

REPORT

BACKGROUND INFORMATION DOCUMENT FOR THE PROPOSED CONSTRUCTION AND OPERATION OF AN ADDITIONAL TAILINGS STORAGE FACILITY (TSF3), ERONGO REGION, NAMIBIA.

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1 BACKGROUND INFORMATION DOCUMENT

1.1 PURPOSE OF THIS DOCUMENT

Environmental Compliance Consultancy (ECC) has been contracted by QKR Navachab Namibia Gold Mine (Pty) Ltd as their environmental assessment practitioner (EAP) to conduct the environmental and social impact assessment (ESIA) for the proposed construction and operation of tailings storage facility three (TSF3), Erongo Region, Namibia.

The purpose of this background information document (BID) is to provide interested and affected parties (I&APs) a background to the proposed Project and to invite I&APs to register as part of the environmental and social impact assessment (ESIA) process.

All registered I&APs will be kept informed throughout the ESIA process. Registration provides a platform for participants to submit comments, concerns or recommendations regarding the proposed Project. This BID includes the following information:

- The proposed project overview and location;
- The necessity of the Project, benefits or adverse impacts anticipated;
- The alternatives within the Project that will be considered and assessed;
- How the ESIA process works;
- The public participation process and how to become involved; and
- The next steps and the way forward.

1.2 DESCRIPTION OF THE PROPOSED PROJECT

QKR Navachab Namibia Gold Mine (Pty) Ltd propose to construct a 20 Mm³ tailings storage facility (TSF), which is located onsite 10 km southwest of Karibib, Erongo Region (Figure 1 – Site locality map).

The construction of TSF 3 will allow Navachab to continue operations for the rest of the life of the mine (LOM) while ensuring the safe disposal of tailings from the carbon in-pulp (CIP) plant. This will ensure the continued provision of employment to thousands of people. The construction of the TSF will require the mine to hire outside contractors and a labour force from Karibib and surrounding areas. The location of TSF on the mine site is shown in Figure 2.

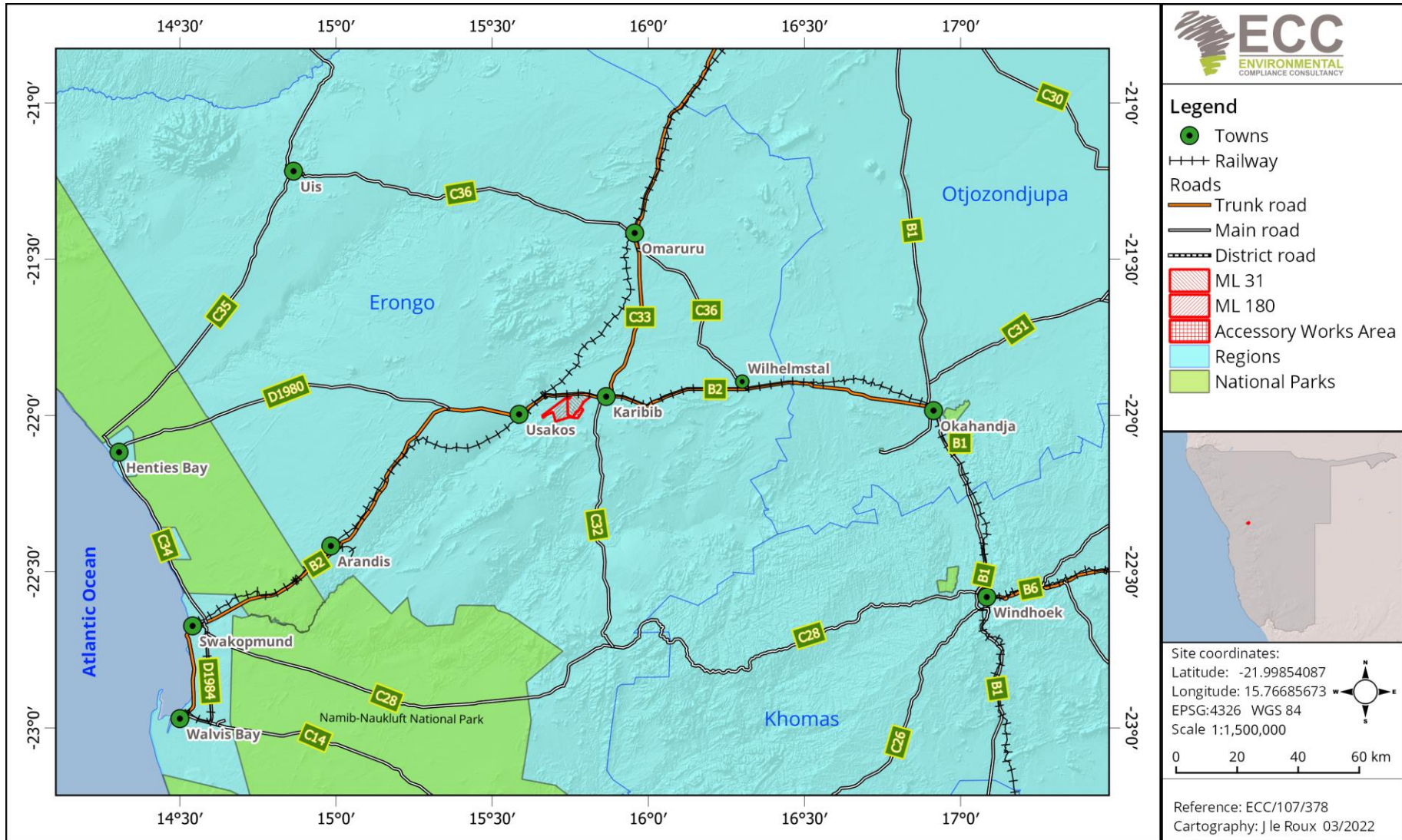


Figure 1 – Site locality map

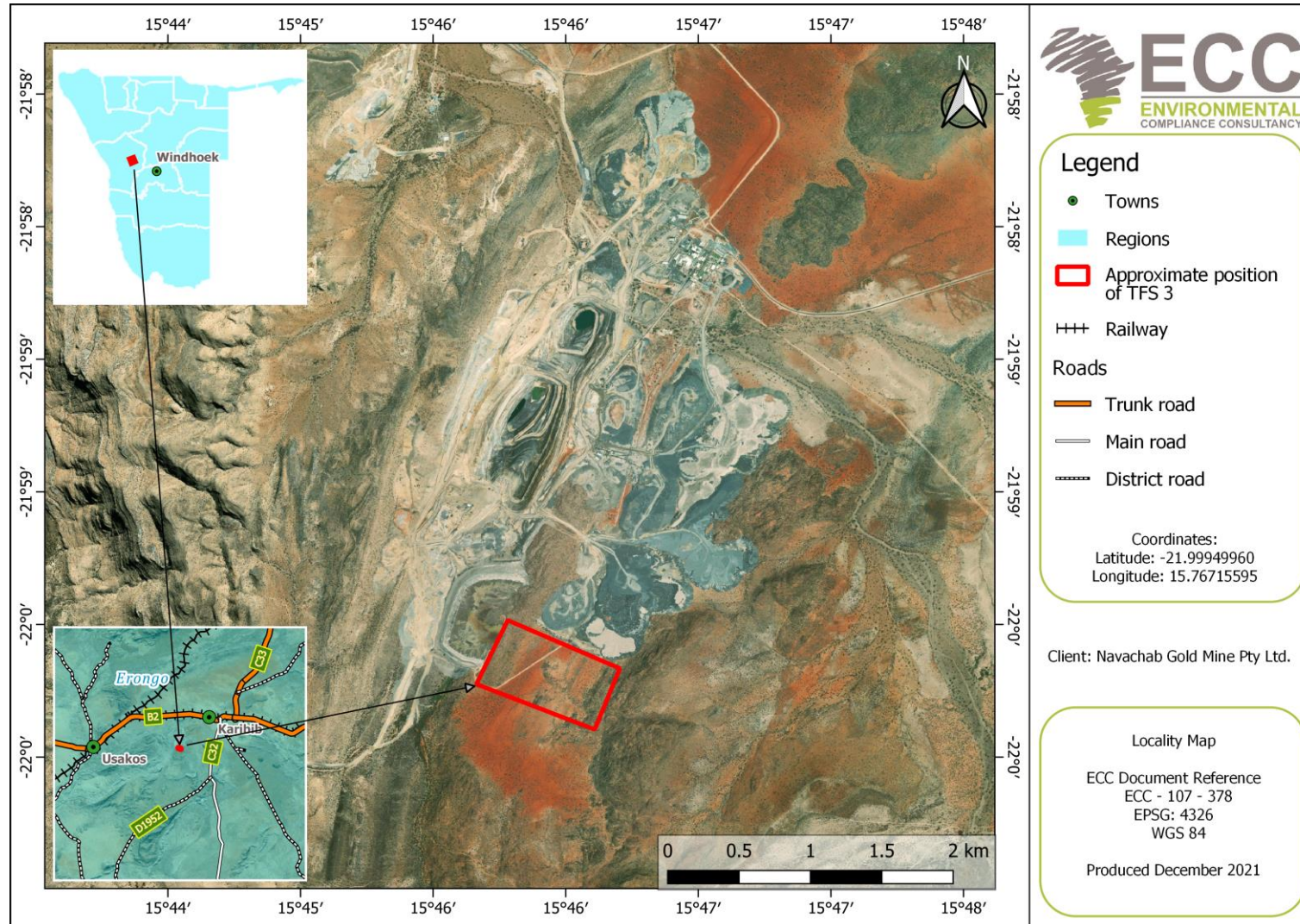


Figure 2 - TSF3 location close-up image of TSF3 location on the mine

1.3 NEED FOR THE PROJECT

New mining activities will contribute to the national and local economies and have a positive impact on the country's economy. Should the Project prove economically viable, the Namibian economy will benefit from revenues and employment during the construction phase, royalties and taxes during the life of mine (LoM) and a positive contribution towards employment, local skills development and training.

1.4 CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives within the proposed Project. During the assessment phase, alternatives will be considered and assessed. The alternatives will aim to optimise designs and processes to reduce potential impacts.

There were no other readily available and feasible sites, and the current identified location is well located on the mine site to the east of TSF2 between two rock ridges and buttressed to the north by waste rock dumps.

During the ESIA assessment, alternatives will take the form of consideration of optimisation and using eco-friendly solutions to reduce potential impacts.

2 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PROCESS

The ESIA for the proposed Project is being conducted by ECC and will be undertaken in terms of the Environmental Management Act, No.7 of 2007 and its associated Regulations. The process followed for this ESIA is set out in the flowchart in Figure 3.

ECC has been contracted by QKR Navachab Namibia Gold Mine (Pty) Ltd, as the independent Environmental Assessment Practitioner (EPA), to facilitate the whole ESIA process. Prior to the start of the proposed Project, an environmental clearance certificate has to be issued in terms of the Environmental Management Act, 7 of 2007 and the associated EIA Regulations.

A final decision relating to the above-mentioned application will be made by Ministry of Environment, Forestry and Tourism (MEFT): Department of Environmental Affairs (DEA).

The related environmental process will include:

1. Screening phase (completed);
2. Scoping phase which includes baseline studies and the development of the Terms of Reference (ToR) for the ESIA (initiated); and
3. Assessment phase which includes impact prediction and evaluation of alternatives, assigning mitigation measures and developing monitoring and conceptual rehabilitation plans. This phase culminates in the drafting of the ESIA report and environmental management plan (EMP) and submission to the appropriate competent authorities (future phase).

The main objectives of the ESIA are to:

- a) Provide information describing the proposed Project and associated activities;
- b) Provide an independent environmental and social assessment of the activities associated with the proposed Project; and
- c) Develop management and mitigation measures associated with any identified potential impacts where necessary.



Figure 3 - Flowchart of the environmental and social assessment process

2.1 SCREENING

In terms of section 32 (1) of the Environmental Management Act, No. 7 of 2007, ECC has determined that the Ministry of Mines and Energy (MME) is the competent authority for the proposed mining Project. Mining activities trigger the Environmental Management Act and associated Regulations as it involves undertaking listed activities. The relevant listed activities are provided in Table 2.

A review of the planned Project was undertaken and the screening findings against the listed activities was conducted; the findings of which are summarised in Table 1.

Table 1 – Listed activities triggered by the proposed project

Listed Activity	Mining Activity
<p>WASTE MANAGEMENT, TREATMENT, HANDLING, AND DISPOSAL ACTIVITIES</p> <p>(2.1) The construction of facilities for waste sites, treatment of waste and disposal of waste.</p> <p>(2.2) Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976.</p> <p>(2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.</p>	<p>- Construction of a tailings storage facility, and</p> <p>- A septic tank will be installed on-site (operational phase) and chemical toilets will be used during the construction phase.</p>
<p>FORESTRY ACTIVITIES</p> <p>(4.) The clearance of forest areas, deforestation, afforestation, timber harvesting, or any other related activity that requires authorisation in terms of the Forest Act, 2001 (No. 12 of 2001) or any other law.</p>	<p>- Vegetation clearing will be required for site construction of the tailings storage facility.</p>

Listed Activity	Mining Activity
<p>WATER RESOURCE DEVELOPMENT</p> <p>(8.5) Construction of dams, reservoirs, levees, and weirs.</p> <p>(8.6) Construction of industrial and domestic wastewater treatment plants and related pipeline systems.</p>	<p>- Construction of a 20 Mm³ tailings storage facility and the dam will be built with the coarse fraction of the sandy tailings from cyclones as well as run of mine, non-mineralized mine waste rock.</p>
<p>HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE</p> <p>(9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974.</p> <p>(9.2) Any process or activity which requires a permit, licence or other form of authorization, or the modification of or changes to existing facilities for any process or activity which requires amendment of an existing permit, licence or authorization or which requires a new permit, licence or authorization in terms of a governing the generation or release of emissions, pollution, effluent or waste.</p>	<p>- Storage of tailings: similar to existing operations over the past few decades, once TSF3 is constructed, the gold processing fine waste, or tailings, will be piped to the storage facility in existing pipelines and along existing routes. Tailings slurry will be discharged and stored within the facility. As part of the gold recovery process, the slurry will have elevated concentrations of cyanide (CN). CN destruction will take place within the pipeline and within the facility, typically by oxidation. Exposure to air, wind, and sunshine typically destroys CN quickly. The water fraction of the slurry will naturally decant and separate from the tailings sands. It will pond against the western rock ridge from which the water will be pumped back to the processing facility for reuse. TSF3 will be constructed and operated like the currently operating TSF2.</p> <p>- A septic tank will be installed for the permanent ablutions that will be constructed.</p> <p>- Chemical toilets will be used during the construction phase of the project.</p>

2.2 SCOPING

The scoping phase is directed towards defining the range and nature of anticipated potential impacts that may have a significant impact on the biophysical and social environments based on the scale of the proposed operations. The appropriate available data and literature are identified, forming the starting point for the assessment against project aspects. Specialist studies may be required for the assessment of potential impacts, which will require the development of targeted specialist ToRs.

2.3 BASELINE STUDIES

For the proposed Project, baseline information will be obtained through all available field surveys and the existing specialist studies as well as any extra specialist studies due to any gaps identified. These studies also give a further indication of whether there are any local or regional future developments that could impact the Project or vice versa.

The ESIA will focus on the environmental receptors that could be affected by the proposed Project. ECC will also engage with stakeholders, I&APs and the Proponent to seek input into the assessment. The baseline studies chapter is broken into three sections; the baseline context, environmental (physical and biological) and social (includes economic) contexts.

Lastly, the socio-economic section of the baseline studies helps to present information on the governance, demographic profile, social stratification (employment, education, crime, infectious disease), occupation, and livelihoods of those potentially affected (economic activities, occupations in the study area, employment rates).

2.4 TERMS OF REFERENCE

Based on the stakeholder engagement outcome through the defined public consultation process, including any written correspondence and the baseline studies, the ToR for the impact assessment will be finalised and confirmed with the Environmental Commissioner.

2.5 STAKEHOLDER ENGAGEMENT

The public and key stakeholders receive invitations to register as I&APs through newspaper adverts placed in the public domain, site notices placed onsite or on the boundary of the site and direct mail. After the presentation of the proposed Project and ESIA process through the defined public consultation process, a period of time for input will be granted for the environmental assessment practitioner (EAP) to receive any additional concerns or comments raised from registered I&AP's. All feedback from the initial public consultation process will be incorporated into the scoping report.

2.6 SCOPING REPORT

The scoping report will be drafted and made available to the registered I&APs for comment before being submitted to the competent authority and MEFT. The scoping report will contain a description of the Project and the biophysical and socio-economic environments, the stakeholder engagement report, and the terms of reference for the ESIA.

2.7 THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT PHASE

2.7.1 POTENTIAL IMPACTS

The potential environmental and social impacts should be considered with due regard to the nature and scale of the proposed operations, its location within the broader ecological, commercial and social environments. The potential environmental and social impacts that have been anticipated may include the following:

- A limited number of jobs will be created as a result of the project;
- Potential to unearth, damage or destroy undiscovered heritage remains;
- Occupational health and safety;
- Potential visual disturbances to nearby landowners; and
- Minor disruption to the residents of neighbouring farms, including some potential increase in noise levels during the construction phase.
- Disturbance of soil during the construction phase;
- Potential soil erosion within cleared areas;
- Potential groundwater and soil contamination from chemicals or hydrocarbons spilled during construction and maintenance; and
- Potential sewage or chemical spills from the septic tank and portable chemical toilets.
- Potential impacts on biodiversity and ecology through habitat fragmentation or habitat loss;
- Potential disturbance or displacement of protected or vulnerable species; and
- Potential impacts on water and groundwater resource.

2.7.2 DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

An EMP shall be developed for the proposed Project setting out auditable management actions for the Project to ensure careful and sustainable management measures are implemented for their activities in respect of the surrounding environment and community. The EMP becomes the legally binding commitment upon approval of the EMP and issuing of the environmental clearance certificate. Environmental clearance certificates are issued for a period of 3 years and renewal is subject to compliance with the provisions and conditions of the environmental clearance certificate.

3 THE WAY FORWARD – PUBLIC PARTICIPATION

Public participation is an important part of the ESIA process. It allows you, the public and stakeholders to raise concerns or provide valuable local environmental knowledge that can benefit the assessment process as well as aid the planning process for the scoping phase of the defined assessment process. At this phase ECC will perform the following:

- Prepare and submit the application for the environmental clearance certificate in the prescribed manner
- Identify relevant key stakeholders, authorities, environmental groups and interested or affected members of the public, hereafter referred to as I&APs
- Carry out a public consultation process in accordance with Regulation 21 of the EMA 2007 including:
 - o Distribute the BID for the proposed Project (this document).
 - o Advertise the environmental application and call for registration of I&APs in two national newspapers.
 - o Open an I&AP register, record all comments of I&APs and present such comments, as well as responses provided by ECC in the comments and responses trail, which will be included in the scoping report that shall be submitted with the application.
- Prepare a scoping report and provide the same to registered I&APs for comment
- Submit the scoping report and the I&AP comments to the competent authority and Environmental Commissioner for a record of decision.

Your request for registration as an I&AP as well as any comments on the BID or Project must be submitted in writing and can be emailed using the details in the contact us section below. Registration as an I&AP for the Project can be completed online on ECC's website on the projects page, or by using this link: <https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-an-additional-tailings-storage-facility-tsf3-erongo-region-namibia/>

Registration as an I&AP should be submitted on or before 29 July 2022.

We welcome any enquiries regarding this document and its content. Please contact:

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