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ADDENDUM REPORT:

I&AP COMMENTS AND RESPONSES ON DRAFT SCOPING REPORT FOR THE OMITIOMIRE COPPER MINE ON ML 197

PROJECT NUMBER: ECC-134-394-REP-16-D

REPORT VERSION: REV 01

DATE: 12 JULY 2023



Prepared by:

TITLE AND APPROVAL PAGE

Project Name: I&AP Comments and Responses on draft scoping report for the
Omitiomire Copper Mine on ML 197

Client Company Name: Craton Mining and Exploration (Pty) Ltd

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Ministry Reference: APP-0010357/APP-001107

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Status of Report: Final for Government submission

Project Number: ECC-134-394-REP-16-D

Date of issue: 12 July 2023

Review Period NA

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ABBREVIATIONS

ABBREVIATIONS	DESCRIPTION
EAP	environmental assessment practitioner
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
I&APs	interested and affected parties
km	kilometre
m	metre
MEFT	Ministry of Environment, Forestry and Tourism
ML	mining licence
MLA	mining licence area
MME	Ministry of Mines and Energy

1 INTRODUCTION

1.1 PURPOSE OF THE COMMENTS CONSOLIDATION REPORT

This document has been compiled following the required period of review to be provided for public and registered interested and affected parties (I&APs) to have access to and opportunity to comment in writing on the draft scoping report for the proposed Omitiomire Copper Mine, Khomas Region, Namibia (the Project) before submission to the Environmental Commissioner.

The draft scoping report was completed for the Project and undertaken in accordance with the requirements of the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act (EMA), 2007 (Act No. 7 of 2007).

Environmental Compliance Consultancy (ECC) prepared the scoping report, which was provided to the public and registered I&APs for review for 14 days from 30 May -13 June 2023.

This document compiles all comments received during the public review period; presents the responses from ECC as the appointed environmental assessment practitioner (EAP) for the project, the Proponent and specialists engaged in the assessment.

The document has been set out to provide a concise summary as set out below in Table 1.

Table 1 - Report structure

Chapter	Title	Content
-	Acronyms	A list of acronyms used throughout the report.
1	Introduction	This chapter introduces the addendum report provides background information on the scoping report process.
2	Summary of comments	This chapter provides a summary of key issues raised in comments in submissions received from I&AP's and stakeholders.
3	Detailed comment and response table	The full set of comments received from IAPs during the public review period with detailed responses provided to all comments received.
4	Acknowledgements	Provides acknowledgements to relevant parties for participation in the scoping process as detailed in the scoping report and addendum.
Appendix	A	Original submitted comments and responses

2 SUMMARY OF COMMENTS FROM I&APS

2.1 INTRODUCTION

In accordance with the Regulations of the EMA 2007, on the 30th of May 2023 the scoping report was circulated electronically to all registered interested and affected parties (I&APs), identified key stakeholders. Submissions received from 1 individual was collated in a separate “Comments and Responses” table per that are presented in Table 2. Responses have been provided to all comments received. The original submissions as received from I&APs are provided in Appendix 1.

2.2 KEY FEEDBACK ON ISSUES OF CONCERN

The scoping report was provided to all I&APs, identified stakeholders and made publicly available on ECC’s website. This public review period is set out to solicit comments, feedback, and allow genuine participation in the final phase of the ESIA process. Several comments were received from Marius and Nikki Basson owners of Farm Omakapu, No.104. The key area raised from the review of their comments can be summarised as follows:

Air Quality monitoring

The owners of Farm Omakapu, Marius and Nikki Basson had a few questions pertaining to environmental and baseline monitoring. They requested various dust bucket and air quality testing stations be set up on their farm to establish the current baseline of air quality on their farm to then eventually compare and assess any changes once the mine is in operation as this may affect the operations of their lodge. The EAP will be in contact with Marius and Nikki Basson to erect additional dust bucket stations on their farm where requested.

Baseline establishment and monitoring of groundwater rest levels and groundwater quality

The owners of Farm Omakapu further requested the groundwater levels on their farm be monitored as part of establishing the Project’s baseline. They further suggested that pump tests be conducted to ensure that the borehole yields are accurately documented to track the Project’s ongoing effect on groundwater levels. This will assist in guaranteeing that the groundwater levels of Farm Omitiomire and the surrounding farms are maintained according to pre-mining activity levels post-closure.

Similarly, they recommended additional monitoring boreholes be drilled on Farm Omitiomire and the surrounding farms to monitor groundwater quality. ECC has commissioned a groundwater study to assess the groundwater network and conduct pump testing. As part of the baseline establishment for the ESIA and to provide the basis for future monitoring work once the operation of the mine has commenced, ECC conducts monthly monitoring of groundwater rest levels and

quarterly monitoring of groundwater quality. The drilling of test/monitoring boreholes is standard practice on any mine site to monitor groundwater quality and levels.

3 DRAFT SCOPING REPORT - COMMENTS AND RESPONSES

Table 2 – Comments and feedback from the scoping report public review period received from: Marius and Nikki Basson, Farm Okamapu No. 104

Comment	EAP/Proponent Response
<p>We need a dust bucket to be installed at the main lodge building per our initial correspondence sent to you, the one installed this week is in our Game Camp closest to the Omitiomere border.</p>	<p>Comment noted and we will be in contact with you.</p>
<p>In addition to the dust bucket at the lodge, we would also like to request the installation of dust buckets next to the main gravel road the mine vehicles will use. These buckets need to be installed directly next to the road and not 200m away as the dust will obviously be far less by the time it reaches the bucket</p>	<p>Comment noted, this will be assessed as part of the traffic and road study. Additional monitoring sites will be added where necessary.</p>
<p>We are concerned with the manner in which the water levels are being tested. The mining company needs to establish a baseline and draw down cone for the entire areas underground water. This means the mine has to test the yield of the boreholes on the farms i.e. you need to install your own equipment in the farmers borehole and then pump the water in the borehole for at least 24 hours to determine the litres of water supplied per hour. This needs to be the same before the mining operations start and when operation ceases. If my borehole delivers 10 000L/hour before operation it needs to do so at the end. This has to be done for all parties who's water supply can be negatively impacted by these mining operations. Furthermore you need to drill additional test boreholes on these farms as well as on Omitiomire to establish a proper baseline and guarantees need to be made that you will restore the quality and quantity of water to the parties negatively affected by the mining operations. We are happy to supply you with a contract/agreement that the mine can use in this regard</p>	<p>ECC has commissioned Knight Piesold to conduct the groundwater and river diversion study, part of this study is to review the groundwater network and conduct pump testing. As part of our baseline establishment and to provide the basis for future monitoring work once the operation of the mine has commenced, ECC conducts monthly monitoring of groundwater rest levels and quarterly monitoring of groundwater quality.</p> <p>Knight Piesold have drilled 4 test pumping holes on Omitiomire Farm and undertaken extensive test pumping.</p> <p>The drilling of test/monitoring boreholes is standard practice on any mine site to monitor groundwater quality and levels.</p>

Comment	EAP/Proponent Response
<p>On page 67 of ECC report no 134-394-REP you mention that baseline environmental monitoring of ground level water is being carried out, can you describe where and how this is being done? No tests are being conducted on our farm.</p>	<p>Trained environmental practitioners from ECC conduct on-site monitoring on a monthly basis of groundwater levels. Groundwater rest water levels are measured by using a groundwater dip meter, which has a weight attached to the end of a measuring tape. Once the weight touches the water, a beeping noise will be heard to alert the EP that the rest water level has been reached and the measurement can be recorded. Monitoring on your farm will be discussed with the Proponent and is now being carried out. Monthly water level monitoring is also being undertaken on farms Ekuja, Omitiomire, Ojereand Lindenhof.</p>
<p>On page 67 of ECC report no 134-394-REP you mention that ambient air quality is being monitored, where is the device to monitor the air quality installed? In our initial correspondence, we also requested that a device be installed at our lodge to monitor the air quality on an ongoing basis as we operate in the tourism industry. Can we have a discussion in this regard?</p>	<p>Comment noted and we will be in contact with you. A dust monitoring installation has been installed at the lodge house.</p>

Table 3 - Comments and feedback from the scoping report preliminary environmental management plan public review period received from: Karl Lichtenberg after the I&AP registration period (18 June 2023).

***Text in bold has been taken from the preliminary environmental management plan to give context to the questions asked.**

Comment	EAP/Proponent Response
<p>Missing Impact of river rerouting on biodiversity:</p> <p>Habitat Loss: Rerouting a river often involves altering the natural course of the water, which can lead to the destruction or alteration of existing habitats. This can result in the loss of important habitats for various species, including aquatic organisms, plants, and animals that rely on the river and its surrounding areas for survival.</p> <p>Disruption of Aquatic Ecosystems: Rivers support complex aquatic ecosystems with interconnected food chains and diverse species. Rerouting a river can disrupt these ecosystems by changing the flow patterns, water temperature, and nutrient distribution. This disruption can lead to declines in fish populations, including migratory species that rely on specific river conditions for their life cycles.</p> <p>Fragmentation: Rerouting a river can create physical barriers and fragment habitats. When a river is diverted or dammed, it can isolate populations of species on either side, limiting gene flow and reducing genetic diversity. Fragmentation can also impede the movement of aquatic organisms, such as fish, affecting their ability to migrate, find food, and reproduce.</p>	<p>All potential impacts from the river diversion will be assessed and discussed in the assessment report, this is only the scoping phase that sets the scope of the assessment to be completed. Your comments are duly noted and will be taken forward into the assessment phase.</p>

Comment	EAP/Proponent Response
<p>Changes in Water Quality: Altering the course of a river can impact water quality. Rerouting may lead to changes in sediment distribution, nutrient levels, and oxygen content, potentially affecting the survival of aquatic organisms and altering the overall ecological balance.</p> <p>Loss of Riparian Zones: Rivers are often surrounded by riparian zones, which are important transitional areas between land and water. These zones support a variety of plant and animal species and provide critical habitat, food sources, and breeding grounds. Rerouting a river can result in the loss or degradation of these riparian zones, leading to a decline in biodiversity.</p> <p>Cascading Effects: The impacts of rerouting a river can have cascading effects on the surrounding ecosystems. For example, changes in water flow can affect wetlands, floodplains, and other interconnected habitats, disrupting the entire ecological network and potentially causing further species decline.</p>	
Impact of noise and light pollution on biodiversity missing	All potential impacts from noise and light will be assessed and discussed in the impact assessment phase.
Climate (CO ₂) pollution and impact on fauna and flora caused by increased traffic by all vehicles heading towards and leaving the mine site.	All potential impacts from CO ₂ will be assessed and discussed in the impact assessment phase.
Mitigation for ground water levels would be to fill up the mine at the end of the operation and reestablish the river to its original drainage line	This will be addressed in the impact assessment phase and final environmental management plan once specialist studies have been completed.
How can this (poaching) be effectively be prevented?	This will be fully addressed in the final environmental management plan.

Comment	EAP/Proponent Response
There also should be adequate technical and personell means on site to effectively combat fire, should firebreaks fail, Implement a strict no smoking policy.	Comment noted.
How can this (illegal collection of veld food, collecting wood) effectively be prevented?	This will be fully addressed in the final environmental management plan.
How would this (banning domestic pets) be enforced?	This will be fully addressed in the final environmental management plan.
How would this (planting of invasive alien plant species) be enforced?	This will be fully addressed in the final environmental management plan.
Is this (Ensure all trenches are backfilled upon completion and when open clearly marked and with protective berms or fencing to prevent access) for mining or waste? Waste should not be left on site in any form or kind to prevent leakage into the environment. All waste should be removed to a zoned and registered landfill.	This is an error as it is unlikely that the Proponent will utilise trenching.
How can this (Progressive rehabilitation during the mining phase) be enforced?	This will be fully addressed in the final environmental management plan and the Proponent's mine closure plan.
How can this (Stick to speed limits) be enforced? Speed humps to not seem a adequate solution for gravel roads rather technically limit all vehicles used in this phase to a adequate speed.	Trackers can be placed in all mining vehicles to ensure that speeds are constantly tracked and alerts are sent to management as soon as speed limits are broken and disciplinary action will be taken against offenders. Speed humps would be for the mine site not on external gravel roads.

Comment	EAP/Proponent Response
<p>The water table should be monitored at the site, as water may drain in but also regularly on agreed upon points in a 50km radius. (With regards to potential issues or impacts under table 6 pg. 34)</p>	<p>This will be fully addressed in the final environmental management plan.</p>
<p>how can this (water-saving measures) be enforced? At a minimum watermeters should be installed where ever possible.</p>	<p>Water saving is conducted as part of the mining process, such as covering ponds of open water to prevent evaporation, water is reused and recycled including the effluent from accommodations. This will be fully addressed in the final environmental management plan.</p>
<p>All personell should additionally be dewormed, as this (Use of the portable chemical toilets instead of the veld must be strictly adhered) cannot be effectively enforced.</p>	<p>While it is unnecessary to require personnel to take deworming medication, personnel cannot be forced to take deworming medication. Measures will be implemented to enforce the use of toilets and prevent defecation in the veld, however your comment is noted.</p>
<p>How can this (re-use of water during the construction and operational phases) be enforced? Adequate facilities have to be set up to ensure collection of reusable water - -> architecture should always account for collection of reusable water.</p>	<p>This will be fully addressed in the final environmental management plan.</p>
<p>Use of mine sump should be minimilized as this will impact ground water levels.</p>	<p>This will be addressed in the assessment report and final environmental management plan once specialist studies have been completed.</p>
<p>All data on water consumption, water levels, accidents, road kills, spills etc (all impacts on the environment) where possible should be made available to the public (water usage/ground water levels for example can be made available in real time on a webpage)</p>	<p>Comment noted.</p>


Comment	EAP/Proponent Response
<p>(Based on all plant and surface infrastructure (including the waste rock dumps/tailings storage facilities) to be designed and constructed according to national standards and applicable legislative requirements, to prevent surface water and groundwater contamination) international standards, if those are more stringent</p>	<p>Applicable legislative requirements will be used and where these are deemed inadequate international standards will be used</p>
<p>This is not a good policy (Dewatering of the mine may be necessary; if suitable this water can either be used in the processing plant or pumped into drainage lines of the catchment downstream of the infrastructure (non-contact water). Pumping water into the drainage lines downstream will mean a lot of this water will evaporate and impact on groundwater levels will increase due to underground erosion. If possible water should be pumped into boreholes or should be made available to surrounding communities/ businesses whose groundwater is negatively impacted.</p>	<p>This will be addressed in the impact assessment report and final environmental management plan once specialist studies have been completed.</p>
<p>How will this (impact of mining and any dewatering on the surrounding aquifers will be monitored and reported on) be monitored? Results should be made available publically in real time</p>	<p>Trained environmental practitioners will conduct on-site monitoring on a monthly basis. Groundwater rest water levels will be monitored to assess abstraction rates and groundwater levels</p>
<p>Appointed members of the surrounding communities should have the right to participate in monitoring activities.</p>	<p>Comment noted, and the EAP will work with the proponent to establish such a platform. A community forum will be held quarterly whereby monitoring data will be presented and discussed with neighbours and community stakeholders.</p>
<p>Air Quality should be measured and made available to the public in real-time, for example via website.</p>	<p>Comment noted, Air quality is already being monitored on-site. The EAP will work with the proponent to establish such a platform. A community forum will be held</p>

Comment	EAP/Proponent Response
	quarterly whereby monitoring data will be presented and discussed with neighbours and community stakeholders.

4 ACKNOWLEDGEMENTS

Through the ESIA process, the Proponent and ECC have endeavoured to provide a platform to hear and address all relevant comments put forward by I&APs. ECC would like to thank the I&APs and stakeholders for providing feedback during the scoping phase of the ESIA process. We acknowledge and appreciate the time required to review these documents and ECC genuinely appreciate the input provided by I&APs. The valuable feedback received during the scoping report phase of the ESIA process will ensure a robust impact assessment is submitted to the relevant authorities for a record of decision to be made. ECC acknowledges that constructive feedback results in an improved ESIA and a project that is understood by the community and I&APs.

APPENDIX A – ORIGINAL COMMENTS RECEIVED

FW: NOTICE OF THE PUBLIC REVIEW PERIOD FOR THE SCOPING REPORT AND ENVIRONMENTAL MANAGEMENT PLAN FOR **OMITIOMIRE**  
COPPER MINE ON ML 197 IN THE KHOMAS REGION, NAMIBIA External Inbox x



→ **Nikki Basson**
to me, Lichtenberg, Drikus, Holger, TH, kataneno@iafrica.com.na ▾

Sun, Jun 11, 7:47 AM (5 days ago) ☆ ↶ ⋮

Good day,

Thank you for the documentation and the installation of the dust bucket and the measuring of the borehole level on Farm Okamapu No 104, we would now like to bring the following to your attention:

1. We need a dust bucket to be installed at the main lodge building per our initial correspondence sent to you, the one installed this week is in our Game Camp closest to the Omitiomere border.
2. In addition to the dust bucket at the lodge, we would also like to request the installation of dust buckets next to the main gravel road the mine vehicles will use. These buckets need to be installed directly next to the road and not 200m away as the dust will obviously be far less by the time it reaches the bucket.
3. We are concerned with the manner in which the water levels are being tested. The mining company needs to establish a baseline and draw down code for the entire areas underground water. This means the mine has to test the yield of the boreholes on the farms i.e. you need to install your own equipment in the farmers borehole and then pump the water in the borehole for atleast 24 hours to determine the litres of water supplied per hour. This needs to be the same before the mining operations start and when operation ceases. If my borehole delivers 10 000L/hour before operation it needs to do so at the end. This has to be done for all parties who's water supply can be negatively impacted by these mining operations. Furthermore you need to drill additional test boreholes on these farms as well as on Omitiomere to establish a proper baseline and guarantees need to be made that you will restore the quality and quantity of water to the parties negatively affected by the mining operations. We are happy to supply you with a contract/agreement that the mine can use in this regard.
4. On page 67 of ECC report no 134-394-REP you mention that baseline environmental monitoring of groundlevel water is being carried out, can you describe where and how this is being done? No tests are being conducted on our farm.
5. On page 67 of ECC report no 134-394-REP you mention that ambient air quality is being monitored, where is the device to monitor the air quality installed? In our initial correspondence we also requested that a device be installed at our lodge to monitor the air quality on an ongoing basis as we operate in the tourism industry. Can we have a discussion in this regard?

Many thanks

Marius & Nikki Basson

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