



Excel Dynamic Solutions (Pty) Ltd

ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROSPECTING AND EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) No. 9779 LOCATED EAST OF OTWANI, IN KUNENE REGION, NAMIBIA.

ENVIRONMENTAL ASSESSMENT REPORT: Final

ECC Application Reference: APP- 006867

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EXECUTIVE SUMMARY

Libra Seventy-One Investments (Pty) Ltd (The Proponent) has applied to the Ministry of Environment, Forestry and Tourism (MEFT) to be granted an Environmental Clearance Certificate (ECC) for the Exclusive Prospecting License (EPL) No. 9779. Excel Dynamic Solutions (Pty) Ltd (The Consultant) was appointed to act on behalf of the proponent in obtaining the ECC. The EPL covers a total surface area of 16,752.0323 hectares (ha), located approximately east of Otwani, Kunene region as shown in **(Figure 1)**. The EPL overlaps the Okatjandja kozomenje, Okangundumba and Ombujokanguindi conservancies. The target commodities for the prospecting and exploration activities are **Base & Rare Metals, Dimension stone, Industrial Minerals, Nuclear Fuel Minerals and Precious Metals**.

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

The application for the ECC was compiled and submitted to the competent authority (Ministry of Environment, Forestry and Tourism (MEFT)) as the environmental custodian for project registration purposes. Upon submission of an Environmental Scoping Assessment (ESA) Report and Draft Environmental Management Plan (EMP), an ECC for the proposed project may be considered by the Environmental Commissioner at the MET's Department of Environmental Affairs (DEA).

This Environmental Scoping Assessment (ESA) has been prepared for the proposed prospecting and exploration activities on Exclusive Prospecting License (EPL) No. 9779, located east of Otwani in the Kunene region. The EPL covers an area where conservancy boundaries meet that is characterised by arid savanna vegetation, limited water resources, and communal land uses.

The purpose of the ESA is to evaluate the potential environmental and social impacts of the planned exploration activities, identify mitigation measures, and provide recommendations to support decision-making by the Ministry of Environment, Forestry and Tourism (MEFT) with respect to the granting of an Environmental Clearance Certificate (ECC).

The proposed activities will be conducted in three phases: non-invasive prospecting (geological mapping, geochemical sampling, and geophysical surveys), invasive exploration (drilling, trenching, and bulk sampling), and eventual decommissioning of exploration sites. These activities are expected to generate both positive and negative impacts.

Key **negative impacts** identified include: Potential restriction of access to mineral resources for small-scale miners, temporary disturbance of grazing areas, soil erosion, biodiversity loss, water resource use and potential contamination, dust generation, noise and vibrations, waste generation, and risks to community health and safety. Heritage and cultural sites may also be at risk if chance finds occur. Cumulative impacts are likely due to overlaps with livestock farming, conservation activities.

The assessment also recognizes significant positive impacts, including the creation of employment opportunities (both skilled and unskilled), local procurement of goods and services, skills transfer, stimulation of local businesses, and potential long-term investment in the Kunene Region if exploration proves successful.

The ESA recommends strict compliance with Namibia's environmental and mining legislation, including the Environmental Management Act (2007), EIA Regulations (2012), Minerals (Prospecting and Mining) Act (1992), Water Resources Management Act (2013), and the Nature Conservation Ordinance (1975). It further recommends adherence to the accompanying Environmental Management Plan (EMP), which provides detailed mitigation and monitoring measures for identified impacts.

Stakeholder consultations were undertaken through public notices, information sharing, and meetings held with communities within the Okatjandja kozomenje, Okangundumba and Ombujokanguindi conservancies. The main issue raised was community members expressing concern that the granting of an EPL limits opportunities for small-scale miners, as EPL holders are often unwilling to grant consent for small-scale mining activities within the boundaries of the EPL. This concern does not constitute a direct biophysical environmental impact, but rather relates to a potential socio-economic issue associated with livelihoods dependent on small-scale mining activities. The matter further pertains to statutory access, consultation, and consent requirements in terms of the Minerals (Prospecting and Mining) Act, 1992. Nevertheless, the concern is acknowledged as a relevant socio-economic consideration arising from community perceptions and the potential livelihood implications associated with the proposed EPL application area.

Brief Project Description

Planned Activities: Proposed Exploration Methods

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

1. Non-invasive Techniques:

- **Desktop Study: Geological mapping:** Mainly entails a desktop review of existing geological maps and ground observations. This includes the review of geological maps of the area and on-site ground traverses and observations and an update where relevant, of the information obtained during previous geological studies of the area and aero-geophysics survey.
- **Lithology geochemical surveys:** Stream sediment. Soil, and rock samples shall be collected and taken for trace element analysis to be conducted by analytical chemistry laboratories to determine if enough target commodities are present. Also, trenches or pits may be dug depending on the commodity (in a controlled environment e.g., fencing off and labelling activity sites) adopting a manual or excavator to further investigate the mineral potential. Stream sampling of all first-order drainages is undertaken by collecting a 1kg sample of the sediment within the active drainage channel. Soil sampling consists of small pits being dug where 1kg samples can be extracted and sieved to collect 50g of material. As necessary, and to ensure adequate risk mitigations, all major excavations will both be opened and closed immediately after obtaining the needed samples or the sites will be secured until the trenches or pits are closed. At all times, the land owners and other relevant stakeholders will be engaged to obtain authorization where necessary.
- **Geophysical surveys:** This will entail data collection by specialist contractors to investigate the substrata by airborne or ground methods, through sensors such as radar, radiometric, magnetic, and electromagnetic to detect any anomalies in the area related to mineralization. Ground geophysical surveys shall be conducted, where necessary using vehicle-mounted sensors or handheld by staff members, while in the case of air surveys, the sensors will be mounted to an aircraft, which then flies over the target area.

2. Invasive Techniques:

- **Detailed Exploration Drilling (Invasive Techniques):** Should analyses by an analytical laboratory be positive, holes are drilled, and drill samples collected for further analysis. This will determine the depth of the potential mineralization. If necessary new access tracks to the drill sites will be created and drill pads will be cleared on which to set up the rig. Two widely used drilling options may be adopted, these are either Reverse Circulation (RC) drilling and/or diamond drilling. RC drilling uses a pneumatic hammer, which drives a rotating tungsten-steel bit. The technique produces an uncontaminated large-volume sample, which is comprised of rock chips. It is relatively quicker and cheaper when compared to other techniques like Diamond Drilling. However, diamond drilling may also be considered for this exploration program, for better geological control and to perform processing trials. A typical drilling site will consist of a drill-rig, and support vehicles as well as a drill core and geological samples store. A drill core equipment parking and maintenance yard may be set up (including a fuel and lubricants storage facility).

Public Consultation

Public Consultation Activities

Regulation 21 of the EIA Regulations details steps to be taken during a public consultation process and these have been used in guiding this process. The public consultation process assisted the Environmental Consultant in identifying all potential impacts and aided in the process of identifying possible mitigation measures and alternatives to certain project activities. The communication with I&APs about the proposed prospecting and exploration activities was done through the following means in this order to ensure that the public is notified and allowed to comment on the proposed project:

- A Background Information Document (BID) containing information about the proposed exploration activities was compiled and emailed upon request to all registered Interested and Affected Parties (I&APs).
- Project Environmental Assessment notices were published in New Era Newspaper (**18 August 2025 and 25 August 2025**), and The Namibian Newspaper (**15 August 2025 and 22 August 2025**), briefly explaining the activity and its locality, inviting members of the public to register as I&APs and submit their comments/concerns.
- Consultation meeting was scheduled and held at Opuwo-Rural Constituency Office, on the 27th October 2025 at 10h00. The issues and concern raised were noted and used to form the basis for the ESA Report and EMP.

Potential Impacts identified

The following potential impacts are anticipated:

- **Positive impacts:** Socio-economic development through employment creation, women empowerment (primary, secondary, and tertiary employment) and skills transfer; opens up other investment opportunities and infrastructure-related development benefits; Produces a trained workforce and small businesses that can serve communities and may initiate related businesses; Boosts the local economic growth and regional economic development and; Increased support for local businesses through the procurement of consumable items such as Personal Protective Equipment (PPE), machinery spare parts, lubricants and basic consumables.
- **Negative impacts:** Potential restriction of access to mineral resources for small-scale miners; Potential disturbance of existing pastoral systems; Physical land/soil disturbance; Impact on local biodiversity (fauna and flora); Habitat disturbance. Potential impact on water resources and soils particularly due to pollution; Air quality issue: potential dust generated from the project; Potential occupational health and safety risks, Vehicular traffic safety and impact on services infrastructures such as local roads, Vibrations, and noise associated with drilling activities may be a nuisance to locals; Environmental pollution (solid waste and wastewater), Archaeological and heritage impact and Potential social nuisance and conflicts (theft, damage to properties, etc.).

The potential negative impacts were assessed, and mitigation measures were provided accordingly.

CONCLUSIONS AND RECOMMENDATIONS

Conclusions

The potential impacts that are anticipated from the proposed project activities were identified, described, and assessed. For the significant adverse (negative) impacts with a medium rating, appropriate management, and mitigation measures were recommended for implementation by the Proponent, their contractors, and project-related employees.

The public was consulted as required by the EMA and its 2012 EIA Regulations (Sections 21 to 24). This was done via the two newspapers (New Era and The Namibian) used for this

environmental assessment. A consultation through a face-to-face meeting with directly affected landowners whereby they raised concerns and comments on the proposed project activities.

The issue and concern raised by the registered I&APs formed the basis for this Report and the Draft EMP. The issue was incorporated into this Report whereby mitigation measures have been provided thereof to avoid and/or minimize their significance on the social components. Most of the potential impacts were found to be of medium-rating significance. With the effective implementation of the recommended management and mitigation measures, will particularly see a reduction in the significance of adverse impacts that cannot be avoided completely (from medium rating to low). To maintain the desirable rating, the implementation of management and mitigation measures should be monitored by the Proponent directly, or their Environmental Control Officer (ECO) is highly recommended. The monitoring of this implementation will not only be done to maintain the reduced impacts' rating or maintain a low rating but to also ensure that all potential impacts identified in this study and other impacts that might arise during implementation are properly identified in time and addressed right away too.

It is crucial for the Proponent and their contractors as well as to effectively implement the recommended management and mitigation measures to protect both the biophysical and social environment throughout the project duration. All these would be done to promote environmental sustainability while ensuring a smooth and harmonious existence and purpose of the project activities in the community and environment at large.

Recommendations

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

Based on the findings of the Environmental Scoping Assessment for EPL 9779, the following recommendations are proposed:

- Environmental Clearance Certificate (ECC): It is recommended that the Ministry of Environment, Forestry and Tourism (MEFT) grants the ECC for exploration activities, subject to strict adherence to the Environmental Management Act (2007) and its regulations.

- Implementation of the Environmental Management Plan (EMP): The proponent must implement the EMP as an operational guide for managing all identified impacts. This should include regular monitoring, reporting, and compliance audits.
- Water Resource Management: Given the scarcity of water in the Kunene Region, strict water-use permits must be obtained. Groundwater abstraction should be monitored, and alternative water sources (such as water trucking) should be considered to minimize pressure on local aquifers.
- Community Engagement: Continuous stakeholder and community engagement with the Okatjandja kozomenje, Okangundumba and Ombujokanguindi conservancies and local traditional authorities is essential. Clear communication channels must be maintained to address grievances, promote transparency, and ensure local participation.
- Biodiversity Conservation: Exploration should avoid ecologically sensitive zones, wildlife corridors, and areas of high biodiversity importance. Rehabilitation of disturbed areas must be prioritized to restore natural vegetation.
- Health and Safety: All exploration activities should adhere to occupational health and safety standards. Training, provision of PPE, and emergency preparedness must be mandatory for all employees and contractors.
- Cultural and Heritage Preservation: Heritage chance find procedures must be strictly implemented. Any cultural or archaeological resources encountered must be reported immediately to the National Heritage Council.
- Cumulative Impact Monitoring: The proponent should work closely with the conservancy management to track cumulative impacts on grazing land, wildlife, and local livelihoods. Joint monitoring initiatives will strengthen compliance and trust with affected communities.
- Clear stakeholder engagement is recommended prior and throughout the exploration phase to minimise conflict, manage expectations, and promote social acceptability of the proposed activities, recognising that community members retain the right to object through established statutory processes. Furthermore, ensure compliance with the consultation, access, and consent requirements prescribed under the Minerals (Prospecting and Mining) Act, 1992, prior to commencing exploration activities on affected land.

Disclaimer

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

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

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LIST OF ABBREVIATIONS

Abbreviation	Meaning
AMSL	Above Mean Sea Level
BID	Background Information Document
CV	Curriculum Vitae
DEA	Department of Environmental Affairs
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
EDS	Excel Dynamic Solutions
ESA	Environmental Scoping Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
EPL	Exclusive Prospecting Licence
GG	Government Gazette

GN	Government Notice
I&APs	Interested and Affected Parties
MET	Ministry of Environment, Forestry, and Tourism
MME	Ministry of Mines and Energy
PPE	Personal Protective Equipment
Reg	Regulation
S	Section
TOR	Terms of Reference

DEFINITION OF TERMS

Alternative	A possible course of action, in place of another would meet the same purpose and need of the proposal.
Baseline	Work done to collect and interpret information on the condition/trends of the existing environment.
Biophysical	That part of the environment does not originate with human activities (e.g. biological, physical, and chemical processes).
Cumulative Impacts/Effects Assessment	About an activity, means the impact of an activity that in it may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
Decision-maker	The person(s) entrusted with the responsibility for allocating resources or granting approval to a proposal.
Ecological Processes	Processes play an essential part in maintaining ecosystem integrity. Four fundamental ecological processes are the cycling of water, the cycling of nutrients, the flow of energy, and biological diversity (as an expression of evolution).

Environment	As defined in the Environmental Management Act - the complex of natural and anthropogenic factors and elements that are mutually interrelated and affect the ecological equilibrium and the quality of life, including – (a) the natural environment that is land, water, and air; all organic and inorganic matter and living organisms and (b) the human environment that is the landscape and natural, cultural, historical, aesthetic, economic and social heritage and values.
Environmental Management Plan	As defined in the EIA Regulations (Section 8(j)), a plan that describes how activities that may have significant environments effects are to be mitigated, controlled, and monitored.
Exclusive Prospecting Licence	Is a license that confers exclusive mineral prospecting rights over the land of up to 1000 km2 in size for an initial period of three years, renewable twice for a maximum of two years at a time
Interested and Affected Party (I&AP)	Concerning the assessment of a listed activity includes - (a) any person, group of persons, or organization interested in or affected by the activity; and (b) any organ of state that may have jurisdiction over any aspect of the activity. Mitigate - practical measures to reduce adverse impacts. Proponent – as defined in the Environmental Management Act, a person who proposes to undertake a listed activity. Significant impact - means an impact that by its magnitude, duration, intensity, or probability of occurrence may have a notable effect on one or more aspects of the environment.
Fauna	All of the animals that are found in a given area.
Flora	All of the plants are found in a given area.
Mitigation	The purposeful implementation of decisions or activities that are designed to reduce the undesirable impacts of a proposed action on the affected environment.

Monitoring	Activity involving repeated observation, according to a pre-determined schedule, of one or more elements of the environment to detect their characteristics (status and trends).
Nomadic Pastoralism	Nomadic pastoralists live in societies in which the husbandry of grazing animals is viewed as an ideal way of making a living and the regular movement of all or part of the society is considered a normal and natural part of life. Pastoral nomadism is commonly found where climatic conditions produce seasonal pastures but cannot support sustained agriculture.
Proponent	Organization (private or public sector) or individual intending to implement a development proposal.
Public Consultation/Involvement	A range of techniques can be used to inform, consult or interact with stakeholders affected by the proposed activities.
Protected Area	Refers to a protected area that is proclaimed in the Government Gazette according to the Nature Conservation Ordinance number 4 of 1975, as amended
Scoping	An early and open activity to identify the impacts that are most likely to be significant and require specialized investigation during the EIA work. Can, also be used to identify alternative project designs/sites to be assessed, obtain local knowledge of the site and surroundings, and prepare a plan for public involvement. The results of scoping are frequently used to prepare a Terms of Reference for the specialized input into full EIA.
Terms of Reference (ToR)	Written requirements governing full EIA input and implementation, consultations to be held, data to be produced, and form/contents of the EIA report. Often produced as an output from scoping.

1 INTRODUCTION

1.1 Project Background

Libra Seventy-One Investments (Pty) Ltd (The Proponent) has applied to the Ministry of Environment, Forestry and Tourism (MEFT) to be granted an Environmental Clearance Certificate (ECC) for the Exclusive Prospecting License (EPL) No. 9779. Excel Dynamic Solutions (Pty) Ltd (The Consultant) was appointed to act on behalf of the proponent in obtaining the ECC. The EPL covers a total surface area of 16,752.0323 hectares (ha), located approximately east of Otwani, Kunene region as shown in **(Figure 1)**. The EPL overlaps the Okangundumba, Ombujokanguidi and Okatjanda Kozomenje conservancies. The target commodities for the prospecting and exploration activities are **Base & Rare Metals, Dimension stone, Industrial Minerals, Nuclear Fuel Minerals and Precious Metals.**

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

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

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

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

The EIA project is headed by Mr. Nerson Tjelos, a qualified and experienced Geoscientist and experienced EAP. The consultation process and reporting are done by Mr. Wilbard Angula and reviewed by Ms. Iyaloo Nakale. The EAP CVs are presented in **Appendix C**.

1.3 Motivation for the Proposed Project

The mining industry is one of the largest contributors to the Namibian economy. It contributes to the improvement of local livelihoods. In Namibia, the exploration of minerals is done mainly by the private sector. Exploration activities have potential to enhance and contribute to the development of other sectors and their activities do provide temporary employment to permanent, and taxes that fund social infrastructural development. The mineral sector yields considerable revenue and accounts for a significant portion of the gross domestic product (GDP). Additionally, the industry produces a trained workforce and uplifts local small businesses in communities and may initiate related businesses. Exploration activity fosters several associated activities such as the manufacturing of exploration and mining equipment, and the provision of engineering and environmental services upgrade of basic services and infrastructure including roads, rails, water supply and medicals. Moreover, the mining sector forms a vital part of some of Namibia's development plans. Mining is essential to the development goals of Namibia in contributing to meeting the ever-increasing global demand for minerals, and for national prosperity. It is thus that

successful exploration outcome on EPL 9779 would lead to the mining of the target minerals, which would contribute towards achieving the goals of the national development plans.

2 PROJECT DESCRIPTION: PROPOSED EXPLORATION ACTIVITY

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

2.1 Prospecting Phase (Non- Invasive Techniques)

2.1.1 Desktop Study

This mainly entails a desktop review of geological maps of the area, on-site ground traverses and observations, and an update, where relevant, of the information obtained during previous geological studies of the area.

2.1.2 Geophysical surveys

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

2.1.3 Lithology geochemical surveys

Stream, soil and rock samples shall be collected and taken for trace element analysis to be conducted by analytical chemistry laboratories to determine the sufficiency of the mineral and the feasibility of mining the mineral. Additionally, trenches or pits may be dug depending on the commodity (in a controlled environment e.g., fencing off and labelling activity sites) adopting a manual or excavator to further investigate the mineral potential.

Stream sampling consists of acquiring a small (1kg) sample of sediment from the channel of all first-order streams draining the area of interest. This rapidly screens the area to identify locations which may require further exploration.

Soil sampling consists of small pits being dug, where 1kg samples can be extracted and sieved to collect about 50g of material. As necessary, and to ensure adequate risk mitigation, all major excavations will be closed immediately after obtaining the needed samples, or the sites will be secured until the trenches or pits are closed. The landowner and other relevant stakeholders will be engaged to obtain authorization where necessary.

2.2 Exploration Phase (Invasive Techniques)

2.2.1 Exploration Phase (Invasive Techniques)

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

No explosives will be used during the exploration phase.

2.2.2 Detailed Exploration (Drilling)

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

A typical drilling site consists of a drill-rig and support vehicles, as well as a core and geological samples store. A drill equipment parking and maintenance yard may be set up (including a fuel and lubricants storage facility).

Other aspects of the proposed exploration operations include:

2.2.3 Accessibility to Site

The EPL is accessible via C43 from Opuwo, Kunene region. The Proponent may need to do some upgrading on the site access roads to ensure that it is fit to accommodate project-related vehicles, such as heavy trucks.

2.2.4 Material and Equipment

The requirements of the exploration program in terms of vehicles and equipment include (4X4) vehicles, a truck, water tanks, drill rigs and drilling machines, and a power generator. Equipment and vehicles will be stored at a designated area near the accommodation site or a storage site established within the EPL area.

2.2.5 Services and Infrastructure

- **Water:** Water for the exploration operations on the EPL will be obtained from the nearest existing boreholes, or the proponent will drill boreholes within the EPL, upon obtaining necessary permits and signed agreements with the landowners in the area. The estimated monthly water consumptions are 3000 liters. This includes water for drinking, sanitation, cooking, dust control (if necessary), as well as washing of equipment.
- **Power supply:** Power required during the operation phase will be provided by diesel generators. About 200 liters of diesel will be used per month.
- **Fuel (diesel for generators and other equipment):** The fuel (diesel) required for exploration equipment will be stored in a tank mounted on a mobile trailer, and drip trays will be readily available on this trailer and monitored to ensure that accidental fuel spills are cleaned up as soon as they have been detected/observed. Fuel may also be stored in a bunded diesel bowser on site, and in jerry cans placed on plastic sheeting to avoid unnecessary contamination of soils.

2.2.6 Waste Management

The site will be equipped with secured waste bins for each type of waste (i.e., domestic, hazardous, and recyclable). Depending on the amount generated, waste will be sorted and collected as regularly as possible and taken to the nearest certified landfill site. An agreement will need to be reached with different waste management facility operators/owners and authorization or permits will be obtained before utilizing these facilities, in the case of production of any hazardous waste.

- **Sanitation and human waste:** Portable ablution facilities will be used, and the sewage will be disposed of according to the approved disposal or treatment methods of the facility manufacturer.

- **Hazardous waste:** Drip trays and spill control kits will be available on-site to ensure that oil/fuel spills and leaks from vehicles and equipment are captured on time and contained correctly before polluting the site.

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

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

2.2.7 Safety and Security

- **Storage Site:** Temporary storage areas for exploration material, equipment, and machinery will be required at the campsite and/or exploration sites. Security will be supplied on a 24-hour basis at the delegated sites for storage. A temporary support fence surrounding the storage site will be constructed to ensure people and domestic animals are not put at risk.
- **Fire management:** A minimum of basic firefighting equipment, i.e., fire extinguishers will be readily available in vehicles, at the working sites and camps. The exploration crew is required to have the contact details of the nearest fire station at hand in case of a larger scale of fires at the site. The exploration team will be trained with basic firefighting.
- **Health and Safety:** Adequate and appropriate Personal Protective Equipment (PPE) will be provided to every project personnel while on and working at the site. A first aid kit will be readily available on-site to attend to potential minor injuries.

2.2.8 Accommodation

The exploration crew will be accommodated in the nearest town, or a campsite will be set up for the exploration crew near the exploration sites. If the accommodation camp is to be set up on the site, necessary arrangements will be made with the landowner. Exploration activities will take place during daytime only and staff will commute to the exploration site(s) from their place of accommodation if they are not accommodated on site.

2.3 Decommissioning and Rehabilitation Phase

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

3 PROJECT ALTERNATIVES

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

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

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

The alternatives considered for the proposed development are discussed in the following subsections.

3.1 Types of Alternatives Considered

3.1.1 The "No-go" Alternative

The “no action” alternative implies that the status quo remains, and nothing happens. Should the proposal of exploration activities on the EPL, be discontinued, none of the potential impacts (positive and negative) identified would occur. If the proposed project is to be discontinued, the current land use for the proposed site will remain unchanged.

The no-go alternative implies that no prospecting or exploration activities would be undertaken on EPL No. 9779. This would avoid all potential environmental and social impacts associated with exploration, including land disturbance, biodiversity loss, and pressure on scarce water resources.

However, the socio-economic benefits such as employment creation, local procurement, skills transfer, and potential long-term mining investment would also be foregone. Given Namibia's national development goals (Vision 2030, NDP 6, Harambee Prosperity Plan), the no-go option is less favourable from a developmental perspective, but it remains the environmentally safest alternative.

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

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

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

3.1.2 Exploration Location

The prospecting/exploration location is dependent on the geological setting (regional and local), the economic geology, and the exploration and mining history of the EPL area. Therefore, finding an alternative location for the planned exploration activities is not possible. This means that the mineralization of the target commodities is area-specific, and exploration targets are primarily

determined by the geology (host rocks) and the tectonic environment of the site (an ore-forming mechanism). The tenement has a sufficient surface area for future related facilities, should an economic mineral deposit be defined.

The potential locations of mineral resources nationwide are mapped and categorized by the Ministry of Industries, Mines and Energy as exclusive prospecting licenses, mining licenses and claims, mineral deposit retention licenses, reconnaissance licenses, and exclusive reconnaissance licenses on the Namibia Mining Cadastral Map <https://portal.mme.gov.na/page/Map> Public Cadastral information on EPL No. 9779 is shown in

Figure 2.

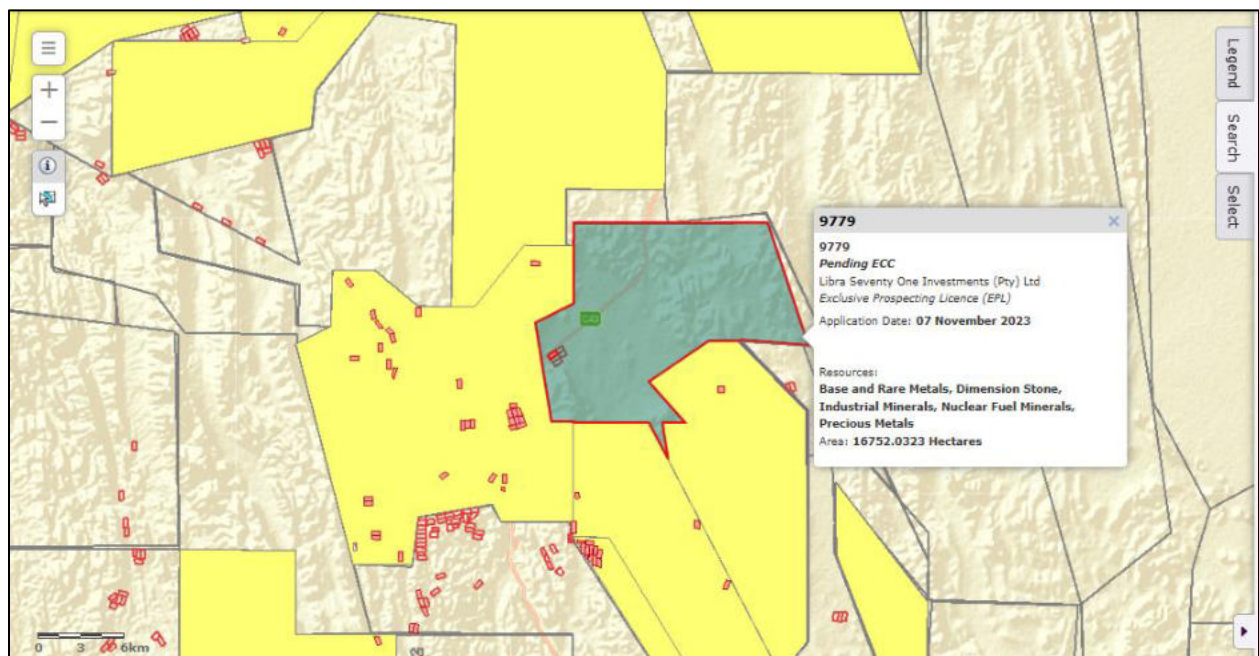


Figure 2: EPL 9779 on the National Mining Cadastre

3.1.3 Exploration Method

Both invasive and non-invasive exploration activities are expected to take place. If an economically viable discovery is made, the project will proceed to the mining phase upon approval of a mining license. If any other alternative viable exploration methods are found to achieve the purpose more effectively and/or efficiently without aggravating any environmental measures put in place, it can be implemented.

- **Non-Invasive Methods:** Geological mapping, geochemical sampling, and geophysical surveys. These methods have minimal environmental impact and will be prioritized in the initial phases.
- **Invasive Methods:** Drilling (reverse circulation and diamond core) and trenching. While necessary for obtaining subsurface data, these methods have higher environmental footprints, including vegetation clearing, soil disturbance, and noise generation.

A combined approach is recommended: initial reliance on non-invasive methods to narrow down targets, followed by limited invasive exploration in selected areas. This reduces the overall footprint and ensures exploration efficiency.

Table 1: Comparison of Alternatives

Alternative	Advantages	Disadvantages
No-Go	Prevents all negative impacts; maintains ecological integrity.	Loss of economic opportunities, no resource development, missed job creation.
Location	Focused on EPL 9779, legally compliant; activities can be localized to disturbed areas.	Limited flexibility outside EPL boundary; potential land-use conflicts with grazing and conservation.
Methods	Non-invasive reduces impact; invasive methods provide essential geological data.	Invasive methods cause disturbance to soils, vegetation, and communities.

Table 2: Presentation of pitting, and trenching as well as comparison of reverse circulation and diamond drilling methods

Invasive exploration Method (Alternatives Considered)	Short Description	Justification for selected option
Pitting and trenching	<p>-Pits and trenches, or to use the old Cornish mining term, costeans, can be a quick, cheap way of obtaining lithological and structural information in areas of shallow cover.</p> <p>-Pitting is usually employed to test shallow, extensive, flat-lying bodies of mineralization. An ideal example of this would be a buried heavy mineral placer.</p> <p>-The main advantage of pitting over a pattern-drill programme on the same deposit is that pits can provide a very large volume sample. Large sample sizes are necessary to overcome problems of variable grade distribution, which are a characteristic feature of such deposits.</p> <p>-Trenches are usually employed to expose steep dipping bedrock buried below shallow</p>	<p>-Quick, cheap way of obtaining lithological and structural information in areas of shallow cover.</p> <p>-Pits can provide a very large volume sample. Large sample sizes are necessary to overcome problems of variable grade distribution, which are a characteristic feature of such deposits.</p> <p>-Trenches are an excellent adjunct to RC drilling programmes, where the structural data from trench mapping are needed to complement the lithological information obtained from the drill cuttings (Marjoribanks, 1997)</p>

	<p>overburden and are normally dug across the strike of the rocks or mineral zone being tested (Marjoribanks, 1997).</p>	
<p>Reverse Circulation (RC)</p>	<p>-Crushed rock is collected in the form of cuttings samples called back within stems contrast to conventional drilling that puts the air inside the stems and cuttings outside. Here the air passes downwards through the annular space between the inner shaft and the outer tube.</p> <p>-Water is often used down the hole to cool the drill bit and reduce dust as well as assisting with the transportation of sample bits to the surface.</p> <p>-RC drilling is designed for drilling through and crushing hard rock. -RC is fundamentally different from diamond core drilling, both in terms of equipment and sampling. One major difference is that RVC drilling creates small rock chips instead of solid core. Furthermore, according to Technidrill (2020), the RC method:</p>	<p>-Compared to diamond drilling, RC requires less water. Therefore, RC drilling will put less pressure on water supply and use. The major differences between RC and diamond drilling are in the rate of penetration and cost per foot. RVC drilling is much faster than diamond core drilling, and much less expensive.</p> <p>-Unlike diamond drilling, this process creates rock chips that can be analysed, rather than a solid, cylindrical piece of rock.</p> <p>-Some types of information, such as structural details, are not possible to obtain in the absence of solid rock. Despite this disadvantage, much valuable information can still be obtained from the rock chips. For example, the chips are much easier to examine under a</p>

	<ul style="list-style-type: none"> -Allows full recovery of samples continuously -Quick installation -There is no contact between the walls and cuttings taken at the bottom. -The penetration rate is fast (Technidril, 2020) 	<p>microscope. Testing of fluorescence and effervescence are easily accomplished (Earth Science Australia, 2020). It is for these reasons that RC will be the most preferred method and mainly used. However, the RC drilling would be combined with Diamond drilling where necessary for more reliable data collection and analysis. Diamond drilling would more applicable where deeper holes are required than is possible using RC drilling. - In-fill drilling would also be applied to support an update to a higher classification of the Mineral Resource estimate.</p>
<p>Infill drilling</p>	<p>The progress of an exploration project mostly depends on the result of the primary boreholes. Therefore, primary exploration boreholes must intersect high-grade mineralization zones with considerable thickness. On the other hand, the infill boreholes are designed based on obtained results from the primary boreholes (Fatehi, Moradzadeh, & Hezarkhani, 2017). Therefore, infill drilling is intended to support an update to a higher classification of the Mineral Resource</p>	

	<p>estimate. The metallurgical test-work results will improve understanding of blending designs in the exploration schedules for the product offtake specifications (Canyon Resources, 2021).</p>	
<p>Diamond (Core) drilling</p>	<p>-Diamond core drilling uses a diamond bit, which rotates at the end of drill rod (or pipe). The opening at the end of the diamond bit allows a solid column of rock to move up into the drill pipe and be recovered at the surface</p> <p>-The diamond bit is rotated slowly with gentle pressure while being lubricated with water to prevent overheating. As a result, this drilling method is known to use a huge amount of water compared to RC, thus may put pressure on water supply sources. -While the drill cuttings obtained with RC drilling can be analysed to provide a limited amount of information, the scope of these tests is limited, and their locations are less precise. Core samples, on the other hand, will identify actual veins of materials and give you their precise location (BG Drilling, 2016). Therefore, for</p>	<p>Diamond drilling provides more information including orientation of structures compared to RC drilling.</p> <p>Diamond drilling is accurate with less deviation when comparing to RC and can achieve deeper depth of drilling.</p> <p>Diamond drills are usually small and dust free.</p>

	<p>accuracy's sake, diamond drilling would provide better result. In other words, RC results are reliable but may not be accurate.</p> <p>-As diamond is one of the strongest materials in the world, it has no trouble drilling through most surfaces. Therefore, it works well across a wider range of ground types and conditions.</p> <p>-Time-consuming and more effort is required to obtain the drill core.</p> <p>-Low initial investment, but generally more expensive to meters drilled because of the limitation of the speed.</p>	
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The final drilling technique would be determined by the mineralization type. However, based on the information presented in the Table above regarding the detailed exploration methods, it was found that the combination of Reverse Circulation (RC) and Diamond (DD) drilling is preferable as much as possible. RC will give quick information regarding the grade and depth of intersection which will later be infilled by Diamond drilling for structural and geotechnical interpretation. This will have a reduction in cost and timeframe to make informed decision.

3.2 Location Alternative

Exploration activities are geographically constrained to EPL No. 9779, as the license is issued by the Ministry of Industries, Mines and Energy (MIME) for this specific area. Relocation is therefore not feasible. Within EPL No. 9779 activities can, however, be optimized to minimize environmental disturbance by:

- Prioritizing existing tracks and disturbed areas for site access.
- Avoiding ecologically sensitive zones, heritage sites, and community water points.
- Restricting exploration to target mineralization zones identified during prospecting.

4 LEGAL FRAMEWORK: LEGISLATION, POLICIES AND GUIDELINES

Prospecting and exploration activities have legal implications associated with certain applicable legal standards. A summary of applicable and relevant international policies and Namibian legislation, policies, and guidelines for the proposed development is given in this section (**Table 3**). The proposed prospecting and exploration activities under EPL No. 9779 must comply with the national legal and policy framework of Namibia, as well as relevant international conventions to which Namibia is a signatory. An overview of applicable legislation, policies, and international agreements that guide environmental protection, sustainable development, and responsible exploration is provided. This summary serves to inform the project Proponent, Interested and Affected Parties, and the decision-makers at the DEA, of the requirements and expectations, as laid out in terms of these instruments, to be fulfilled to establish the proposed prospecting and exploration activities.

4.1 The Environmental Management Act (No. 7 of 2007)

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

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

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

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

Environmental Management Act, 2007 (Act No. 7 of 2007)

This is the principal legislation governing environmental protection in Namibia. It requires that all listed activities, including mineral exploration, undergo an Environmental Impact Assessment (EIA) and obtain an Environmental Clearance Certificate (ECC) from the Ministry of Environment and Tourism (MET).

Environmental Impact Assessment Regulations, 2012 (GN No. 30 of 2012)

The regulations operationalize the Environmental Management Act by outlining procedures for conducting EIAs, public participation, and submission requirements for ECC applications.

Minerals (Prospecting and Mining) Act, 1992 (Act No. 33 of 1992)

This Act governs the issuance of Exclusive Prospecting License (EPL) and mining rights in Namibia. It places obligations on license holders to conduct operations responsibly and with due regard for the environment.

Water Resources Management Act, 2013 (Act No. 11 of 2013)

This Act provides for the management, protection, and sustainable use of water resources. Exploration activities requiring groundwater use must obtain permits from the Ministry of Agriculture, Water and Land Reform.

Nature Conservation Ordinance, 1975 (Ord. 4 of 1975)

This ordinance provides for the declaration of conservancies and the protection of wildlife. The Okatjandja kozomenje, Okangundumba and Ombujokanguindi conservancies, within which EPL 9779 is located, were proclaimed under this ordinance, thereby requiring compliance with community-based natural resource management regulations.

Labour Act, 2007 (Act No. 11 of 2007)

The Labour Act regulates employment conditions, health and safety requirements, and protection of workers’ rights during exploration activities.

National Heritage Act, 2004 (Act No. 27 of 2004)

The Act protects archaeological and cultural heritage resources. Exploration projects must report any chance finds to the National Heritage Council and avoid disturbance of heritage sites.

Other legal obligations that are relevant to the proposed activities of EPL No. 9779 and related activities are presented below.

Table 3: Applicable local, national and international standards, policies and guidelines governing the proposed prospecting and exploration activities

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
The Constitution of the Republic of Namibia, 1990 as amended: Government of the Republic of Namibia	The Constitution of the Republic of Namibia (1990 as amended) addresses matters relating to environmental protection and sustainable development. Article 91(c) defines the functions of the Ombudsman to include: "...the duty to investigate complaints concerning the over-utilization of living natural resources, the irrational exploitation of non-renewable resources, the degradation and destruction of ecosystems and failure	By implementing the environmental management plan, the establishment will be conformant to the constitution in terms of environmental management and sustainability. Ecological sustainability will be the main priority for the proposed development.

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
	<p>to protect the beauty and character of Namibia...”</p> <p>Article 95(l) commits the state to actively promoting and maintaining the welfare of the people by adopting policies aimed at the:</p> <p>“...Natural resources situated in the soil and on the subsoil, the internal waters, in the sea, in the continental shelf, and in the exclusive economic zone are property of the State.”</p>	
<p>Minerals (Prospecting and Mining) Act (No. 33 of 1992): Ministry of Industries, Mines and Energy (MIME)</p>	<p>Section 52 requires mineral license holders to enter into a written agreement with affected landowners before exercising rights conferred upon the license holder.</p> <p>Section 52(1) mineral license holder may not exercise his/her rights in any town or village, on or in a proclaimed road, land utilized for cultivation, within 100m of any water resource (borehole, dam, spring, drinking trough, etc.) and boreholes, or no operations in municipal areas, etc.), which should individually be checked to ensure compliance.</p> <p>Section 54 requires a written notice to be submitted to the Mining Commissioner if the holder of a</p>	<p>The Proponent should enter into a written agreement with landowners before exploring their land. On communal land, the Proponent should engage the landowners for land use consent.</p> <p>An assessment of the impact on the receiving environment should be carried out.</p> <p>The Proponent should include as part of their application for the EPL, measures by which they will rehabilitate the areas where they intend to carry out mineral exploration activities.</p> <p>The Proponent may not carry out exploration activities within</p>

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
	<p>mineral license intends to abandon the mineral license area.</p> <p>Section 68 stipulates that an application for an exclusive prospecting license (EPL) shall contain the particulars of the condition of, and any existing damage to, the environment in the area to which the application relates and an estimate of the effect which the proposed prospecting operations may have on the environment and the measures to be taken to prevent or minimize any such effect.</p> <p>Section 91 requires that rehabilitation measures should be included in an application for a mineral license.</p>	<p>the areas limited by Section 52 (1) of this Act.</p>
<p>Mine Health & Safety Regulations, 10th Draft: Ministry of Health and Social Services (MHSS)</p>	<p>Makes provision for the health and safety of persons employed or otherwise present in the mineral licenses area. These deal with among other matters; clothing and devices; design, use, operation, supervision, and control of machinery; fencing and guards; and safety measures during repairs and maintenance.</p>	<p>The Proponent should comply with all these regulations concerning their employees.</p>
<p>Petroleum Products and Energy Act (No. 13 of 1990) Regulations</p>	<p>Regulation 3(2)(b) states that “No person shall possess [sic] or store any fuel except under the authority of a license or a certificate, excluding a person who possesses or stores such</p>	<p>The Proponent should obtain the necessary authorization from the MIME for the storage of fuel on-site.</p>

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
(2001): Ministry of Industries, Mines and Energy (MIME)	fuel in a quantity of 600 liters or less in any container kept at a place outside a local authority area”	
The Regional Councils Act (No. 22 of 1992): Ministry of Urban and Rural Development (MURD)	This Act sets out the conditions under which Regional Councils must be elected and administer each delineated region. From a land use and project planning perspective, their duties include, as described in section 28 “to undertake the planning of the development of the region for which it has been established with a view to physical, social and economic characteristics, urbanization patterns, natural resources, economic development potential, infrastructure, land utilization pattern and sensitivity of the natural environment.	The relevant Regional Councils are IAPs and must be consulted during the Environmental Assessment (EA) process. The project site falls under the Kunene Regional Council; therefore, they should be consulted.
Water Act 54 of 1956: Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)	The Water Resources Management Act 11 of 2013 is present without regulations; therefore, the Water Act No 54 of 1956 is still in force: Prohibits the pollution of water and implements the principle that a person disposing of effluent or waste has a duty of care to prevent pollution (S3 (k)). Provides for control and protection of groundwater (S66 (1), (d (ii))).	The protection (both quality and quantity/abstraction) of water resources should be a priority. The permits and license required thereto should be obtained from MAWLR’s relevant Departments (these permits include Borehole Drilling Permits, Groundwater Abstraction & Use Permits, and

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
	Liability of clean-up costs after closure/abandonment of an activity (S3 (l)). (l)).	when required, Wastewater / Effluent Discharge Permits).
Water Resources Management Act (No 11 of 2013): Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)	The Act provides for the management, protection, development, use, and conservation of water resources; provides for the regulation and monitoring of water services, and provides for incidental matters. The objects of this Act are to: Ensure that the water resources of Namibia are managed, developed, used, conserved, and protected in a manner consistent with, or conducive to, the fundamental principles set out in Section 66 - protection of aquifers, Subsection 1 (d) (iii) provide for preventing the contamination of the aquifer and water pollution control (S68).	
National Heritage Act No. 27 of 2004: Ministry of Education, Arts, and Culture (MEAC)	To provide for the protection and conservation of places and objects of heritage significance and the registration of such places and objects; to establish a National Heritage Council; to establish a National Heritage Register; and to provide for incidental matters.	The Proponent should ensure compliance with this act's requirements. The necessary management measures and related permitting requirements must be taken. This is done by consulting with the National Heritage Council

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
The National Monuments Act (No. 28 of 1969): Ministry of Education, Arts, and Culture (MEAC)	The Act enables the proclamation of national monuments and protects archaeological sites.	(NHC) of Namibia. The management measures should be incorporated into the Draft EMP.
Soil Conservation Act (No 76 of 1969): Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)	The Act makes provision for the prevention and control of soil erosion and the protection, improvement, and conservation of soil, vegetation, and water supply sources and resources, through directives declared by the Minister.	Duty of care must be applied to soil conservation and management measures must be included in the EMP.
Local Authorities Act No. 23 of 1992.	To provide for the determination, for purposes of traditional government, of traditional authority councils; the establishment of such authority councils; and to define the powers, duties and functions of traditional authority councils; and to provide for incidental matters.	Opuwo Rural constituency is the responsible local Authority of the area therefore they should be notified.
Public Health Act (No. 36 of 1919): Ministry of Health and Social Services (MHSS)	Section 119 states that “no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.”	The Proponent and all its employees should ensure compliance with the provisions of these legal instruments.

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
Health and Safety Regulations GN 156/1997 (GG 1617): Ministry of Health and Social Services (MHSS)	Details various requirements regarding the health and safety of labourers.	
Public and Environmental Health Act No. 1 of 2015: Ministry of Health and Social Services (MHSS)	The Act serves to protect the public from nuisance and states that no person shall cause a nuisance or shall suffer to exist on any land or premises owned or occupied by him or of which he is in charge any nuisance or other condition liable to be injurious or dangerous to health.	The Proponent should ensure that the project infrastructure, vehicles, equipment, and machinery are designed and operated in a way that is safe, or not injurious or dangerous to public health, and that the noise and dust emissions which could be considered a nuisance remain at acceptable levels. Public and environmental health should be preserved and remain uncompromised.
Atmospheric Pollution Prevention Ordinance (1976): Ministry of Health and Social Services (MHSS)	This ordinance provides for the prevention of air pollution and is affected by the Health Act 21 of 1988. Under this ordinance, the entire area of Namibia, apart from East Caprivi, is proclaimed as a controlled area for section 4(1) (a) of the ordinance.	The proposed project and related activities should be undertaken in such a way that they do not pollute or compromise the surrounding air quality. Mitigation measures should be put in place and implemented on-site.

Legislation / Policy / Guideline: Custodian	Relevant Provisions	Implications for this project
Hazardous Substance Ordinance, No. 14 of 1974: Ministry of Health and Social Services (MHSS)	The ordinance provides for the control of toxic substances. It covers manufacture, sale, use, disposal, and dumping as well as import and export. Although the environmental aspects are not explicitly stated, the ordinance provides for the importing, storage, and handling.	The Proponent should handle and manage the storage and use of hazardous substances on site so that they do not harm or compromise the site environment
Road Traffic and Transport Act, No. 22 of 1999: Ministry of Works and Transport (Roads Authority of Namibia)	The Act provides for the establishment of the Transportation Commission of Namibia; for the control of traffic on public roads, the licensing of drivers, the registration and licensing of vehicles, the control and regulation of road transport across Namibia's borders; and for matters incidental thereto. Should the Proponent wish to undertake activities involving road transportation or access to existing roads, the relevant permits will be required.	Mitigation measures should be provided for, if the roads and traffic impact cannot be avoided, the relevant permits must be applied for.
Labour Act (No. 6 of 1992): Ministry of Labour, Industrial Relations and Employment Creation (MLIREC)	Ministry of Labour, Industrial Relations and Employment Creation is aimed at ensuring harmonious labour relations through promoting social justice, occupational health and safety, and enhanced labour market services for the benefit of all Namibians. This ministry insures the effective implementation of the Labour Act No. 6 of 1992.	The Proponent should ensure that the prospecting and exploration activities do not compromise the safety and welfare of workers.

4.2 International Policies, Principles, Standards, Treaties, and Conventions

The international policies, principles, standards, treaties, and conventions applicable to the project are listed in **Table 4** below.

Table 4: International Policies, Principles, Standards, Treaties and Convention applicable to the project

Statute	Provisions	Project Implications
<p>Equator Principles</p>	<p>A financial industry benchmark for determining, assessing, and managing environmental and social risk in projects (August 2013). The Equator Principles have been developed in conjunction with the International Finance Corporation (IFC), to establish an International Standard with which companies must comply to apply for approved funding by Equator Principles Financial Institutions (EPFIs). The principles apply to all new project financings globally across all sectors.</p> <p>Principle 1: Review and Categorization</p> <p>Principle 2: Environmental and Social Assessment</p> <p>Principle 3: Applicable Environmental and Social Standards</p> <p>Principle 4: Environmental and Social Management System and Equator Principles Action Plan</p> <p>Principle 5: Stakeholder Engagement</p> <p>Principle 6: Grievance Mechanism</p> <p>Principle 7: Independent Review</p> <p>Principle 8: Covenants</p>	<p>These principles are an attempt to: ‘...encourage the development of socially responsible projects, which subscribe to appropriately responsible environmental management practices with a minimum negative impact on project-affected ecosystems and community-based upliftment and empowering interactions.’</p>

Statute	Provisions	Project Implications
	<p>Principle 9: Independent Monitoring and Reporting</p> <p>Principle 10: Reporting and Transparency</p>	
<p>The International Finance Corporation (IFC) Performance Standards</p>	<p>The International Finance Corporation's (IFC) Sustainability Framework articulates the Corporation's strategic commitment to sustainable development and is an integral part of the IFC's approach to risk management. The Sustainability Framework comprises IFC's Policy and Performance Standards on Environmental and Social Sustainability, and IFC's Access to Information Policy. The Policy on Environmental and Social Sustainability describes IFC's commitments, roles, and responsibilities related to environmental and social sustainability.</p> <p>As of 28 October 2018, there are ten (10) Performance Standards (Performance Standards on Environmental and Social Sustainability) that the IFC requires project Proponents to meet throughout the life of an investment. These standard requirements are briefly described below.</p> <p>Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</p> <p>Performance Standard 2: Labour and Working Conditions</p>	<p>The Performance Standards are directed toward clients, guiding how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business sustainably, including stakeholder engagement and disclosure obligations of the Client (Borrower) concerning project-level activities. In the case of its direct investments (including project and corporate finance provided through financial intermediaries), IFC requires its clients to apply the Performance Standards to manage environmental and social risks and impacts so that development opportunities are enhanced. IFC uses the Sustainability Framework along with other</p>

Statute	Provisions	Project Implications
	<p>Performance Standard 3: Resource Efficient and Pollution Prevention and Management</p> <p>Performance Standard 4: Community Health and Safety</p> <p>Performance Standard 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement</p> <p>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p> <p>Performance Standard 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</p> <p>Performance Standard 8: Cultural Heritage</p> <p>Performance Standard 9: Financial Intermediaries (FIs)</p> <p>Performance Standard 10: Stakeholder Engagement and Information</p> <p>A full description of the IFC Standards can be obtained from http://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-standards?cq_ck=1522164538151#ess1</p>	<p>strategies, policies, and initiatives to direct the business activities of the Corporation to achieve its overall development objectives.</p>
<p>The United Nations Convention to Combat</p>	<p>Addresses land degradation in arid regions with the purpose to contribute to the conservation and sustainable use of</p>	<p>The project activities should not be such that</p>

Statute	Provisions	Project Implications
Desertification (UNCCD) 1992	<p>biodiversity and the mitigation of climate change.</p> <p>The convention's objective is to forge a global partnership to reverse and prevent desertification/land degradation and to mitigate the effects of drought in affected areas to support poverty reduction and environmental sustainability United Nations Convention.</p>	they contribute to desertification.
Convention on Biological Diversity 1992	<p>Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, to ensure their conservation and sustainable use.</p> <p>Promote the protection of ecosystems, and natural habitats, and the maintenance of viable populations of species in natural surroundings.</p>	Removal of vegetation cover and destruction of natural habitats should be avoided and where not possible minimized.
Stockholm Declaration on the Human Environment, Stockholm (1972)	It recognizes the need for: “a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment.	Protection of natural resources and prevention of any form of pollution.

Relevant international Treaties and Protocols ratified by the Namibian Government

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

4.3 Namibian Policy Framework

4.3.1.1 National Development Plans (NDPs)

The project aligns with Namibia's development goals as outlined in the National Development Plans, particularly NDP6, which emphasizes economic growth, job creation, and sustainable natural resource management.

4.3.1.2 Vision 2030

Namibia's long-term development framework, Vision 2030, promotes sustainable development, responsible natural resource use, and poverty alleviation. Mineral exploration contributes to these goals when undertaken responsibly.

4.3.1.3 Harambee Prosperity Plan (HPP)

The Harambee Prosperity Plan underscores economic advancement, job creation, and improved service delivery. Exploration projects contribute to these outcomes by stimulating local economies.

4.4 International Conventions

Namibia is a signatory to several international conventions relevant to exploration activities, including:

- Convention on Biological Diversity (CBD) – Promotes conservation of biological diversity and sustainable use of its components.
- United Nations Framework Convention on Climate Change (UNFCCC) – Requires mitigation of activities contributing to climate change, including emission reduction practices.
- Ramsar Convention on Wetlands – Protects wetlands of international importance; though none exist within EPL No. 9779, compliance is required for national wetlands.
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – Regulates trade in endangered plant and animal species to prevent exploitation.

5 ENVIRONMENTAL AND SOCIAL BASELINE

The project activities will be undertaken in specific environmental and social conditions. The understanding of these conditions helps in identifying the sensitive environmental features that may need to be protected through the implementation of certain management and mitigation measures. The summary of selected physical, biological and social baseline information of the project area is provided below as per relevant published reports and books.

The climatic conditions of the EPL are described using the available nearest data for the area obtained from the Meteoblue website (2025).

5.1 Biophysical Environment

5.1.1 Climate

The EPL is located east of Otwani and experiences climatic conditions similar to those of Otwani. The area is characterised by a semi-arid climate, noticeable by high temperatures and seasonal rainfall. The warmest period occurs between September to December, with mean daily maximum temperatures reaching approximately 31°C in October. A wet season spans October to April, with peak precipitation concentrated between January and March. February is the wettest month, receiving nearly 160 mm of rain. This contrasts with the arid winter from June to August, during which virtually no rainfall occurs. During winter months of June and July the mean daily minimums fall to around 10°C, with nighttime lows occasionally approaching freezing.

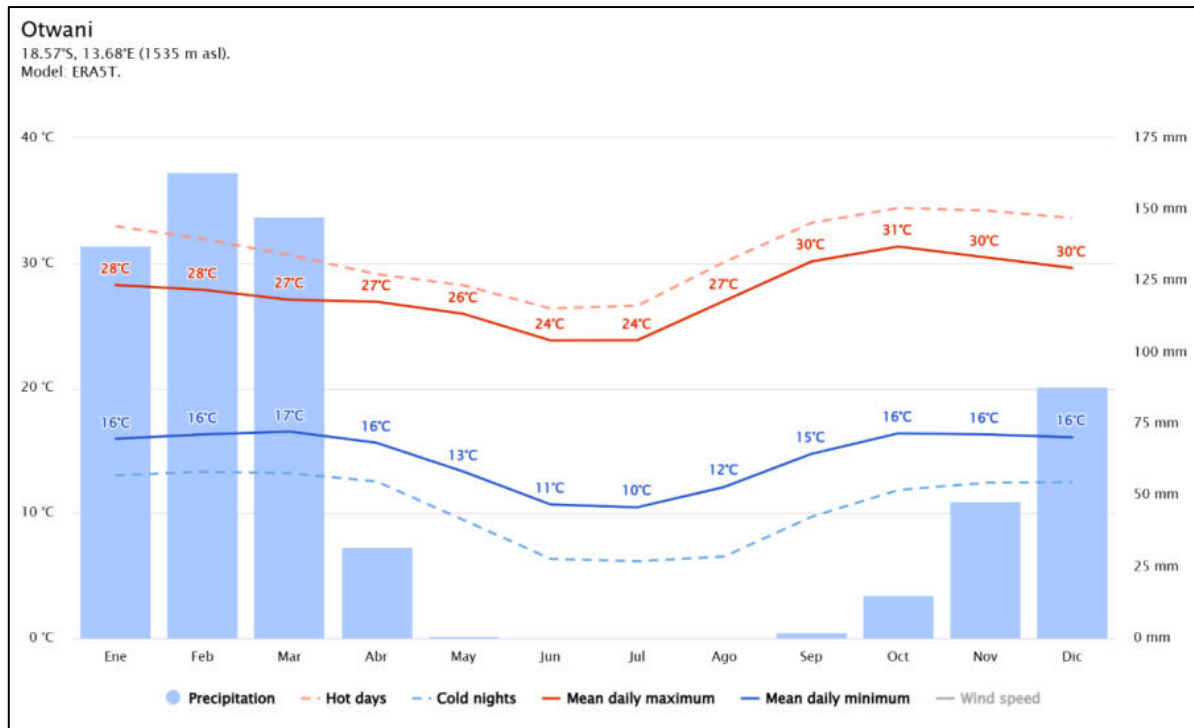


Figure 3: Climate Conditions around EPL 9779 source: (Meteoblue, N.D).

5.1.2 Topography

The EPL falls within the rugged and undulating terrain typical of Namibia’s Karsteveld. Elevations average between 1399-1851 meters above mean sea level. According to the Atlas of Namibia Team (2022), the Karstveld is defined by a geomorphological landscape developed on ancient sedimentary rocks, deposited approximately 750–600 million years ago. **Figure 4** below show the Topography map of the project area.

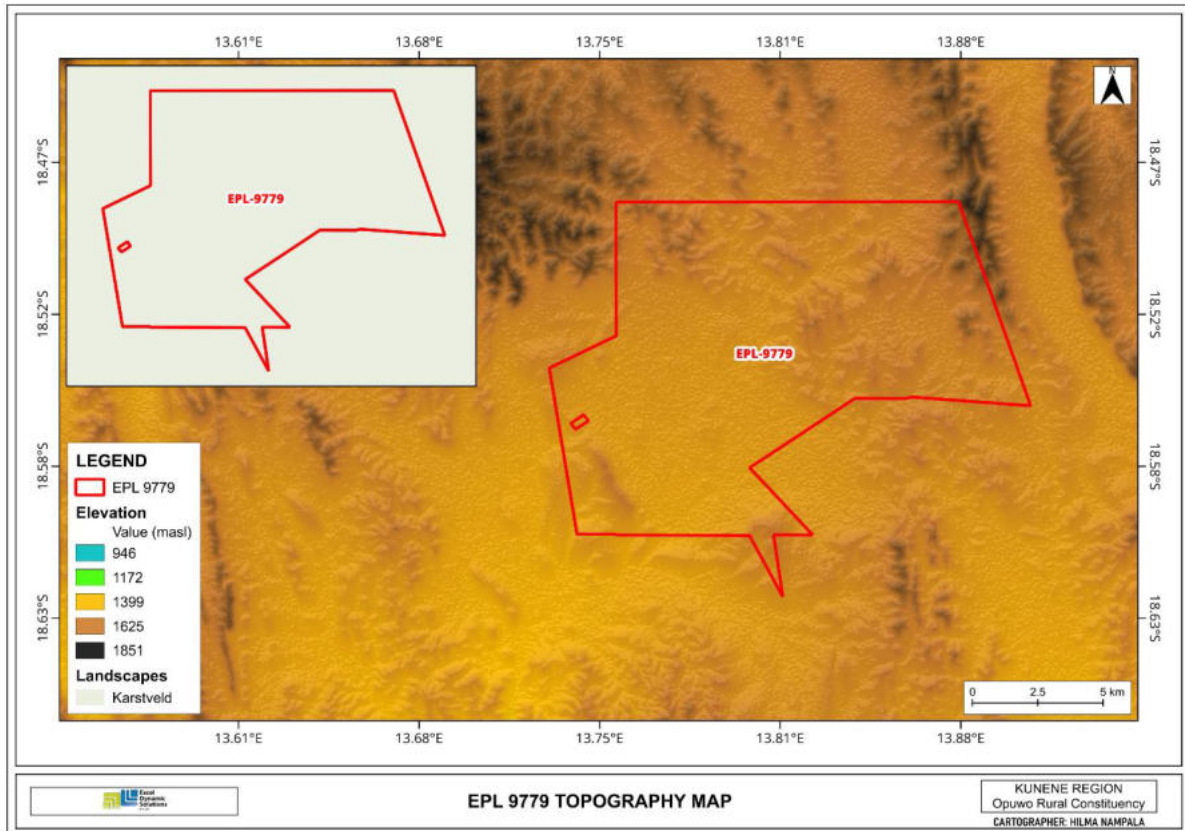


Figure 4: Topography Map for EPL 9779

5.1.3 Geology

The EPL is situated within the Damara Supergroup. The geology is primarily defined by the Otavi group, consisting of the Tsumeb, Abenab, and Ombombo subgroups. Rock outcrops are mostly of extensive dolostone (dolomite) in the Otavi group, with subordinate limestone. The carbonates are layered with quartzite formations from the underlying Nosib Group. Superficial deposits covering parts of the licence area consist primarily of sand, gravel, and calcrete.

Figure 5 below shows the geology map.

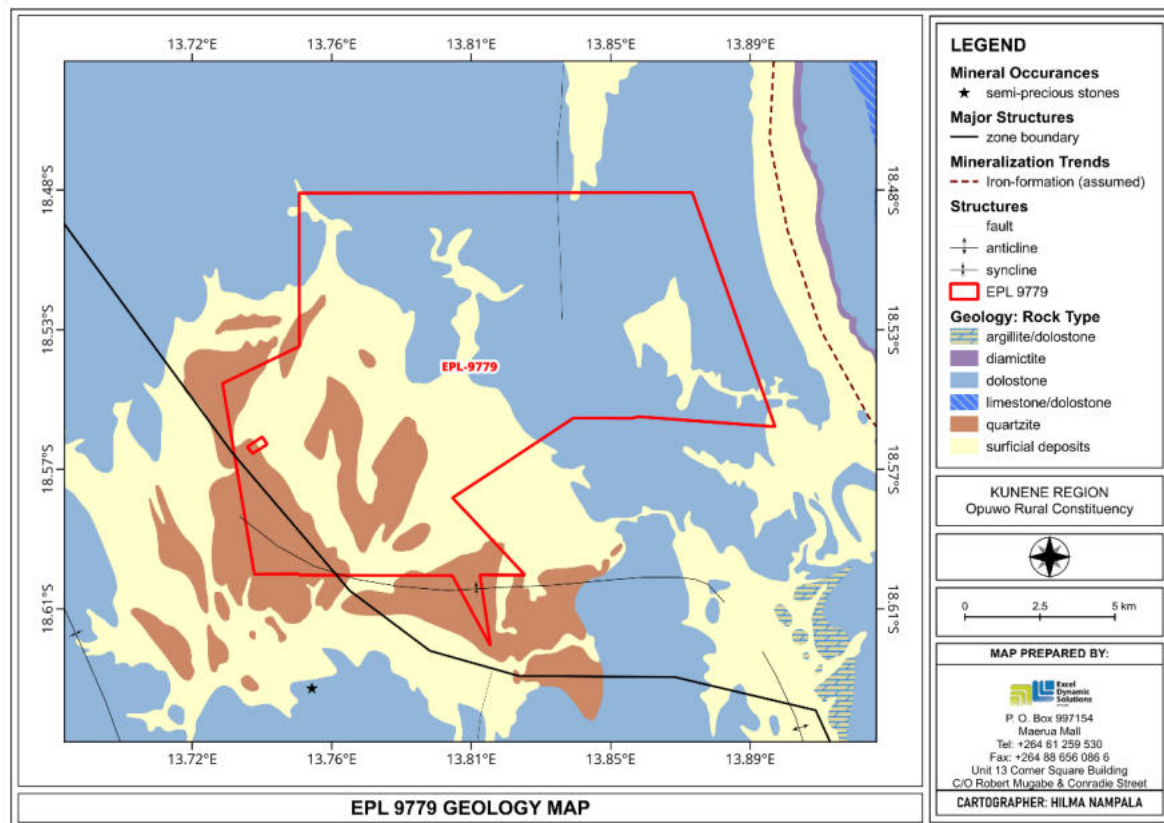


Figure 5: below show the Geology map of the EPL area.

5.1.4 Soil

The soil profile on the EPL consist mainly of chromic Cambisols, lithic Leptosols and Eutric regosols. Cambisols are poorly developed soils formed where the parent material is recently deposited or exposed, or where aridity or low temperatures slow down the processes of soil formation (Mendelsohn e. a., 2002). They form in a wide variety of medium to fine-textured parent materials, mostly in young colluvial, alluvial and aeolian deposits. Cambisols are found in arid climates. The chromic soil qualifier refers to soils with bright reddish colours in the subsoil. Chromic soils have a layer, at least 30 cm thick, between 25 and 150 cm from the soil surface, that has, in more than 90 % of its exposed area, a moist Munsell colour hue redder than 7 and chroma of more than 4 (Coetzee, 2021). The rock outcrops are exposed bedrock formations of varying size and morphology. Lithic Leptosols are extremely shallow, stony soils over continuous bedrock; they are nutrient-poor, have low water retention, and are unsuitable for agriculture. Eutric regosols refers to soils lacking distinct diagnostic layers, or those featuring only an ochric A horizon (unless that horizon is buried under 50 cm or more of recent material) (FAO , n.d.). **Figure 6** below shows a map of the soil type found within the EPL area.

It is notable that during the operational phase of the project, soil sampling may be conducted. Therefore, the Soil Conservation Act (No 76 of 1969) should be taken into account to ensure that soils are conserved in a way that does not promote soil erosion.

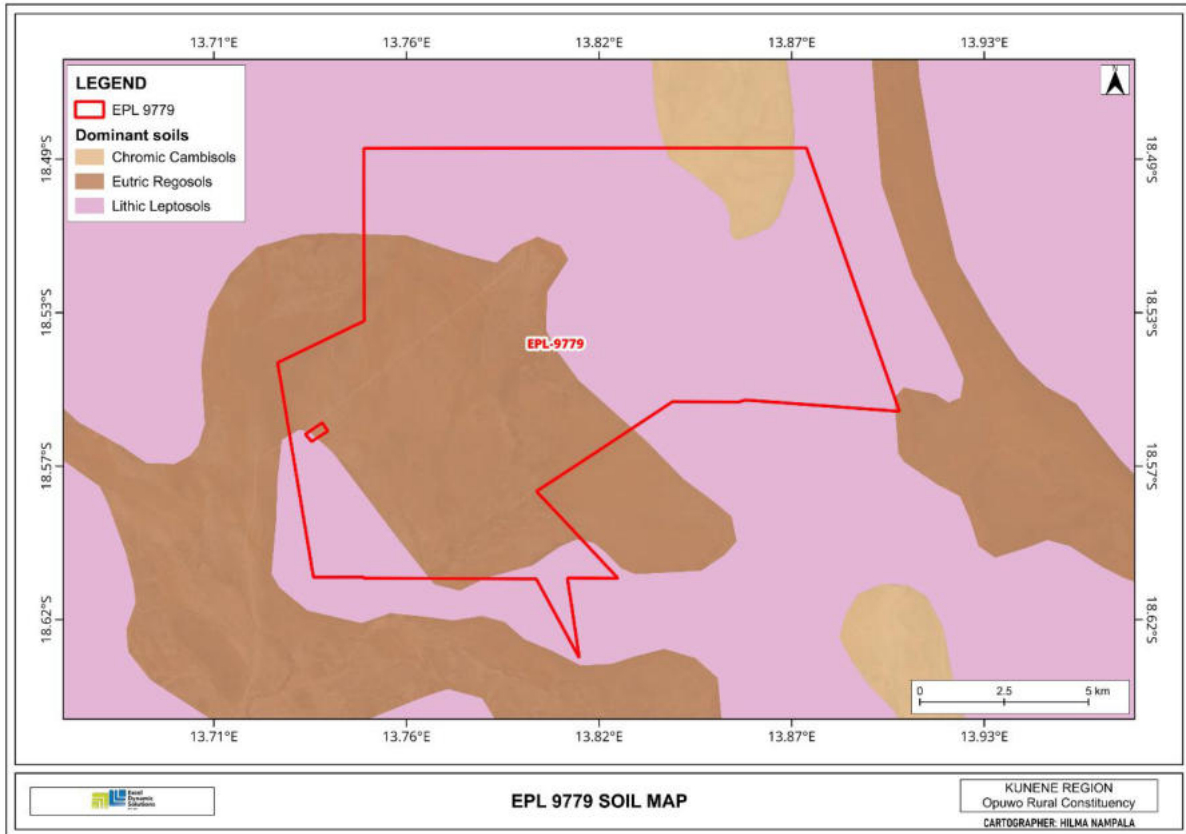


Figure 6: Dominant Soil Map – EPL 9779



Figure 7: Type of soil observed on the EPL 9779.

5.1.5 Water Resources: Groundwater and Surface Water

The EPL largely overlies fractured, fissured and karsteveld aquifers of moderate potential followed by rock bodies with low groundwater potential and portions of fractured, fissured and karsteveld aquifers of high potential. This area is prone to moderate groundwater vulnerability because of its mixed aquifer potential. While surface water is generally scarce due to runoff, the Hoarusib river and Otjitiamo provides a critical reservoir during raining season. **Figure 8** shows the hydrological map of the project area.

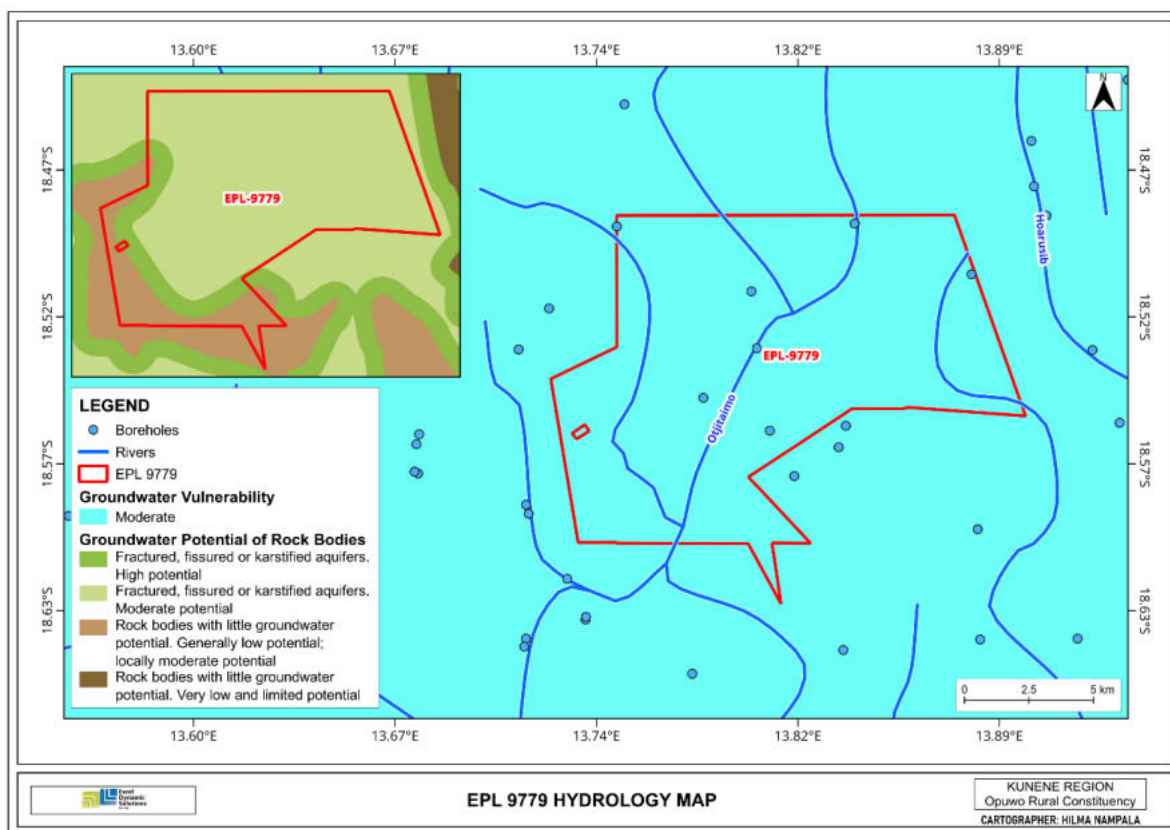


Figure 8: Hydrological map – EPL 9779.

5.1.6 Flora and Fauna

5.1.6.1 Flora

The EPL 9779 falls within the tree and shrub savannah of the Western Highlands. Atlas of Namibia (2022) states, this region hosts between 100 and 300 plant species and is characterised by open grasslands with sparse shrub cover. Floristically, the area belongs to the Kaokoveld group. This group comprises a total of 1,064 native vascular plant taxa and 51 naturalized species (Craven, 2002). The vegetation is dominated by Mopane (*Colophospermum mopane*) and scattered *Acacia* species such as *Acacia reficiens* and *A. erioloba*. Other common species include *Commiphora* (*Commiphora wildii*), Shepherd’s Tree

(*Boscia albitrunca*), Purple-pod Cluster-leaf (*Terminalia prunioides*), Trumpet Thorn (*Catophractes alexandri*), and Buffalo-thorn (*Ziziphus mucronata*). The ground layer consists largely of Bushman grass (*Stipagrostis* spp.) with interspersed low shrubs such as bitterbos.

Figure 10 below shows the vegetation map for the EPL 9779.

Operational phase might necessitate the clearance of vegetation to accommodate access roads and drilling sites. In compliance with legal and environmental safeguards, the Forest Act (No. 12 of 2001) and the Nature Conservation Ordinance of 1975 must be strictly adhered to. These regulations ensure the protection of flora, particularly protected species such as Mopane, *Boscia* spp and *Commiphora* mandate that necessary permits be secured prior to any vegetation clearance.

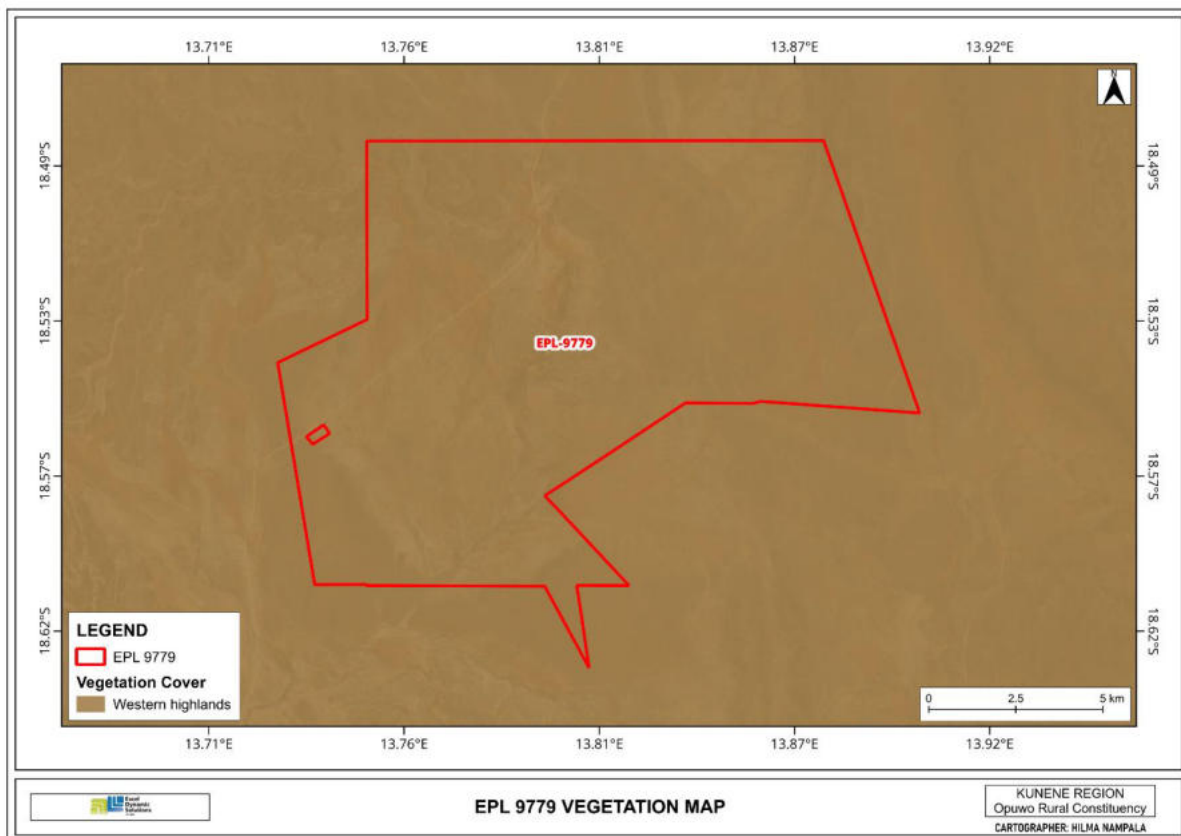


Figure 9: Vegetation map for EPL 9779.

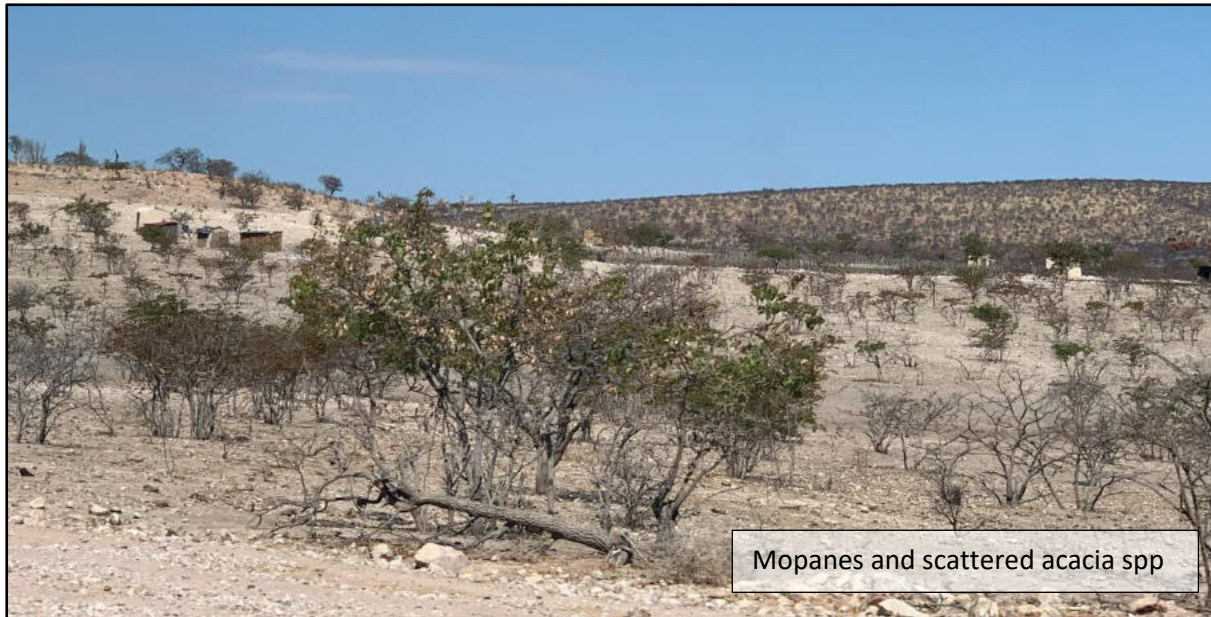


Figure 10: Typical vegetation on EPL 9779.

5.1.6.2 Fauna

The EPL is located at an area where three conservancy boundaries meet namely the Okatjandja kozomenje, Okangundumba and Ombujokanguindi conservancies. These conservancies are known to support populations of Elephants, Ostriches, springbok. Inferring from the Atlas of Namibia Team (2022) the area sustains a rich faunal collection, including an estimated 76–80 mammal species, of which 3–4 are large herbivores and 14–17 are large carnivores. The area also hosts 81-110 bird species, 61-70 reptile species, and approximately 9–12 amphibian species. Invertebrate diversity is comparatively lower, with fewer than two nematode species, 14–20 beetle species, and 3–4 Solifugae species. **Figure 11** shows the observed fauna on around the EPL.



Figure 11: Observed (sheep) on the EPL.

5.2 Heritage and Archaeology

5.2.1 Local Level and Archaeological Findings

Kunene region is rich in archaeological and cultural heritage. Scattered stone tools, pottery fragments, and burial sites have been recorded across the Kaokoveld, indicating long-term occupation by early pastoralists and hunter-gatherer communities. Rock engravings and paintings are present in parts of the region. Graves and cultural sites should be respected and demarcated as no-go zones if discovered. Archaeologically significant resources may be discovered during exploration activities therefore, it is highly recommended that the National Heritage act, 27 of 2004 should be adhered on site, and a qualified archaeologist should always be onsite and/or on standby/call during the exploration phase to ensure that no archaeological resources that may be discovered on site are affected/ damaged.

Section 55 (4) of the National Heritage Act, No. 27 of 2004, requires that any archaeological or paleontological object or meteorite discovered is reported to the National Heritage Council as soon as practicable.

5.3 Surrounding Land Uses

The EPL is situated within the Okangundumba, Okatjandja kozomenje and Ombujokanguidi conservancies, a community-based conservation areas proclaimed under the Nature Conservation Ordinance (1975). The primary land use is communal livestock farming, with cattle, goats, and sheep being the main sources of livelihood. Subsistence crop farming occurs

in low-lying areas where soil moisture permits. Conservancies also promote eco-tourism and wildlife conservation as complementary land uses. Furthermore, Otwani is intrinsically linked to mining. A significant portion of the local population depends on small-scale mining for their livelihood. This reliance is visibly evidenced by the numerous mining claims in the surrounding area from the mining cadastre.

Communal tenure systems prevail, and land use rights are administered through traditional authorities in collaboration with the conservancy management committees. The coexistence of mining, conservation, and agriculture must therefore be carefully managed.

The EPL falls within communal land and covers Okangundumba, Okatjandja kozomenje and Ombujokanguidi conservancies as shown in **Figure 13**. The Proponent is required to secure a signed agreement from the affected landowners to gain access to the areas of interest for prospecting and exploration investigations as per Section 52 of the Minerals (Prospecting and Mining) Act No. 33 of 1992 and Section 2.2.3 of the Minerals Policy of Namibia.

1. Section 52 (1) The holder of the mineral license shall not exercise any rights conferred upon such holder by this Act or under any terms and conditions of such mineral license
 - (a) In, on, or under any and until such holder has agreed in writing with the owner of such land containing terms and conditions relating to the payment of compensation, or the owner of such land has in writing waived any right to such compensation and has submitted a copy of such agreement or waiver to the Commissioner.

Section 2.2.3 of the Draft Minerals Policy of Namibia states that the License Holder and/or mineral explorers currently have to negotiate a contract with landowners to gain access for mining purposes.

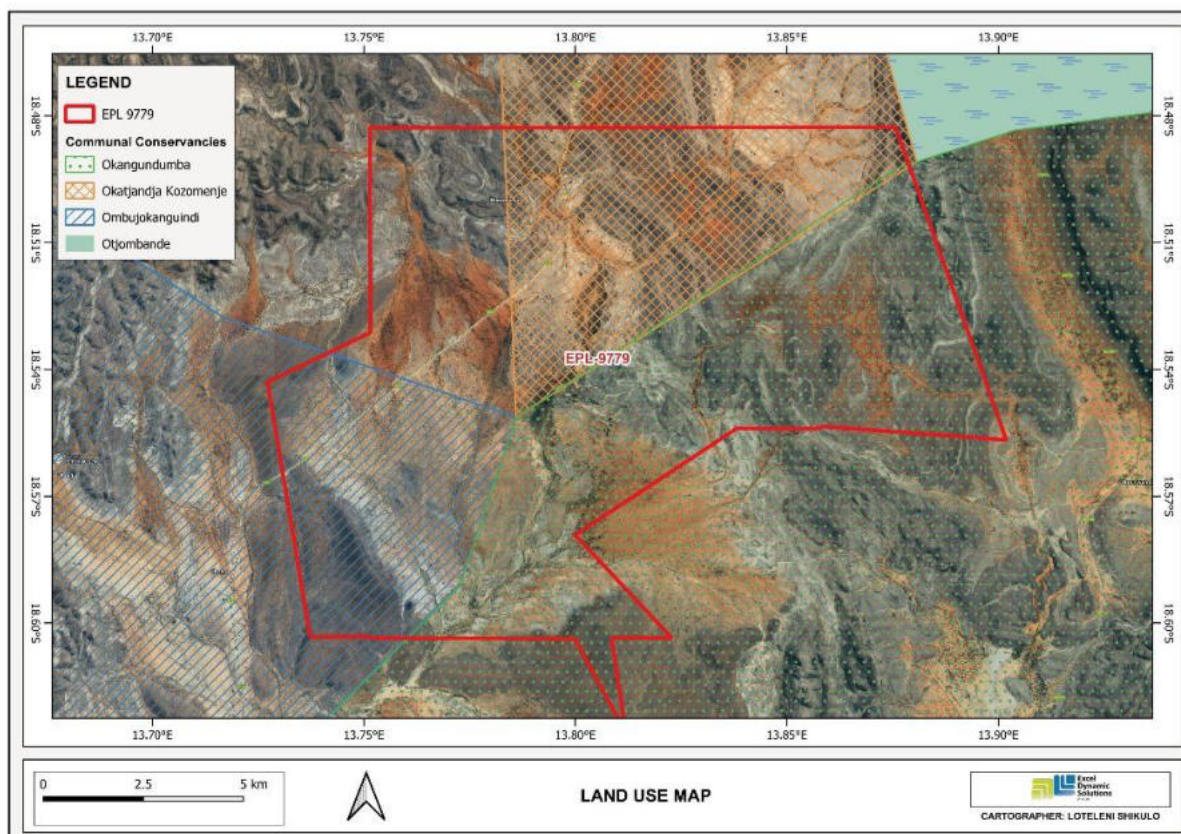


Figure 12: Land use map for EPL 9779.

5.4 Socio-Economic conditions

5.4.1.1 Location and Population Demographic

According to the 2023 Population and Housing Census, according to the 2023 Population and Housing Census, Opuwo rural constituency has a total population of 14,894 of which 7 625 are males while 7,269 are females. The total area size of Opuwo rural constituency is 21 544.91 square kilometres representing a population density of 0.7 inhabitants, among the least populated constituency in the region. Opuwo rural constituency has 13,251 household population, 3 375 households representing an average household size of 3.9 (NSA, 2024).

5.4.1.2 Economic Activities, Livelihood, and Source of Income

Opuwo rural constituency’s main economic activities are in agriculture communal livestock farming, conservancies trophy hunting, and copper mining at Otuani. The communal farmers generally sell their livestock through Meatco auctions and day-to-day bargaining with Angolans and local people from the northern urban areas who are engaged in “Kapana” businesses. Moreover, the constituency is rich in minerals (gems/precious natural stones, copper and iron ore, but they are not yet fully explored to the benefit of the local people, such as in job creation and value addition). The discovery of iron ore and copper in the mountains around the Opuwo

town puts the town in a favourable position for the establishment of processing plants and industrial areas. This will result in job creation and value addition development of a manufacturing sector for its products, such as steel factories and others.

5.4.1.3 Mining

Kunene Region offers great opportunities for mineral exploration due to its rock and mountainous formations, which are pivotal for regional economic growth and development. Exploration and discovery of mineral resources is at an advanced stage and if found economically viable, could contribute significantly to the economic growth of the region. Opuwo rural constituency has great potential of becoming the mining hub of the Kunene region through setting up or establishing a copper processing plant at Otuni. Many local livelihoods depend on small-scale mining, as the area is rich in mineral resources, particularly copper ore. Community members expressed concern that applicants and holders of EPLs are often unwilling to grant consent for small-scale mining activities, which can leave small scale miners without alternative livelihood opportunities, especially in cases where no active prospecting is being undertaken within the EPL area.

5.4.1.4 Tourism

Tourism plays a vital role in fostering socio-economic growth in the Kunene region by generating employment opportunities, supporting local businesses, and preserving cultural heritage. Renowned for its dramatic landscapes, rich biodiversity, and the indigenous Himba people, the region attracts tourists seeking immersive cultural and eco-tourism experiences. Among its most notable attractions is Epupa Falls, where the Kunene River plunges over a 1.5 km stretch, producing a foaming spectacle Epupa meaning "foam" in the Herero language. Visitors engage in activities such as birdwatching and hiking along the falls. Further south, the Burnt Mountain presents a striking volcanic formation, while the nearby Petrified Forest features ancient fossilized trees shaped by geological processes over millennia. According to the Kunene Regional Council (2015), the region is home to 46% of Namibia's conservancies, which play a crucial role in protecting desert-adapted wildlife, including elephants, rhinos, lions, and giraffes. These conservancies facilitate expert-guided tours, promoting environmental education and sustainable tourism practices.

6 PUBLIC CONSULTATION PROCESS

Public consultation is an important component of the Environmental Assessment (EA) process. It provides potential Interested and Affected Parties (I&APs) with an opportunity to comment on and raise any issues relevant to the project for consideration in part of the assessment process. Public input assists the Environmental Assessment Practitioner (EAP) in identifying all potential impacts and the extent to which further investigations are necessary. Public consultation can also aid in the process of identifying possible mitigation measures. Public consultation for this scoping study has been done following the EMA and its EIA Regulations.

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

Relevant and applicable national, regional, and local authorities and other interested members of the public were identified. Pre-identified I&APs were contacted directly, while other parties who contacted the Consultant after project advertisement notices in the newspapers, were registered as I&APs upon their request. Newspaper advertisements of the proposed exploration activities were placed in two widely read national newspapers in the region (New Era Newspaper and The Namibian Newspaper). The project advertisement/announcement ran for two consecutive weeks inviting members of the public to register as I&APs and submit their comments. The summary of pre-identified and registered I&APs is listed in **Table 5** below and the complete list of I&APs is provided in **Appendix D**.

Table 5: Summary of Interested and Affected Parties (I&APs)

National (Ministries and State-Owned Enterprises)
Ministry of Environment and Tourism
Ministry of Industries, Mines and Energy
Regional, Local, and Traditional Authorities
Kunene Regional Council and Opuwo-rural constituency
Okorosavne, Otjikaoko, Ombombo and Otjahorovara Traditional Authorities
Okangundumba, Okatjandja kozomenje and Ombujokanguidi conservancies
General Public
Landowners /Interested members of the public

6.2 Communication with I&APs

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

- A Background Information Document (BID) containing brief information about the proposed exploration works was compiled and emailed to registered and Identified Interested and Affected Parties (I&APs);
- Project Environmental Assessment notices were published in the New Era Newspaper (18 August 2025 and 25 August 2025), and The Namibian Newspaper (15 August 2025 and 22 August 2025), briefly explaining the activity and its locality and inviting members of the public to register as I&APs and submit their comments/concerns.
- Public notice to inform members of the public about the EIA process was placed at Kunene Regional Council (Figure 15) and Opuwo-rural constituency (Figure 16).
- Public meeting was scheduled and held on 27th of October at Opuwo rural constituency office.

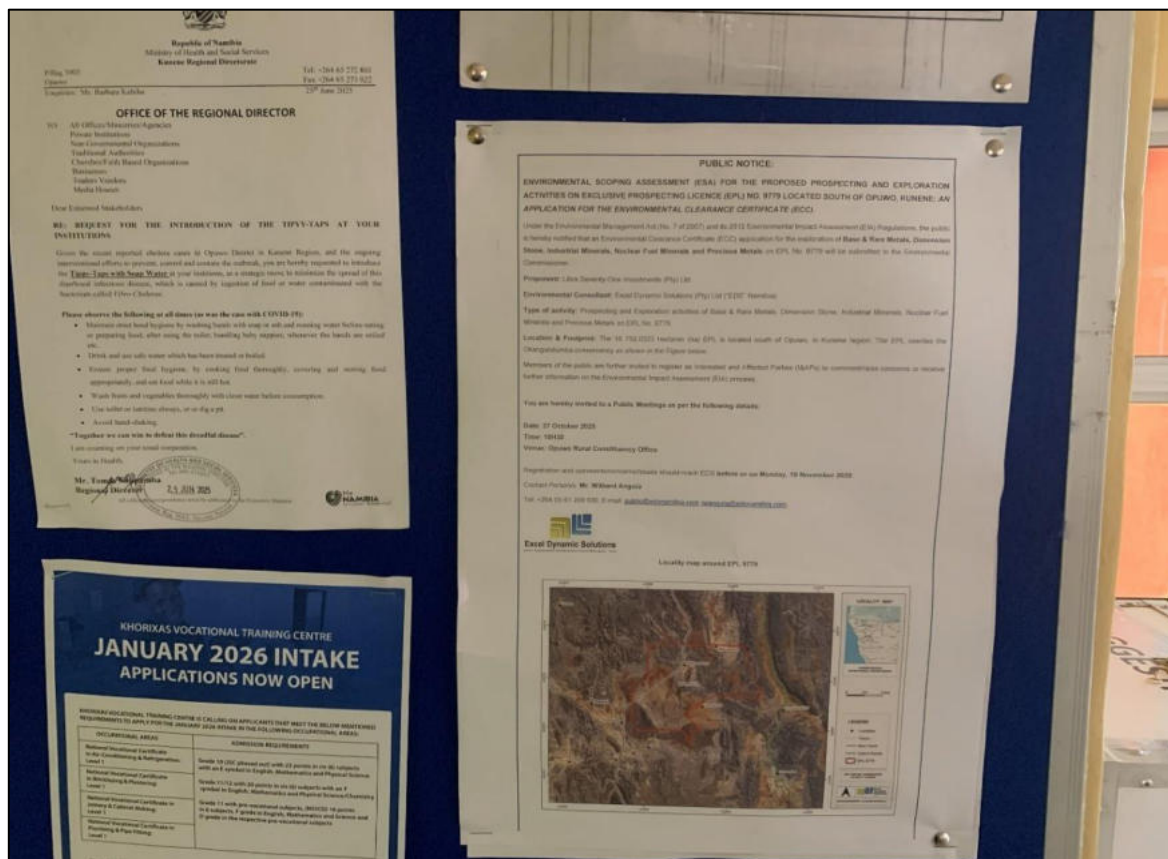


Figure 13: Public notice at Kunene Regional Council.

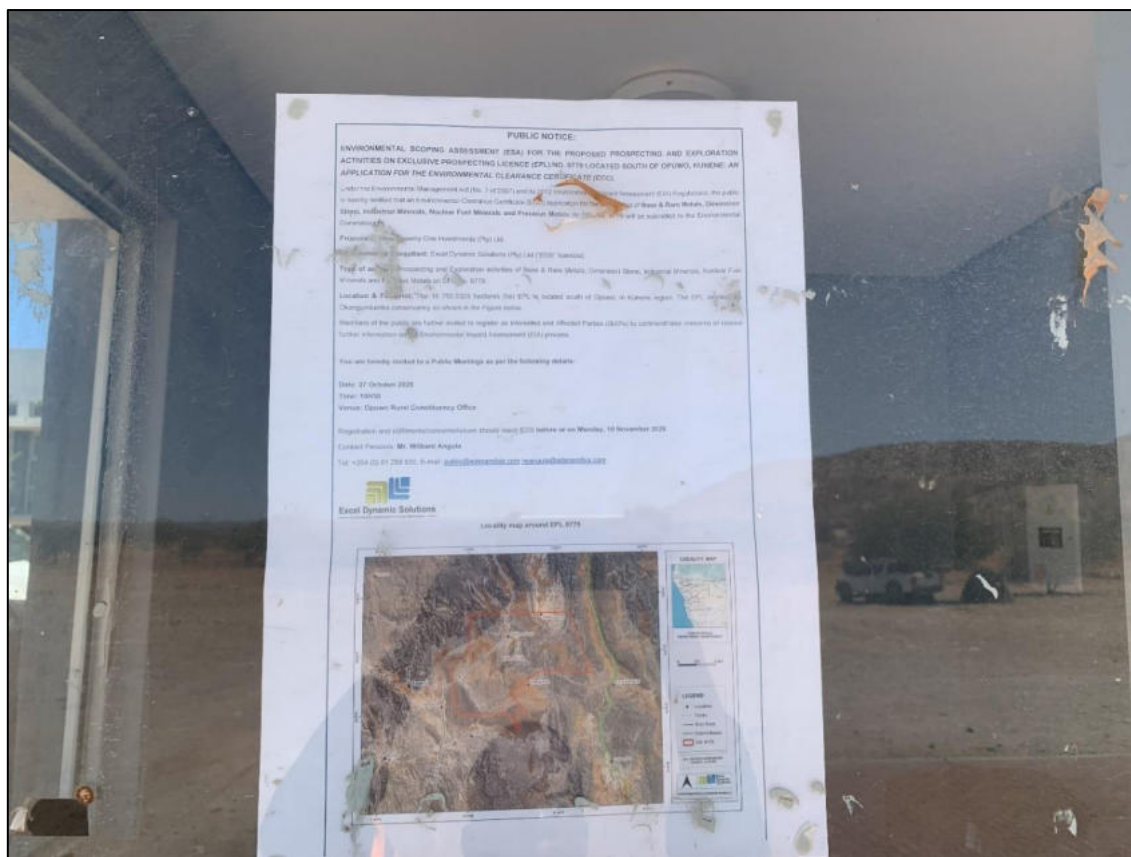


Figure 14: Public notice at Opuwo rural constituency.

Issue raised by I&APs have been recorded and incorporated in the environmental report and EMP. The summarized issues raised during the public meeting are presented in **Table 6** below. The issues raised and responses by EDS are attached under **Appendix G**.

Table 6: Summary of main issues raised, and comments received during public meeting engagements

Issue	Concern Raised by Stakeholders
Restriction of access to mineral resources for small-scale miners.	Community members raised concerns that the granting of an EPL may limit opportunities for small-scale miners within the licence area,
Community rejection of the EPL	Community rejection of the proposed projects because small-scale miners are subjected to the approval of the EPL holder. This may affect informal livelihoods and contribute to negative perceptions of exclusion from mineral resources.

7 IMPACT IDENTIFICATION, ASSESSMENT AND MITIGATION MEASURES

7.1 Impact Identification

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

Positive impacts:

- Creation of jobs for the locals (primary, secondary, and tertiary employment).
- Producing a trained workforce and small businesses that can service communities and may initiate related businesses.
- Boosting local economic growth.
- Open up other investment opportunities and infrastructure-related development benefits.

Negative impacts:

- Potential restriction of access to mineral resources for small-scale miners
- Disturbance to grazing areas
- Land degradation and Biodiversity Loss
- Generation of dust
- Water Resources Use
- Soil & Water Resources Pollution
- Waste Generation
- Occupational Health & Safety risks
- Vehicular Traffic Use & Safety
- Noise & Vibrations
- Disturbance to Archaeological & Heritage Resources
- Impacts on local Roads
- Social Nuisance: local property intrusion & disturbance
- Social Nuisance: Job seeking & differing Norms, Culture & values
- Impacts associated with closure and decommissioning of exploration works

7.2 Impact Assessment Methodology

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

The identified impacts were assessed in terms of scale/extent (spatial scale), duration (temporal scale), magnitude (severity), and probability (likelihood of occurring), as presented in **Table 7**, **Table 8**, **Table 9**, and **Table 10** respectively.

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

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

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

7.2.1 Extent (spatial scale)

The extent is an indication of the physical and spatial scale of the impact. **Table 7** shows the rating of impact in terms of the extent of spatial scale.

Table 7: Extent or spatial impact rating

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

7.2.2 Duration

Duration refers to the timeframe over which the impact is expected to occur, measured concerning the lifetime of the project. **Table 8** shows the rating of impact in terms of duration.

Table 8:Duration impact rating

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

7.2.3 Intensity, Magnitude/severity

Intensity refers to the degree or magnitude to which the impact alters the functioning of an element of the environment. The magnitude of alteration can either be positive or negative. These ratings were also taken into consideration during the assessment of severity. **Table 9** shows the rating of impact in terms of intensity, magnitude, or severity.

Table 9:Intensity, magnitude, or severity impact rating

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

7.2.4 Probability of occurrence

Probability describes the likelihood of the impacts occurring. This determination is based on previous experience with similar projects and/or based on professional judgment. **Table 10** shows impact rating in terms of probability of occurrence.

Table 10:Probability of occurrence impact rating

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

7.2.5 Significance

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

Once the above factors (**Table 8, Table 9, Table 10** and **Table 7**) have been ranked for each potential impact, the impact significance of each is assessed using the following formula:

SIGNIFICANCE POINTS (SP) = (MAGNITUDE + DURATION + SCALE) X PROBABILITY

The maximum value per potential impact is 100 significance points (SP). Potential impacts were rated as high, moderate, or low significance, based on the following significance rating scale (**Table 11**).

Table 11:Significance rating scale

Significance	Environmental Significance Points	Colour Code
High (positive)	>60	H
Medium (positive)	30 to 60	M
Low (positive)	1 to 30	L

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

Positive (+) – Beneficial impact

Negative (-) – Deleterious/ adverse+ Impact

Neutral – Impacts are neither beneficial nor adverse

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

The assessment of the exploration phases is done for pre-mitigation and post-mitigation.

The risk/impact assessment is driven by three factors:

Source: The cause or source of the contamination.

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

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

A pollutant linkage occurs when a source, pathway, and receptor exist together. Mitigation measures aim firstly, to avoid risk and if the risk cannot be avoided, mitigation measures to minimize the impact are recommended. Once mitigation measures have been applied, the identified risk would reduce to lower significance (Booth, P., 2011).

This assessment focuses on the three project phases namely, prospecting, exploration (and possible analysis), and decommissioning. The potential negative impacts stemming from the proposed activities of the EPL are described and assessed and mitigation measures are provided thereof. Further mitigation measures in a form of management action plans are provided in the Draft Environmental Management Plan.

7.3 Assessment of Potential Negative Impacts

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

7.3.1 Disturbance to the grazing areas

The EPL is overlying communal land that have livestock and wildlife. Exploration activities such as site clearing, trenching, and drilling can potentially lead to the disturbance of grazing land. This will potentially affect the grazing land available to wildlife, and since the wildlife greatly depends on the little available flora, their livelihood will be impacted.

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

- **Impact:** Temporary loss of grazing land due to drilling pads, trenches, or access roads.
- **Mitigation:** Utilize established tracks; rehabilitate all disturbed sites without delay; obtain prior engagement with local herders before land access.

The impact is assessed in **Table 12** below.

Table 12: Assessment of the impacts of exploration on grazing areas

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H: -4	M: -3	M: -4	M/H: 5	M: -55
Post mitigation	L/M: -2	L/M: -2	L/M: -2	L/M: 3	L: -24

7.3.2 Land Degradation and Loss of Biodiversity

Fauna: The trenching, pitting, and drilling activities carried out during exploration would result in land degradation, leading to habitat loss for a diversity of flora and fauna ranging from microorganisms to large animals and trees. Endemic species are most at risk since even the slightest disruption in their habitat can result in extinction.

The presence and movement of the exploration workforce and operation of project equipment and heavy vehicles would disturb livestock and wildlife present. The proposed activities may also carry the risk of the potential illegal hunting of local wildlife. This could lead to the reduction of specific faunal species, which may limit tourism (sightseeing and safari) activity in the area.

Additionally, if the exploration sites are not rehabilitated, they could pose a high risk of injuries to animals by falling into holes and pits.

Flora: Direct impact of exploration works on flora will mainly occur through clearing for exploration access routes and associated infrastructure. The dust emissions from drilling may also affect surrounding vegetation through the fall of dust, if excessive. Some loss of vegetation is an inevitable consequence of the development. However, given a moderate abundance of vegetation and site-specific areas of exploration on the EPL, the impact will be localized, therefore manageable.

Under the status, the impact can be of a medium significance rating. With the implementation of appropriate mitigation measures, the rating will be reduced to a low significance rating.

- **Impact:** Clearing of vegetation, disturbance of mopane woodland, risk of invasive species.
- **Mitigation:** Restrict vegetation clearing to active exploration sites; Implement immediate rehabilitation of all cleared areas; Train all workers in biodiversity awareness and protection; Designate and enforce no-go zones for ecologically sensitive habitats.

The impact is assessed in **Table 13** below.

Table 13: Assessment of the impacts of exploration on biodiversity

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H: -4	M/H: -4	M: -6	M/H: 4	M: -56
Post mitigation	L/M: -2	L/M: -2	L/M: -2	L/M: 3	L: -18

7.3.3 Generation of Dust (Air Quality)

Dust emanating from site access routes when transporting exploration equipment and supply to and from the site may compromise the air quality in the area. Vehicular movements from heavy vehicles such as trucks would potentially create dust, even if it is not anticipated to be low. Additionally, activities carried out as part of the exploration works such as drilling would contribute to the dust levels in the air. The medium significance of this impact can be reduced to a low significance rating by properly implementing mitigation measures.

- **Impact:** Dust from drilling, vehicle movement, and trenching.
- **Mitigation:** Water spraying during drilling; limit speed of vehicles; cover transported materials.

The impact is assessed in **Table 14** below.

Table 14: Assessment of the impacts of exploration on air quality

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: -3	M: -3	M/L: -4	M/H: 4	M: -40
Post mitigation	L/M: - 2	L/M: - 2	L/M: - 2	L/M - 2	L - 12

7.3.4 Water Resources Use

Water resources are impacted by project developments/activities in two ways - through pollution (water quality) or over-abstraction (water quantity) or at times both.

The abstraction of more water than can be replenished from low groundwater potential areas would negatively affect the local communities (communal and livestock) that depend on the same low potential groundwater resource (aquifer).

The impact of the project activities on the resources would be dependent on the water volumes required by each project activity. Exploration activities use a lot of water, mainly for drilling. However, this depends on the type of drilling methods employed (diamond drilling is more water-consuming compared to drilling methods such as reverse circulation for instance) and the type of mineral being explored.

The drilling method to be employed for this project's exploration activities is Diamond core drilling. Given the low to medium groundwater potential of some project site areas, the Proponent may consider carting some of the water volumes from outside the area and stored in industry-standard water reservoirs/tanks on site. The exact amounts of water required for proposed operations would be dependent on the duration of the exploration works and the number of exploration boreholes required to make a reliable interpretation of the commodities explored. The exploration period is temporally limited, therefore, the impact will only last for the duration of the exploration activities, and ceases upon their completion.

Without the implementation of any mitigation measures, the impact can be rated as medium, but upon effective implementation of the recommended measures, the impact significance would be reduced to low as presented in **Table 15** below.

- **Impact:** Pressure on limited groundwater; potential contamination from drilling fluids.
- **Mitigation:** Obtain water permits; monitor borehole abstraction; prevent leaks/spills; install drip trays at fuel storage; use biodegradable drilling fluids.

Table 15: Assessment of the project impact on water resource use and availability

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M - 3	M/H - 3	L/M - 4	M/H - 4	M - 40
Post mitigation	L/M - 1	L/M - 1	L - 2	L/M - 3	L - 12

7.3.5 Soil and Water Resources Pollution

The proposed exploration activities are associated with a variety of potential pollution sources (i.e., lubricants, fuel, and wastewater) that may contaminate/pollute soils, and eventually, surface and groundwater. The anticipated potential source of pollution to water resources from the project activities would be hydrocarbons (oil) from project vehicles, machinery, and equipment as well as potential wastewater/effluent from exploration-related activities.

The spills (depending on volumes spilled on the soils) from machinery, vehicles, and equipment could infiltrate into the ground and pollute the fractured or faulted aquifers on site, and with time reach further groundwater systems in the area. However, it should be noted that the scale and extent/footprint of the activities where potential sources of pollution will be handled is relatively small. Therefore, the impact will be moderately low.

Pre-implementation of the mitigation measures, the impact significance is medium to high and upon implementation, the significance will be reduced to moderate.

- **Impact:** Fuel/oil leaks from machinery, improper waste disposal.
- **Mitigation:** Use spill kits; store fuel in bunded tanks; separate waste streams; dispose of waste at licensed facilities.

The impact is assessed in **Table 16** below.

Table 16: Assessment of the project impact on soils and water resources (pollution)

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H - 4	M/H - 4	M - 6	M/H - 4	M - 56
Post mitigation	L/M: - 2	L/M - 2	L/M - 2	L/M - 2	L - 12

7.3.6 Waste Generation

During the prospecting and exploration program, domestic and general waste is produced on-site. If the generated waste is not disposed of responsibly, land pollution may occur on the EPL or around the sites. The EPL is in an area of moderate sensitivity to pollution. Improper

handling, storage, and disposal of hydrocarbon products and hazardous materials at the site may lead to soil and groundwater contamination, in case of spills and leakages. Therefore, the exploration program needs to have appropriate waste management for the site. To prevent these issues, any hazardous waste that may have an impact on animals, vegetation, water resources, and the general environment should be handled cautiously. Without any mitigation measures, the general impact of waste generation has a medium significance. The impact will reduce to low significance, upon implementing the mitigation measures.

- **Impact:** Domestic and hazardous waste accumulation on site.
- **Mitigation:** Provide labelled bins; regular collection and transport to authorized landfill; no onsite burning or burying of waste.

The assessment of this impact is given in **Table 17** below.

Table 17: Assessment of waste generation impact

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M: - 3	M: - 3	L/M: - 4	M/H: - 4	M: -40
Post mitigation	L: - 1	L: - 1	L: - 2	L/M: - 2	L - 8

7.3.7 Occupational Health and Safety Risks

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

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

The impact is probable and has a medium significance rating. However, with adequate mitigation measures, the impact rating will be reduced to low.

- **Impact:** Injuries from drilling operations, dust inhalation, noise exposure.

- **Mitigation:** Enforce PPE usage; provide first aid kits; implement health & safety induction; limit working hours.

This impact is assessed in **Table 18** below and mitigation measures are provided.

Table 18: Assessment of the impacts of exploration on health and safety

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M - 3	M/L - 2	M - 6	M/H - 4	M - 44
Post mitigation	L/M - 2	L/M - 2	L - 2	L/M - 2	L - 12

7.3.8 Vehicular Traffic Use and Safety

The EPL is accessible via C43 and D3707 in Kunene Region. These are some of the main transportation routes for all vehicular movement in the area and provide access to the EPL and connect the project area to other towns. Traffic volume will therefore increase on these district roads during exploration as the project would need delivery of supplies and services on site.

Depending on the project needs, trucks, medium-sized vehicles, and small vehicles will frequent the area to and from exploration sites on the EPL. This would potentially increase slow-moving heavy vehicular traffic along these roads and add additional pressure on the roads. However, transportation of materials and equipment is expected to occur on a limited schedule and only for the duration of the project. Therefore, the risk is anticipated to be short-term, not frequent, and therefore of medium significance. Before mitigation, the impact can be rated medium and with the implementation of mitigation measures, the significance will be low as assessed in **Table 19** below.

- **Impact:** Increased heavy vehicle movement causing road damage and safety risks.
- **Mitigation:** Use existing roads where possible; enforce speed limits; maintain vehicles; consult local authorities on road use.

Table 19: Assessment of the impacts of exploration on-road use (vehicular traffic)

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H - 4	M/H - 3	L/M - 4	H - 5	M - 55
Post mitigation	L/M - 2	L/M - 2	L - 2	L/M - 2	L - 12

7.3.9 Noise and vibrations

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

- **Impact:** Noise from drilling machinery disturbing communities and wildlife.
- **Mitigation:** Daytime operations only; fit silencers on equipment; maintain buffer zones around settlements.

This impact is assessed in **Table 20** below.

Table 20: Assessment of the impacts of noise and vibrations from exploration

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	L/M - 2	L/M - 2	M - 6	M/H - 3	M – 30
Post mitigation	L - 1	L/M - 2	L - 2	L/M -2	L - 10

7.3.10 Disturbance to Archaeological and Heritage Resources

The specialist archaeological assessment conducted, indicates that Kunene Region is sensitive and contains archaeological/cultural significant sites, and there is a possibility of unveiling/discovering new archaeological and/or cultural materials in the proposed project area. If such Materials are found the areas must be mapped out and coordinates taken to establish “No-Go-Areas”, due to their sensitivity and then documented. They may be protected either by fencing them off or demarcation for preservation purposes, or excluding them from any development i.e., no exploration activities should be conducted near these recorded areas through the establishment of buffer zones.

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

- **Impact:** Possible destruction of graves, stone tools, or cultural sites.
- **Mitigation:** Conduct heritage surveys before works; enforce chance find procedures; demarcate no-go zones for discovered site

The impact is assessed in **Table 21**.

Table 21: Assessment of the impacts of exploration on archaeological & heritage resources

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M – 3	M/H - 4	M - 6	M/H - 4	M – 52
Post mitigation	L/M – 2	L/M - 2	L - 2	L/M - 2	L - 12

7.3.11 Impact on Local Roads/Routes

Exploration projects are usually associated with the movements of heavy trucks and equipment or machinery that use local roads. Heavy vehicles traveling on local roads exert pressure on the roads and may make the roads difficult to use. This will be a concern if maintenance and care is not taken during the exploration phase. The impact would be short-term (during exploration only) and therefore, manageable.

Without any management and or mitigation measures, the impact can be rated as medium and to reduce this rating to low, the measures will need to be effectively implemented. The assessment of this impact is presented in **Table 22**.

Table 22: Assessment of exploration of local services (roads and water)

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H – 4	M - 3	M - 6	M - 3	M – 39
Post mitigation	L – 1	L - 1	M/L - 4	M/L - 2	L - 12

7.3.12 Social Nuisance: Local Property intrusion and Disturbance/Damage

The presence of some non-resident workers may lead to social annoyance to the local community. This could particularly be a concern if they enter or damage local private property. The private properties of the locals may include houses, fences, vegetation, livestock, wildlife, or any properties of economic or cultural value to land users. The damage or disturbance to properties may not only be private but local public properties. The unpermitted and unauthorized entry to private property may cause clashes between the affected property (land) owners and the Proponent.

The impact is rated as of medium significance. However, upon mitigation (post-mitigation), the significance will change from a medium to a low rating. With implementation of the above measures, residual socio-economic impacts related to perceptions of exclusion are expected to be reduced; however, final decisions regarding access to mineral resources remain the responsibility of the competent authority.

- **Impact:** Theft, property damage, community-worker tensions, Potential conflict between EPL holders and local miners.
- **Mitigation:** Engage community leaders; enforce code of conduct; provide grievance redress mechanism, Development of a co-existence or access framework where feasible, maintain open communication with affected communities regarding the rights associated with an EPL, including clarification of areas where small scale mining may or may not be legally permissible.

The impact is assessed below (**Table 23**).

Table 23: Assessment of the social impact of community property damage or disturbance

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H - 4	M - 3	M - 4	M/H- 4	M – 44
Post mitigation	L/M - 2	L - 1	L - 2	M/L -2	L - 10

7.3.13 Impact on small-scale miners:

The presence of small-scale miners in the area is objecting to the formalization of the EPL because from past experience EPL holders do not want to give consent to small-scale miners within the EPL. The holder. The objection is cited as having direct negative consequences for community socio-economic livelihoods in the Opuwo Rural Constituency, where small-scale mining constitutes a primary or supplementary source of income for a significant proportion of households. The Minerals (Prospecting and Mining) Act, 1992 (Act No. 33 of 1992) discusses upon the holder of an EPL the right of first refusal regarding access to and activities within the EPL boundary. Section 52(2) of the Act further requires that any other person wishing to exercise mineral rights within an EPL must obtain the written consent of the EPL holder. This statutory arrangement has the practical effect of placing full control over access within the EPL in the hands of the licence holder, leaving small-scale miners without a guaranteed right of access irrespective of whether the EPL holder is actively prospecting in the relevant portion of the licence area.

The impact is rated as of medium significance. However, upon mitigation (post-mitigation), the significance will change from a medium to a low rating. It is noted that a residual significance impact is expected to remain even with full implementation of mitigation measures. This reflects the inherent structural tension between exclusive prospecting rights and community livelihood access that exists within the current legislative framework, and cannot be fully resolved through project-level measures alone. The significance reduction from High (-56) to Low (-16) is, however, substantial and is contingent on the Proponent acting in good faith in the implementation of all measures described below.

however, final decisions regarding access to mineral resources remain the responsibility of the competent authority.

- **Impact:** Proponent may lawfully deny access, Potential for heightened social conflict between the Proponent and affected communities, including the possibility of illegal entry onto the EPL, Perceptions of dispossession and exclusion from resources that communities regard as their own, effect on Community members livelihood who depend on small-scale mining.
- **Mitigation:** Co-existence Procedure, Grievance Mechanism, maintain ongoing stakeholder engagement throughout, Ensure statutory consultation and consent compliance.

The impact is assessed below (**Table 23**).

Table 24: Assessment of the social impact on small scale miners

Mitigation Status	Extent	Duration	Intensity	Probability	Significance
Pre mitigation	M/H - 4	M/H - 4	M/H - 6	M/H- 4	M – 56
Post mitigation	L/M - 2	L/M - 2	L/M - 4	M/L -2	L - 16

7.4 Cumulative Impacts Associated with Proposed Exploration

According to the International Finance Corporation (2013), cumulative impacts are defined as “impacts that result from the successive, incremental, and/or combined effects of an action, project, or activity (collectively referred to in this document as “developments”) when added to other existing, planned, and/or reasonably anticipated future impacts”.

Like many other exploration projects, some cumulative impacts to which the proposed project and associated activities potentially contribute, are the:

- **Impact on road infrastructure:** The proposed exploration activities will occur alongside other regional land-use pressures, including agriculture and existing mining operations. Nevertheless, due to the project's limited duration and relatively small spatial footprint, its contribution to cumulative impacts is expected to be insignificant.
- **Use of water:** Although the project's contribution to cumulative impacts is not anticipated to be significant, the implementation of mitigation measures aimed at minimizing water consumption during exploration remains essential to reduce pressure on primary water sources.

Exploration activities within the Okatjandja Kozomenje, Okangundumba, and Ombujokanguindi Conservancies may intensify existing pressures on conservation efforts. Additional cumulative impacts may result from the overlap of exploration operations with established wildlife movement corridors.

. To mitigate cumulative impacts:

- Limit exploration to designated blocks within the EPL.
- Coordinate with conservancy committees to align schedules and land use.
- Promote joint monitoring programs (Proponent + Conservancy).

7.5 Positive Impacts

Employment Opportunities (Skilled and Unskilled)

The project is expected to create both skilled and unskilled job opportunities during the exploration phase. Local residents will benefit from temporary employment, which contributes to reducing unemployment levels in the Kunene Region.

Local Procurement of Goods and Services

Exploration activities will require consumables such as fuel, protective clothing, food, and vehicle maintenance services. Procuring these from local suppliers will stimulate the regional economy and support small businesses.

Skills Transfer and Capacity Building

Involving local workers in exploration activities, the project will provide valuable training and skills transfer. This will improve the long-term employability of individuals in the mining sector and related industries.

Economic Stimulation of Local Businesses

The presence of the project will increase demand for accommodation, catering, and transport services in the surrounding communities. This will boost local enterprises and enhance overall economic activity in the area.

Potential Long-Term Investment in Kunene Region

If exploration results are positive, further investment in mining activities could follow. This has the potential to generate significant long-term economic benefits, including infrastructure development and sustained employment opportunities.

8 RECOMMENDATIONS AND CONCLUSION

8.1 Recommendations

The potential positive and negative impacts of the proposed exploration activities on EPL No. 9779 were identified and assessed and appropriate management and mitigation measures (to negative impacts) were made thereof for implementation by the Proponent, their contractors, and project-related employees.

Mitigation measures for identified issues have been provided in the Environmental Management Plan, for the Proponent to avoid and/or minimize their significant impacts on the environmental and social components. Most of the potential impacts were found to be of medium-rating significance. With effective implementation of the recommended management and mitigation measures, a reduced rating in the significance of adverse impacts is expected from Medium to Low. To maintain the desirable rating, the implementation of management and mitigation measures should be monitored by the Proponent directly, or their Environmental Control Officer (ECO). The monitoring of implementation will not only be done to maintain a low rating but also to ensure that all potential impacts identified in this study and other impacts that might arise during implementation are properly identified in time and addressed right away.

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

8.1.2 Community Objection and Small-Scale Miner Access

During the public consultation process the community members, conservancies and the affected Traditional Authority objected to the EPL on the grounds that it restricts access to mineral resources by small-scale miners who depend on such activities for their primary

livelihoods. While this concern represents a substantive socio-economic concern that must be proactively addressed by the Proponent in order to secure social acceptability of the project.

The following measures are recommended to address this concern:

- The Proponent must enter into a formal written Community Access Agreement or Co-existence Protocol with each of the three affected conservancy committees and the relevant Traditional Authorities prior to commencing any field activities, as required under Section 52 of the Minerals (Prospecting and Mining) Act, 1992.
- A Community Liaison Committee (CLC) must be established, comprising representatives from the conservancy management committees, Traditional Authorities, small-scale miners, and the Proponent. The CLC must convene at least quarterly during the exploration phase.

Based on the findings of the Environmental Scoping Assessment for EPL 9779, the following recommendations are proposed:

- Environmental Clearance Certificate (ECC): It is recommended that the Ministry of Environment, Forestry and Tourism (MEFT) grants the ECC for exploration activities, subject to strict adherence to the Environmental Management Act (2007) and its regulations.
- Implementation of the Environmental Management Plan (EMP): The proponent must implement the EMP as an operational guide for managing all identified impacts. This should include regular monitoring, reporting, and compliance audits.
- Water Resource Management: Given the scarcity of water in the Kunene Region, water-use permits must be obtained. Groundwater abstraction should be monitored, and alternative water sources (such as water trucking) should be considered to minimize pressure on local aquifers.
- Community Engagement: Continuous stakeholder and community engagement with the Okatjandja kozomenje, Okangundumba and Ombujokanguindi conservancies and local traditional authorities is essential. Clear communication channels must be maintained to address grievances, promote transparency, and ensure local participation.
- Biodiversity Conservation: Exploration should avoid ecologically sensitive zones, wildlife corridors, and areas of high biodiversity importance. Rehabilitation of disturbed areas must be prioritized to restore natural vegetation.

- **Health and Safety:** All exploration activities should adhere to occupational health and safety standards. Training, provision of PPE, and emergency preparedness must be mandatory for all employees and contractors.
- **Cultural and Heritage Preservation:** Heritage chance find procedures must be strictly implemented. Any cultural or archaeological resources encountered must be reported immediately to the National Heritage Council.
- **Cumulative Impact Monitoring:** The proponent should work closely with the conservancy management to track cumulative impacts on grazing land, wildlife, and local livelihoods. Joint monitoring initiatives will strengthen compliance and trust with affected communities.
- **Clear stakeholder engagement** is recommended prior and throughout the exploration phase to minimise conflict, manage expectations, and promote social acceptability of the proposed activities, recognising that community members retain the right to object through established statutory processes.

8.2 Conclusion

It is crucial for the proponents and their contractors to effectively implement the recommended management and mitigation measures, to protect the biophysical and social environment throughout the project duration. This would be done to promote environmental sustainability while ensuring a smooth and harmonious existence and purpose of the project activities in the community and environment at large. It is also to ensure that all potential impacts identified in this study and other impacts that might arise during implementation are properly identified in time and addressed accordingly. The Environmental Scoping Assessment has identified both potential negative and positive impacts associated with the proposed prospecting and exploration activities under EPL 9779. While risks such as land degradation, biodiversity disturbance, water use, and social conflicts are acknowledged, these can be effectively mitigated through strict adherence to the EMP, regulatory compliance, and proactive stakeholder engagement.

On the other hand, the project presents significant opportunities for local socio-economic upliftment through employment, procurement, and skills development. If responsibly managed, the project can align with Namibia's sustainable development goals, Vision 2030, and the objectives of the Conservancies. It is recommended that the ECC be granted for EPL 9779, subject to compliance with the mitigation measures outlined in this report and the accompanying EMP.

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