was undertaken to determine the potential positive and negative impacts of the Proponent's proposed exploration activities on the environment.

Scope and Methodology

The environmental assessment is conducted to determine all environmental, safety, health and socio-economic impacts associated with proposed exploration activities. Relevant environmental data was compiled by using secondary data and during a reconnaissance site visit. Potential environmental impacts and associated social impacts were identified and are addressed in this report.

Project Description

Activities conducted for the exploration of mineral resources consist of both remote and field assessments. Remote work include studying existing literature that provides information on geological and mineral data for the area of interest. A large part of remote work also involves studying and analysing satellite and aerial photography images. Technological advancements in these imagery methods have made it possible to gather a vast amount of data on both the surface and subsurface geology. Based on the remote work, an area of interest may be defined for field work. Field work will entail visiting the area and making observations regarding the surface geology. Soil and rock samples can also be collected for analysis. Various scientific techniques for surveying the subsurface may also be employed. This does not entail digging large holes or trenching, but may require some vegetation clearing where dense vegetation stands restricts access. Due to the dense vegetation in this EPL, aerial surveys with a helicopter, drone or airplane is sometimes conducted. Only when sufficient information is gathered with the above methods to identify potential mineable areas, will exploration drilling be undertaken. Such drilling allows for the collection of subsurface material for analysis, at varying depths. Any areas impacted by drilling will be rehabilitated to allow for rapid vegetation reestablishment and erosion prevention. After all exploration activities are complete, and all data has been analysed and processed, it is determined whether there are any minable resources within the EPL. Should there be minable resources, a mining licence application must be lodged, which will require its own, more focused, environmental assessment.

Public Participation

As part of the environmental assessment process, public consultation was performed. This entailed placing site notices at different locations within and around the EPL area, placing advertisements in two national newspapers, and notifying land owners, identified interested and affected parties, and relevant authorities via email and/or hand delivered letter. All comments and concerns are addressed in the comments and responses table of this report.

Impacts

Positive impacts arising from the exploration project include employment, training and development of the Namibian workforce; increased economic resilience of employees and contractors; economic injection into the Namibian economy through the sourcing of goods and services, often with funds

obtained from foreign investors; generation of new knowledge on, amongst others, the local geology and ecology of the exploration area; and potential discoveries of feasible minable mineral resources.

Negative impacts of exploration entails limited ecological disturbances where vegetation needs clearing for exploration. Pollution of the environment can occur when there are hydrocarbon leaks from drilling equipment and vehicles, or where waste is not contained and removed from site. Fire, dust, erosion, noise and deterioration of roads are also impacts associated with exploration.

Management of Impacts

Positive impacts can be enhanced by supporting local industries and contractors and appointment of local Namibian employees, as far as is practically possible. It should however be noted that the technologies are sometimes highly specialised and new to Namibia and will then require international expertise.

Negative impacts related to exploration will be limited by adherence to environmental management procedures and accepted industry standards. Exploration teams and their vehicles must be clearly distinguishable through uniforms, identification tags and vehicle branding. The footprint of vegetation clearing must be limited to only the necessary areas and the removal of protected species must be avoided as far as possible. Vehicles should at all times adhere to the speed limits imposed by the Proponent in order to prevent dust, noise and road damage. All waste must be contained and removed from site; all machinery must be inspected and maintained to prevent leaks. Spill control measures must be in place in order to contain spills and prevent it from entering soil or groundwater. Firefighting equipment and training are pertinent to prevent and respond to fires.

The Proponent must reach a surface access agreement with all land owners prior to accessing the EPL. This includes being notified in advance of when exploration teams will be on site. All activities should be restricted to day time. Any deviation from this should be communicated to land owners and/or inhabitants without delay. Exploration teams must remain within agreed areas and should report any suspicious activities or incidents to the land owner.

The environmental management plan included in section 9.1 of this document should be used as an on-site reference document for planning, exploration and decommissioning activities. All monitoring and records kept should be included in a report to ensure compliance with the environmental management plan and environmental clearance certificate conditions. A health, safety, environment and quality policy, or similar, could be used in conjunction with the environmental management plan. Operators and responsible personnel must be taught the contents of these documents. National regulations and guidelines must be adhered to and monitored regularly as outlined in the environmental management plan.

Conclusion

Based on the environmental assessment, there is no reason why exploration cannot continue within the EPL. The environmental management plan as presented in this document should be adopted and the contents kept up-to-date as legislation, equipment and operational methods and conditions change.

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LIST OF ABBREVIATIONS

AIDS	Acquired Immune Deficiency Syndrome
BID	Background Information Document
CHIRPS	Climate Hazards Group Infra-Red Precipitation with Station data version
CITES	Convention on International Trade of Endangered Species
DEA	Department of Environmental Affairs
DWA	Department of Water Affairs
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act, 2007 (Act no. 7 of 2007)
EMP	Environmental Management Plan
EMS	Environmental Management System
EPL	Exclusive Prospecting Licence
GDP	Gross Domestic Product
GPT	Geo Pollution Technologies (Pty) Ltd
HIV	Human Immunodeficiency Virus
HSE	Health, Safety and Environment
IAP	Interested and Affected Party
IUCN	International Union for Conservation of Nature
KWH	Kilowatt Hour
m/s	Meter per second
mamsl	Meters above mean seal level
MARC	Minerals Ancillary Rights Commission
MAWLR	Ministry of Agriculture, Water and Land Reform
mbs	Meters below surface
MEFT	Ministry of Environment, Forestry and Tourism
MERRA-2	Modern-Era Retrospective analysis for Research and Applications version 2
mm/a	Millimetres per annum
MIME	Ministry of Industries, Mines and Energy
MSDS	Material Safety Data Sheet
NASA	National Aeronautics and Space Administration
NDP	National Development Plan
NNF	Namibia Nature Foundation
PPE	Personal Protective Equipment
QDS	Quarter Degree Square
SANS	South African National Standards
UNCCD	United Nations Convention to Combat Desertification
UNFCCC	United Nations Framework Convention on Climate Change
uPVC	Unplasticized polyvinyl chloride
VMN	Votorantim Metals Namibia
WHO	World Health Organization

GLOSSARY OF TERMS

Alternatives - A possible course of action, in place of another, that would meet the same purpose and need but which would avoid or minimize negative impacts or enhance project benefits. These can include alternative locations/sites, routes, layouts, processes, designs, schedules and/or inputs. The "no-go" alternative constitutes the 'without project' option and provides a benchmark against which to evaluate changes; development should result in net benefit to society and should avoid undesirable negative impacts.

Assessment - The process of collecting, organising, analysing, interpreting and communicating information relevant to decision making.

Biodiversity - The variability among living organisms from all sources including, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part.

Competent Authority - Means a body or person empowered under the local authorities act or Environmental Management Act to enforce the rule of law.

Cumulative Impacts - In relation to an activity, means the impact of an activity that in itself 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.

Mineral Exploration – The process of searching for concentrated deposits of minerals for the ultimate purpose of mining for economic benefit.

Environment - As defined in the Environmental Assessment Policy and Environmental Management Act - "land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in sub-paragraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, palaeontological or social values".

Environmental Assessment (EA) – Namibian terminology for a process of assessing the effects on the environment through either a scoping assessment or a combination of a scoping- and detailed assessment.

Environmental Management Plan (EMP) - A working document on environmental and socio-economic mitigation measures, which must be implemented by several responsible parties during all the phases of the proposed project.

Environmental Management System (EMS) - An Environment Management System, or EMS, is a comprehensive approach to managing environmental issues, integrating environment-oriented thinking into every aspect of business management. An EMS ensures environmental considerations are a priority, along with other concerns such as costs, product quality, investments, PR productivity and strategic planning. An EMS generally makes a positive impact on a company's bottom line. It increases efficiency and focuses on customer needs and marketplace conditions, improving both the company's financial and environmental performance. By using an EMS to convert environmental problems into commercial opportunities, companies usually become more competitive.

Evaluation – Means the process of ascertaining the relative importance or significance of information, the light of people's values, preference and judgements in order to make a decision.

Hazard - Anything that has the potential to cause damage to life, property and/or the environment. The hazard of a particular material or installation is constant; that is, it would present the same hazard wherever it was present.

Hyperspectral Imaging - A technique that captures and processes a wide spectrum of light beyond the visible range (which includes the colours humans can see). Unlike traditional imaging, which only captures three bands of colour (red, green, and blue), hyperspectral imaging divides the light spectrum into many more narrow bands, sometimes hundreds or even thousands, across wavelengths that include the ultraviolet, visible, and infrared regions.

Interested and Affected Party (IAP) - Any person, group of persons or organisation interested in, or affected by an activity; and any organ of state that may have jurisdiction over any aspect of the

activity.

Land Owner – The rightful holder of the title deed of a portion of privately owned land, or in the case of communal land, the legal occupier of land and/or the Government of the Republic of Namibia.

Mineral - A natural substance with unique and distinctive physical and chemical properties. In terms of mining, "economic minerals" include metals and hydrocarbons.

Mitigate - The implementation of practical measures to reduce adverse impacts.

Proponent (Applicant) - Any person who has submitted or intends to submit an application for an authorisation, as legislated by the Environmental Management Act No. 7 of 2007, to undertake an activity or activities identified as a listed activity or listed activities; or in any other notice published by the Minister or Ministry of Environment Forestry and Tourism.

Public - Citizens who have diverse cultural, educational, political and socio-economic characteristics. The public is not a homogeneous and unified group of people with a set of agreed common interests and aims. There is no single public. There are a number of publics, some of whom may emerge at any time during the process depending on their particular concerns and the issues involved.

Scoping Process - Process of identifying: issues that will be relevant for consideration of the application; the potential environmental impacts of the proposed activity; and alternatives to the proposed activity that are feasible and reasonable.

Significant Effect/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.

Stakeholder Engagement - The process of engagement between stakeholders (the proponent, authorities and IAPs) during the planning, assessment, implementation and/or management of proposals or activities. The level of stakeholder engagement varies depending on the nature of the proposal or activity as well as the level of commitment by stakeholders to the process. Stakeholder engagement can therefore be described by a spectrum or continuum of increasing levels of engagement in the decision-making process. The term is considered to be more appropriate than the term "public participation".

Stakeholders - A sub-group of the public whose interests may be positively or negatively affected by a proposal or activity and/or who are concerned with a proposal or activity and its consequences. The term therefore includes the proponent, authorities (both the lead authority and other authorities) and all interested and affected parties (IAPs). The principle that environmental consultants and stakeholder engagement practitioners should be independent and unbiased excludes these groups from being considered stakeholders.

Sustainable Development - "Development that meets the needs of the current generation without compromising the ability of future generations to meet their own needs and aspirations" – the definition of the World Commission on Environment and Development (1987). "Improving the quality of human life while living within the carrying capacity of supporting ecosystems" – the definition given in a publication called "Caring for the Earth: A Strategy for Sustainable Living" by the International Union for Conservation of Nature (IUCN), the United Nations Environment Programme and the World Wide Fund for Nature (1991).

1 INTRODUCTION

Votorantim Metals Namibia (Pty) Ltd (VMN or the Proponent) is a prospecting company registered in Namibia. Through the Ministry of Industries, Mines and Energy (MIME), VMN has exclusive prospecting licenses (EPLs) across Namibia, with a focus on base, rare and precious metals.

The Proponent, received an "Intention to Grant" from the MIME in respect of their application for EPL 10042 in the Okarukambe Constituency of the Omaheke Region and the Windhoek Rural Constituency of the Khomas Region. The EPL will be granted to the Proponent upon successful acquisition of an environmental clearance certificate (ECC) for the EPL area, as indicated in Figure 1-1. The EPL is for base and rare metals, industrial minerals and precious metals. The EPL overlaps privately owned commercial farms.

An ECC for the proposed exploration activities in the EPL area is required as per the Environmental Management Act, Act No. 7, of 2007 (EMA). The Proponent appointed Geo Pollution Technologies (Pty) Ltd (GPT), as independent environmental consultant, to assist with the necessary studies to determine the potential environmental impacts, and ultimately whether an ECC may be granted for this EPL. To achieve this, an environmental impact assessment (EIA) was undertaken to determine the potential positive and negative impacts of the Proponent's proposed exploration activities, on the environment. The results of this assessment are documented in this report, and it is accompanied by an environmental management plan (EMP) aimed at preventing or mitigating negative environmental impacts, while simultaneously promoting positive spinoffs from the project.

In terms of this study, the environment is defined as per the EMA's definition, as follows:

"land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in sub-paragraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, paleontological or social values"

Project Justification – Namibia is rich in mineral resources, with large parts of the country remaining relatively unexplored. The Minerals (Prospecting and Mining) Act of 1992 declares that all natural resources, including minerals, are owned by the government. It further states that no reconnaissance operations, prospecting operations or mining operations may be carried out without a licence as issued under the Act. Therefore, the responsibility to find, and ultimately extract, mineral resources, lies with authorised licence holders who must adhere to all regulations governing prospecting and mining.

The mining sector is one of the main contributors to employment and Namibia's gross domestic product (GDP). While exploration activities do so to a lesser degree, mining cannot commence until exploration activities indicate feasible resources. Benefits of exploration therefore include:

- Employment, training and development of the Namibian workforce.
- Increased economic resilience of employees and contractors.
- Economic injection into the Namibian economy through the sourcing of goods and services, often with funds obtained from foreign investors.
- Generation of new knowledge on, amongst others, the local geology and ecology of the exploration area.
- Potential discoveries of feasible minable mineral resources.

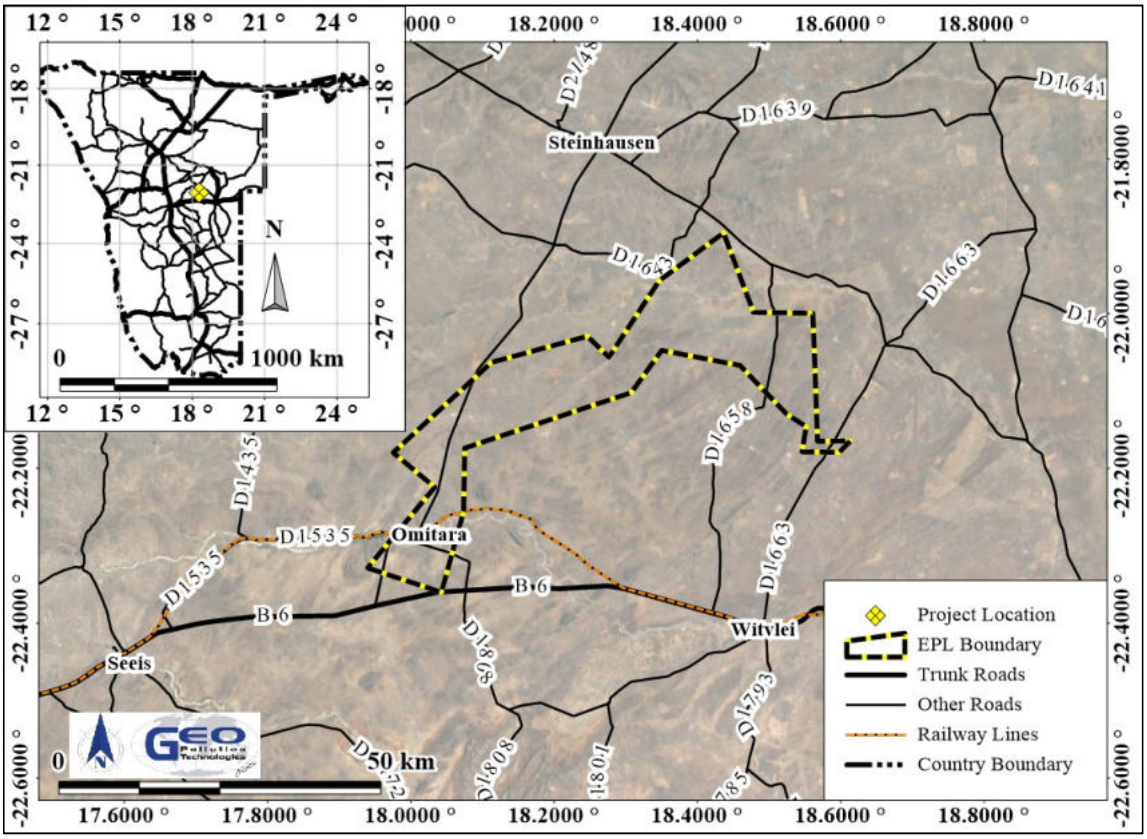

Figure 1-1 Project location

2 SCOPE

The scope of the environmental assessment is to, in compliance with Namibia's Environmental Management Act (2007):

- Provide a description of the proposed exploration activities.
- Provide an overview of the local environment within the exploration area.
- Determine the potential environmental impacts that may potentially emanate from exploration activities.
- Identify a range of management actions which could prevent or mitigate the potential adverse impacts to acceptable levels.
- Provide sufficient information to the Ministry of Environment, Forestry and Tourism (MEFT) and related authorities to make an informed decision regarding the exploration activities and the granting of an ECC and EPL.

3 METHODOLOGY

The following methods were used to investigate the potential impacts on the social and natural environment due to the proposed exploration activities:

- Baseline information about the site and its surroundings was obtained from existing secondary information as well as from primary information obtained during a reconnaissance site visit.
- As part of the scoping process to determine potential environmental impacts, interested and affected parties (IAPs) were consulted about their views, comments and opinions and these are put forward in this report.
- Based on gathered information and public and stakeholder consultation, an assessment of potential impacts was conducted and a management plan prepared.

4 PROJECT DESCRIPTION

Mineral exploration typically does not require any construction activities within the EPL. Project activities performed for purposes of exploring for the relevant commodities (base and rare metals, industrial minerals, and precious metals) include both off- and on-site activities. These are literature reviews, remote sensing, field surveys, geophysical surveys, geochemical sampling and exploratory drilling.

4.1 LITERATURE REVIEWS

Literature reviews, or desktop studies, are usually already started prior to applying for an EPL. Existing literature and scientific data are researched in order to determine whether a specific area is known to have minerals, or is likely to have minerals. Should the prospects be positive, an application for an EPL over the identified area is lodged. Literature reviews will continue once the EPL is granted, should additional literature and documentation become available.

4.2 REMOTE SENSING

Technological advancements in satellite imagery have revolutionised exploration activities and can provide a vast amount of information. It requires specialist manipulation and interpretation to determine the potential presence of minerals in a specific area. The simplest form is using standard satellite imagery and aerial photography to develop detailed geological maps, without having to be in the field. This way, surface structures prone to hosting mineral resources can be identified.

More complex methods of remote sensing also exist. For example, hyperspectral imaging can provide more detailed information by identifying specific minerals based on the spectral signatures they produce. A hyperspectral camera captures light from the earth's surface and separates it into its different wavelengths. Each pixel in the resulting image represents a specific spectrum of light, which is used to identify materials based on known spectral signatures.

Drone and aerial technology has also improved significantly over the last decade, and when equipped with geophysical survey equipment, provides detailed information in the subsurface structures such as geological structures, mineral deposits and voids. Drones, helicopters or aeroplanes can access areas where rough terrain makes entry by vehicle difficult, reducing intrusiveness, time and costs associated with traditional exploration methods.

4.3 FIELD SURVEYS

Through literature reviews and remote sensing, smaller areas of interest are identified within the EPL. In-field surveys will be carried out to focus on these areas of interest. It typically involves geologists studying the areas on foot. Any aboveground structures, rocks and features which could not be identified via remote sensing, are recorded and mapped. This complements the existing information gathered for the area and may further reduce the area of interest. Field surveys are not typically very invasive and destructive in nature.

4.4 GEOPHYSICAL SURVEYS

Some geophysical surveys can be achieved via remote sensing (e.g. ground penetrating radar) while others require field work. Examples of typical geophysical surveys that the Proponent may conduct are:

Electrical resistivity tomography: - This method produces a subsurface "image" by measuring electrical resistivity of the ground. It requires the placement of electrodes directly into the ground, either along a straight line or in a grid. A known electrical current is passed into the ground via a pair of electrodes and the voltage difference is measured between other pairs of electrodes. The voltage difference is then used to calculate the resistivity of the subsurface and is presented as a resistivity profile or tomogram. Based on known resistivity values of materials, the composition and properties of the subsurface can be inferred.

Induced Polarisation: It is used to identify subsurface materials by measuring their electrical chargeability. As with electrical resistivity tomography, an electrical current is injected into the ground. Materials like sulphide minerals, clays and graphite become polarised (i.e. temporarily

store electrical charge). When the current is stopped, the stored charge is released and this is measurable as voltage decay.

Audio-Magnetotelluric Surveys: This method measures variations in natural electromagnetic fields to investigate the subsurface. Sensors placed on the ground measures the electric and magnetic fields and the results are used to calculate subsurface resistivity values. These in turn provide information on the different geological structures and materials.

For all three methods described, when conducted in the field, the survey area (line or grid) requires some vegetation clearing to allow access and expose bare ground for equipment placement. For electrical resistivity tomography and induced polarisation, small-diameter holes must be made in the ground to insert the electrodes. Due to the extremely dense vegetation in the EPL area, coupled to the lack of roads, aerial geophysical surveys are likely to be performed. This will entail flying transects with a helicopter fitted with geophysical survey equipment, over the area (Photo 4-3).

Overall, these techniques are less invasive than exploratory drilling. Based on the results, the area of interest may be reduced in size, to focus on areas with greater potential for minerals.

Photo 4-1 Cleared line for geophysical survey

Photo 4-2 Example of a geophysical survey

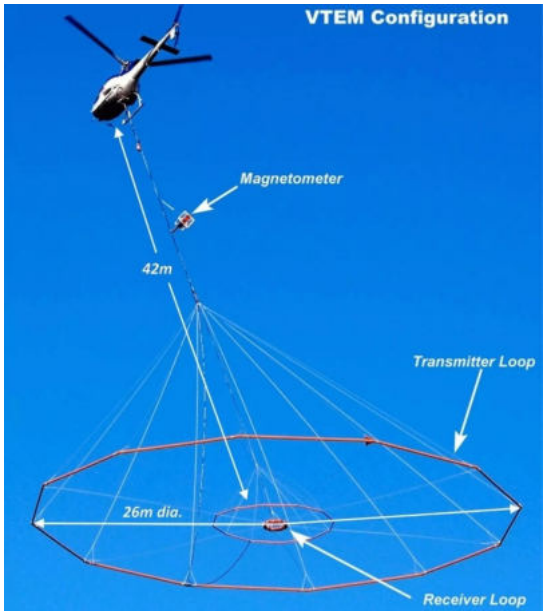

Photo 4-3 Example of aerial geophysical survey (Parsin et al. 2021)

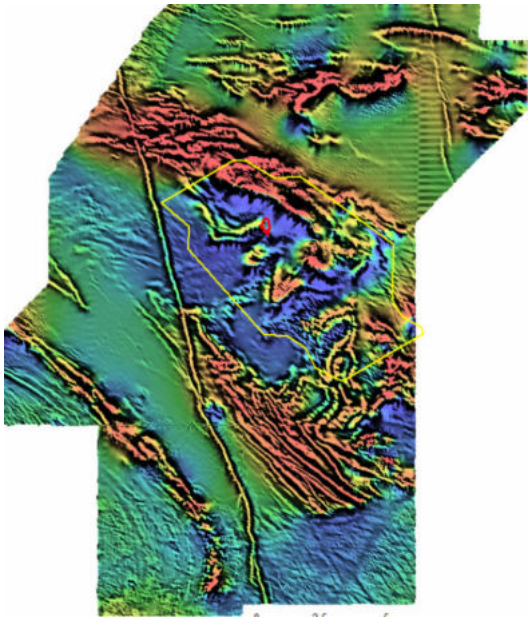

Photo 4-4 Example of airborne magnetics (from Bourne and Pittard, 2009)

4.5 GEOCHEMICAL SAMPLING

Geochemical sampling will entail the collection of soil and rock material from the surface or shallow subsurface. This may entail some shallow localised digging making use of manual labour. The Proponent does not make use of trenching. Samples are analysed for mineral content and provides valuable information on the potential presence of mineral resources.

Photo 4-5 Soil sampling

Photo 4-6 Meticulous record keeping

4.6 EXPLORATION DRILLING

Once all the information from the above methods have been compiled and analysed, very specific areas may be targeted for exploratory drilling. Drilling will mainly be performed with a diamond core drill that may be self-propelled or mounted on a truck. The core drill extracts cylindrical samples (cores) from the subsurface which can be studied and analysed to understand the geology and presence of minerals at that specific location. Drilling can however, also be carried out using reverse circulation methods, which produce drill chips rather than cores.

Level drill pads will be created at each drill target to allow for placement of the drill rig (Photo 4-7 and Photo 4-8). The drill site will be fenced off with a temporary wire mesh fence. For diamond core drilling the hollow drill bit is impregnated with industrial grade diamonds for cutting through rock. As the drill bit is pushed into the ground, the core sample is collected in the hollow drill bit. Periodically the dill string is lifted to the surface, the core collected and stored in core trays, and detailed notes made on the depth at which the core was collected. Water or drilling fluid is circulated in the borehole to cool down and lubricate the drill bit. This ensures the longevity of the drill bit. The liquid expelled from the borehole is directed into a series of drilling fluid sumps where solids settle out and the relatively clean liquid from the last sump are re-used.

For reverse circulation drilling the drill rod is inside a tube and high pressure air generated by a compressor is forced down the space between the rod and tube. This forces drill cuttings and dust up the hollow drill string to the surface. At the surface dust is mostly blown away and the drill chips are collected in separate bags / containers corresponding to set depth intervals.

Restricted areas in the drill site will be demarcated with danger tape and signage to indicate dangerous areas. Support infrastructure at the drill camp will include a diesel bowser, possibly a compressor if reverse circulation drilling is conducted, a water tanker, spare parts and equipment, tents, portable toilets and showers, cooking facilities, firefighting equipment, etc. Once drilling is

complete, the borehole will be capped and marked (Photo 4-11). The area will be cleared of all infrastructure, waste products, etc., and the drill pad and surroundings will be ripped and contoured, if needed, to allow for easy re-establishment of vegetation (Photo 4-12). All roads not needed for future use by the landowner will also be rehabilitated. Vegetation re-growth is reliant on rain.

Photo 4-7 Core drilling site

Photo 4-8 Core drilling site

Photo 4-9 Safety signage and demarcation of restricted areas at drill site

Photo 4-10 Firefighting equipment at drill site

Photo 4-11 Borehole

Photo 4-12 Rehabilitated drill site

4.7 GENERAL

Prior to any access to an EPL area, surface access agreements must be negotiated and signed with land owners. Such agreements will clearly stipulate the landowners' requirements and expectations. The first agreement will cover activities up to geophysical surveys and geochemical

sampling. Should a target site for core drilling be identified, a new agreement will be reached with the land owner.

Four wheel drive vehicles, numbered and marked as being the property of the Proponent, will be used to transport staff to the site and back. Access to target areas on the farm will at all times be gained via existing roads. Where no roads are present, roads will be made as per agreements reached with land owners. Such roads will preferably be made by means of manual labour in order to reduce the impact on the soil. The Proponent's team will only access the farms during the day between 08:00 and 17:00 and only during pre-arranged schedules. In the eventuality of an emergency or delay, where the team will be on the land outside these hours, the land owner will be contacted. The Proponent's team will wear easily recognisable clothing with reflector vests.

The Proponent's staff will always make use of established off-site accommodation establishments, unless the landowner has such facilities available themselves, or if no nearby facilities exist. Only in the latter case, arrangements will be made with the land owner for a temporary accommodation camp on the farm. A temporary campsite may then be required in the drilling area.

Waste will be collected in designated bins (Photo 4-13) and removed on a regular basis. Waste will be transported to an approved municipal or designated dumping site. Where a bin is not available nearby during work (e.g. during field surveys), waste will be contained and taken directly to a bin when departing for the day. Spill kits for any hydrocarbons will be present at all times during drilling (Photo 4-14).

Mobile chemical toilets are used where a team is stationed in the same area for an extended period (e.g. at a camping site) (Photo 4-15). The contents of the toilets are collected in tanks and removed from the site for disposal at a designated sewage disposal area.

Water used for drilling will, if agreed upon, be obtained from the farmer. Where sufficient water is not available, a new borehole may need to be drilled or water will be carted to the site with a water tanker. Drinking water will be supplied by the Proponent.

Once drilling is complete, the boreholes will be cased and capped or it will be backfilled. All waste and infrastructure will be removed from site. The drill pad and surroundings will be ripped and contoured, if needed, to allow for easy re-establishment of vegetation. All roads not needed for future use by the landowner will also be rehabilitated.

Photo 4-13 Waste bin

Photo 4-14 Spill kit

Photo 4-15 Mobile toilet

Photo 4-16 Designated smoking area

5 ALTERNATIVES

5.1 LOCATION ALTERNATIVES

The project location (EPL area) is dictated by the suspected presence of mineral resources and as determined by the MIME. Alternative locations in terms of the project location are not considered in this assessment. Within the EPL area, the Proponent can however consider alternatives, as far as is practical, in terms of the areas that may require clearing for geophysical surveys, roads, drilling pads, etc. Such alternatives will in part be limited by the target. If a target is within a very small footprint, geophysical surveys and drilling cannot be moved out of that footprint. However, roads leading to these areas, that may need to be cleared, should consider the avoidance of habitats with dense or unique indigenous or protected vegetation, avoiding areas with nests or burrows, as well as land owner preference.

5.2 EXPLORATION ACTIVITIES

The Proponent already implements various alternatives in their approach to exploration in order to reduce the potential impact on the environment and the land owners. These are summarised in Table 5-1. The assessment of impacts is based on the use of the preferred alternatives as presented. The preferred alternatives have further been incorporated into the EMP.

Table 5-1 Alternative comparison table

Alternative	Advantages	Disadvantages	Preferred Alternative
Method for Geophysical Surveys			
In field surveys	Less expensive Equipment readily available	Clearing survey lines is time consuming	Aerial survey
Aerial surveys	Quick coverage of large areas No need for clearing dense vegetation	Expensive Noise can scare wildlife and livestock	
Clearing Method for Roads, Drill Pads, Etc.			
Bulldozer	Time saving Can easily clear and level difficult terrain Less labourers on site which may be favoured by land owner	Heavy machinery compacts ground (ecologically unfriendly) Less employment Fixed width of cleared area which may be wider than needed	Manual labour as far as is practically possible

Alternative	Advantages	Disadvantages	Preferred Alternative
Manual Clearing (Labourers with axes, spades etc.)	More employment Ecologically more friendly Can keep footprint of impact to a minimum	Time consuming More labourers on the land which may not be favoured by land owner More vehicle movement to transport labourers Not suited for very difficult or hard to reach areas	

6 ADMINISTRATIVE LEGAL AND POLICY REQUIREMENTS

To protect the environment and achieve sustainable development, all projects, plans, programmes and policies deemed to have adverse impacts on the environment require an environmental assessment, as per the Namibian legislation. The legislation and standards provided in Table 6-1 and Table 6-3 govern the environmental assessment process in Namibia and/or are relevant to the mineral resources exploration sector.

Table 6-1 Namibian law applicable to the project

Law	Key Aspects
The Namibian Constitution	♦ Promotes the welfare of people ♦ Incorporates a high level of environmental protection ♦ Incorporates international agreements as part of Namibian law
Environmental Management Act Act No. 7 of 2007, Government Notice No. 232 of 2007	♦ Defines the environment ♦ Promotes sustainable management of the environment and the use of natural resources ♦ Provides a process of assessment and control of activities with possible significant effects on the environment
Environmental Management Act Regulations Government Notice No. 28-30 of 2012	♦ Commencement of the Environmental Management Act ♦ Lists activities that requires an environmental clearance certificate ♦ Provides Environmental Impact Assessment Regulations
Minerals (Prospecting and Mining) Act Act 33 of 1992, Government Notice No. 199 of 1992	♦ Provides for the reconnaissance, prospecting and mining for, and disposal of, and the exercise of control over, minerals in Namibia; and provides for matters incidental thereto ♦ Requires mining companies to obtain permission to access land for prospecting or mining
Soil Conservation Act Act No. 76 of 1969	♦ Law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources in Namibia
Water Resources Management Act Act No. 11 of 2013	♦ Provides for management, protection, development, use and conservation of water resources ♦ Prevention of water pollution and assignment of liability ♦ Requires permitting for all borehole drilling activities in Namibia
Water Resources Management Act Regulations Government Notice No. 332 of 2023	♦ Regulations pertaining to the management, protection, development, use and conservation of water resources ♦ Provides for the regulation and monitoring of water services and to provide for incidental matters ♦ Requires permitting for all borehole drilling activities in Namibia
Forest Act Act 12 of 2001, Government Notice No. 248 of 2001	♦ Makes provision for the protection of the environment and the control and management of forest fires ♦ Provides the licencing and permit conditions for the removal of woody and other vegetation as well as the disturbance and removal of soil from forested areas

Law	Key Aspects
Forest Regulations: Forest Act, 2001 Government Notice No. 170 of 2015	♦ Declares protected trees or plants ♦ Issuing of permits to remove protected tree and plant species ♦ Provides the legal framework for the establishment and management of community forests ♦ Emphasizes sustainable forest management and the involvement of local communities
National Heritage Act Act No. 27 of 2004, Government Notice No. 287 of 2004	♦ Provides for protection and conservation of places and objects of heritage significance and the registration of such places and objects
Civil Aviation Act Act No. 6 of 2016, Government Notice No. 137 of 2016	♦ Consolidate the laws relating to civil aviation and civil aviation offences ♦ Provides civil aviation regulatory and control framework for maintaining, enhancing and promoting the safety and security of civil aviation for ensuring the implementation of international aviation agreements ♦ Provides for the establishment of Namibia Register of Aircraft and the Civil Aviation Registry ♦ Civil aviation regulations
Petroleum Products and Energy Act Act No. 13 of 1990, Government Notice No. 45 of 1990	♦ Regulates petroleum industry ♦ Makes provision for licencing and safe storage and handling of fuels ♦ Petroleum Products Regulations (Government Notice No. 155 of 2000)
Public and Environmental Health Act Act No. 1 of 2015, Government Notice No. 86 of 2015	♦ Provides a framework for a structured more uniform public and environmental health system, and for incidental matters ♦ Deals with Integrated Waste Management including waste collection disposal and recycling; waste generation and storage; and sanitation
Labour Act Act No 11 of 2007, Government Notice No. 236 of 2007	♦ Provides for Labour Law and the protection and safety of employees ♦ Labour Act, 1992: Regulations relating to the health and safety of employees at work (Government Notice No. 156 of 1997)
Minerals Policy of Namibia	♦ Aims to achieve a high level of responsible development of national resources in which Namibia becomes a significant producer of mineral products while ensuring maximum sustainable contribution to the socio-economic development of the country ♦ To attract investment and enable the private sector to take the lead in exploration, mining, mineral beneficiation and marketing ♦ Government will provide the Minerals Ancillary Rights Commission (MARC) with clear guidelines on the process for access to land and the provision of compensation
Nature Conservation Ordinance Ordinance No. 4 of 1975	♦ Consolidates and amends the laws relating to the conservation of nature and the establishment of game parks and nature reserves ♦ Assigns certain conservation categories to specific organisms within Namibia
Atmospheric Pollution Prevention Ordinance Ordinance No. 11 of 1976	♦ Governs the control of noxious or offensive gases ♦ Prohibits scheduled process without a registration certificate in a controlled area ♦ Requires best practical means for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process
Hazardous Substances Ordinance Ordinance No. 14 of 1974	♦ Applies to the manufacture, sale, use, disposal and dumping of hazardous substances as well as their import and export ♦ Aims to prevent hazardous substances from causing injury, ill-health or the death of human beings

Law	Key Aspects
Pollution Control and Waste Management Bill (draft document)	♦ Not in force yet ♦ Provides for prevention and control of pollution and waste ♦ Provides for procedures to be followed for licence applications
Road Traffic and Transport Act Act No. 52 of 1999 Government Notice No 282 of 1999	♦ Provides for the control of traffic on public roads and the regulations pertaining to road transport
Road Traffic and Transport Regulations Government Notice No 53 of 2001	♦ Prohibits the transport of goods which are not safely contained within the body of the vehicle; or securely fastened to that vehicle, and which are not properly protected from being dislodged or spilled from that vehicle

Table 6-2 Standards or codes of practise

Standard or Code	Key Aspects
South African National Standards (SANS)	♦ The Petroleum Products and Energy Act prescribes SANS standards for the construction, operations and demolition of petroleum facilities. ♦ SANS 10131 is specifically aimed at storage and distribution of petroleum products in aboveground storage tanks. ♦ Provides requirements for spill control infrastructure.

Table 6-3 Relevant multilateral environmental agreements for Namibia related to the project

Agreement	Key Aspects
SADC Protocol on Mining, 1997	♦ Member states agree to share information on exploitable mineral resources in the region, enhance the technological capacity of the sector as well as promote policies that will encourage and assist small scale mining. ♦ Environmental and occupational health and safety issues are highlighted.
Stockholm Declaration on the Human Environment, Stockholm 1972.	♦ 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
1985 Vienna Convention for the Protection of the Ozone Layer	♦ Aims to protect human health and the environment against adverse effects from modification of the Ozone Layer are considered ♦ Adopted to regulate levels of greenhouse gas concentration in the atmosphere
United Nations Framework Convention on Climate Change (UNFCCC)	♦ The Convention recognises that developing countries should be accorded appropriate assistance to enable them to fulfil the terms of the Convention
Convention on Biological Diversity, Rio de Janeiro, 1992	♦ Under article 14 of The Convention, EIAs must be conducted for projects that may negatively affect biological diversity

Exploration is listed as an activity requiring an ECC as per Government Notice No. 29 of 2012. Ancillary activities related to exploration may also be listed as activities requiring ECCs. The following is a list of possible activities that the Proponent may engage in, in order to perform exploration.

Mining and Quarrying Activities

3.1 The construction of facilities for any process or activities which requires a licence, right or other form of authorisation, and the renewal of a licence, right or other form of authorisation, in terms of the Minerals (Prospecting and Mining Act), 1992.

3.2 Other forms of mining or extraction of any natural resource whether regulated by a law or not.

3.3 Resource extraction, manipulation, conservation and related activities.

Forestry Activities

4 The clearance of forest areas, deforestation, afforestation, timber harvesting or any other related activity that requires authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.

Additional national planning legislation considered include:

- National Development Plans (NDPs) and Vision 2030
- Namibia's Climate Change Strategy and Action Plan

Mining is a crucial component of Namibia's NDPs, particularly also in the country's long-term vision, Vision 2030. Its integration into the NDPs highlights its importance in achieving Namibia's broader economic and social goals. Some key aspects of mining in Namibia's overall development plan and vision include:

Economic Contribution: Mining contributes significantly to Namibia's GDP, export earnings, and employment. The sector is recognised as being vital for economic growth and diversification.

Strategic Focus: Previous NDPs and the upcoming NDP6, emphasise the development of the mining sector to ensure sustainable economic growth. Investment in mining is promoted and so is enhancement of value addition and environmental sustainability.

Policy Framework: Guiding principles for the development of the mining sector is present in the Minerals Policy of Namibia. It aims to create a conducive environment for investment, ensure the sector's sustainability, and maximise benefits for the Namibian people.

Recent Developments: The mining sector has seen promising developments, including establishment of new mines and the high prices of commodities like gold and uranium. These are expected to fuel further growth.

Since mining forms such a significant part of Namibia's economy, its integration into the Climate Change Strategy and Action Plan is crucial for sustainable development. Key aspects that feeds into this strategy are:

Sustainable Practices: The adoption of sustainable mining practices to minimise environmental impact is emphasised. This includes measures to reduce water usage, manage waste, and rehabilitate mining sites.

Renewable Energy: The use of renewable energy sources in mining operations are promoted. This will help to reduce greenhouse gas emissions while supporting Namibia's broader goal of increasing the share of renewable energy in its energy pool.

Community Resilience: Community-based adaptation programs are promoted with the aim of building resilience in local communities by supporting initiatives like agro-forestry, water conservation, and energy-efficient technologies.

Policy and Regulation: Policies and regulations to ensure that mining activities align with climate adaptation goals. This includes stringent environmental impact assessments and the enforcement of best practices in mining operations.

Research and Innovation: Research and innovation to develop new technologies and methods for more sustainable mining and resilience to climate change.

7 ENVIRONMENTAL CHARACTERISTICS

This section lists the most important environmental characteristics of the study area and provides a statement on the potential environmental impacts on each.

7.1 LOCALITY AND SURROUNDING LAND USE

The EPL area is 80,205.7087 ha in size and 96% overlaps the Okarukambe Constituency and 4% the Windhoek Rural Constituency of the Omaheke and Khomas Regions respectively (Figure 7-1). The EPL's western boundary is about 90 km east of Windhoek, while the eastern boundary is about and 160 km east of Windhoek and 50 km northwest of Gobabis. Omitara is a declared settlement located in the EPL. It has a railway station which is not in use (Photo 7-1), a primary school, a police station and a clinic. It used to have a functioning hotel (Photo 7-3). Gobabis hosts the Omaheke Regional Council and offers most of the general goods and services required by farm owners that may be required by the exploration team. All the land in the EPL is commercial

farmland mainly used for livestock farming and game farming with trophy hunting. Very limited horticulture in the form of dryland cropping is practiced by some of the farmers.

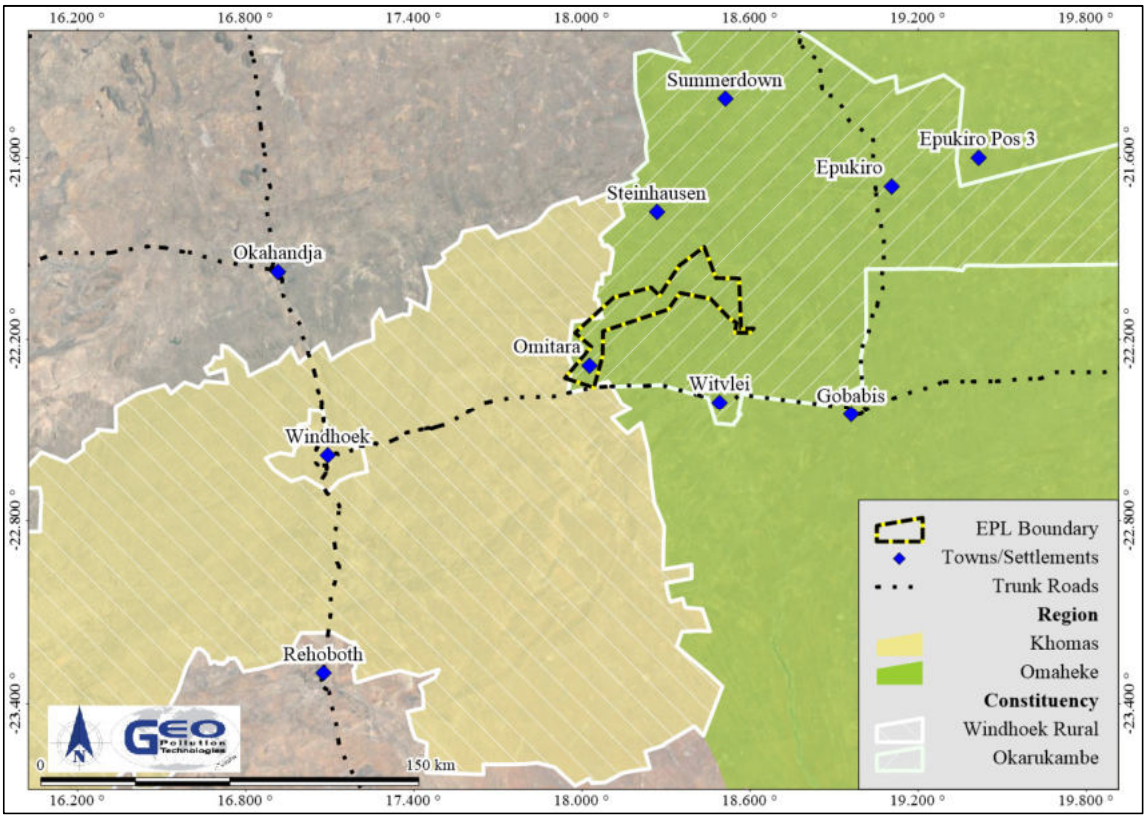

Figure 7-1 Location of EPL in context to the Omaheke Region

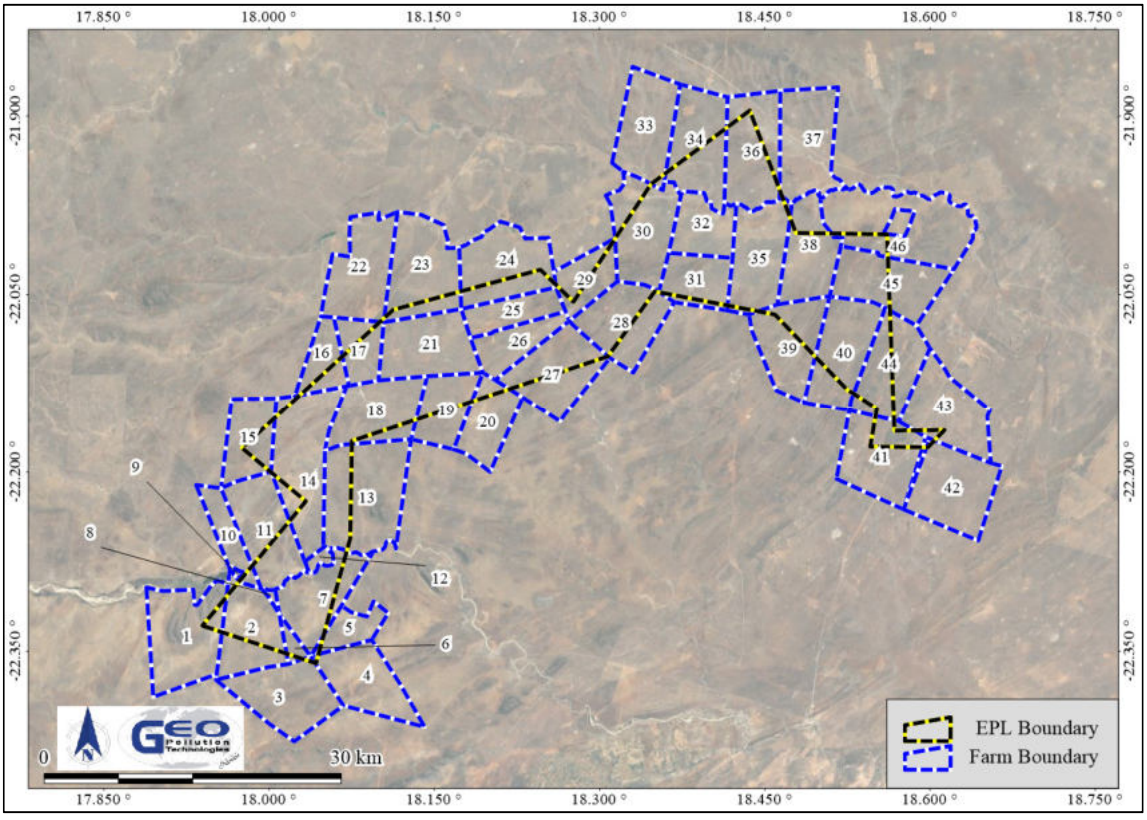

Figure 7-2 Farms and communal area overlapping with the EPL (refer to Table 7-1)

Table 7-1 Details of farms overlapping the EPL

Number on Map (Figure 7-2)	Farm Name	Farm No.	Number on Map (Figure 7-2)	Farm Name	Farm No.
1	Otjivero	FMK 202	24	Iowa	FML 133
2	Omitara-west	FMK 203	25	Riviersdal	FML 134
3	Fulma	FMK 204	26	Riviersdal	FML 134/00001
4	Astra	FMK 205	27	Protea	FML 135
5	Buschow	FML 108/00002	28	Marigold	FML 136
6	Omitara-west	FMK 203/0000A	29	Idaho	FML 137/00001
7	Omitara	FML 109	30	Spinosa	FML 138
8	Omitara	FML 109/0000A	31	Riviera	FML 139/0000B
9	Geiersberg	FMK 00201/00001	32	Riviera	FML 00139/0000A
10	Geiersberg	FMK 00201/00REM	33	Heatherbelle	FML 00197
11	De Hoop	FML 00110	34	Rogers	FML 00196
12	Rooikraal		35	Schoch	FML 00193
13	Gross Osombahe	FML 01042	36	Stoetzer	FML 00195
14	Rooikraal	FML 01023	37	Okapaue West	FML 00194
15	De Hoop North	FML 00129	38	Mundsfarm	FML 00192
16	Kanonschoot	FMK 00131	39	Rooigrond	FML 00144
17	Nuwe Orde	FML 00826	40	Mex	FML 00145
18	Osombahe Nord	FML 01019	41	Ongava-onuea	FML 00147
19	Omatewa Noord	FML 00126/00001	42	Okasandu	FML 00158
20	Omatewa Noord	FML 00126/00002	43	Gottesgabe	FML 00159
21	The Mark	FML 00132	44	Delville	FML 00146
22	Apex	FML 00327	45	Hetaku	FML 01035/00051
23	Boomlager	FML 00328	46	Hetaku	FML 01035/00REM

Photo 7-1 Omitara Railway Station (Not functioning)

Photo 7-2 Abandoned house on a farm in the EPL

Photo 7-3 Old Omitara Hotel and shop (not in business)

Photo 7-4 Black Nossob Conservancy

Implications and Impacts

The EPL area overlaps commercial farms. This necessitates surface access agreements to be reached between the Proponent and private land owners.

7.2 CLIMATE

A general lack of weather stations in Namibia, especially in rural areas, is problematic when attempting to get accurate climate data and descriptions for specific locations. Most of the weather stations that were operational in the mid to late 1900's have been closed. Climate descriptions are thus based on old measured data, crudely extrapolated for Namibia, and modelled data from satellite imagery. The following is thus a general description of the expected climatic conditions in the EPL area. Geographical features such as hills, river courses, low and high laying areas can significantly influence localised weather and especially temperatures. Data was extracted from the 2022 Atlas of Namibia unless otherwise specified (Atlas of Namibia Team, 2022).

According to the Köppen-Geiger Climate Classification system the project is located in a hot semi-arid climate (BSh) (http://koeppen-geiger.vu-wien.ac.at/present.htm). This means that the area receives precipitation below potential evapotranspiration, but not as low as a desert climate, and, has a mean annual temperature of at least 18°C.

Atlas of Namibia data indicates the average rainfall range as 300-2350 mm/a within the west of EPL area, increasing to 300 to 350 mm in the northeast of the EPL area. Variation in annual rainfall is between 30 to 40% which means rainfall is unpredictable. Monthly rainfall usually peaks from December to March with on average between 240 and 280 mm in the west of the EPL in these months, increasing to 270 to 310 mm in the northeast. A comparison of this data can be made with long term precipitation data obtained from the CHIRPS-2 database (Funk et al., 2015). The CHIRPS-2 dataset (Climate Hazards Group Infra-Red Precipitation with Station data version 2) consist of long-term rainfall data (1981 to near-present) obtained from satellite imagery and in-situ station data and therefore represents more recent data. Data is averaged over an area of

roughly 5 km by 5 km. This averaging effect should be kept in mind during data analyses as high rainfall from single thunderstorm cells would be averaged out, thereby providing a reduced daily maximum rainfall value. Due to the size of the EPL area, precipitation data for forty-nine 25 km^2 areas were used. The climate data for the EPL area is presented in Table 7-2. The average annual precipitation for the EPL area over the last 43 years was calculated as 353 mm/a, with a coefficient of variance of 32%. The rainfall pattern correlates with the Atlas of Namibia data. Heavier precipitation (single day events) occur between January and April with a single event of 56 mm in April (last 43 years data) being the highest total in the area. Maximum precipitation received over a 3-day period was 96 mm/25 km^2, indicating that heavy rainfall over long periods is not a common occurrence. Daily and seasonal precipitation data (Funk et al., 2015) is presented in Table 7-2 and in Figure 7-3. Figure 7-3 presents seasonal (July to June) total precipitation, centred on the average line for the last 43 years, with the daily total precipitation and the seasonal cumulative precipitation. It is clear that 7 out of the last 10 seasons received below average rainfall.

Potential evapotranspiration for the area is high at between 2,400 and 2,500 mm/a. By dividing the mean annual potential evapotranspiration into the mean annual precipitation, an aridity index value for the area was computed as 0.16, which indicates the area to be arid.

Table 7-2 Rainfall statistics based on CHIRPS-2 data (Funk et al., 2015)

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Minimum (mm/m)	13.09	17.93	10.64	9.11	0.00	0.00	0.00	0.00	0.00	0.00	5.79	10.99
Maximum (mm/m)	267.82	192.59	148.56	136.63	10.02	1.14	0.57	0.06	6.79	39.26	88.93	176.28
Average (mm/m)	77.04	76.27	62.28	37.16	1.78	0.10	0.05	0.01	1.14	9.72	27.49	57.12
Variability (%)	68.26	60.59	50.80	76.29	147.36	254.94	301.66	247.79	159.65	85.60	67.71	65.22
Daily Maximum (mm)	48.07	40.14	35.63	55.62	6.51	0.67	0.51	0.06	3.29	11.67	20.29	33.51
Average Rain Days	14.81	13.77	10.74	6.93	1.79	0.56	0.33	0.28	1.65	6.07	10.28	12.56
Season July - June average 353.21					Season coefficient of variation: 32.85				3 Day return period: 95.86			
Date range:		1981-Jan-01	to	2024-Jun-30			Lat: 22.097°S			Long: 18.204°E		
Number of stations: 49					Statistical deviation of the seasonal average:					353.21 mm/a ±9.9 mm/a		

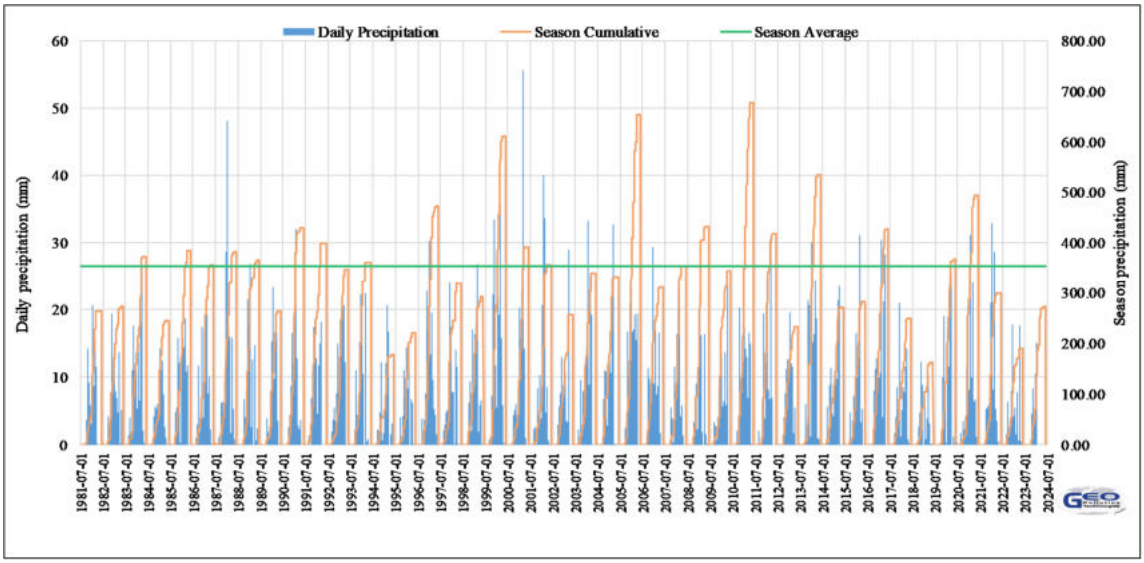

Figure 7-3 Daily and seasonal rainfall from CHIRPS-2 data (Funk et al., 2015)

Similar to precipitation data, temperature data is also lacking for the project area, with the Atlas of Namibia presenting only crude, large scale averages. To have an idea of temperatures in the area, monthly temperature data was retrieved from the Modern-Era Retrospective analysis for Research and Applications version 2 (MERRA-2) data set for a height of 2 m above surface (Ronald Gelaro, et al., 2017). This data set is a NASA atmospheric reanalysis, incorporating satellite data integration and aims at historical climate analyses at 0.5° x 0.625° spatial resolution. This translates to roughly 3,640 km², which still is a large area, but is somewhat less crude than the Atlas data.

Table 7-3 presents statistics of daily data abstracted from the MERRA-2 data set for 41 years. The lowest temperature of -5.71 °C was recorded in July, with sub-zero temperatures occurring relatively frequently in winter months. The average annual minimum temperature is 2.1 °C. A maximum temperature of 38.9 °C was measured in October, while the average annual maximum temperature is very high at 35.1 °C. The average annual temperature range is 19.7 °C, while the average diurnal temperature (difference between daily minimum and maximum temperature) for this area is around 25 °C. Direct normal solar irradiance for the area is 7.978 kWh/m²/day. Electricity generation with photovoltaic installations will thus be efficient in the area.

Figure 7-4 indicates modelled wind data, which has been generated using satellite data, for a location in the middle of the EPL. Wind patterns throughout the EPL may be altered by localised topography. Strong winds are more frequent from the north-northeast to east-northeast, with less frequent, lower velocity winds from the northwest, south and east. West-southwest winds are infrequent and of low velocity (calm).

Table 7-3 Temperature statistics based on Merra-2 data (Ronald Gelaro, et al., 2017)

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Minimum (°C)	6.98	9.75	5.00	2.87	-1.21	-3.58	-5.71	-2.72	-0.20	1.58	4.60	8.27
Maximum (°C)	38.86	38.20	37.87	34.48	30.88	28.03	28.79	32.04	35.53	38.82	38.68	38.50
Average (°C)	24.96	24.06	22.31	19.15	16.06	13.09	12.59	15.33	19.03	21.82	23.44	24.71
Diurnal (°C)	21.91	20.79	21.60	22.79	24.37	25.30	26.49	28.58	29.26	27.56	26.02	23.63
Season July - June				Seasonal average Temperature: 19.71								
Date range:	1980-Jan-01	to	2021-Sep-30		Lat: 22.097°S					Long: 18.204°E		

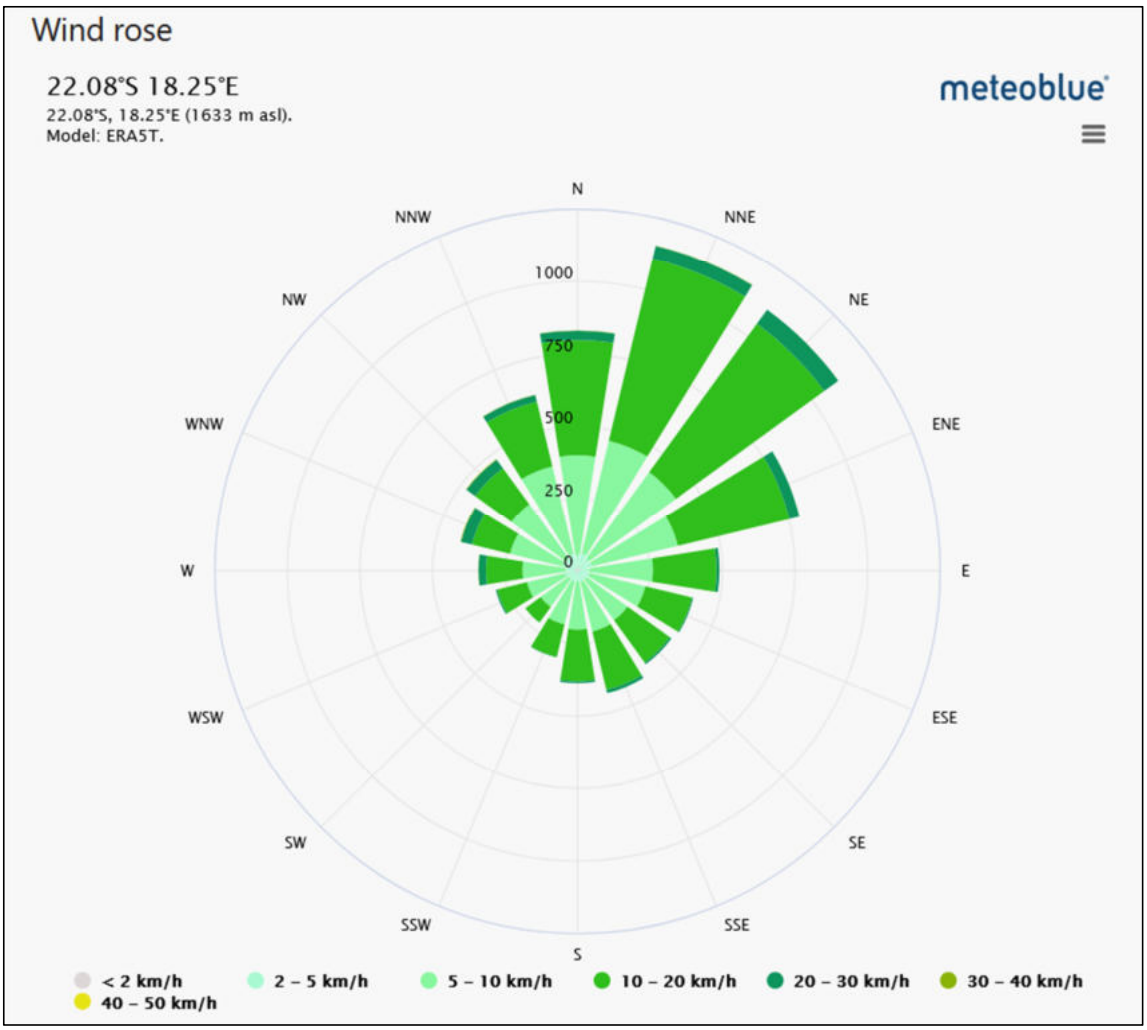

Figure 7-4 Average wind speed and direction (https://www.meteoblue.com)

Implications and Impacts

Rainfall events are often thunderstorms with heavy rainfall that can occur in short periods of time (cloud bursts). High intensity and erratic rainfall events may result in flash floods along the surrounding river courses and make driving conditions on gravel roads dangerous. Rainfall may result in the leaching of pollutants or hazardous substances into groundwater. Frequent high temperatures experienced in the area poses a risks to employees who can become dehydrated or get sunstroke. Sunburn is also a high risk as the solar radiation levels are high. Wind may carry dust and noise to nearby receptors.

7.3 TOPOGRAPHY AND DRAINAGE

The project overlaps the Kalahari Sandveld, a flat, basin of sedimentation, much of which is characterised by aeolian landforms, including linear dunes and pans. The Kalahari Sandveld landscape formed through the accumulation of sand from river flow in a wetter climate during post Gondwana breakup. These sediments were reworked during a subsequent drier period. Today relict dunes remain at places from this former drier climate period.

Ground surface elevation in the EPL area ranges from 1,540 mamsl in the east to 1,660 mamsl toward the west. The overall relief gently slopes to the east (Figure 7-5), creating a landscape that can be characterised as flat to slightly undulating with slopes of less than 5° (Figure 7-7). Notably, there are no significant features such as hills or mountain in the EPL area, which contributes to its relatively even topography. The general absence of prominent topographical features suggests minimal natural barriers to surface drainage and wind patterns, allowing for relatively uniform environmental conditions across the area.

The primary surface drainage features surrounding the EPL as mentioned above in the Black and White Nossob Rivers, along with their tributaries. These rivers cut through the EPL area in a west to east direction. This resulted in two distinct watersheds or drainage areas that overlap with the EPL. The surrounding drainage system plays a crucial role in the region's hydrology, affecting the surface water flow and potential for runoff, which in turn impacts the local ecosystem and land use patterns (Figure 7-5 and Figure 7-6).

Implications and Impacts

Surface water runoff can act as a transport medium for pollutants or hazardous substances. Due to the flat land surface and sandy soils, very little runoff will occur and pollutants will likely infiltrate into the subsurface.

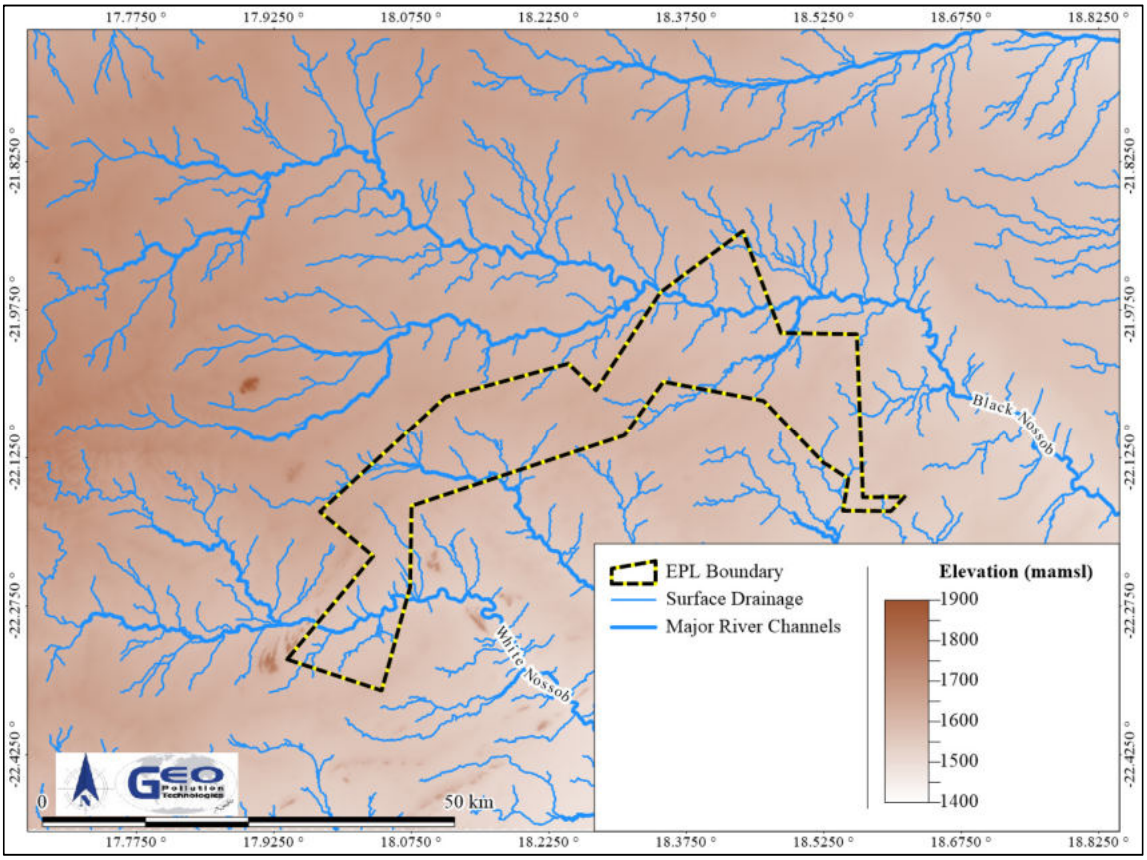

Figure 7-5 Elevation changes and surface drainage within the EPL area

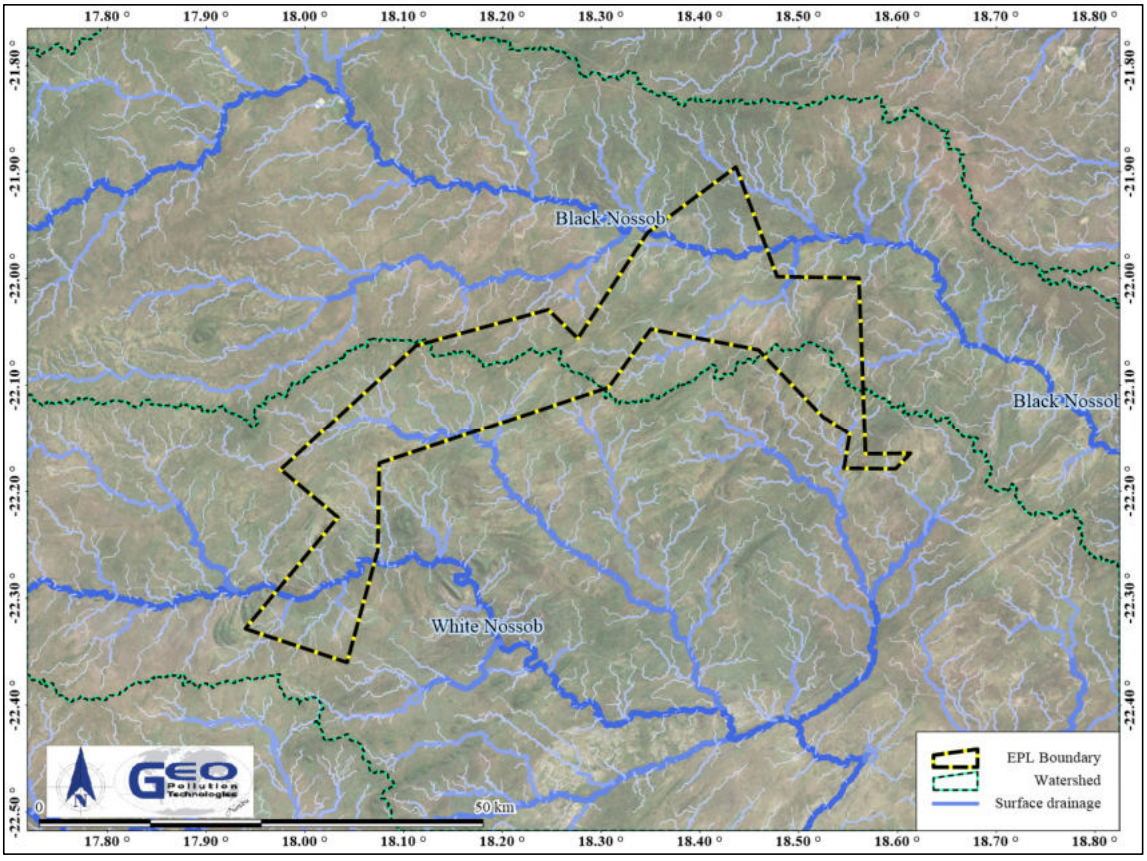

Figure 7-6 Watersheds and surface drainage

7.4 GEOLOGY

Four different soil types can be found in different portions of the EPL area. The dominant soil type for the majority of the EPL area is Calcaric Chromic Cambisol. Three other soil types encountered are Chromic Cambisol (Arenic), Fluvisol (Arenic) and Lithic Leptosol (Figure 7-8). Cambisols show early signs of horizon development and Calcaric Chromic Cambisol is soil that is moderately developed, has visible colour differentiation and has a notable lime (calcium carbonate) content. Chromic Cambisol (Arenic) is a soil with less lime and with a more sandy texture. It also has a lower water holding capacity than Calcaric Chromic Cambisol. Arenic Fluvisol is a stratified, sandy alluvial soil mostly associated with river valleys and coastal plains. In the EPL area it is associated with the Black Nossob River. Lithic Leptosol is a very shallow (<10 cm) soil, often associated with mountainous and rocky landscapes.

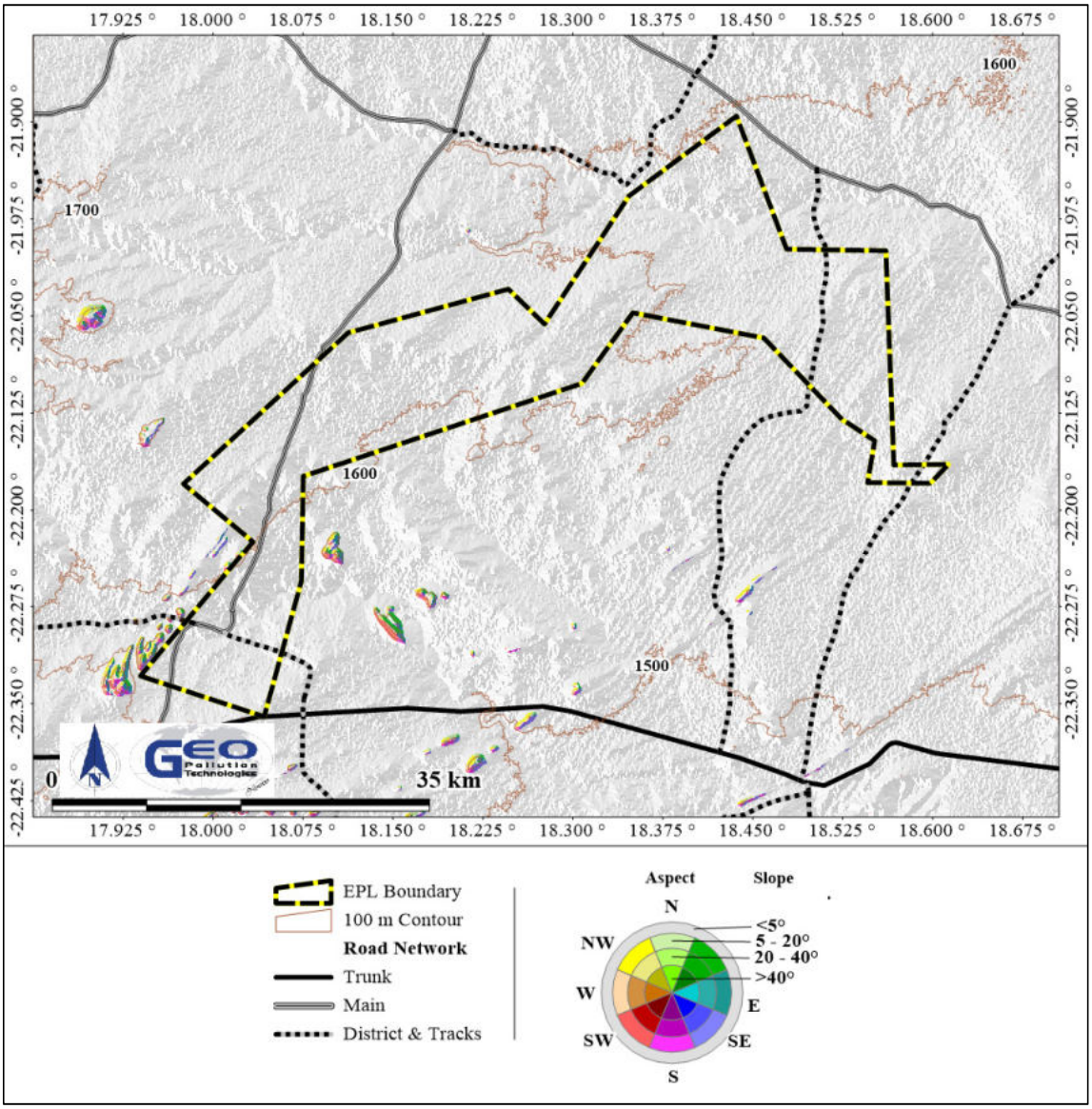

Figure 7-7 Slope-aspect map

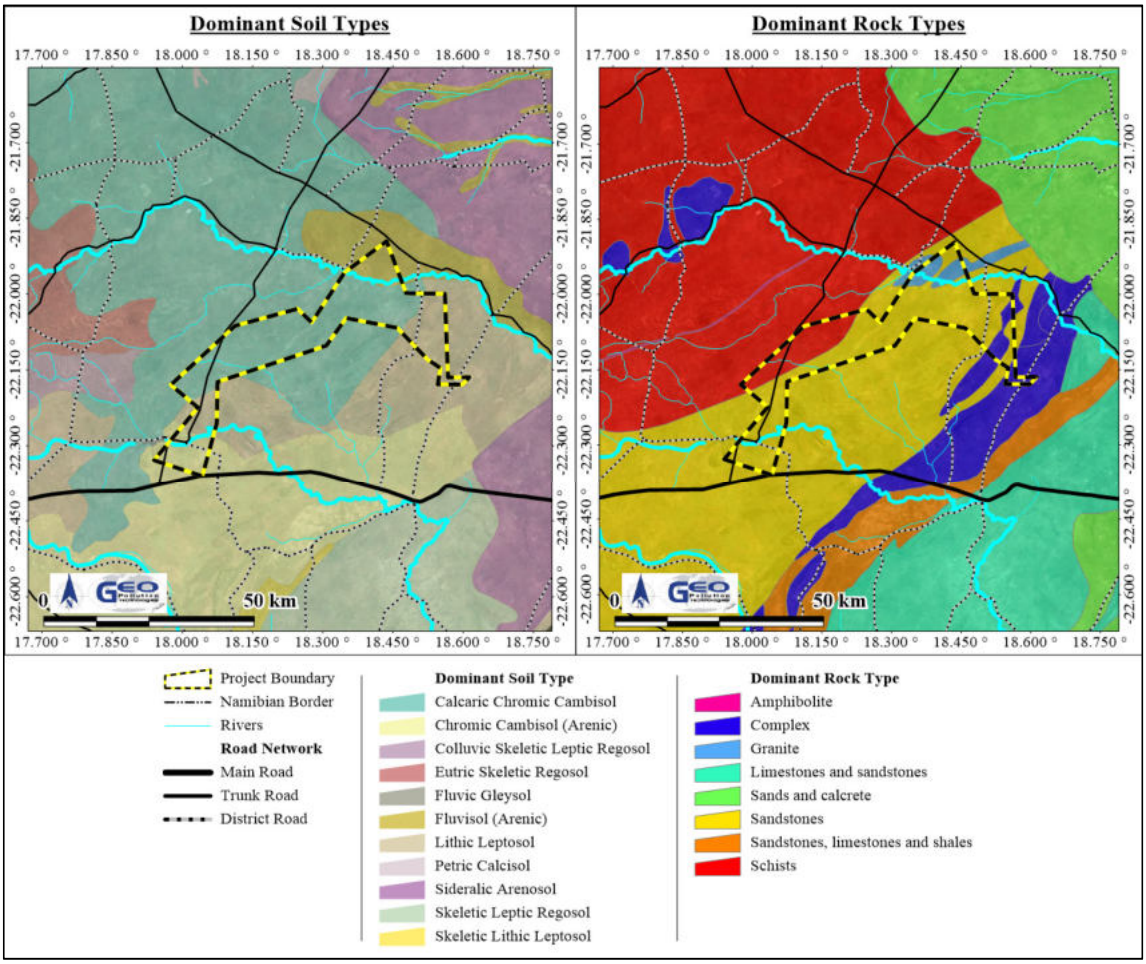

Figure 7-8 Soils and rock types

The geology underlaying the EPL area ranges from the Mokolian and Namibian Age (Damara Sequence) to Quaternary Age (Kalahari Group). Quaternary Age deposits comprises of Kalahari sediments which includes sand, calcrete and gravel. These Kalahari sediments originated mainly from fluvial deposition and were reworked through aeolian processes. The thickness of the Kalahari sediments is expected to form a thin veneer which is partly cemented with calcium carbonate to form lime cemented sandstones and calcrete.

There is an unconformity between the Kalahari sediments and the older underlaying Damara formations. The Damara Sequence is divided into various tectonostratigraphic zones and it is inferred from literature that the EPL area is likely located cross the Southern Zone and the Southern Margin Zone of the Damara Sequence. The Frontal Thrust (Miller, 2008) and characterised by thrusting and folding, resulting in northeast trending anticlines and synclines is located in the south-eastern corner of the EPL. Locally the Damara Sequence comprises of various undifferentiated feldspathic quartzite, schists, conglomerates and / or marbles of the Nosib – and Swakop Groups. Intrusions from Salem granites are present to the southwest of the EPL, with limited granite outcrops from the older Gamsberg Suite and the Marienhof Formation (Rehoboth Sequence) in a north-eastern direction through the centre of the EPL.

This Damara fold belt overprints Mesoproterozoic volcanic and intrusive rocks. A zone of roughly 1,000 km long and 250 km wide, also referred to as the Kalahari Copper Belt occurs discontinuously from western Namibia and stretches into northern Botswana along the north-western edge of the Paleoproterozoic Kalahari Craton. The belt contains mainly copper mineralisation, which is generally strata bound and hosted in metasedimentary rocks that have been folded and metamorphosed to greenschist facies (Lehmann et al., 2014).

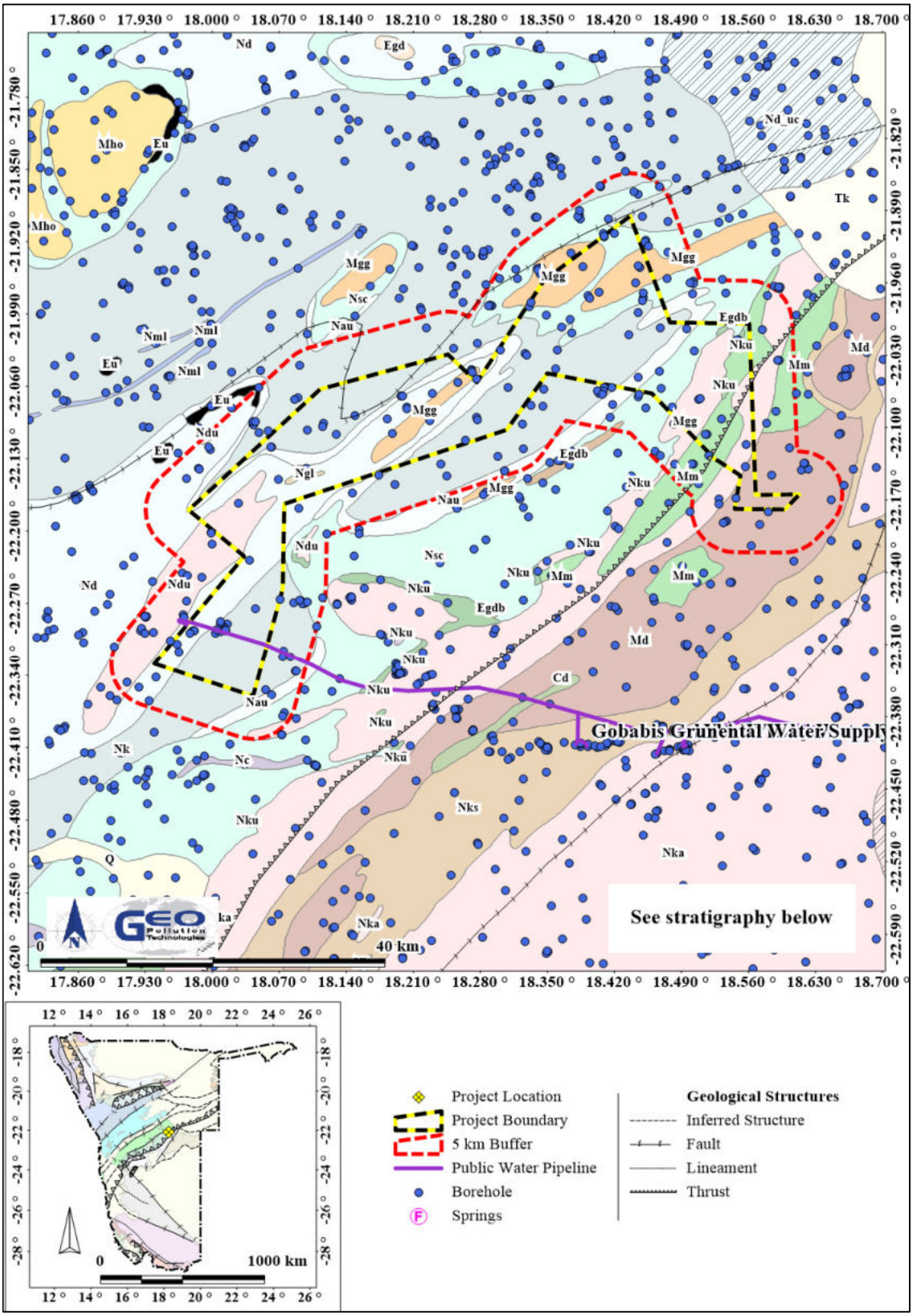

Figure 7-9 Geology

Table 7-4 Stratigraphy

Age	Lithcode	Sequence	Group	Subgroup	Formation	Complex	Intrusive_Unit	Suite	Rocktypes	Remarks
Quaternary	Q								Alluvium, sand, gravel, calcrete	
Quaternary and Tertiary	Tk		Kalahari						Sand, calcrete, gravel	
Permo-Carboniferous	Cd	Karoo			Dwyka				Tillite, boulder shale, shale, sandstone, limestone	
Cambrian									Serpentinite, chlorite schist, talc schist	
	Egdb						Dachsberg Granit		Granite	
Namibian	Nks		Nama	Kuibis					Sandstone, black limestone, conglomerate, shale	
	Ngl							Salem	Syntectonic gneissic leucogranite	
	Nc	Damara	Otavi	Tsumeb	Ghaub				Diamictite	Previously Chuos Formation
	Nml							Matchless	Ortho-amphibolite	
	Nk		Swakop	Khomas	Kuiseb				Mica schist, minor quartzite, graphitic schist, marble	
	Nau			Khomas	Auas				Marble, schist, ortho-amphibolite, quartzite	
	Nku			Kudis					Marble, schist, quartzite, graphitic schist	
	Nsc			Khomas					Marble, schist, quartzite, calc-silicate, graphitic schist	Undifferentiated Lower Swakop Group
	Ndu		Nosib		Duruchaus				Quartzite, conglomerate, schist, marble	
	Nka_uc				Kamtsas				Quartzite, conglomerate, schist, marble	Suboutcrop below Tk, Qn and other superficial deposits
	Nka								Quartzite, conglomerate, schist, marble	
	Nd_uc								Schist, marble, quartzite, conglomerate, graphitic schist	Undifferentiated Swakop and Nosib Groups/Suboutcrop below Tk, Qn and other superficial deposits
	Nd								Schist, marble, quartzite, conglomerate, graphitic schist	Undifferentiated Swakop and Nosib Groups
Mokolian	Md				Doornpoort /Eskadron				Quartzite, conglomerate, shale, basalt, rhyolite, ignimbrite	
	Mgg	Sinclair			Guperas			Gamsberg	Granite	
	Mm	Rehoboth			Marienhof				Quartzite, phyllite, rhyolite, basalt, conglomerate, intrusive metabasite dykes	
	Mho					Hohewarte			Para-/orthogneiss, metasedimentary rocks, granite, metabasite dykes	

7.5 HYDROGEOLOGY

The EPL partly overlaps the Windhoek-Gobabis Subterranean Water Control Area. This is set forth in the Government Notice 189 of 6 February 1970 (Figure 7-10). The Act requires that all boreholes be registered and that permission to drill be obtained prior to drilling. Groundwater abstraction and effluent disposal are also regulated. The EPL falls partially in the South Eastern Kalahari Groundwater Basin. It should be noted that this groundwater basin is more of a management basin and does not strictly follow groundwater basin boundaries. Groundwater Basin committees will be formed under the Water Resources Management Act, Act No. 11 of 2013. It will likely give more powers to groundwater users in a basin to ensure sustainability of groundwater usage, but also encourage the optimal usage of groundwater.

Local groundwater flow is expected to take place through primary porosity in the surface cover (Kalahari Group), while it is expected to flow along fractures, faults, dykes/mineralised faults or along contact zones and other geological structures (secondary porosity) present within the underlaying formations. Regional groundwater flow is expected to be in a south-eastern direction Figure 7-10).

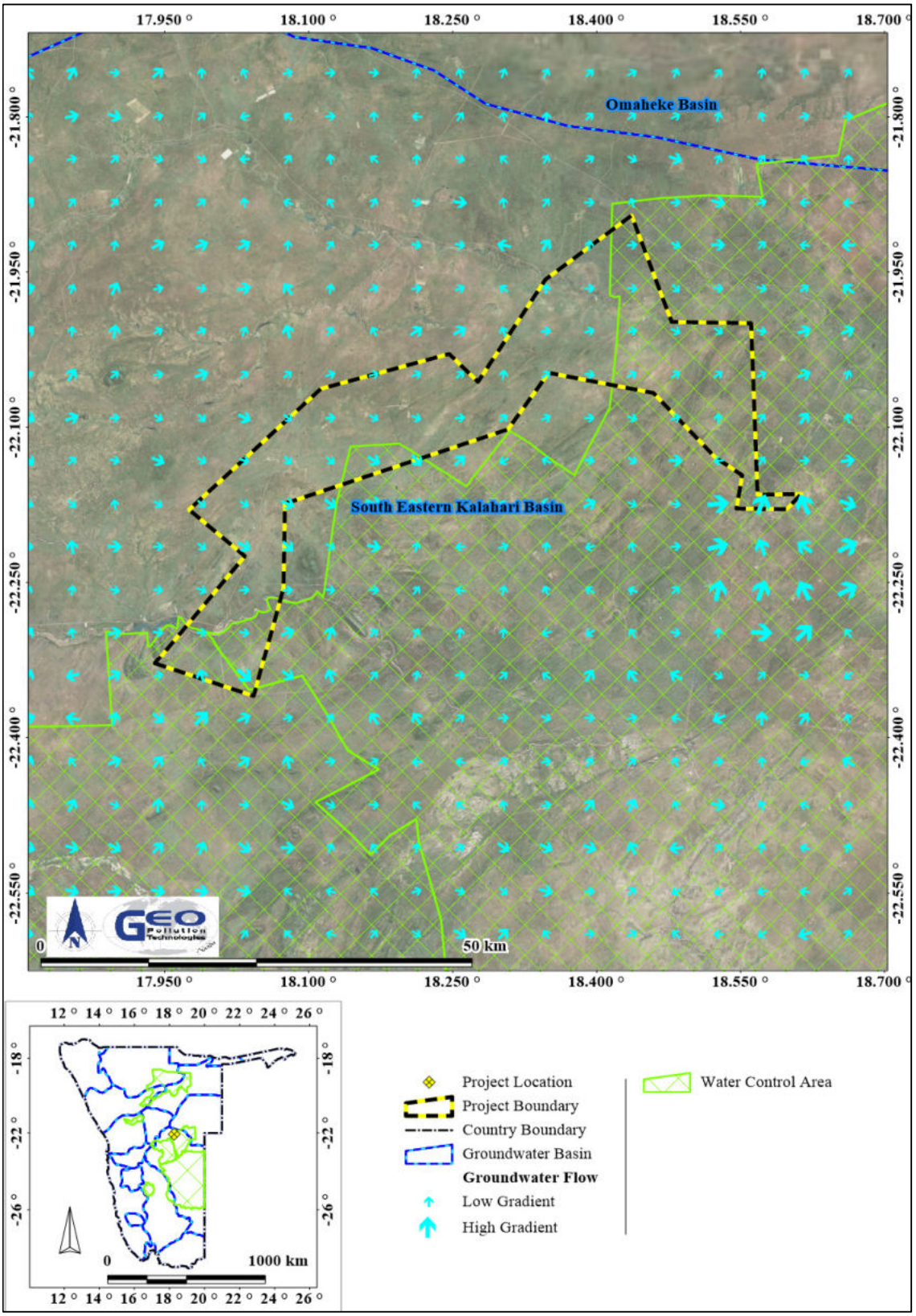

Figure 7-10 Groundwater basins and water control areas

Table 7-5 presents groundwater statistics for 240 boreholes in a 5 km radius around the EPL. The groundwater information was obtained from Department of Water Affairs (DWA) borehole database. This database is generally outdated and more boreholes might be present. The average

depth of 181 of the boreholes is 86.66 m below surface and the yield of 173 of the boreholes ranges between 0.10 and 24.00 m³/h, with an average yield of 3.54 m³/h. The average groundwater level of 136 of the boreholes is 37.42 m below surface, ranging between 1.00 m and 103.60 m below surface.

The data summarised in Table 7-5 was presented graphically in Figure 7-11. From the information presented it is concluded that an increase in depth does not correlate with an increases the borehole yields. Regionally, it is observed that half of the water quality analysis results fall in the Group A category, with exceptions being recording in the Group B and Group C concentrations for Sulphate, Nitrate and Flourite.

Implications and Impacts

Groundwater is utilised in the area and such users would be at risk if pollution of the groundwater takes place. Permeable soil and areas with shallow groundwater levels makes the groundwater vulnerable to pollution.

There is no indication of multilayer aquifers that would be intersected if exploration drilling is to take place. Care should be taken that water intersected is not allowed to flow out into the Kalahari sediments and where it happens such boreholes should be properly sealed with either back cementation or through the installation of casing that would prevent such leakage.

7.6 PUBLIC WATER SUPPLY

Water supply on all farms intersected by the EPL is from boreholes. There are however a water supply scheme where water is supplied from the Otjivero Dam, to Omitara and Gobabis. The Otjivero Dam is just outside of the western-most portion of the EPL and the bulk water supply pipeline traverses the part of the EPL (Figure 7-9).

Implications and Impacts

Public water supply may be impacted if groundwater contamination or over abstraction takes place. Special care must be taken during exploration drilling to prevent impacts on groundwater. Should exploration drilling occur, the land owners can benefit from the borehole log information, to more accurately determine where groundwater exploration can potentially be targeted.

Table 7-5 Groundwater Statistics

	DEPTH (mbs)	YIELD (m^3/h)	WATER LEVEL (mbs)	TDS (ppm)	SULPHATE (ppm)	NITRATE (ppm)	FLUORIDE (ppm)
Data points	181	173	136	111	110	98	109
Minimum	4.50	0.10	1.00	97.00	5.00	0.40	0.10
Average	86.66	3.54	37.42	767.39	165.99	7.50	0.79
Maximum	213.40	24.00	103.60	3,297.00	1,020.00	69.00	4.20
Group A	11.05%	5.20%	10.29%	81.08%	70.91%	81.63%	88.07%
Limit	50	>10	10	1000	200	10	1.5
Group B	57.46%	15.61%	62.50%	10.81%	22.73%	7.14%	6.42%
Limit	100	>5	50	1500	600	20	2.0
Group C	30.94%	56.65%	26.47%	6.31%	6.36%	8.16%	3.67%
Limit	200	>0.5	100	2000	1200	40	3.0
Group D	0.55%	22.54%	0.74%	1.80%	0.00%	3.06%	1.83%
Limit	>200	<0.5	>100	>2000	>1200	>40	>3
240 known boreholes within the project area and a 5 km buffer around the area							

Statistical grouping of parameters is for ease of interpretation, except for the grouping used for sulphate, nitrate and fluoride, which follow the Namibian guidelines for the evaluation of drinking-water quality for human consumption, with regard to chemical, physical and bacteriological quality. In this case the groupings has the following meaning:

Group A: Water with an excellent quality Group B: Water with acceptable quality Group C: Water with low health risk
Group D: Water with a high health risk, or water unsuitable for human consumption.

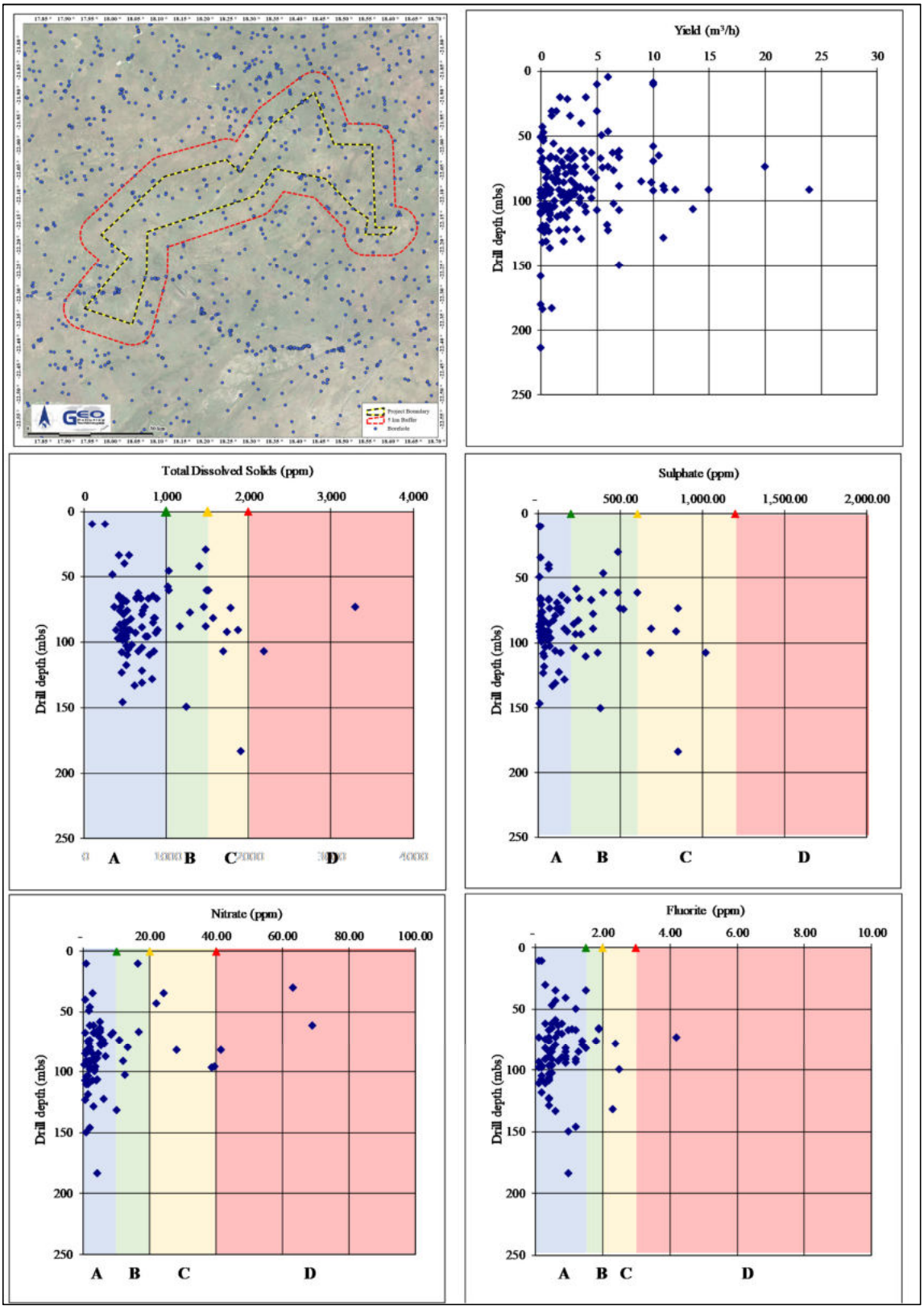

Figure 7-11 Water quality of boreholes in the area

7.7 ECOLOGY

7.7.1 Conservation Status

No national protected areas, communal conservancies or community forests are present in the area. The Black Nossob Freehold Conservancy are however present in the eastern area of the EPL (Figure 7-12). Freehold conservancies serve as voluntary associations of private landowners (farm owners) who collaborate to manage wildlife and natural resources sustainably across their farms. The focus is on conservation, economic development, and ecological connectivity within the conservancy.

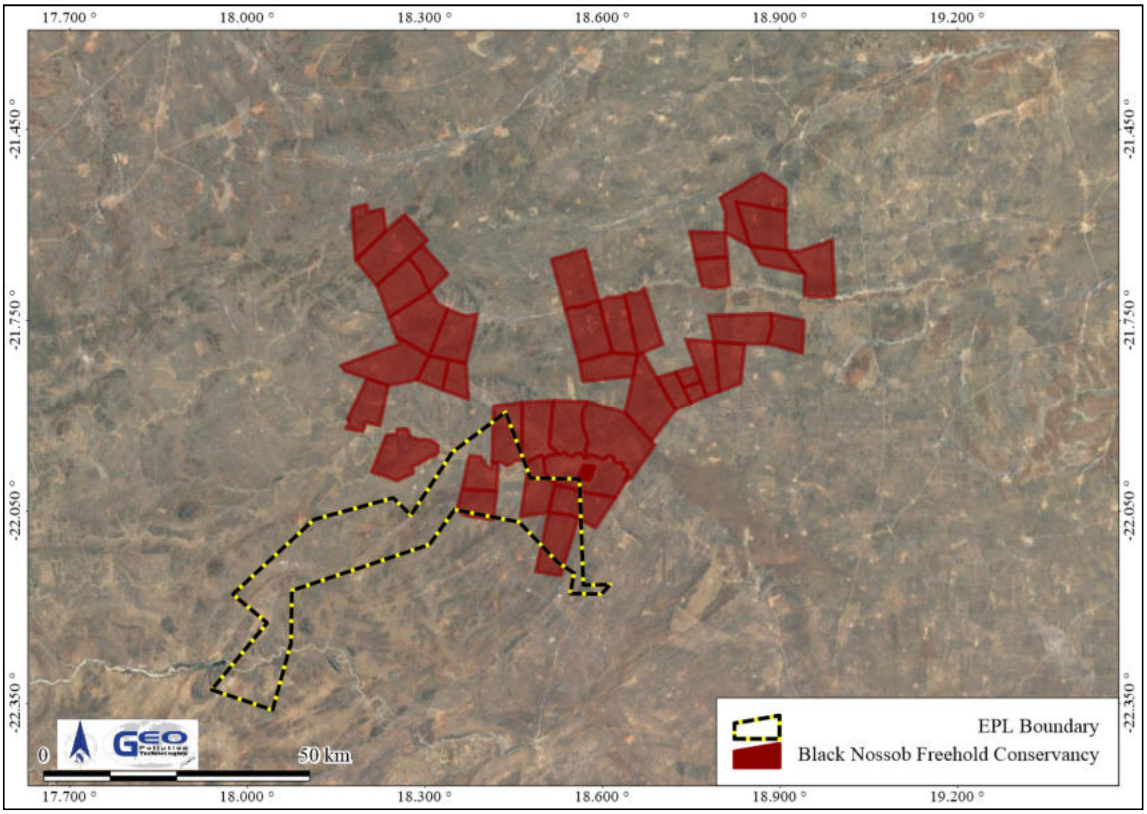

Figure 7-12 Freehold conservancy

7.7.2 Vegetation

The EPL is located in the Acacia savanna sub-biome of the tree and shrub savanna biome with a central Kalahari vegetation type (Atlas of Namibia Team, 2022) (Figure 7-13). The EPL area is mostly located in the highlands 1,500 m floristic group, where taxa occurring above 1,500 mamsl occur.

Vegetation in Namibia is characterised by low species richness, but high endemism, in the west to south, while species richness increase to the northeast, with a decline in the number of endemics. The relatively homogenous physical characteristics of the EPL area (i.e. topography, soils, etc.) resulted in relatively homogenous vegetation. The most abundant trees throughout the EPL include *Catophractes alexandri* (trumpet-thorn), *Dichrostachys cinerea* subsp *africana* (sickle-bush), *Grewia flava* (velvet raisin), *Tarchonanthus camphoratus*, *Ziziphus mucronata* (buffalo-thorn) (Photo 7-5), (camphor bush) (Photo 7-6) and *Acacia* species like *A. erioloba* (camelthorn) (Photo 7-7), *A. karroo* (sweet-thorn), *A. mellifera* subsp *detinens* (blue-thorn acacia) and *A. hebeclada* (candle-pod acacia) (Photo 7-8).

Detailed records on biodiversity surveys in Namibia are fragmented and usually linked to roads and locations frequented by tourists and the general public. The Tree Atlas of Namibia lists tree data for the seven quarter degree squares (QDS) intersected by the EPL, namely QDS 2118CD, 2217BB, 2217BD, 2218AA, 2218AB, 2218AC and 2218BA. A total of 64 trees are

listed as presented in Appendix A. Seven are listed as protected by forestry legislation, namely *A. erioloba* (camel-thorn) (Photo 7-7), *Boscia albitrunca* (Shepherd's tree), *Searsia lancea* (willow rhus), *Erythrina decora* (Namib coral-tree), *Maerua schinzii* (ringwood tree), *Albizia anthelmintica* (Aru) and *Ziziphus mucronata* (buffalo-thorn). Five are invasive to varying degrees. These are *A. mellifera* subsp *detinens, D. cinerea* subsp *africana, Acacia reficiens* subsp *reficiens* (red-thorn), *Catophractes alexandri* (trumpet-thorn or rattlepod) and *Opuntia* spp. Two are aliens to Namibia - *Schinus molle* (pepper tree) and *Opuntia* spp.

Large areas of the EPL have dense stands of invasive species, likely due to overgrazing. On many of the commercial farms, rangeland improvement programmes are in place which entails the removal of such invasive species (Photo 7-8). Grasses were much more prevalent in rangeland improved areas.

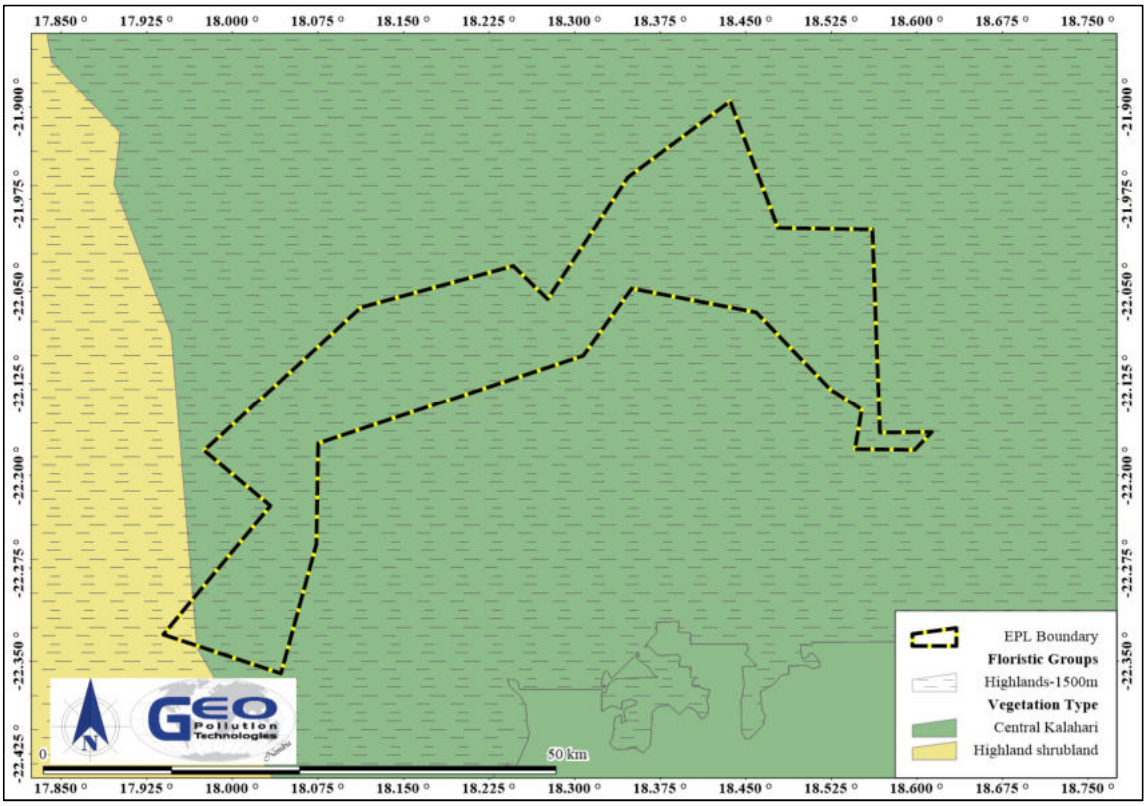

Figure 7-13 Vegetation type and floristic group (Atlas of Namibia Team, 2022)

The 2002 Atlas of Namibia (Atlas of Namibia Team, 2002) indicate total plant species richness for the EPL area as between 100 and 150 species. Lower species richness corresponds with Namibia's trend of lower richness at lower latitudes. Very few endemic plant species will occur in the EPL area. This also corresponds with the overall trend of reduced endemicity towards the east and northeast.

Photo 7-5 ***Ziziphus mucronata***

Photo 7-6 ***Tarchonanthus camphoratus***

Photo 7-7 ***Acacia erioloba***

Photo 7-8 ***Acacia hebeclada***

7.7.3 Wildlife

The 2022 Atlas of Namibia indicates the potential presence of approximately 302 to 357 vertebrate species in the west of the EPL and 262 to 317 species in the eastern side of the EPL (Atlas of Namibia Team, 2022). During the site visit conducted in May 2025, various animals were observed on farms, especially game farms, in the area.

Oryx (*Oryx gazelle*) (Photo 7-9), red hartebeest (*Alcelaphus buselaphus caama*) (Photo 7-10), warthog (*Phacochoerus africanus sundevallii)* (Photo 7-11), Tawny eagle (*Aquila rapax*), pale chanting goshawk (*Melierax canorus*) and Lilac-breasted roller (*Coracias caudatus*) are some of the more visible species observed during the site visit. Kudu (*Tragelaphus strepsiceros*), springbok (*Antidorcas marsupialis*), steenbok (*Raphicerus campestris*), duiker (*Sylvicapra grimmia*), spotted hyena (*Crocuta crocuta*), brown hyena (*Hyaena brunnea*), cheetahs (*Acinonyx jubatus*), leopards (*Panthera pardus*), black-backed jackal (*Canis mesomelas*), *and* chacma baboons (*Papio ursinus*) are some of the larger mammal species that may also be encountered in the area. While game farms will also have species that are not typically encountered, like giraffe (*Giraffa camelopardalis*), waterbuck (*Kobus ellipsiprymnus*) and eland (*Taurotragus oryx*).

Game farms, where the main economic activity is trophy hunting, play an important role in the conservation of wildlife in Namibia. Through careful management of game, trophy hunting generates substantial income which in turn is used for conservation efforts such as anti-poaching patrols, water infrastructure, and habitat restoration.

Photo 7-9 Oryx

Photo 7-10 Red hartebeest

Photo 7-11 Warthog

Photo 7-12 Tawny eagle

Photo 7-13 Pale chanting goshawk

Photo 7-14 Lilac-breasted roller

Implications and Impacts

Some protected tree species occur in the EPL. These, together with bird nests they (and other trees) may contain, may be damaged during exploration activities. Poaching of wildlife is a concern. Aerial surveys may cause unnecessary stress in wildlife and can lead to injuries when wildlife run into fences. Encounters with venomous or dangerous animals (e.g. snakes, leopard, etc.) may pose a danger to the Proponent's staff.

7.8 DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS

The majority of the EPL (99.988%) is located in the Okarukambe Constituency of the Omaheke Region (Figure 7-1). Based on the preliminary results of the 2023 census, the Region has a population of 102,881. The Okarukambe Constituency has a population of 12,271, of which 6,860 are male and 5,411 are female, and a population density of 0.7 people/km^2 (National Planning Commission, 2023). The unemployment rate of the Okarukambe Constituency is 18.4% for persons 15 years and older, which is much lower than the regional rate of 30.3% and the national rate of 36.9%. In the Omaheke Region, agriculture is by far the sector providing the most jobs.

The EPL area generally has a good road network and power supply grid (Figure 7-14). Cellular reception is fragmented. The Otjivero Dam is located in the south-western portion of the EPL with a bulk water supply line from the dam to Omitara and Gobabis. The EPL is located between Windhoek and Gobabis and they offer most goods and services required by residents in the area.

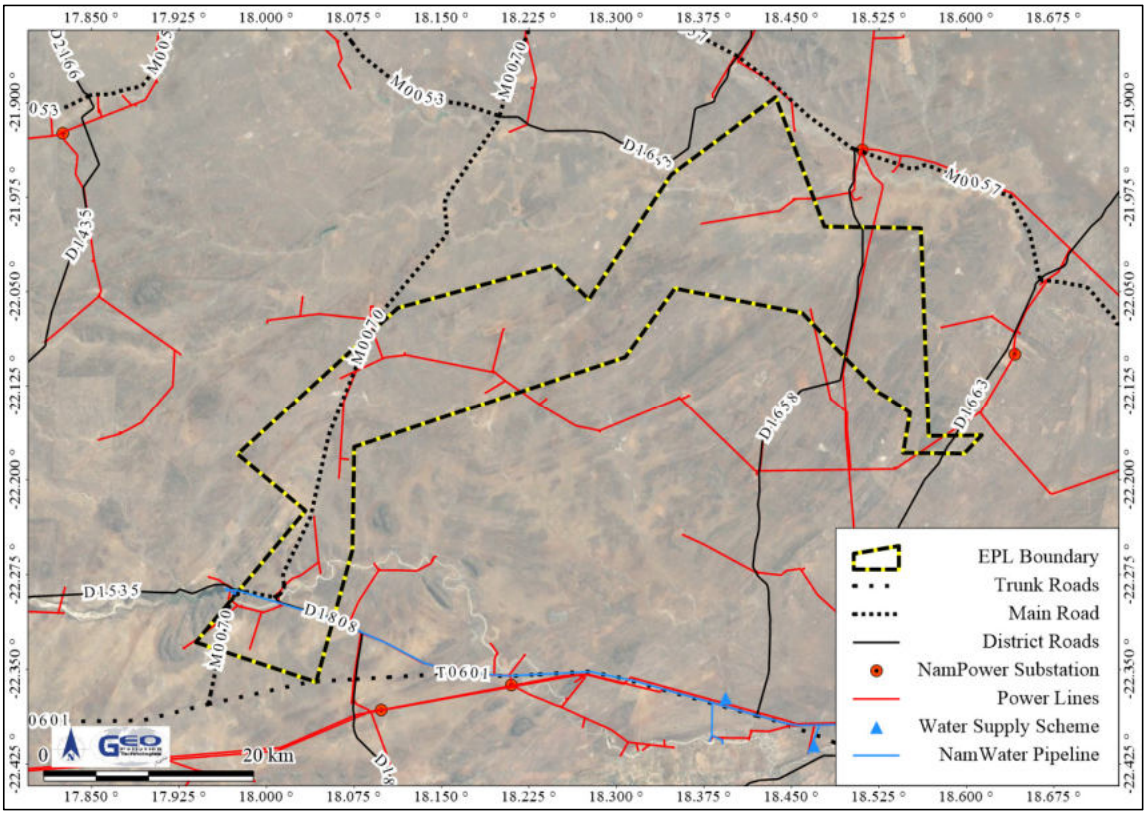

Figure 7-14 Infrastructure

Implications and Impacts

Unemployment and poverty in the Omaheke Region, as in most of Namibia, remains a challenge. Prospecting in the area may provide some economic benefits to the landowners. Especially if someone can provide housing and accommodation to the proponents work force. Conversely, foreign people present on the farms, and the prospects of the eventual possibility of mining on the farms, causes anxiety among farm owners who are afraid of losing their livelihoods (e.g. livestock farming) and/or farms to mining companies. The presence of prospecting teams may result in an

increase in social ills, deviant behaviour and criminal activities in the area. These not necessarily instigated by the team members, but by persons approaching the exploration team for illicit activities or posing as members of the exploration team.

7.9 CULTURE, HERITAGE AND ARCHAEOLOGY

The 2022 Atlas of Namibia (Atlas of Namibia Team, 2022) produced maps indicating the potential densities of archaeological sites in Namibia, by extrapolating the available data for all recorded archaeological sites. These maps were produced for archaeological sites dating back to the last 2,000 years (Figure 7-15), between 2,000 and 10,000 years ago (Figure 7-16), and 10,000 to 1.8 million years ago (Figure 7-17). Based on the extrapolated data, the EPL is located in an area where there could be a relatively low density of archaeological sites for older time periods. However, based on the data provided in the 2022 Atlas of Namibia, no declared national heritage monuments or sites are present within or near the EPL (Figure 7-18). Similarly, no known rock art are present within the EPL. A heritage assessment for the EPL area was commissioned and will be submitted to MEFT once finalised.

Some buildings or structures may be older than 50 years, which, under the National Heritage Act, may hold archaeological, architectural, cultural, historical, scientific or social significance and may be considered for inclusion in the National Heritage Register. No buildings or structures observed during the site visit had any unique, historic characteristics with obvious, inherent heritage value. The historic presence of San in the Kalahari, increase the possibility that some artefacts of archaeological significance may be present in the EPL area.

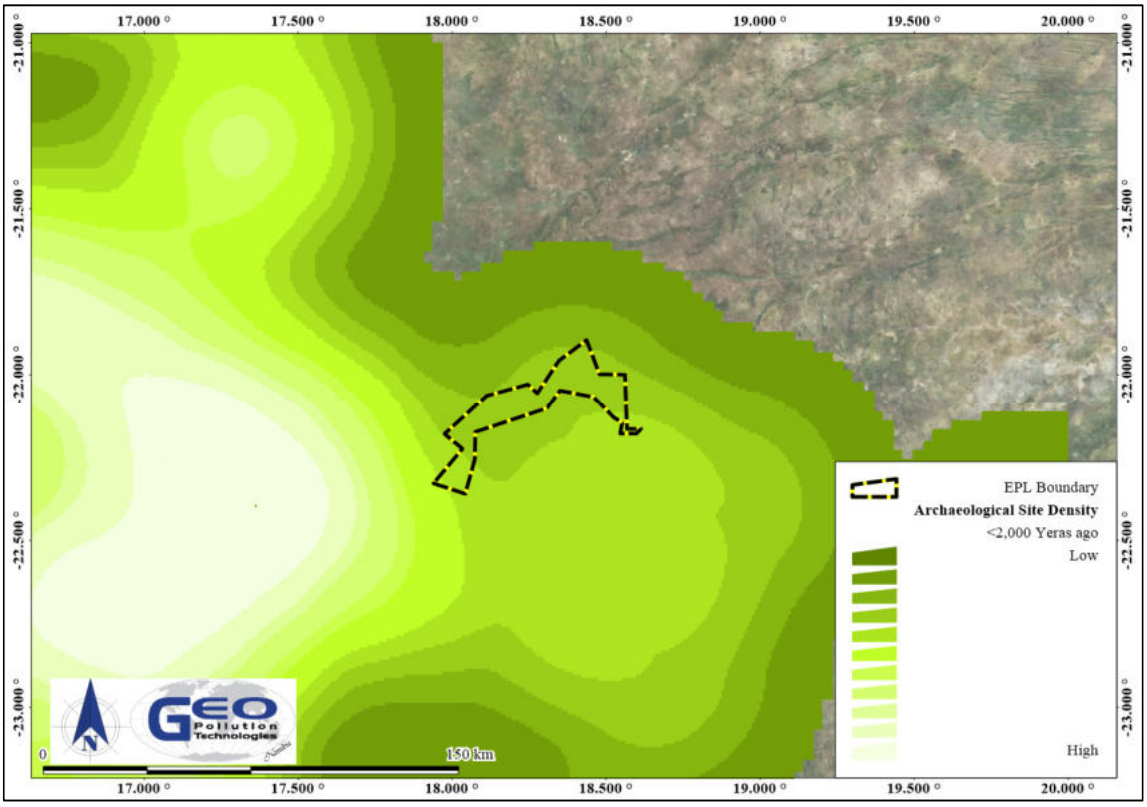

Figure 7-15 Known archaeological site densities dating to the last 2,000 years (Atlas of Namibia Team, 2022)

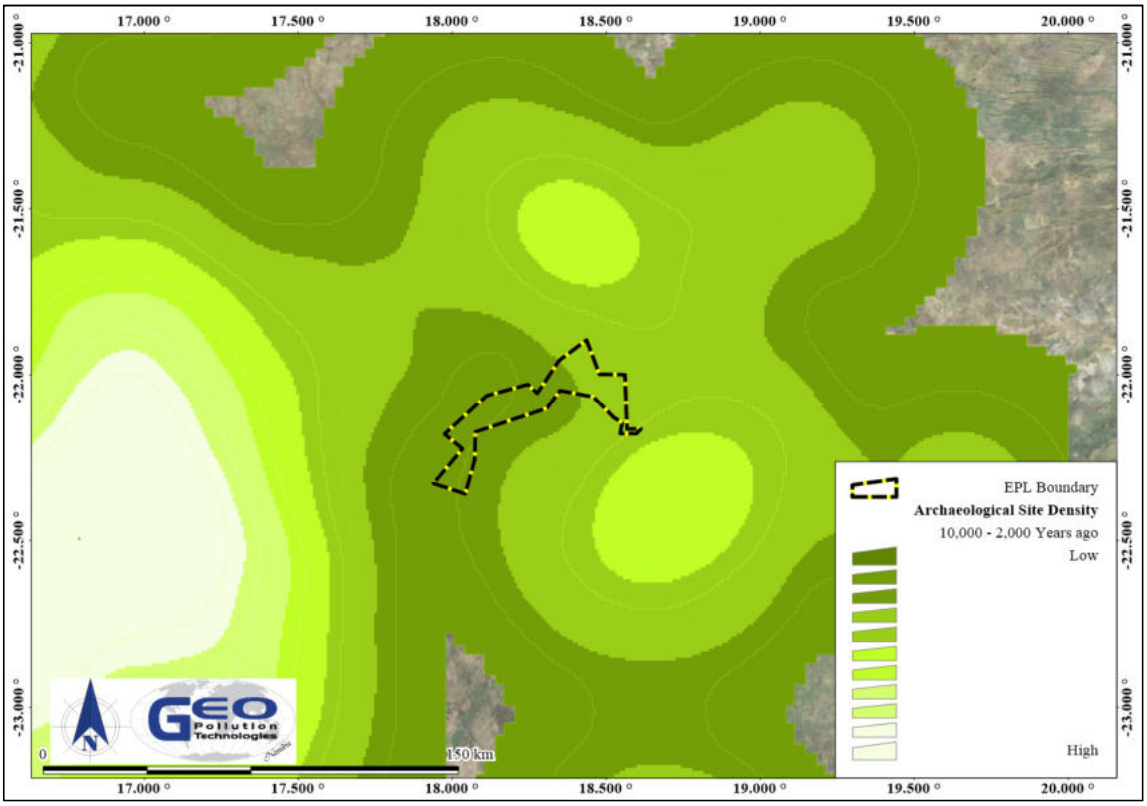

Figure 7-16 Known archaeological site densities dating to between 2,000 and 10,000 years ago (Atlas of Namibia Team, 2022)

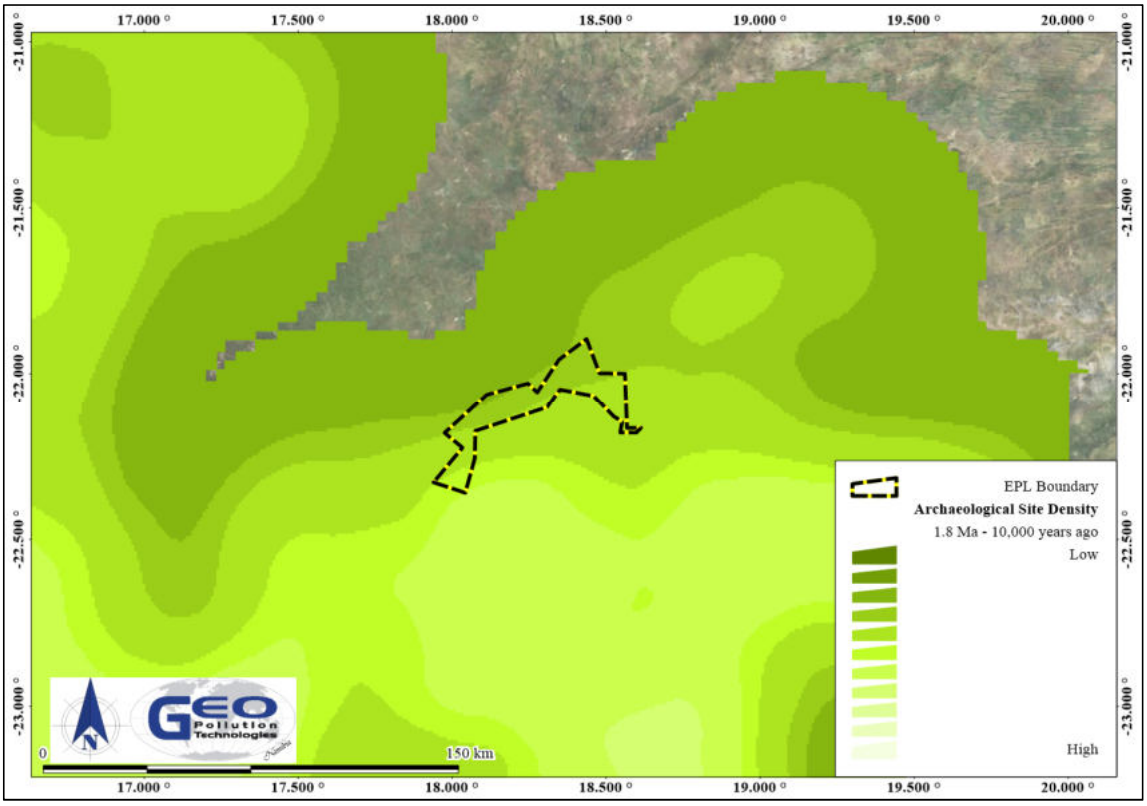

Figure 7-17 Known archaeological site densities dating to between 10,000 and 1.8 million years ago (Atlas of Namibia Team, 2022)

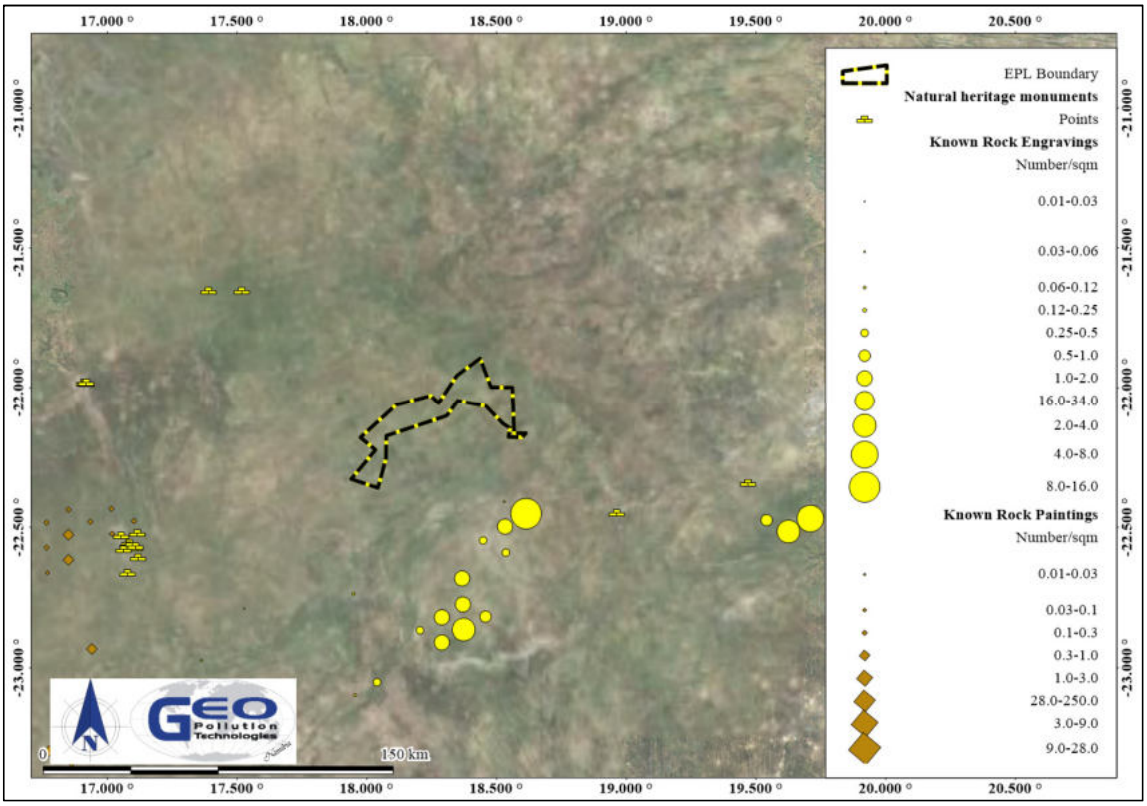

Figure 7-18 Declared national heritage monuments, density of known rock paintings and density of known rock engravings in relation to the EPL (Atlas of Namibia Team, 2022)

Implications and Impacts

Although no archaeologically significant sites such as rock art, signs of early human habitation or unmarked graves were found during the site visit, and land owners also did not mention the presence of any of these, there still remains a chance that such artefacts may be present within the EPL.

8 PUBLIC CONSULTATION

Consultation with the public forms an integral component of an environmental assessment investigation and enables interested and affected parties (IAPs) e.g. neighbouring landowners, local authorities, environmental groups, civic associations and communities, to comment on the potential environmental impacts associated with project and to identify additional issues which they feel should be addressed in the environmental assessment.

Public participation for such large project areas, overlapping many parcels of land with different land owners and/or inhabitants, can be challenging. Mainly because it is not easy to identify all land owners and get the contact details of those who are successfully identified.

To reach the target community for EPL 10044, various methods and processes were followed. The contact details of landowners and other identified IAPs were obtained where available and were contacted via telephone. The project was discussed with the various IAPs over the phone and e-mail addresses obtained for future communication. One-on-one meetings were scheduled with landowners who indicated that they would like to meet in person during the scoping assessment's site visit. Public participation notices were advertised for two weeks in two national newspapers, namely the New Era and The Republikein, on the 10th and 17th of March 2025. Site notices were placed on the C29, D1808 and D1658 roads. Notices were also hand delivered to various Ministries and the Omaheke Regional Council.

See Appendix B for proof of the public participation processes and minutes of the meetings. The main concerns raised during the public consultation phase related to the co-existence of farming, exploration and ultimately mining on the same land (i.e. a farm) and aspects such as poaching, infrastructure damage, theft, pollution, etc.

9 IMPACT ASSESSMENT AND MANGEMENT OF IMPACTS

The purpose of this section is to identify and assess the most pertinent environmental impacts that are expected from the exploration activities of the Proponent. An EMP outlining preventative and mitigating measures, based on these identified impacts, is also incorporated into this section. Where impacts are positive in nature, enhancement measures are proposed to maximise the potential benefits.

For each impact an environmental classification was determined based on an adapted version of the Rapid Impact Assessment Method (Pastakia, 1998). Impacts are assessed according to the following categories: Importance of condition (A1); Magnitude of Change (A2); Permanence (B1); Reversibility (B2); and Cumulative Nature (B3) (see Table 9-1). Define reversibility and permanence Ranking formulas are then calculated as follow:

Environmental Classification = A1 x A2 x (B1 + B2 + B3).

The environmental classification of impacts is provided in Table 9-2.

The probability ranking refers to the probability that a specific impact will happen following a risk event. These can be improbable (low likelihood); probable (distinct possibility); highly probable (most likely); and definite (impact will occur regardless of prevention measures).

Table 9-1 Assessment criteria

Criteria	Score
Importance of condition (A1) – assessed against the spatial boundaries of human interest it will affect	
Importance to national/international interest	4
Important to regional/national interest	3
Important to areas immediately outside the local condition	2
Important only to the local condition	1
No importance	0
Magnitude of change/effect (A2) – measure of scale in terms of benefit / disbenefit of an impact or condition	
Major positive benefit	3
Significant improvement in status quo	2
Improvement in status quo	1
No change in status quo	0
Negative change in status quo	-1
Significant negative disbenefit or change	-2
Major disbenefit or change	-3
Permanence (B1) – defines whether the condition is permanent or temporary	
No change/Not applicable	1
Temporary	2
Permanent	3
Reversibility (B2) – defines whether the condition can be changed and is a measure of the control over the condition	
No change/Not applicable	1
Reversible	2
Irreversible	3

Cumulative (B3) – reflects whether the effect will be a single direct impact or will include cumulative impacts over time, or synergistic effect with other conditions. It is a means of judging the sustainability of the condition – not to be confused with the permanence criterion.	
Light or No Cumulative Character/Not applicable	1
Moderate Cumulative Character	2
Strong Cumulative Character	3

Table 9-2 Environmental classification (Pastakia 1998)

Environmental Classification	Class Value	Description of Class
72 to 108	5	Extremely positive impact
36 to 71	4	Significantly positive impact
19 to 35	3	Moderately positive impact
10 to 18	2	Less positive impact
1 to 9	1	Reduced positive impact
0	-0	No alteration
-1 to -9	-1	Reduced negative impact
-10 to -18	-2	Less negative impact
-19 to -35	-3	Moderately negative impact
-36 to -71	-4	Significantly negative impact
-72 to -108	-5	Extremely Negative Impact

9.1 RISK ASSESSMENT AND ENVIRONMENTAL MANAGEMENT PLAN

An EMP provides management options to ensure impacts of an activity are minimised. It is thus a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures may be included where necessary. The environmental management measures are provided in the tables and descriptions below. These management measures should be adhered to during the various phases of exploration. This section of the report can act as a stand-alone document. All personnel taking part in exploration should be made aware of the contents of this section, so as to plan and execute exploration in an environmentally sound manner.

The objectives of the EMP are:

- to include all possible activities of exploration;
- to prescribe the best practicable control methods to lessen the environmental impacts associated with exploration;
- to monitor and audit the performance of personnel in applying such controls; and
- to ensure that appropriate environmental training is provided to responsible personnel.

Various potential and definite impacts related to the proposed exploration activities have been identified. The majority of these impacts can be prevented or mitigated. The impacts, risk rating of impacts, as well as prevention and mitigation measures are listed below.

As depicted in the tables below, impacts related to the exploration phase are expected to mostly be of low to medium significance and can mostly be mitigated to have a low significance or a low probability to occur. The extent of impacts are mostly site specific to local and are not of a permanent nature.

9.1.1 Planning Phase

Planning is not only limited to before the exploration phase is entered, but is ongoing throughout the validity of the awarded EPL. When planning to conduct exploration, it is the responsibility of Proponent to ensure all personnel and contractors are and remain compliant with all legal requirements and the provisions of the EMP. This includes ensuring that all required management measures are in place prior to and during exploration, to ensure potential impacts and risks are prevented or minimised. The management structure of the Proponent is presented in Figure 9-1.

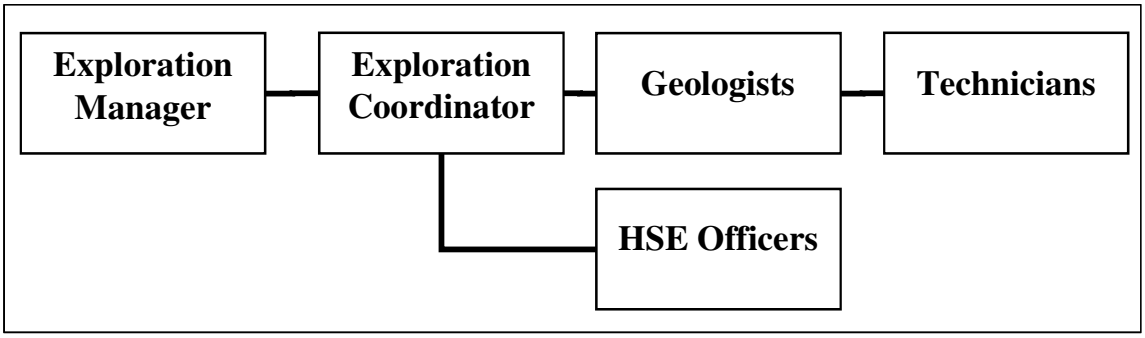

Figure 9-1 VMN organogram

The following actions are recommended for the planning phase and should continue during various other phases of the project:

9.1.1.1 Delegation of Responsibilities

- Make provisions to have a health, safety and environmental coordinator or similar to implement the EMP and oversee occupational health and safety as well as general environmental related compliance.
- Delegate EMP responsibilities to relevant personnel and contractors.

9.1.1.2 Risk Management and Emergency Response Preparedness

- Have relevant standard operating procedures and emergency response plans, equipment and personnel on site to prevent and deal with potential emergencies and incidents:
- Examples include health, safety and environment (HSE) manuals, site induction protocols, material safety data sheets, firefighting and evacuation plans and equipment, spill response plans, first aid training and first aid kits, etc.

9.1.1.3 Legal Compliance

- Compile an internal legal register outlining all required authorisations, permits and licences required to execute exploration activities.
- Comply with the various applicable acts and their respective regulations, for example pertaining to labour, income and other taxes and levies, work permits, etc.
- Ensure all necessary permits and authorisations from the various ministries, local authorities and any other bodies that govern exploration activities are in place and remains valid. These include the ECC, the EPL, drilling permits, permits for removal of protected trees (if required), exemption permits for storage of fuel, authorisations for aerial surveys, if any (helicopter, drone or aeroplane), etc.
- Apply for renewal of the ECC prior to expiry.

9.1.1.4 Surface Access Agreements

- Enter into agreements with the various land owners affected by the EPL and exploration activities. Such agreements should clearly stipulate the responsibilities of all parties involved, including restrictions pertaining to entry, movement and activities on the land, expectations of the land owner regarding rehabilitation once exploration activities cease, etc.

9.1.1.5 Employment and Contractor Appointments

- Ensure all appointed employees and contractors enter into an agreement with the Proponent, which among others include contractual adherence to the EMP. Ensure the contents of the EMP are understood by the employees contractors, sub-contractors and all personnel present or who will be present on explorations sites. This may require environmental training pertaining to the “value of nature” (why we need to protect the environment), explanation of various terminology, monitoring requirements, consequences of non-compliance, etc.

9.1.1.6 Rehabilitation and Pollution Clean-up

- If not already established, establish and maintain a fund/insurance for rehabilitation of the exploration sites, or for unforeseen events where environmental pollution occur which requires clean-up and/or remediation.

9.1.1.7 Community Liaison

- Appoint a community liaison officer and devise a community liaison strategy. Communicate his/her contact details, and the procedures for filing of complaints or providing feedback/input, to the affected land owners and other relevant stakeholders.
- Maintain a complaints register which details, among others, the date the complaint is received, the name and contact details of the person filing the complaint, the nature of the complaint, action taken to address and prevent future incidents of a similar nature, a copy of the feedback provided to the person filing the complaint.

9.1.1.8 Monitoring and Reporting

- Maintain an incidents register which detail, among others, the date the incident occurred, the names and contact details of persons involved in the incident, the nature of the incident, and action taken to address and prevent future incidents of a similar nature.
- Establish and / or maintain an environmental reporting system to report on environmental management procedures and incidents as outlined in the EMP.
- Submit environmental monitoring reports to the MEFT in compliance with the conditions linked to the ECC.

9.1.3 Employment

Appointment of consultants already realises during the planning phase. This include those responsible for permitting. During exploration, some contractors may be appointed to conduct specialised tasks. Local consultants, contractors and their employees, are thus supported, and their livelihoods sustained. Some aspects may require expertise not locally available, in which case foreign consultants or contractors may be used.

The Proponent appoints unskilled, semi-skilled and specialist employees to perform tasks related to exploration. This range from office administration to the highly specialised activities involved with in-field geological surveys and drilling. Employment are sourced locally, however specialised skills may not be locally available and may be sourced from outside of Namibia.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Enhancement Measures									
Planning, Exploration and Site Decommissioning	Permanent employment opportunities and periodic appointment of consultants and third party contractors without prioritising Namibian citizens	3	1	2	2	1	15	2	Definite
With Enhancement Measures									
Planning, Exploration and Site Decommissioning	Prioritising Namibian citizens for permanent employment opportunities and periodic appointment of consultants and third party contractors	3	2	2	2	1	30	3	Definite

Desired outcome: To maximise the appointment of Namibian consultants, contractors and employees to contribute to a reduction in overall unemployment.

Actions

Enhancement:

- Employ local Namibians as far as practically possible and where requested by land owners, employ existing farm workers for unskilled temporary jobs.
- Appointment of foreign employees or contractors must be in line with the requirements of the Ministry of Home Affairs, Immigration, Safety and Security.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Labour Act
- Immigration Control Act
- Bi-annual summary report based on employee records with employee contracts, work permits, etc. on file.

9.1.3 Skills, Technology and Development

Development of people and technology are key to economic development. Exploration for mineral resources requires a workforce that ranges from highly specialised to general workers. Advanced exploration technologies are often used and training is provided to a portion of the workforce to be able to use these technologies and to perform certain tasks according to the required standards. Skills are periodically transferred to an unskilled workforce for general tasks. During normal exploration and related activities, employees will increase their work experience while some individuals may be identified for promotion and additional skills development and training.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Enhancement Measures									
Planning, Exploration and Site Decommissioning	Training and education, transfer of skills and technological development	3	1	2	2	1	15	2	Probable
With Enhancement Measures									
Planning, Exploration and Site Decommissioning	Training and education, transfer of skills and technological development	3	2	2	2	1	30	3	Definite

Desired Outcome: To see an increase in skills of local Namibians, as well as development and technological advancements in the mining industry and local community.

Actions

Enhancement:

- If the skills and technology exist locally, contractors and employees must be sourced from Namibia. Deviations from this practice is justified where local or Namibian options are not available.
- Skills development and improvement programs to be made available to Namibians as identified during employee performance assessments. This increases their chances of being successful in job applications if no longer employed by the Proponent.
- Employees to be informed about parameters and requirements for references upon employment. The Proponent to issue reference letters or testimonials to employees, during their period of employment, to ensure they have proof of work experience and competence should they leave the company.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Record should be kept of any formal or informal training provided.
- Ensure that all training is certified or managerial reference provided (proof provided to the employees) inclusive of training attendance, completion and implementation.
- Bi-annual summary report based on records kept.

9.14 Contribution to the Economy

Mining and mining related activities attract foreign investment. The Proponent's exploration activities in Namibia have and will continue to generate revenue which is paid to the national treasury. Various consultants, contractors and employees are remunerated and various taxes, levies and fees are paid. This stimulates Namibia's economic development and promotes additional investments and business development.

At local scale, businesses in the area can benefit from the presence of the exploration team.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Enhancement Measures									
Planning, Exploration and Site Decommissioning	Contribution to the Economy	3	1	2	2	1	15	2	Probable
With Enhancement Measures									
Planning, Exploration and Site Decommissioning	Contribution to the Economy	3	2	2	2	1	30	3	Definite

Desired Outcome: Contribution to the national treasury and economy

Actions

Enhancement:

- Procurement and maintenance of vehicles and machinery from the Namibian business sector.
- The Proponent must employ local Namibians and contractors where possible.
- Where available, engage with local businesses for the provision of goods and services.
- Adherence to all Namibian laws relating to the payment of taxes, levies, etc.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Bi-annual summary report based on employee and contractor records, procurement of goods and services, etc. on file.

9.1.5 Ideals and Aspirations for the Future

During the environmental assessment, pubic consultation was conducted with land owners and interested and or affected parties. Information shared with some of the parties resulted in a change in their aspirations for the future. This related to the possibility of additional revenue streams that may result from exploration activities and potentially mining. Such revenue streams included the provision of services to the exploration team, e.g. accommodation, or being employed by the Proponent. The possibility of exploration in the area also resulted in a negative impact on the ideals and aspirations of the land owners where they felt exploration, and possibly future mining, may negatively impact their livelihoods by reducing their farmable land.

Ideals and aspirations of employees are also considered. Poor communication between management and employees may lead to uncertainty in with regard to job security and options for promotion.

Project Activity/Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Mitigation Measures									
Planning, Exploration and Site Decommissioning	Negative impact on society's ideals and aspirations for the future	2	-2	2	2	1	-20	-3	Definite
After Mitigation Measures									
Planning, Exploration and Site Decommissioning	Positive impact on society's ideals and aspirations for the future	2	2	2	2	1	20	3	Highly Probable

Desired Outcome: Continued sharing of accurate and easily understandable information, planned activities, project progress and opportunities with land owners, IAPs and government agencies. Maintaining an open door policy with land owners and IAPs.

Actions

Enhancement:

- Information sharing about the proposed project to explain in laymen's terms all proposed activities, timelines, potential impacts, potential benefits (opportunities), etc. The public consultation phase of the environmental assessment process was the first step in information sharing.
- Major changes in proposed exploration activities should be made available to land owners, government agencies and interested and affected parties.
- Open communication regarding future exploration activities, opportunities and employment with both land owners and employees.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Up to date stakeholder database
- Records kept of all information shared with authorities, neighbours and employees.

9.1.6 Demographic Profile and Community Health

The scale of the exploration project is limited and it is not expected to create a change in the demographic profile of the nearby local communities. Where possible, existing labour, already employed by the Proponent will be used or new labourers will be sourced from a nearby town, or possibly from the land owners. Community health may be exposed to factors such as communicable disease like HIV/AIDS and tuberculosis (TB) and social ills or deviant behaviour like alcoholism/drug abuse, associated with increased spending power of the labour force. Similarly, workers from the exploration team may visit farm labourer compounds, and vice versa, and this may further expose both groups to the same social ills and diseases. Incidences of theft may occur and this may also be when criminals pose as employees of the exploration team present in the EPL area.

Positive impacts will relate to employees and contractors' increased economic resilience and improved livelihoods.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Communicable disease, alcoholism/drug abuse, deviant behaviour, criminal activities	2	-2	2	2	1	-20	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Communicable disease, alcoholism/drug abuse, deviant behaviour, criminal activities	2	-1	2	2	1	-10	-2	Improbable

Desired Outcome: To prevent the in-migration and growth in informal settlements and to prevent the spread of communicable diseases and prevent / discourage socially deviant behaviour and criminal activities.

Actions:

Prevention:

- Thorough background checks and testimonials when appointing new employees.
- Provide educational programmes / information sessions for employees on various topics of health, social behaviour, etc., including communicable diseases, financial management and general upliftment of employees' social status.
- Clearly stipulate restricted activities when working within the EPL. Include any such activities stipulated in surface access agreements.
- Provide time schedules, names and vehicle registration numbers to land owners well in advance (and any other information as per the surface access agreement). Communicate any changes to land owners.
- All employees to wear easily distinguishable uniforms/clothing, with name tags that can be checked against the provided list of employees who will be present on the land.
- Inform land owners of each arrival onto and each departure from the land.
- No movement out of areas pre-arranged with the landowner.
- In the event that the exploration team must make use of a temporary camp for accommodation on any privately owned land, adhere to the following:
  - Provide adequate sanitary and ablution facilities.
  - No unauthorised visitors to be allowed at exploration sites and camps.
  - Employees to stay at the camp and authorised areas and no wandering outside of these or visits to nearby workers' compounds.
  - All waste to be contained and removed from site to ensure hygienic conditions.

- Where contractors are required, ensure they are reputable and will strictly implement and follow the same measures as stipulated for the Proponent's team.

Mitigation:

- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Surface access agreements
- Company policies, procedures and rules
- For temporary camps, regularly completed inspection sheets, for all areas which may present environmental health risks, must be kept on file.
- Bi-annual summary report based on educational programmes and training conducted.

9.1.7 Health and Safety

Various activities associated with exploration are reliant on physical human labour, in the outdoors, and the operation of machinery. Therefore health and safety risks exist. Such risks include exposure to environmental elements extreme heat or cold, sunstroke, dehydration, trips and falls, vehicle accidents, getting caught in moving parts of machinery, cuts, exposure to hazardous chemicals (e.g. hydrocarbons) and encounters with wild, potentially dangerous, animals.

The EPL is remote and the nearest proper medical facilities are located in Windhoek and Gobabis, respectively being about 90 and 50 km away from the most western and most eastern parts of the EPL.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Physical injury or exposure to elements	1	-3	2	2	1	-15	-2	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Physical injury or exposure to elements	1	-2	2	2	1	-10	-2	Improbable

Desired Outcome: To prevent injury and health impacts

Actions

Prevention:

- Implement and maintain an integrated health and safety management system.
- All health and safety standards specified in the Labour Act should be complied with.
- Ensure that all personnel receive adequate training on operation of equipment / handling of hazardous substances (mainly hydrocarbons – fuel, hydraulic fluid, etc.) and all drivers are appropriately licenced.
- All employees and visitors to the exploration areas must receive appropriate induction prior entry.
- Provide all employees with required and adequate personal protective equipment (PPE) and training in the proficient use thereof. This should include clothing and sunscreen to prevent sunburn or heatstroke.
- Ensure sufficient potable water is available to all workers at all times and remind employees to stay hydrated, especially in warm summer months.
- To prevent unauthorised entry, temporary camp and drill sites must be fenced off.
- Place and securely stow all heavy equipment (e.g. drill rods and casing) to prevent objects toppling over or falling on employees. Demarcate potentially dangerous areas like the drilling fluid sumps.
- No alcohol or recreational drugs should be allowed on site and no personnel should operate equipment under the influence of any drugs, including medicine that cause drowsiness and impaired judgement.
- Maintain all equipment and vehicles in good working order to minimise the risk of accidents (e.g. replacing of worn vehicle tyres, replacing damaged drill rods, etc.)
- Staff should be educated / trained on human wildlife conflict management and be informed not to approach wild animals and to be vigilant for, and not to confront (attempt to kill or catch), snakes or other potentially venomous / dangerous animals.

- Regular checks for ticks and wearing of repellents and clothing to prevent them from attaching.

Mitigation:

- Selected personnel should be trained in first aid and a first aid kit must be available on site. This should include for example snake identification and handling of snake bites.
- The contact details of all emergency services must be readily available and a satellite phone must be available if areas with no cellular reception is entered.
- In case of any injury or illness, first aid should be applied and the employee transported to a medical facility if required.
- For serious injuries, emergency services should be contacted for evacuation to the nearest emergency facility.
- All personnel with known medical conditions must keep their own medicine nearby at all times. This includes treatment for severe allergies to for example bee stings.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Any health and safety incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when training were conducted and when safety equipment and structures were inspected and maintained

9.1.6 Security

Security risks will be related to unauthorised entry into temporary exploration camps, theft and sabotage. Similarly, the presence of foreign workers in the area may expose the land owners to security issues such as theft (e.g. poaching, stock theft). Criminals may take the opportunity to pose as exploration team workers in order to access the areas.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Deviant behaviour and criminal activities	2	-2	2	2	1	-20	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Deviant behaviour and criminal activities	2	-1	2	2	1	-10	-2	Improbable

Desired Outcome: To prevent deviant and criminal behaviour such as theft.

Actions

Prevention:

- Thorough background checks and testimonials when appointing new employees.
- Clearly stipulate restricted activities when working within the EPL. Include any such activities stipulated in surface access agreements.
- Provide time schedules, names and vehicle registration numbers to land owners well in advance (and any other information as per the surface access agreement). Communicate any changes to land owners.
- All employees to wear easily distinguishable uniforms/clothing, with name tags that can be checked against the provided list of employees who will be present on the land.
- Inform land owners of each arrival onto and each departure from the land.
- No movement out of areas pre-arranged with the landowner.
- Prior to entering an EPL, confirm with the land owner which gates should be left open and which should be closed.
- Where contractors are required, ensure they are reputable and will strictly implement and follow the same measures as stipulated for the Proponent's team.

Mitigation:

- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.
- Vehicles accessing farms could be fitted with trackers and dash cams to allow the Proponent to investigate any complaints made by landowners about unauthorised movement and incidents on their land.
- Report any suspected "out of the ordinary" sightings such as dead animals (suspected poaching), open gates, suspicious persons, etc. to the land owner.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Surface access agreement
- Any incidents must be recorded with action taken to prevent future occurrences.
- A bi-annual report should be compiled of all incidents reported and action taken.

9.1.3 Vehicle Movement

Exploration activities occur on farmland, thus traffic impacts on public roads will be limited to the occasional movement of vehicles to and from the EPL when exploration is performed. This can include slow moving drill rigs. The impact on public roads are expected to be minor.

Although only a few vehicles will access private roads in the EPL area, such as on privately owned farms, it may constitute a significant increase in traffic compared to the status quo. Potential impacts include dust, noise, running over or collisions with wildlife and livestock, stressed wildlife, and damage to roads, especially when it rains and road surfaces are wet.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Traffic impacts during delivery of large equipment and building materials	2	-2	2	2	2	-24	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Traffic impacts during delivery of large equipment and building materials	2	-1	3	2	2	-14	-2	Improbable

Desired Outcome: Minimum impact on traffic on public roads, no transport or traffic related incidents, impacts and disturbances on privately owned land/roads

Actions

Prevention:

- All drivers of vehicles must have valid drivers' licences appropriate for the vehicle driven and be trained in off-road driving.
- All vehicles to be roadworthy and appropriately licensed.
- If significant traffic impacts are expected on public roads, possibly as a result of slow moving drill rigs, traffic management should be performed.
- Implement speed limits on farm roads to minimise dust and noise and to prevent running over or collisions with wildlife or livestock. For roads near residences or livestock enclosures, and for very dusty roads, speed can further be reduced.
- All drivers should be vigilant for any wildlife near or in roads to prevent running over or collisions with wildlife and livestock.
- Maintain all vehicles' in good mechanical condition to ensure they do not produce excessive noise.
- For sandy areas, engage four-wheel drive and reduce tyre pressure to prevent unnecessary wheel spin and damage and corrugation of roads.

Mitigation:

- Repair any damaged roads.
- Report any collisions with livestock or wildlife to the land owner.
- Vehicles accessing farms could be fitted with trackers and dash cams to allow the Proponent to investigate any complaints made by landowners about unauthorised movement and incidents on their land.
- Disciplinary action for non-compliance must be communicated to all employees and contractors and implemented when incidents occur.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Any complaints received regarding vehicle movement should be recorded together with action taken to prevent impacts from repeating itself.
- A bi-annual report should be compiled of all incidents reported, complaints received, and action taken

9.1.10 Noise

Noise related to exploration activities is mainly limited to vehicle movement, aerial surveys and exploration drilling. Helicopter, aeroplane or drone technology used for aerial photography or geophysical surveys, will introduce noise unfamiliar to wildlife and livestock, especially at low altitude flying.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Noise generated from the exploration activities – nuisance and stressed animals	2	-2	2	2	1	-20	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Noise generated from the exploration activities – nuisance and stressed animals	2	-1	2	2	1	-10	-2	Improbable

Desired Outcome: To prevent any hearing loss among employees and not to be a nuisance or cause stress in wildlife and livestock.

Actions

Prevention:

- Follow Health and Safety Regulations of the Labour Act on maximum noise levels to prevent hearing impairment of employees, specifically if drilling is conducted.
- All vehicles and machinery must be regularly serviced to ensure minimal noise production. This include fitting noise dampers on for example compressors used for reverse circulation drilling.
- Exploration activities should only be conducted in daytime, during weekdays, unless otherwise arranged with the land owner.
- If helicopters, drones or aeroplanes are used for aerial surveys, it should be performed at times agreed upon as per surface access agreement with the land owner.
- Helicopter, drone or aeroplane surveys must be performed for the minimum time possible, and as high above the ground as possible, while still ensuring good quality data.
- Noise dampers to be fitted on machines where suitable and alternative signalling adopted where possible.
- For vehicle noise also refer to section 9.1.9.

Mitigation

- Personnel working in noisy environments must be issued with hearing protectors, specifically if drilling is conducted.
- Where helicopters, aeroplanes or drones cause distress in animals, operations should cease until they have moved away, before it can continue.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Health and Safety Regulations of the Labour Act, Civil Aviation Act
- Surface access agreement.
- Maintain a complaints register.
- Bi-annual report on complaints and actions taken to address complaints and prevent future occurrences

9.1.11 Fire

Fires outside of designated areas and discarded cigarettes can cause veld fires which can quickly spread and get out of control. Similarly, machinery can ignite dry vegetation if sufficient heat (e.g. exhaust pipes) or sparks are produced. Fuels stored and used for exploration activities may be flammable. Veld fires originating elsewhere (e.g. lightning) can pose a threat to the exploration teams.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Fire risks	2	-3	2	2	1	-30	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Fire risks	2	-2	2	2	1	-20	-3	Improbable

Desired Outcome: To prevent fires causing property damage, loss in vegetation, possible injury caused by uncontrolled fires.

Actions:

Prevention:

- Prepare a holistic fire protection and prevention plan. This plan must include an emergency response plan and a firefighting plan.
- Personnel training (safe operational procedures, firefighting, fire prevention and responsible housekeeping practices).
- All vehicles to be fitted with fire extinguishers and have equipment to specifically fight veld fires available.
- For drilling sites and if temporary camps are used:
  - Maintain regular vehicle and machinery mechanical and electrical inspections and maintenance.
  - Ensure all flammable chemicals are stored according to material safety data sheet (MSDS) and SANS instructions and all spills or leaks are cleaned up immediately.
  - Have serviced firefighting equipment within easy reach, including those used to fight veld fires.
  - Fire used for purposes such as cooking must only be allowed within designated areas far removed from any flammable material such as dry vegetation.

Mitigation:

- Implement the fire protection and firefighting plan in the event of a fire.
- Quick response time by trained staff will limit the spread and impact of a fire.
- Communication methods (e.g. satellite phones where cellular phone reception is limited) must be available at all times for rapid communication with the land owner and surrounding farmers to immediately be able to notify them of a fire. A rapid response to a veld fire is crucial in bringing it under control and extinguishing it as soon as possible.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A register of all incidents must be maintained on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.
- A bi-annual report should be compiled of all incidents reported. The report should contain dates when fire drills were conducted and when fire equipment was tested and training given

9.1.12 Visual

Activities that may have a visual impact are exploratory drilling, the associated roads leading to drill sites, and possible erosion where vegetation is cleared. Rehabilitated drill sites and cleared areas takes time to recover to such an extent that it is no longer visible, and are prone to erosion. Newly drilled boreholes are distinctly visible due to the vegetation clearing and waste rock usually associated with such sites. Borehole casing protruding from the ground also has a visual impact. Numerous drill sites will thus alter the landscape character. In addition newly drilled sites are often uniquely visible from the air and on open source satellite imagery due to the presence of drill cuttings and dust. Such changes may affect receptors which are reliant on the existing landscape character (such as tourism).

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Visual impact and a change in landscape character	2	-2	2	2	1	-20	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Visual impact and a change in landscape character	2	-1	2	2	1	-10	-2	Probable

Desired Outcome: To minimise potential visual impacts and changes to the landscape character

Actions

Mitigation:

- At the drill site, regular waste disposal and good housekeeping will ensure a low visual impact.
- Drill sites should be sufficiently rehabilitated. All drill cores as well as cuttings with a significantly different colour than the surface soil should be removed from site. Other cuttings can be dispersed around the site and loosely raked to limit the visual impact.
- Stored topsoil should be returned and spread over the site to speedup re-establishment of vegetation.
- Compacted soil must be ripped along contour and not down slope. This will loosen soil, promote water infiltration, aid re-vegetation and limit soil erosion.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- A report should be compiled of all complaints received and actions taken.
- Maintain a photo log for comparison of all exploration (drill) sites prior to entry by the drill team and after rehabilitation is completed.

9.1.13 Soil, Surface Water and Groundwater

Groundwater is the only source of potable water within the EPL area. Infiltration of as much uncontaminated precipitated water is greatly desired so as to recharge groundwater resources. Care must thus be taken to avoid contamination of soil and surface water. No known permanent surface water sources are present within the EPL area. Pollution in dry riverbeds may however result in downstream and groundwater pollution when they flow during rainy seasons.

Contamination of the groundwater can occur via polluted water infiltrating through sediments or through fractures, joints and faults that are present in the subsurface. Soil contamination can occur from chemical and hydrocarbon spills during refuelling, during maintenance of equipment and machinery, or if mobile fuel tanks (bowsers) are involved in accidents on route to drill sites. Hydraulic oil leaks are common on drilling rigs and pipe bursts may release oil into the environment. Contamination of groundwater could also occur through infiltration of waste from field toilets. This is specifically applicable to exploration camp sites.

Soil may further become compacted or disturbed (powdered) as a result of heavy motor vehicles and equipment and this affects soil quality and may lead to excessive erosion. Similarly, although very few steep sloped areas are present within the EPL, clearing of slopes greater than 12.5° may present a greater erosion risk.

Drilling of exploration holes may penetrate a confining aquifer layer (aquitard). This may cause mixing of aquifer water where the one aquifer may contain water of a poor quality, causing contamination of the aquifer having better quality. An alternative impact may be the leaking of water from one aquifer into another, causing existing boreholes to dry up or springs to dry up. Based on the limited amount of information available, it is not expected that such impacts would occur within the project area. It would however be advisable to take care during drilling that proper monitoring is taking place to evaluate for such conditions and that appropriate remedial actions be implemented where needed – the precautionary principal should be applied.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Contamination from hazardous material spillages	2	-3	2	2	1	-30	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Contamination from hazardous material spillages.	2	-2	2	2	1	-20	-3	Improbable

Desired Outcome: To prevent the contamination of soil and water

Actions

Prevention:

- Training of operators of machinery and vehicles and employees must be conducted on a regular basis (responsible driving, fuel and chemical handling, spill detection, spill control).
- All machinery and vehicles should be properly maintained to be in a good working condition with no leaks and reduced possibilities of pipe bursts/breakages.
- Employ drip trays and spill kits when leaks are detected or servicing / repairs of equipment is needed.

- The contents of mobile chemical toilets must be removed from site and disposed of at a registered waste water treatment plant.
- Limit movement to existing roads as far as is practically possible.
- Limit interference with drainage lines.
- Where drill sites are levelled to create drill pads and campsites, topsoil must be stored for rehabilitation purposes after drilling is complete and the site is decommissioned.
- If land clearing is required in areas with a slope greater than 12.5°, mitigation measures should be employed to prevent erosion and formation of gullies. All mitigation measures to be agreed with the land owner.

Mitigation:

- Any fuel spillage of more than 200 litre must be reported to the MIME.
- Spill clean-up means must be readily available on site as per the relevant MSDS and any spill must be cleaned up immediately to prevent it from reaching sensitive receptors.
- Hazardous waste must be contained and disposed of at a suitably classified hazardous waste disposal facility.
- Rehabilitate areas where soil or drainage lines are disturbed.
- Compacted areas can be lightly ripped and contoured to encourage vegetation establishment and to get rid of tracks.
- After exploratory drilling is complete, the boreholes must be handled according to the drill permit conditions. Where such conditions are lacking, boreholes should either be backfilled or secured with a steel or unplasticized polyvinyl chloride (uPVC) casing equipped with a secure cap. Drill cuttings should not be used for backfilling boreholes as minerals in the cuttings may have oxidised and will then potentially be released into the groundwater, together with salts present in the cuttings. Clean sand or clay should be used where possible.
- Backfilling or closing of the boreholes should be performed to avoid organisms from falling into the boreholes and to prevent surface runoff from contaminating the groundwater, where the borehole will form a preferential flow path if not properly sealed.
- Boreholes should be cemented where boreholes intersect confining layers separating aquifers with different water quality or causing artesian conditions.

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Maintain MSDS file for hazardous chemicals.
- Maintain a photo log for comparison of all exploration (drill) sites prior to entry by the drill team and after rehabilitation is completed
- Report all spills or leaks to management and immediately initiate clean-up.
- Maintain a register of all incidents on a daily basis. This should include measures taken to ensure that such incidents do not repeat themselves.

9.1.14 Ecosystem and Biodiversity

Some exploration activities are intrusive in nature, although mostly with relatively low impact. New roads may be required to allow machinery to be moved to exploration targets and drill sites will need clearing. Employees involved with exploration may be involved with poaching and illegal collection of plant and animal materials. Poachers may also use the presence of exploration teams on farms, to pose as members of the team, in order to poach. Impacts may also be related to pollution of the environment. Human / wildlife interactions further present a risk to both the wildlife and the people involved.

Disturbed sites are prone to the rapid establishment of invasive plants.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Poaching and ecological damage	2	-3	2	2	1	-30	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Poaching and ecological damage	2	-2	2	2	1	-20	-3	Improbable

Desired Outcome: To prevent poaching, ecological damage and pollution

Actions.

Prevention:

- Educate all contracted and permanent employees on the value of biodiversity and the importance of protecting the environment from disturbance.
- Where possible, removal of trees, especially protected species and large trees, must be avoided. The necessary permits from the Directorate of Forestry of the MEFT must be obtained for removal of all protected species.
- Liaise with the land owner on routes to be followed where new roads should be made and whether such roads should be rehabilitated after exploration ends or be left as is for the owner's use.
- Areas to be cleared must first be inspected for nests and burrows and these should be avoided.
- Strict conditions prohibiting harvesting and poaching of fauna and flora should be part of employment contracts. This includes prohibitions or regulations on the collection of firewood.
- Procedures to deal with human-wildlife conflict should form part of employee training/induction. The unwarranted killing of potentially dangerous animals, or those perceived as dangerous, or animals typically feared due to superstitious reasons, should be strongly discouraged.
- The footprint of drill sites, their associated laydown areas and access routes, should be kept to the smallest area possible and movement of vehicles outside of these area must be prohibited.
- Where drill sites are levelled to create drill pads, topsoil (overburden) must be stored for rehabilitation purposes after drilling is complete and the site is decommissioned.
- Exploration equipment transferred from completely different habitats to the EPL area must be thoroughly cleaned to limit the potential transfer of alien species to the area.
- Restrict driving to designated areas and avoid off-road driving.

Mitigation:

- Report any extraordinary animal sightings, conflict or incidents to the farm owner and MEFT.
- Report any suspicious people or dead animals, snares or traps encountered during exploration to the land owner.
- Mitigation measures related to waste handling and the prevention of groundwater, surface water and soil contamination should limit ecosystem and biodiversity impacts from pollution.
- At campsites, prevent scavenging of any waste by fauna.
- Disciplinary actions to be taken against all employees failing to comply with contractual conditions related to poaching and the environment.
- Compacted areas can be lightly ripped to encourage vegetation establishment and to get rid of tracks.
- Topsoil should be returned to such sites in order to re-establish the seed bank.
- Alien invasive species should be eradicated from drill sites during follow-up visits to rehabilitated areas.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Forestry Act regulations
- Invader species eradication to be reported on.
- All information and reporting to be included in a bi-annual report.

9.1.15 Dust

Dust may be generated as a result of vehicles travelling on gravel roads, strong winds picking up dust in cleared areas, due to the specific drilling methods, only limited dust as a result of drilling.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Dust	2	-2	2	2	1	-20	-3	Definite
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Dust	2	-1	2	2	1	-10	-2	Probable

Desired Outcome: To prevent any nuisance or health impacts as a result of dust.

Actions

Mitigation:

- Responsible driving speeds on gravel roads will limit dust generation.
- Road surfaces that become powdered due to heavy equipment must be rehabilitated to reduce dust.
- Dust masks as standard PPE for workers in situations with excessive dust.
- Implement dust suppression measures where possible and especially at drill sites close to public roads, if needed

Responsible Body:

- Proponent
- Contractors

Data Sources and Monitoring:

- Health and Safety Regulations of the Labour Act
- Maintain a complaints register.
- Bi-annual reporting on complaints and actions taken to address complaints and prevent future occurrences.

9.1.16 Waste

Various forms of waste will be produced during exploration activities. Waste may include hazardous waste associated with hydrocarbon products and chemicals, including soil and water contaminated with such products. Domestic waste will be generated by the workers. Sewage in chemical toilets will be produced. Waste presents a contamination risk and when not removed regularly may become a health and / or fire hazard and attract wild animals and scavengers. Due to the potential visual difference between drill cuttings and drill cores and the natural soil cover, it may be regarded as a type of waste.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Waste, littering and pollution	2	-2	2	2	1	-20	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Waste, littering and pollution	2	-1	2	2	1	-10	-2	Improbable

Desired Outcome: To reduce the amount of waste produced, and prevent contamination, pollution and littering.

Actions

Prevention:

- Develop a waste management plan and educate workers on the importance of proper waste management.
- Waste reduction measures should be implemented and all waste that can be re-used / recycled must be kept separate.
- Ensure adequate waste storage facilities are available that will prevent waste from being blown away by wind or being scavenged (human and non-human) or attract vermin.
- Hazardous wastes such as used oil and oil/diesel contaminated soil or water must be contained.
- In the unlikely event of a french drain being erected for employees, it should adhere to the Department of Water Affairs' guideline documents for the siting and construction of such facilities.

Mitigation

- All waste must be removed from the drill sites and camps once drilling is complete. Waste should be disposed of at appropriately classified disposal facilities, this includes hazardous material (empty chemical containers (e.g. oil containers) and contaminated materials (rugs, paper water and soil). Empty chemical containers must be destroyed in a way that would prevent reuse as a container after disposal.
- All drill cores as well as cuttings with a significantly different colour than the surface soil should be removed from site. Other cuttings can be dispersed around the site and loosely raked to limit the visual impact.
- Contents of chemical toilets must be removed from site and disposed of at a registered waste water treatment facility.

Responsible Body:

- Proponent
- Contractors

Data Ssources and Monitoring:

- A register of hazardous waste disposal should be kept. This should include type of waste, volume as well as disposal method/facility.
- Any complaints received regarding waste should be recorded with notes on action taken.
- All information and reporting to be included in a bi-annual report.

9.1.17 Heritage Resources

Within the EPL, the chance of discovering of archaeologically or culturally important artefacts is small. This is due to the overall lack in surface features, such as rocky hills and springs, that are typically associated with early human habitation. Should archaeologically or culturally important artefacts be discovered (e.g. unmarked graves, signs of early human habitation), it will have a positive academic value if preserved, but a negative impact if damaged.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Damaged archaeologically or culturally important artefacts	4	-3	3	3	1	-84	-4	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Preserved archaeologically or culturally important artefacts	4	3	3	3	1	84	4	Probable

Desired Outcome: To prevent the damage to, or destruction of, any archaeological, paleontological or culturally important (heritage) resources.

Actions

Prevention:

- Educate employees and contractors on what constitutes a possible heritage or archaeologically significant find and inform them to be vigilant for any extraordinary finds and to prevent any damage.

Mitigation:

- If and site or any other archaeologically important artefact is found during exploration, the "chance find procedure" must be implemented. In short, any work in that area must be halted, the area demarcated and the National Heritage Council informed.
- For any human remains, the Namibian Police must be informed as a first action.
- Work may only resume once the necessary permission is provided by the National Heritage Council.

Responsible Body:

- Proponent

Data Sources and Monitoring:

- Documenting and reporting of any incidents related to heritage, archaeological or paleontological resources.

9.1.18 Utilities and Infrastructure

Any damage caused to existing infrastructure and like fences, reservoirs, troughs, roads, etc. This includes damage/erosion of farm roads due to the movement of heavy machinery such as drill rigs to exploration sites. Borehole casings that becomes overgrown can present a danger to land owners if they drive off road and collide with it. This is not likely to happen as the EPL is very densely vegetated, making off-road driving nearly impossible.

Project Activity / Resource	Nature (Status)	(A1) Importance	(A2) Magnitude	(B1) Permanence	(B2) Reversibility	(B3) Cumulative	Environmental Classification	Class Value	Probability
Without Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Disruption in services supply and infrastructure damage	2	-2	2	2	1	-20	-3	Probable
After Preventative / Mitigation Measures									
Exploration and Site Decommissioning	Disruption in services supply and infrastructure damage	2	1	2	2	1	-10	2	Improbable

Desired Outcome: No impact on utilities and infrastructure.

Actions

Prevention:

- The Proponent must determine exactly where infrastructure like pipelines are situated. Liaison with owners of the land or suppliers of services (if applicable) is essential.
- Damaged farm roads and associated erosion ditches must be repaired in accordance with pre-arranged agreements with the land owner. The use of drill cuttings for this purpose should be considered as this will also serve as drill site rehabilitation.
- The land owner must be informed of the exact positions of any borehole casings protruding above the ground.

Mitigation:

- Emergency procedures for corrective action available on file.

Responsible Body:

- Proponent
- Contractors
- Land owner or suppliers of services

Data Sources and Monitoring:

- A report should be compiled of all incidents that occurred and corrective action taken.

9.2 ENVIRONMENTAL MANAGEMENT SYSTEM

The Proponent could implement an environmental management system (EMS) for their operations. An EMS is an internationally recognized and certified management system that will ensure ongoing incorporation of environmental constraints. At the heart of an EMS is the concept of continual improvement of environmental performance with resulting increases in operational efficiency, financial savings and reduction in environmental, health and safety risks. An effective EMS would need to include the following elements:

- A stated environmental policy which sets the desired level of environmental performance;
- An environmental legal register;
- An institutional structure which sets out the responsibility, authority, lines of communication and resources needed to implement the EMS;
- Identification of environmental, safety and health training needs;
- An environmental program(s) stipulating environmental objectives and targets to be met, and work instructions and controls to be applied in order to achieve compliance with the environmental policy;
- Periodic (internal and external) audits and reviews of environmental performance and the effectiveness of the EMS; and
- The EMP.

10 CONCLUSION

Votorantim Metals Namibia requires an ECC to allow for exploration activities on EPL 10042 in the Omaheke Region. Geo Pollution Technologies conducted an environmental assessment to determine the impacts of exploration on the environment of the specific EPL. The exploration activities of VMN can play a positive role in the Omaheke Region and Namibia as a whole. Through VMN, foreign funds are invested in Namibia and employment within VMN and their contractors are sustained. This improve employees' livelihoods and spending power which has a knock-on effect when they in turn support various business. Exploration activities also have the potential to benefit land owners, through the provision of information regarding subsurface geology which in turn may enable land owners to find potential groundwater resources, through compensation for services, etc.

Negative impacts of exploration entails limited ecological disturbances where vegetation needs clearing for exploration. Pollution of the environment can occur when there are hydrocarbon leaks from drilling equipment and vehicles, or where waste is not contained and removed from site. Poaching and theft are a concern, especially where criminals may seize the opportunity to pose as a member of the exploration team to gain access to the land. Fire, dust, erosion, noise and deterioration of farm roads are also impacts associated with exploration. Exploration related impacts must be prevented or mitigated by implementing the EMP and through strict monitoring and control. All permits and approvals must be obtained from relevant ministries or authorities. Pollution prevention measures should be adequate to prevent incidents that may potentially pollute soil, ground water and surface water. Health, safety and security regulations should be adhered to in accordance with the regulations pertaining to relevant laws and standards. Of main importance is that surface access agreements be reached with land owners and that the conditions stipulated in these agreements are adhered to at all times.

The EMP (section 9.1) should be used as an on-site reference document during exploration. Parties responsible for transgressing of the EMP should be held accountable according to the Proponent's standard procedures for handling of misdemeanours. The Proponent should use an in-house health, safety, security and environment management system, or similar, in conjunction with the EMP. All exploration personnel and contractors must be taught the contents of these documents.

Should the MIME and Directorate of Environmental Affairs (DEA) in the MEFT find that the impacts and related mitigation measures, which have been proposed in this report, are acceptable, the necessary authorisations and ECC may be granted to the Proponent. The ECC issued, based on this document, will render it a legally binding document which should be adhered to.

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Appendix A: Tree Atlas of Namibia List of Trees Known to Occur in the EPL Area

Trees recorded in the Tree Atlas of Namibia as occurring in the quarter degree squares overlapped by the EPL (Curtis & Mannheimer, 2005)

Name	Common Name	Conservation Concerns
Acacia erioloba	Camel-thorn	Protected by forestry legislation
Acacia fleckii	Sand-veld Acacia	
Acacia karroo	Sweet-thorn	
Acacia luederitzii var *luederitzii*	Kalahari Acacia	
Catophractes alexandri	Trumpet-thorn;Rattlepod	Invasive in some areas
Dichrostachys cinerea subsp *africana*	Kalahari Christmas Tree; Sickle-bush	Of concern because of its effects on other species (invasive)
Elephantorrhiza elephantina	Elands-bean	
Grewia flava	Velvet Raisin	
Grewia flavescens	Sandpaper Raisin	
Gymnosporia buxifolia	Common Spikethorn	
Searsia ciliata	Sour Karee	
Terminalia sericea	Silver Cluster-leave	
Commiphora angolensis	Sand Corkwood	
Acacia hebeclada subsp *hebeclada*	Candle-pod Acacia	
Acacia mellifera subsp *detinens*	Blue-thorn Acacia	Aggressive invasive
Bauhinia petersiana subsp *macrantha*	White Bauhinia	
Boscia albitrunca	Shepherd's Tree	Protected by forestry legislation
Ehretia alba	White-puzzle Bush	
Ozoroa paniculosa	Common Resin-bush	
Searsia lancea	Willow Rhus	Protected by forestry legislation
Searsia tenuinervis var *tenuinervis*	Kalahari Currant	
Tarchonanthus camphoratus	Camphor Bush	
Ziziphus mucronata	Buffalo-thorn	Protected by forestry legislation
Acacia ataxacantha	Flame-thorn	
Acacia hereroensis	Mountain-thorn	
Acacia reficiens subsp *reficiens*	Red-thorn	Very aggressive invader
Combretum hereroense subsp *hereroense*	Mouse-eared Combretum	
Diospyros lycioides	Bluebush	
Grewia avellana	Mezunzunvani	
Lycium bosciifolium	Limpopo Honey-thorn	
Philenoptera nelsii subsp *nelsii*	Kalahari Omupanda; Kalahari Apple-leaf	
Rhigozum brevispinosum	Simple-leaved Rhigozum	
Searsia pyroides	Fire-thorn Rhus; Common Currant	

Appendix B: Proof of Public Consultation

Press Notice: New Era - 10 and 17 March 2025

DRC gets new police station

Eveline de Klerk

SWAKOPMUND - The Democratic Resettlement Community (DRC), a township in Swakopmund, which is home to over 40 000 residents, has long faced challenges with criminal activities, leaving residents in constant fear for years.

However, thanks to a generous donation from Rössing Uranium, the community now has access to police services, after the mining company constructed a police station.

Rössing constructed a state-of-the-art police station to the tune of N$23 million. The station, which was inaugurated on Thursday, was constructed within five months. A total of 22 officers have been assigned to the new station.

The facility boasts four holding cells, each with an exercise courtyard, an interrogation room, a doctor's consultation room, a visitors' room, an armoury room, a records and archives room, an evidence room, four offices, a boardroom, ablution facilities, a secure passage for inmate drop-offs, dining area, a pantry, a laundry room, staff kitchen and a server/radio room. Safety and security minister Albert Kawana applauded the mine for their generous donation while acknowledging the ongoing challenges faced by residents due to the lack of a local police station.

Kawana said the station would significantly improve police response times, bringing law-enforcement services closer to the community and enhancing public safety. Police supremo Joseph Shikongo on the day also expressed gratitude towards Rössing Uranium, saying the station is more than just bricks and mortar.

"It is a testament to the commitment of the Namibian government, the ministry of home affairs and key stakeholders, including Rössing Uranium whose financial contribution made the facility possible," he said.

Rossing Uranium's board chairperson, Steve Galloway, pointed out that they opted to construct the police station to keep the community as well as their employees safe.

"Many people in the community lived in constant fear, not knowing whether they would wake up to a safe tomorrow.

Many of our employees had been victims while on their way to work or returning home," he said.

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Service... The new police station in Swakopmund's DRC settlement.
Photo: Contributed

Shangula commissions medical boat for Zambezi

Universal healthcare... Health minister Dr Kalumbi Shangula (left) on Friday officially commissioned a purpose-built medical boat aimed at bridging the gap in healthcare access for communities in flood-prone areas. Photo: Albertina Nakale

Albertina Nakale

KATIMA MULILO - Health Minister Dr Kalumbi Shangula on Friday commissioned a purpose-built medical boat aimed at bridging the gap in healthcare access for communities in flood-prone areas in Zambezi region.

"We gathered here today for a very special occasion to witness the commissioning of a purpose-built boat, designed to facilitate the transportation of health workers and patients on the water course," said Shangula. The boat, donated by the United States President's Emergency Plan for AIDS Relief (PEPFAR) at a cost of over N$600 000, is set to serve as a crucial healthcare lifeline for remote communities.

The minister said that the donation marks a significant milestone in Namibia's ongoing mission to provide integrated, affordable and quality healthcare services.

"The geography of the Zambezi Region presents unique challenges, particularly during the rainy season when flooding disrupts access to essential health services," Shangula stated.

Shangula added the boat is a targeted solution to ensure that all citizens, irrespective of location, have access to necessary healthcare services.

The introduction of the medical boat aligns with Namibia's recently approved Universal Health Coverage (UHC) policy.

"Namibia's UHC Service Coverage Index currently stands at 63%—one of the highest in the SADC region," Shangula noted.

Recognising the growing impact of climate change on healthcare service delivery, the minister underscored the need for innovative solutions. "Recurrent floods not only disrupt everyday life but also hinder critical healthcare services. This boat is not just a mode of transport - it is a lifeline. It can make a huge difference in maternal and child health services, as well as in managing disease outbreaks," he said.

Speaking at the event, Kabbe North constituency councillor Bernhard Sisamu echoed Shangula's sentiments, urging local communities to take responsibility for maintaining the donated boat.

"This boat is an invaluable resource, and it is imperative that we all take ownership of it. Let us work together to safeguard and maintain it so that it can serve us for many years to come," Sisamu stated.

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MTC Trivia awards three winners

Pricilla Mukokobi

MTC Trivia Summer awarded three brand new vehicles to lucky winners of the MTC Trivia Competition, which ran from 2 December 2024 to 2 March 2025.

Eneas Mulike (Windhoek), Edward Gei-Aibeb (Gocheganas) and Bind Penti-Ziipo (Walvis Bay) received keys to their brand-new cars on Thursday at MTC headquarters in Windhoek.

Mulike scooped the first prize of a 2024 Toyota Hilux double-cab bakkie, while Gei-Aibeb walked away with the second prize, a 2024 Toyota Corolla Cross 1.8, and Bind Penti-Ziipo triumphantly took home the third prize, a 2024 Toyota Starlet.

During the prize-giving ceremony, excitement was evident on the winners' faces, when they officially received their grand winnings, describing them as life-changing.

Receiving the car on behalf of her husband Eneas, Letta Mulike expressed gratitude for what she termed as a life-changer for her family.

"My husband has always participated in MTC competitions, but we never expected luck to pay off this big. I am filled with gratitude and excited and would like to encourage MTC to continue giving this life-changing opportunity to their customers," she said.

Gei-Aibeb expressed happiness to win a 2024 Toyota Corrola Cross 1.8 and gratitude to MTC.

"I encourage everyone to participate in the MTC trivia. I know its not easy but you just need to have faith," he said.

The big three winners were not the only winners as the campaign also had monthly prizes which saw 30 participants each walk away with brand new IPad. This is in addition to airtime worth more than N$200 000 given out during the duration of the campaign.

Shedding light on how the draw was conducted, MTC chief brand, marketing, corporate affairs, and sustainability officer Tim Ekandjo said all campaign draws were meticulously executed with transparency and fairness.

"We had a panel which consisted of two representatives from the Value-Added Services (VAS) team, one from Corporate Affairs, and one from Internal Auditor, ensuring the integrity of the selection process. Throughout the campaign, we witnessed a remarkable active engagement, and gained valuable insights into customers behaviour and preferences when it comes to gamification," he said.

-pmukokobi@nepc.com.na

Trivia winners... Winners in blue shirts, Letta Mulike (Windhoek), Edward Gei-Aibeb (Gocheganas) and Bind Penti-Ziipo (Walvis Bay) received keys to their brand-new vehicles on Thursday at MTC headquarters in Windhoek. Photo: Heather Erdamm

Press Notice: The Republikein - 10 and 17 March 2025

2 NUUS Republikein Maandag 10 Maart 2025

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'Publikasie van NAMIBIA MEDIA HOLDINGS (Pty)Ltd. gedruk deur NEWSPRINT NAMIBIA (Pty)Ltd.

WEER

BINNELAND: Gedeeltelik bewolk en warm tot baie warm met geïsoleerde tot verspreide donderbuie in die noordwestelike en sentrale dele van die land, asook die Hardapstreek, maar enkele tot geïsoleerde donderbuie word oor die noordoostelike dele verwag.
KUS: Gedeeltelik bewolk en warm tot baie warm met buie en donderbuie in die Noorde.
GETYE BY WALVISBAAI: L: 07:44 H: 13:53 L: 19:59

VOORUITSIGTE		
WINDHOEK	17°	28°
RUNDU	18°	30°
OSHAKATI	18°	29°
GOBABIS	19°	33°
MARIENTAL	18°	34°
KEETMANSHOOP	20°	33°
WALVISBAAI	16°	30°
LUANDA	24°	30°
JOHANNESBURG	15°	27°
KAAPSTAD	13°	24°

Swakopmund se strandpromenade strek van die Mole-strand tot by die Platz Am Meer-waterfront. FOTO ADAM HARTMAN

Nuwe baadjie

VAN BL. 1

Die ooreenkoms, wat deur die raad op sy laaste raadsvergadering op 27 Februarie goedgekeur is, word as 'n wen-wen-vennootskap vir beide partye beskou. Terwyl Swakopmund finansieel bevoordeel word om die gewilde wandelpad te help onderhou, verkry Hollard Namibië handelsmerksigbaarheid op 'n manier wat die promenade se geskiedkundige en kulturele betekenis respekteer.

Die promenade is 'n fokuspunt van die dorp se toerisme en ontspanning en verbind met ander bekende terreine, insluitend die jetty, Schad-promenade en Strand Hotel.

"Hierdie vennootskap sal help om te verseker dat die promenade 'n trekpleister vir beide plaaslike inwoners en internasionale besoekers bly, terwyl die finansiële druk op die munisipaliteit verminder word," het Wilfried Groenewald, voorsitter van die raadsbestuurskomitee op die raadsvergadering gesê.

Behalwe vir handelsmerke, maak die vennootskap die deur oop vir bykomende bydraes van Hollard Namibië, insluitend die moontlikheid vir vullisdromme langs die wandelpad om die gebied skoon te hou.

"Die voorstel is ook daarop gemik om Swakopmund se posisie as 'toonaangewende, innoverende toeristebestemming te verhoog," het Hollard gesê, wat die bekendstelling van QR-kodes op naamborde voorstel om besoekers digitale toegang tot geskiedkundige en toeriste-inligting oor die promenade te gee.

adam@erongo.com.na

Nored

VAN BL. 1

Hy het gesê Nored het 'n bewusmakingsveldtog begin om die gemeenskappe in te lig oor die gevare van onwettige verbindings en die koste daaraan verbonde.

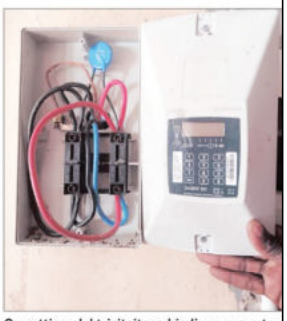
"Inwoners moet verstaan hoe hierdie kriminele aktiwiteite bedryfskoste verhoog, diegene wat die misdade pleeg in gevaar stel, infrastruktuur in gevaar stel en risiko's inhou vir Nored-personeellede wat aan elektrisiteitsinstallasies werk," het Lukas gesê.

OPSPORING

Hy het verduidelik dat Nored onwettige elektrisiteitsverbindings opspoor deur veldtegnici se roetineinspeksies, monitering van kragverbruik, patrone deur meterlesings, samewerking met die Namibiese polisie en openbare bewusmakingsinisiatiewe, insluitend radioprogramme en gemeenskapsvergaderings.

"Onwettige verbindings kan ook wanbalanse in die netwerk skep, wat die stabiliteit en doeltreffendheid daarvan beïnvloed. Elektrisiteit is uiters gevaarlik en moet altyd wettig en veilig verskaf word om die verlies van onskuldige lewens en beserings te voorkom," het Lukas beklemtoon.

- republikein@republikein.com.na



Onwettige elektrisiteitsverbindings neem toe FOTO VERSKAF

Nored se woordvoerder, Simon Lukas, waarsku teen onwettige elektrisiteitsverbindings. FOTO VERSKAFPHOTOS: FILE

Skoolvoedingsprogram

VAN BL. 1

Verder is daar 'n onderwysontwikkelingsfonds wat onder meer vir skooluniforms vir gemarginaliseerde leerders kan betaal wanneer skole daarvoor aansoek doen.

"As daar voorvalle is waar leerlinge weggewys word weens onvermoë om te betaal, moet dit onmiddellik aan die streekskantoor aangemeld word wat die situasie sal regstel," sê die uitvoerende direkteur se kantoor.

Die onderwysministerie moedig ook ouers aan om die ministerie van geslagsgelykheid, armoede-uitwissing en maatskaplike welsyn te nader vir bystand met finansies, vervoer en toegang to onderwys vir lede van gemarginaliseerde gemeenskappe. Leerlinge wat nie koshuisfooie kan bekostig nie, word aangemoeding om aansoek vir vrystelling by die betrokke skoolraad te doen. Die onderwysministerie verskaf ook N$22 per kind per dag vir die huisvesting van leerlinge in gemeenskapskoshuise.

Die uiters belangrike nasionale skoolvoedingsprogram is onder druk weens hoë mieliepryse, aldus die onderwysministerie. FOTO ARGIEF

Oor die afgelope jaar het die ministerie twee koshuise gebou, met verdere uitbreidings van koshuisakkomodasie vir die komende vyf jaar beplan. Bouwerk aan koshuise by die Pendukeni I Ithana Sekondêre Skool gaan voort, soos ook by die Onkumbula Gekombineerde Skool, Schuckmansburg fase twee en Ndoro. Skole op Driomiopsis, Otjivanda, Aussenkehr, Bravel, Onamutayi en Nkurenkuru is ook ingesluit in die beplanning vir die uitbreiding van koshuisgeriewe.

In agt van vroeëkinderontwikkelingsentrums is die betaling van onderwysers steeds die verantwoordelikheid van die ministerie van geslagsgelykheid, armoede-uitwissing en maatskaplike welsyn, volgens die onderwysministerie. Die ministeries werk egter saam om kinderontwikkeling na die ministerie van onderwys, kuns en kultuur oor te dra.

Verder moet skole nie leerlinge sonder identiteitsdokumente wegwys nie, maar kan beëdigde verklarings van hoofmanne of kerkleiers gebruik word om ouerdom vas te stel. Daarna moet die skool help dat leerlinge teen die einde van primêre skool identiteitsdokumente bekom.

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2 NUUS Republikein Maandag 17 Maart 2025

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'n Publikasie van NETWORK MEDIA HUB (Pty)Ltd. gedruk deur PRINT MEDIA HUB (Pty)Ltd.

WEER

WEERWAAK: Swaar donderbuie en reën met kitsvloede kan die week oor dele van die noordelike, sentrale en suidelike streke voorkom. Môre kan swaar donderbuie en reën oor die noordelike en sentrale kus uitsak.
BINNELAND: Gedeeltelik bewolk en matig tot baie warm met wydverspreide donderbuie oor Kunene, Omusati, Oshana, Ohangwena, Oshikoto, Otjozondjupa, Omaheke, Erongo, Khomas, Hardap en ǁKharas.
KUS: Gedeeltelik bewolk en matig tot warm met miskolle in die oggend.
GETYE BY WALVISBAAI: H: 05:00 **L:** 09:33 **H:** 17:15

VOORUITSIGTE

WINDHOEK	16°	25°
RUNDU	17°	29°
OSHAKATI	20°	26°
GOBABIS	19°	26°
MARIENTAL	17°	32°
KEETMANSHOOP	18°	30°
WALVISBAAI	16°	25°
LUANDA	24°	31°
JOHANNESBURG	12°	20°
KAAPSTAD	25°	0°

Ouetehuise

VAN BL. 1

Vir pensioenarisse wat uitsluitlik op die regering se pensioentoelaag van N$1 600 staatmaak, beteken dit N$64 met 'n bykomende N$12,45 vir water. Elektrisiteitsrekeninge wat wissel van N$400 tot N$500 per maand, is die huurder se eie verantwoordelikheid.

Die ministerie dra die oorblywende bedryfskoste, wat maandeliks tussen N$400 000 en N$600 000 beloop.

Die vertraging in die plasing van nuwe huurders word toegeskryf aan uitstaande skuld wat deur vorige huurders agtergelaat is wat óf verhuis óf gesterf het.

In sommige gevalle het die huurders agterstallig met hul huur en munisipale rekeninge geraak, wat volgens die ministerie tot finansiële komplikasies lei.

Volgens die ministerie is skuld in 2023 afgeskryf en is die plasing van nuwe huurders aan die gang. Geen tydlyn hiervoor is egter aan NMH verskaf nie.

Ten spyte van die verduidelikings, groei frustrasie daagliks onder bejaardes wat op behuising wag.

Verskeie het beweer hulle het reeds jare gelede aansoek gedoen en nooit enige terugvoering ontvang nie.

Die vervalle toestand van eenhede wat glo al jare lank by Senior Park in Windhoek leeg staan. FOTO'S PHILLIPUS JOSEF

'n Bejaarde bron wat verkies het om anoniem te bly, het bevestig inwoners by die ouetehuis word gereeld deur pensioenarisse genader wat desperaat is vir verblyf.

"Hulle kom vra hier of daar plek is, maar al wat ek kan sê is dat hulle met die ministerie moet opvolg," het die bron gesê.

SWAKOPMUND

Dit is egter nie net in die hoofstad waar staatsbeheerde behuising vir bejaardes 'n probleem is nie.

In Swakopmund het 'n inwoner van Welwitschia Park gesê inwoners is verantwoordelik vir die instandhouding van die huise.

"Tog bly dit toe en word vir ons gesê mense kan nie daarin woon nie," het Rita Bronkhorst gesê.

"My broer is al vir ses jaar op 'n waglys. Ten spyte van die feit dat hy aangebied het om een van die huise self op te knap, is hy nog elke keer afgewys.

"Intussen word huise toegeken aan diegene wat eerste 'n bod insit," het sy gesê.

Brigitte Thaumüller, wat vir meer as 20 jaar tot 2011 huur by Senior Park en Eastern Court in Windhoek ingevorder het, meen dat wanbestuur 'n kernprobleem is.

"Beide plekke was tot dan in 'n goeie toestand. Ek dink die beamptes wat verantwoordelik is vir die toekenning van die huise is onbevoeg.

"Daar is aan 'n persoon wat ek ken gesê as sy N$3 000 betaal, sou sy 'n kans staan om plek te kry.

"Ek het dit self aangemeld, maar dit is moontlik net onder die mat ingevee," het sy beweer.

Namibië het 17 private ouetehuise wat by die ministerie geregistreer is en onder meer in Windhoek, Swakopmund, Keetmanshoop, Okahandja en Lüderitz geleë is.

Sewe staatsbeheerde geriewe fokus op bejaarde inwoners met 'n lae inkomste, insluitend Senior Park, Eastern Court en ook geriewe op Outjo, Gobabis, Keetmanshoop en Swakopmund.

Dié tehuise vir bejaardes word in samewerking met die ministerie van werke en vervoer bestuur, wat oorhoofs verantwoordelik is vir instandhouding en herstelwerk.

Die gesondheidsministerie het die behoefte aan dringende opknappings- en instandhoudingswerk by Senior Park erken, maar gesê dit val onder kapitale projekte wat onderhewig is aan begrotingstoekennings.

- republikein@republikein.com.na

In situ-mynbou

VAN BL. 1

Die president van die Namibiese Hidrogeologiese Vereniging, Ester Gustavo, het Miller beskryf as die "oupa van geologie in Namibië".

"Ons vertrou sy navorsing," het sy namens die klein groepie Namibiese kundiges op hierdie gebied van wetenskap gesê.

Miller beskryf die uiters belangrike kom as sandsteen waarin die uraanerts binne 'n spesifieke liggaam opgelos word, binne die hoofbron Auob-formasie wat drinkwater aan gemeenskappe in Suid-Afrika, Botswana en Namibië verskaf. Rotsbreuke loop deur die lae van die ondergrondse waterdraende gesteentes, na die weste van noord na suid en in die ooste van wes na oos. Hierdie sones van gebreekte rots is waar water opwaarts kan sypel, verduidelik Miller.

Volgens hom is dit 'n groot probleem vir die tipe mynbou wat voorgestel word, en ook die ensgste tipe mynbou wat die uraan daar kan ontgin.

"Die proses waaroor ons so ontevrede is, in situ, behels dat 'n oplossing tot binne die ertsliggaam gepomp word om die uraan vry te stel," sê hy. Die oplossing word weer opgepomp vir verwerking. Met herhaalde gebruik word dieselfde oplossing meer en meer gekonsentreerd met uraan en ander radioaktiewe radionuklieide.

Dit bestaan uit 'n swak swaelsuur en 'n sterk oksidant wat gewoonlik deur twee boorgate ingespuit word en deur 'n ander herwin word, met omliggende boorgate om binne en aan die rand van die myngebied vir enige ontsnapping van die oplossing te monitor.

So 'n in situ-myngebied kan tot 26 000 boorgate oor 'n tydperk van tot 50 jaar hê. Die praktyk is wêreldwyd gewild en word streng in Amerika gereguleer, waar 750 lisensie-oortredings sedert 2003 aangeteken is, brei hy uit.

"Byna die helfte van die wêreld se ontginde uraan kom tans van in situ-mynbou," sê Miller.

"By Stampriet is die risiko van kruisbesmetting onaanvaarbaar weens die belangrikheid van die ondergrondse drinkwater wat landbou moontlik maak deur grootskaalse besproeiing, en sonder enige oppervlakwaterbron, as die enigste bron van water vir honderde kilometers dien.

"Kruisbesmetting is moontlik omdat die sandsteenlae aan mekaar en deur die rotsbreuke raak, sê Miller.

"Daar is baie plekke vir natuurlike kruisbesmetting," voer hy aan.

In die geval dat die oplossing uit die myngebied sou ontsnap, word die inspuiting daarvan onmiddellik gestaak en kan alle boorgate gebruik word om dit te probeer onttrek. Daar is egter geen sekerheid oor waarheen die besmette water sal vloei nie, en hoewel die ondergrondse water baie stadig ongestoord vloei, sal in situ-mynbedrywighede die vloei beïnvloed en versterk, volgens Miller.

"'n Mens weet eenvoudig nie waarheen die water gaan nie," sê hy.

Miller se navorsing dui daarop dat meer as ses miljoen kubieke meter vars water jaarliks uit die Stampriet-kom gebruik word, met tot 100 000 mense wat van die waterbron afhanklik is.

"Ons kos kom daarvandaan," sê hy.

Miller sê pogings deur 'n Russiese maatskappy om uraanmynbou op Stampriet tot die toetsfase te bevorder, is gestaak weens 'n onvoldoende omgewingsimpakstudie wat by die ministerie van die omgewing, bosbou en toerisme ingedien is, en dat die minister van landbou, water en grondhervorming, Calle Schlettwein, ook nie in situ-loging-mynbou op Stampriet toelaat nie.

"Ons weet nie wat met die volgende minister gaan gebeur nie," sê Miller.

"Ons organisasie (die Vereniging vir Uraanmynbou in die Stampriet-akwifer, Sauma) het herhaaldelik probeer om met die omgewingsminister en die mynminister te praat, sonder sukses.

"Ministeriële amptenare, veral van mynbou, het wel van my toesprake bygewoon, maar ek het geen benul wat hulle dink of wat hulle vir mekaar sê nie," sê hy.

Miller hou vol: "Dit is baie belangrik om te verstaan om ons water te beskerm. Ons redes is wetenskaplik. Ons werk is om die besluitnemers te oortuig," voer hy aan. Gustavo het gesê: "Kom ons bid dat ons regering na ons sal luister."

- augetto@nmh-hub.com.na

ACC

VAN BL. 1

Een van die grootste aantygings betrek die Nawa Nawa-konstruksiemaatskappy wat glo kontrakte vir beide Fase 1 en Fase 2 vir die Lüderitz Waterfront-ontwikkeling ontvang het sonder 'n oop tenderproses.

Nadat die Nexus-groep se kontrak beëindig is, het Nawa Nawa met die projek voortgegaan sonder duidelike motivering of 'n nuwe tender wat geadverteer is, wat kommer oor deursigtigheid laat ontstaan het.

Nawa Nawa bou na bewering ook Samuehl se private woning wat vrae laat ontstaan het oor 'n potensiële konflik van belange.

LWDC het na bewering gimnasiumtoerusting teen die hoogste gekwoteerde prys aangekoop eerder as die mees kosteddoeltreffende opsie.

Die gimnasium se eienaar is glo ook van Samuehl se tuisdorp, wat tot die bespiegeling van begunstiging gelei het.

Nog 'n bewering sluit in onreëlmatige aanstellingspraktyke binne LWDC, met verskeie werknemers, insluitend skoonmakers, wat na bewering vir die poste gewerf is sonder 'n formele proses of openbare advertensies.

Die hoof van die skoonmaakdepartement is glo Samuehl se suster en daar is geen rekord oor hoe sy die pos gekry het nie.

Die ACC se adjunkdirekteur, Erna van der Merwe. FOTO NIKANOR NANGOLO

Angel Tordesillas het sedert 2009 as LWDC se raadsvoorsitter gedien, ten spyte van raadslede wat oor die jare geroteer het.

Bewerings dui daarop dat hierdie verlengde ampstermyn gekoppel kan word aan pogings om beheer oor LWDC se bedrywighede te behou sonder eksterne toesig.

Kommer is ook geopper oor die finansiering van Samuehl se boek *Lüderitz: A Journey Through Time*, met Tordesillas as mede-outeur.

Die boek is na bewering deur LWDC se lopende rekening gefinansier, ondanks aansprake dat Novanam dit geborg het.

Dit het vrae laat ontstaan oor of die maatskappy se geld vir 'n persoonlike projek misbruik is.

Bewerings dui daarop dat personeel wat kommer oor korrupsie by LWDC geopper het, intimidasie, viktimisering en afdanking in die gesig gestaar het.

Samuehl is vir kommentaar genader en het alle vrae na Tordesillas verwys, wat nie kommentaar op die bewerings wou lewer nie.

NMH het vroeër berig Samuehl word oorweeg om George Simataa op te volg as sekretaris van die kabinet, wat aftreeouderdom bereik het. Samuehl het egter verlede week ontken dat hy enige amptelike aanbod ontvang het.

- nikanor@nmh-hub.com.na

Site Notice – On D1808

Site Notice – On D1658

Site Notice – On C29

Notification Letters

Letter to Omaheke Regional Council

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CELL.: (+264-81) 1220082
PO BOX 11073 ♦ WINDHOEK ♦ NAMIBIA
E-MAIL: gpt@thenamib.com

To: **The Chief Regional Officer**
Omaheke Regional Council
Omaheke Regional Office Park
Portion 39, Gobabis Townlands No. 114
Gobabis

10 September 2025

Dear Sir/Madam

Re: **Request for Letter of Support - Environmental Clearance Certificate (ECC) Application, EPL 10042, Omaheke Region**

Votorantim Metals Namibia intends to apply for an environmental clearance certificate (ECC) for EPL 10042. The environmental assessment report and environmental management plan for the project were completed and will be shared with your office via email.

As part of the ECC, the MEFT requests a letter of support or consent from the relevant regional authority, for the approval of the ECC. We therefore would like to take the opportunity to request a letter of support/consent from the Omaheke Regional Council for the ECC application.

Please note that your letter of support/consent will not in any way hold the Omaheke Regional Council accountable for any misleading information or adverse effects that may arise from the project execution activities. Instead full accountability will remain with the Proponent, Votorantim Metals Namibia.

Your assistance in this regard is highly appreciated and do not hesitate to contact our offices for any additional information regarding this application and its associated processes.

Sincerely,

André Faul
Environmental Practitioner

Letter to Executive Director: Ministry of Agriculture, Fisheries, Water and Land Reform

GEO Pollution Technologies
TEL.: (+264-61) 257411 ♦ FAX.: (+264) 88626368
CELL.: (+264-81) 1220082
PO BOX 11073 ♦ WINDHOEK ♦ NAMIBIA
E-MAIL: gpt@thenamib.com

To: **The Executive Director**
Ministry of Agriculture, Fisheries Water and Land Reform
Private Bag 13184
Windhoek

24 July 2025

RECEIVED
2025 -07- 28
EXECUTIVE DIRECTOR'S OFFICE
MAFWLR

Dear Ms Nghituwamata

Re: **ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR EXCLUSIVE PROSPECTING LICENCE 10042, OMAHEKE REGION**

Geo Pollution Technologies (Pty) Ltd was appointed by Votorantim Metals Namibia (Pty) Ltd to apply for an environmental clearance certificate (ECC) for the proposed exploration activities related to exclusive prospecting licence (EPL) 10042 in the Okurukambe Constituency of the Omaheke Region. The ECC is required as per the Environmental Management Act No. 7 of 2007 (EMA). In support of the ECC application, an environmental scoping impact assessment (EIA) and environmental management plan (EMP) will be submitted to the Ministry of Environment, Forestry and Tourism's Directorate of Environmental Affairs (DEA).

Project: Environmental Assessment and Management Plan for Exclusive Prospecting Licence 10042, Omaheke Region

Proponent: Votorantim Metals Namibia (Pty) Ltd

Environmental Assessment Practitioner: Geo Pollution Technologies (Pty) Ltd

The Proponent received an "Intention to Grant" from the Ministry of Mines and Energy in respect of their application for EPL 10042 in the Omaheke Region. The EPL will be granted to the Proponent upon successful acquisition of an environmental clearance certificate (ECC) for the EPL area, as indicated on Page 2. The EPL is for base and rare metals, industrial minerals and precious metals. Exploration may entail desktop studies, remote sensing, field surveys, soil and geochemical studies, geophysical surveys and exploration drilling.

Public participation for the project is ongoing. Should your office have any interest in the EIA process, you are herewith invited to register with the environmental consultant to receive further documentation and communication regarding the project. Please register at:

Fax: 088-62-6368 or **E-Mail:** epl_10042@thenamib.com.

Should you require any additional information please contact Geo Pollution Technologies at telephone 061-257411.

Sincerely,
Geo Pollution Technologies

André Faul
Environmental Practitioner

COPY

Letter to Executive Director: Ministry of Industries, Mines and Energy

Friedburgh 29/07/2025

GEO Pollution Technologies

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CELL.: (+264-81) 1220082
PO BOX 11073 ♦ WINDHOEK ♦ NAMIBIA
E-MAIL: gpt@thenamib.com

To: **The Executive Director**
Ministry of Industries, Mines and Energy
Private Bag 13297
Windhoek

24 July 2025

Dear Mr Nangombe

Re: **ENVIRONMENTAL ASSESSMENT AND MANAGEMENT PLAN FOR EXCLUSIVE PROSPECTING LICENCE 10042, OMAHEKE REGION**

Geo Pollution Technologies (Pty) Ltd was appointed by Votorantim Metals Namibia (Pty) Ltd to apply for an environmental clearance certificate (ECC) for the proposed exploration activities related to exclusive prospecting licence (EPL) 10042 in the Okurukambe Constituency of the Omaheke Region. The ECC is required as per the Environmental Management Act No. 7 of 2007 (EMA). In support of the ECC application, an environmental scoping impact assessment (EIA) and environmental management plan (EMP) will be submitted to the Ministry of Environment, Forestry and Tourism's Directorate of Environmental Affairs (DEA).

Project: Environmental Assessment and Management Plan for Exclusive Prospecting Licence 10042, Omaheke Region

Proponent: Votorantim Metals Namibia (Pty) Ltd

Environmental Assessment Practitioner: Geo Pollution Technologies (Pty) Ltd

The Proponent received an "Intention to Grant" from the Ministry of Mines and Energy in respect of their application for EPL 10042 in the Omaheke Region. The EPL will be granted to the Proponent upon successful acquisition of an environmental clearance certificate (ECC) for the EPL area, as indicated on Page 2. The EPL is for base and rare metals, industrial minerals and precious metals. Exploration may entail desktop studies, remote sensing, field surveys, soil and geochemical studies, geophysical surveys and exploration drilling.

Public participation for the project is ongoing. Should your office have any interest in the EIA process, you are herewith invited to register with the environmental consultant to receive further documentation and communication regarding the project. Please register at:

Fax: 088-62-6368 or **E-Mail:** epl_10042@thenamib.com.

Should you require any additional information please contact Geo Pollution Technologies at telephone 061-257411.

Sincerely,
Geo Pollution Technologies

André Faul
Environmental Practitioner

Notified and Registered Interested and Affected Parties

Name	Farm / Organisation
H Steinbrück	Hetaku FML/01035/00001
HL Lamprecht	Rooikraal Game Ranch FML/01020
Joachim	Riviersdal FML/00134
MAFWLR	Boomlager FML/00328
Von Schumann	Marigold FML/00136
Chris and Carina Alberts	Delville FML/00146 - Northern Portion
Christiaan Cilliers	Rooigrond FML/00144
Earnie Held	Otjivero FML/00202/00REM
Ernst Ludwig Cramer	Rogers FML/00196
GE Hakenjos	Hetaku FML/01035/00REM
Georrg Friederich	Gottesgabe FML/00159
Harald Horsthemke	Stoetzer FML/00195
Harald Jacobsz	Osombahe Nord 1019
Hartmuth Held	Geiersberg FMK/00201/00001; Omitara-West FMK/00203/00REM; Omitara-West FMK/00203/0000A; FML/00109/0000A; De Hoop FML/00110; De Hoop North FML/00129
Herald Grabowski	Fulma 204; Omitara 109
Jannie Delport	Toekoms 125
Nico Pretorius	Nuwe Orde FML/00826; Mundsfarm FML/00826; The Mark FML/00132
Nicolene Coetzee	Kanonschoot 131;
Pieter Guttermeyer	Okapaue West FML/00194
Pieter Hough	Nuwe Orde FML/00826
Rene Kronsbein	Apex FML/00327
Robert Pack	Okasandu FML/00158
Ryno Kapuuo	Heatherbelle FML/00197
Schalk Grobbelaar	Riviera FML/00139/0000A; Riviera FML/00139/0000B; Mundsfarm FML/00192; Mex FML/00145; Hetaku FML/01035/00051
Sigi Wilkens	Omatewa North FML/00126/00002; Omatewa North FML/00126/00001; Protea FML/00135
Gunar Wilkens	Omatewa North FML/00126/00002; Omatewa North FML/00126/00001; Protea FML/00135
Stirling Salt	Ongava-onuea FML/00147
Thomas Goldbech	Astra FMK/00205; Buchow FML/00108/00002
Tony Steenkamp	Delville FML/00146 - Southern Portion
Uetunjengua Moses Hengari	Iowa FML/00133
Ute and Werner Kessler	Idaho FML/00137/00001 (Magoras); Spinosa FML/00138
Vanessa Glowania	Riviersdal B FML/00134/00001
W vd Berg	Schoch FML/00193
Willem Haoseb	Gross Osombahe FML/01042
Jolanda Kamburona	NamWater
Fillemon Aupokolo	NamWater
Hafeni Hiveluah	Hiveluah Consult
	Omaheke Regional Council

Name	Farm / Organisation
Executive Director	Ministry of Agriculture, Fisheries and Land Reform
Executive Director	Ministry of Industries, Mines and Energy

Communication received from IAPs. Communication and contact details have been redacted in order to protect the privacy of IAP or for security reasons. Correspondence is presented as received with no correction of grammar and spelling.

Communication Received	Response
From: Siegfried Wilckens **Dated: 19/05/2025**	
RE: Exploration as per Annexure A – EPL No:10042 For Attention: Quzette Bosman With Reference to the proposed exploration efforts communicated by yourself to certain members of the Affected and Adjacent properties - I am formally requesting to be added to the communication - as an Interested and/ or Affected party with immediate effect. Please confirm receipt of this request and notification within 3 days of receipt and duly supply any/ all related information regarding the above – to the email address or number from which this notification was received. Clarification can/ may then be provided as to in which regard myself as Owner/ Occupier of land adjacent to the site would need clarity on.	Noted and added as IAP
From: Gunnar Wilckens **Dated: 19/05/2025**	
RE: Exploration as per Annexure A – Undisclosed EPL No:10042 For Attention: Quzette Bosman With Reference to the proposed exploration efforts communicated by yourself to certain members of the Affected and Adjacent properties - I am formally requesting to be added to the communication - as an Interested and/ or Affected party with immediate effect. Please confirm receipt of this request and notification within 3 days of receipt and duly supply any/ all related information regarding the above – to the email address or number from which this notification was received. Clarification can/ may then be provided as to in which regard myself as Owner/ Occupier of land adjacent to the site would need clarity on.	Noted and added as IAP
From: Nicolene Coetzee (Kanonschoot 131) **Dated: 20/05/2025**	
RE: Exploration as per Annexure A – EPL10042 For Attention: Quzette Bosman With Reference to the proposed exploration efforts communicated by yourself to certain members of the affected and adjacent properties, I am herewith formally requesting to be added to the communication as an interested and/or affected party with immediate effect. Please confirm receipt of this request and notification within 3(three) days of receipt and duly supply any/all related information regarding the above to the email address and/or number from which this notification was received. Clarification can/may then be provided as to in which regard myself as owner/occupier of land adjacent to the site would need clarity on.	Noted and added as IAP

From: Nico Pretorius (Nuwe Orde 826) **Dated: 21/05/2025**	
RE: Exploration as per Annexure A – EPL10042 – Farm Nuwe Orde no.826 For Attention: Quzette Bosman | With Reference to the proposed exploration efforts communicated by yourself to certain members of the affected and adjacent properties, I am herewith formally requesting to be added to the communication as an interested and/or affected party with immediate effect. Please confirm receipt of this request and notification within 3(three) days of receipt and duly supply any/all related information regarding the above to the email address and/or number from which this notification was received. Clarification can/may then be provided as to in which regard myself as owner/occupier of land adjacent to the site would need clarity on.	Noted and added as IAP
From: Nico Pretorius (The Mark 132) **Dated: 21/05/2025**	
RE: Exploration as per Annexure A – EPL10042 – Farm The Mark no.132 For Attention: Quzette Bosman With Reference to the proposed exploration efforts communicated by yourself to certain members of the affected and adjacent properties, I am herewith formally requesting to be added to the communication as an interested and/or affected party with immediate effect. Please confirm receipt of this request and notification within 3(three) days of receipt and duly supply any/all related information regarding the above to the email address and/or number from which this notification was received. Clarification can/may then be provided as to in which regard myself as owner/occupier of land adjacent to the site would need clarity on.	Noted and added as IAP
From: H Grabowsky (Fulma 204; Omitara 109) **Dated: 21/05/2025**	
Registreer my tog asb as „interested and affected party“ vir EPL 10042.	Noted and added as IAP

From: H Held (Geiersberg FMK/00201/00001; Omitara-West FMK/00203/00REM; Omitara-West FMK/00203/0000A; FML/00109/0000A; De Hoop FML/00110; De Hoop North FML/00129) **Dated: 21/05/2025**	
Re: Exploration as per Annexure A No:10042 For Attention: Quzette Bosman With Reference to the proposed exploration efforts communication by yourself to certain members of the Affected and Adjacent properties- I am formally requesting to be added to the communication- as an Interested and/ or Affected party with immediate effect. Please confirm receipt of this request and notification within 3 days of receipt and duly supply any/ all related information regarding the above-to the email address or number from which this notification was received. Clarification can / may then be provided as to in which regard myself as owner of land adjacent to the site would need clarity on.	Noted and added as IAP
From: Pieter Hough (Nuwe Orde 826) **Dated: 19/05/2025**	
RE: Exploration as per Annexure A – EPL10042 For Attention: Quzette Bosman With Reference to the proposed exploration efforts communicated by yourself to certain members of the Affected and Adjacent properties - I am formally requesting to be added to the communication - as an Interested and/ or Affected party with immediate effect. Please confirm receipt of this request and notification within 3 days of receipt and duly supply any/ all related information regarding the above – to the email address or number from which this notification was received. Clarification can/ may then be provided as to in which regard myself as Owner/ Occupier of land adjacent to the site would need clarity on.	Noted and added as IAP
Dated: 21/05/2025 **From: Vanessa Glowania (Riviersdal 134)**	
RE; Exploration as per Annexure A - Undisclosed EPL No. 10042 Attention: Quzette Bosman With reference to the proposed exploration efforts communicated by you to certain members of the Affected and Adjacent farms, I am formally requesting from you that I am to be added to the communication as an Interested and Affected party with immediate effect. Please confirm receipt of this request and also supply me with all the related information regarding the above mentioned and notify me within 3 (three) days of receiving this to the email address from which this notification was sent. Clarification can or may then be provided as to which regard myself as Owner/Occupant of land adjacent to the site would need clarity on.	Noted and added as IAP
From: Werner and Ute Kessler (Idaho FML/00137/00001 (Magoras); Spinosa FML/00138) **Dated: 16/05/2025**	
Dear Andre, We would like to register for the above project and to receive all info.	Noted and added as IAP

From: Hafeni Hiveluah **Dated: 16/05/2025**	
Good day Andre, Pls register me as an IP as per the notice published in New Era on the 10th March 2025.	Noted and added as IAP

Summary of Meetings with Land Owners Requesting to Meet in Person (Geo Pollution Technologies representative: André Faul

Thomas Goldbech
A general discussion regarding the EPL and proposed exploration activities occurred. No major concerns were raised by Mr Goldbech.
HL Lamprecht
The ECC and EPL application processes were explained and questions were answered. Mr Lamprecht noted that the farm is pristine with very limited human impact. The major concern raised by Mr Lamprecht was related to the farm's main source of income which is from trophy hunting operations. Any interference by exploration activities on the farm may negatively affect trophy hunting operations and thus their core business. Specifically, aerial surveys making use of low flying helicopters or aeroplanes may result in frightened game injuring themselves, for example when running into fences. The physical presence of exploration teams on the farm will also interfere with hunting operations as hunting with people present on the farms presents serious risks of injury. Mr Lamprecht also stated that no camping by exploration teams can be allowed on the farm. Dr Faul noted that it is a policy of the Proponent not to allow employees to camp unless there is absolutely no other option available.
H Grabowsky
The ECC and EPL application processes were explained and questions were answered. Mr Grabowsky mentioned that when the exploration team requires additional labourers, they should consult with him and he will either provide or approve the proposed labourers. He's concerns further relate to increased risks of fire, poaching, theft and other types of crime, damage to infrastructure and impacts on groundwater which is already a scarce resource.
S Grobbelaar
The ECC and EPL application processes were explained and questions were answered. Mr Grobbelaar noted that Riviera and Hetaku are game farms and part of their business activities is hunting operations. Livestock farming. One of his main concerns relates to the scarcity of groundwater and he indicated that any information arising from geophysical surveys or drilling, that may increase the success rate in drilling for groundwater, would be welcomed. Mr Grobbelaar also indicated the presence of an old grave on farm Hetaku.
W Kessler
The ECC and EPL application processes were explained and questions were answered. Mr Kessler mentioned that the valley formed by the Black Nossob River has abundant wildlife and his main concern is the potential impact of aerial surveys on such wildlife. He's concerns further relate to increased risks of fire, poaching, theft and other types of crime, damage to infrastructure and impacts on groundwater.
C Alberts
The ECC and EPL application processes were explained and questions were answered. A general discussion regarding exploration and mining ensued which included mining activities of other companies in the area. General concerns were raised, which is shared by most farmers, relating to increased risks of fire, poaching, theft and other types of crime, damage to infrastructure, impacts on groundwater and the unlikely possibility of co-existence of farming and mining.

Communication received from IAPs after review of EIA/EMP. Communication and contact details have been redacted in order to protect the privacy of IAP or for security reasons. Correspondence is presented as received with no correction of grammar and spelling.

Communication Received
From: Nicolene Coetzee, Farm Kanonschoot **Date: 04/08/2025**
Comment Thank you for you email and WhatsApp. Kindly provide me with the proposed 'land access agreement' for review?
Response Thank you for your mail. The surface access agreements are site and/or landowner specific and are only developed by the exploration company once they are granted the EPL, and if they determine that they actually want access to a specific farm. At this stage, the Ministry of Mines and Energy only expressed their intention to award the EPL to Votorantim, on condition that they complete the environmental assessment process and obtain an environmental clearance certificate. They are thus not the "owners" of the EPL yet. Therefore, no surface access agreements would have been drafted by Votorantim for EPL 10042. Do not hesitate to contact me for any additional information or clarifications.
From: Nicolene Coetzee, Farm Kanonschoot **Date: 05/08/2025**
Comment Thank you for your reply. Till date, no appointment has been requested from Geo Pollution Technologies (Pty) Ltd to actually visit/inspect the farm. Kindly advise?
Response My colleague, Quzette Bosman, made numerous attempts to engage with you and your dad regarding the EIA process. Unfortunately you/your dad did not answer/speak to her and the whatsapps she sent went largely unanswered. In April we understood that your father needed an operation and hence he requested that we make contact with yourself. Which we did. All parties were then again notified about the proposed site visit and a further opportunity to engage with the project team, which took place in May 2025. We made an effort to be available for all the farmers and I had very good meetings with those farmers who indicated that they would like to meet me. Some of them originally did not want to meet, but eventually changed their minds. Once we met, they told me that they were very glad that they decided to meet, as they now understood the whole process much better. After the site visits, Quzette also offered to meet your father in Windhoek, but this again went unanswered. We were also informed that you were arranging a meeting among yourselves with Mr Wilkens and Mrs Glowani. As another attempt to reach out we also explained to Mr Wilkens that we will be in the area for the site visit and wish to meet. In other words, a week before the site visit as well as the day before the site visit, we reached out to parties who did not respond. Quzette also emailed and stated that you will be missing out on information / an overall understanding of the process due to not wanting to engage in a telephonic or in person meeting. The same personal call which was afforded to every farmer in the area. Understandably, one can only spend so much time trying to engage with interested and affected parties, and if it becomes clear that such parties show no interest in reciprocating effort, one stops—because persistence without reciprocity is not only unproductive, but also unsustainable. As to your current interest in us visiting your farm, we no longer have time or scope to conduct another site visit. Having said that, due to the size of the EPL, and the fact that the nature of the proposed exploration activities are largely non-invasive, there is no explicit need to visit all farms and, it is also quite frankly impossible to visit all areas of all farms. That is also why we engage with farm owners prior to the site visit, so that they can point out any specific sensitivities that need to be considered, and possibly visited, as part of the assessment. During my site visit I did get a good understanding of the environment within which the EPL is located, and also of the concerns shared by most farm owners I have met. I trust that these have been adequately addressed in the report. You remain welcome to send me information on any specific sensitivities on your farms for inclusion in the report. You can also substantiate these with photographs if you have any. But please send such information by 18 August 2025 to ensure it is included in the final report to be submitted to the Ministry.

From: Pieter Hough, Farm Nuwe Orde and Farm The Mark **Date: 04/08/2025**
Comment Thank you for the communication provided and the update it brings. Our interest would be in the affect on farm Nuwe Orde (826) and our neighbor - The Mark (132). The first property is dissected by a section of the gravel road C26, a road which one would assume would be the main access road to be used by parties during exploration.
Response Your area of interest is noted. Depending on which areas of the EPL the Proponent want to focus on, they may use other roads, but it is likely that they will use the C26 as well.
Comment I would assume that the required Public Consultation Process would be the next step you are entering into? From the mail below it would appear that us, contacting your offices / and or representative, in order to be included in communication - has been deemed as the extend of your public consultation process? Please clarify?
Response The public consultation process has been initiated in March 2025 and is still ongoing. Your registration for the EIA process via email on 19 May 2025 has already established you as IAP. Public participation remains ongoing up to and beyond the time of submission of the ECC application, which is planned for the latter part of August. Any comments, input, etc., yet to be received will be included and addressed in the final EIA to be submitted to the Ministry.
Comment The following more pertinent points will need to clarified - Due to the high traffic, risk and exposure of specifically - Nuwe Orde - which as mentioned above is adjacent to the road, most of the property is locked. You will thus only be allowed onto this farm section when we are on the farm in question. Thus by appointment, as we have business's in Windhoek, we would need a schedule set up in advance and this would mostly be over weekends.
Response Whenever the Proponent requires access to privately owned land, they must make prior arrangements with the land owner, and reach a surface access agreement with the land owner, which will stipulate the requirements for arranging and gaining access. At no time may they go onto privately owned land to conduct any form of exploration without prior arrangement. Please see section 9.1.1.4 on page 38 of 68 of the EIA shared via the download link in our previous mail.
Comment We will not allow any smoking on the property, nor will any drilling be allowed without firefighting equipment and third party insurance to cover the risk to property and livestock - be that due to process or negligence.
Response Such stipulations will form part of the surface access agreement to be reached between the land owner and the exploration team. Also refer to section 9.1.11 on page 53 of 68 of the EIA. Additional requirements from the land owner is to be discussed with the exploration team and included in the surface access agreement.
Comment I am keen to understand how aerial exploration will be done without risking damage to the animals within enclosed game camps? What processes will be in place to mitigate and compensate the owners of these animals - be that due to process or negligence. I am sure more questions/ clarification will be forthcoming.
Response Should aerial surveys be contemplated for this EPL, it has to be included in the surface access agreement. Sensitive areas to be avoided can then be highlighted in the agreement. Areas with high density of game, and especially where such game is in game camps increasing risk of injury, aerial surveys are mostly avoided. Flying at higher altitudes or flying with fixed wing drones, which are much less noisy, are also ways of limiting impacts. See section 9.1.10 on page 51 of 68 of the EIA.
From: Nicolene Coetzee, Farm Kanonschoot **Date: 18/08/2025**

Re: EPL10042: Proposed Exploration and Prospecting: Farm Kanonschoot no.131

I hereby acknowledge receipt of your (Ms. Bosman) WhatsApp message on Friday, 1 August 2025 and your (Mr. Faul) email on Tue 05 August 2025.

Comment 1

1. No correspondence/communication prior IAP registration

Reference: Environmental Assessment Scoping Report: 8. PUBLIC CONSULTATION (pg.35 of 68)

1.1 Geo Pollution Technologies (Pty) Ltd experienced difficulty identifying the land owners affected by EPL10042 and struggled to get the contact details of those successfully identified.

I find this hard to believe, as there are many different sources from which the above-mentioned could have been obtained. Furthermore, I have not received any correspondence from Geo Pollution Technologies (Pty) Ltd prior the email sent upon registration of myself as an IAP (interested and affected party). This email was sent on Tuesday, 20 May 2025.

I also sense that, for those who have been contacted post IAP registration, Geo Pollution Technologies (Pty) Ltd prefers private/individual/telephonic consultations, rather than community-based meetings. Some IAPs have till date not received site visits.

With this said, I am not sure which part of farm Kanonschoot no.131 is included in the EPL10042, as the map is very small and not very clear. Kindly advise?

Response 1

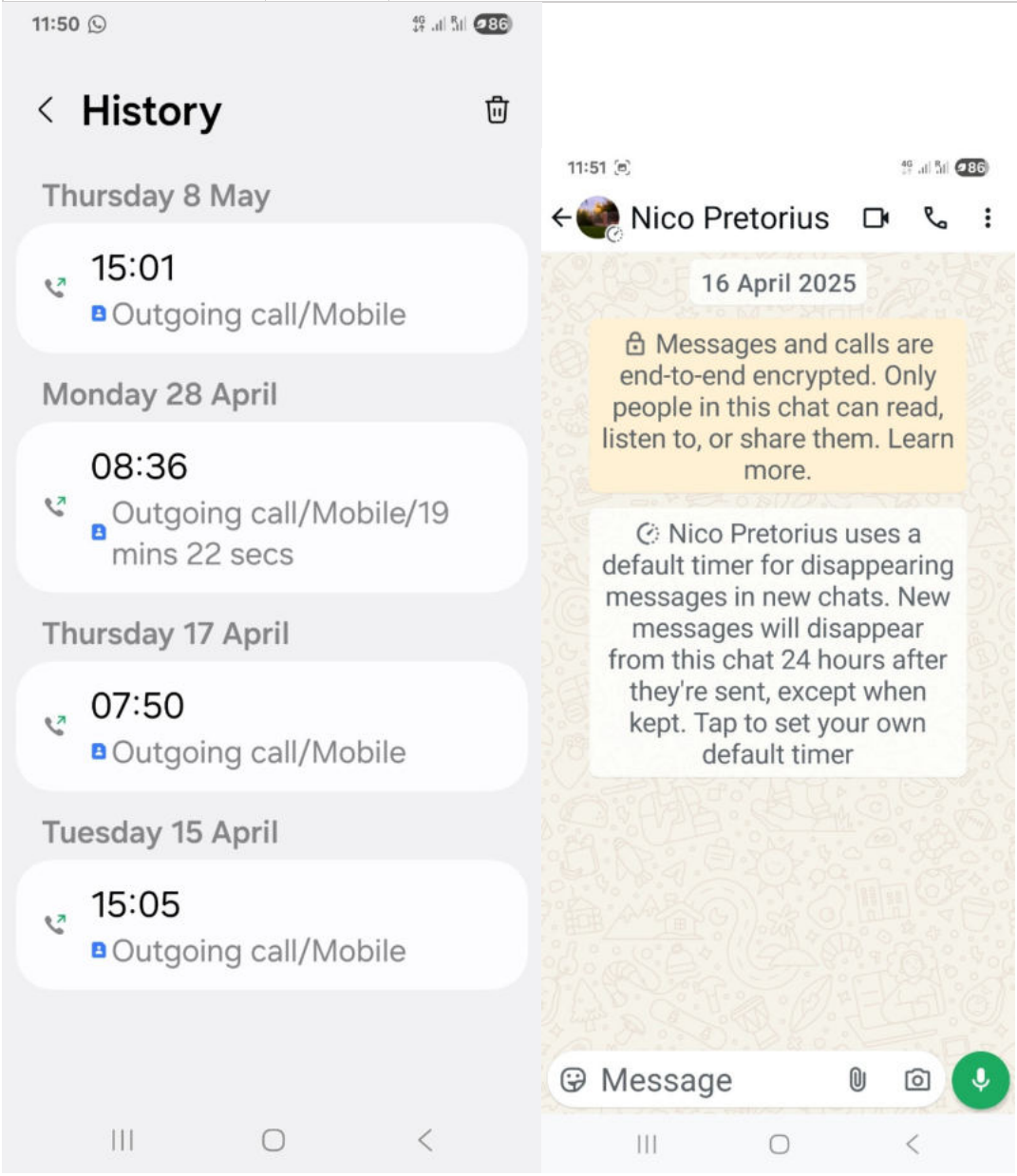
We note your reservation with regard to our expression of the difficulty in getting contact details of farm owners. We have however worked on numerous EIAs within, or surrounded by farms, many for farmers themselves. In general, people are understandably reluctant to give contact details of neighbours or acquaintances to people/companies they do not know. We have seen that many environmental assessment practitioners (EAPs) simply obtain postal addresses from the deeds office and send once off notifications by registered mail to land owners. A method of public consultation that is not used by us as it is ineffective and not in the spirit of proper public consultation. That is why we prefer to personally contact each land owner, so that we can have a frank and open discussion with each to ensure an understanding of what it is we do and your right as an interested and affected party. This way we can also get more specific details about each farm, directly from the farm owner, which may not have been shared at a public meeting.

GPT has been trying to contact the owners of Nuwe Orde and Kononschoot since April. The land line numbers listed does not work or is the wrong number. It was gleaned from the community that Mr Pretorius is managing the farm. The mobile number was obtained for Mr Pretorius. Numerous attempts were made to contact him. In April a conversation was held with him during which time he mentioned that he was very ill and could not tend to the matter, but that he will send the information to his daughter who will then contact us. Since no contact was made by the time of the site visit Mr Pretorius was again contacted to no avail. All landowners were invited to meet with GPT and GPT offered to travel to their homes for such meetings. During this time, another neighbour of Mr Pretorius confirmed that three farmers are considering having a meeting with us together and that the daughter of Mr Pretorius will contact GPT in this regard. No contact was received and we had no details for this person to follow-up with. When following up with the neighbour it was confirmed that they will contact us when they have arranged among themselves. This was communicated to GPT on 08 May 2025. First contact from Mr Pretorius's representatives was in late May.

The following is a summary of the contact and action dates for reaching Mr Pretorius (Nuwe Orde: and Kanonschoot) which typically are for GPTs internal use only.

Contact	Date	Time called	Call ended	Notes
N Pretorius - Nuwe Orde - 18 -	15/04/2025	3:07 pm	3:07 pm	Not reachable
N Pretorius - Nuwe Orde - 18 -	16/04/2025	12:05 pm	12:05 pm	Wrong number
N Pretorius - Kanonschoot - 17 -	16/04/2025	12:06 pm	12:07 pm	Wrong number
N Pretorius - Nuwe Orde - 18 - 0811297060	16/04/2025	2:22 pm	2:23 pm	WhatsApp call - Ringing no answer (First Contact was made 16 April as per Call log and WhatsAPP screen._
N Pretorius - Nuwe Orde - 18 - 0811297060	17/04/2025	7:51 am	7:52 am	WhatsApp call - Ringing no answer - WhatsApp sent

N Pretorius - Nuwe Orde - 18 - 0811297060	28/04/2025	8:38 am	8:58 am	Called and messaged - in Windhoek currently and ill - speak to daughter. Daughter will do all. See Screenshot as per call length etc.).
N Pretorius - Nuwe Orde - 18 - 0811297060	08/05/2025	3:03 pm	3:04 pm	No Answer WhatsAPP sent
N Pretorius - Nuwe Orde - 18 -	08/05/2025	Wilkens - Nicolene will arrange to meet with you as part of a meeting		

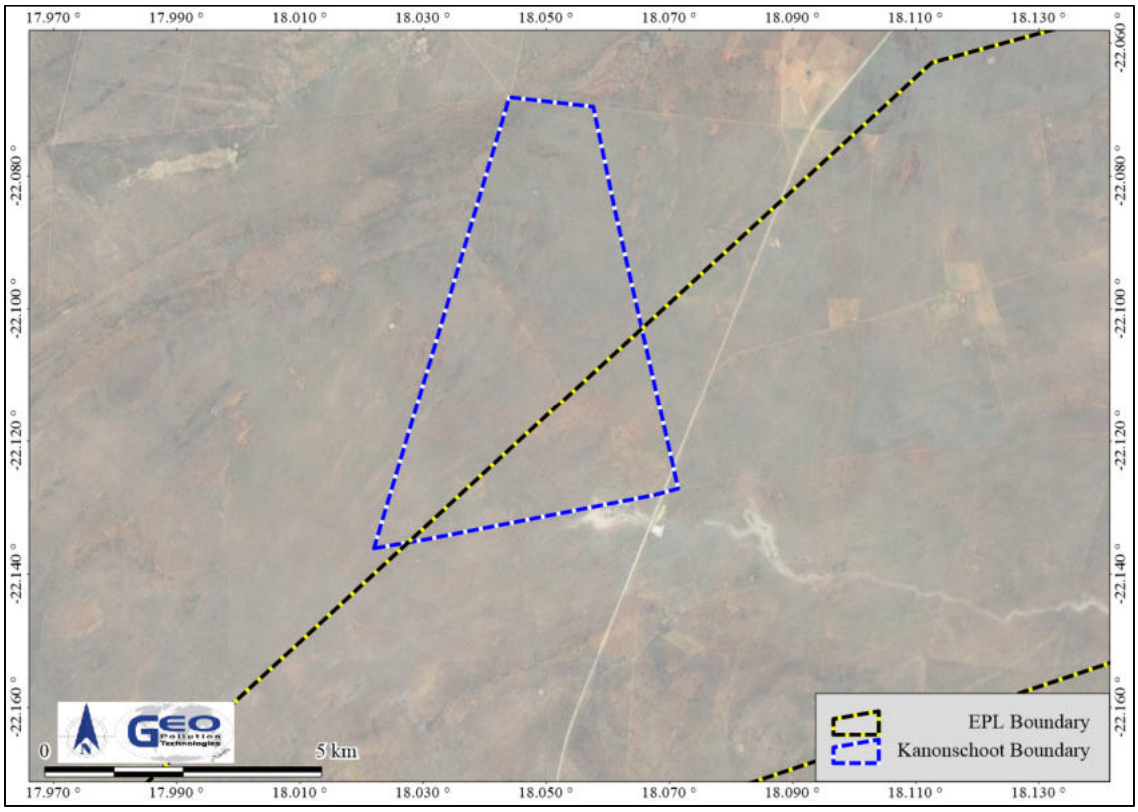


You are correct in inferring that we prefer "private/individual/telephonic consultations, rather than community-based meetings". Geo Pollution Technologies has been conducting environmental assessments for almost 25 years, starting well before the Environmental Management Act (EMA) was enforced in 2012. From experience we have learnt that public meetings are usually not a very useful tool for public consultation for such a farming community. Especially considering schedules and distances to be travelled. In addition, farming community members have different interests and while one neighbour may be opposing activities, the other neighbour would like to engage in providing accommodating etc. Such different views and subtle community dis-cohesion result in questions not being asked. Hence our strategy to rather focus on one on one meetings or conversations wherein

clarification questions may be asked and a good understanding of the project and process can be obtained. However, if there is merit for, or sufficient interest in, a public meeting, we usually do consider it. Also note that public meetings are in fact not a requirement of the Environmental Management Act it is a tool which can be used.

In response to your comment "Some IAPs have till date not received site visits", the following. Public consultation was conducted, just not a public meeting – which is not a legal requirement. We have tailored stakeholder engagement so as to speak to every farmer, each of whom was provided with the same information. In this way every farmer has the opportunity to ask questions and be provided with answers specific to their farm. This process takes almost 10 times as long as one public meeting. It is extensive and thorough. In addition all farmers were told about the site visit and were given the opportunity, if they wanted to, to further meet with us in person. Hence those parties who wanted to have a face to face meeting were given the opportunity. And neighbouring parties used that opportunity. IAPs were notified about this opportunity on the 7th of May 2025 about the site visit which was planned for the 13th and onwards. In addition, site notices were erected, newspaper notices ran for two consecutive weeks in two newspapers. The team has done much more in giving every land owner an opportunity to be informed about, and comment on, the project, than most other EPLs in the area. We can unfortunately not force any land owner to meet with us or provide access to their land. We will also not go onto private land without prior arrangement, unless access is to some extent "public" as is the case with for example lodges, tourism establishments or communal land. Thus, those IAPs we did not visit, are those who expressed no desire to meet with us during the site visit period.

The portion of Kanonschoot overlapped by the EPL is indicated in Figure7.2 in the EIA as being the south-eastern corner, constituting about a third of the farm area. Herewith a map of only Kanonschooot and the EPL area.



Comment 2

2. Exploration process and Environmental Assessment Scoping Report to be explained in detail

2.1 Although the Exploration and Environmental Assessment Scoping Report has been received, I prefer having this report discussed and explained in detail, in person. A meeting can be scheduled. Kindly confirm a suitable date and time?

Response 2

The report was provided with a non-technical summary. There is no legislation that obligates an EAP to explain and discuss the report with each IAP in person. Some EPLs overlap in excess of a hundred parcels of land. To explain everything in the EIA to each landowner in person would take months. That said, we are willing to meet with you at our offices in Windhoek. You can arrange a date and time with us. Take note however that the ECC

application will be submitted and will not be delayed by the proposed meeting, as all regulatory requirements were met in terms of the consultation process.

Comment 3

3. Who are the most affected/impacted parties/farms?

3.1 Please provide a list of the most affected/impacted parties as well as the scope of the exploration in these areas.

Response 3

This is not information that is currently available. As explained in my previous communication on 5 August 2025 as presented above, the EPL has not been awarded to the Proponent yet. As such, they have not conducted detailed studies on the EPL area to enable them to provide such a list at this stage. The steps of exploration as provided in the EIA report, is in the following order:

In some instances field surveys, geotechnical surveys and soil sampling may be in a different order or overlap. The main consideration however is that with each step, the area of interest becomes smaller. Therefore, the least intrusive steps are conducted first, and by the time they want to conduct drilling, their focus area will, in most cases, be much smaller than the EPL area. Some farms may even be excluded from prospecting after the literature review or remote sensing phases, or after the initial field and geophysical surveys and soil sampling. All three being low impact forms of exploration.

Comment 4.1 and 4.2

4. With regards to employment, the following:

4.1 Where do employees originate from?

4.2 Are employees vetted?

Response 4.1 and 4.2

Exploration does not typically require a large team. Votorantim has an existing, permanent employee base, with the team that will access farms for exploration, consisting of qualified geologists and field technicians (usually no more than about eight persons per team). New employees or contractors are interviewed, testimonials obtained and background screening conducted (e.g., police code of conducts).

They will only require unskilled labour if, for example, small-scale bush clearing is required to enable geophysical surveys. The people used for this purpose will be determined when the surface access agreement is negotiated. Some farmers prefer their own workers to be used while others prefer labourers from elsewhere to be used. Only if exploration reach the drilling stage, will drilling contractors are used who will have their own drilling teams. Such drilling, will require a new surface access agreement to be negotiated where the new requirements from the land owner are included. All staff receive training and induction of the company code of conduct, and therefore know the implications when there is a breach of the conduct (e.g., Disciplinary action for non-compliance). In the case of contractors on site, the same level of screening will take place. Inspections and supervision will be conducted by the Proponent's staff.

Comment 4.3

4.3 What is their period of employment with Geo Pollution Technologies (Pty) Ltd?

Response 4.3

Note that we are an independent environmental consulting firm and will not be involved with any exploration activities. The exploration team will all be employees of the exploration company, Votorantim Metals Namibia.

Comment 4.4

4.4 Do they have valid identification available, viz. ID and passport?

Response 4.4

All staff wear easily distinguishable uniforms with name tags that can be checked against the list of employees who will be present on the land provided to the land owner. Identification is a management measure included in the EMP and the individual farm owners' own requirements for identification can also be negotiated with the establishment of the surface access agreement.

Comment 4.5

4.5 Do they have clearance certificate(s) available?

Response 4.5

These are required before appointing any new employees and will be on file with the Proponent.

Comment 4.6

4.6 Are there payslips and contracts in place?

Response 4.6

Votorantim Metals Namibia (Pty) Ltd is a company registered with BIPA and in accordance with the laws of Namibia. All Labour Act requirements are strictly met inclusive of, for example, registration of employees with the Social Security Commission.

Comment 4.7

4.7 Will the same team work on the same land or are they distributed on a rotational basis?

Response 4.7

4.7 It is mostly the same team that will do all the work in a specific area. Although minor replacements of team members may be made due to illness or other unforeseen circumstances. Such changes will be communicated to the landowner in advance.

Comment 4.8 and 4.9

4.8 How familiar are you with the habits of these employees, viz. Smoking, alcohol, general hygiene

4.9 Have they been vaccinated/dewormed?

Response 4.8 and 4.9

As mentioned, the exploration team consists of geologists and field technicians of good social standing and not of an unknown, unskilled workforce. Furthermore, Votorantim Metals Namibia has very strict policies regarding unacceptable actions and behaviour with disciplinary procedures for non-compliance. For instances where unskilled labour is required, we suggest that land owners request that their own labourers are employed for short-term jobs to be performed.

Comment 4.10

4.10 Will an attendance register be kept up to date?

Response 4.10

This can be made a requirement of the surface access agreement if not already included when negotiations start.

Comment 4.11

4.11 How are the following issues addressed and dealt with, in the case of disobedience:

4.11.1 land roaming outside specified area

4.11.2 poaching

4.11.3 veld fires due to smoking, despite smokers not being permitted

Response 4.11

4.11.1 All staff obtain training and induction of the company code of conduct, and therefore know the implications when there is a breach of the conduct (e.g., disciplinary action for non-compliance, formal warnings and ultimately termination of employment within the legal parameters of Namibia). Furthermore, the employees strictly remain in their working area as indicated by a provided work schedule plan to the land owner. Employees are trained to conduct prospecting activities in specific areas at a given time, and are given instructions to respect the requests of the land owners. Prospecting will take place during day time as per time pre - arranged with the land owner (e.g., 6 am to 6 pm). Camping of Votorantim staff is discouraged on the farms. If a land owner does not want Votorantim staff to access an area during a certain time (e.g., due to hunting), this is respected. All staff wear easily distinguishable uniforms with name tags that can be checked against the provided list of employees who will be present on the land. To prevent unauthorised entry, temporary camp and drill sites must be fenced off.

4.11.2 If any evidence suggest staff members have engaged in poaching, the land owners can be compensated and the staff will receive disciplinary action. The company usually informs the land owner that we are committed in identifying any suspicious activities, like poaching.

4.11.3 All staff receive training and induction of the company code of conduct, and therefore know the implications when there is a breach of the conduct (e.g., disciplinary action for non-compliance). Furthermore, the company has a holistic fire protection and prevention plan. Refer to section 9.1.11 of the management plan.

Note: The EIA and EMP stipulates preventative and mitigating measures regarding security risks for the area (section 9.1.8). This is a legal document which binds the company with the government - the company is obligated to follow the guidelines within the document. When an agreement is signed with the land owner, the prospecting company is also obligated to adhere to protecting the interests and infrastructure and preventing loss of income of the land owner.

Comment 4.12 and 4.13

4.12 How are employees supplied with food and especially meat?

4.13 What mode of cooking is permitted?

Response 4.12 and 4.13

Votorantim Metals Namibia does not allow their employees to camp unless there is absolutely no other option available. They have a company policy that all employees, when away from home, stay in proper accommodation establishments providing meals. Therefore, they will only need lunch, water, cold drinks and maybe snacks, which will typically be provided by the company, or by the accommodation establishment in the morning before departing to the exploration site, or brought along from home. Given the availability of accommodation establishments not too far from the EPL, employees should be able to stay in the required lodgings. There will thus be no need for preparation of meals/cooking while in the field.

Comment 4.14

4.14 Water supply?

Response 4.14

All employees are provided with drinking water for the duration of their field work. If additional water is required for activities such as drilling, water is either sourced from, and in agreement with, the land owner or carted to the site in a mobile tank.

Comment 5

5. Employee accommodation:

5.1 Location of the base station?

5.2 Ablution and toilet facilities

5.3 Disposal of human waste

5.4 Who is responsible for general site cleanliness and maintenance thereof?

5.5 Water supply?

Response 5

See answer 4.12 to 4.14 above. Should drilling be conducted, drill teams will still reside off-site where possible, but temporary portable toilets and trashcans will be placed at the drill site, the contents of which will be removed for disposal at a pre-determined site (off-site at a registered wastewater treatment plant and landfill or in a landowners septic tank or landfill if so agreed upon). The Proponent is at all times responsible for site cleanliness and management of all areas accessed.

Comment 6

6. What are the measures in place for the protection of fauna and flora?

6.1 Is exploration permitted in areas of endangered fauna and flora?

6.2 If so, what measures are taken for the protection thereof?

Response 6

6.1 This is a slightly complex question that cannot simply be answered with yes or no. It will depend on the species in question. This is perhaps better explained with examples. Are they allowed to do exploration on a farm that has brown hyenas? The answer is yes, but with vigilance as not to directly interfere with them. Are they allowed to, for example, create a drill pad on or near a brown hyena den? The answer is a definite no. Are they allowed to remove a protected camel thorn tree to create a drill pad. Yes, with a valid permit from the Directorate of Forestry and only if no other option exists. Are they allowed to remove a tree, protected or not, with for example a vulture nest? A definite no.

6.2 It would firstly be proactive from the landowner's side to indicate all ecologically sensitive areas during the negotiation phase of the surface access agreement or prior to any form of intrusive prospecting such as geophysical surveys that may require some bush clearing, or drilling. Secondly the management plan stipulates various preventative and mitigation measures aimed at the protection of the environment. This management plan becomes a legal document that the Proponent must adhere to.

Comment 7

7. Disturbance to livestock and game in confined areas

7.1 Is exploration permitted in area where livestock and game are in confined spaces?

7.2 If so, what measures are taken for the protection of their well-being?

Response 7

The Minerals (Prospecting and Mining) Act 33 of 1992 establishes the following compulsory requirements:

Clause 52. (1) The holder of a mineral licence shall not exercise any rights conferred upon such holder by this Act or under any terms and conditions of such mineral licence –

(d) in, on or under any private or State land -

(i) used as a garden, orchard, vineyard, nursery, plantation or which is otherwise under cultivation;

(ii) within a horizontal distance of 100 metres of any spring, well, borehole, reservoir, dam, dipping-tank, waterworks, perennial stream or pan, artificially constructed watercourse, kraal, building or any structure of whatever nature;

(iii) within a horizontal distance of 300 metres from any point on the nearest boundary of any erf, as defined in section 1 of the Townships and Division of Land Ordinance, 1963 (Ordinance 11 of 1963), if such erf has been surveyed for the purpose of inclusion in a township as defined in that section; or

(iv) on which accessory works were erected or constructed under this Act and which existed at the time of the issue of the mineral licence in question, without the prior permission in writing of the owner of such land, and, in the case of land referred to in subparagraph (iv), of the holder of a mineral licence who has erected or constructed such accessory works on which it is proposed to exercise such right;

Apart from the above, save for drilling or aerial surveys, exploration is non-intrusive and unlikely to cause harm to livestock or wildlife.

Comment 8.1

8. Traffic

8.1 Aerial traffic:

In the case of injured livestock and/or game, due to low-flying aircrafts and/or drones for aerial surveys, who is responsible for the repair of infrastructure and what compensation is in place for the losses incurred?

Response 8.1

Any damage or loss resulting directly from the actions of the exploration team must be repaired or replaced at the expense of the exploration company. Stipulations to this effect should be included in the surface access agreement. The likelihood of aerial surveys being conducted for this EPL is low. The exploration team also avoids areas with high game densities when conducting aerial surveys.

Comment 8.2

8.2 Road traffic:

8.2.1 A list is to be provided of all vehicles to be used during exploration. It should be clearly identifiable, with valid licence plates and registration documents available.

8.2.2 What traffic is expected to pass through entry gates and who is to monitor these movements?

8.2.3 Will there be a daily report in this regard?

8.2.4 How and where is fuel stored for these vehicles and how is the fuel supplied?

Response 8.2

The requirement for the provision of a list of vehicles can be stipulated as part of the surface access agreement. All the Proponent's vehicles are clearly branded, roadworthy, and tracked by their head-office via satellite tracking to ensure they remain within demarcated areas of work and within set speed limits, etc. For exploration activities, exclusive of drilling, the entire team will be transported in not more than four vehicles. If drilling is performed there will be the obvious drill rig and supply vehicle. The Proponent can be required to, as part of the surface access agreement, provide a schedule of times they will access the farm, number of vehicles, number, names and identity numbers of all staff who will be present, etc. A daily report can also be stipulated as a requirement.

The Proponent's vehicles are fitted with long range fuel tanks and no fuel will be required for field surveys, geophysical surveys and geochemical sampling. Only if drilling is performed, fuel will be required. This will be transported to the site in mobile tanks or a bowser. Drip trays are specified in the management plan as a requirement when any refuelling takes place.

Comment 9

9. Access

9.1 All entry gates to farm Kanonschoot no.131 are permanently locked. Access is allowed on permission by myself ONLY. No employee and/or other person, is allowed to grant access.

Response 9

Noted. This is standard procedure by the Proponent to arrange all access with the land owner or his/her designated contact person.

Comment 10

10. Land access agreement

Kindly provide me with a draft of the land access agreement for the mentioned property?

Response 10

As explained previously, surface (land) access agreements are tailored for each specific area or farm. Since the EPL has not officially been awarded to the Proponent yet, they have not prepared surface access agreements for the farms in this EPL. These will only be prepared for a specific farm if they are ultimately awarded the EPL and then only if they intend to visit that specific farm.

These are some issues I would like to address and have discussed in detail.

Kindly confirm receipt and for any enquiries, please do not hesitate to contact me.

From: Marina Lamprecht, Farm Rooikraal Game Ranch

Dated: 18/08/2025

Comment

PROPOSED MINING PROSPECTING

I wish to bring the following to your attention regarding my farm, Rooikraal Game Ranch 1020, Omitara.

This is a dedicated wildlife area. As such I have received international recognition for our successful conservation initiatives, including a joint-award with Her Excellency, Dr Nandi- Ndaitwah, in Nuremberg during her term as Minister of Environment and Tourism.

We have absolute respect for predators as part of the 'circle of life' and therefore have a large population of these endangered animals, and work closely with the Cheetah Conservation Fund. They have released numerous threatened Leopard and Cheetah, from livestock farms onto my land, as we are considered to be a sanctuary for them. The range of hills on your map has numerous caves and is therefore heavily populated with Leopard.

We currently have numerous rare, endangered and/or vulnerable species living wild and free on the farm, as we have no interior fences or camps, but only a perimeter fence on the border of the land - the entire farm is therefore a game camp. I have numerous 'crawl holes' under our fence in order to make it easy for any animals under pressure to enter the farm. Over the years I have noted many new species which have gravitated towards the farm when threatened or under pressure in neighbouring areas.

In addition to the great number and variety of fauna and flora on the farm, we have the following regularly seen species of rare, endangered and vulnerable animals, which we have either introduced over the years or which occur historically, including:

8 x species of Mammals (I prefer not to list, for security purposes)

7 x species of Birds
3 x species of Snakes
2 x species of Reptiles
3 x species of Tortoises.
As well as numerous rare plants.

Over the years we have found a number of relics of the genocide, which leads me to believe that there might well be graves as well. Out of respect for the fallen victims, we have never investigated further.

We also host international safari guests throughout the year, who we guarantee the exclusive access to our lodge facilities as well as the entire farm. We also guarantee an organic environment. Having any form of mining activity on the farm would therefore put us out of business.

Taking the above into consideration, we respectfully request that farm Rooikraal 1020 is removed from all prospective mining activity lists.

Response

The concerns raised and information provided are noted and included for consideration by the Ministry of Environment, Forestry and Tourism. It was also communicated to the Proponent for their consideration. It should be noted that exploration is not at all as invasive as mining, with access being required only for a short period of time, by a few people, and only when it suits the land owner (i.e. when there are no guests for example). Exploration does not guarantee that a mine will result. In the vast majority of cases, exploration actually confirms that there are no viable mining resources.

From: Harald Grabowsky Farm Fulma
Dated: 18/08/2025

Comment

IAP's EPL10042

* private/individual/telephonic consultations, rather than public/community/in person consultation(s) were done. Some I&APs' sites have till date, still not been inspected/visited.

Response

Please see response 1 to the same query by Ms. Nicolene Coetzee above.

Comment

* exploration process and report to be explained in detail.

Response

Please see response 2 to the same query by Ms. Nicolene Coetzee above.

Comment

* who are the most affected/impacted parties/farms.

Response 3

Please see response 3 to the same query by Ms. Nicolene Coetzee above.

Comment

* what is the scope of the exploration.

Response

Please refer to Section 4 of the report and the previous response explaining the exploration steps.

Comment

* employees: origin, vetted, period of employment, valid identification (ID and/or passport), availability of clearance certificate(s), payslips and contracts, health certificate(s), same team daily or on rotation basis, habits (smoking, alcohol use), attendance, consequences for land roaming, poaching, grnetal security/crime.

Response

Please see response 4.1 to 4.14 to the same query by Ms. Nicolene Coetzee above.

Comment

* accommodation: base location, ablution facilities, disposal of human waste, cooking, food supply.

Response Please see response 4.12, 4.13 and 5 to the same queries by Ms. Nicolene Coetzee above.
Comment * measures for the protection of endangered fauna & flora.
Response Please see response 6 to the same query by Ms. Nicolene Coetzee above.
Comment * water supply.
Response Please see Response 4.14 to the same query by Ms. Nicolene Coetzee above.
Comment * disturbance to game in confined areas/game proof camps
Response Please see Response 7 to the same query by Ms. Nicolene Coetzee above.
Comment * aerial traffic
Response See Response 8 to the same query by Ms. Nicolene Coetzee above.
Comment * land access agreement
Response See Response 10 to the same query by Ms. Nicolene Coetzee above.
From: Private **Dated: 18/08/2025**
An email was received regarding sensitive information pertaining to the EPL area that, for security reasons, cannot be made public. Since the report is ultimately shared with the public, it was decided not to include the correspondence in the report. The entity providing the information was contacted to inform them of this action and receive their approval not to include it, but only share the information directly with MEFT. No feedback was however received and it was decided to continue with this approach.

From: Dr Laurie Marker, Cheetah Conservation Fund
Dated: 19/08/2025

Comment

30 YEARS Cheetah CONSERVATION FUND
P.O. Box 1755, Otjiwarongo, Namibia
Tel: (+264) (0) 67 304806, Fax: (+264) (0) 67 304430

19 August 2025

TO WHOM IT MAY CONCERN

Subject: Formal Objection to the Planned Development on Farm Rooikraal

This letter serves to formally raise an objection to the proposed mining development on **Farm Rooikraal Game Ranch #1023**. Farm Rooikraal is a conservation area that has been dedicated to the rewilding of cheetahs (*Acinonyx jubatus*) trapped in human-wildlife conflict incidents, as well as the rewilding of young trapped leopards by the Ministry of Environment, Forestry and Tourism (MEFT) in cooperation with the Cheetah Conservation Fund (CCF). The cheetah is a globally vulnerable species and one of Namibia's most iconic wildlife treasures.

In addition, an environmental education center is in the planning phase on Rooikraal Game Ranch. This center will cater for schoolchildren in the Omaheke Region.

The planned prospecting and potential mining development threatens to undermine years of conservation investment and success. Specifically:

1. **Biodiversity and Conservation Value:**

   Farm Rooikraal is not just a private piece of land but part of a broader ecological network. It provides essential habitat for cheetahs and other wildlife, ensuring their survival outside of captivity. Any mining activities will fragment this habitat, reduce available prey, and increase the risk of human-wildlife conflict.

2. **Contradiction of National and International Commitments:**

   Namibia has gained worldwide recognition for its progressive conservation policies and is a signatory to international conventions such as CITES and the Convention on Biological Diversity. Allowing a development of this nature in a conservation-designated area would contradict both the **National Policy on Human–Wildlife Conflict Management** and Namibia's obligations under international law.

3. **Tourism and Economic Value:**

   Conservation-based tourism is one of Namibia's most valuable industries. Cheetahs are a keystone species that attract visitors globally. Protecting their habitat directly

30 YEARS Cheetah CONSERVATION FUND
P.O. Box 1755, Otjiwarongo, Namibia
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contributes to sustainable tourism revenues, community empowerment, and Namibia's reputation as a conservation leader.

4. **Public Interest and Precedent:**
   Approving development on Farm Rooikraal would set a dangerous precedent, where protected or private conservation-dedicated areas can be compromised for short-term economic gain. This would weaken public confidence in Namibia's conservation framework.

The conservation status of Farm Rooikraal should be upheld and strengthened as a sanctuary for cheetahs and other wildlife, ensuring that development does not come at the expense of irreplaceable biodiversity to prevent similar threats in the future.

Dr Laurie Marker
Founder/Executive Director
Cheetah Conservation Fund

Response

The comments and motivations why mining should not be allowed is well received and communicated to the Proponent and to the Ministry of Environment, Forestry and Tourism who will ultimately make the decision. From a conservation perspective it is agreed that where proven conservation efforts are ongoing, especially related to vulnerable and threatened species, intrusive mining activities should be avoided and where prospecting is allowed to get a better understadning of the geology of the larger area beyond the farm, it should be with the necessary precautions.

Appendix C: Consultant's Curriculum Vitae

ENVIRONMENTAL SCIENTIST **André Faul**

André entered the environmental assessment profession at the beginning of 2013 and since then has worked on more than 240 environmental impact assessments including assessments of the petroleum industry, harbour expansions, irrigation schemes, township establishment and power generation and transmission. André's post graduate studies focussed on zoological and ecological sciences and he holds a M.Sc. in Conservation Ecology and a Ph.D. in Medical Bioscience. His expertise is in ecotoxicological related studies focussing specifically on endocrine disrupting chemicals. His Ph.D. thesis title was The Assessment of Namibian Water Resources for Endocrine Disruptors. Before joining the environmental assessment profession he worked for 12 years in the Environmental Section of the Department of Biological Sciences at the University of Namibia, first as laboratory technician and then as lecturer in biological and ecological sciences.

CURRICULUM VITAE ANDRÉ FAUL

Name of Firm	:	Geo Pollution Technologies (Pty) Ltd.
Name of Staff	:	ANDRÉ FAUL
Profession	:	Environmental Scientist
Years' Experience	:	24
Nationality	:	Namibian
Position	:	Environmental Scientist
Specialisation	:	Environmental Toxicology
Languages	:	Afrikaans – speaking, reading, writing – excellent
		English – speaking, reading, writing – excellent

EDUCATION AND PROFESSIONAL STATUS:

B.Sc. Zoology	:	University of Stellenbosch, 1999
B.Sc. (Hons.) Zoology	:	University of Stellenbosch, 2000
M.Sc. (Conservation Ecology)	:	University of Stellenbosch, 2005
Ph.D. (Medical Bioscience)	:	University of the Western Cape, 2018

First Aid Class A	EMTSS, 2017; OHS-Med 2022
Basic Fire Fighting	EMTSS, 2017; OHS-Med 2022

PROFESSIONAL SOCIETY AFFILIATION:
Environmental Assessment Professionals of Namibia (Practitioner)

AREAS OF EXPERTISE:
Knowledge and expertise in:
- Environmental Assessment and Environmental Management Plans
- Water Sampling, Extractions and Analysis
- Biomonitoring and Bioassays
- Biodiversity Assessment
- Toxicology
- Restoration Ecology

EMPLOYMENT:

2013-Date	:	Geo Pollution Technologies – Environmental Scientist
2005-2012	:	Lecturer, University of Namibia
2001-2004	:	Laboratory Technician, University of Namibia

PUBLICATIONS:

Publications:	5
Contract Reports	+240
Research Reports & Manuals:	5
Conference Presentations:	1