



ECC
ENVIRONMENTAL
COMPLIANCE CONSULTANCY



ECC-103-332-NTS-7-A

BACKGROUND INFORMATION DOCUMENT

TWIN HILLS GOLD MINE PROJECT

STAKEHOLDER ENGAGEMENT

PREPARED FOR

OSINO RESOURCES (PTY) LTD (OSINO GOLD EXPLORATION & MINING (PTY) LTD)

OSINO
RESOURCES

AUGUST 2021

TABLE OF CONTENTS

1.	PURPOSE OF THIS DOCUMENT	3
2.	DESCRIPTION OF PROPOSED PROJECT	4
2.1	INTRODUCTION.....	4
2.2	MINE LOCATION & ENVIRONMENT WITHIN THE MINING LICENCE AREA.....	4
2.3	EXPLORATION AND PROJECT PROGRESS	4
2.4	WHY IS THE PROJECT NEEDED.....	8
2.5	CONSTRUCTION AND OPERATION PHASES.....	8
3.	CONSIDERATION OF ALTERNATIVES	13
4.	THE ENVIRONMENTAL SOCIAL IMPACT ASSESSMENT PROCESS	14
4.1	SCREENING.....	16
4.2	SCOPING PHASE	18
4.2.1	BASELINE STUDIES	18
4.2.2	TERMS OF REFERENCE	19
4.2.3	STAKEHOLDER ENGAGEMENT	19
4.2.4	SCOPING REPORT	19
4.3	ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENT PHASE	19
4.3.1	POTENTIAL IMPACTS.....	19
4.3.2	ASPECTS TO BE ASSESSED	20
4.3.2	METHODOLOGY (BASELINE STUDIES & ASSESSMENT).....	21
4.3.3	DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN	23
5.	THE WAY FORWARD - PUBLIC PARTICIPATION AND ADVERTISING.....	23

BACKGROUND INFORMATION DOCUMENT
OSINO RESOURCES' TWIN HILLS GOLD MINE PROJECT
KARIBIB DISTRICT, ERONGO REGION, NAMIBIA

1. PURPOSE OF THIS DOCUMENT

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 Social Impact Assessment (ESIA) process.

All those who register as an I&AP 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 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
- Next steps and the way forward.

2. DESCRIPTION OF PROPOSED PROJECT

2.1 INTRODUCTION

Environmental Compliance Consultancy (ECC) has been appointed by Osino Resources Corporation (a Canadian registered company) and Osino Namibia Holdings (Pty) Ltd (Holding company of Osino Gold Exploration and Mining (Pty) Ltd) (Namibian registered companies) to act on their behalf for the environmental clearance certificate application for the proposed mining activities for base and rare metals, and precious metals in the Karibib District, Erongo Region, Namibia. The mining project will be commonly known to the public as Twin Hills Gold Project.

Osino Gold Exploration and Mining (Pty) Ltd (hereafter referred to as OGME or The Proponent), is the official applicant for the mining project and environmental clearance application. Previous exploration activities have identified extensive gold mineralization, defined precious metals reserves and resources (especially gold) and extensive development studies which have culminated in a feasibility study and economic analysis for the project, referred to as the Twin Hills Gold Project ("Twin Hills" or "the Project"). Twin Hills is proposed as a conventional truck & shovel open-pit with carbon-in-leach metallurgical processing route which is very similar to the other two gold mines in Namibia, Otjikoto and Navachab. The Twin Hills Gold Project comprises numerous EPL's is rapidly being fast-tracked to development. An important next step is the application for a mining license which will secure the licensing position and tenure of the project, thereby enabling Osino to continue to develop the project into an operational, large-scale gold mine. The planned project involves developing the current exploration activities on EPLs 5196, 6167, 5658, 6953, 3739 and 7301 into full scale gold mining operation. The exploration phase defined the gold ore deposits within the exploration licenses as rendered in the map in **Figure 1**.

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. The mining activity triggers the listed activities as per the Environmental Management Act Regulations. The relevant activities list provided later in the BID. Environmental Compliance Consultancy (ECC) will undertake an ESIA and draft an Environmental Management Plan (EMP).

2.2 MINE LOCATION & ENVIRONMENT WITHIN THE MINING LICENCE AREA

The proposed project is located near the regional town of Karibib (-21° 55' 59.99" S : 15° 49' 59.99" E) and is approximately 140 km directly northwest of the capital, Windhoek, 32 km east of Usakos, and 66 km south of Omaruru (see **Figure 2**).

The site is accessed via the B2 main road from Windhoek towards Karibib and along the C33 road from Karibib to Omaruru. Images of the various vegetation types and habitats within the mining licence area are rendered below in **Figure 3**.

2.3 EXPLORATION AND PROJECT PROGRESS

Osino started prospecting across the deep seated Karibib faultline and during 2019 Osino started developing the Twin Hills Gold Project. This discovery was a result of 18 months of surface geochemical and geophysical exploration that defined a series of targets for shallow percussion drilling. The shallow percussion drilling and diamond drilling confirmed the presence of gold in bedrock. The Twin Hills central discovery is entirely covered with sand and calcrete of an approximate range of 2 – 25m thick. During the 2019 period, a total of 31 drill holes were completed, amounting to approximately 6,000m of drilling. An additional 20,000m of drilling was carried out for 2020, which was sufficient to define a maiden Mineral Resource Estimation (MRE) in early 2021. The Mineral Resource Estimation (MRE) was used to plan further drilling for 2021 and to carry out a Preliminary Economic Assessment (PEA) by July this year.

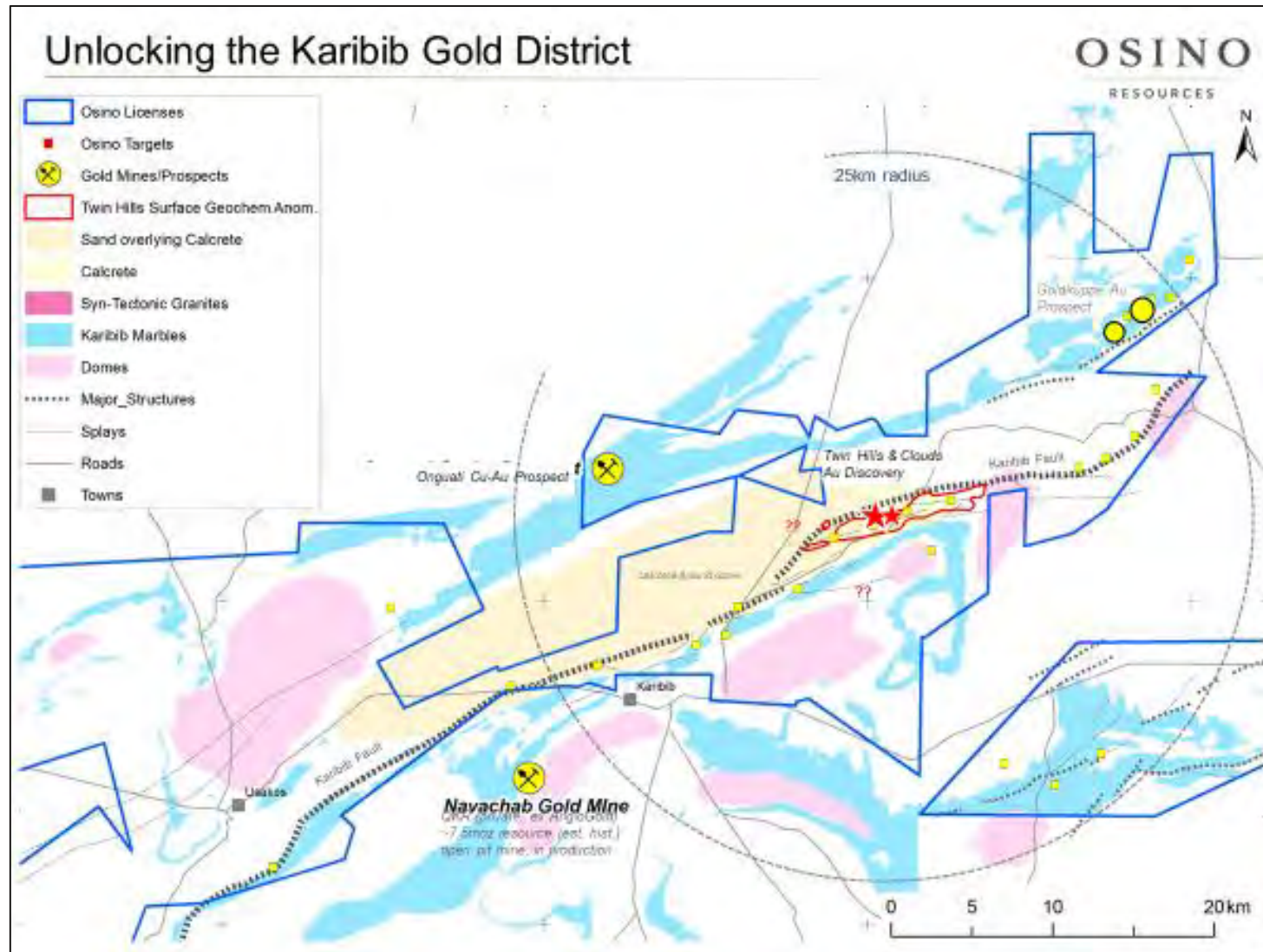


Figure 1. Extent of the Exploration Undertaken by Osino Gold Exploration and Mining (Pty) Ltd

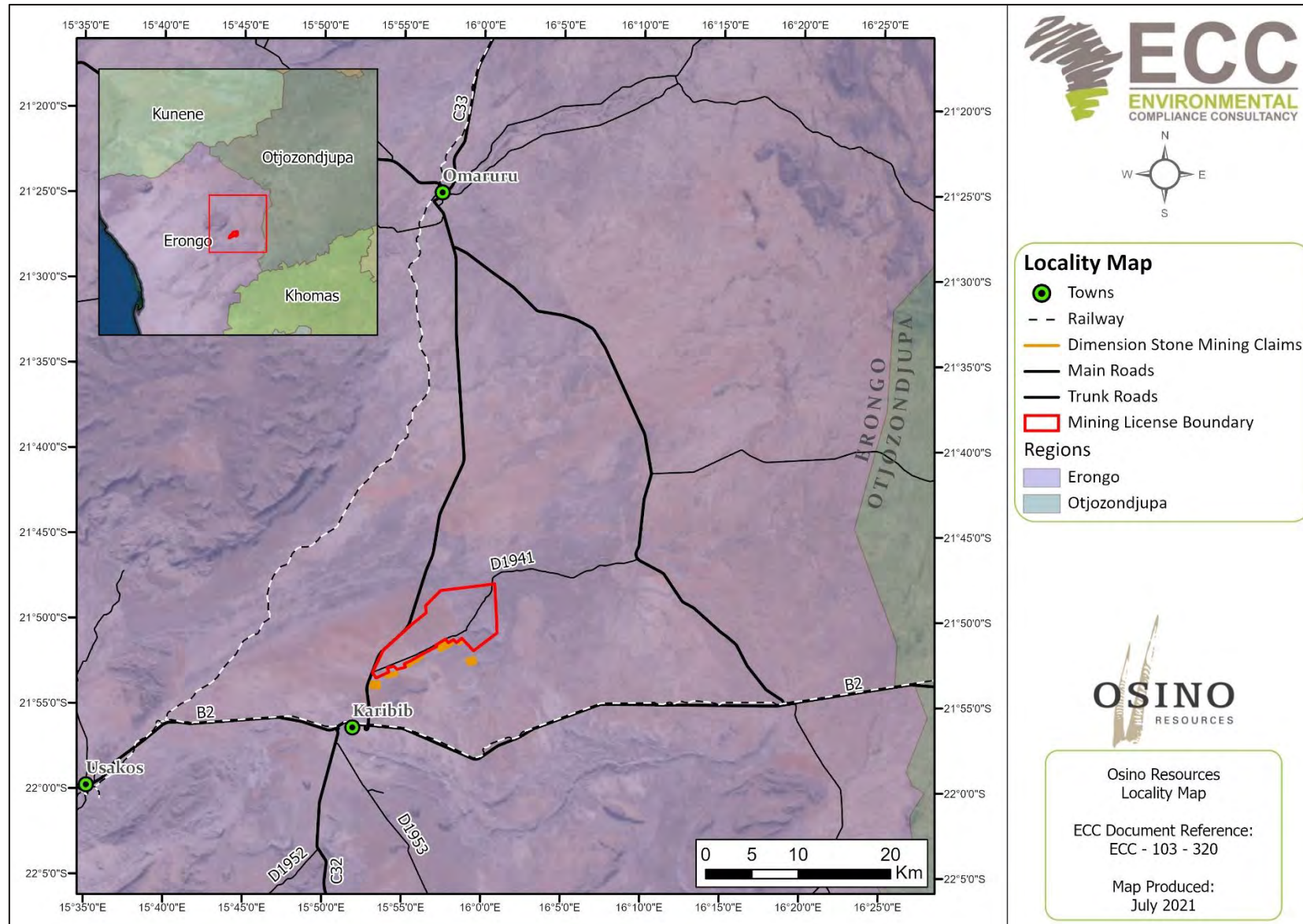


Figure 2. Location Map of the Mining Licence Area

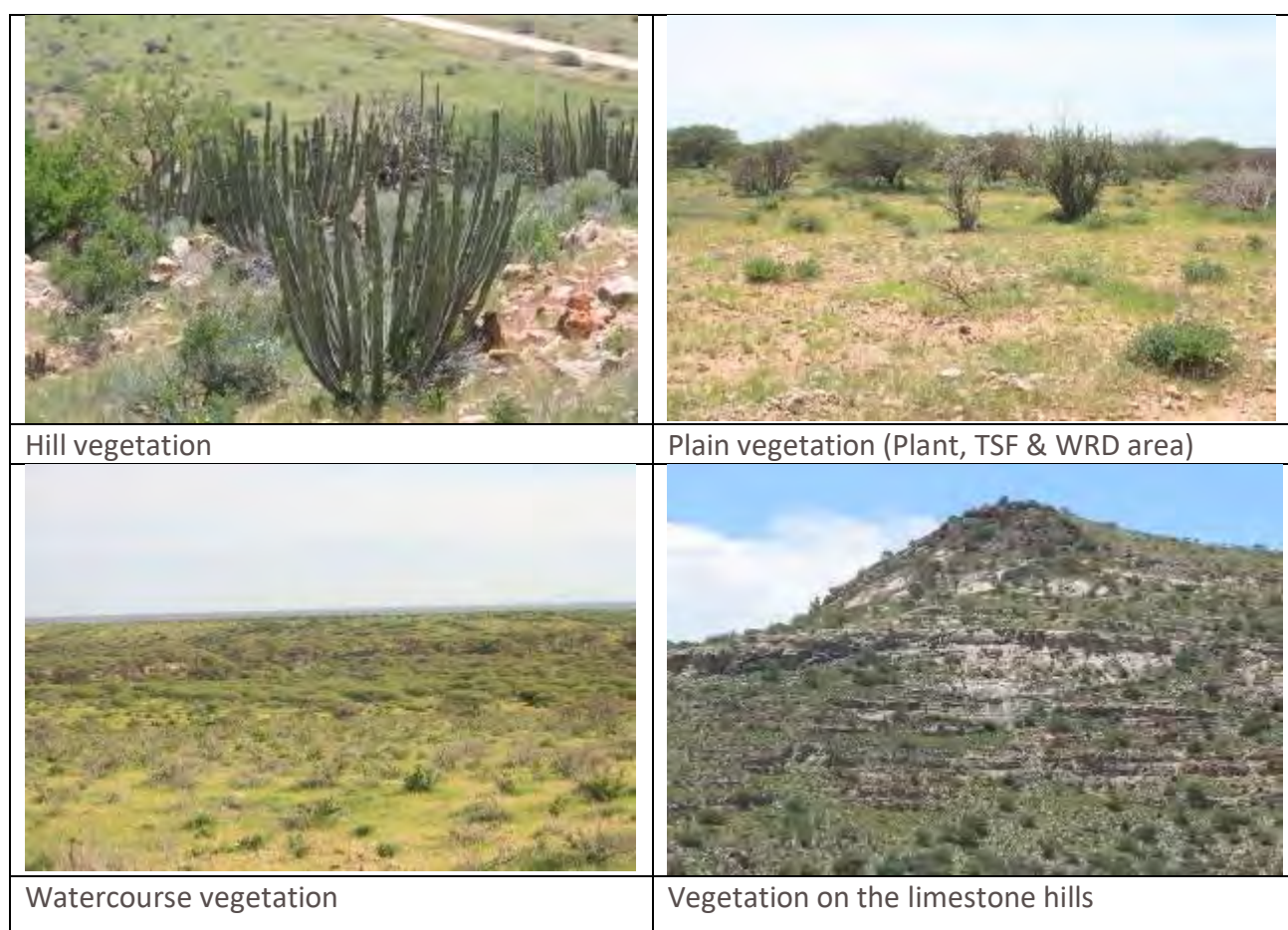


Figure 3. Images of the habitats and vegetation within the mining licence area

2.4 WHY IS THE PROJECT NEEDED

Osino intends to pursue mining activities with the aim of retrieving gold out of these new mining prospects. These new mining activities could contribute to the national and local economies. This new mine will have a tremendously positive impact on the country's economy.

2.5 CONSTRUCTION AND OPERATION PHASES

It is envisaged that the mining operation at Twin Hills Gold Project will be similar to that of B2Gold Otjikoto and QKR Navachab gold mines. The estimated production at the Twin Hills Gold Mine will be approximately 3 million tonnes of ore which equates to approximately 100,000 ounces of gold per year. The plan and vertical view of the current mining design and resource definition is rendered in **Figure 4**.

Mining of the open pit will be conventional drill and blast, with ore and waste rock being shovelled and transported by a fleet of mobile equipment. Waste rock will be trucked to a waste rock dump, and the ore will be sent to the plant for crushing, cyanide leaching, carbon-in-pulp (CIP) processing, electrowinning and then smelting in an induction furnace to produce gold bars. **Figure 5** renders a chart of the process from mining, processing to mineral waste and final product.

The proposed mining activities are generally high-impact and intrusive. The footprint of the proposed mine licence area is rendered in the map of **Figure 6**. This same map shows the location

of the various site components. The proposed mining licence area will consist of an open pit processing plant that will include a primary- and secondary crusher, a Waste Rock Dump (WRD), and a Tailings Storage Facility (TSF), with the following activities taking place on-site:

- Construction of access tracks and roads, where existing tracks cannot be utilised for the fleet of mobile equipment. The roads are essential due to regular vehicular movement;
- Vegetation clearing for the creation of tracks, open-pit mine and survey access;
- Ongoing ground exploration activities may include soil sampling, geological mapping, geophysical surveys, drilling and drill-core sampling, and blast of the open-pit mine.
- Construction of the plant infrastructure, as well as the infrastructure for fuel and chemical storage;
- Crushing and screening of the ore; and
- Water recycling and dust suppression

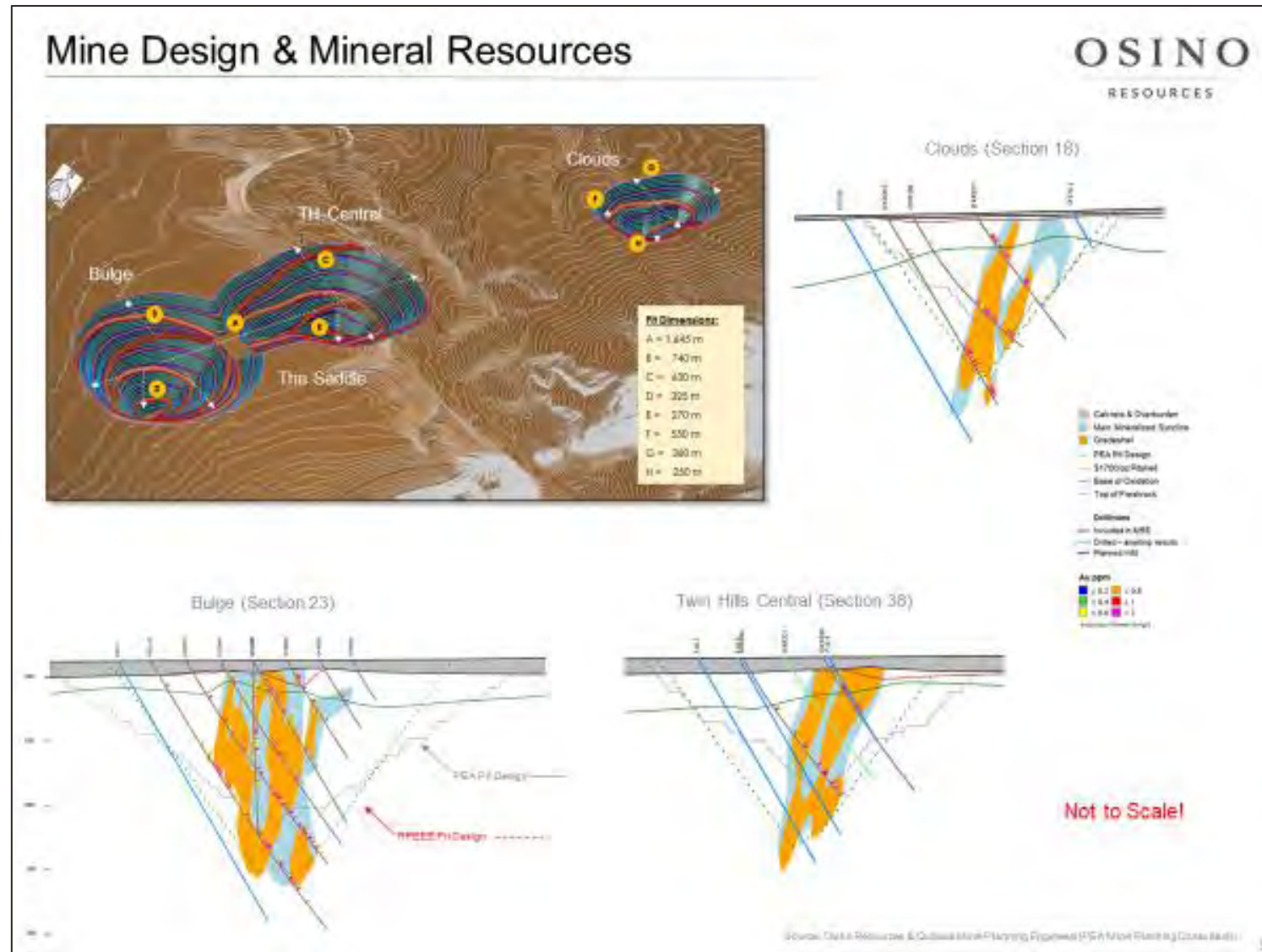


Figure 4. Mining Design and Resource Definition of the Areas within the Mining Licence Area

Metallurgical Process Plant Layout

OSINO
RESOURCES

Optimal circuit layout is 3-stage crushing followed by ball-milling, pre-oxidation and CIL with electrowinning & smelting. Dry stack tailings deposition (likely co-disposal with waste rock) after detox, thickening & filtration.

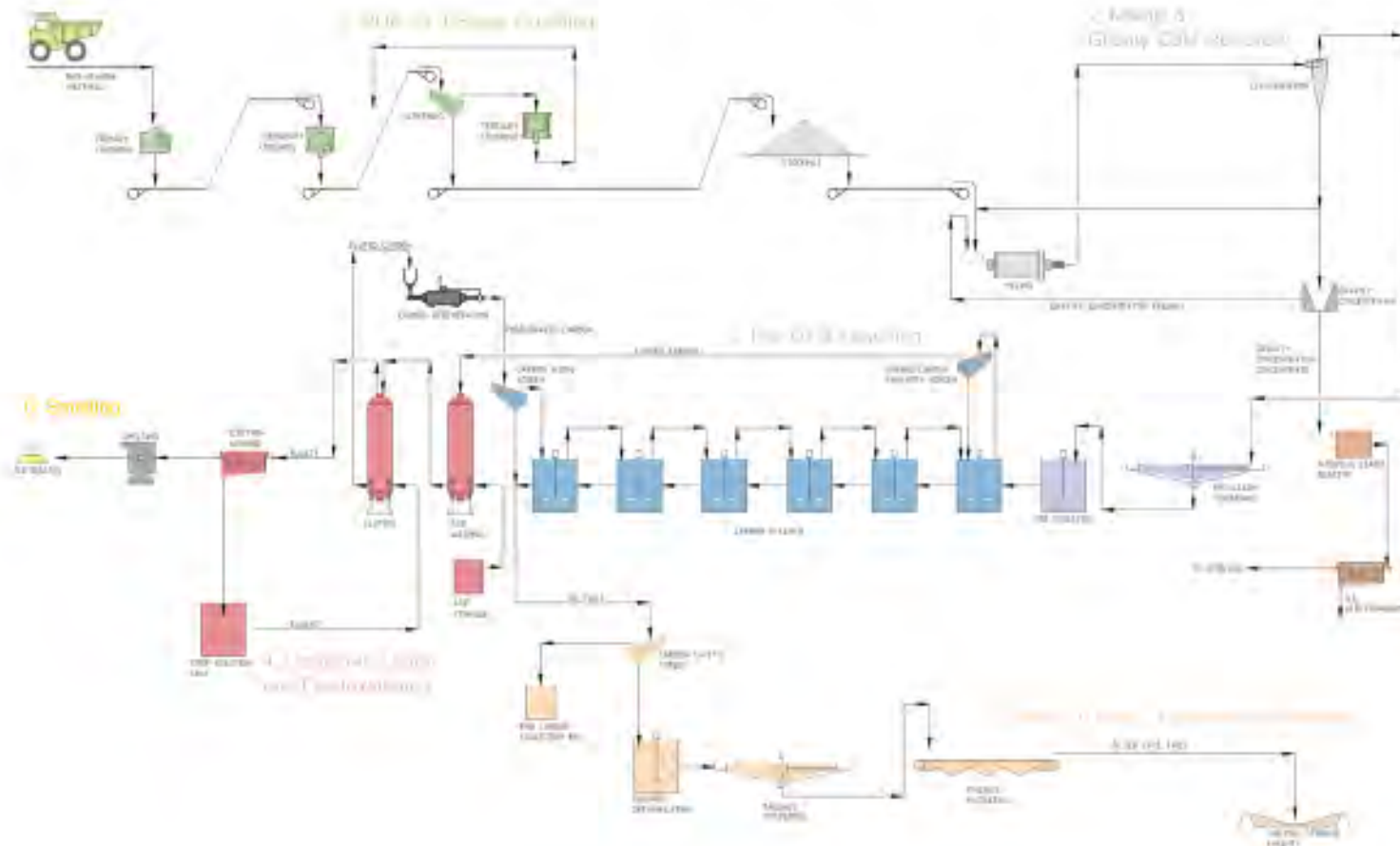


Figure 5. Metallurgical Process Flow from Mining to Product and Mineral Waste

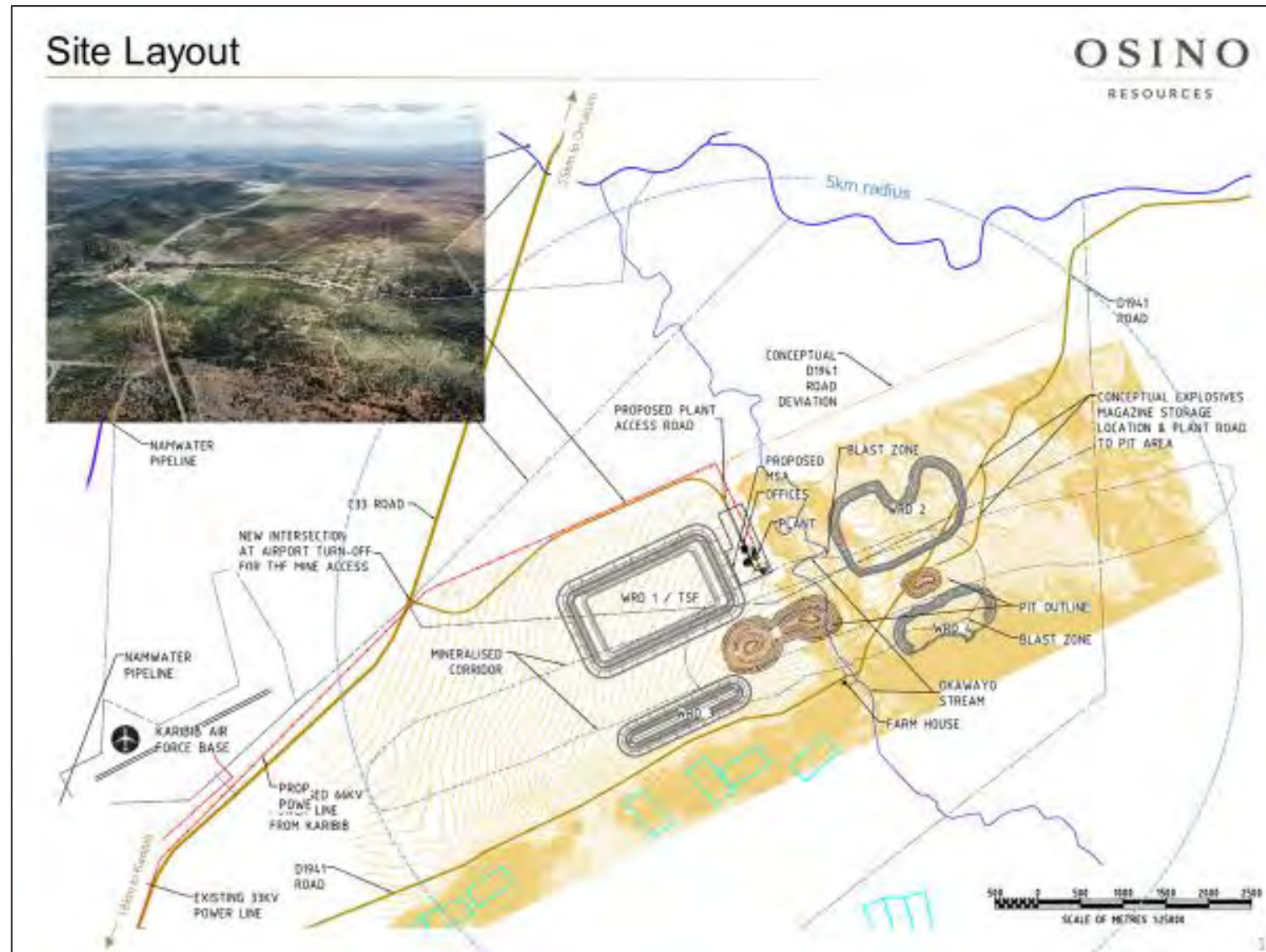


Figure 6. Mine Layout with Linear Infrastructure and Options for Waste Disposal Sites

3. CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed project. During the assessment phase, alternatives will be considered and assessed. The alternatives will aim to optimize designs and processes to reduce potential impacts. Here are some aspects where alternatives may be required:

- Different types of technology or operation,
- Route access; and
- Mining methods.

The key aspects that have already been identified where alternatives need to be considered are TSF and WRD locations, alternative plant layouts, tailings deposition techniques, as well as the use of machinery that are not as noisy.

4. THE ENVIRONMENTAL SOCIAL IMPACT ASSESSMENT PROCESS

The ESIA for the proposed project is being conducted by ECC and was undertaken in terms of the Environmental Management Act, 2007 and its regulations. The process followed for this ESIA is set out in the flowchart in Figure 7.

Osino currently holds the following Exclusive Prospecting Licences (EPLs) with approved Environmental Management Plans (EMPs):

Table 1. EPL licence periods

LICENCE	STATUS
EPL 5196	09/04/2014 to 08/04/2021
EPL 6167	23/02/2017 to 22/02/2022
EPL 5658	23/09/2014 to 19/10/2022
EPL 6953	13/06/2018 to 12/06/2021
EPL 3739	11/09/2011 to 15/05/2021
EPL 7301	12/11/2020 to 11/11/2023

The planned mining licence area for the Twin Hills Gold Mine lies mainly within EPL 7301. Exploration will continue within all of the EPLs with the potential that mining will extend to these EPL areas if viable resources are discovered. ECC has been commissioned by Osino as the independent Environmental Assessment Practitioner (EPA) to facilitate the whole ESIA process.

Prior to the start of the proposed mining project, environmental clearance is required 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 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);
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 draft Environmental Management Plan (EMP) and submission to the appropriate competent authorities.

In simple terms, the main objectives of the ESIA are to:

- Provide information describing the planned Twin Hills Gold Mine project and associated activities;
- Provide an independent environmental assessment of the activities associated with the proposed mining project; and
- Develop management and mitigation measures associated with any identified potential impacts where necessary.

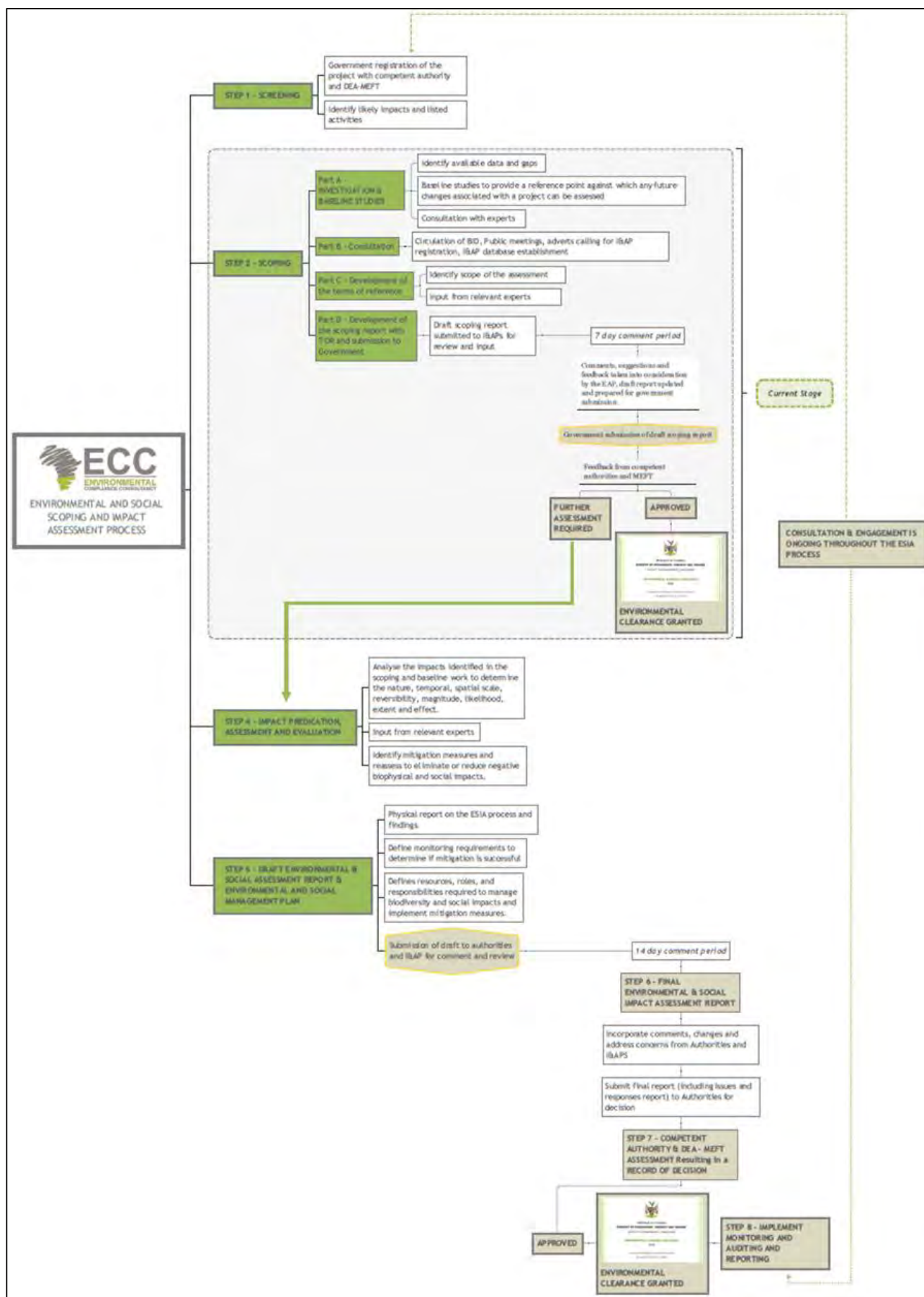


Figure 7. Flowchart of the Environmental Assessment Process

4.1 SCREENING

A review of the planned project was undertaken and the screening findings against the listed activities was conducted; the findings of which are summarised below:

TABLE 1: LISTED ACTIVITIES TRIGGERED BY THE PROJECT INCLUDE:

LISTED ACTIVITY	EIA SCREENING FINDING
ENERGY GENERATION, TRANSMISSION AND STORAGE ACTIVITIES (1.a) The construction of facilities for the generation of electricity. (1.b) The construction of facilities for the transmission and supply of electricity.	– The mine will connect to the Nampower grid. – There is a possibility that a solar power station will be constructed for the generation of electricity. – The electricity that is generated will be used to supply electricity to the mine and potential surplus redirected into the grid power system.
WASTE MANAGEMENT, TREATMENT, HANDLING, AND DISPOSAL ACTIVITIES (2.1) The construction of facilities for waste sites, treatment of waste and disposal of waste. (2.2) Any activity entailing a scheduled process referred to in the Atmospheric Pollution Prevention Ordinance, 1976. (2.3) The import, processing, use and recycling, temporary storage, transit or export of waste.	– Facilities for disposal of waste generated by site will need to be constructed. – The activity that is listed in the Environmental Management Act, No. 7 of 2007 (2.2) referred to (58) in the Atmospheric Pollution Prevention Ordinance, 1976. The bulk storage and handling of ore: That is to say, the storage and handling of metallic ore at dumps designed to hold 100 000 metric tons or more, which are not situated on the premises of a mine or works as defined in the Mines, Works and Minerals Ordinance, 1968 (Ordinance 20 of 1968). –
MINING AND QUARRYING ACTIVITIES (3.1) The construction of facilities for any process or activities which requires a license, right or other form of authorization, and the renewal of a license, right or other form of authorization, in terms of the Minerals (Prospecting and Mining Act), 1992. (3.2) Other forms of mining or extraction of any natural resources whether regulated by law or not. (3.3) Resource extraction, manipulation, conservation and related activities.	– This listed activity, infers the provisions of the Minerals Act (Prospecting and Mining) Act 33 of 1992, under different licences as the basis upon which certain activities qualify for an EIA. The Minerals Act (1992) defines mining activities under the lawful ownership of a mining licence (ML). A mining licence includes any mining activities. – The resource in this case gold, will be extracted, then processed in the plant eventually producing gold bars.
FORESTRY ACTIVITIES	– Vegetation clearing may be required for

LISTED ACTIVITY	EIA SCREENING FINDING
(4) The clearance of forest areas, deforestation, a forestation, timber harvesting or any other related activity that requires authorisation in term of the Forest Act, 2001 (Act No. 12 of 2001) or any other law.	tracks and the construction of access roads, and possibly for the setup of the, thickener, filter press and disposal facility of tailings.
WATER RESOURCE DEVELOPMENT (8.1) The abstraction of ground or surface water for industrial or commercial purposes. (8.2) The abstraction of groundwater at a volume exceeding the threshold authorized in terms of a law relating water resources. (8.4) Construction of canals and channels including the diversion of the normal flow of water in a riverbed and water transfer schemes between water catchments and impoundments. (8.5) Construction of dams, reservoirs, levees and weirs. (8.6) Construction of industrial and domestic wastewater treatment plants and related pipeline systems. (8.9) Construction and other activities within a catchment area.	– Ground and surface water may be abstracted, or sourced for the operation. – The sourced groundwater may likely exceed the threshold authorized in terms of the Water Act, and therefore permits for abstraction must be sourced. – An ephemeral river runs through a section of the planned open-pit, thus a strategy is required to assess the management of this potential interaction. – There is a possibility of the construction of a dam and the water will be used for the plant. – Pipeline systems will need to be constructed to transport the water to the plant from the dam. – The mining area is within a catchment area.
HAZARDOUS SUBSTANCE TREATMENT, HANDLING AND STORAGE (9.1) The manufacturing, storage, handling or processing of a hazardous substance defined in the Hazardous Substances Ordinance, 1974. (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.	– The storage, handling and processing of the hazardous substances including cyanide that will be required in the processing plant. – Licences will be obtained for all hazardous substances that will need to be stored on the site. –

LISTED ACTIVITY	EIA SCREENING FINDING
(9.4) The storage and handling of a dangerous goods, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters at any one location.	
INFRASTRUCTURE (10.b) The construction of public roads. (10.g) The construction of communication networks including towers, telecommunication and marine telecommunication lines and cables. (10.j) i) The construction of masts of any material or type and of any height, including those used for telecommunication broadcasting and radio transmission, but excluding flag poles; and ii) Lightning conductor poles.	– A new road may need to be constructed from C33 to D1941, as road D1941 is currently located in the center of the proposed open-pit area. – Towers for communication will need to be constructed, thus cables and telecommunication lines will be put in place.

4.2 SCOPING PHASE

The scoping phase is important because in this phase the potential impacts that may have significance to the biophysical and social environments are identified. The appropriate available data and gaps in the literature are identified forming the starting point for the baseline studies.

4.2.1 BASELINE STUDIES

For the proposed project, baseline information will be obtained through desk-based studies and site verification. 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 proponents 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). Baseline context includes information on the location and the reasoning behind why the proposed project area was chosen. Desktop studies, field surveys and specialist studies will be used to collect data for the project. The baseline studies also give a further indication whether is any local or regional future developments that could impact the project or the impacts the project can have on the environment. The baseline context also helps receive information on uncertainties, limitations and assumptions one might have.

The baseline section for the biophysical environment focuses on eight specific topics, these topics includes: topography, hydrology and drainage patterns (surface water, groundwater, rivers, etc.), geology and soil classification, climate and meteorology, land use, landscape and visual amenity,

Terrestrial biodiversity and ecology (flora, fauna, amphibians, reptiles, avifauna, mammals) and habitat mapping.

Lastly the socio-economic section of the baseline studies helps to gain information on the governance, demographic profile, social stratification (employment, education, crime, infectious disease), occupation and livelihood (economic activities, occupations in study area, employment rates), land patterns (cultural heritage, air quality, noise and vibrations) and access to services (drinking water, sanitation, healthcare facilities etc.).

4.2.2 TERMS OF REFERENCE

Based on the stakeholder engagement through public meetings and written correspondence, and the baseline studies, the ToR for the impact assessment will be fixed.

4.2.3 STAKEHOLDER ENGAGEMENT

The general public and key stakeholders receive invitations to register as I&APs. After the presentation of the mining project and ESIA process at the public meetings a period of input will be granted for the Environmental Assessment Practitioner (EAP) to receive any additional concerns or comments. All feedback from the initial consultation will be incorporated into the scoping report.

4.2.4 SCOPING REPORT

The scoping report will be drafted and submitted to the registered I&APs for comment before being submitted to the competent authority and MEFT to inform them of the impact assessment process that will proceed. The scoping report will contain a description of the project and the bio physical and socio-economic environment, the specialist baseline studies, stakeholder engagement report and the terms of reference for the ESIA.

4.3 ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENT PHASE

4.3.1 POTENTIAL IMPACTS

The potential social and economic impacts that have been anticipated may include the following:

- Potential to unearth, damage or destroy undiscovered heritage remains;
- Potential relocation of farm residents;
- Potential regular disruptions (dust and noise) to the residents of the farms near mining site;
- Potential job creation due to the proposed project;
- Potential influx of people moving to the Karibib and Omaruru areas;
- Potential social nuisances;
- Potential regional and national economic benefits; and
- Potential increase in traffic passing and entering the mine site.

The potential environmental impacts that have been anticipated may include the following:

- Potential use of local water resources, including surface water and groundwater;
- Potential realignment of surface stream that runs through the mine site;

- Potential soil and groundwater contamination from hydrocarbon, chemical or acid mine drainage from the mining activities;
- Potential pollution of the atmosphere due to dust fallout;
- Potential biodiversity impacts and habitat alteration or loss (eg. vegetation clearing and subsequent mining activity footprint);
- Potential realignment of the existing district road;
- Potential change in landscape aesthetic value and sense of place; and
- Potential noise and vibration impacts.

4.3.2 ASPECTS TO BE ASSESSED

The following potential issues are identified and described as requiring assessment:

Aspect	Describe, Analyse, Assess Impact
Fauna and Flora	– Large and small mammal transects to determine mammal diversity in the area; – Reptile & amphibian transects (diurnal & nocturnal) to determine reptile & amphibian diversity in the area; – Bird transects to determine avian diversity in the area; and – Flora transects to determine plant diversity in the area and the impact the mine will have on the biodiversity.
Ground water	– Impact of dewatering the mine pit on groundwater levels. – Impact of hydrocarbon pollution from equipment and mining processes. – Impact of groundwater abstraction from production borehole on local groundwater levels.
Surface water	– Surface water resources pollution. – Modification of natural drainage patterns and flow: Stormwater decrease.
Air Quality	– Air pollution, dust irritation and amplified risk of health impact to third parties. – Identification of air pollution sources of pollution within the project area; – Identification of sensitive receptors in the vicinity of the project; – Analysis of collected air quality data; (ECC has a dataset (dust and weather) that is to be used that has been collected monthly) – Assessment of future areas of concern due to the project using dispersion modelling; – Evaluation of predicted pollutants concentration against regulatory standards; – Assess predicted levels against the IFC air quality guidelines

Aspect	Describe, Analyse, Assess Impact
	to determine compliance; and Based on the information, the impacts will be assessed, and mitigation and management measures will be recommended.
Noise	- Noise disturbance to third parties - Noise measurements will be carried out at key noise receptors. - All measurements are to be taken in accordance with the relevant noise regulations as well as the IFC Noise Management guidelines.
Traffic	- Impact on third party road users. - Impact on the Karibib airport that is located close to the mine, the impact on the air traffic of the airport.
Visual	Decreased visual resources for residents, recreational users, hunters and C33 and B2 road users.
Socio-Economic	- Economic impacts - Job creation and skills development - In-migration to Usakos, Omaruru and close neighbourhood such as Karibib - Community security and health
Cultural heritage	- Primary data should be collected during a pre-disturbance survey. This survey is to be conducted for the site specific study area. - The site survey should include surveying the proposed project footprint areas and potential alternative layouts.

4.3.2 METHODOLOGY (BASELINE STUDIES & ASSESSMENT)

As most impact assessments require standard baseline studies, it was the professional opinion of the EAP to initiate studies prior to the public consultation phase. Baseline studies for flora, fauna, air quality, noise, traffic, water resources and heritage (archaeology) were commissioned. The draft reports are currently being reviewed by the EAP.

The methods that were used to determine the biodiversity of the fauna and flora for the proposed area include the following: small mammal trapping was conducted by active trapping using collapsible Sherman traps. Small mammals caught were identified *in situ*, photographed, measured (when applicable to facilitate identification) and released unharmed at the site of capture. The larger mammal presence was determined by direct observations including other signs – e.g. tracks, scats, carcasses, burrows, scrapes, etc. Camera traps were set to capture

images of larger mammals in the area (if feasible). Reptile and amphibian transects were conducted during the day and night (using a gas lantern) to determine the diurnal & nocturnal reptile diversity. Reptiles & amphibians were caught using active capture technique ('reptile noosing') and identified *in situ*, photographed, measured (when applicable to facilitate identification) and released unharmed at the site of capture. Bird transects (on foot & by vehicle) were conducted during daylight hours using binoculars to ID and confirm species. The flora diversity to determine species composition was conducted using the step point method. Tree and shrub densities were determined using standard quadrates (10x10m or 20x20m – depending on the terrain (or as recommended by the specialist). Focus was on the identification of unique species in the proposed development area. Samples were collected for further identification when found to be necessary.

The methods used to determine the air quality of the proposed area included the following: Using baseline data collected on site over the past 8 months. Modelling predicted changes to air quality.

The methods that were used to determine the noise disruption within the mining area included the following: the objective of the environmental noise impact assessment will be to identify whether the noise levels from the mining activities will impact on surrounding receptors as per the IFC EHS Environmental Noise Management Standards. The results of the noise dispersion modelling will be compared to the relevant regulations to establish site thresholds. The baseline study included receptor identification and baseline noise measurements. The assessment phase includes impact quantification by means of noise dispersion modelling, and mitigation and noise control recommendations.

The methods that are used to determine the heritage of the proposed area included the following: The heritage baseline survey required compliance with Namibian national legislature, including the National Heritage Act, 2004 (Act No 27 of 2004) and the National Heritage Regulations, Government Notice (GN) 3490 of 2005. Likewise, the proposed assessment process will comply with these requirements which are also encapsulated in the IFC Performance Standard 8 Cultural Heritage.

The baseline study identified potentially significant heritage resources, as defined in Part I of the National Heritage Act, 2004. This was done through fieldwork and desktop research. Recommendations and propositions for the management or mitigation of the potential impacts will be reported on during the assessment phase.

Impacts will be assessed using the EAP's ESIA methodology. The ESIA is being conducted in terms of the Environmental Management Act, 2007 and its regulations. The EAP's methodology for impact assessments was taken from the IFC standards, in particular Performance Standard 1 'Assessment and management of environmental and social risks and impacts' (IFC 2012, 2017). The Namibian Draft Procedures and Guidance for ESIA and EMP (GRN, 2008) are also being applied. The EAP will implement international and national best practice and has over 25 years of combined ESIA experience.

In conclusion the environmental aspects and potential impacts of the planned Twin Hills Gold Mine and the associated activities will be identified and evaluated. For the most part the baseline studies provide the baseline conditions for the various environmental aspects. Where no baseline data exists the EMP will outline the aspects that need to be measured prior to construction.

4.3.3 DRAFT ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

An EMP shall be developed for the mining 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 commitments upon approval of the EMP and issuing of the clearance certificate.

5. THE WAY FORWARD - PUBLIC PARTICIPATION AND ADVERTISING

To re-iterate, 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. This project is currently at the scoping phase which includes the first phase of public engagement.

At this phase ECC will perform the following:

- Identify key stakeholders, authorities, municipalities, environmental groups and interested or affected members of the public, hereafter referred to as I&As;
- Distribute the BID for the Twin Hills Gold Mine project (this document);
- Advertise the environmental application in two national newspapers (completed);
- Place notices on-site at or near the boundary;
- Host public meetings to encourage stakeholder participation and engagement, and provide details of issues identified by the environmental practitioner, stakeholders and I&As
- Record all comments of I&As and present such comments, as well as responses provided by ECC, in the comments and responses report, which will be included in the scoping report that shall submitted with the application, and
- Circulate I&AP comments to the project team for consideration of project design.

Comments must be submitted in writing and can be emailed using the details in the contact us section below. Verbal comments at public meetings will also be recorded.

Please provide initial comments or concerns in writing by the 24th September 2021.

CONTACT US

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

**Environmental Compliance Consultancy
(ECC)**

info@eccenvironmental.com

Tel: +264 816 697 608

www.eccenvironmental.com

At ECC we make sure all information is easily accessible to the public.

Follow us online to be kept up to date: