



# Namibian Marine Phosphate

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# **REPORT:**

# SUMMARY OF THE PUBLIC CONSULTATION PROCESS, PUBLIC AND STAKEHOLDER MEETINGS AND RELATED COMMENTS FROM I&APS

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### **TERMS AND ABBREVIATIONS**

ABBREVIATIONS	DESCRIPTION	
BCLME	Benguela Large Marine Ecosystem	
BID	background information document	
CEO	Chief Executive Officer	
CSIR	Council for Scientific and Industrial Research	
DFS	definitive feasibility study	
EAP	environmental assessment practitioner	
ECC	Environmental Clearance Certificate	
ECC	Environmental Compliance Consultancy	
EIA	Environmental Impact Assessment	
EMA	Environmental Management Act, No.7 of 2007	
EMP	environmental management plan	
ESIA	environmental and social impact assessment	
GDP	gross domestic produce	
НМ	horse mackerel	
I&APs	interested and affected parties	
MARPOL	International Convention for the Prevention of Pollution from	
	Ships	
MEFT	Ministry of Environment, Forestry and Tourism	
MFMR	Ministry of Fisheries and Marine Resources	
ML	mining licence	
MME	Ministry of Mines and Energy	
NamDeb	Namdeb Diamond Corporation (Pty) Ltd	
NCE	Namibia Chamber of Environment	
NMP	Namibian Marine Phosphate (Pty) Ltd	
NGO's	Non-governmental Organizations	
NUST	Namibia University of Science and Technology	
RoD	record of decision	
SADC	Southern African Development Community	
SP1	initial target area	
ToR	terms of reference	
WLHMA	Wet Landed Horse Mackerel Association	
UAE	United Arab Emirates	
UK	United Kingdom	



# **1 SUMMARY OF PUBLIC CONSULTATION PROCESS**

### 1.1 INTRODUCTION

Environmental Compliance Consultancy (ECC) has been engaged by Namibia Marine Phosphate (Pty) Ltd, the Proponent, to manage the application process for an environmental clearance certificate and to conduct an Environmental Impact Assessment (EIA) in accordance with the Environmental Management Act, No. 7 of 2007 and its regulations of 2012, for which an application for an environmental clearance certificate will be submitted for the mining project activities on ML 170, offshore, Namibia.

The proposed 'Sandpiper Marine Phosphate' Project intends to develop economically viable marine phosphate deposits found on ML 170 using the services of an international dredging company with experience in the application of deep-water (> 100m) dredging techniques.

As detailed in Section 2.4 of the ESIA report, public participation and consultation are a requirement stipulated in the Environmental Impact Assessment Regulations (Regulations 21 and 23) of the EMA 2007 for a project undertaking a listed activity and requires an environmental clearance certificate.

Consultation is a compulsory and critical component of the ESIA process for achieving transparent decision-making and can provide many benefits. Consultation is ongoing during the entire ESIA process up to and completion and submission of final reports to the Environmental Commissioner for review in terms of the EMA 2007.

The objectives of the public participation and consultation process are to:

- Provide information on the Sandpiper Project, introducing the overall project concept and planning in the form of a background information document (BID);
- Determine the relevant government, regional and local regulating authorities;
- Listen to and understand community issues, record concerns and questions; and
- Explain the process of the ESIA and timeframes involved and establish a platform for ongoing consultation.

The prescribed formal requirements for public and stakeholder consultation are well defined in the EMA 2007, which includes issue of notices, public meetings and the distribution of certain reports for comment prior to submission to the relevant authorities.



The objectives of the public and stakeholder consultation process, are further enhanced and consultation is extended by related activities conducted by the proponent and third parties, including local media/press, which also serve to distribute knowledge of and details of the proposed project, as well as the application process being undertaken to the general public and local communities at large. Such activities include media statements, media conferences, public interviews and presentations distributed by the proponent though its own channels (website, social media) as well as reports published and distributed in news media (papers and social media) both locally and nationally by local press/media groups in Namibia, further picked up and distributed internationally by other media.

### 1.2 PUBLIC, STAKEHOLDER AND I&AP CONSULTATION SUMMARY

Figure 1 to Figure 4 presented below provides an overview of the public consultation process that the Proponent has completed since conducting baseline engagement in 2011/2012 until the current 2022 ESIA assessment environmental clearance certificate application.



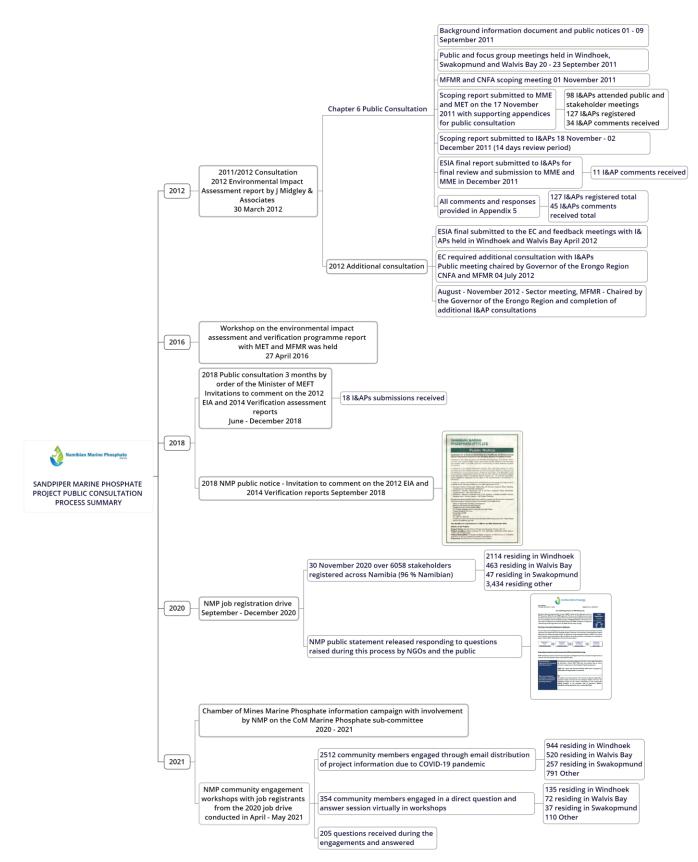


Figure 1 – Overview of the public consultation process from 2011 - 2021



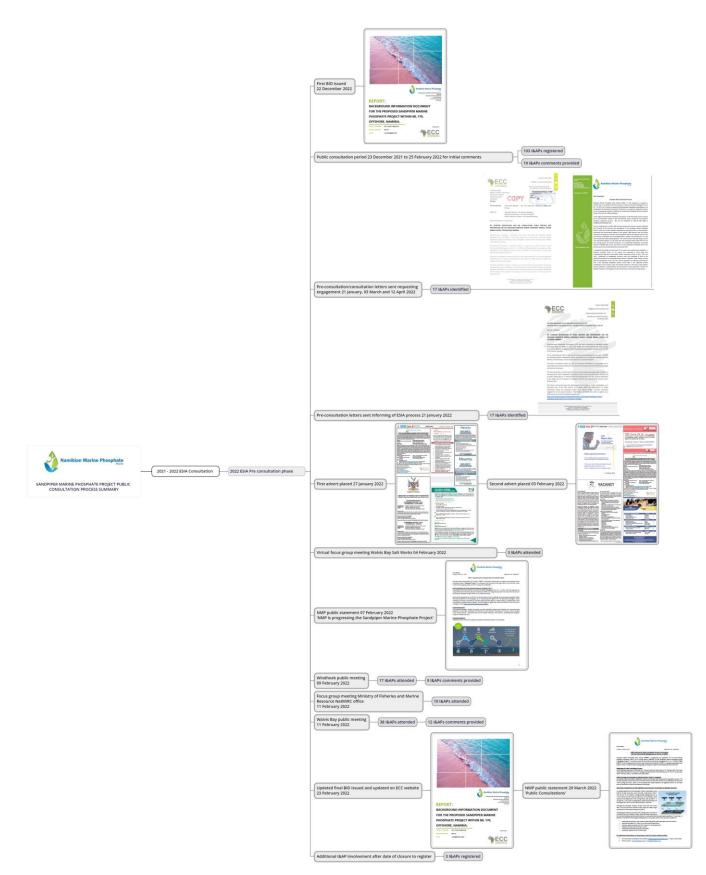


Figure 2 – Overview of the public consultation process from 2021 – 2022 (pre-consultation)



### Summary of the public consultation process, public and stakeholder meetings and related comments from I&APs Namibian Marine Phosphate (Pty) Ltd

I&AP consultation process period 22 April - 06 May 2022 (14 days) 11 I&APs comments received NOTICE BOARD Scoping report physical copies provided at Swakopmund Public Library and Walvis Bay Community Town Hall on the 21 April 2022 Site notices placed Swakopmund and Walvis Bay 21 April 2022 Locations: Swakopmund Municipality notice board, COSDEF Community Center notice board, Walvis Bay Municipality notice board and Walvis Bay Community Town Hall Site notices and physical copy of scoping report placed Windhoek 22 April 2022 Location: Windhoek Public Library LOOKEN Scoping report submitted physically to MFMR and MEFT 28 April 2022 Scoping report submitted physically to MME 22 April 2022 I&APs registered during the scoping phase 4 new I&APs Namibian Marine Phosphate S 2021-2022 ESIA Consultation 2022 ESIA scoping report consult NMP public statement 25 July 2022 The Scoping Stage for the Sandpiper Marine Project's Environmental Clearance Certificate is Complete' SANDPIPER MARINE PHOSPHATE PROJECT PUBLIC CONSULTATION PROCESS SUMMARY This phase information on a building of the W MEFT acceptance of scoping report official letter 30 August 2022 Towns Man . NMP presentation at the Mining EXPO 01 September 2022

Figure 3 – Overview of the public consultation process 2022 (scoping)



Summary of the public consultation process, public and stakeholder meetings and

### related comments from I&APs

Namibian Marine Phosphate (Pty) Ltd

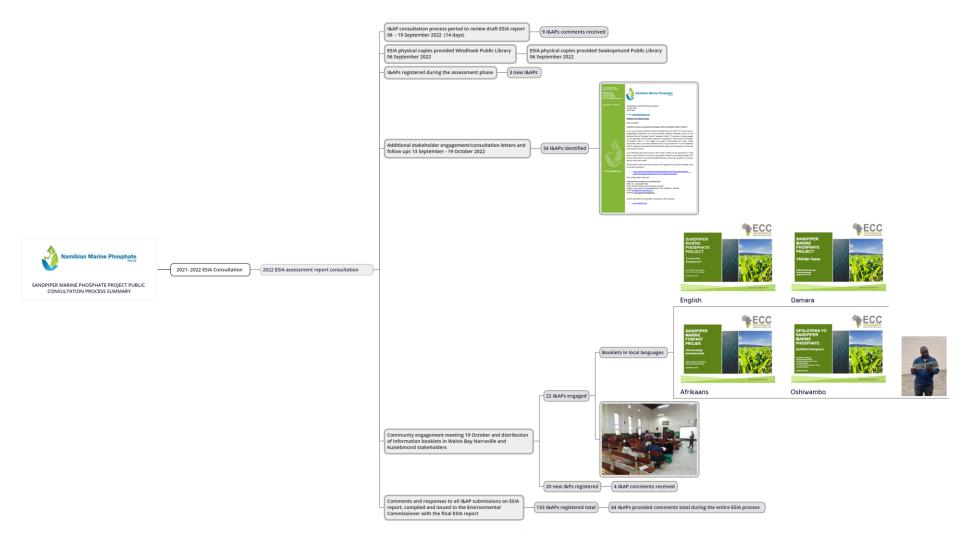


Figure 4 – Overview of the public consultation process 2022 (ESIA)



# 2 BACKGROUND AND PREVIOUS PUBLIC CONSULTATION AND ENGAGEMENT

### 2.1 BACKGROUND

The required formal public consultation process for the current application for an environmental clearance certificate for the Sandpiper Project, mining licence (ML) 170 commenced on 23 December 2021. Consultation for the proposed Sandpiper Project has been ongoing since ML 170 was awarded to NMP in July 2011 by MME through various prior assessment processes.

Though the course of these previous assessment, in the period from July 2011 to December 2021, there has been a sustained period of prior interaction between the Proponent, the public, stakeholders, and relevant government authorities in regard to the proposed Project, which has also been well ventilated in the Namibian press.

Considering the overall objective of the consultation process both within the provisions of EMA 2007 and the broader context, a number of these previous engagement activities that were undertaken are therefore of relevance to the current application in regard to informing the public and local communities about the Project and the ESIA process, addressing related concerns and issues, providing interested and affected parties access to and opportunity to comment on relevant reports and studies.

A summary of these activities is presented below. Additionally, schematics related to the information presented in the sections below regarding public participation comparisons between 2011 – 2021 and during the current 2022 ESIA process are presented in Figure 5 and Figure 6, respectively. Figure 5 provides an overview of I&AP participation during the 2022 EIA assessment, additional 2018 engagements and 2022 ESIA process. Submissions refer to comments received by I&APs and formally recorded. Figure 6 provides an overview of public participation, taking into consideration the job registration drive with potential job seekers in 2020 – 2021. It can therefore be concluded that the majority of participations are interested in the socio-economic benefits of the Project.



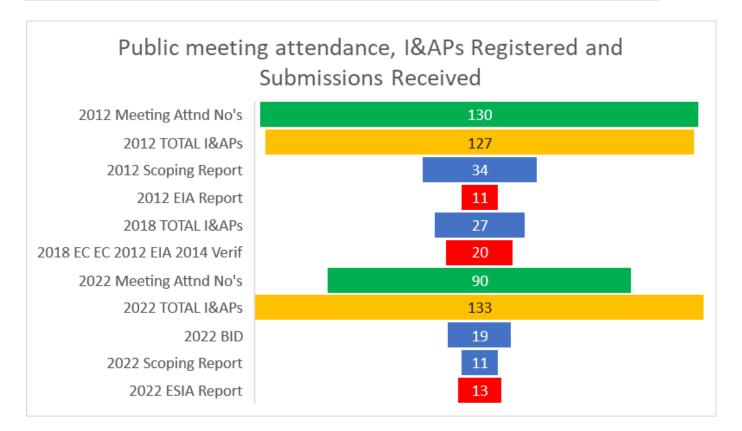


Figure 5 – Overview of I&AP participation in the Sandpiper Project from 2011 – 2022





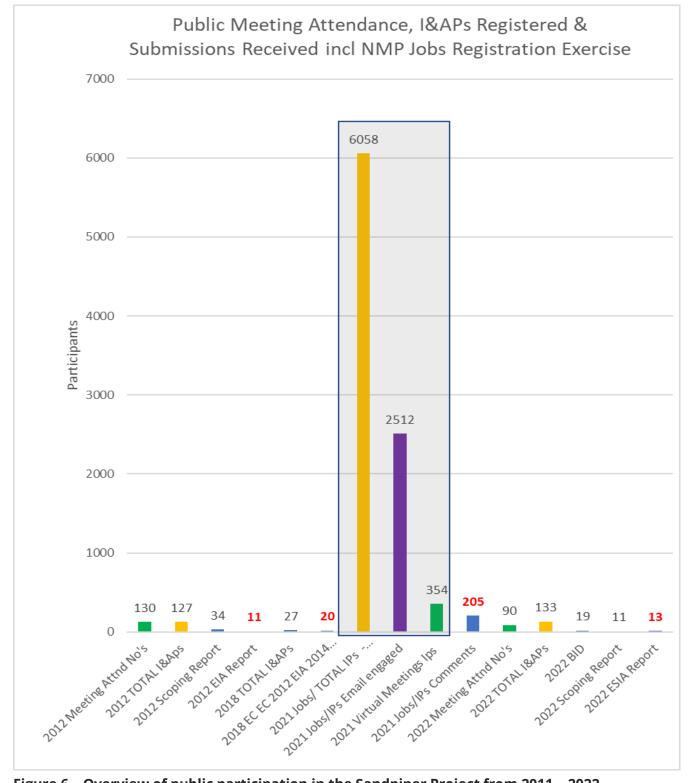


Figure 6 – Overview of public participation in the Sandpiper Project from 2011 – 2022



### 2.2 2011 – 2016 PUBLIC CONSULTATION

In 2011, a series of 8 public and focus group meetings were held in Walvis Bay and Windhoek, a total of 98 persons/organisations attended. A total of 127 persons/entities registered as Interested and Affected Parties.

Draft and final copies of the 2012 scoping report as well as the environmental impact assessment report were distributed to I&APs, stakeholders and made available to the public for review prior to finalisation. A total of 34 I&AP comments on the scoping report and a total of 11 comments on the EIA report were received and addressed.

In addition to the 8 meetings noted above, an additional 2 meetings chaired by the Governor of the Erongo Region included a public meeting on 3 July 2012 convened at his request, with 25 attendees from fishing industry, Ministry of Fisheries and Marine Resources and public entities including NGO's and a follow up meeting with 7 MFMR/NatMIRC Scientists on 10 September 2012.

In April 2016, representatives of NMP, the EIA specialist consultants, scientists from MFMR and representatives from MEFT held a further high level meeting to review and resolve the residual issues of concern following completion of the EIA 2014 verification study.

### 2.3 2018 PUBLIC CONSULTATION

In 21 June 2018, the Minister of MEFT ordered that the Environmental Commissioner should notify the Ministry of Fisheries and Marine Resources, the fishing industry and all other interested parties to finalise their input into the (2012 EIA and 2014 verification assessment) reports within three months from date of order. Subsequently, following advertisement in 3 local newspapers, a further 3 month period of public consultation was carried out in the period from 1 July to 30 September 2018 for submission of comments to the office of the Environmental Commissioner. All relevant reports were made available online and in hard copy by the MEFT. A total of 27 persons/entities registered to access documents. A total of 20 submissions were made.

## 2.4 2020/2021 COMMUNITY ENGAGEMENT - JOB REGISTRATION PROCESS

In the period from October 2020 to May 2021, while the Judgment on the legal proceedings initiated by CNFA and 3 other parties was pending, NMP conducted a job registration drive, open to all Namibians to register their interest to be considered for the various potential jobs and roles that are expected to be created based on the proposed development of the Sandpiper Project.



The objective of the exercise was to compile a database of prospective job seekers who would be suitable candidates for employment in the future for various full time, part-time and casual positions during the construction and operational phases of the Project. Details of the job registration process were advertised locally in newspapers, on social media and on the company's website.

NMP closed its job registration drive on 30 November 2020 with over 6000 registrants from across Namibia. The majority of registrants were between the age of 25 and 44 years.

A media statement was issued by NMP providing responses to questions raised during the job registration drive by NGOs and the public at large and providing details of the next steps in process.

NMP engaged with 2512 community member registrants via the Zoom workshops and emailed presentations, which were opened and downloaded by those who were unable to attend online

A series of 7 informative workshops were held online to provide registrants with details about the technical, environmental and development aspects of the Sandpiper Project, along with the related job opportunities.

All registrants were contacted directly by NMP by email or text and issued with information documents and invitations to attend the workshops which were then held in April and May 2021 as virtual meetings (Webinars) subject to prevailing Covid-19 restrictions.

During these workshops, NMP engaged with and answered questions from 354 community members via Zoom.

On completion of the workshops, all registrants were provided with follow-up communications and copies of the information provided during the Webinars. Periodic updates are being issued to all registrants as ongoing engagement.

The outcome of the exercise was to distribute knowledge of the Project to a wide spread of the job seeking community both within the local community areas of Walvis Bay as well as the whole of Namibia. Details age, gender, qualification, job interest category and residence location of the 2512 community members engaged is attached in Appendix M.



# 2.5 Chamber of Mines Namibia – Marine phosphate information campaign

During the period December 2020 to February 2021, the Chamber of Mines Namibia conducted a comprehensive public relations and information campaign to provide factual information on the issues surrounding marine phosphate in Namibia. The campaign was directed at the general public to address issues raised and ventilated primarily as a result of the application by NMP for environmental clearance for ML 170. The campaign provided an independent review and opinion on the perceived threats and misinformation surrounding the proposed development of marine phosphate mining in Namibia, as well as addressing the potential socioeconomic benefits that a phosphate based industry in Namibia may deliver.

### 2.6 ONGOING PUBLIC ENGAGEMENT – PROPONENT

Throughout the past (27) and current (3) processes, NMP has continued issue media statements at appropriate intervals to keep the public and stakeholders informed of the current status of affairs and to address misinformation as and where it has been circulated in the media.

Since 2018, NMP has held regular media conferences (12) to enable local press reporters to pose questions in relation to the Project and related environmental permitting activities being undertaken.

Media statements and reports have also been distributed at intervals by NMP on social media (258).

NMP has also engaged the public in other mediums, including radio, to hear and answer questions from the public in regard to the proposed Sandpiper Project (29 different engagements).

NMP's website provides up to date information on the company and the Sandpiper Project, including all media statements made by NMP, relevant documents and press reports.



# 3 CURRENT ESIA PROCESS: SUMMARY OF PUBLIC MEETINGS, KEY ISSUES AND COMMENTS FROM I&APS

### 3.1 INTRODUCTION

For the initial public and stakeholder engagement requirements for the 2022 assessment, in line with the EMA and associated Regulations, two public meetings were scheduled and conducted in Windhoek and Walvis Bay on the 09 and 11 February 2022 respectively, to ensure that the public and key stakeholders are engaged in the early stages of the ESIA.

For the public meetings, local and community union representatives, directly affected parties, as well as local, regional and national authorities were identified and issued invitations to attend. Notices advertising the public meetings were also published in local newspapers and media. All attendees at the public meetings were recorded and registered, as interested and affected parties (I&APs). A summary of the public meeting's feedback was issued to the relevant stakeholders, registered I&APs and competent authorities being the Ministry of Mine and Energy (MME), Ministry of Fisheries and Marine Resources (MFMR) and the Ministry of Environment, Forestry and Tourism (MEFT) to accompany the application for an environmental clearance certificate, for a record of decision (RoD) to be made.

### 3.2 PUBLIC MEETING SUMMARY

The public meetings were facilitated by Environmental Compliance Consultancy (ECC) with technical support from NMP. The welcoming and agenda of the meetings included an introduction to ECC as an independent environmental consulting company commissioned by the Proponent NMP as the environmental assessment practitioner (EAP) to conduct the environmental impact assessment and apply for an environmental clearance certificate for the proposed offshore marine phosphate mining activities on Mining Licence ML 170.

As part of the Project's introduction to the public, the Project's location, baseline and ESIA process, and procedures were presented. An explanation of the Project's current status including a summary of the previous environmental assessment processes completed and the outcome of legal actions was also provided as background leading into the current application process and public meetings held. It was emphasized that the objective of the current public scoping meeting conducted in the early scoping phase is to engage all stakeholders and to identify further potential studies and assessments that may be required for inclusion in the environmental impact assessment of the Project.



The technical presentation by NMP then provided an overview of the proposed operations on ML 170 for which the environmental clearance certificate is required, as well as the overall project including:

- NMP company structure and project milestones
- Phosphate and its useful applications
- Intended products, target markets and geopolitical advantage of Namibia
- Identified mineral resources and ore reserves of the Sandpiper Project
- Outline of the simple phosphate ore beneficiation process and final product
- Scale of proposed annual (<0.1 % of ML 170 area) and 20 year (<2 % of ML 170 dredging operations in ML 170
- ML 170 dredging equipment and process description
- Non-continuous dredging cycle (transit, dredging, transit, offloading) duration (14-16 hours actual dredge time per cycle) and frequency (approx. 3 cycles per week).
- Prospective general sites for a land-based processing plant and beneficiation operations.
- Project permitting stages for the marine operations on ML 170 as the requirement to proceed to permitting and development of the land-based component of the overall project

The presentation from ECC covered a detailed description of the public consultation purpose and intentions as part of the environmental and social impact assessment (ESIA) process for the marine operations in ML 170. At this stage, I&APs were encouraged and informed of the importance of raising any concerns and comments related to the proposed operations on ML 170, which are to be considered in the ESIA studies and submitted along with the application for an environmental clearance certificate to the competent authorities and MEFT for a record of decision.

The main components of the environmental assessment identified for consideration in the ESIA were discussed, such as, aspects and concerns raised about the impacts of seabed mining on the marine biodiversity and ecosystem functioning and how mitigation and monitoring measures will be enforced, which will form an important part of the impact study for the proposed Project. The current phase aims to involve and engage I&APs to develop target-specific Terms of References (TOR) for necessary specialist studies required to address all identified concerns and potential impacts in the assessment report.

### 3.3 Key feedback on issues of concern – Public meetings

The pool of comments received from all meetings held were provided by key stakeholders, representatives of the community and industry such as; the Confederation of Namibian Fishing Associations, Ocean Conservation Namibia. These groups of I&APs presented useful and valuable input into the ESIA through the points and comments raised during the various



meetings. From the review of the recorded statements, the key common themes of concern that were raised can be summarised in the following categories:

### 3.3.1 IMPACTS ON THE BIODIVERSITY OF THE AREA AND MARINE ENVIRONMENT

In open discussion, concerns were voiced in regard to:

- The effects of sediment plume dispersion and the effects it may have on marine life and the marine ecosystem,
- The effects of underwater noise from operations on mammals and
- The release of heavy metals through the generation of plumes and its influence on marine life.
- Regarding these concerns, the Proponent advised of recent supplementary studies completed in 2020 including: a specialist study conducted by UK based group HR Wallingford on ocean currents and sediment plume dispersion modelling to determine the potential footprint of the sediment plume for single, annual and 20 year cumulative dredging operations.
- Sediment toxicity study to supplement the existing studies of heavy metals, toxicity, elutriation, the potential of suspended and dissolved heavy metals in the water column and possible ingestion of particulates of sediments and their impacts on organisms in the benthos. It was also noted that previous work included modelling of potential ecosystem impacts and related assessments.

It was further noted that the operational process and seabed impacts of the proposed seabed phosphate mining activities, being effectively a dredging operation is not that much different from the large-scale seabed diamond mining which is also effectively a dredging operation that is already taking place in Namibia. Marine diamond mining operations have been taking place sustainably for over 30 years and have had no significant negative impacts on the environment reported to date. The proposed Sandpiper Marine Phosphate Project operations are by comparison of a significantly smaller scale.

3.3.2 HOW WILL NMP ENSURE THAT EFFECTIVE MONITORING TAKES PLACE AND MITIGATION MEASURES ARE ADEQUATELY IMPLEMENTED

Concerns were raised about how the Project operations and related impacts would be monitored and how the Proponent would ensure that appropriate mitigation measures were undertaken where possible to ensure that the negative impacts from their operations would be minimised.

There was a recommendation made from the floor that a multidisciplinary entity could be established to review the environmental performance of the company and its Project.

In this regard, it was noted that:



- The Namibian government has put in place comprehensive environmental legislation to ensure compliance in regard to monitoring and enforcement of committed mitigation measures and compliance with the legally binding environmental management plan (EMP) approved for the Project. The EMP is effectively what puts forth the level of monitoring the Proponent commits to on the operation and additional conditions included by the Environmental Commissioner should environmental clearance be granted.
- The Proponent is committed to operating within the best practice standards and principles of the industry and law.
  - 3.3.3 WHAT IS BEING DONE DIFFERENTLY THIS TIME COMPARED TO THE PREVIOUS EIA AND HOW WOULD ECC REMAIN INDEPENDENT WHEN CONDUCTING THE ESIA

Queries were raised relating to the understanding of the need for a new environmental impact assessment from the one already conducted in 2012 and 2014 and how the current EIA process would be conducted differently from that which was carried out previously. Will it be conducted without influence from the proponent?

**Response**: ECC noted that it retains its professional integrity, our client is the people and the environment. ECC always takes an unbiased approach and that is why public consultations with the government, private and public sectors are so vital, to capture what are the concerns so that we can assess them accurately. ECC also has no cut-off date for receiving public comments. MEFT then receives all comments and reviews our work.

ECC advised further that the significant body of specialist environmental information produced through the comprehensive set of assessments completed under the previous EIA process remains valid and will be utilised in this current assessment. However, the key difference this time will be to focus on the concerns of the general public and also to follow all of the correct procedures in gathering all comments to make sure that these are adequately captured in their scoping report so that the impact assessment is a true reflection of the process followed. In addition, the current ESIA will include additional information from new specialist studies that were done subsequent to the previous EIA.



# 4 SUMMARY OF FOCUS GROUP MEETINGS AND COMMENTS

## 4.1 INTRODUCTION

Prior to the announcement of the environmental clearance certificate application for the Sandpiper Marine Phosphate Project, in January 2022, key stakeholders including government agencies, NGO's, Associations, and companies were identified and issued with a courtesy letter from the EAP advising:

- a) The intended registration of the environmental clearance certificate application and public meetings for the Sandpiper Marine Phosphate Project
- b) That they had been identified as an interested and affected party and or stakeholder in relation to the proposed project and that the EAP would like to engage with them in relation to the proposed project
- c) To inform and invite their attendance to the public meetings and to engage with the EAP and the proponent to be further informed
- d) Advising of the intended dates for the public meetings in Walvis Bay and Windhoek and the importance of registering and participating as an I&AP
- e) A further set of advisory letters were sent to identified I&AP's and/or stakeholders in February 2022.

The full list of entities that were issued with letters both prior to and after the advertisement of the application is provided in (Appendix B).

Responses were received from some of the parties, which entailed requests to either register as an I&AP or in some cases requests for a focus group meeting.

## 4.2 MEETING WITH WALVIS BAY SALTWORKS

At their request and in response to the courtesy I&AP/Stakeholder letter that was issued, ECC arranged and held a meeting with the executive management team of Walvis Bay Saltworks to present details of the proposed operations in ML 170 for the Sandpiper Project and the ESIA and environmental clearance certificate application process. The meeting was held at the WBSW offices in Walvis Bay on the 04 February 2022.

The minutes of this meeting are provided in Table 1 and provide details of the key contents of the meeting discussion and concerns raised by WBSW for consideration in the ESIA process.

### 4.3 MEETING WITH MINISTRY OF FISHERIES AND MARINE RESOURCES

At their request and in response to the courtesy I&AP/Stakeholder letter that was issued, ECC arranged and held a meeting with representatives of the Ministry of Fisheries and Marine



Resources (MFMR) to present details of the proposed operations in ML 170 for the Sandpiper Project and the ESIA and environmental clearance certificate application process. The meeting was held at the MFMR offices in Swakopmund on 11 February 2022.

The minutes of this meeting is provided in Table 3 and provide details the key contents of the meeting discussion and concerns raised by MFMR for consideration in the ESIA process.



# 5 SUMMARY OF SCOPING PHASE AND ESIA PHASE I&AP PARTICIPATION, ADDITIONAL COMMUNITY ENGAGEMENT MEETING AND COMMENTS

## 5.1 INTRODUCTION

The scoping report was issued for I&AP review from the period 22 April to 06 May 2022 (14 days). This was done via email, hard copies delivered to the required component authority and line Ministries and hard copies placed at the Windhoek public library, Swakopmund public library and Walvis Bay town hall. Comments were received from 11 I&APs for consideration in the ESIA assessment. This reference document can be found as an appendix to the scoping report for further details on comments and respective responses issued by the EAP and Proponent.

The ESIA report was issued for I&AP review from the period 06 to 20 September 2022 (14 days). Comments were received from 9 I&APs for review. This was done via email, hard copies delivered to the required component authority and line Ministries and hard copies placed at the Windhoek public library and Swakopmund public library. This reference document can be found as an appendix (Appendix C) to the ESIA report for further details on comments and respective responses issued by the EAP, the Proponent and where required specialists involved in the studies for the 2022 ESIA assessment.

As part of additional engagement attempts with local stakeholders and companies during the ESIA process in order to conclude the public participation process, particularly within the Walvis Bay community, 34 I&APs were identified and letters issued requesting further engagement and participation in the process. Follow up phone calls and/or emails were conducted in an effort to secure additional engagement meetings. Further information on the attempts to secure additional meetings and noted feedback from stakeholders either responsive or not responsive to participate, can be referenced in Appendix H and Appendix J. This engagement ran from the 13 September to 19 October 2022. Only one identified I&AP requested to participate and assisted to arrange a community engagement meeting with Walvis Bay stakeholders on the 19 October 2022. Further details on this engagement is discussed in the section below.

Information booklets on what phosphate is and the mining process for the Sandpiper Project were developed in English, Afrikaans, Oshiwambo and Damara for distribution at the Walvis Bay community engagement meeting and to the local community. The booklets were distributed at the NMP offices in Walvis Bay on the 27 October 2022 and the main Walvis Bay municipality building (Civic centre) on the 28 October 2022. These booklets can be viewed in Appendix I. A



notice was put on the NMP Facebook page information the public of where these booklets can be located.

#### 5.2 MEETING WITH WALVIS BAY COMMUNITY STAKEHOLDERS IN KUISEBMOND

A meeting was held at the Evangelical Lutheran Church in Kuisebmond in order to further engagement with community stakeholders in Walvis Bay to gauge their interest and any concerns raised in order to conclude the ESIA public participation process for the Project. Information booklets were distributed and made available at this meeting, the presentation included going through the content of this booklet to the attendees. 22 I&APs attended the meeting, whereby 2 were previously registered as I&APs. 4 I&APs raised questions during the meeting, which were mostly pertaining to the following topics;

- a) When will the project start up, what are the next steps and when will jobs be advertised;
- b) Life of mine of the project;
- c) Total jobs for the marine and land based operations;
- d) Location of the planned-on land facilities;
- e) Land based component queries on the process, preventing pollution and tailings storage facility;
- f) When will the land-based assessment be conducted:
- g) Where is the exact location of ML 170;
- h) Impacts on marine mammals, particularly seals;
- i) Will the phosphate be sold within Namibia or only exported;
- i) EAP competence guery in the process; and
- k) How will jobs be advertised.

The minutes of this meeting are provided in Table X and provide details of the key contents of the meeting discussion and concerns raised by Walvis Bay community members for consideration in the ESIA process.



# 6 ACKNOWLEDGMENTS

In closing of all meetings ECC thanked all I&APs for their attendance and for providing valuable feedback during the public and stakeholder meetings. Through the public meeting process the Proponent and ECC have endeavoured to provide a platform to hear and address all relevant comments put forward by I&APs.

ECC further endorsed the fact that constructive feedback from I&APs results in a more robust and improved ESIA. This process results in a project that is understood by the community and I&APs.

6.1 DETAILED COMMENTS AND RESPONSES FROM PUBLIC CONSULTATION MEETINGS

The official public consultation period began on the 23 December 2021 and remained open until the 25 February 2022 for initial comments. In summary, 106 I&APs registered during the initial BID and pre-consultation stage and 19 comments were received by I&APs and responded too. During the scoping stage, 4 new I&APs registered and 11 comments were received by I&APs and responded too. During the ESIA stage, 23 new I&APs registered and 14 comments were received by I&APs and responded too. These were received during focus group meetings, public meetings, stakeholder engagement meetings, via email and telephone which were included in the tables below. The public consultation period officially concluded on the 19 October 2022.

The public participation is now completed and the final ESIA reports and appendices will be submitted to MEFT for a record of decision. Going forward, I&APs and the public will be able to provide additional comments to the office of the Environmental Commissioner, once he has advertised to do so and for the period of advertisement.



Stakeholder engagement with Walvis Bay Saltworks Holdings				
	Friday 4 <sup>th</sup> February 2022			
	Zoom Meeting			
Stakeholder Name and details	Comments/Questions Received	Response/Clarification		
Klaus Friedlingsdorf WBSH	1. Is the dispersion model concluding that there is no risk of any suspended solids reaching the intake of our saltworks?	• The risks associated with sediment plume dispersion and potential toxicity impacts related to heavy metals will be fully assessed in the current ESIA process.		
	2. Is there any risk of heavy metals reaching the intake of our seawater?	• The specialist studies in those particular areas of concern have been completed most recently in 2020 and previously		
	3. Will there be any bioaccumulation of heavy metals in the form of plankton that floats down to our intake because our oysters feed on plankton so it	in the 2012 and 2014 detailed EIA verification documents and external peer reviews which address those concerns, particularly pertaining to;		
	will end up in the oysters and the brine?	i) Bioavailability of heavy metals		
	4. If there is any showstopper hindering NMP from	ii) Bioaccumulation of heavy metals		
	setting up their land-based operations in and around the bulk terminal and the disposal near the airport, would you still consider your initial land	iii) Sediment Plume Dispersion and cumulative zone of influence over 20 year mine life		
	iv) Detailed sediment plume dispersion modelling includes site information on ocean currents, turbidity and sediment composition that wasn't included in modelling done in 2012 and 2014.			
		<ul> <li>WBSW intake was identified as a key receptor for these studies and results will be assessed as part of the current update of the impact assessment.</li> </ul>		

### Table 1 - Comments and feedback from pre-consultation engagement with Walvis Bay Salt Holdings



	Stakeholder engagement with Walvis Bay Saltworks Holdings <b>Friday 4<sup>th</sup> February 2022</b> Zoom Meeting		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
		vi) Expert opinion and most recent studies indicate no risk of exposure in regard to water quality or mariculture operations in relation at the site of Walvis Bay Saltworks.	
		No, it is not a viable option or requirement for NMP to consider placing any land-based operations at the original identified site south of the Walvis Bay Saltworks Mining Licence boundary	
Andre Snyman	There was a time when our oyster operations were not operational and stopped and I would just like to	Comments above refer.	
WBSH	double-check that the potential impact on our oyster operation was fully considered and understood because the oysters have become an important component of our system in terms of a biological filter and that is something we need to confirm that at the time of study that our oysters were operational and the impact on the oysters was taken into consideration.		



### Table 2 - Comments and feedback from the Windhoek public meeting

Wednesday 9 <sup>th</sup> February 2022, 18h30			
	Address: 110 Robert Mugabe Avenue, Windhoek		
		Scientific Society	
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
Governance			
Frank Steffen	1. After previous altercations/disagreements have you met with any of the other	1. There has been an ongoing process through a public and stakeholder consultation process, which has been ongoing since 2011. To date, there have been roughly 18 consultations with various stakeholders and the public	
Editor of Allgemeine Zeitung	marine users, what are the	including the fishing industry, Ministries and public stakeholder working groups	
	developments? Do they agree with what you do now?	leading up to this phase.	
		More recently, the government started developing the draft marine spatial plan and since 2018 NMP has been engaging stakeholders in the development of a central marine spatial plan, which is effectively a mechanism by which the government can manage all the activities in the marine environment including: fishing, mining, defence, tourism etc.	
		This will allow them to identify where there are potential overlap zones, allocate where there are specific areas of priority for specific activities and set down ground rules to minimise and eliminate conflict between industries. The draft Marine spatial plan has been put out for stakeholder comments and the process is being managed by MFMR and is running in parallel with the drafting of the Blue Economy Policy which is the is intended to drive the future	



Wednesday 9 <sup>th</sup> February 2022, 18h30			
	Address: 110 Robert Mugabe Avenue, Windhoek		
		Scientific Society	
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details	<ol> <li>One of the biggest concerns of the public is mitigation. The public does not seem to have much trust in mitigation being governed by our government or the power that be. What are you committing to on your own, what will you do to make sure there is minimal impact?</li> </ol>	<ul> <li>development of Namibia's blue economy.</li> <li>2. The government of Namibia has put in place good environmental management legislation, which is acknowledged as being one of the best environmental legislations currently in place internationally. This legislation has operated quite effectively in mitigation and governance of the marine diamond mining industry enabling it to operate quite effectively, without any reported impacts on the marine environment.</li> <li>The operation proposed by NMP is a standard dredging operation that has been managed and monitored already on many occasions through government agencies reporting to MEFT for developments such as Namport harbour expansion. As far as monitoring and mitigation the Namibian government has put in place adequate and proper legislation. In relation to the proposed project, the environmental monitoring, mitigation and management actions are captured in the environmental management plan (EMP) which must be approved by the Environmental Commissioner.</li> </ul>	



Wednesday 9 <sup>th</sup> February 2022, 18h30			
	Address: 110 Robert Mugabe Avenue, Windhoek		
	Scientific Society		
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
		Where there are any breaches in the defined activities of the EMP, it permits the government to implement its powers to either suspend or terminate operations. Every three years the law requires that the clearance certificate has to be renewed, and can only be renewed if the proponent has complied with the provisions of their EMP.	
		3. Because marine phosphate mining is often presented as something that has "never been done before" there is a bit of clouding of the facts as the proposed operation is fundamentally a dredging operation which is an operation that has been done in many places in the world.	
		The project proposes using a standard dredger and a standard trailing arm dredging technique.	
	<ol> <li>How does this peer assessment work considering there has never been phosphate mining done offshore before?</li> </ol>	Therefore, when it comes to peer review, we look at what marine operations are peer-reviewing the impacts of dredging, dredge spill and the environmental removal of sediment. Many studies and assessments have been done in the North Sea where aggregate mining, beach reclamation, and land protection dredging, which is also the trawling grounds for the North Sea. So, there is a	



Wednesday 9 <sup>th</sup> February 2022, 18h30			
	Address: 110 Robert Mugabe Avenue, Windhoek		
	Scientific Society		
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
		wealth of information and experience on the impacts and environmental	
		management of seabed dredging operations.	
		When it comes to the land-based operations the peer review will happen as part of the EIA process and will be based on the activities and what the impacts	
		will be on the immediate surroundings.	
Gabriel Erastus	How can we trust ECC as the	Professional integrity, the client is the people and the environment. Unbiased	
	independent consultants since you are	and that is why we do public consultations, to capture what are the concerns so	
Economist	contracted by the client? Do you have	that we can assess them accurately. MEFT receives all comments, and we have	
	someone from the MEFT as part of this	a consultation with the Ministries and capture their concerns and they review	
	assessment as symmetry, to make sure	our work.	
	that the negative impacts are also fairly		
	reported?		
•	Operational Processes		
Frank Steffen	1. If we look at the waste of the	1. Approximately 60-70% component of everything that is recovered from the	
Editor of the Allgemeine	project, what is the ratio of waste	seabed is turned into a product, A fraction of the fine material is removed	
Zeitung	compared to what will be taken out	during the initial dredging process and the remainder is removed in the	
	and used (what is used and what is	onshore screening process. The sand fraction is retained and is comprised of	
	disposed of)?	grains or pellets of phosphorite.	
	1		



	Wednesda	y 9 <sup>th</sup> February 2022, 18h30			
Address: 110 Robert Mugabe Avenue, Windhoek					
Scientific Society					
Name and	<b>Comments/Questions Received</b>	Response/Clarification			
stakeholder details					
	<ol> <li>How many cycles per week, month or year would you have when you produce?</li> </ol>	2. There will be 2.85 (approx. 3) full dredge cycles a week. The dredging operations on site takes approximately 14-16 hours to fill the hopper. Dredging on site in ML170 is not a continuous operation and as such is not a high-intensity operation in terms of total time on site in any given week or year.			
David Jarrett RDJ Consulting Services	<ol> <li>Quantity that is stripped from the seabed per week; is that rate higher or lower than NamDeb per week?</li> </ol>	<ol> <li>The annual target is set for 5.5 million tons dredged from less than 2.5 square kilometres which is much less than NamDeb's marine diamond mining operational footprint, which is estimated to be about 15 square km per year and the bottom trawling activities that impact an area estimated at 18000km of seabed.</li> </ol>			
	<ol> <li>What happens to the waste, will it be used in building construction or will the rest of it be taken back to sea and dropped off?</li> </ol>	<ol> <li>The coarse fraction waste comprises mostly shell material that can potentially be used to produce by-products used in the construction industry. If not used, it will be stored in a tailings facility.</li> </ol>			
Gabriel Erastus	Is the waste being released, harmful?	There are no toxic chemicals used in the beneficiation process and the process water is transported to a tailings facility and disposed of in the form of slurry.			
Economist					
Potential effects of pho	osphate mining of marine biodiversity	,			
Dr Nichola Knox	There is only a small area in ML170	The mining licence area was applied for because it covered the extent of the			



Wednesday 9 <sup>th</sup> February 2022, 18h30					
	Address: 110 Robert Mugabe Avenue, Windhoek				
Scientific Society					
Name and	<b>Comments/Questions Received</b>	Response/Clarification			
stakeholder details					
	that you are going to mine, and it	resource that was explored and identified. Therefore, from a company			
NUST	won't be lower than 200m and	perspective, it is necessary to protect the investment and value of the defined			
	doesn't incorporate the area of where	resources and reserves that fall within the mining licence area. Currently there			
	hake and monkfish inhabit, have you	is no cause or reason to reconsider the area as no activities are currently			
	considered reducing your area, to the	planned in the deeper parts of the Mining Licence area.			
	area where you are mining and				
	appease fisheries.				
David Russel	As far as mining goes it is very close	The impacts of sediment plume dispersion will be fully assessed as part of the			
	to the 200m depth restriction, in the	current ESIA process.			
Confederation of the	actual SP1 area a third of it is inside.	While SP1 overlaps, the actual 20-year mine plan area doesn't lie shallower			
Fishing Association	My concern is with regards to the	than the 200m depth regardless of what the indications are on the boundaries			
	plume, that some of that may be	of the SP1 block. The 20-year mine plan area itself is located in water deeper			
	swept into the breeding grounds of	than 200m. The recent detailed modelling of the sediment plume dispersion			
	the fish and how is that being	from the proposed dredging operations has been defined and shows that the			
	conserved?	cumulative footprint of the plume over 20 years lies predominantly within			
		ML170 and more importantly the extent of the single dredge plume on its own			
		is significantly smaller and does not extend beyond the ML boundary and			
		disperses over time during the intervals between dredge cycles.			
		While the modelling of where the dredging sediment plume has been defined,			



	Wednesday 9 <sup>th</sup> February 2022, 18h30				
Address: 110 Robert Mugabe Avenue, Windhoek					
	Scientific Society				
Name and	Comments/Questions Received	Response/Clarification			
stakeholder details					
		the proponent is nevertheless unable to include the other potential impacts of			
		sediment plume generation and dispersion into the breeding grounds of fish			
		that could be derived from other significant activities such as bottom trawling			
		operations that are conducted in the vicinity of the Mining Licence and 200m			
		depth contour. We should note this this down somewhere and discuss it as a			
		cumulative impact in the ESIA report and also list it as a limitation in the very			
		beginning of the same report.			
Berden U	Some countries have phosphate	There isn't a specific ban on phosphate mining but there has been a ban in the			
	deposits offshore and still don't allow	form of a moratorium or prohibition on seabed mining generally in certain			
Earth science	the mining of it. If mining has never	parts of the world. Certain individual states in the US and Australia don't see a			
	been done anywhere in the world	need for seabed mining and have prohibited it as they have enough land-based			
	before, impacts may be much worse	deposits. As far as being a guinea pig goes, Namibia already runs the first and			
	than anticipated, how do we know	largest seabed diamond mining operation in the world with five vessels in the			
	the impacts and how to deal with	ocean, mining. The potential impacts of the proposed dredging operations in			
	those impacts.	ML170 will be fully assessed as part of the current ESIA process.			
		The impacts and management of seabed dredging operations are well			
		documented and understood at an international industry level. The proposed			
		marine phosphate mining is essentially a standard dredging operation for			
		recovery of sand, which in this case contains phosphate. A similar dredging			



Wednesday 9 <sup>th</sup> February 2022, 18h30				
Address: 110 Robert Mugabe Avenue, Windhoek Scientific Society				
stakeholder details				
		operation in UAE for example would not be considered as a world first		
		operation and would just be seen as a land reclamation project, because		
		dredged sand would be used to build an island. Dredging of seabed sediments		
		for recovery of minerals is not new in Namibia as it is already being done in in		
		the form of seabed diamond mining.		
Waldie	Underwater noise, dolphins and	The Proponent has considered the concerns of the public and has		
	whales are sensitive to noise, has this	commissioned several specialist studies to address those concerns. This		
Scientific Society	been taken into consideration?	particular concern has been considered in 2012, 2014 and a further noise		
		propagation study was done in 2020.		
		The results of these studies will be utilised in the current impact assessment to		
		address these concerns.		
David Russell	Heavy metals in SP1 will be released	The potential risks associated with heavy metals and sediment plume		
	by the plume and the fishing level will	dispersion will be fully assessed in the current ESIA process.		
Confederation of the	be closed if the heavy metals in fish			
Fishing Association	get too high.	Heavy metals occur in the seabed sediments on the seafloor throughout the		
		Namibian coast and not just in SP1. Relevant toxicity studies and elutriation		
		studies have been done as well as studies on the potential of suspended and		
		dissolved heavy metals in the water column and the ingestion of particulates of		
		sediments and impacts of organisms in the benthos. Ecosystem impact		
		assessments have also been done.		



	Wednesda	y 9 <sup>th</sup> February 2022, 18h30
Address: 110 Robert Mugabe Avenue, Windhoek		
		Scientific Society
Name and	<b>Comments/Questions Received</b>	Response/Clarification
stakeholder details		
		Assessment of the potential risk related to these aspects will be assessed as part of the current ESIA process.
Dr Roy Muller	Cumulative Effect of bottom trawlers	The observation is well noted as is the further comment that one would like to
	on benthic fauna	see an impact assessment on benthic trawlers so that seabed mining doesn't
Windhoek Resident		get blamed for environmental impacts that are not caused by mining.
Mitigation measures a	nd monitoring	
David Jarrett	1. How is NMP going to assist its	Consideration will be given to the recommendation for independent peer
	enforcement in ensuring the	review and by a multidisciplinary board to be appointed to review the
RDJ Consulting Services	mitigation of negative impacts and	environmental performance of the company and their project and to report
Gabriel Erastus	monitoring?	their findings and recommendations independently.
Economist	2. What is the company doing to ensure mitigation and compliance actions are carried out?	
Jessica Bezuidenhout	Wasn't there a suggestion for an	Dr Chris Brown's answer as CEO of NCE: As part of the enforcement and
	independent panel to monitor	building public confidence in the project we thought it would be best to have
Environmental	activities during the previous EIA?	an independent monitoring team under an independent government or
Compliance	(Question posed to Dr Chris Brown)	committee established.
Consultancy (ECC)		



Wednesday 9 <sup>th</sup> February 2022, 18h30			
	Address: 110 Robert Mugabe Avenue, Windhoek		
		Scientific Society	
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
		This would comprise of government agencies, the private sector, mining sector,	
		fishing sector, NGOs, etc to oversee it. The private monitoring group would	
		report to the previously mentioned body and would publish results on a	
		website, so that results would be available in real-time. In the diamond mining	
		programs, they have the same system based out of Cape Town that has been	
		monitoring their activities for the past 12 -15 years.	
		Therefore, monitoring is conducted by independent scientists and the results are published in an annual report are peer-reviewed by internationally recognised marine scientists and thus have been able to look at the impact of dredging over the years and can compare areas of the seabed where dredging has taken place and where no dredging has taken place. What has been found so far is that in open areas where the sea can reform the sediments and be colonized by the benthic organisms coming back can take place, it typically takes 6-8 years for the seabed to recover to the point where you can't tell the difference between areas that have been mined and haven't been mined.	
		In rocky more secluded areas for the seabed to recover it takes a bit long 10-12 years. This dredging is the most sustainable mining operation you can get. The sea reforms itself whereas on land it leaves big holes.	



Wednesday 9 <sup>th</sup> February 2022, 18h30			
Address: 110 Robert Mugabe Avenue, Windhoek			
	:	Scientific Society	
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
Socio-economic			
Gabriel Erastus	Profit is only spilt between	Economic and social benefits of the project and related impacts will be	
	shareholders, but the people share	assessed as part of the ESIA process.	
Economist	the cost of any environmental		
	damage incurred.		
Dr Roy Muller	Comment: Benefits of mining to	Economic and social benefits of the project and related impacts will be	
Windhoek Resident	Fiscus	assessed as part of the ESIA process. Taxes, royalties and employee's PAYE	
		contributes to the economy and FISCUS earns over and above company profits.	
ESIA Process			
David Russel	How long do people have to register	ECC will allow you to register throughout the whole EIA process and will take in	
	as an I&AP?	comments as much as we can within the time restrictions given to us within the	
Confederation of the		regulations.	
Fishing Association			
Chello	Why are we going through this	1. 2012 Detailed feasibility study (DFS) completed Marine ML 170 EIA and ECC	
	process again?	application submitted	
Advocate for a better		2. 2013 ML 170 additional stakeholder consultation completed	
Africa		3. 2013 EIA verification studies commenced	
		4. 2014 18-month moratorium announced by MFMR	
		5. 2015. EIA verification studies completed	



Wednesday 9 <sup>th</sup> February 2022, 18h30			
	Address: 110 Robert Mugabe Avenue, Windhoek		
		Scientific Society	
Name and	Comments/Questions Received Response/Clarification		
stakeholder details			
		6. 2016. 18-month moratorium concluded	
		7. 2017. Environmental clearance certificate awarded to NMP for ML 170 Marine	
		Phosphate Mining	
		8. 2018. Appeal & legal action initiated; project suspended at this time	
		9. 2019. Public consultation recommenced by order MEFT	
		10. 2020. Supplementary environmental studies completed	
		11. 2021. Legal action completed, and high court judgment issued to: Confirm ML validity to reapply for ECC	



Namibian Marine Phosphate (Pty) Ltd

### Table 3 - Comments and feedback from NatMIRC focus meeting engagement

Stakeholder engagement with the Ministry of Fisheries and Marine Resources Friday 11 <sup>th</sup> February 2022 Address: NatMIRC			
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
NatMIRC attendees	1. Is the environmental clearance certificate application only for SP-01 of ML 170?	<ol> <li>Award of an environmental clearance certificate is a requirement that relates to the Mining License, not as a whole.</li> </ol>	
Ministry of Fisheries and Marine	2. Regarding the BID, will we have access to the socio- economic report?	2. Yes, access will be given.	
Resources	3. Will the uranium concentrations of U238 be included in the assessment?	3. Yes.	
	4. Was the model of the currents developed within only one season?	4. The model of currents produced by UK based specialist group HR Wallinford comprises comprehensive observations and predictions based on all seasons and the model outputs have been verified with in-situ current measurements on ML170 collected over a 3- month continuous period during the 2014 verification study.	
	5. During which months were the biodiversity studies conducted and did they coincide with the recruitment and spawning months?	5. This information is available in the 2014 EIA verification study for further review by MFMR.	
	6. There is a concern about spawning areas, removal of	6. These aspects have been considered in the 2012 and 2014 EIA	



	Stakeholder engagement with the Ministry of Fisheries and Marine Resources Friday 11 <sup>th</sup> February 2022 Address: NatMIRC			
Stakeholder Name and details	Comments/Questions Received	Response/Clarification		
	substrate for monkfish and emphasis needs to be put on spawning activities. Also, a lot of effort has gone into hake and monkfish studies but has NMP looked at other species?	verification studies specifically (which have been previously reviewed by MFMR) and will also be assessed as part of the current ESIA process.		
	7. Will monkfish be sucked up?	<ol> <li>There is a possibility, however the dredger is slow moving (approx. 1 knot) which enables opportunity for fish to move out of the way. The data available show monkfish catch was low in that area; therefore, it is possible but not likely to be significant risk.</li> </ol>		
	<ol> <li>Following the spawning issues, on a CSIRO visit to Australia, concerns about seabed mining came up and activity that coincides with spawning will not be allowed</li> </ol>	8. We are not sure of any regulations in Western Australia regarding this. Each case will be unique and good scientific data would be required to substantiate any such proposal.		



# Table 4 - Comments and feedback from Walvis Bay public meeting

Friday 11 <sup>th</sup> February 2022, 16h00			
	Address: Walvis Bay, Town Hall		
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
<b>Operational Processes</b>			
Walter Hansen	How is Sandpiper going to mine	The proposed mining operations for the Sandpiper Project are based on the	
	differently to reduce toxic effects?	use of standard seabed dredging using a trailing suction dredge arm.	
Ocean Conservation			
Namibia		The toxicity effects of dredging are related to the composition of the seabed	
		sediments and related biogeochemical impacts of the sediments. These	
		parameters have been thoroughly assessed in previous specialist studies and	
		the potential risks will be re-assessed in the current ESIA process.	
Bronwen Currie	Elaboration on the dredging process	Impacts related to the potential risk of heavy metals, including uranium,	
	and cycles. Mining will go up to 6	sediment plume dispersion, toxicity, bioaccumulation and cumulative effects	
Walvis Bay resident	meters depth. Mud and sediment will	have been assessed in specialist studies completed it the 2014 EIA Verification	
	be stirred up. These sediments are very	study and further studies have been since completed in 2020. The results of	
	high in heavy metals and uranium.	previous and recent studies will be utilised to assess the potential risks as part	
	Marine life is non-selective and will take	of the current ESIA process.	
	up these particles, consistent plumes in		
	the water column will lead to	The phosphate deposit does extend down to six meters in places on the	
	bioaccumulation. Fish are extremely	western side of the mining licence (ML170) however, the deposits in the	
	valuable to our economy, consumers and jobs and the ecosystem	defined 20-year mine plan area go up to depth of 2.5m below seabed. So,	
	and jobs and the ecosystem functioning. The effects of this process	mining will not remove up to 6 m of the seabed.	
	Tunctioning. The effects of this process		



	Friday 11 <sup>th</sup> February 2022, 16h00		
Address: Walvis Bay, Town Hall		s: Walvis Bay, Town Hall	
Name and	<b>Comments/Questions Received</b>	Response/Clarification	
stakeholder details			
	may only show up in the food chain many years later.	The annual cycle of the dredging is not continuous and comprises footprint of less than 2.5km2 per year (actual average area of 1.7 km2 per year over 20 years). The footprint is small compared to other seabed mining operations which dispose of sediments continuously over the side of their vessel. The marine diamond mining fleet now has five production vessels mining the ocean seabed, which are working 24/7 continuously and pump 90% of their material overboard into the water column. By comparison the proposed operation in ML170 will only have one vessel working 2.85 cycles a week. It will not be a continuous dredging operation and the material being pumped back overboard is significantly less. Heavy metals and uranium are not only found in the SP1 area in ML170. They occur widely in sediments at various locations on the Namibian continental shelf. Heavy metals have tendency to accumulate predominately in the mud belt, which is not in the ML170 mining area, it is further to the east Phosphate distribution map also shows that, phosphate is distributed in various concentrations in most sediments on the inner and middle shelf as well.	



	Friday 1 <sup>°</sup>	1 <sup>th</sup> February 2022, 16h00
Address: Walvis Bay, Town Hall		
Name and	and Comments/Questions Received Response/Clarification	
stakeholder details		
		UK based specialist group HR Wallingford was appointed to do the very detailed modelling of ocean currents and sediment plume dispersion, which
		they also did for the proposed marine phosphate projects in Mexico and New Zealand. The concerns as noted have been taken into consideration and
		specialists in their field have looked at these concerns including potential impacts on the ecosystem., as well as on the benthic organisms.
Malcolm Hoabeb	Implications of what is going to happen to the environment in the region, may	Impacts related to the potential risk of heavy metals, including uranium, sediment plume dispersion, toxicity, bioaccumulation and cumulative effects
UHC	lead to bioaccumulation of toxins in the food chain, what is going to be done to mitigate these risks?	have been assessed in specialist studies completed it the 2014 EIA Verification study and further studies have been since completed in 2020. The results of previous and recent studies will be utilised to assess the potential risks as part of the current ESIA process.
Mitigation and Monite	oring	
Maria Manuela	With the complexity of the project and the government may not be able to	Consideration will be given to the recommendation for independent peer review and by a multidisciplinary board to be appointed to review the environmental
Walvis Bay resident	adequately monitor the mitigation actions of NMP's EMP, how will the Proponent assist the government in monitoring the impacts of the project?	performance of the company and their project and to report their findings and recommendations independently.
Nadiadre Dreyer	Due to the limitations of the government, would there be a ship	NMP is keen to see the Namibian capacity improved to handle broad base participation in the management and monitoring of all marine operations.



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allocated to this project to continue the		
monitoring, would NMP be willing to	As far as this project goes, NMP has taken on its own set of responsibilities to do	
provide the boat or assist with the	monitoring for the program as we did for the baseline surveys, mitigation surveys	
acquisition of the boat for consistent	and frequency of monitoring will all be funded by contractors to gather information	
monitoring?	in accordance with the EMP and will be submitted by the Ministry of Environment.	
Comment: As a union leader I want to	Comment noted.	
see employment.		
Comment: Everyone in the fishing	Comment noted.	
industry keeps saying this has not		
been done before anywhere but we		
can't say because it hasn't been done		
anywhere else in the world that it		
can't be done. So many countries		
started with projects and others		
followed and this can be a similar		
case with Namibia. Walvis Bay is a		
	Address Comments/Questions Received allocated to this project to continue the monitoring, would NMP be willing to provide the boat or assist with the acquisition of the boat for consistent monitoring? Comment: As a union leader I want to see employment. Comment: Everyone in the fishing industry keeps saying this has not been done before anywhere but we can't say because it hasn't been done anywhere else in the world that it can't be done. So many countries started with projects and others	



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	project that can help the country and		
	can help alleviate the unemployment		
	crisis. We can see that the fishing		
	sector alone can't sustain the job		
	demand in the country. So, I		
	wholeheartedly welcome this project.		
	If the project follows all regulations,		
	then I don't see anything wrong with		
	going ahead with the project. If		
	anything goes wrong, they will be		
	taken to task. The project can coexist		
	with other sectors as it has been		
	proven with the diamond mining		
	industry and the fishing industry that		
	has been coexisting.		
ESIA Process			
Nangula	1. There was a previous EIA study for phosphate mining, what are the key	1. The previous EIA process was followed in several stages. The initial EIA was completed at the point where the government was changing its regulation	
Municipality of Walvis	lessons that you have learned from	from the environmental aspect being managed by the Ministry of Mines to	
Вау	the previous study.	being handled by the Ministry of Environment and the implementation of the new legislation.	



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		What we learned in that process was the value of public consultation is and how it should be carried out.	
		Our lesson has been to listen and always act where we believe it is reasonable, has been justified and is worth the investment to make sure that A. the project is run properly, and B. that the legitimate concerns that are raised are properly addressed.	
	<ol> <li>If no new specialist's studies will be done, what are you as an independent EAP going to do differently.</li> </ol>	2. New studies have been completed in 2020 and are included in this ESIA process. Further than that, at this stage, not yet, unless something comes up from the screening and scoping phase, but we will listen to the public and follow the correct procedure and take all comments and concerns on board and make sure that our scoping report adequately captures that and that the impact assessment is a true reflection of the process followed.	
		However, we will be using information from specialist studies that were done both during and after the previous EIA.	
Rodney Braby	Compare notes from the EIA process in	New Zealand deposit is different in character and setting than that in Namibia.	
	New Zealand, why was that application	The deposit sits at 400m, it is formed as a concretionary deposit, which means	
GIZ	rejected yet this project should go ahead?	it forms a series of lumps of phosphate that occur inside muddy sediment and	



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	that muddy sediment is overlying a rocky platform that has fish in some and has been declared a reserve. The concentration of those nodules is that they must excavate about ten times more seabed than we would l do to get an economically viable concentrate of phosphate out. In Namil deposit is 200-220m deep, it is in a featureless sediment area where th no structures, cold water columns or sensitive habitats.			
		A sample of the seabed extends for large parts of the shelf in that area and that is why New Zealand got a different result on their assessment. Cannot draw a parallel between New Zealand and Namibia as the characteristics of the deposits are different.		
Unknown	Engage the public on the impact and implications of the project.	The due process of the environmental impact assessment process requires the engagement of the public to have opportunity to register their comments on		
Walvis Bay Resident		the impact and implications of any new project requiring a full environmental assessment.		
Land based activities a	and impacts			
Nangula	Why does there need to be two separate EIA for the marine phase and land-based phase of the project? If the marine-based ECC is granted will the land-based ECC automatically	The law requires that an environmental clearance certificate be issued for a mining license in order to authorize any operations in the mining licence area. The mining license ML170 is in the ocean 160 km southwest of Walvis Bay. A separate environmental clearance certificate is required for the sites allocated for the land-based activities which will include the processing plant.		



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	be granted? Is this EIA dependent or			
	independent from the previous EIA?	There can be no investment in progressing the land component of the Project if		
		there is no valid authorisation to conduct operations in the mining license		
		where the vessel and mineral deposits are located. Therefore, it is a		
		requirement to have two separate EIA processes		
General				
Daniel	<ol> <li>Should anything go wrong is NMP there to take responsibility.</li> </ol>	1. NMP is committed to operating within industry-accepted best practices and principles as well as Namibian law. Within its obligations of the licence it		
Labour Union		receives, the certificate is only issued for three years. The EMP stipulates monitoring to be undertaken during that time, and the results should be put		
		forward and assessed independently by the Ministry of Environment, Forestry and Tourism.		
		If there is any activity that shows that there is damage created beyond the levels of acceptability, then the power of the Ministry is to immediately terminate those operations in the event of any catastrophe. Some insurances must be taken out by all of NMP's operating companies to ensure that funds are available to cover and close out those obligations.		
		There are therefore two levels of comfort that NMP stands by and maintains responsibility for its operations, mitigation measures and monitoring measures. We will make sure that NMP operates within the confines of the law		



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		and EMP which is legally binding. The Project is being monitored and will continue to be monitored closely.
		2. Comment Noted.
	2. Question posed to the fishing industry: different species of fish have disappeared even without the presence of phosphate mining, what makes you so adamant that phosphate mining will have a negative impact on fish populations?	
Malcolm	Can we get information that is easier for the average person to	Information will be provided, and scientific information will be communicated as best possible and in a way that the public can understand.
Walvis Bay Resident	understand?	NMP will try to bring the details of the study down to a level where it can be understood but we still need to understand that this work is done by specialists is complicated and needs experts to understand and assess the findings. One must not lose sight of the fact that these are highly complicated and complex issues, there is a risk of trying to reduce the studies down to very simple statements because the facts may then be at risk of being misinterpreted or misrepresented, accordingly there is there is a responsibility by scientists to not oversimplify or



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		understate facts related to complicated issues.	
Rodney Braby	Diamond mining shouldn't be	That is correct. Not trying to compare them in terms of sensitivity and scale. We are	
	compared to phosphate mining	looking at the setting of those deposits and the setting of the diamond deposits is	
GIZ	because they are in different areas	also on the Namibian continental shelf at water depth of 150m, which is 50m	
	and have different habitats.	shallower than the marine phosphate deposits that occur on the continental shelf	
		at 200-2225m in this case. The actual operation of both phosphate and diamond	
		mining involves seabed excavation It is only the chemistry of the sediment in the	
		two areas that are slightly different that makes them not directly comparably but	
		for all other intents and purposes, they are in equivalent settings on the Namibian	
		continental shelf in terms of approximate water depths and in terms of	
		environmental sensitivity in which they find themselves.	
John Esterhuizen	When you look at what a mine does	The pilot work for the project has been done in Johannesburg during the feasibility	
Municipality of Walvis	when they don't know what may	study for the land-based materials processing plant. From a marine side, tried and	
Вау	happen, they usually build a mini-	tested dredging equipment and methods are going to be used by an experienced	
	mine first. The public is concerned	international dredging contractor using a standard dredging process with some	
	about the project. Has the proponent	modification to the dredger to extend the range of the dredge arm.	
	thought of starting a pilot project first		
	to assess the potential impacts?	Mitigation and risk assessment has also been done as part of the feasibility study.	
		Public concerns related to the project are taken into account through this scoping	
		process for the current ESIA and application.	



Namibian Marine Phosphate (Pty) Ltd

# Table 5 - Comments received via email or telephone and feedback

	General I & AP comments		
	Submitted via email or pl		
Stakeholder Name	Comments/Questions Received	Response/Clarification	
and details			
David Russell	Concerned that the operations of Namibian Marine	Comments noted. These aspects will be fully assessed in the	
	Phosphates do not harm the Namibian commercial	current ESIA process. Previous comment in relation to these	
Federation of Namibia	fishing industry, including aquaculture, or the Benguela	concerns as noted herein refer.	
Fishing Associations	Current marine ecosystem, and that the onshore		
	operations linked to processing do not harm the		
	inhabitants of Walvis Bay and the surrounding		
	environment.		
Phil McCabe	How do we know that the EAP has no direct business,	Comment noted. The statement is correct. In accordance with	
	financial, personal or other interest in the approval or	the provisions of the Environmental Management Act 2007,	
Deep-Sea Conservation	refusal of the application? Are their interest is in the	Regulation 3, the Proponent is required to designate an	
Coalition	protection of the marine environment?	environmental assessment practitioner (EAP) to manage the	
		assessment process. The obligations and requirements for the	
		EAP are defined in Regulation 4 of the Act which includes	
		requirements for full disclosure and obligations to present all	
		relevant findings even if this results in findings that are not	
		favorable to the applicant.	
Knowledge Ipinge	How can Phosphate mining and the Fishing industry co-	Considering the environmental studies completed and reported	
	exist? Training and development opportunities for the	to date on the Sandpiper Project, the best available scientific	
Affirmative	local youth.	evidence and expert opinions indicate there is no reason why	
Repositioning:		phosphate mining and the fishing industry could not co-exist.	
Community Activism		The proponent has encouraged constructive engagement with	
		the fishing industry in this regard and remains open to develop	
		opportunities to facilitate constructive co-existence.	



	General I & AP comments		
Chalashaldan Nama	Submitted via email or pl		
Stakeholder Name	Comments/Questions Received	Response/Clarification	
and details	Internetical in the offerte of mining on the maxim	Comment noted. These offers have been used at a device where	
Desmond Tom	Interested in the effects of mining on the marine		
Ministry of Ficharias	environment	2014 and will be assessed in the light of new studies completed	
Ministry of Fisheries and Marine Resources		in 2020 as part of the current ESIA process.	
Chris Brown	Interested in projects undergoing due process and then	Comment is well noted.	
	decisions being evidence-based on best available		
Namibian Chamber of	information, while taking known and anticipated risks		
Environment	into account - not on uninformed emotion.		
Marcia Fargnoli	Impacts on the Ocean	The comments are noted and are extracted directly from the	
		ongoing petition document posted on 26 May 2016 on the	
Earth Organization	-Dredging of 3-6 meters of the seafloor will cause direct	organization's website. The statements on the website and in	
Namibia	irreparable destruction to the building blocks of the	the petition (as submitted here) are not supported with scientific	
	marine ecosystem in the benthos layer causing direct	evidence-based data or references. Certain statements are	
	harm to the food supply chain for endangered sea	factually incorrect and emotive.	
	turtles, endangered marine mammals, fish and		
	humans.	Factual scientific and evidence supported specialist studies	
		addressing all the of the broad topics of concern have been	
	-There will be direct harm to hatcheries for fish species	completed, including additional studies in 2020.	
	such as juvenile monk and hake.		
		The studies completed to date show no evidence to support any	
	-There are serious potential negative effects on the	of the claims made in the statement provided by Earth Watch	
	spawning of fish.	Namibia.	
	There are carious notential negative effects of a	The surrent ESIA process will assess all the key sensors areas	
	disturbed ecosystem (turbidity) on marine predators	The current ESIA process will assess all the key concern areas broadly noted in the statement and will be based on the best	
	distance ecosystem (tarbiaity) on marine predators	broadiy noted in the statement and will be based off the best	



	General I & AP comments			
Stakeholder Name and details	Submitted via email or pl Comments/Questions Received	Response/Clarification		
	<ul> <li>including hake and endangered African penguins.</li> <li>-The release of hazardous substances including radioactive materials, methane gas, and hydrogen sulphides will directly kill wildlife and cause many commercial fish stocks including hake and monk to be unmarketable and not sale quality as food quality regulations for export are stringent.</li> <li>Plumes will negatively affect zooplankton, another building block of the Benguela current marine ecosystem, further causing harm to marine wildlife including endangered marine mammals.</li> <li>Soluble phosphate entering the water and acting as a fertilizer will increase algal blooms and harm shellfish and other species.</li> <li>Change in the nutrient balance in upwelling will affect the Benguela Current marine ecosystem which relies heavily on the upwelling of nutrients that are carefully balanced.</li> <li>-Noise and hazardous waste pollution will directly affect and potentially damage endangered marine mammals irreversibly.</li> </ul>	available evidence-based science and information. while taking known and anticipated risks into account.		



	General I & AP comments		
Stakeholder Name and details	Submitted via email or pl Comments/Questions Received	Response/Clarification	
	-Increase in phosphate nutrients will increase algae and bacteria in the water making salt for salt mining too poor of quality for sale.		
	-Poor quality seawater will hamper the aquaculture industry.		
	Impacts on the Ocean		
	-Dredging of 3-6 meters of the seafloor will cause direct irreparable destruction to the building blocks of the marine ecosystem in the benthos layer causing direct harm to the food supply chain for endangered sea turtles, endangered marine mammals, fish and humans.		
	-There will be direct harm to hatcheries for fish species such as juvenile monk and hake.		
	-There are serious potential negative effects on the spawning of fish.		
	- There are serious potential negative effects of a disturbed ecosystem (turbidity) on marine predators		



	General I & AP comments		
	Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
and details	<ul> <li>including hake and endangered African penguins.</li> <li>-The release of hazardous substances including radioactive materials, methane gas, and hydrogen sulphides will directly kill wildlife and cause many commercial fish stocks including hake and monk to be unmarketable and not sale quality as food quality regulations for export are stringent.</li> <li>Plumes will negatively affect zooplankton, another building block of the Benguela current marine ecosystem, further causing harm to marine wildlife including endangered marine mammals.</li> <li>Soluble phosphate entering the water and acting as a fertilizer will increase algal blooms and harm shellfish and other species.</li> <li>Change in the nutrient balance in upwelling will affect the Benguela Current marine ecosystem which relies heavily on the upwelling of nutrients that are carefully balanced.</li> <li>Noise and hazardous waste pollution will directly affect and potentially damage endangered marine mammals irreversibly.</li> </ul>		



	General I & AP comm	ients	
	Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
and details	<ul> <li>-Increase in phosphate nutrients will increase algae and bacteria in the water making salt for salt mining too poor of quality for sale.</li> <li>-Poor quality seawater will hamper the aquaculture industry.</li> <li>Impacts on the Land</li> <li>-According to the Environmental Impact Assessment, 125,500 tonnes of phosphate and radioactive and other waste will be discharged onshore during each week of operation, with the transfer to shore being once every 2-3 days. These are radioactive substances that will certainly have numerous environmental impacts, especially on human and environmental health.</li> </ul>		
	-A buffer pond containing radioactive substances is set to be placed by the internationally protected RAMSAR site of Sandwich Harbor and a National Park, causing direct harm to the legally protected land ecosystem.		
	-A pipeline will cross through two National Parks carrying radioactive substances, further exposing the public and the wildlife to radiation.		



	General I & AP comments		
Submitted via email or ph           Stakeholder Name         Comments/Questions Received		none call Response/Clarification	
and details			
	-A processing plant and tailings dam by the sewerage		
	works in Walvis Bay will disperse radioactive materials and chemicals into underground water and through the		
	air.		
	-The potential for flood events and sea-level rise will		
	cause radioactive and chemical waste to be released		
	throughout the town of Walvis Bay as well as into the surrounding National Parks.		
	-Plans to release waste products and seawater back		
	into the ocean will cause additional negative impacts on		
	marine life.		
	-Water requirements of 320 cubic meters of fresh non-		
	potable water per hour will impact the local desert		
	communities and environment to which this freshwater		
	is a vital resource, especially in the hyper-arid coastline during times of drought.		
Peter Etsebeth	Will All mining-related waste I come to the Walvis Bay	Tailings from shore-based processing activities will be stored in	
	landfill site	an appropriate tailings' disposal facility. The land-based	
Municipality of Walvis		activities will be subject to a separate ESIA process in due	
Вау		course.	
Coleen Mannheimer	As has happened before with a uranium project, I find	The BID is prepared in accordance with the EMA (2007) to	
Concerned Citizer	that this BID supplies insufficient information to allow	provide adequate background information on the project to	
Concerned Citizen	I/APs to get a clear idea of what is planned and, as a	enable the public to contribute to the determination of the	



	General I & AP comments		
	Submitted via email or pl		
Stakeholder Name	Comments/Questions Received	Response/Clarification	
and details			
	result, it is not possible to express concerns in detail.	scope of activities to be conducted in the detailed ESIA process	
	Amongst others, I would be interested to know where	and report. The detailed ESIA is then provided to the public to	
	in the world this has been done before, why you think	enable further comments.	
	that only MME should make decisions rather than both		
	them and MFMR. Also, there is no information on what	The proposed activity is essentially a seabed dredging operation	
	fraction of the mining area will be left undisturbed for recolonization and how this will be achieved (and some	which is common practice internationally and in Namibia.	
	references to access where this has been achieved, and	Decisions regarding environmental clearance certificates are	
	how, elsewhere). There is little information on land-	made by the Environmental Commissioner in consultation with	
	based activities and what resources they will require.	all relevant competent authorities, including MME and MFMR.	
		The scale of the proposed dredging operations will access an average of 1.7km <sup>2</sup> seabed on an annual basis (<0.1% of ML170 area) and a total of 34km2 over the 20 year (<2% of ML170 dredging operations in ML170.	
		Land based activities will be addressed fully in a separate ESIA	
		process to follow after permitting of the marine component in ML170 has been completed.	
Sarah Yates	I have concerns about biodiversity loss (bathypelagic	Comment noted. Impacts related to the potential risk of	
	fish mortality, sessile organisms), the noise, light,	biodiversity loss, and water column related to heavy metals,	
Namibia Scientific		including uranium, sediment plume dispersion, toxicity,	
Society	increased temperature (influence growth,	bioaccumulation and cumulative effects have been assessed in	
	reproduction, and metabolism) in the water column	specialist studies completed it the 2014 EIA verification study	
	due to mining operations. How the altered	and further studies have been since completed in 2020.	



General I & AP comments		
Submitted via email or phone call		
Stakeholder Name	Comments/Questions Received	Response/Clarification
and details		
	environment will favour jellyfish populations. I also	
	have concerns over who will benefit from this project?	
		The results of previous and recent studies will be utilised to
		assess the potential risks as part of the current ESIA process.
Johannes Muzanima	How is the product will be transferred to Walvis Bay?	The product will be transported to Walvis Bay by the dredge
	Will the vessel used to be registered in Namibia and	vessel.
Ministry of Works and	employ Namibians in key positions? or what will	
Transport, Directorate	Namibian seafarers benefit from? Will there be a	International the dredger to be used is owned and operated by
of Maritime Affairs,	chemical reaction between phosphate and seawater	international dredging Contractor Jan De Nul. Jan De Nul will
Walvis Bay	that already contain other dissolved elements? If yes,	establish an operational support office in Walvis Bay which will
	what will be their impact on marine life, water pollution and the coastal community?	operate support vessels to service the dredging operations onsite which will provide opportunity for employment of Namibians.
		The biogeochemical aspects of interaction between dredged phosphate bearing sands and sea water and related potential risks for pollution have been assessed in specialist studies completed in 2014 and more recently in 2020. The potential impacts will be assessed as part of the current ESIA process.
Anja Kreiner	How far do possible plumes travel before settling on	Detailed ocean current and sediment plume dispersion
	the seafloor? What is the composition of the sediment -	modelling was completed in 2020 by UK based specialist group
Ministry of Fisheries	any heavy metals (Uranium?)	HR Wallingford. Summary results of the study were presented to
and Marine Resources		MFMR at the stakeholder meeting on 11 <sup>th</sup> March 2022 (refer



General I & AP comments		
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		minutes of meeting as attached in the scoping report). Additionally heavy metal concentrations in the sediment have been reported in the 2014 EIA verification study and more recently in 2020. The assessments to date included an assessment of uranium content. The aspects of plume dispersion and heavy metal concentration will be assessed and reported in the current ESIA process.
Hans Hückstedt LL Namibia Phosphates	1. Seabed mining in Namibia is not a new commercial activity. For over 27 years, the marine diamond mining industry has co-existed in the same marine ecosystem	Comment Noted.
(Marine exploration, mining and beneficiation of industrial minerals)	as the fishing sector, allowing for both industries to become major economic contributors. To ensure the co-existence of marine industries can continue and their environmental impact is kept to a minimum, both the marine diamond and fishing industries are monitored and managed. The same approach should also be considered for marine phosphate mining in Namibia, which has a comparatively smaller footprint than marine diamond mining and fishing. What is important and comforting to know is that adequate controls and measures already exist in current legislation to regulate marine phosphate mining activities, alongside existing commercial marine activities (Minerals Act 1992, Environmental Act 2009).	
	2. For the last 25 years marine diamond mining in	



	General I & AP comm	ients	
	Submitted via email or phone call		
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	Namibia has co-existed along with the fishing industry in the same marine ecosystem.		
	Over this time both industries became and remain major economic contributors to Namibia. The co- existence of marine industries and the minimal environmental impact of both the marine diamond and fishing industries are proof of the well monitored and managed environmental plans. Similarly, this approach should also be considered for marine phosphate mining in Namibia. Namibia is in a very fortunate position of being world leaders in marine diamond mining and the experience and knowledge drawn from this should be used for the development and decision-making of future seabed mining. What is important to understand is that adequate environmental controls and measures already exist in current legislation to regulate marine phosphate mining activities alongside the existing commercial marine activities.		
	Abundant conclusive physical evidence and an extensive body of scientific data on the recovery of the seabed have been gathered over the past +20 years, and the two main findings of the 2008 BCLME Report on the Cumulative Impacts of Seabed Mining (over 10		



	General I & AP comments	
Submitted via email or phone call		none call
Stakeholder Name and details	Comments/Questions Received	Response/Clarification
	years) are that:	
	i) The impacts of seabed excavation for marine diamond mining do alter the habitat in the mining area but are not significant at the scale of the operations when compared to the overall marine ecosystem.	
	ii) The seabed does recover over time, albeit at differing rates.	
	The scientific evidence available, and a comparison of other areas employing similar mining methods, confirm that a mutual co- existence of sectors is possible and the inclusion of marine phosphate mining into the marine ecosystem will neither be detrimental to Namibia's fishing sector nor her environment.	
Walter Hansen Ocean Conservation Namibia	Long term effects of the project on local ecosystems as well as the health and safety of the community.	Ecosystem impact modelling was completed as part of the specialist studies included in the EIA verification study. Potential long-term ecosystem and related impacts will be assessed including data from new studies completed in 2020 and reported in the current ESIA process.
Jeffrey Harris	The Southern population are very dependent on feeding	Specialist studies related to potential impacts on breeding areas



	General I & AP comments	
Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification
Ocean Conservation Namibia	on young hake. It could be that the project affects the breeding areas of the hake population.	of hake have been conducted and will be assessed as part of the current ESIA process.
Jason Angala Wet Landed Horse Mackerel Association (WLHMA)	Object to the 'proposed' ML-170 mining zone as indicated on the draft MSP as per objection presented to MSP consultation on 21 February 2022. The area North of 25.25 degrees is a crucial and dedicated fishing area for the wet horse mackerel sector. The sector has invested over NAD 1.5 billion to date and employs 1,450 Namibians, this figure will increase to approximately 3,000 during 2022 and will grow beyond that. We are the only sector with significant growth in terms of onshore employment in the fishing industry, especially for women and youth in line with the NDP5.	Comments noted. The matter refers as an issue related to marine spatial planning and operational access. No issue relating to environment have been raised. Potential environmental and operational impacts on all forms of commercial fisheries will be assessed as part of the current ESIA process, based on best available data and information.
Jean-Paul Roux Marine Ecologist	My main interest is the potential impacts (and the methods to mitigate them) on the marine ecosystem (particularly the food web), the species of conservation	Ecosystem impact modelling was completed as part of the specialist studies included in the EIA verification study.
	concern and the fisheries resources like the hake stocks.	Potential long-term ecosystem and related impacts will be assessed including data from new studies completed in 2020 and reported on in the current ESIA process.
Bronwen Currie	<ol> <li>Environmental regulation of deep-sea (defined as in water depths of 200m and deeper) mining has received focused attention worldwide in recent years with the formulation of rules and guidelines. In that regard, Namibia's responsibilities as a signatory to the United Nations Convention of the Sea (UNCLOS) and a</li> </ol>	1. The pelleted marine phosphate deposits in ML170, as well as the marine diamond deposits further south, are relict and/or placer sedimentary deposits that occur on the inner and middle continental shelf of Namibia in water depths of up to 300m generally. They are not classified as deep-sea minerals which, as noted in numerous scientific publications, comprise a



	General I & AP comments Submitted via email or phone call	
Stakeholder Name and details	Comments/Questions Received	Response/Clarification
	member of the International Seabed Authority (ISA), require that "national regulatory measures shall be "no less effective than international rules, standards and recommended practices and procedures" under Art 208 (3) of UNCLOS". Whilst Namibia has sovereign rights to her mineral resources, she does not have sovereign rights to harm her ocean waters (UNCLOS). The alignment of environmental assessments for deep-sea mining in Namibia must be judged accordingly. Regarding previous impact assessment studies and reports for the proposed NMP phosphate mining project, basic baseline information upon which impacts were assessed is lacking or erroneously interpreted.	<ul> <li>specific suite of polymetallic nodules, cobalt crusts and seabed massive sulphides that are formed by processes occurring in specific deep-sea environments on the Continental Slope and Abyssal Plain at water depths of 1000-6000m.</li> <li>Application of the nominal depth of 200m as the criteria for classification of deep-sea mining in is not unequivocally supported in scientific literature.</li> <li>Territorial Sea and Exclusive Economic Zone of Namibia Act, 1990, Act No. 3 of 1990 determines and defines the internal waters, territorial sea, contiguous zone, exclusive economic zone and continental shelf of Namibia in accordance with the provisions of UNCLOS which is based on the physical features of the continental shelf and distance from shore and is not based on water depth as defining criteria.</li> <li>UNCLOS Article 193 confirms the sovereign rights of States to exploit the natural resources within their Economic Exclusive Zone pursuant to their environmental policies and in accordance with their duty to protect and preserve the marine environment. Administration and regulation of activities in the Namibian Exclusive Economic zone falls under Namibian law.</li> </ul>
	2. In line with the NMP EIA process re-starting in 2022, the applicable international rules, standards and	Comments 2, 3, 4, 5 and 6 are noted. In this regard relevant baseline and specialist environmental impact assessment studies



	General I & AP comments		
	Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
	<ul> <li>guidelines are publicly available for guidance and reference, as are hundreds of scientific and legal publications within the past six years, and ongoing. The piecemeal variety of reports and documentation submitted by NMP to MET since 2012, appears to disregard these valuable resources.</li> <li>3. Impacts can be formulated using only accurate baseline studies, which are essential. So that scientifically credible baselines are used for impact assessments that are particular to deep-sea mining in Namibia, the appropriate baselines should be derived from sampling and analyses according to accepted international standards. Without such basic work, the impact assessments presented in the ESIA will be no better than guesswork and will continue to be challenged. The NMP reports to date contain scientific methodology that is below standard, outdated, or incorrect, thus the given assessments are not scientifically credible, and on a scientific basis cannot be accepted. The statement at the public meeting in February 2022 that past specialist studies will be reused in the present ESIA refers, and is therefore questioned? And will be interrogated further as necessary when reports become available.</li> </ul>	utlising appropriate methods have been completed covering the key areas of concern and reviewed by external experts. Further supplementary studies on key aspects of sediment plume dispersion and toxicity have been completed in 2020 to further address the key concerns as noted. Assessment of the potential impacts will include data from new studies completed in 2020 and will be reported in the current ESIA process, incompliance with relevant procedures and guidelines applicable under Namibian law and any related international legal obligations thereunder.	



General I & AP comments Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification
	<ul> <li>4. As the entire ESIA process has begun anew in 2022 (indicated by request for the initial step of "scoping" at public meetings in February 2022) the following are required by the EPAs managing the ESIA: <ul> <li>a. Robust baseline studies according to international best practice guidelines: see for example attached annotated document which is publicly available. These include:</li> <li>b. Detailed water column studies to allow impact assessment on the entire pelagic ecosystem and the services delivered</li> <li>c. Detailed analysis of heavy metal and radionuclide concentrations in 2-3m deep sediments (gravity cores) in mining areas</li> <li>d. Detailed current data and modelling of plumes</li> <li>e. Toxicological studies, with particular to the plume delivery and suspension time of the finest sediment particles in the pelagic ecosystem, includes:</li> </ul> </li> </ul>	



	General I & AP comments		
	Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
	<ul> <li>particulate matter in plumes, on marine life during the lifetime of excavation and transfer of bulk seabed material i.e., cumulative impacts over the lifetime of the mine. Special attention should be paid to fine particles transporting heavy metals and radionuclides.</li> <li>g. Improvement in all other aspects already identified or commented on, by any party, in the preceding 2012 – 2018 reports submitted to MET.</li> <li>5. It is appreciated and apparent that neither the local public, nor the EPAs, nor the proponent, are familiar with deep-sea biology and deep-sea ecosystem services in their daily lives (and for the ocean, this cannot be expected). Therefore, for easy understanding of the necessary studies, examples of international guidelines for baseline studies are attached, partly annotated with comments related to particularly important shortfalls or non-adherence in the previous NMP studies. Fortunately, these types of guidelines are up to date, written by world experts in their fields, and publicy available.</li> </ul>		
	6. Should the detailed methodology for the necessary scientific studies specifically pertinent to the NMP		



General I & AP comments		
Submitted via email or phone call		
Stakeholder Name and details	Comments/Questions Received	Response/Clarification
Stakeholder Name         and details         Naude Dreyer         Ocean       Conservation         Namibia:       Co-Founder	Comments/Questions Received         application in Namibia regarding:         a. Water column communities         b. Sediment biogeochemistry         c. Toxicology         d. Connectivity         e. Ecosystem services         1. There were numerous baseline and impact assessment studies commissioned for this project. Are the results of those studies available to the public? In particular, is the HR Wallingford Plume Dispersal Assessment available for public scrutiny?         2. You mentioned in the public meeting that an independent monitoring authority will need to be established. Will this monitoring authority make all findings public?	Response/Clarification         1. All information and studies relating to the current ESIA Report and process will be made available to registered I&APs during the ESIA process and will be available on EAP and MEFT data portals.         2 and 3. any decisions or actions in relation to these suggestions reside with the office of the Environmental Commissioner.
	3. Will the above-mentioned authority have the power to cease all offshore operations if findings show that any	



	General I & AP comments		
	Submitted via email or pl		
Stakeholder Name	Comments/Questions Received	Response/Clarification	
and details			
	variables of the process are outside of acceptable parameters?		
	4. In your proposed plan, what is your worst-case scenario in terms of environmental fallout, and what mitigation measures will be taken to rectify this? Would there be special financial provisions made for this?	4 Provision for environmental incidents is incorporated in insurance and operational procedures to be approved for the project.	
	5. Are we correct in believing that the land-based proponent of this project has its own public information sessions, ESIA, EIA and EMP? There seems to be almost no information on this part of the project available at all right now.	5. Yes, the full ESIA process will be completed for the land-based component of the project, once permitting of the marine operations in ML170 has been completed.	



Namibian Marine Phosphate (Pty) Ltd

# Table 6 - Comments received during the Walvis Bay community engagement meeting

	Walvis Bay community engagement meeting		
19 October 2022			
	18:00 – 19:00		
	Lutheran Evangelical Church	Kuisebmond	
Stakeholder Name and details	Comments/Questions Received	Response/Clarification	
Ronnie Soabeb	What is the lifespan of the first mining target which is currently applied for?	Currently the life of mine is 20 years for the SP1 target within ML 170.	
Walvis Bay resident	How many people will be employed for both marine and the land-based industry?	The marine will be between 72 – 100 people, whereby the land- based will be over 600 direct and indirect jobs.	
	What are the next steps required for the project to start operating?	the Proponent can start with the land-based assessment. During this time the Proponent will commence mobilising for the marine mining operations, advertise jobs and commence with the monitoring work identified in the EMP for the 12 months start up before operations. Mining cannot commence if there is no buffer pond and process plant to process the material.	
	When will the land-based operations assessment commence?	As soon as the environmental clearance certificate is used by MEFT.	
	When will the jobs be advertised?	Within 12 months of the environmental clearance certificate being issued.	
	Where exactly is the ML 170?	ML 170 is located offshore, about 160 km from Walvis Bay, between Walvis Bay and Lüderitz at the 200 m isobath. The draft ESIA report was taken to the I&AP to show a schematic of ML 170 and SP1 mining target area.	
	What are the Project impacts on our seals population	This was assessed during the specialists study. Seals are mobile mammals that migrate through ML 170 and should not be	



comments from I&APs

	Walvis Bay community engage 19 October 2022 18:00 – 19:00	5						
	Lutheran Evangelical Church Kuisebmond							
Stakeholder Name and details	Comments/Questions Received	Response/Clarification						
	or will there be no impact?	disturbed and there will be a minimal impact.						
	What measures are there to ensure that the sucked-up Phosphate deposits are not discharged onto our land?	This will be assessed during the land-based component application. The processing plant uses no chemicals, however the Namibian seabed has natural occurring heavy metals and radiation (uranium) that workers and the environment can be exposed too during operations. The ore from the hopper will be discharged first into the buffer pond, which location is still to be determined and thereafter continue in the process.						
Tuhafeni Matatias	What are the mitigation plans are there to ensure that	The tailings storage facility will be built to international						
Walvis Bay resident	there will be no pollution from the tailing facility and processing operations?	standards and lined to prevent contamination. The operations will be a closed loop circuit with pipelines and infrastructure designed to prevent spills and pollution.						
	Where will the processing plant be suited in Walvis Bay?	This will be determined during the land-based assessment. All required stakeholders will be engaged from Walvis Bay.						
	What percent of the commodity stays in the country?	The fertilizer will be sold within Namibia and exported.						
	Is this the same Phosphate Project from 2014? What	Yes. The initial ESIA assessment was conducted in 2012,						
	were the outcomes of the previous ECC process and is	whereby additional baseline assessments were carried out in						
	this a continuation of the previous studies done?	2014 based on feedback received by I&APs to conduct additional studies. A court case raised in 2016 paused the application process, which was only concluded in 2021, whereby the High Court found that the previous ECC issued was not valid and the Proponent had to continue with a new ESIA process.						

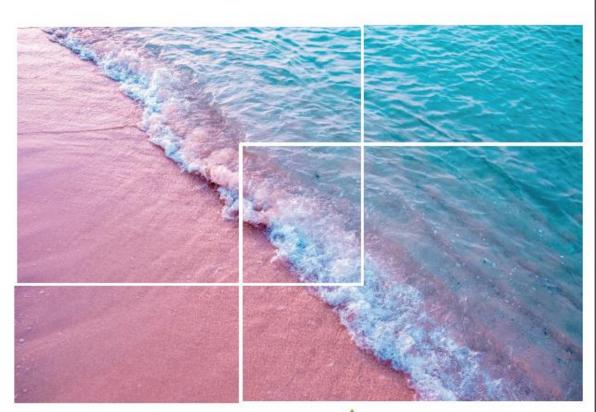


#### comments from I&APs

	Walvis Bay community engage	ment meeting						
	19 October 2022							
	18:00 – 19:00							
Lutheran Evangelical Church Kuisebmond								
Stakeholder Name and details	Comments/Questions Received	Response/Clarification						
		Additional studies have been conducted between 2018 to 2022 in order to support this current ESIA application and have been included in the current assessment and ESIA report.						
	What makes you as an EAP competent to conduct this assessment?	The EAP is made up of a team that oversees the ESIA process and the assessment conclusions are based on scientific evidence from specialists.						
Marvin Muatunga	Can you shed light on the newspaper article discussing the ML and ECC for this project.	The current ML 170 is valid and issued by MME. The current process now is for the application of an environmental						
Walvis Bay resident		clearance certificate with MEFT. There is currently no valid environmental clearance certificate for the Project.						
Johannes Xoagub	My interest is more on the employment, where can one find the vacancy adverts for the company?	Job vacancies will be advertised in local newspapers and on the NMP website.						
Walvis Bay resident								



## **APPENDIX A – BACKGROUND INFORMATION DOCUMENT (BID)**





#### Namibian Marine Phosphate

Submitted to: Namibian Marine Phosphate (Pty) Ltd Attention: Mr Chris Jordinson Private Bag 5018 7 Auob Street, Meersig Walvis Bay

## **REPORT:**

BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED SANDPIPER MARINE PHOSPHATE PROJECT WITHIN ML 170,

## OFFSHORE, NAMIBIA.

PROJECT NUMBER: ECC-133-377-BID-02-B

**REV 02** 

DATE:

**REPORT VERSION:** 

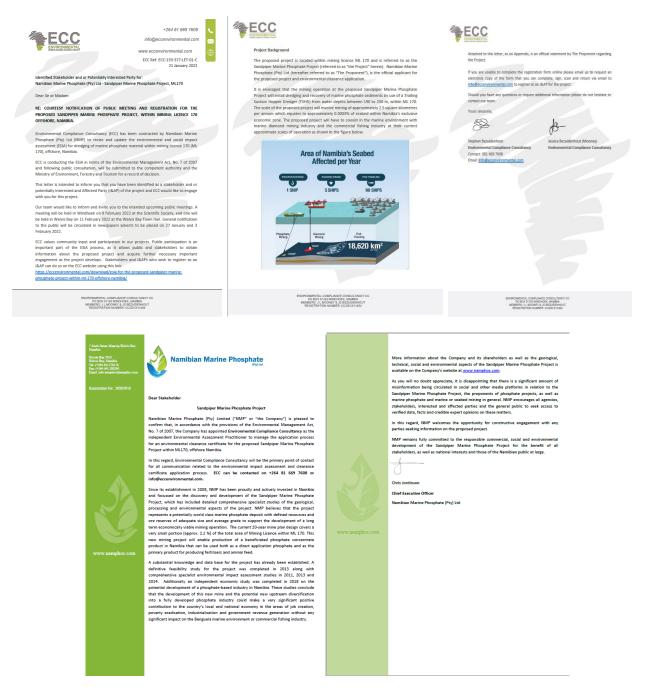
23 FEBRUARY 2022







# APPENDIX B – STAKEHOLDER PRE-CONSULTATION ENGAGEMENT INVITATION





















## **APPENDIX C – ADVERTS PUBLISHED**

The Market Watch: The Namibian Sun, Republikein and the Allgemeine Zeitung newspapers, 27 January 2022

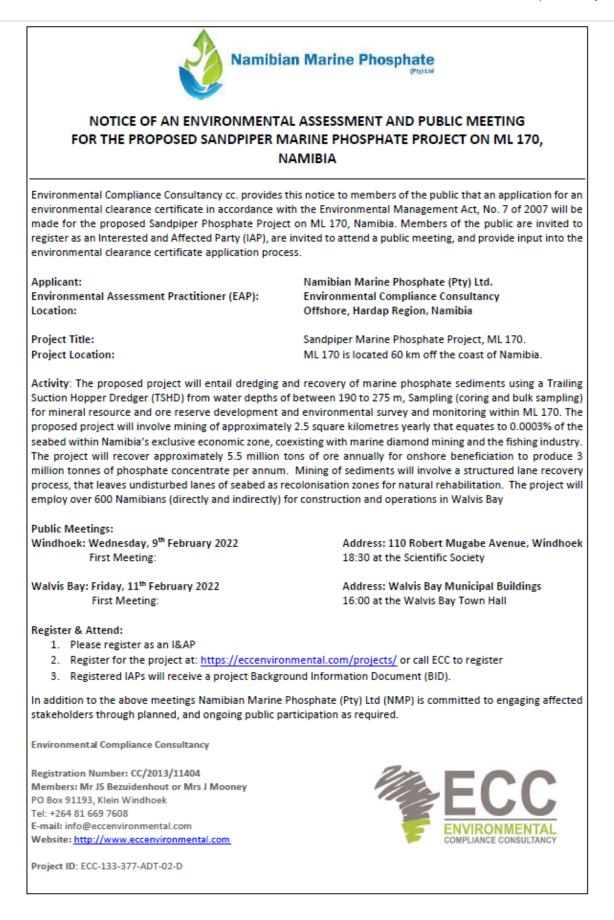




The Market Watch: The Namibian Sun, Republikein and the Allgemeine Zeitung newspapers, 3 February 2022









## **APPENDIX D – PUBLIC MEETING PRESENTATION**



SANDPIPER MARINE PHOSPHATE PROJECT

Ministry Application Reference Number APP - 003397



www.eccenvironmental.com

#### AGENDA

- Main Objectives
- Background Information
- Environmental & Social Impact Assessment (ESIA) Process — Presented by ECC
- NMP Presentation Presented by Mike Woodborne
- Potential Biophysical & Socio-economic Impacts Presented by ECC
- Baseline Studies
- Public Participation



#### **Meeting Objectives**

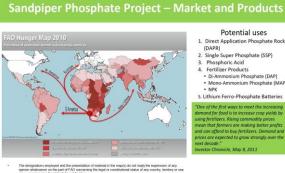


- ✓ Provide information describing the proposed Sandpiper Marine Phosphate Project
- Provide an overview of the independent environmental and social assessment process
- Listen to the public and recorded issues or concerns, and incorporate this into the assessment process





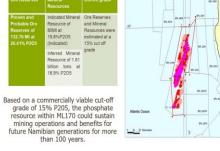
## Namibian Marine Phosphate (Pty) Ltd



While lithium-iron-phosphate (LFP) batteries make up only a small percentage of the

specialty phosphate market, they are forecast to see continued growth. It's worth noting Phosphate Outlook 2022: Geopolitics to be a Key Market Mover Georgia Williams Jan. 26, 2022 02:00PM PST that LFP technology isn't new — it is one of the original battery formulas — but it was phased out in the early 2000s due to lack of efficiency.

#### 1. Direct Application Phosphate Rock 2. Single Super Phosphate (SSP) 3. Phosphoric Acid 4. Fertilizer Products • Di-Ammonium Phosphate (DAP) Mono-Ammonium Phosphate (MAP) 5. Lithium Ferro-Phosphate Batteries emand for food is to increase crop yields by sing fertilizers. Rising commodity prices nean that farmers are making better profits nd can afford to buy fertilizers. Demand and rices are expected to arow stronaly over the



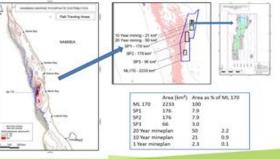
**Mineral Reserves and Resources** 



**Beneficiation Process** 



## 20 Yr Mine Plan - Scale and Perspective



### What are the Project Stages?







ECC

ESIA PROCESS

#### related comments from I&APs

Namibian Marine Phosphate (Pty) Ltd

#### **Related Industrial Developments**



What Permitting is Required for a Project to Begin?



#### **Activities and Permitting**

Part 1	Part 3	Part 4	
Operations outside of ML170	Operations outside of ML170	The following activities will then take place onshore subject	
<ul> <li>Sail to dredging site, 120km from Walvis Bay.</li> </ul>	(which form part of the Onshore Project and Environmental Clearance application to follow)	to site allocation by relevant authorities  Construction and operation of the dredger discharge facility a buffer ponds to receive and store dredged phosphate ore for	
Part 2	Sailing to Walvis Bay for discharge of the one to shore-based facilities	processing within Namport property limits	
Operations in ML170 (this application)	Connecting to a dolphin mooring, with     attached flexible pipeline or dedicated	Construction and operation of the process plant infrastructure and concentrate product storage facilities within municipal and/or state property limits     Construction and operation of the tailing's storage facility and related servicides, within municipal and/or state property limits     Construction and operation of the vessel berthing and loading facility within Namoor traperty films	
<ul> <li>Dredging on a north or south heading, (swell dependent) with the continual engagement of the dredge arm and drag head, recovering sediment in a 3 mm wide x 0.75 m deep swath, until the vessel hopper of 46.000 m is filled.</li> </ul>	actached rekole pipeline of obstacted discharge beth, pumping (sihi)s pumps) the slumy ashore to a holding pond, disengage • Sailing back to the operational location and continue dredging.		



#### **Public Participation**



- Public notification of the project
- Background Information Document (BID) provided I&APs
- Public provided the opportunity to take part in the public participation process
- Direct consultation and focus group meetings with required stakeholders
- This presentation extracts information from the BID to describe the project to those attending the meeting.



ECC

Namibian Marine Phosphate (Pty) Ltd

## Potential impacts to be assessed

- Potential impacts that can arise from the proposed project may include but are not limited to:
- Effects on marine benthic fauna
- Modification to the water column
- Interference with fish behaviour
- Implications for the commercial fishing industry
- Implications on marine fauna
- · Job creation and skills development
- Social upliftment
- Regional and national economic benefits
- Others both socioeconomic and biophysical



Investment

<b>Baseline and Impact Assessment</b>
Studies Commissioned to date

Consultants		a contraction of the second
		Fisheries seabirds and mammals
D Japp	Capfish	Fisheries
James Gaylard	Capfish	Biomass and Stock Estimates Hanke and
		Monkfish
Dr Hilkka Ndjaula	Unam	Reproductive Dynamics, recruitment and
		stock dynamics
Prof Mark Gibbons	UWC	Jellyfish
Dr Dave japp	Capfish	Seabirds and Mammals
Dr Dave japp	Capfish, MFMR	Marine Biodiversity Study
Dr Kevern Cochran	Capfish	Ecosystem assessment
Dr Dave japp	Capfish	Noise
	1	Water column and Sediments
Dr Robn Carter	Lwandle	Current Velocity and water mass
( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( )		Dissolved Oxygen
		Surfical Sediments
		Particulate Organic Matter concentraitons
	12	Inorganic Nutrient Levels
		Oxidative State
		Heavy Metal concentrations
		Hydrogen Sulphide
		Sediment Toxicity Study (pre-dredging)
S	1	Benthos
Dr Nina Steffani	Steffani Environmental	Macrobenthos
Same a second of the	in the second	Plankton
Dr Bronwyn Kirby	UWC	Thiobacteria Study
Sebastian Brown	CSIR	Analytical methods
Dr Simon Foster	Pgysilia , UK	Meiofauna
Dr Tim McClurg	KZN Coastal Impact	Epifauna
providence of the second se		Plume Dispertion Modelling
Roy Van Ballengooyen	CSIR	Plume Dispertion Modelling
HR Wallingord (UK)	HR Wallingford	Plume Dispersion Modelling Detailed
		Geology and Physiography
Dr John Compton	UCT	Depositional History of Phosphate
Gordon Rigg	Marine Data Consultants	Seabed Physiography and habitat

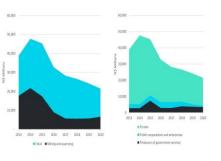


#### Socio Economics - Sandpiper Project

#### At a project level, if it were to be implemented, NMP's Sandpiper Project will:

 employ over 600 Namibians (directly and indirectly) for construction and operations in Wahvis Bay
 create opportunities for SMEs and other economic sectors
 spend an estimated N§ 1 billion on civil and local infrastructure
 require a capital investment of N§ 5.2 billion for the development
 expect an annual revenue of N§ 4.2 billion
 contribute direct taxes of N§ 650 million/year
 contribute royalties of N§ 78 million/year





#### What you can do!

- Provide in writing, any issues and suggestions regarding the proposed development. This correspondence must include:
- 1. Name & Surname;
- 2. Organization represented;
- 3. Position in the organization;
- 4. Contact details and;
- Any direct business, financial, personal or other interest which you may have in the approval or refusal of the application.
- All initial contributions, comments and concerns must be submitted by 25<sup>th</sup> February 2022.
- Send written submissions to info@eccenvironmental.com
- Or uploaded onto the ECC website



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## **APPENDIX E – NMP MEDIA STATEMENTS**



Press Release Monday, February 7, 2022

Registration No. 2008/0916

NMP is Progressing the Sandpiper Marine Phosphate Project

Namibian Marine Phosphate (Pty) Limited's ("NMP") is taking the relevant steps to progress the Sandpiper Marine Phosphate Project ("Sandpiper Project") in compliance with the ruling of the High Court on 30 June 2021, which confirmed the ongoing validity of NMP's mining licence ("ML170").

#### ML170 Application for Environmental Clearance Certificate ("ECC")

In accordance with the provisions of the Environmental Management Act, No. 7 of 2007, NMP has appointed an independent Environmental Assessment Practitioner ("EAP") to manage the application and assessment process for the proposed Sandpiper Project within ML170, offshore Namibia.

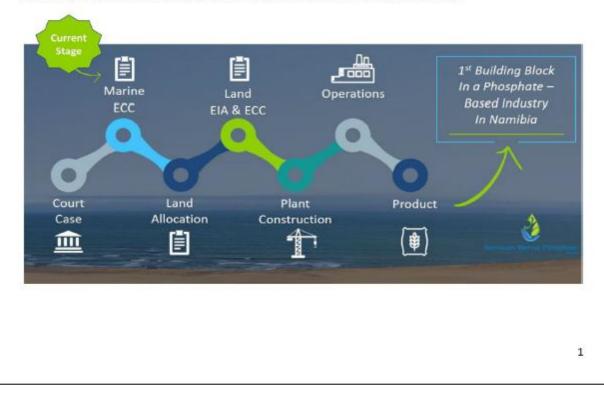
Notice of the application for an ECC for ML170 and details of public meetings for the proposed Sandpiper Project have been published in two newspapers on 27<sup>th</sup> January 2022 and again on 3<sup>rd</sup> February 2022 (see page 3). Public meetings will be held in Windhoek (9<sup>th</sup> February 2022) and Walvis Bay (11<sup>th</sup> February 2022). All stakeholders as well as interested and affected parties ("I&AP's") are encouraged to register their details with the EAP either at the public meetings or online (<u>https://eccenvironmental.com/projects/</u>).

#### Project Employment

The proposed Sandpiper Project will employ over 600 Namibians (directly and indirectly) for construction and operations in Walvis Bay. According to the Chamber of Mines Namibia's 2019 analysis, for every 1 new job created in the mining industry, 7 additional new jobs are created indirectly in the economy, forecasting that Sandpiper Project will create 4,200 jobs.

#### Project Development

The graphic below outlines the progressive project development phases to be completed.





#### from I&APs

Namibian Marine Phosphate (Pty) Ltd

#### Economic Benefits and Jobs for Namibia from a Phosphate-Based Industry

Marine phosphate mining and processing will create new mining operations, such as NMP's Sandpiper Project, and can also provide Namibia with the phosphate concentrate required to develop a fully integrated fertilizer industry that has the potential to make a significant positive contribution to the country's local and national economy in the areas of job creation, poverty eradication, industrialization and government revenue generation.

#### **Misinformation**

A substantial base of scientific data on the proposed Sandpiper Project in ML170 has already been established. However, NMP is aware that a significant amount of misinformation is being circulated in social and other media platforms in relation to the proposed Sandpiper Project, the proponents of phosphate projects, marine phosphate, and also marine or seabed mining in general.

NMP encourages all agencies, stakeholders, I&AP's, and the general public to seek access to verified data, facts, and credible expert opinions on these matters.

More information about the Company and its shareholders as well as the geological, technical, social, and environmental aspects of the proposed Sandpiper Project is available on the Company's website at <u>www.namphos.com</u>.

NMP welcomes the opportunity for constructive engagement with any parties seeking information on the proposed project.

NMP remains fully committed to the responsible commercial, social, and environmental development of the proposed Sandpiper Project for the benefit of all stakeholders, as well as national interests and those of the Namibian public at large.

NMP Management More information is available at NMP's <u>website</u> and <u>Facebook</u>

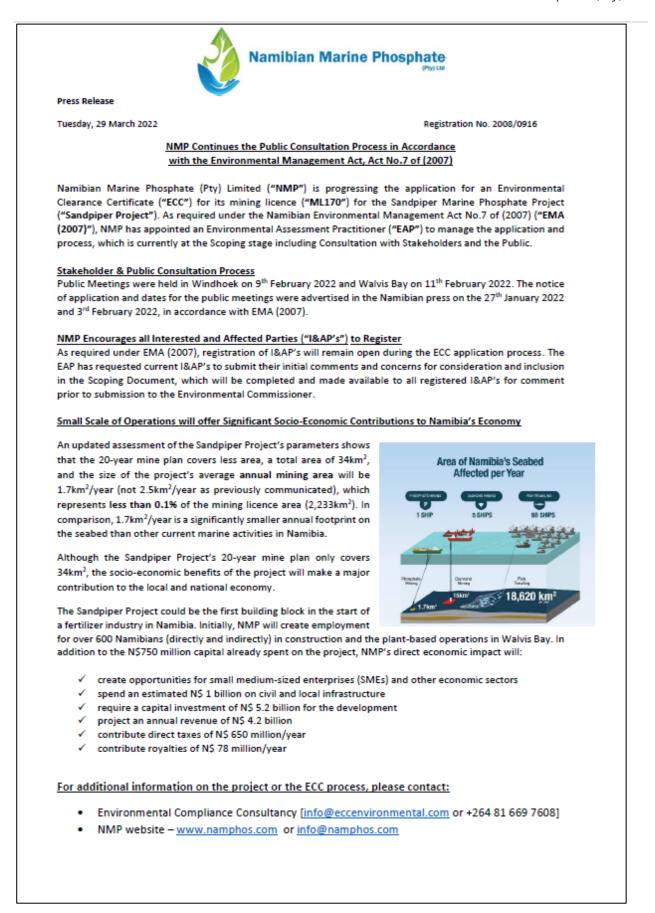
7 Auob Street, Meersig, Walvis Bay, Private Bag 5018 Tel: +264 64 278150 Fax: +264 64 200290 E-mail: info@namphos.com

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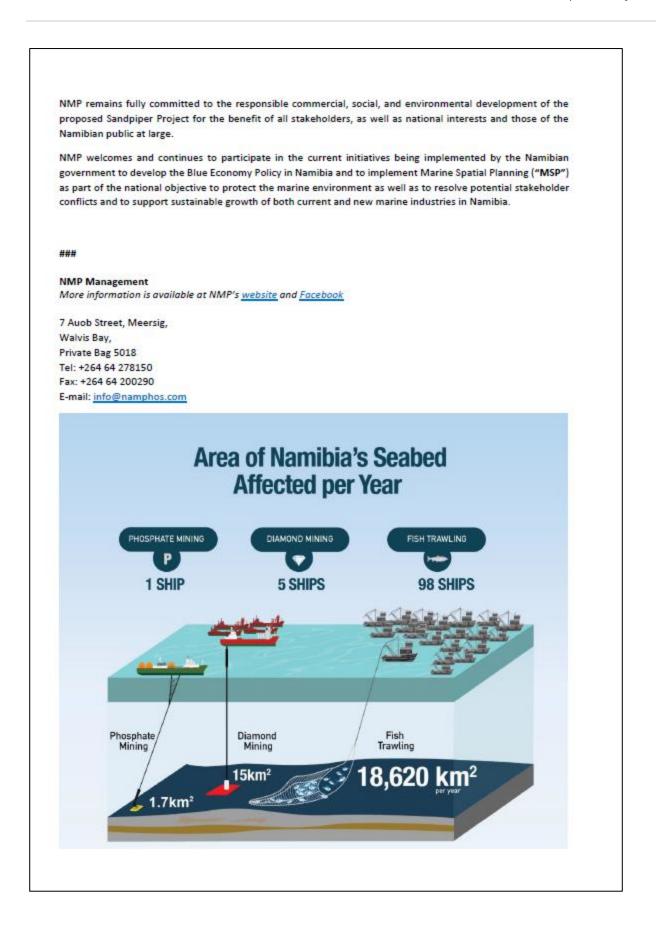


















Namibian Marine Phosphate (Pty) Ltd

Initial environmental baseline and specialist studies relevant to the Project commenced in 2010 and formed part of the 2012 Environmental Impact Assessment ("EIA") conducted for ML170 and the ECC application. Subsequently, a comprehensive 2-year program of *in situ* sampling, data analysis, and specialist studies was completed in 2013/2014 on the primary target dredge site SP-1 in ML170 ("EIA Verification Study").

These specialist studies investigated critical environmental aspects including the potential impacts of noise, toxins, heavy metals, and sediment plumes, along with the impact on mammals, commercial fish species biomass, fish spawning, recruitment and juvenile populations, water quality, and the ecosystem.

The specialist studies and results included in the 2014 EIA Verification Study work program were submitted for review by an External Peer Review Panel of international experts with relevant experience in the Benguela System.

The recommended supplementary specialist studies that were completed in 2020/2021 will be assessed and included in the current ESIA process that is being undertaken by the appointed EAP and will also be made available to the public in due course, in accordance with the provisions of the Environmental Management Act 2007.

All documents related to the ECC application are uploaded as completed and are available to the public at the office of the Environmental Commissioner, the <u>EAP's website</u>, the Department of Environmental Affaires ECC portal, and the company's website (<u>www.namphos.com</u>).

For additional information on the Sandpiper Project or the ECC application process, please contact:

- Environmental Compliance Consultancy [info@eccenvironmental.com or +264 81 669 7608]
- NMP website <u>www.namphos.com</u> or <u>info@namphos.com</u>

NMP remains fully committed to the responsible commercial, social, and environmental development of the proposed Sandpiper Project for the benefit of all stakeholders, as well as national interests and those of the Namibian public at large.

NMP welcomes and continues to participate in the current initiatives being implemented by the Namibian government to develop the Blue Economy Policy ("BEP") in Namibia and to implement Marine Spatial Planning ("MSP") as part of the national objective to protect the marine environment as well as to resolve potential stakeholder conflicts and to support sustainable growth of both current and new marine industries in Namibia.

NMP Management More information is available at NMP's <u>website</u> and <u>Facebook</u>

7 Auob Street, Meersig, Walvis Bay, Private Bag 5018 E-mail: info@namphos.com



# APPENDIX F – PUBLIC MEETING AND FOCUS GROUP MEETINGS ATTENDANCE REGISTERS

Pre-consultation meeting attendance list with Walvis Bay Salt Holdings (WBSH) held on the 4 February 2022 at 10:00.

Organisation	Name
Walvis Bay Salt Holdings (WBSH)	Andre Snyman
Walvis Bay Salt Holdings (WBSH)	Klaus Friedlingsdorf
Walvis Bay Salt Holdings (WBSH)	Thadeus Kasera
Namibia Marine Phosphate (NMP)	Chris Jordinson
Namibia Marine Phosphate (NMP)	Mike Woodborne
Environmental Compliance Consultancy (ECC)	Jessica Bezuidenhout
Environmental Compliance Consultancy (ECC)	Carlene Baufeldt
Environmental Compliance Consultancy (ECC)	Monique Jarrett



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	1 TZG	4010051214			
	eeting Attendance Register				Date: 09/02
M	eeting Subject: - Sand pro	ier Marine 9	hasphate Mining		1
	enue: Namibia	Scientific i	Society		
	NAME	ORGANIZATION	EMALLADDRESS	CONTACT NUMBER	SIGNATURE
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/enu	e: Namibia Sc	ventifi Se	riefy )		
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1 /	David Russell	Confed Nanib. Forty Assoc	daveline iway na	081-7205082	WR.
2 //	Dalpre alpson	OASONA HESSE	deb-rol@iway.nr	081 2413089	ana.
3/1	Dunly	Private	-	081424 9286	hur
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#### related comments from I&APs

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#### related comments from I&APs

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	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	La-Taga Shivit	MPMR	latayosh, un le om forgarna	082282784	Be
2	P.Kainse	MAMR	Paulus. Koiing Omfor gru		PKraung
	- 11 .		John. Kathen @ neferr.gor-		Allera
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4 5 6 7	Moxes Kalola Secilia T. Shilongo Tosephire Edward Anja van der Plas	MAMIR 100 FMR MFMR MFMR	mkalola @mfmi.gov.na seciliats@grail.com Josephine.toward@mfm.gov.na	0812532/93 0814072050 0817530993 0812421891	Adda Advent A. Weur



#### related comments from I&APs

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	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	F. Hipompolea	Public		0213998075	10-
2	I Kotze	Namibion Dolp	this	081 3128967	Al-
3	Cantyn M. Hax K.	Namiban Dolphin		+ 204 81 687 6461	Le
4	LEANNANT Iquila	211.	lisinson 799 QqMail.com	08869038	the contraction of the contracti
5	Mausslf Flina Ja	. 1	elisabeth masso 40312	de 081-1226881	GHI
6	Maria Amunyela		Maria amunyeloggiz de	0817230255	A
7	Karlysh Hykyete		Karlyshhyknete@gmail.com		HAR
8	Nangula Amatsi				- MD-
9	T.T.	NFS	namutenya Ewalvi	0812125290	B
10	MARIN	f runus	MARVIN MULTUNGA Symple	a 0814638210	M
11	Getan Unab	NUBC	stefanmenroe 3@gmail (0		H >-
12	Martin Stefanus	NBC			-1/



#### related comments from I&APs

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	+2648			COMPLIANCE CONSULTA	NGY
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	ing Attendance Register ing Subject: <u>- Sava pip</u> e	r Marine	Phasphate Mining		
	ie: Walvisbay	Town Ha	II		
		ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
<sup>1</sup> ij	Johannes M	MARITIMEAFFAIF	s Johannes. Muranima multipo	m Rillpashty	J.m. Zaomina
2	L KASHEETA	GIZ- MARUMA	linda, Kashela e giz.de	0811599871	AG 1.
3	a Hartman	nmB	adam @ eronyo. com. na	08/2505966 .	MA
4	HAFEN SHAN	Withund		0713980602	St
5	H. Scheepee	NMP	hamelie, scheepes Ona-phos. can Menezalenamphis.com	085580013	Actor
6	M. Jao-Es	NMP	Menezalenam phos. com	0 8588000 14	Mttoveis
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8	U. Hockels	UHC	usiQuác.com.na	0814240935	Alfall
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11	Malcolin Hoelses	CHC	commo a uhc. com na	0812663089	si



#### related comments from I&APs

	info@eccenvironmental.com www.eccenvironmental.com +264812627872 +264816531214					
Vleeti	ing Attendance Register ing Subject: - Savapipa e: Walvis Bary	or Marine	physphete Mining		Date: (1 02 2027	
/enu	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE	
1	Evelone delcu	NEW EX	evoleedk@gmail.com	0812179739	ER	
2			epaperongo.co.za	0851229177	Jelly	
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#### related comments from I&APs

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/leeti	ing Attendance Register				Date: 11 / 02 / 2022
/leeti	ing Subject: Sandalas	r Marine	philling Mining		_ /
/enu	1e: Halvisbay	Town Ho	A'		
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Pamela Nauses	Public	prayees@gmail.com	08120120 59	Alley.
2	A_ ANDRY	OCN	ANTOINE@ OCNATUBIA. ORF	081 327 6834	4
3	N. Dreyer	OCN	into co o chamibia. c-a	0111617377	Alex
4	B. CURRIE	welependent	currie 32@gmail.cou		Aline .
5	R. BRABY	<i><b>412</b></i>	rodney.braby egie.de	0811473518	R
6	A. Furbit	Puplic	"ASame"	08112953-20	122
7	King Manduke Muching	Public	Kingmandumen Eyakos Com	0813443716	The 21
8	Jak Schweider	WI	direbarantonorania w	181-2945510	
9	Maugulu	Public	a long canga lo Phohused.	ion pMZ115532	nt
10	Martin	NBC.	inskephanus Onbina	088796489	A.
11	Ester	Nampa	e bruix mena Ogmaila	092924195	Solt



## **APPENDIX G – SITE NOTICES**

#### Swakopmund Municipality



#### Swakopmund COSDEF Community Centre





#### Walvis Bay Municipality



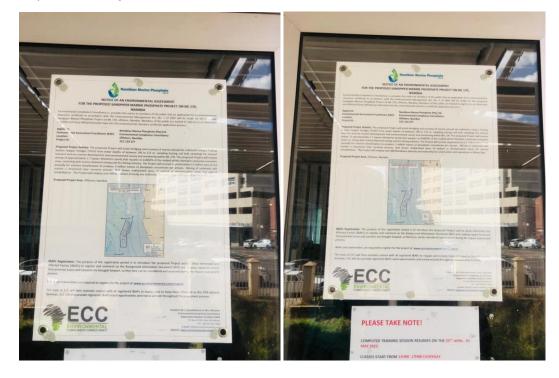
Walvis Bay Town Hall



Namibian Marine Phosphate (Pty) Ltd

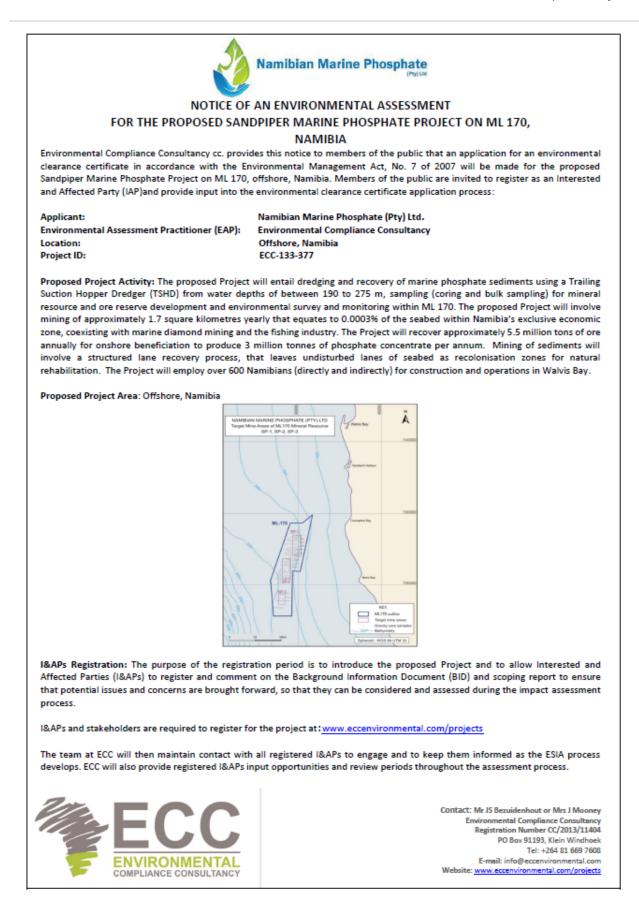


Windhoek public Library





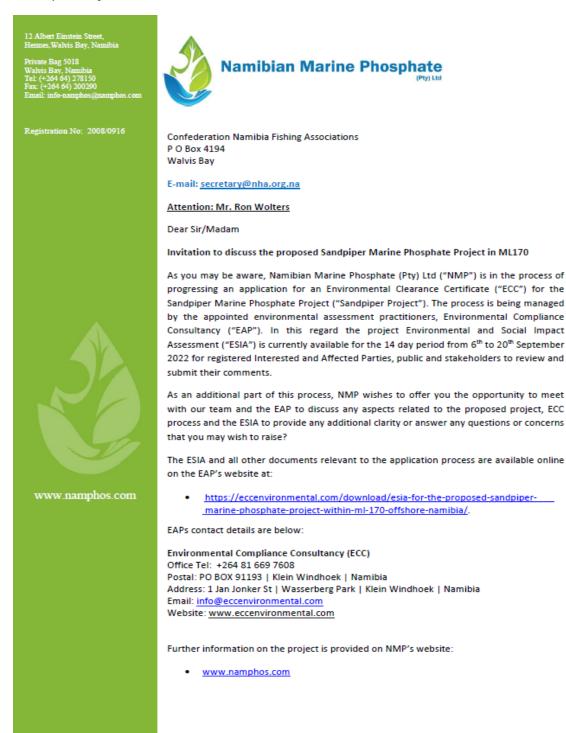
from I&APs



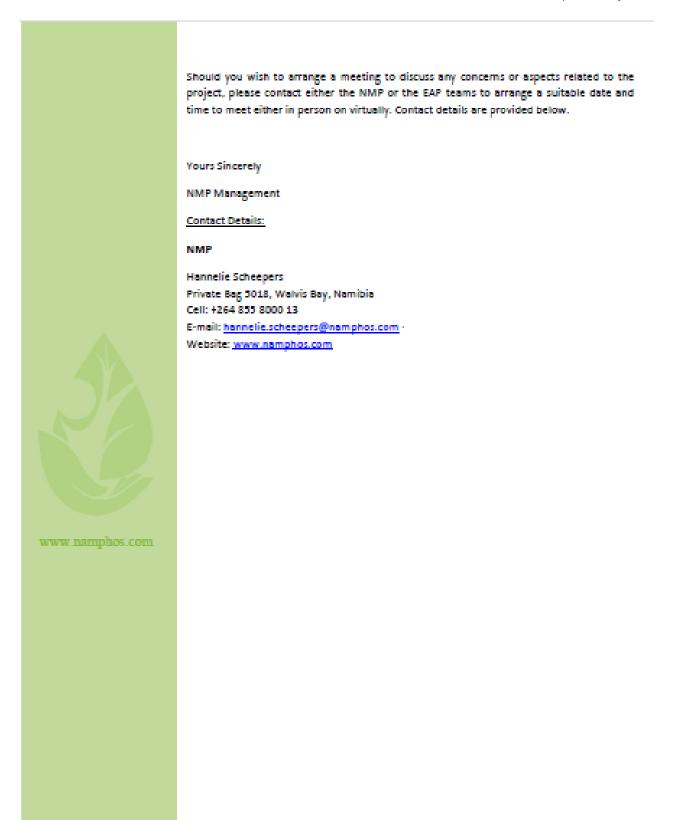


# APPENDIX H – EAP EMAIL AND NMP LETTER TO STAKEHOLDERS AND I&APS

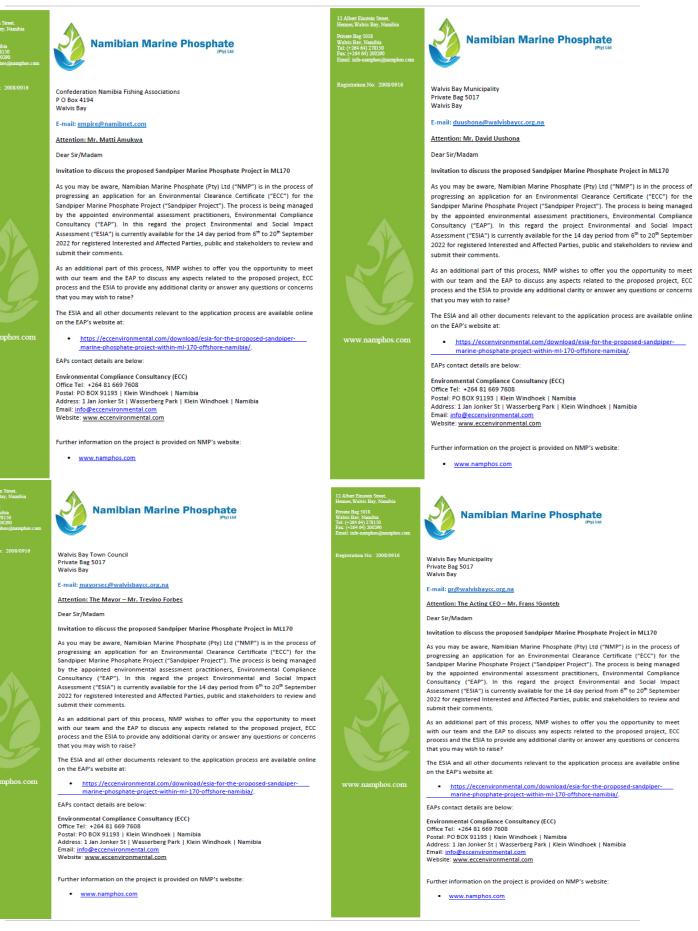
Copies of the proof of email correspondence of the letters submitted can be requested from the EAP separately.





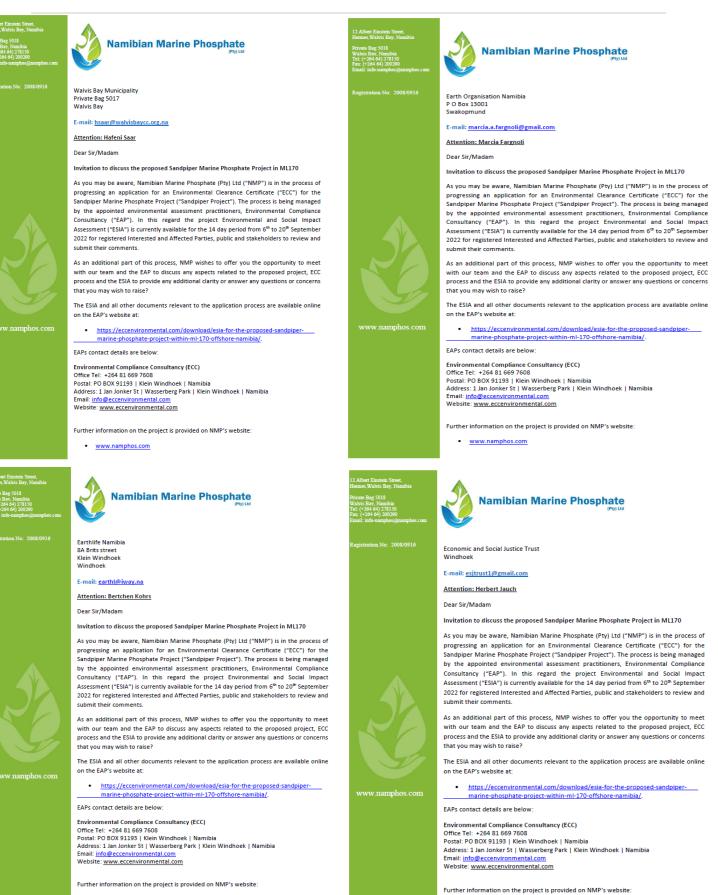








Namibian Marine Phosphate (Pty) Ltd



www.namphos.com

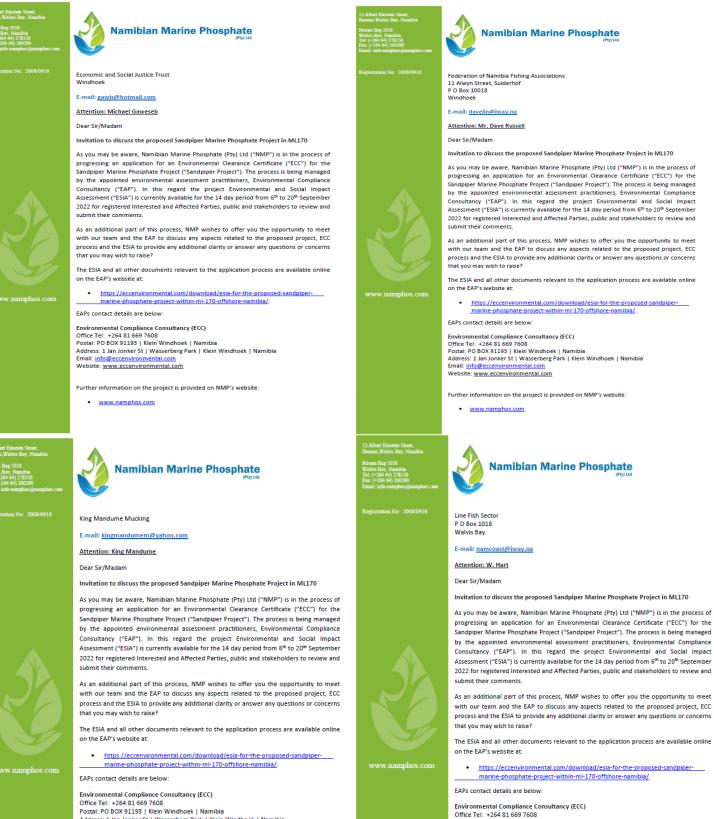
31 OCTOBER 2022

REV 03 ECC Report №: ECC-133-377-REP-17-D PAGE 111 OF 154

www.namphos.com



Namibian Marine Phosphate (Pty) Ltd



Christenie - Schlander Consultance (CCC) Office Tei - Schlander Schlander (ECC) Postal: PO BOX 91193 | Klein Windhoek | Namibia Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: <u>info@eccenvironmental.com</u> Website: <u>www.eccenvironmental.com</u>

Further information on the project is provided on NMP's website:

www.namphos.com

31 OCTOBER 2022

REV 03 ECC Report Nº: ECC-133-377-REP-17-D PAGE 112 OF 154

Postal: PO BOX 91193 | Klein Windhoek | Namibia

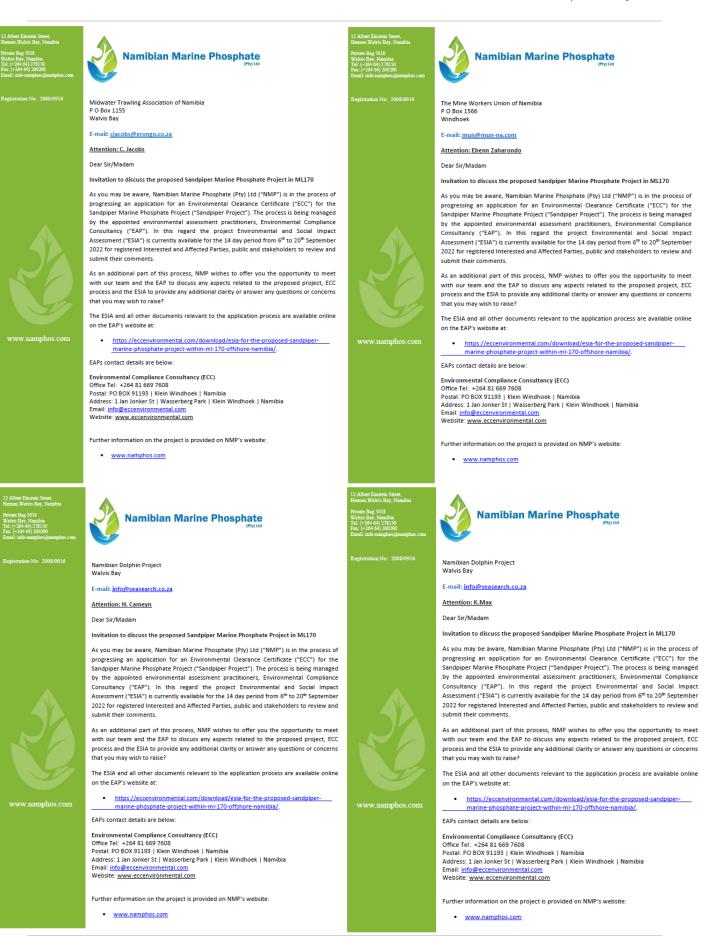
Email: info@eccenvironmental.com Website: www.eccenvironmental.com

www.namphos.com

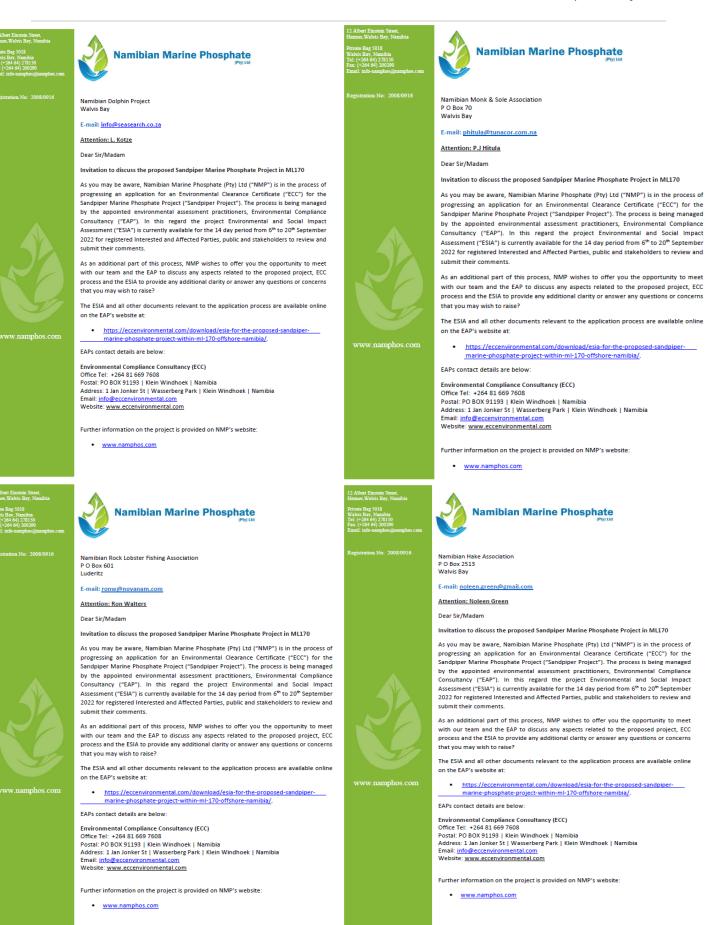
Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia

Further information on the project is provided on NMP's website:

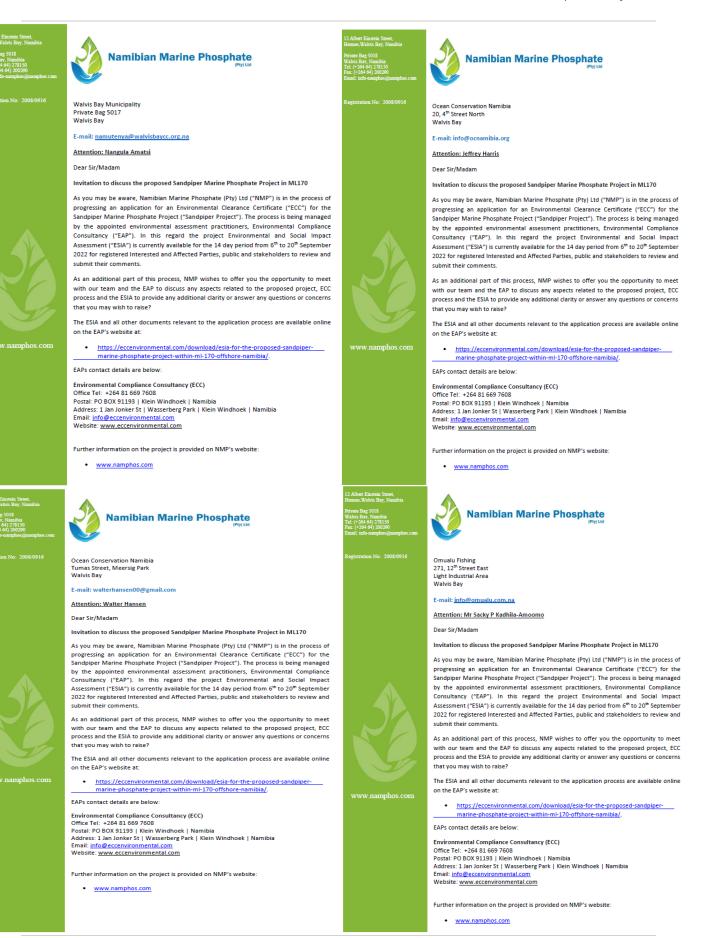














Namibian Marine Phosphate (Pty) Ltd

#### 2 Albert Einstein Street, Iermes,Walvis Bay, Namibia Private Bag 5018

vivate Bag 5018 Valvis Bay, Namibia Fel: (+264 64) 278150 au: (+264 64) 200290 Email: info-namphos@namphos.com Namibian Marine Phosphate

Sea Search: Namibian Dolphin Project Walvis Bay

#### E-mail: info@seasearch.co.za

#### Dear Sir/Madam

Invitation to discuss the proposed Sandpiper Marine Phosphate Project in ML170

As you may be aware, Namibian Marine Phosphate (Pty) Ltd ("NMP") is in the process of progressing an application for an Environmental Clearance Certificate ("ECC") for the Sandpiper Marine Phosphate Project ("Sandpiper Project"). The process is being managed by the appointed environmental assessment practitioners, Environmental Compliance Consultancy ("EAP"). In this regard the project Environmental and Social Impact Assessment ("ESIA") is currently available for the 14 day period from 6<sup>th</sup> to 20<sup>th</sup> September 2022 for registered Interested and Affected Parties, public and stakeholders to review and submit their comments.

As an additional part of this process, NMP wishes to offer you the opportunity to meet with our team and the EAP to discuss any aspects related to the proposed project, ECC process and the ESIA to provide any additional clarity or answer any questions or concerns that you may wish to raise?

The ESIA and all other documents relevant to the application process are available online on the EAP's website at:

 https://eccenvironmental.com/download/esia-for-the-proposed-sandpipermarine-phosphate-project-within-mi-170-offshore-namibia/.

#### EAPs contact details are below:

Environmental Compliance Consultancy (ECC) Office Tel: +264 81 669 7608 Postal: PO BO3193 | Klein Windhoek | Namibia Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: <u>info@eccenvironmental.com</u> Website: <u>www.eccenvironmental.com</u>

Further information on the project is provided on NMP's website

#### www.namphos.com

Should you wish to arrange a meeting to discuss any concerns or aspects related to the project, please contact either the NMP or the EAP teams to arrange a suitable date and time to meet either in person on virtually. Contact details are provided below.



# Namibian Marine Phosphate

Swakpmund Town Council P O Box 53 Swakopmund

#### E-mail: swkmun@swkmun.com.na

Attention: The Mayor - LN Kativa

#### Dear Sir/Madam

Invitation to discuss the proposed Sandpiper Marine Phosphate Project in ML170

As you may be aware, Namibian Marine Phosphate (Pty) Ltd ("NMP") is in the process of progressing an application for an Environmental Clearance Certificate ("ECC") for the Sandpiper Marine Phosphate Project ("Sandpiper Project"). The process is being managed by the appointed environmental assessment practitioners, Environmental Compliance Consultancy ("EAP"). In this regard the project Environmental and Social Impact Assessment ("ESIA") is currently available for the 14 day period from 6<sup>th</sup> to 20<sup>th</sup> September 2022 for registered Interested and Affected Parties, public and stakeholders to review and submit their comments.

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 <u>https://eccenvironmental.com/download/esia-for-the-proposed-sandpiper-</u> marine-phosphate-project-within-ml-170-offshore-namibia/.

#### EAPs contact details are below

Environmental Compliance Consultancy (ECC) Office Tel: +264 81 669 7608 Postal: PO BOX 91193 | Klein Windhoek | Namibia Address: 1 lan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: Info@eccenvironmental.com Website: www.eccenvironmental.com

Further information on the project is provided on NMP's website:

www.namphos.com





Sea Works Fish Processors (PTY) Ltd 58 Ben Amathila Avenue Walvis Ray

#### E-mail: info@seawork.com.na

Attention: Mr C.W. Mette & Mr. Peter H. Pahl

Dear Sir/Madam

Invitation to discuss the proposed Sandpiper Marine Phosphate Project in ML170

As you may be aware, Namibian Marine Phosphate (Pty) Ltd ("NMP") is in the process of progressing an application for an Environmental Clearance Certificate ("ECC") for the Sandpiper Marine Phosphate Project ("Sandpiper Project"). The process is being managed by the appointed environmental assessment practitioners, Environmental Compliance Consultancy ("EAP"). In this regard the project Environmental and Social Impact Assessment ("ESIA") is currently available for the 14 day period from 6" to 20" September 2022 for registered Interested and Affected Parties, public and stakeholders to review and submit their comments.

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 <u>https://eccenvironmental.com/download/esia-for-the-proposed-sandpiper-</u> marine-phosphate-project-within-ml-170-offshore-namibia/.

EAPs contact details are below:

Environmental Compliance Consultancy (ECC) Office Tel: - 264 81 669 7608 Postal: PO BOX 91193 | Klein Windhoek | Namibia Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: <u>info@eccenvironmental.com</u> Website: <u>www.eccenvironmental.com</u>

Further information on the project is provided on NMP's website:

www.namphos.com



Swakpmund Municipality P O Box 53 Swakopmund

E-mail: swkmun@swkmun.com.na

#### Attention: The CEO – A Benjamin

Dear Sir/Madam

Invitation to discuss the proposed Sandpiper Marine Phosphate Project in ML170

As you may be aware, Namibian Marine Phosphate (Pty) Ltd ("NMP") is in the process of progressing an application for an Environmental Clearance Certificate ("ECC") for the Sandpiper Marine Phosphate Project ("Sandpiper Project"). The process is being managed by the appointed environmental assessment practitioners, Environmental Compliance Consultancy ("EAP"). In this regard the project Environmental and Social Impact Assessment ("ESIA") is currently available for the 14 day period from 6<sup>th</sup> to 20<sup>th</sup> September 2022 for registered Interested and Affected Parties, public and stakeholders to review and submit their comments.

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- EAPs contact details are below:

Environmental Compliance Consultancy (ECC) Office Tel: +264 81 669 7608 Postal: PO 80X 91193 | Klein Windhoek | Namibia Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: <u>info@eccenvironmental.com</u> Website: <u>www.eccenvironmental.com</u>

Further information on the project is provided on NMP's website:

www.namphos.com





Namibian Marine Phosphate (Pty) Ltd

12 Albert Einstein Street, Hermes,Walvis Bay, Namibi

Private Bag 5018 Walvis Bay, Namibia Tel: (+264 64) 278150 Fax: (+264 64) 200290 Email: info-namphos@namphos.com

Registration No: 2008/0916



Namibian Marine Phosphate

Wet Landed Horse Mackerel Association (WLHMA) 98 Ben Amathila Avenue P O Box 21001 Walvis Bay

E-mail: Jason.angala@princess-brands.com

Attention: Jason Angala

Dear Sir/Madam

Invitation to discuss the proposed Sandpiper Marine Phosphate Project in ML170

As you may be aware, Namibian Marine Phosphate (Pty) Ltd ("NMP") is in the process of progressing an application for an Environmental Clearance Certificate ("ECC") for the Sandpiper Marine Phosphate Project ("Sandpiper Project"). The process is being managed by the appointed environmental assessment practitioners, Environmental Compliance Consultancy ("EAP"). In this regard the project Environmental and Social Impact Assessment ("ESIA") is currently available for the 14 day period from 6<sup>th</sup> to 20<sup>th</sup> September 2022 for registered Interested and Affected Parties, public and stakeholders to review and submit their comments.

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<u>https://eccenvironmental.com/download/esia-for-the-proposed-sandpiper-marine-phosphate-project-within-ml-170-offshore-namibia/</u>.

EAPs contact details are below:

Environmental Compliance Consultancy (ECC) Office Tel: +264 81 669 7608 Postal: PO BOX 91193 | Klein Windhoek | Namibia Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: <u>info@eccenvironmental.com</u> Website: <u>www.eccenvironmental.com</u>

Further information on the project is provided on NMP's website:

<u>www.namphos.com</u>

www.namphos.com



# APPENDIX I – NMP-ECC COMMUNITY ENGAGEMENT INFORMATION BOOKLETS















Namibian Marine Phosphate (Pty) Ltd



18,620 km<sup>2</sup>

Om ukalogoku helula:











Namibian Marine Phosphate (Pty) Ltd

## Apopa mapa ra sâuhe?



- IÎ-ī ge hūrib!nâao ‡gāhe tamai, tsî!hūbaihāra ✤ |Gaisatsî‡orisas@msa
  - Nēsâu!khaiggelgaisatsî

# Ō phosphate-e khaokhâis xa ra !aromahe |urixasib?



## Nē projects sa mâ domdorede ūhâ?



- Sosiale domdores
- ٠ Marisi domdores

## Gangans

IKhami da re: llÂllapap: +264 81 669 7608 info@eccenvironmental.com





www.eccenvironmental.com





31 OCTOBER 2022

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Namibian Marine Phosphate (Pty) Ltd

Information booklets distributed at the Walvis Bay Municipality Civic Centre (28 October 2022)





## related comments from I&APs

Namibian Marine Phosphate (Pty) Ltd

# **APPENDIX J – RECORDS OF PARTICIPATION ADDITONAL ENGAGEMENT**

	Fishing Industry				Email sent	Phone call 13.9.2022	email post phone call	Feedback received	Comment	2nd Follow-up phone call	Submitted	comment been to the comment been to the comment been to the comment of the comment been to the comment been tot the comment been to the comment been to the comment be
		rishing industry			Email Sent	Phone call 13.5.2022	phone can	reedback received			Submitted	i responded (d
CNFA - Confederation			1						try alternate email and phone no's	Mr Amukwa refused answered the		
Namibia Fishing	Matti Amukwa	empire@namibnet.com	064 - 205595							phone call but refused to engage		
Associations		A CONTRACTOR OF A CONTRACT OF A CONTRACT.	1							with us to answer whether or not he		
			1	PO Box 4194 Walvis Bay	Yes 13.9.2022	No answer				had received the email	YES	YES
		mailto:matti@empirefishing.com.na	061 255316								NO	NO
	Mr Sacky P Kadhila-			Ornalu Fishing						1		
	Amoomo,		1	271, 12th Street East						1		
			1	Light Industrial Area						1		
Omalu Fishing		info@umalo.com.na	+26464209998	Valvis Bau	Yes13.9.2022 and 11.10.2022	call failed				1	NO	NO
Secretary	Ron Volters	secretaru@nha.org.na	0811244527		Yes 13.9.2022	Went to voice mail					NO	NO
Federation of Namibia	David Russell	davelin@iwau.na	0817205082	11 Alwyn Street, Suiderhof,	100.0.2022	went to voice man			2020 Technical Reports have not been released to any parites, they		NO	140
Fishing Associations	David Hussell	<u>Marannew Waying</u>	0017203002	Windhoek 10018, Namibia					were provided directly to the EC only at that time in 2020 as the then	1		
Fishing Associations			1	Windhoek IUUIS, Namibia				Thank you for the attached undated letter from Namibian Marine Resources		1		1
			1					(NMP) inviting the opportunity to consult to clear up any concerns.	current application was formally suspended by the MEFT pending	1		
			1						the outcome of the legal proceedings initiated by CNFA. In June	1		
			1					Three months ago we asked if we could obtain the 2020 technical reports on	2021 t High Court court ruled that the then current application was	1		
			1					plume modelling, sediment toxicity and noise impacts etc., that NMP had	invalid and instructed that NMP should apply in the prescribed	1		
			1					commissioned as far back as 2020, as responses to gaps in the original EIA. We	manner for an environmental clearance certificate. These technical	1		
			1						reports now form part of the current application process undertaken	1		
			1					did those, so that we could circulate them to international experts with the	in compliance with the order of the High Court and have been	1		1 1
			1					necessary expertise to assess these documents. However we were told that "the	makde available to all parties at the same time, without peference,	1		
			1					reports form part of the current assessment process and will be circulated to all		1		
			1					registered IAPs in due course, in accordance with the regulations".	as part of the processes as defined in EMA2007. This access	1		
			1						included Dr Chris Brown and NCE who have not been granted any	1		
			1					We are concerned by newspaper articles this year, where environmental scientist	preferential or prior access to these reports. The documents	1		
			1					Dr. Chris Brown states that he has reviewed all NMP's documents, and at the	referred to by Dr Chris Brown relate to the 2012 EIA and 2014 EIA	1		
			1					time IAPs such as ourselves had been denied access to these crucial	Verification Study Reports all of which were made available to	1		
			1						registered interested and affected parties as part of the precous	1		
			1					documents, while there was time to get them properly reviewed through a	application process and again in 2018 in the public conslutation	1		
			1					transparent process.	process run by the Environmental Commissioner, which included	1		
			1							1		
			1					The international experts who have the expertise to asses these documents are	the CNFA. IAP's have therfore notbeen denied access to the 2020	1		
			1					very busy people, and cannot be expected to do a proper review of these	Technical reports. All reports have been provided to the registered	1		
			1					documents with a deadline of two weeks. Consequently we are not in a position	I&APs in accordance with the prescribed process for the present	1		
			1					to consult with NMP without these expert opinions.	application, including to the CNFA. The period provided for	1		
			1						comment by I&APs iof 14 days was defined in consultation with the	1		
			1					Instead our time needs to be devoted to reviewing the many documents supplied	office of the Environmental Commissioner, and is in accordance	1		
			1						with bot the Act and reasonable allocation of time for comment on	1		
			1					for reviewing as part of the current ESIA process, given the tight deadline of 20th	the content of the Assessment Report prior to submission to the	1		
			1					September, which in reality to get a good response from IAPs, including those of	EC as required under Regulation 23 of the Act.	1		
			L		Yes 13.9.2022	Received	sent	international expert scientists, should be three months.	EC as required under Regulation 23 of the Adt.	I	YES	YES
Namibian large Pelagic &	M Schwieger	max@corvima.com.na	00264 64-205610							called '+264811244527 went straight		
Hake longlining Association	IVI Schwieger	maxie/corvina.com.na	00204 04-205010	PO Box 3427 Walvis Bay	Yes 13.9.2022	Phone call received		Told to contact Tunacor		to voicemail	NO	NO
Midwater Trawling										no answer		
Association of Namibia	C Jacobs	cjacobs@erongo.co.za	00264 64 219 200	PO Box 1155 Walvis Bay	Yes 13.9.2022	Phone call received		Told to call back to speak to secretary		1	NO	NO
Namibian Monk & Sole								secretary (Noleen Green )answered and told me to send a follow up email with		1		
Association	P J Hitula	phitula@tunacor.com.na	00264 64 218 100	PO Box 70 Walvis Bay	Yes 13.9.2022	Phone call received	sent	regards to our call		1	NO	NO
Pelagic Fishing Association				· · · · · ·					info supplied by the participant is incorrect then	call failed		
of Namibia	W Pronk	angela.kriel@ufefish.com	00264 64 217 500	PO Box 63 Walvis Bau	Yes 13.9.2022	call failed			une seletere eftere bergehende uponteet men		NO	NO
	Secretary				103 10.0.2022	- Con range		+	ł		1.0	1.00
Namibian Hake Association	N Green	noleen.green@gmail.com	00264 64 218 100	PO Box 2513 Walvis Bau	Yes 13.9.2022	Received	sent			1	NO	NO
Namibian Mariculture			00264 64 219 900	1					info supplied by the participant is incorrect then	call failed		
Namibian Mariculture Association	H Du Plessis	Henning.du.Plessis@namsov.com.na	00264 64 213 300	PO Box 4 Walvis Bau	Yes 13.9.2022	need to find new contact detail			and supplied by the participant is inconnect them	Contrained	NO	NO
					1 es 13.3.2022	need to find new contact detail		+		call failed	NO	NU
Deepwater Fishing	R Walters	ronw@novanam.com	00264 63 202 891						info supplied by the participant is incorrect then	call failed		
Association of Namibia				PO Box 601 Luderitz	Yes 13.9.2022	call failed				l	NO	NO
Namibian Rock lobster	B Walters	ronw@novanam.com	00264 64 202 891		1				info supplied by the participant is incorrect then	call failed	1	1
Fishing Association		100WWWWWWWWWWWW		PO Box 601 Luderitz	Yes 13.9.2022	call failed				1	NO	NO
Line Fish Sector	W Hart	namcoast@iway.na	00264 64 204 786	PO Box 1018 Walvis Bay	Yes 13.9.2022	Went to voice mail				No answer	NO	NO
	Jason Angala	son.angala@princess-brands.co	+264 64 285 000	98, Ben Amathila Avenue,	1	1		1	noted.	(		
		and an approve processes and the ex-	1	Valvis Bay 21001, Namibia	1	1	1			1	1	1
			1	a sano bay ziron, reamibla	1	1	1	Thank you for your email dd 13 September 2022 and "undated" letter attached.		1	1	1
Wet Landed Horse Mackerel			1		1	1	1			1	1	1
Association (WLHMA)			1		1		1	Please note that the Wet Landed Horse Mackerel Association forms part of the		1	1	
			1		1		1	CNFA and we have to consult at our earliest convenience as our response will		1	1	
			I		Yes 13.9.2022	Received	sent	be made jointly			NO	NO
Sea Works Fish	Mr C.V. Mette and Mr	info@seawork.com.na	+264 64 212 600	58 Ben Arnathila Avenue								
oea works hish											NO	NO



## Summary of the public consultation process, public and stakeholder meetings and

## related comments from I&APs

										1		
Local Authorities	Antin - CEO										NO	NO
Walvie Bay Municipal's	Acting CEO Frans !Gonteb	nr@ualuichause are ea	00264 64 201 3111			1						1
Walvis Bay Municipality	Frans !Gonteb David Nuush	pr@walvisbaycc.org.na	00264 64 201 3111	Private Bag 5017 Walvis Bay	Yes 13.9.2022	no answer					NO	NO
	David Nudsii			Filvate bag 5017 walvis bay	103 13.3.2022	no unswer					10	NO
						1						1
						1		Dear Hannelie Scheepers – This is to acknowledged receipt of your attached undated-				1
1				1				Dear Hannelle Scheepers – This is to acknowledged receipt of your attached undated- unsigned letter today.				1
								unsigned letter today.				
								Dear Councilors & Colleagues - Please take note of the email and attachment. You are				
								more than welcome to request for a collective or individual presentation/engagement				
								from the EAP.				
								Dear Nangula & Lovisa – Please share with WEMAF as always.				
	David Uushona											
WB Municipality	leticia Kahona	duushona@walvisbaycc.org.na	0811220814		Yes 13.9.2022	no answer	sent	Kindest regards & blessings to you,			NO	NO
									info supplied by the participant is incorrect then			
WB Municipality	Hafeni Saar		0813980602		Yes 13.9.2022	Number does not exsist					NO	NO
WB Municipality	Nangula Amatsi	namutenya@walvisbaycc.org.na			Yes 13.9.2022	Received	sent				NO	NO
									info supplied by the participant is incorrect then			
WB Municipality	Hafeni Saar		813980602		Yes 13.9.2022	Number does not exsist					NO	NO
	Mayor											
Walvis Bay Town Council	Trevino Forbes	mayorsec@walvisbaycc.org.na	00264 64 201 3268	Private Bag 5017 Walvis Bay	Yes 13.9.2022	lcoetzee@walvisbaycc.org.na					NO	NO
Swakopmund Municipality	CEO	swkmun@swkmun.com.na										
swakopmunu wumcipality	A Benjamin	sakinung sakinun com na	081 706 3844	PO Box 53 Swakopmund	Yes 13.9.2022	Received	sent				NO	NO
Swakopmund Town Council	Mayor	swkmun@swkmun.com.na	081 140 3086						try mayors official office number			
Shakopinana tolini council	LN Kativa	<u>swanding swanding on the</u>	001 140 5000	PO Box 53 Swakopmund	Yes 13.9.2022	number not reachable					NO	NO
					Yes 13.9.2022						NO	NO
Unions											NO	NO
The Mine Workers Union of	Ebenn Zaharondo	mun@mun-na.com	00264 61 261 723/215 629									
Namibia	EDENII Zanaronuo	manemanna.com	00204 01 201 723/213 023	PO Box 1566 Windhoek	Yes 13.9.2022	Received	sent				NO	NO
ESJT											NO	NO
Economic and Social Justice	Herbert Jauch	anita att Qamail ana	0811243438	Windhoek, Namibia					message left?	Goes straight to voice mail		
Trust		esitrust1@gmail.com		WITUTOEK, Nattibia	Yes 13.9.2022	went to voicemail			*	· ·	YES	YES
Economic and Social Justice	Michael Gaweseb	gawis@hotmail.com	0856205453						info supplied by participant is incorrect then, check registe			
Trust												NO
Trust					Yes 13.9.2022	call failed		r			NO	NO
Local Leaders					Yes 13.9.2022	call tailed		r			NO	NO
					Yes 13.9.2022	call tailed		r	Call again, important contact. Enagaged in additional WVB community			NO
	King Mandume Mucking	kingmandumem@yahoo.com	0813443716		Yes 13.9.2022 Yes 13.9.2022	call failed			Call again, important contact. Enagaged in additional WVB community meeting.			NO NO NO
	King Mandume Mucking	kingmandumem@yahoo.com	0813443716								NO	NO NO
	King Mandume Mucking	kingmandumem@yahoo.com	0813443716								NO	NO NO NO
Local Leaders	King Mandume Mucking	kingmandumem@yahoo.com	0813443716							will call back to confirm receipt of	NO	NO NO
Local Leaders NGO's Sea Search: Nam Dolphin Proj	King Mandume Mucking	kingmandumem@yahoo.com info@seasearch.co.za	0813443716			went to voicemail			meeting.	will call back to confirm receipt of email and letter	NO	
Local Leaders	King Mandume Mucking	kingmandumem@yahoo.com info@seasearch.co.za	0813443716		Yes 13.9.2022	went to voicemail				will call back to confirm receipt of email and letter will call back to confirm receipt of	NO	
Local Leaders NGO's Sea Search: Nam Dolphin Proj	King Mandume Mucking	kingmandumem@yahoo.com info@seasearch.co.ra	0813443716		Yes 13.9.2022 Yes 13.9.2022	went to voicemail	e		meeting.	will call back to confirm receipt of email and letter	NO	
Local Leaders NGO's Sea Search: Nam Dolphin Proj	I. Kotze	kingmandumem@yahoo.com Info@seasearch.co.za	813128967		Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	e		meeting.	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of	NO	NO NO NO NO NO
Local Leaders NGO's Sea Search: Nam Dolphin Proj Namibian Doplhin Project	I. Kotze	kingmandumem@yahoo.com info@seasearch.co.za			Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	e		meeting.	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO NO NO NO NO
Local Leaders NGO's Sea Search: Nam Dolphin Proj Namibian Doplhin Project Namibian Doplhin Project	I. Kotze	kingmandumem@yahoo.com info@seasearch.co.za earchu8ixoov.na.	813128967 816876461	BA Britstreet, Klein	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	e		meeting. follow up? call mobile to inform	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of	NO	NO NO NO
Local Leaders NGO's Sea Search: Nam Dolphin Proj Namibian Dopihin Project Namibian Dopihin Project	I. Kotze h. Cameyn K. Max	info@seasearch.co.za	813128967 816876461 816876461	Windhoek, Windhoek	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	e		meeting. follow up? call mobile to Inform call mobile to Inform	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Local Leaders NGO's Sea Search: Nam Dolphin Proj Namibian Dopihin Project Namibian Dopihin Project	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the			meeting. follow up? call mobile to inform call mobile to inform follow up? This commuliction is a follow up to the email already sent on 5th	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Looi Leaders 1900's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthlife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek, Windhoek 9000, Namibia	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the		f	meeting. follow up? call mobile to inform call mobile to inform follow up? This communiction is a follow up to the email already sent on 5th September to all registered I&Aps which included Earth Organisation	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Looi Leaders 1900's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthlife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	-         -	f	meeting. follow up? call mobile to inform call mobile to inform call mobile to inform follow up? This communication is a follow up to the email already sent on 5th spermohr to all registered I&App which included Earth Organisation Namibia. As such full notice period of 14 days has previously been advised. Deportunity to comment in writing has been offered as part of the organisation	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Lood Leaders NGO's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the		Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this	meeting.  follow up? call mobile to inform call mobile to inform follow up? This commutiction is a follow up to the email already sent on 5th September to all registered I&Aps which included Earth Organisation This commutiction is a follow up to the email already sent on 5th Gaportunity to comment in writing has been offered as part of the original mail sent to all Raps on 5 Septemer 2022, the coremer stated in your	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Looi Leaders 1900's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthlife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	Image: Control of the second	Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this invitation only this week when comments are due early next week, I do not have time to	meeting. follow up? call mobile to inform call mobile to inform follow up? This commutication is a follow up to the email already sent on Sth September to all registered BAps which included Earth Organisation Namiba As such ful notice period of 4 days has previously been advised. Opportunity to comment in writing has been offered as part of the original previous enail were submitted at the Society and the preserved	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Looi Leaders 1900's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthlife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	-         -	Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this	meeting. follow up? follow up? follow up? follow up? This communication is a follow up to the email already sent on 5th September to all registered (alkps which included Earth Organisation Namibia. As such full notice period of 14 days has provided bein advised being the sent of the original mail sent to all faces on 5 Septemen 2021, the commers insel in your process. As explained in the Scoping Report which was also provided to all faceAr for commer prior to submission and acceptance by the	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Lood Leaders NGO's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	-         -           -         -           -         -           -         -           -         -	Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this invitation only this week when comments are due early next week, I do not have time to	meeting. follow up? call mobile to inform call mobile to inform call mobile to inform follow up? This communication is a follow up to the email already sent on Sht September to all registered I&Aps which included Earth Organisation Namibia. As such full notice period of 14 days has previously been advised. Opportunity to comment in writing has been offered as part of the origina email sent to all IB.Aps on 5 septement 2022. The coverns taked in your process As explained in the Scoping Report which was also provided to all BAPA for commestoner they report set to set to provide to all BAPA for commestoner they provide of the stages to define the only	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Lood Leaders NGO's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the	Image: Control of the second	Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this invitation only this week when comments are due early next week, I do not have time to meet with you. I also prefer to comment in writing where comments and responses can be recorded.	meeting. follow up? follow up? follow up? follow up? This communication is a follow up to the email already sent on 5th September to all registered (alkps which included Earth Organisation Namibia. As such full notice period of 14 days has provided bein advised being the sent of the original mail sent to all faces on 5 Septemen 2021, the commers insel in your process. As explained in the Scoping Report which was also provided to all faceAr for commer prior to submission and acceptance by the	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Lood Leaders NGO's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the		Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this invitation only this week when comments are due early next week, I do not have time to meet with you. I also prefer to comment in writing where comments and responses can be recorded. I do not believe my concerns which I sent via email were adequately addressed from the previous comments and responses trial for the Scoupe Report and Teel your response	meeting.  follow up? call mobile to inform call mobile to inform call mobile to inform follow up?  fisionumulciton is a follow up to the email already sent on 5th fisionumulciton is a follow up to the email already sent on 5th fisionumulciton is a follow up to the email already sent on 5th fisionumulciton is a follow up to the email already sent on 5th fisionumulciton is a follow up to the email already sent on 5th fisionumulciton is a follow up to the email already sent on 5th fisionum to the fision of Septeme 2022, the coremers also my out of the presected field and the solution and acceptance by the financement field in the Soping stage of the presected field the fisionum to the field of the fisionum to the field of the fisionum termat for the solution stage. Therefore, an other of the the concerns, A such your concerns could note therefore be adressed in full at fisionum termat for the solution targes. Therefore, an other of the econcerns	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
Lood Leaders NGO's Sea Search: Nam Dolphin Project Namibian Dophin Project Namibian Dophin Project Earthife Namibia	I. Kotze h. Cameyn K. Max Bertchen Kohrs	info@seasearch.co.za	813128967 816876461 816876461 812938085	Windhoek,Windhoek 9000,Namibia PO Box 133, Swakopmund 13001,	Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022 Yes 13.9.2022	went to voicemail sent text message after they replied they couldn't answer at the		Fargnoli. Due to the very tight time constraints on the commenting period and receipt of this invitation only this week when comments are due early next week, I do not have time to meet with you. I also prefer to comment in writing where comments and responses can be recorded. I do not believe my concerns which leart via email were adequately addressed from the previous comments and responses trail for the Scoping Report and I feel your response was disrespectful and did not even refer to the core corganisation. In fact, some serious	meeting.  follow up?  call mobile to inform  call mobile to inform  call mobile to inform  follow up?  This communication is a follow up to the email already sent on Sth September to all registered I&Aps which included Earth Organisation Namibia. As such full notice period of 14 days has previously been advised.  Opportunity to access on Section between the section of the preserviced process. As explained in the Scoping tage of the preserviced process. As explained in the Scoping tage of the preserviced process. As explained in the Scoping tage of the preserviced process. As explained in the Scoping tage of the preserviced process. As explained in the Scoping tage of the preserviced process. As explained in the Scoping tage of the tages to define the scope of work for the Assessment Report which then advesses the inter anised. have been adressed now in the Assessment Report which has been provided now for review. The period provided for comment hey	will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter will call back to confirm receipt of email and letter	NO	NO NO NO
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## Summary of the public consultation process, public and stakeholder meetings and

## related comments from I&APs

								Has their comment
Additional responses received						Submitted	con been responded to	
Indep	endent	Lisa Levin					YES	YES
Indep	endent	Bronwen Currie					YES	YES
Indep	endent	Heidi Potgieter					YES	YES
		Thomas Rathenam					YES	YES
Indep	endent	Angela Alchin					YES	YES



# APPENDIX K – VISUAL RECORDS WALVIS BAY COMMUNITY ENGAGEMENT MEETING

Photo credit: ECC and I&AP attendee Mr Titus Shimanda









## related comments from I&APs

Namibian Marine Phosphate (Pty) Ltd

# **APPENDIX L – WALVIS BAY COMMUNITY ENGAGEMENT MEETING ATTENDANCE REGISTER**

				ENVIRONMENTA COMPLIANCE CONSULTANC	L X
Meet	ing Attendance Register				Date: 19/10/2022
		reblie Cons	ou lafo -		
	e: Evangelical L		urch - Welvis Bay		$\frown$
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Raymond Statemus		ray monds tefor us 2 i cloud. com	0812444 888	The
2	MARVIN MULTUNGA		marvinmuaturgaegonal.com	0814838210	bl-
3	ALBERTINA NYONI		tinaangula@gmail.com	0814310550	9 Ai
4	TITUS SHIMANNA		tshimanda Dyahoo. com	0812175210	×
5	King Mandume Muatunga		Kingmandumem (yahoo, com	0813443716	
6	Junius Hangareda		BHANGArida 88 Q quail. com	0613367874	CARGAN
7	Mavis Matatias			0812948212	Mitche.
8	Sharon Matatias		matatiasharond gmail.com	0813530087	Hotaties
9	Juned Tjileza		Guezgiuned Z@gmai). Con	0813895354	T
10	Shanice Timeza		Ejiuezdshanice@gnail.com	0817654363	Shandog
11	Julanda Plate			0817781727	J. Platcemetsing
12	7. Matze		jar.pldzemetsinglyne; 100	0812411238	Add



## Summary of the public consultation process, public and stakeholder meetings and

## related comments from I&APs

				ENVIRONMENT COMPLIANCE CONSULTA	NCY
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Vieet	ing Subject: <u>- NMP pul</u>	dic Consu	Hation		
/enu	e: Evangelical	Lufberan	Church- Walvis B	ay	
	NAME	ORGANIZATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
1	Johannes Xoogy	/	justsmithxoagub23@gmai	0817610920	Le
2	Jenevieve Timeza	6	tijuezajenevieu@gmail.com	08157725542	Jou.
3	Romic Sockel		Pontwice grail, com	0813228377	K
Д,	Brendy Sorabes		Brendoscoabes queito	0815683442	Bootes
5	Alicia Gases		GasesAlicicio geneilicon	0815683442	trasos.
6	Tuhaferi Malalior		U	0818033000	
7	Norman Slake		norman blake 1 @grail. (an	CX12441177	all Alt
8	ANOREAS HANNGURA			08 573 0 491	All not
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# **APPENDIX M – HISTORIC STAKEHOLDER ENGAGEMENT EVIDENCE**

Community Engagement and Education Activities 2020/2021.

## Introduction

In the period from October 2020 to May 2021, while the Judgment on the legal proceedings initiated by CNFA and 3 other parties was pending, NMP conducted a job registration drive, open to all Namibians to register their interest to be considered for the various potential jobs and roles that are expected to be created based on the proposed development of the Sandpiper Project.

The objective of the exercise was to compile a database of prospective job seekers who would be suitable candidates for employment in the future for various full time, part-time, and casual positions during the construction and operational phases of the project.

Details of the job interest registration process were advertised locally in newspapers, on social media, and on the company's website.

NMP closed its job registration drive on 30th November 2020 with over 6,000 registrants from all across Namibia. A media statement was issued by NMP providing responses to questions raised during the job registration drive by NGOs and the public at large and providing details of the next steps in process.

A series of informative workshops were then held to provide registrants with details about the technical, environmental, and development aspects of the Sandpiper Project's along with the related job opportunities. All registrants were contacted directly by NMP by email or text and issued with information documents and invitations to attend the workshops which were then held in April and May 2021 as virtual meetings (Webinars) subject to prevailing Covid-19 restrictions. On completion of the workshops, all registrants were provided with follow-up communications and copies of the information provided during the Webinars.

Periodic updates are being issued to all registrants as an ongoing community engagement activity.

During this time Chamber of Mines also conducted a broad-based public education and information campaign on Marine Phosphate in which NMP participated as a member of the Chamber of Mines' Marine Phosphate Sub-Committee.

A summary of the key activities and results of the engagement process is provided below.

## Job Registration Drive & Workshop Community Engagement

- 1. Job Registration Drive (Sept-Dec 2020)
- 2. Workshops: Engagement with Community (April-May 2021)
- 3. Workshops: Q&A Sessions with a Segment of the Workshop Information Recipients
- 4. Examples of the Q&A from the Direct Sessions with the Workshops Attendees

## Breakdown:

## 1. Job Registration Drive



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During September to December of 2021, NMP embarked on a job registration drive to compile a database of interested Namibians for future jobs once the Sandpiper Project commences.

NMP received 6,058 registrations, with the majority (96%) coming from Namibia.

Top 3 Cities from which most of the Registrants applied:

City	Total
Windhoek	2114
Walvis Bay	463
Swakopmund	47

### Majority of registrants were male:

Gender	Total
Male	3635
Female	2241
Other	182
Total	6058

## Majority of Registrants were unemployed:

Employed	Total
No	3514
Yes	2544
Total	6058

## Breakdown of the education qualifications of the Registrants:

Education Level	Total
School (matric)	1,666
Skilled	1,277
Trade certificate	1,232
Bachelor degree	1,120
Unskilled	296
Post graduate degree	120
Master's degree	113
N/A	234
Total	6058

#### Majority of Registrants were between 25 and 44:



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Age Group	Total
Under 18	0
18-24	818
25-34	3508
35-44	1230
45-54	237
55-64	26
65+	0
N/A	239
Total	6058

Breakdown of the interest in job categories planned to be offered:

Job Category	Total
Administration (payroll, security, general office duties)	1,298
Construction- General (security, labourers, drivers, and other)	1,045
Maintenance (electricians, mechanics, fitters, boiler makers)	953
Accounting- HR & CSR- IT & Marketing	597
Other	559
Operators (heavy equipment, drivers, transport)	387
Foreman- Supervisors- Managers- Executives	310
N/A	284
Plant Operators (engineers, control room, instrumentation)	258
Geologists- Mine Planning- Environmental- Metallurgists	231
Surveyors- Engineers (civil, electrical, mechanical)	136
Total	6,058

## 2. Workshops: Engagement with 2,512 Community Members

Workshops were held online while the scheduled In-Person sessions were cancelled due to Covid-related regulations and concerns.

A total of 7 Workshops were held online via Zoom on the following dates and times:

- 2021, April 27<sup>th</sup> 9.00am
- 2021, April 27<sup>th</sup> 3.00pm
- 2021, April 28<sup>th</sup> 9.00am
- 2021, April 28<sup>th</sup> 3.00pm
- 2021, April 29<sup>th</sup> 9.00am
- 2021, April 29<sup>th</sup> 3.00pm
- 2021, May 8<sup>th</sup> 9.00am



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NMP engaged with 2,512 community members via the Zoom workshops and emailed presentations, which were opened and downloaded by those who were unable to attend online.

Gender Breakdown of Workshop Information recipients:

Gender	Total
Male	1512
Female	930
Other	2
#N/A	68
Grand Total	2512

Employment Status of Workshop Information recipients:

Employed	Total
No	1541
Yes	774
N/A	197
Grand Total	2512

Age Groups of Workshop Information recipients:

Age Group	Total
18-24	340
25-34	1498
35-44	471
45-54	91
55-64	13
Under 18	1
#N/A	98
Grand Total	2512



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City	Total	City	Total	City	Total	City	Total
Windhoek	944	Outapi	10	Oshikuku	3	Kuruman	1
Walvis Bay	520	Khorixas	9	Otavi	3	London	1
Swakopmund	180	Omuthiya	9	Outapi	3	Maseru	1
Swakopmund	77	Karibib	7	Usakos	3	Mondesa	1
Otjiwarongo	68	Okahao	7	Lusaka	2	Mozambique	1
Oshakati	62	Omaruru	7	Ohangwena	2	Mt Hagen	1
#N/A	66	Gobabis	5	Okakarara	2	Noordoewer	1
Ongwediva	47	Keetmanshoop	5	Onesi	2	Ohangwena	1
Ondangwa	36	Mariental	5	Ongenga town	2	Okankolo	1
Tsumeb	34	Nkurenkuru	5	Ongwediva	2	Omungwelume	1
Okahandja	32	Rehoboth	5	Otavi	2	Onamutai	1
Grootfontein	28	Karasburg	4	Ruacana	2	Onheleiwa	1
Ondangwa	25	Okalongo	4	Tsandi	2	Oranjemund	1
Rundu	21	Onayena	4	Accra	1	Oshakati	1
Keetmanshoop	18	Opuwo	4	Aggeneys	1	Oshandi	1
Luderitz	18	Tsandi	4	Ariamsvlei	1	Oshikuku	1
Arandis	17	Aranos	3	Bethanien	1	Outjo	1
Arandis	15	Harare	3	Davangere	1	Outjo	1
Oranjemund	14	Helao Nafidi	3	Eenhana	1	Pretoria	1
Rehoboth	14	katima mulilo	3	Eheke	1	Rosh Pinah	1
Rundu	14	Koës	3	Engela	1	Sesfontein	1
Rosh Pinah	12	Luderitz	3	Gam	1	Usakos	1
Tsumeb	12	Ogongo	3	Goyang	1	Uukwaluudhi	1
Eenhana	11	Okahao	3	Groot Aub	1	Wanaheda	1
Gobabis	11	Oniipa	3	Havana	1	Warmbad	1
Hentiesbaai	10	Oshikango	3	Katsina State	1	Grand Total	2512
Katima Mulilo	10	Oshikango	3	Kavango east	1		

## 3. Workshops: Direct Question & Answer Sessions with 354 Community Members.

Engaged with and answered questions from 354 community members via Zoom.

Gender Breakdown of community members engaged in the Q&A Sessions:

Gender	Total
Male	196
Female	142
#N/A	16
Grand Total	354



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Employment Status of community members engaged in the Q&A Sessions:

Employed	Total
No	236
Yes	118
Grand Total	354

Age Group of community members engaged in the Q&A Sessions:

Age Group	Total
18-24	37
25-34	213
35-44	70
45-54	9
55-64	2
Under 18	1
#N/A	22
Grand Total	354

Residence Location of community members engaged in the Q&A Sessions:

City	Total	City	Total	City	Total	City	Total
Accra	1	Keetmanshoop	3	Ondangwa	12	Ruacana	1
Arandis	4	Khorixas	1	Ongwediva	8	Rundu	8
Aranos	1	Luderitz	3	Oniipa	1	Swakopmund	37
Eenhana	2	Maseru	1	Oranjemund	1	Tsandi	1
Eheke	1	N/A	1	Oshakati	10	Tsumeb	7
Gobabis	2	Nkurenkuru	1	Oshikango	1	Walvis Bay	72
Gobabis	1	Ohangwena	1	Otavi	1	Wanaheda	1
Grootfontein	2	Okahandja	4	Otjiwarongo	10	Windhoek	135
Helao Nafidi	1	Okahao	1	Outapi	5	Grand Total	354
Katima Mulilo	2	Okakarara	1	Rehoboth	3		
Kavango east	1	Omaruru	1	Rosh Pinah	4		



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## 4. All 205 Questions Received during the Q&A Sessions

Category	# of Questions
Comment	1
Company	4
Environment	14
Feedback	11
Government	1
Other	1
Phosphate	7
Phosphate Mining	2
Project	51
Project / Recruitment	38
Recruitment	64
Workshop	11
Grand Total	205

Name of Questioner	Question	Category
Mbatjiua Katjiukua	I have and still suffering allot and my current salary don't cover my needs i really need this job truck duty driver for over 20 years	Comment
Raimund Amweela	Who are the local partners of NMP?	Company
Petrus Nuuyoma	Do we already have foreign investors towards this project or not yet?	Company
Ruan Cowan	what type of environmental monitoring will you do and/or require during operations?	Environment
Dawid Shikongo	no significant impact???? so what is the non significant impact??	Environment
Galaxy A10s	what is the impact to the food of fish in the sea during sandpiper project	Environment
NCTC9	How important is phosphate to Namibia's marine enviroment?	Environment
Diano Alexander	Well noted, thank you	Feedback
Franciska Bangarah	Thank you.	Feedback
Wilheem Shetunyenga	Thank you very much for an educative workshop. lets keep our hands for amazing news	Feedback
Nelama Toivo	Thanks for your answer sir we want who creating a job opportunities in our country	Feedback
Frieda Musikarakuma	thanks for the answer	Feedback
Petrus Sirunda	Thank you very much for the information and as you comminicate with us and the communite at large.	Feedback



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Shelton Skrywer	Thanks. I am on board.	Feedback
Petrus Kamitse	Good morning all and thank you for this informative webinar.	Feedback
Lydia N. H David	Is there anything we can do to help with the approval from the ministries?	Government
Matthias Eggert	Shell could be used at the DPMT copper smelter in Tsumeb too. Done elsewhere in the world. Smelter use it as a flux in the furnaces	Other
Natalia N Simon	What are types of hazardous materials employees and employers will be exposed too in phosphate mine?	Phosphate
Naftal Lucky Boy Davids	is it the first time that phosphate mining is being impacted in Namibia?	Phosphate Mining
Haiyambo Celestinus Mukuve	Is there ever phosphate mining done before some where around the world which caused damaged to an environment? if not than why is our government concerned, if yes are there no clear procedure to over come it which will make the government understand?	Phosphate Mining
Ruan Cowan	how long will the construction phase be?	Project
Efraim	What sort of CSI initiatives does NMP have in place?	Project
Hilka Bamutuwa	There is no project without advantages and disadvantages this can be on the environment or other things. What disadvantages are we to face once this project kicks of.	Project
Philipus Haunda	What is a potential side effect of the phosphate mine. Not everything is a 100% without any disadvantage either to the environment or the economy at large.	Project
Robert Patelius	What is the estimated throughput/tonnes per hour that will be collected from the seabed? And what is the estimated plant throughput?	Project
Matthias Eggert	Hi. Thanks for the informative webinar. Are there plans for future expansions (more than one ship) or is the plan to stick to one vessel?	Project
Leonarft Simdon	Were is the land service situated, and I am refering to the workshops. Has the municipality already approved the land	Project
Filippa Amupadhi	Will NMP have a local market to sell our product or will we only export the raw material?	Project
Fillemon Kornelius	Will phosphate into products processing be done in Namibia or outside?	Project



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Petrus Nuuyoma	Looking at the phosphate industry at large, how many percentage of our final product will be for local consumption?	Project
Raywill Jackson	What cycle will the sea going workers be working? 28 days offshore and 28 onshore?	Project
Ferdinand Ferdos	Where is your office located in walvis bay	Project
NPM meeting	We try to contact NMP but the phone doesn't go through would NMP please provide us with a valid contact number	Project
Galaxy A30	Incase the court outcome approves the mining to go on, is the mining plant been set up already in Walvis Bay?	Project
Laina Andreas	I would like to receive the note on my email about phosphate mining thank you.	Project
Amutenya Evelina Lukeniko Metine	lets say the project do get to be approved, will namibian researchers be allowed to partake in commissioning of the process and all pilot tests ? because there sure is plenty research candindates who have based their research work on this project	Project
Sipora Metjavi	Whats the plan in future for educating all Namibian about the social and economical benefits of phosphate to the Namibian community at large? i have been following this on social media and it seems Namibian are misinformed about this project.	Project
Stefanie Naruses	What are the projected benefits to the community?	Project
Dirkie Maikhudumu	what will be the way forward if the court case does not go in your favour?	Project
Beath Haulofu	When is the Nmp court case?	Project
Paulus Nakale	how long will it take for the project to start if the court ruled in favour of NMP?	Project / Recruitment
Hafeni Niingungo	Are all the minings going to start all at the same time	Project / Recruitment
desmond sehama	when will construction begin	Project / Recruitment
Newaka Johannes	when the mine start to operate?	Project / Recruitment
Josafath Shikongo	when recruitment rolling on?	Project / Recruitment
Dawid Shikongo	hypothetically if the clearance is given in june how long will it take to be operational	Project / Recruitment



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Johannes Erastus	Is there a possibility for project to start this year?	Project / Recruitment
Gadzikai Madembo	Suppose the court rules in favour of NMP on June, approximately when are you anticipating to start with land acquisition? I am so excited with job opportunities and the reason I ask this is to get an approximate time to get job opportunities since it was stated earlier that at this stage more recruitment will begin	Project / Recruitment
Monica Muhekeni	Approximately how much time will it take before the construction phase starts?	Project / Recruitment
Zocks	now if you win the case on the 11th of may what is the way forward	Project / Recruitment
Belinda Naris	Good morning, when will the project kick off?	Project / Recruitment
Galaxy A10s	After NMP granted the Clearance Certificate for environmental how long it take to commence sandpiper project?	Project / Recruitment
Simon simantu Munuma	how long NMP waiting the certificate?	Project / Recruitment
Susana Shilomboleni	Will you recruit people in the first phase after the court case who will join after this meeting?	Project / Recruitment
Martha Ukamba	when can the project going to open?	Project / Recruitment
Malakia Thigenipo	Good day, What percentage of jobs are to be automated once the project become operational?	Recruitment
Hisense C30 Lite	as we have problems of housing in Namibia, do this company willings to provide it's employees with houses or a place to call home, if it started ? from Johannes	Recruitment
Galaxy-J2	Is accommodation/transportation arranged or do we have to make use of our own?	Recruitment
Onesmus Tshavuka	if we happen to be hired is the accomodation provided or do we have to seek for that?	Recruitment
Lucia Kaunapawa Kashimbode	Will the company be providing transport and accommodation to workers	Recruitment
Douglas Michael Haipare	Will employees that work offshore stay in Walvis bay or on the vessel?	Recruitment
Simon simantu Munuma	If the project goes successfully complete where will be the employees allocated?	Recruitment
Silas Amawe	Will advertise the vacancies or you will just look at the one who registered previously	Recruitment



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Elifas Nekayi	When it comes to employment, is it only those that registered who will be considered, or will you again advertise positions?	Recruitment
Victoria Jason	People that missed out on registration, can they still do it?	Recruitment
Stefanus Shipeta	what will happen to those that have their cv and supporting documents that didn't go through because of the technical problem that was there when they were sending them	Recruitment
Martha Ukamba	what procedures will you use for recruitment process?	Recruitment
Leonarft Simdon	The project economy of the project! Will the company going to exhaust the local when it comes to skills developmwnt	Recruitment
Matheus Kakelo	what assurance do Namibians have that they wont be missing on jobs to foreigners as other projects?	Recruitment
FRANS HAUSIKU HAMUTENYA	How will the employment be? will you recruit permanent only or some will be temporary?	Recruitment
Faizel Pankratius Swartbooi	Is there Permanent job security	Recruitment
Tulinane Shikongo	What type of qualification are you looking at for one to be considered?	Recruitment
Leezola Zongwe	What is the highest level of education you envision needing, for example in your legal department? Would a PH.D holder be disqualified due so-called over qualification?	Recruitment
Martin Taati Nambahu	if this project come to pass, will you employ workers with marine experience or with other industrial experiance	Recruitment
Veiyo Nelenge	Good afternoon? does that mean a Seatime will be a requarement to everyone once the project starts?	Recruitment
Frieda Musikarakuma	is there any qualification inquired	Recruitment
Laina Andreas	What are the requirements needed for one to work for phosphate mining?	Recruitment
Ivan Bohmer	Will there be jobs available for people with only a high school Matric qualification and/or will there be any on the job training positions for those people?	Recruitment
Ashley Draghoender	If possible can you send a detailed list of what jobs will be available	Recruitment
Matheus Natngwe Iyambo	will NMP have its own employees or they will all work under contractor	Recruitment



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Frieda Andreas	I am not seeing an option of health and safety in the job list. Is this not going to be needed?	Recruitment
Nuundjomba Felix m	over 600 jobs, how many drivers do you need?	Recruitment
Obert Likando	Will NMP require Customs clearing experts to handle the imports and export through customs?	Recruitment
Galaxy-J2	Will there be an in_services training	Recruitment
R Usher	any special training before we comence with work like on modern technology	Recruitment
Raywill Jackson	Good morning. As answered a question on special training required. I.e seamen or able seafarer. Would we need extra special requirements to be able to do that training?	Recruitment
Mbatjiua Katjiukua	how will the contacting be done via email or telepathically just in case one i lose my phone or so.	Recruitment
Stefanus Shipeta	how do we apply for the feature jobs	Recruitment
Ismael Lyamanguluka Gabriel	I just join the work shop a bit late, is this only the workshop or there's will be another coming?	Workshop
Efraim Shimbali	May you please share the recorded video to the emails after the presentation	Workshop
Panduleni (Galaxy S5)	What is the topic of today?	Workshop
Naftal Lucky Boy Davids	today we were only going through the company's aims and goals? not really individual interview.	Workshop

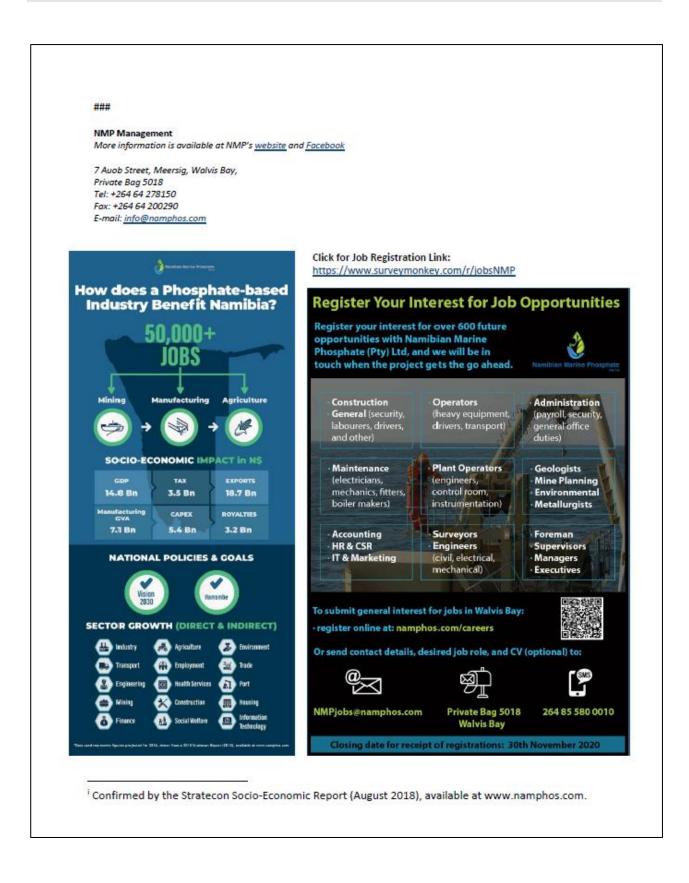


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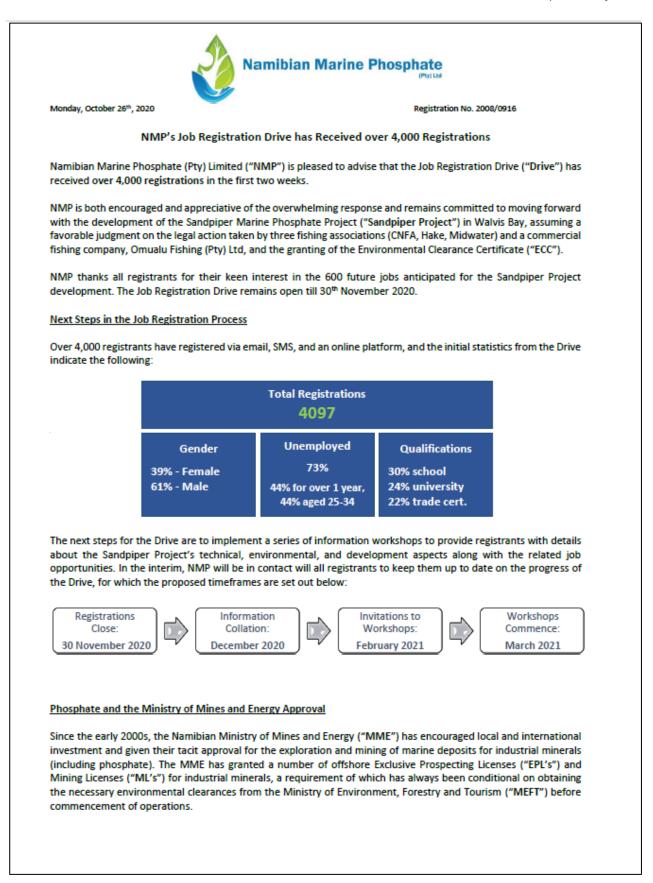
# **APPENDIX N – NMP WORKSHOP MEDIA STATEMENTS**

Thursday, October 1 <sup>st</sup> , 2020	Registration No. 2008/0916
NMP Invites Na	mibians to Register an Interest for Future Opportunities
	e contributor to Namibia's GDP representing 10% of GDP on average, and going forward will be important in stimulating the national economy, creating nic impacts of Covid 19.
ob Registration Drive	
"Sandpiper Project") will provide a p	believes that the development of the Sandpiper Marine Phosphate Project positive contribution to Namibia's Mining Sector and the broader national ns (directly and indirectly) for construction and operations in Walvis Bay and her economic sectors. <sup>i</sup>
favorable Judgement on the review app	h preparation of the Sandpiper Project development, in anticipation of a plication brought by three fishing associations (CNFA, Hake, Midwater) and a ishing (Pty) Ltd, which was heard in the High Court of Namibia on 7 <sup>th</sup> July.
	P is embarking on a job registration drive, providing all Namibians the be considered for the various jobs and roles that are expected to be created ent commences.
candidates for employment in the futur Project's construction and operational interactive workshops with the registra	compile a database of prospective job seekers who would be suitable re for various full time, part-time, and casual positions during the Sandpiper phases. Following registration of interest, NMP plans to conduct a series of nts to provide relevant information on NMP's proposed operations and the registration process will be advertised locally in newspapers, on social
Job Creation and Socio-Economic Bene	fits Resulting from the Development of the Sandpiper Project
Environment, Forestry and Tourism, as existence and development of industrie	tive engagement with the Ministry of Mines and Energy, the Ministry of well as the Ministry of Fisheries and Marine Resources to ensure both co- es in the marine environment. Seabed Mining is already well established as and NMP looks to replicate or even improve on the established operational nd fisheries.
-	sponsible commercial, social, and environmental development of the enefit of all stakeholders. To date, shareholders have invested more than iper Project.
<ul> <li>create opportunities for SMEs</li> <li>spend an estimated N\$ 1 billion</li> </ul>	directly and indirectly) for construction and operations in Walvis Bay s and other economic sectors on on civil and local infrastructure of N\$ 5.2 billion for the development V\$ 4.2 billion 650 million/year











from I&APs

Namibian Marine Phosphate (Pty) Ltd

#### Decisions on Environment to be Based on Science and Evidence

NMP fully supports that relevant scientific and evidence-based decision-making is of fundamental and critical importance in the environmental assessment and approval process. The decision to approve and issue an ECC for any mining project rests with the Environmental Commissioner ("EC") and the Minister, MEFT.

### Scientific Data Supports Co-Existence of Marine Phosphate Mining and Commercial Fishing

NMP's comprehensive Environmental Impact Assessment ("EIA") and supporting specialist studies and expert opinion show that phosphate mining and fishing <u>can</u> co-exist and the project will have <u>no</u> significant impact on the Benguela marine environment or ecosystem.

In accordance with the requirements of the Environmental Management Act (2007), NMP has spent over N\$20.0m in completing an extensive environmental study including but not limited to the following, all of which are available at the Office of the Environmental Commissioner and on the NMP website:

- Environmental Impact Assessment,
- Verification Study,
- Environmental Management Plan and
- 28 independent Specialist Scientific Studies

NMP is confident that it has provided the EC and MEFT with what has been described as one of the most comprehensive sets of specialist EIA studies ever completed in the project area and the Benguela Current Large Marine Ecosystem. This comprehensive body of scientific data, analyses, and expert opinions has been submitted to the EC and MEFT to enable an informed and science-based assessment and decision to be made regarding the application for the Sandpiper Project's ECC.

NMP and its shareholders remain convinced that the expert opinions presented scientifically substantiate and support that marine phosphate mining and fishing can co-exist alongside the other ocean-based industries operating in the Namibian marine environment, including those related to marine diamond mining, shipping, tourism, conservation, and military requirements.

#### Looking Ahead

NMP and its shareholders would like to thank all registrants in the Job Registration Drive for their interest in the Sandpiper Project and the job opportunities that will be become available once the legal challenge is overcome and the project permitting is completed.

NMP remains fully committed to the responsible commercial, social, and environmental development of the Sandpiper Project for the benefit of all stakeholders and Namibians at large.

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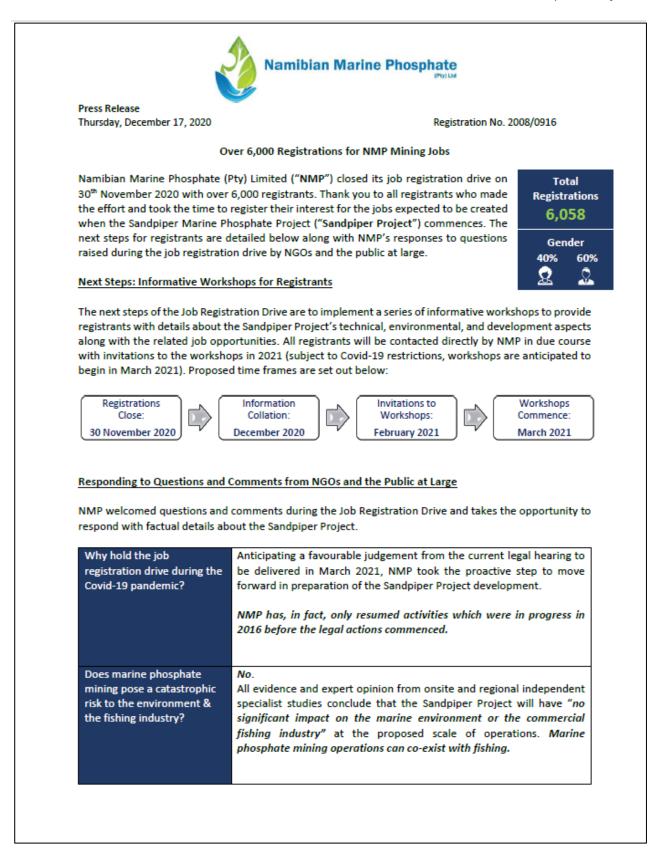
#### NMP Management More information is available at NMP's <u>website</u> and <u>Facebook</u>

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Has an Environmental Impact Assessment ("EIA") been completed and is it available to the public?	Yes. The EIA concludes that the Sandpiper Project will have "no significant impact on the marine environment or commercial fishing industry". In accordance with the requirements of the Environmental Management Act (2007), the EIA is available at the office of the Ministry of Environment, Forestry and Tourism, and on the <u>NMP website</u> .
Was the EIA conducted by independent specialists and were the public consulted?	Yes. Internationally-renowned consultants provided the supporting studies for the EIA. Yes. 18 public and stakeholder consultations were held, all of which were documented.
How many jobs will the Sandpiper Project create?	The Sandpiper Project will employ over 600 Namibians (directly and indirectly) for construction and operations in Walvis Bay. According to the Chamber of Mines Namibia's 2019 analysis, for every 1 new job created in the mining industry, 7 additional new jobs are created indirectly in the economy, forecasting that Sandpiper Project will create 4,200 jobs.

NMP would like to thank all job drive registrants for their interest in the Sandpiper Project, and NMP remains fully committed to the responsible commercial, social, sustainable and environmental development of the Sandpiper Project in Namibia for the benefit of all stakeholders.

To date, shareholders have invested more than N\$780 million into NMP and the Sandpiper Project. The Sandpiper Project could be the first building block for developing a phosphate-based industry in Namibia, which could result in over 50,000 jobs (see infographic attached for more info.)

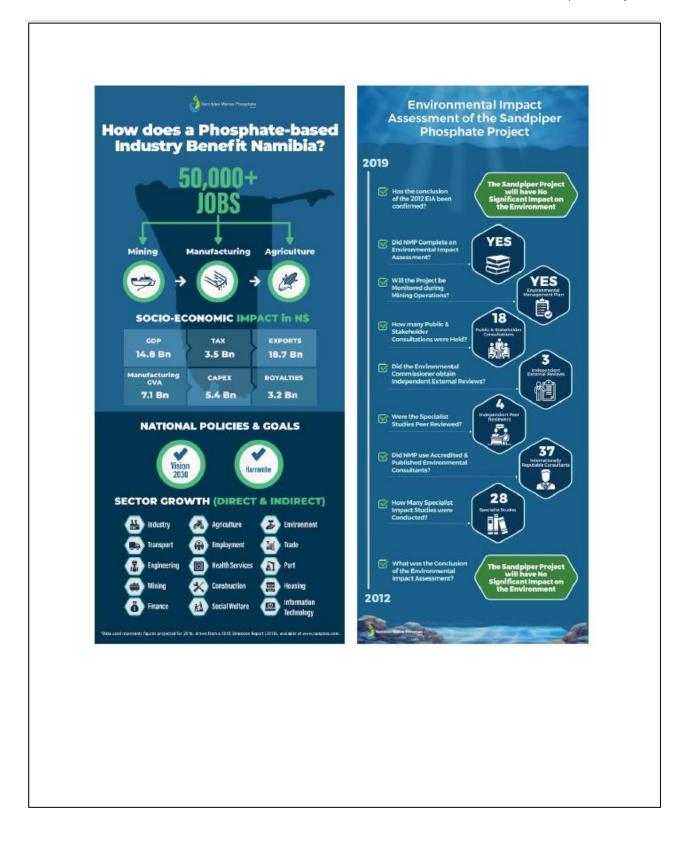
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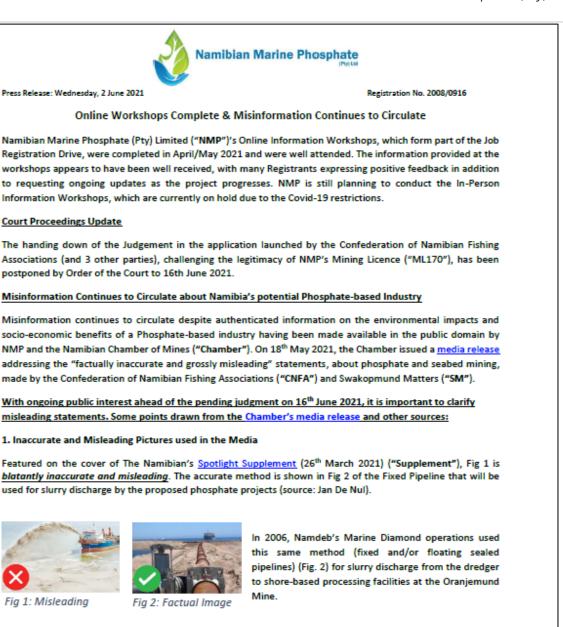
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#### 2. Incorrect Claims that Namibia's Current Seabed Mining Industries Lack Adequate Regulation

In the same Spotlight Supplement, the CNFA states that "a legal framework for seabed mining is necessary but non-existent. Self-regulation by an industry does not work."

This is factually inaccurate as the Namibian Minerals (Exploration and Mining) Act 1992 effectively regulates Namibia's terrestrial and seabed mining industry; and, under their purview, the Diamond seabed mining industry has successfully operated for around 20 years, becoming a cornerstone of the Namibian economy.

#### 3. Unfounded Claims about Seabed Recovery

The CNFA also states in the Spotlight supplement that "it is universally accepted that the type of damage caused by seabed mining is unlikely to recover for decades if not centuries."

This is also misleading. Evidence from an independent 2008 <u>BCMLE study</u> on the cumulative impacts of the effects of Marine Diamond Mining, from repeated monitoring studies over a 10-year period, shows that the seabed <u>does recover</u> within a period of 2 - 15 years after seabed mining.



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#### 4. Unsubstantiated Allegations that More Thorough EIAs and Verification Studies are Required

In the Spotlight Supplement and in <u>The Namibian's 5<sup>th</sup> May 2021 article</u>, both the CNFA and SM alleged that more thorough Environmental Impact Assessment ("EIA") and verification studies on marine phosphate mining are required as they currently do not address many of the key issues that the fishing industry has raised.

The Chamber notes that: "These assertions are factually incorrect and misleading. Namibia's Environmental Management Act (2007) requires all mining and exploration projects to carry out a thorough EIA. Furthermore, Namibian Marine Phosphate ("NMP")'s Environmental impact studies are publicly available and considered by experts in the Benguela marine system to be 'one of the most extensive EIAs ever undertaken in Namibia.' Also, the fishing industry has been part of the entire EIA process as a registered stakeholder."

5. NMP Extends an Invitation to NGOs to Address their Concerns

Once again, environmental lobby groups have made numerous allegations that are procedurally incorrect and scientifically unsubstantiated in both the <u>Spotlight Supplement</u> and <u>The Namibian's 5<sup>th</sup> May 2021</u> article.

NMP welcomes an open dialogue with NGO groups regarding any concerns they have and, in the interim, direct them to NMP's extensive environmental studies that have been made available to the public through the office of the Environmental Commissioner at the Ministry of Environment, Forestry and Tourism.

The graphic below outlines the steps required for NMP to reach the production stage:



#### Factual Information about the Marine Phosphate Industry to Note:

Independent scientists and specialists have concluded that at the proposed scale of operations:

 NMP's Sandpiper Marine Phosphate Project ("Sandpiper Project") will have no significant impact on the marine environment

- he manne environment,
- marine-based industries can co-exist (i.e. fishing, diamonds, and phosphate), and
- phosphate mining will not kill the fishing industry.

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#### NMP Management

More information is available at NMP's website and Facebook

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