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ADDENDUM REPORT:

I&AP COMMENTS AND RESPONSES ON DRAFT SCOPING REPORT PLUS IMPACT ASSESSMENT FOR EXPLORATION ACTIVITIES ON EPL 7574

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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 exploration activities on EPL 7574, //Kharas 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 7 days from 31st July 2023 -7th August 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.

2 SUMMARY OF COMMENTS FROM I&APS

2.1 INTRODUCTION

In accordance with the Regulations of the EMA 2007, on the 31st of July 2023, the scoping report was circulated electronically to all registered interested and affected parties (I&APs) and identified key stakeholders. Submissions received from 1 individual was collated in a separate "Comments and Responses" table that is presented in Table 1 and Table 2. Responses have been provided to all comments received.

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, and feedback, and allow genuine participation in the final phase of the ESIA process. Comments were received from Pete Morkel. The key area raised from the review of his comment can be summarised as follows:

Security

Concerns were raised about the security of livestock and farm owners. It was stressed that the increased presence of exploration workers on site may lead to poaching of endangered wildlife and flora. It was suggested that a security company be hired to control the movement of people on site, while also requiring the proponent to keep a register of work done, people involved, vehicle movements, problems, incidents to prevent theft and security issues. However, brining on a security company would further increase the number of people on site and would increase security risks and the risk of poaching. The EMP has included measures to ensure the security of farm owners and prevent poaching. Further security measures will be included in the access agreement.

Identification of sensitive targets

Concerns were raised that the proposed sampling sites would negatively impact sensitive areas with protected flora specifically on rocky outcrops and ridges and that sampling. A biodiversity study will be conducted to identify sensitive areas and thereafter the Proponent may revise the locations of their soil sampling sites. Various mitigation measures have also been included in the impact assessment report and EMP to prevent damaging or negative impacts on any sensitive habitats or vegetation found on site.

3 DRAFT SCOPING REPORT - COMMENTS AND RESPONSES

Table 1 – Comments and feedback from the scoping report public review period received from Pete Morkel:

Comment	EAP/Proponent Response
Because it's impossible to ensure toilet facilities are used at all times, we expect all proponent staff involved with on-site prospecting work be dewormed. The beef tapeworm (*Taenia saginata*) is a huge problem in Namibia and when people defecate in the veld game becomes contaminated and their meat is worthless and this is a costly problem we can not afford.	Although it has been reported that no evidence was found of *Taenia saginata* in Namibia (Epidemiology of Taenia saginata taeniosis/ cysticercosis: a systematic review of the distribution in southern and eastern Africa Veronique Dermauw et. al, 2018 (https://d-nb.info/1174185864/34), precautions can be taken if there are cattle in the prospecting area, including the requirement for all on site staff to be regularly (annually) dewormed.
Since first being informed about the EPL and the associated activities the security situation in this part of Namibia has significantly deteriorated and this includes the armed robbery of isolated farmsteads. Prospecting will markedly increase our security risk and the proponent must actively help us in this regard and we envisage a security company might need to be brought in to assist with the movement control of people, vehicles and goods, guarding, patrolling etc. The senior staff supervising the prospecting will also need keys for our various gates and must be responsible for looking after the keys and ensuring that the gates are kept locked at all times. Of course improved security will also greatly help with the potential poaching of fauna and flora on our properties related to prospecting work.	Given the limited number of staff envisioned during the prospecting phase, it may not be necessary to add additional impact through the provision of permanent security staff, however, access control procedures and security standard standards will be developed and implemented. The additional prospecting staff on site should be able to assist in identifying trespassers. A dual lock system can be utilised to ensure that each party is responsible for its own access keys. Security measures to prevent theft and poaching have also been included in the EMP under section 2.5, p. 17.
It is essential that a register is kept by the prospecting supervisor with details of work done, people involved, vehicle movements,	This can readily be incorporated into the access control procedure to be developed prior to prospecting. A communication protocol

Comment	EAP/Proponent Response
problems, incidents etc. It must be kept on-site and updated everyday and available for scrutiny by landowners and their appointed subordinates. Such a register is essential for good security and to ensure fair compensation for landowners and to help prevent disputes between the various parties.	should also be established between the prospecting site supervisor and the landowners to ensure all parties are kept up to date on movement of people, equipment, material and vehicles. This has also been included in the EMP under section 2.5, p. 15.

Table 2 - Comments and feedback from the scoping report public review period received from Johannes Van De Merwe

Comment	EAP/Proponent Response
Not really a option due to the height difference. Refer to section 4.7 water supply in the scoping report.	Water will most likely be imported and transported by tractor and/or trailers. This has been included in the scoping report.
Can we request that an ID copy of all workers be submitted to landowner. Refer to section 2.4 of the EMP.	This will be included in the land access agreement.
Will provided certified ID copies of all staff on the ground to landowner. Refer to section 4.8 workers and accommodation in the scoping report.	Comment noted.
Bring own firewood. Not allowed to collect here. Refer to section 4.8 workers and accommodation in the scoping report.	This has been included in the EMP under section 7.4, table 5.
Dreihuk Dam is an extremely unsuccessful dam. No water is pumped out of the dam only from boreholes drilled near the dam wall. The dams water is purely there to recharge the boreholes.	Comment noted, this was included merely for baseline purposes.
Get landowner permission or supervision. Refer to Table 7 under section 6 of the scoping report, regarding the removal of some vegetation and temporary campsites near the drill sites.	This will be included in the land access agreement.

Comment	EAP/Proponent Response
I would suggest a more delineated approach to the target sampling points. You know of the sensitivity of the vegetation as well as the current conservation that is going on here. I would suggest reviewing all the sampling points in relation to areas that can be problematic for example: Target 3 is presumably located 300m away from what looks to be a quartz ridge, we know most of the sensitive vegetation is located on quart koppies/ridges (only an example) And by doing this you could easily identify lets say 3 or 4 sensitive targets that can be visited along with 2 not sensitive and 2 or 3 river streams to be sampled. I am not saying that you need to visit every sampling point however that would have been the best. But by going through this process you can easily identify points that would be best not to do the sampling and rather suggest less sensitive targets for the sampling. This would show the landowner your genuine concern to the environment as well as your capability as an environmentalist. All of this can be nicely set out on a map that shows the targets and sensitive areas and indicating what areas to avoid. Another good example will be stream samples that are located near a natural surface water body or animal dug hole with water (we have a few now from the winter's rains). These are some of the only	Comment noted. Provision of this has been outlined in the scoping report in Section 5.5.1 pg 42. These stream sampling sites have also been mapped and included in section 5.5.1. Issues around poaching and disturbance of animals have been included in the EMP in section 2.5 Table 2 and section 7.4 table 5.5. Further to this a biodiversity study will be conducted to identify sensitive areas and thereafter the Proponent may revise the locations of their soil sampling sites.

Comment	EAP/Proponent Response
drinking spots for animals and will make the animals vulnerable for poaching when the teams are there doing their sampling. I would suggest these places be identified beforehand as well as the sampling locations moved, however this can only be done by visiting the sites. Because I am very sure that a few of these points are located in a sensitive environment that would be best just to leave or move rather than to relocate plants or scare off animals.	

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. ECC acknowledges that constructive feedback results in an improved ESIA and a project that is understood by the community and I&APs.