

Communication with I&APs and Means of Consultation Employed

Regulation 21 of the EIA Regulations details the steps to be taken during a public consultation process, and these have been used in guiding this process. Communication with I&APs with regard to the project was facilitated through the following means and in this order. Local community/stakeholders' input is essential for the EIA and ultimately the project to ensure the road serves both local and regional development goals.

- A Background Information Document (BID) containing brief information about the proposed project was compiled and hand-delivered to the Ministry of Environment, Forestry and Tourism (MEFT), accompanying the ECC application, and uploaded on the MEFT (ECC) Portal for project registration and shared with registered Interested and Affected parties (I&APs).
- Project Environmental Assessment notices were published in the New Era and Windhoek Observer newspapers dated 12 & 19 May 2025 in the *New Era* newspaper and 14, 15 & 19 May 2025 in *Windhoek Observer* (Appendix C). The consultation period ran from the 12th of May 2025 to the 20th of June 2025.
- A combined consultation meeting between key stakeholders and some community members was scheduled and held on the 21st of June 2025 in Marienfluss at the Community Campsite (Figure 1). In the meeting, the EPL area was attended and represented by combined community members and Conservancy management committee members from the Marienfluss and Orupembe (including a representative from the Integrated Rural Development and Nature Conservation (IRDNC)). The meeting attendees included three environmental consultants and two representatives from the Proponent. Meeting minutes were taken and attached hereto as Appendix D.



Figure 1: The EIA Consultation meeting at the Marienfluss Community Campsite in the Kunene Region on the 21st of June 2025

- Due to the remoteness of the area with no settlement, an EIA poster was only placed at the Kunene Regional Council in Opuwo—**Error! Reference source not found.**.. The copy of the poster is attached as Appendix E.

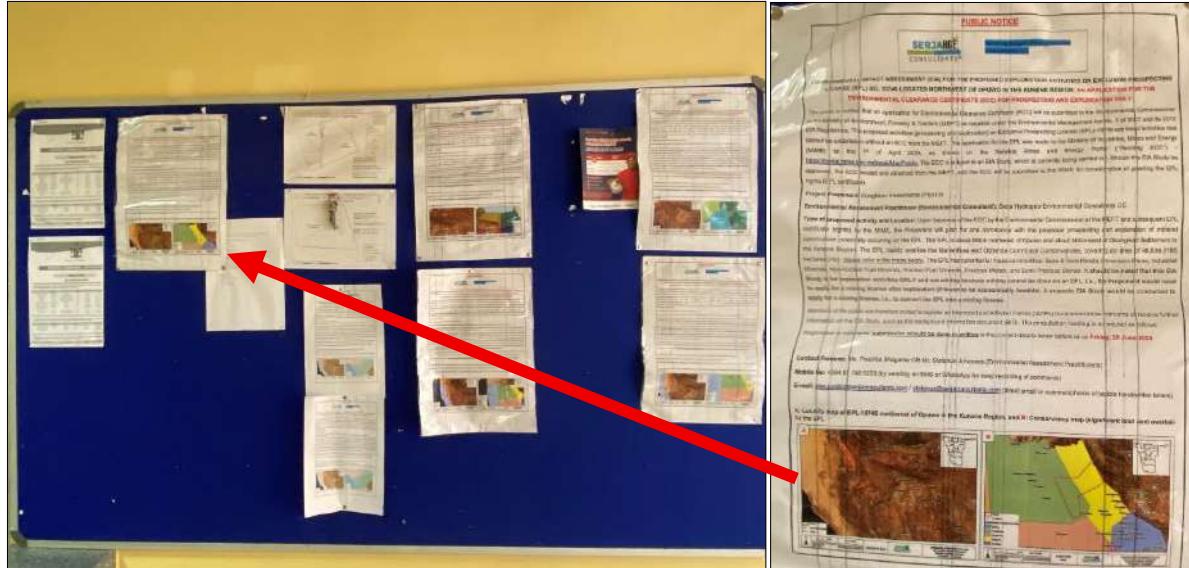


Figure 2: The EIA poster at the Kunene Regional Council's notice board in Opuwo

To fulfill the EIA Study documents, as requested by the MEFT and following consultation meetings, consent letters for the EPL have been issued by the Conservancy Management and the Traditional Authority.

Feedback and Issues raised by the Stakeholders (I&APs)

Issues were raised by I&APs (from the consultation meetings and review of draft documents), and these issues have been recorded and incorporated in the final ESA Report and EMP. The summary of these few key issues is as follows:

- Prioritizing the local community for employment opportunities.
- Transparency and clear communication between the proponent and the conservancies in the EPL area, i.e., there should be transparency and constant communication between the local community and the proponent to update them on the project progress.
- The zonation of the conservancies, as well as villages that are not in the BID maps, needs to be mapped in relation to the EPL to ensure that highly sensitive areas are excluded from the exploration activities.
- The request for the proponent to return to the community representatives (traditional authority and conservancies) to forge a way forward once the ECC and EPL certificates are issued by the MEFT and MIME, respectively.
- Water Resources Impact: Water is extremely scarce in Kunene, and any use or potential contamination of water resources is a critical issue.

- Soil Disturbance and Erosion
- Biodiversity and Habitat
- Water Resources Impact: Water is extremely scarce in Kunene, and any use or potential contamination of water resources is a critical issue.
- Air Quality and Noise.
- Visual and Landscape Impacts.
- Occupational and Community Health & Safety
- Socio-economic landscape
- Cumulative impacts assessment
- Recommendation for a coordinated consultation approach throughout the project cycle.
- Recommendation for a Regional or Strategic Environmental Assessment Approach. However, this is directed to the MEFT for future consideration regarding mineral exploration within the Kunene communal conservancies. Short of a formal SEA, the proponents and consultant should at a minimum engage in information-sharing and coordination amongst themselves.

Feedback on the Draft Scoping Assessment Report Review

After the compilation of the draft Scoping Report and Environmental Management Plan (EMP), the two documents and consultation meeting minutes were circulated to registered stakeholders for review and further comments before finalizing for submission to the MEFT for evaluation. The review and comments period was fourteen (14) days, i.e., from the 02nd to the 17th of October 2025. The email circulation is shown in Figure 3.

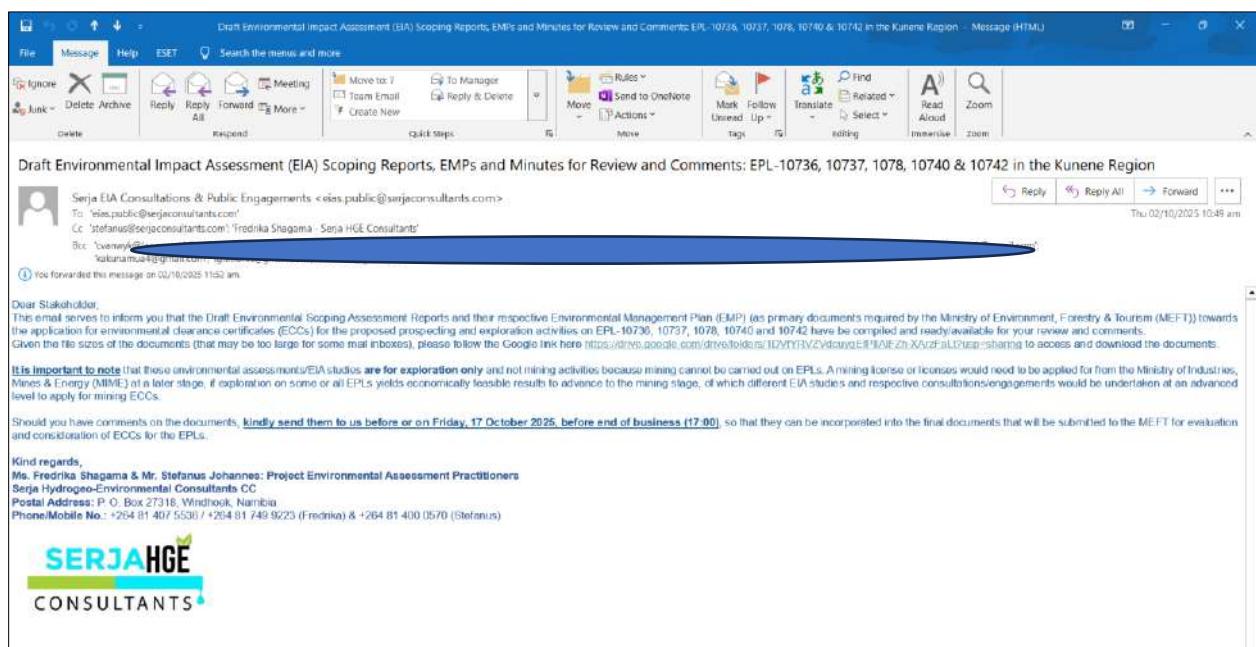


Figure 3: Proof of circulation of the draft Scoping Report and EMP to registered I&APs on the 02nd of October 2025

There were no major issues or comments received from one of the stakeholders (from IRDNC) on the draft documents. However, one stakeholder responded to the email circulation enquiring if there would be a feedback meeting to review (go through) the circulated draft Scoping Report and EMP with communities. The Environmental Consultants responded that due to the time and resources constraints, there was no provision for a feedback meeting in the Kunene Region at this moment – Figure 4. However, recommendations have been made in the EMP to require the Proponent to hold an additional meeting with the communities should the ECC and EPL certificates be issued and granted, respectively. The meeting would be held as part of the planning phase for the communities, their leaders, and the Proponent to come together and plan for the commencement of activities and agree on conditions of operations.

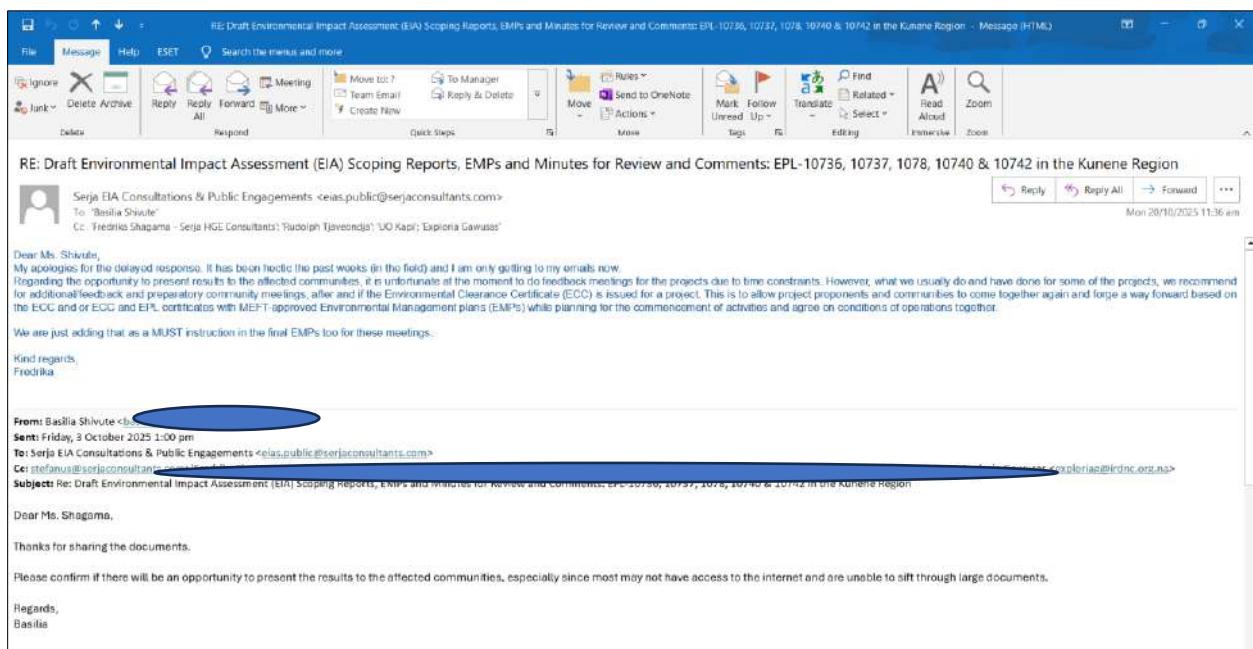


Figure 4: Proof of a stakeholder's email on the review of the draft documents and response from SERJA HGE Consultants on the 20th of October 2025, before finalizing the documents for submission

Comments received from I&APs after the Draft Review deadline

Furthermore, late comments were submitted to Serja Consultants on the 24th of October 2025, accompanied by an apology. Therefore, these comments were accepted and have been addressed and incorporated in this Report and in the EMP. The summary of these key issues/comments submitted is as follows, although some impacts have already been listed and addressed in the Report. However, some impacts were detailed by the I&APs; thus, they have been incorporated. The comments (as received) and their responses are appended hereto as Appendix G: G1 and G2, respectively.

The comments provided do not halt or object to the proposed project activities, but were meant to contribute to the improvement of the EMP and ensure that the biological, physical, and social environments are protected during the implementation and after completion of the project activities.

Appendix C: EIA Notification in the newspapers (*New Era* and *Windhoek Observer*)

CLASSIFIEDS

Notice

Notice

Legal Notice

Legal Notice

CALL FOR PUBLIC PARTICIPATION/COMMENTS FOR THE ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED ESTABLISHMENT OF TOWNSHIP IN THE TOWN OF USAKOS, ERONGO REGION

The public is hereby notified that an application for an Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed project is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is issued upon approval of an EIA Study.

Name of proponent: Usakos Town Council

Name of the Environmental consultant: Savannah Environmental Consultants Services CC

Project location and description: Usakos Town Council is planning of developing the townland. The development will include establishment of 5 extension with residential erven, streets, institutions, roads, and rezoning.

Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and invited for the public consultation meeting scheduled as follows:

Date: 17 May 2025

Time: 09H00

Venue: Usakos Community Hall, Usakos

Registration requests and comments should be forwarded to Savannah Environmental Consultants Services CC on or before the 23 May 2025. Contact Persons: Mr. Mandume Leonard; Email: savannahconsultants277@gmail.com



FORM 24
RULE108(2)(a)
IN THE HIGH COURT OF
NAMIBIA
(MAIN DIVISION –WINDHOEK)
CASE NO: HC-MD-CIV-AC-
CON-2023/ 0471

FIRST NATIONAL BANK OF
NAMIBIA
APPLICANT
LIMITED
and
RESPONDENT

NOTICE BY JUDGMENT
CREDITOR TO JUDGMENT
DEBTOR

TAKE NOTICE THAT the Applicant, FIRST NATIONAL BANK OF NAMIBIA LIMITED (hereinafter called the "JUDGMENT CREDITOR") will obtain Judgment against the Respondent, MCALBERT KATJIVIRUE hereinafter called the "Judgment Debtor") in this Honourable Court on 01 February 2024 for default judgment.

TAKE FURTHER NOTICE THAT the JUDGMENT CREDITOR has hereby applied in terms of Rule 108(1)(b) for an order declaring the immovable property executable and the JUDGMENT DEBTOR or any other person is hereby called to provide reasons to this Honourable Court within 10 (TEN) days why such an order may not be granted.

TAKE FURTHER NOTICE THAT the JUDGMENT DEBTOR or any other person may show cause to this Honourable Court on Friday the 9TH day of June 2025 at 10:00 am why the property should not be declared executable or sold.

Failure to attend at Court on Friday, 9th day of June 2025 at 10:00, would entitle the Honourable Court to grant the Order declaring the property executable.

Dated at WINDHOEK on this 25th day of APRIL 2025.

ANGULA CO INCORPORATED
LEGAL PRACTITIONER FOR
APPLICANT/ PLAINTIFF

11 Schuster Street
Windhoek
Telephone: 419 500
Fax: 419 505

REF: DEB2230/EPH

TO:
THE REGISTRAR OF
THE HIGH COURT
WINDHOEK

AND TO:
MCALBERT KATJIVIRUE
DEFENDANT
AND/OR ANY LESSEE
ERF NO.1293, GOUS STREET,
UNIT 19,
MEGA PARK, PIONIERSPARK
WINDHOEK

Employment

Offered

Employment

Offered

Vacancy

Jakkals Vellies Namibia

Vacancy:
Qualified Shoe Designer & Shoemaker

Location: **Swakopmund**

Send your CV to:
info@jakkalsvellies.com

Only Namibian Citizens Should Apply

Services

General



EMPLOYMENT OPPORTUNITY / OMITO YIOLONGA

Clothing Company looking for the **machinist (tailors)** who can work on industrial machine. Contact: **0857461813**
Otakukongwa aahondji, naakwatheli yokukangula nukuteta oongodhi. Nayakale yapokoka nawa, tayakalongela ko Cimbebasia. Mboka yenaehalo nayadhenge ko **0857461813**

AfricanDeli

Committed to quality prepared goodness

VACANCY PROCESS ENGINEER

African Deli, based in Walvis Bay, was founded in 2013 with the purpose of producing cost-effective ready to eat food as well as bringing consumer-friendly packaging solutions to the market. The consumer without a fridge or protected storing space can now store our products for 24 months in a room temperature environment. We strive to bring healthy foods into people's homes. The Process Engineer is responsible for facilitating the manufacturing of products by leading the Production and Maintenance department by ensuring that a standardized, optimum, efficient, and profitable world class manufacturing system is in place and maintained.

Education & Skills:

- Honors degree in Industrial and Manufacturing Engineering OR Qualification in a relevant Production and Manufacturing Engineering field.
- Minimum of 8 years of experience in Pouch Food Manufacturing industry (FMCG), Heat treatment products processing, Mass production and Maintenance.

Additional Competencies:

- Lean manufacturing or Six Sigma certification and application experience will be an added advantage.
- Project management in terms of product development and production line units installations will be an added advantage.
- Working knowledge of various Total Quality management systems ISO 9001, ISO 14001, OHSAS 18000, FSSC 22 000, HALAL and HACCP systems
- Advanced knowledge in Programmable Logical Control (PLCs) systems will be a distinct advantage.
- Knowledge of customization of Enterprise Resources Planning systems in terms of general ledgers, Bill of Materials, Auto manufacturing and retailing.
- Attention to detail & Good with mathematical models, work study models and production models systems such as batch processing and mass production.
- Deadline oriented and point on planning skills.
- Depth knowledge of a vast range of industrial machinery applications in the packaging solutions sector.
- Competence with training skills is an added advantage as the post requires a lot of training staff

Responsibilities:

- Responsible for new product development, production lines designing and installation, production process flows designing, and maintenance of production process systems.
- Implementing lean manufacturing systems with an intent to lower production costs
- Maintaining manufacturing equipment through preventative and corrective maintenance.
- Providing technical support and training of employees on factory equipment.
- Implement continuous improvement methods, minimizing production waste and ensure cost effective manufacturing initiatives.
- Generation of departmental budgets, production and maintenance reports and projects management.
- Demand planning, capacity planning, material planning and manpower planning.
- Championing safety, health, and environment following regulatory guidelines.
- Computing or performing automated manufacturing processes on SAGE system, continuous design of the system modules to increase efficiency.

Closing Date for Applications:

18 May 2025
(CVs with qualifications to be sent to recruitment@africandeli.com if you have not heard from us within 2 weeks of your application, please regard your application as having been unsuccessful.)

Notice

Legal Notice

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO.

10736 LOCATED NORTHWEST OF
OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Ashford Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10737. The EPL covers an area of 85,698.1139 hectares (ha) and is about 120km southwest of Opuwo and about 90km west of Kaoko-otavi Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Naxos Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10742. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Hildesheim Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10742. The EPL covers an area of 73,402.1031 hectares (ha) and is about 110km west of Opuwo and about 90km northwest of Kaoko-otavi Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Marienfuss Communal Conservancy

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Orupembe Communal Conservancy

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Serja Hydrogeo-Environmental Consultants CC

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10742. The EPL covers an area of 73,402.1031 hectares (ha) and is about 110km west of Opuwo and about 90km northwest of Kaoko-otavi Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Serja Hydrogeo-Environmental Consultants CC

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Serja Hydrogeo-Environmental Consultants CC

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo-Environmental Consultants CC

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. The EPL is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo-Environmental Consultants CC

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Project Proponent: Serja Hydrogeo

CALL FOR PUBLIC PARTICIPATION/COMMENTS FOR THE ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED ESTABLISHMENT OF TOWNSHIP IN THE TOWN OF USAKOS, ERONGO REGION

The public is hereby notified that an application for an Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed project is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is issued upon approval of an EIA Study.

Name of proponent: Usakos Town Council

Name of the Environmental consultant: Savannah Environmental Consultants Services CC

Project location and description: Usakos Town Council is planning of developing the townland. The development will include establishment of 5 extension with residential erven, streets, institutions, roads, and rezoning.

Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and invited for the public consultation meeting scheduled as follows:

Date :17 May 2025

Time: 09H00

Venue: Usakos Community Hall , Usakos

Registration requests and comments should be forwarded to Savannah Environmental Consultants Services CC on or before the 23 May 2025; Email: savannahconsultants277@gmail.com



NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT

FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 9983 IN USAKOS AREA, ERONGO REGION.

OUTRUN CONSULTANTS CC HEREBY GIVES NOTICE OF THE ENVIRONMENTAL IMPACT ASSESSMENT FOR THE EXPLORATION ACTIVITIES ON 9983.

The exact location of the project site is highlighted in the Background and Invitation to participate Document (BID). An EIA is being commissioned as required under the Environmental Management Act, 7 of 2007 and Regulations of 2012. Interested and Affected Parties are invited to register and attend meetings as detailed below.

PROPOSER(S): ELDNPAN MINERALS cc

PROJECT ACTIVITIES: EXPLORATION FOR BASE & RARE METALS, INDUSTRIAL MINERALS AND PRECIOUS METALS.

PROJECT LOCATION: USAKOS AREA -ERONGO REGION – LOCATION MAPS ARE PROVIDED IN THE BIDS.

PUBLIC PARTICIPATION: A FORMAL MEETING WILL BE HELD ONSITE 10HRS00 ON THE 30TH OF MAY 2025.

VENUE: FARM GOABEB 63

Josiah – 0812 683 578,

E-Mail: outrungreeninfo@gmail.com



BUSINESS SUCCESS CONSULTING



PUBLIC INVITATION

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF A MINI MARKET AT ONATHINGE VILLAGE, ONAYENA CONSTITUENCY IN OSHIKOTO REGION

Notice is hereby given to all Interested and Affected Parties (I & APs) that an application will be made to the Environmental Commissioner in terms of Environmental Management Act No. 7 of 2007 and its regulations (GN 30 of 6 February 2012) for the following intended activity.

Project Name: CONSTRUCTION OF A MINI MARKET AT ONATHINGE VILLAGE IN THE OSHIKOTO REGION

Project Location: ONATHINGE VILLAGE IN OSHIKOTO REGION

Project Description: CONSTRUCTION OF A MINI MARKET AT ONATHINGE ON A 2.1 HA PORTION OF LAND

Proponent: MS. HILMA SHIPANGA

Environmental Consultant: BUSINESS SUCCESS CONSULTING

All Interested and Affected Parties (I & APs) are encouraged to register and provide comments. The Public Meeting will be held on 30 May 2025 at 10h00, Proposed Project Site along B1 Road, 1 km from Onathinge T-junction. If you want to register as I & APs and receive the Background Information Document, please contact our office:

Contact No: 0811404555

Email: bsccongivediva@gmail.com

BS Office at ERF, 5059 OMATANDO STR. ONGWEDIVA

DEADLINE FOR COMMENTS IS 16TH MAY 2021

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10736 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Naxos Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. EPL-10736 mainly overlies the Marienfluss Communal Conservancy and partly over the Orupembe Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e. SMS or WhatsApp)

Email: eias.public@seriaconsultants.com / stefanus@seriaconsultants.com



PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10737 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Ashford Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10737. The EPL covers an area of 85,698.1139 hectares (ha) and is about 120km southwest of Opuwo and about 90km west of Kaoko-otavi Settlement in the Kunene Region. Furthermore, the EPL partly overlies the Okondjombo Communal Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e., SMS or WhatsApp)

Email: eias.public@seriaconsultants.com / stefanus@seriaconsultants.com



PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10738 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Bodmin Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10738. The EPL covers an area of 14,728.1759 hectares (ha) and is about 100km southwest of Opuwo and about 50km west of Kaoko-otavi Settlement in the Kunene Region. The EPL mainly overlies the Otjikongo Conservancy and partly overlies the Otju-West Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

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'Anytime I get on a plane, I think of Final Destination': The horror film that traumatised millennials

Twenty-five years ago, the first instalment terrified by making everyday scenarios into death traps. Now, after a 14-year break, Final Destination: Bloodlines is tweaking the formula. "In death, there are no accidents, no coincidences, no mishaps, and no escapes."

Those are the unsettling words of all-knowing mortician William Bludworth (played by Tony Todd) in the first Final Destination (2000), a horror film without a masked killer, bloodsucking vampire or brain-eating zombies to torment its victims – just the looming spectre of death and a cruel reality: no matter how far we run, or how much we hide, it will come for us all.

Back in the original film, death certainly didn't come peacefully for a group of high school kids and their teacher, who narrowly escaped losing their lives after getting off their plane, the ill-fated Flight 180, just before it exploded, thanks to one of their number having a premonition – only to find that the Grim Reaper wanted to take revenge on them for cheating its design.

So for 90 minutes, audiences strapped in to watch this invisible antagonist orchestrate some of the most intricate and shocking demises imaginable for each survivor, involving all kinds of routine objects, from a clothesline to kitchen knives. Young audiences around the world left cinemas scared of everything around them. "I must have been 15, seeing it with my friends, and we were grabbing each other," millennial and filmmaker Diana Ali Chire tells the BBC. "The plane thing was just genius because anytime I get on a plane, I think of Final Destination." The brainchild of screenwriter Jeffrey Reddick, Final Destination followed in the teen horror footsteps of Scream (1996) and I Know What You Did Last Summer (1997) to become a box office success, traumatising an entire generation of cinema-goers along with it. "[As millennials] we grew up on 90s slasher movies and they all have that



New instalment Final Destination: Bloodlines marks the franchise's return after 14 years (Credit: Warner Bros)

similar vibe of cool, young stars of the time with a nice balance of scary and entertaining – Final Destination felt so much like it was part of that wave," Mike Muncer, host of the Evolution of Horror podcast,

tells the BBC. "I remember seeing posters for it and thinking, 'This is very much my jam.'" But thanks to its grisly, nihilistic plotline, it also shifted the teen horror needle, adds Muncer. "We didn't have a masked

killer anymore, there was no motive, it was just watching people die and being walloped with something entirely unexpected."

The film subsequently spawned four sequels, each one keeping the

same basic formula but upping the ante with even more elaborate ways to end human life, before taking a 14-year break. But now, finally, it's back this week with a sixth instalment, Final Destination: Bloodlines, whose storyline ties every previous film together. "It was important for us to thread the needle to make the movie both very clearly part of the franchise canon and part of the lineage of all the previous movies," co-director Zach Lipovsky tells the BBC. "But also [we wanted to make it] incredibly fresh and unpredictable for all the people who love these movies."

From idea to screen

The franchise began when a 27-year-old Reddick was reading a news article while taking a flight from New York back to his home state of Kentucky. The story described a woman who had avoided being in a plane crash by switching flights because of a bad feeling her mother had about her original aircraft. It inspired him to write a "spec script", or unsolicited screenplay, for his favourite TV show, The X-Files, in which "Scully's brother had a premonition", Reddick explains. "[I thought:] what if they cheated death, and death came after them?"

Working at New Line Cinema at the time, Reddick shared this episode script with colleagues who were so impressed by the originality of the concept that they persuaded him to write it as an entirely separate feature film instead. "[There are] shades of The Omen in Final Destination, where you've got this little devil child Damien causing bad things to happen to people," Muncer says. "But I think it's pretty unique." The script went through a lot of changes before production began in Long Island and Vancouver in 1999. "In the original story, death was a force that took over a police detective who was investigating a case," Reddick explains, "You found out that he had flatlined at the same time as a plane crash, so the essence of death went into him and he was killing off the crash survivors."

But for producer Craig Perry, who has worked on every Final Destination film, it was "the intersection of coincidence and what ifs" in the original three-page outline that he wanted the film to focus on. "Everyone at some point in their lives has had a moment of *deja vu*, or that weird, tingly feeling that something bad is about to happen," he tells the BBC. "Or conversely, when you have a close call, you start to wonder, maybe had I not turned left but right, I would be dead."

With such bleak fatalism at its core, some mischievousness was injected for balance once seasoned X-Files scribes James Wong and Glen Morgan entered the frame. They punched up death into a more playful character by way of its elaborate killing schemes, which were inspired by late American cartoonist Rube Goldberg's famous drawings of "chain reaction devices": imaginary inventions "where A had to hit B, which had to hit C, which had to hit D, in perfect sequence for the machine to work", notes Perry. Yet the studio couldn't get their heads around an antagonist they couldn't see. "You've [typically] got a Freddy,

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10742 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Hildesheim Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10742. The EPL covers an area of 73,402.1031 hectares (ha) and is about 110km west of Opuwo and about 90km northwest of Kaoko-otavani Settlement in the Kunene Region. The EPL overlies the Marienfuss and Orupembe Communal Conservancies. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

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Contact Persons: Ms. Fredrika Shagama and Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e., SMS or WhatsApp)

Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com



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ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10740 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Congleton Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10740. The EPL covers an area of 48,836.2195 hectares (ha) and is about 90km northwest of Opuwo and about 30km west of Okangwati Settlement in the Kunene Region. The EPL overlies the Marienfuss and Ojtjantanda Communal Conservancies. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

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Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com



TO NEXT PAGE

CALL FOR PUBLIC PARTICIPATION/COMMENTS FOR THE ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED ESTABLISHMENT OF TOWNSHIP IN THE TOWN OF USAKOS, EROMGO REGION

The public is hereby notified that an application for an Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed project is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is issued upon approval of an EIA Study.

Name of proponent: Usakos Town Council

Name of the Environmental consultant: Savannah Environmental Consultants Services CC

Project location and description: Usakos Town Council is planning of developing the townland. The development will include establishment of 5 extension with residential erven, streets, institutions, roads, and rezoning.

Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and invited for the public consultation meeting scheduled as follows:

Date :17 May 2025

Time: 09H00

Venue: Usakos Community Hall , Usakos

Registration requests and comments should be forwarded to Savannah Environmental Consultants Services CC on or before the 23 May 2025; Email: savannahconsultants277@gmail.com



NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT

FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 9983 IN USAKOS AREA, EROMGO REGION.

OUTRUN CONSULTANTS CC HEREBY GIVES NOTICE OF THE ENVIRONMENTAL IMPACT ASSESSMENT FOR THE EXPLORATION ACTIVITIES ON 9983.

The exact location of the project site is highlighted in the Background and Invitation to participate Document (BID). An EIA is being commissioned as required under the Environmental Management Act, 7 of 2007 and Regulations of 2012. Interested and Affected Parties are invited to register and attend meetings as detailed below.

PROPOSER(S): ELDNPAN MINERALS cc

PROJECT ACTIVITIES: EXPLORATION FOR BASE & RARE METALS, INDUSTRIAL MINERALS AND PRECIOUS METALS.

PROJECT LOCATION: USAKOS AREA -ERONGO REGION – LOCATION MAPS ARE PROVIDED IN THE BIDS.

PUBLIC PARTICIPATION: A FORMAL MEETING WILL BE HELD ONSITE 10HRS00 ON THE 30TH OF MAY 2025.

VENUE: FARM GOABEB 63

Josiah – 0812 683 578,

E-Mail: outrungreeninfo@gmail.com



BUSINESS SUCCESS CONSULTING

PUBLIC INVITATION

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF A MINI MARKET AT ONATHINGE VILLAGE, ONAYENA CONSTITUENCY IN OSHIKOTO REGION

Notice is hereby given to all Interested and Affected Parties (I & APs) that an application will be made to the Environmental Commissioner in terms of Environmental Management Act No. 7 of 2007 and its regulations (GN 30 of 6 February 2012) for the following intended activity.

Project Name: CONSTRUCTION OF A MINI MARKET AT ONATHINGE VILLAGE IN THE OSHIKOTO REGION

Project Location: ONATHINGE VILLAGE IN OSHIKOTO REGION

Project Description: CONSTRUCTION OF A MINI MARKET AT ONATHINGE ON A 2.1 HA PORTION OF LAND

Proponent: MS. HILMA SHIPANGA

Environmental Consultant: BUSINESS SUCCESS CONSULTING

All Interested and Affected Parties (I & APs) are encouraged to register and provide comments. The Public Meeting will be held on 30 May 2025 at 10h00, Proposed Project Site along B1 Road, 1 km from Onathinge T-junction. If you want to register as I & APs and receive the Background Information Document, please contact our office:

Contact No: 0811404555

Email: bscongwediva@gmail.com

BSI OFFICE AT ERF, 5059 OMATANDO STR. ONGWEDIVA

DEADLINE FOR COMMENTS IS 16TH MAY 2021

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10736 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Naxos Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. EPL-10736 mainly overlies the Marienfluss Communal Conservancy and partly over the Orupembe Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e. SMS or WhatsApp)

Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com



PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10737 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Ashford Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10737. The EPL covers an area of 85,698.1139 hectares (ha) and is about 120km southwest of Opuwo and about 90km west of Kaoko-otavi Settlement in the Kunene Region. Furthermore, the EPL partly overlies the Okondjombo Communal Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

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ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10738 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

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Project Proponent: Bodmin Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10738. The EPL covers an area of 14,728.1759 hectares (ha) and is about 100km southwest of Opuwo and about 50km west of Kaoko-otavi Settlement in the Kunene Region. The EPL mainly overlies the Otjikongo Conservancy and partly overlies the Otjiu-West Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

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Staff from Bank Windhoek and the National Art Gallery of Namibia (NAGN) pictured at the launch of the arts competition on Wednesday. Photo: Bank Windhoek

NAGN calls on artists to represent Namibia's identity globally through art

JUSTICIA SHIPENA
Staff Writer

Michelle Van Wyk, the director of the National Art Gallery of Namibia (NAGN), has urged Namibians to unite in visually expressing their identity on international platforms. She made this call at the launch of the Bank Windhoek Triennial on Tuesday. Van Wyk emphasised the importance of using art to tell the world who Namibia is and who it is

becoming.

The launch event, held in Windhoek, marked the beginning of the sixth edition of the Triennial, which carries the theme "Namibian Identity: The Linework of a Country's Contours and Wealth".

The competition invites artists to explore and portray the essence of Namibian identity through their creative expressions.

Van Wyk also highlighted the ongoing efforts to include artists from all Namibian regions.

This year, NAGN has partnered with regional art extension offices to ensure broader participation and provide support to artists across the country.

NAGN's chief curator, Ndeenda Shivate-Nakapunda, shared that these art offices would play a key role in the selection process, ensuring that submitted works meet the competition's high standards.

The offices also aim to provide artists with the necessary resources and information to help

them refine their submissions. Bronwyn Moody, Bank Windhoek's head of stakeholder engagement, corporate social responsibility, and sponsorships, emphasised that the Triennial is more than just an art competition.

"For Bank Windhoek, the Triennial is a mirror held up to society, reflecting our collective journey with endless possibilities," she said.

Moody also noted the bank's longstanding role as the title sponsor of the exhibition, a partnership that has been in place since 2008.

Bank Windhoek continues to provide a vital platform for Namibian artists to showcase their work and shape the future of the country's art scene.

To encourage creativity and foster the growth of emerging artists, the competition will feature a category for youth under the age of 35.

The NAGN will also invite these emerging artists to participate in its emerging artists' program.

The competition offers prizes for the top three winners. The overall winner will receive N\$50,000 and a solo exhibition at the NAGN.

The second and third-place winners will be awarded N\$35 000 and N\$25 000, respectively.

In addition to the cash prizes, the NAGN will provide ongoing support to help the top winners develop their careers.-BBC

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ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10742 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

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Project Proponent: Hildesheim Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10742. The EPL covers an area of 73,402.1031 hectares (ha) and is about 110km west of Opuwo and about 90km northwest of Kaoko-otavi Settlement in the Kunene Region. The EPL overlies the Marienfuss and Orupembe Communal Conservancies. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

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ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10740 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

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Project Proponent: Congleton Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10740. The EPL covers an area of 48,836.2195 hectares (ha) and is about 90km northwest of Opuwo and about 30km west of Okangwati Settlement in the Kunene Region. The EPL overlies the Marienfuss and Ojtjatanda Communal Conservancies. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

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CLASSIFIEDS

Notice

Legal Notice



MUNICIPALITY OF HENTIES BAY NOTICE

INTENTION TO ALIENATE PORTION X OF REMAINDER OF THE FARM NO.133 HENTIESBAAI TOWNLANDS TO MESSRS DRUP FAMILY TRUST

By virtue of Council Resolution CO10/25/04/2025/04th 2025 and in terms of Section 63 (2)(b) of the Local Authorities Act, (Act 23 of 1992) as amended, read in conjunction with Section 30 (1)(t) of the Local Authorities Act 1992 (Act 23 of 1992) as amended, notice is hereby given that the Municipal Council of Hentiesbaai intends to alienate a portion X of Hentiesbaai Town and Towlnd no.133, measuring in extend of 2,427 Hectares at a cost of N\$ 15.00 p/m² amounting to a total purchase price of N\$ 364 050.00 (Three Hundred and Sixty Four Thousand, and Fifty Namibian Dollars only), by way of private treaty to Messrs Drup Family Trust for development of Luxury Apartments and Conference Facilities purposes.

Further take note that the locality and the layout plan of the property lies open for inspection during office hours at the offices of the Municipal Council situated at the corner of Jakkalsputz Road and Nickey Iyambo Avenue.

Any person(s) having objection(s) to the intended alienation of the portion may lodge such objection(s) fully motivated to the undersigned, within fourteen (14) days after the second placement of the advert.

Acting Chief Executive Officer
P O Box 61
Henties Bay

Consent uses, erection of Buildings and use of land in terms of Town Planning Scheme Regulations

Notice is hereby given in terms of Clause 7 of the Katima Mulilo Town Planning Scheme Regulations that the Town Council considers the following consent use, erection of buildings and use of land, details of which are obtainable from the Manager: Town Planning Department.

1. Erf 1794 Liambai: Special Permission for Accommodation establishment.

Contact person: Ms. Riana Kadimba 0814773576 (Acting Town Planning Manager)
Ms. Memory Milihi 0813179201 (Applicant)

Any person having any objections to the proposed steps may lodge such objections, duly motivated in writing, with the Chief Executive Officer until 5 June 2025.

Employment

EMPLOYMENT OPPORTUNITY / OMITO YIILONGA

Clothing Company looking for the **machinist (tailors)** who can work on industrial machine. Contact: 0857461813

Otakukongwa aahondji, naakwatheli yokukangula nokuteta oongodhi. Nayakale yappyokoka nawa, tayakalongela koCimbebasia. Mboka yenaehalo nayadhenge ko 0857461813

Notice

Legal Notice

NOTICE OF ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON THE EXCLUSIVE PROSPECTING LICENCE (EPL) NO. 9380 LOCATED NORTHEAST OF GRUNAU IN THE //KARAS REGION

Under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations, the proposed exploration activities on EPL 9380 require Environmental Clearance Certificate (ECC) from the Department of Environmental Affairs and Forestry (DEAF) before commencement.

The public is notified that application for ECC to allow for exploration activities on EPL 9380 will be submitted to the Environmental Commissioner. The environmental scoping process will be carried out to identify potential positive and negative impacts of the proposed activities and to support the evaluation process for ECC.

The main target commodity on EPL: Base and Rare Metals, Industrial Minerals, Dimension Stone and Precious Metals

Proponents: Puma Gold (Pty) Ltd
Environmental Consultant: Excel Dynamic Solutions (Pty) Ltd
Public members are invited to register as Interested and Affected Parties to comment/raise concerns or receive further information on the Environmental Assessment process.

Public Consultation meeting details will be communicated with all the registered I&APs.
Registration requests should be forwarded to Excel Dynamic Solutions (Pty) Ltd on the contact details below, before or on 5 June 2025.

Contact: Excel Dynamic Solutions
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ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) NO. 10737 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Ashford Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10737. The EPL covers an area of 85,698.1139 hectares (ha) and is about 120km southwest of Opuwo and about 90km west of Kaoko-otavi Settlement in the Kunene Region. Furthermore, the EPL partly overlies the Okondjombo Communal Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81749 9223 (comments in writing, i.e., SMS or WhatsApp) Email: eias.public@serjaconsultants.com / stefanus@om

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PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) NO. 10736 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (the Project) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Naxos Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. Furthermore, the EPL partly overlies the Okondjombo Communal Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81749 9223 (comments in writing, i.e., SMS or WhatsApp) Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com

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NOTICE OF ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED MINING ACTIVITIES ON THE MINING CLAIMS (MC) NO. 73874 – 73877 AND 74217 – 74222 LOCATED NEAR KHORIXAS IN THE KUNENE REGION

Under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations, the proposed exploration and mining activities on Mining Claims (MC) No. 73874 – 73877 and 74217 – 74222 require Environmental Clearance Certificates (ECCs) from the Department of Environmental Affairs and Forestry (DEAF) before commencement.

The public is notified that applications for ECCs to allow for mining activities on the claims will be submitted to the Environmental Commissioner. The environmental scoping process will be carried out to identify potential positive and negative impacts of the proposed activities and to support the evaluation process for ECCs.

The main target commodity on EPL: Base and Rare Metals and Semiprecious Stones

Proponents: Klaudius Hoaeb
Environmental Consultant: Excel Dynamic Solutions (Pty) Ltd
Public members are invited to register as Interested and Affected Parties to comment/raise concerns or receive further information on the Environmental Assessment process.

Public Consultation meeting details will be communicated with all the registered I&APs.

Registration requests should be forwarded to Excel Dynamic Solutions (Pty) Ltd on the contact details below, before or on 5 June 2025.

Contact: Excel Dynamic Solutions
Pty Ltd office
Email: public@edsnamibia.com
Tel: + 264 61 259 530



NOTICE OF ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON THE EXCLUSIVE PROSPECTING LICENCE (EPL) NO. 9237, 9238, 9239, 9240 AND 9241 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

Under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations, the proposed exploration activities on EPL 9237, 9238, 9239, 9240 and 9241 require Environmental Clearance Certificates (ECCs) from the Department of Environmental Affairs and Forestry (DEAF) before commencement.

The public is notified that applications for ECCs to allow for exploration activities on these EPLs will be submitted to the Environmental Commissioner. The environmental scoping process will be carried out to identify potential positive and negative impacts of the proposed activities and to support the evaluation process for ECC for each of these licences.

□ EPL 9237 located southwest of Warmbad in the //Karas Region

□ EPL 9238 located near of Helmeringhausen, largely in the Hardap Region

□ EPL 9239 located northeast of Rehoboth in the Hardap Region

□ EPL 9240 located near of Helmeringhausen in the //Karas Region

□ EPL 9241 located west of Kalkrand in the Hardap Region

The main target commodity on EPL: Base and Rare Metals, Industrial Minerals, Dimension Stone and Precious Metals

Proponents: Max Kefas Nuseb
Environmental Consultant: Excel Dynamic Solutions (Pty) Ltd
Public members are invited to register as Interested and Affected Parties to comment/raise concerns or receive further information on the Environmental Assessment process.

Public Consultation meeting details will be communicated with all the registered I&APs.

Registration requests should be forwarded to Excel Dynamic Solutions (Pty) Ltd on the contact details below, before or on 10 June 2025.

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CLASSIFIEDS

CALL FOR PUBLIC PARTICIPATION/COMMENTS FOR THE ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED ESTABLISHMENT OF TOWNSHIP IN THE TOWN OF USAKOS, EROMO REGION

The public is hereby notified that an application for an Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed project is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is issued upon approval of an EIA Study.

Name of proponent: Usakos Town Council

Name of the Environmental consultant: Savannah Environmental Consultants Services CC

Project location and description: Usakos Town Council is planning of developing the townland. The development will include establishment of 5 extension with residential erven, streets, institutions, roads, and rezoning.

Interested and affected parties are hereby invited to register in terms of the assessment process to give input, comments, and invited for the public consultation meeting scheduled as follows:

Date :17 May 2025

Time: 09H00

Venue: Usakos Community Hall , Usakos

Registration requests and comments should be forwarded to Savannah Environmental Consultants Services CC on or before the 23 May 2025; Email: savannahconsultants277@gmail.com



NOTICE OF ENVIRONMENTAL IMPACT ASSESSMENT

FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL 9983 IN USAKOS AREA, EROMO REGION.

OUTRUN CONSULTANTS CC HEREBY GIVES NOTICE OF THE ENVIRONMENTAL IMPACT ASSESSMENT FOR THE EXPLORATION ACTIVITIES ON 9983.

The exact location of the project site is highlighted in the Background and Invitation to participate Document (BID). An EIA is being commissioned as required under the Environmental Management Act, 7 of 2007 and Regulations of 2012. Interested and Affected Parties are invited to register and attend meetings as detailed below.

PROPOSER(S): ELDNPAN MINERALS cc

PROJECT ACTIVITIES: EXPLORATION FOR BASE & RARE METALS, INDUSTRIAL MINERALS AND PRECIOUS METALS.

PROJECT LOCATION: USAKOS AREA -EROMO REGION – LOCATION MAPS ARE PROVIDED IN THE BIDS.

PUBLIC PARTICIPATION: A FORMAL MEETING WILL BE HELD ONSITE 10HRS00 ON THE 30TH OF MAY 2025.

VENUE: FARM GOABEB 63

Josiah – 0812 683 578,

E-Mail: outrungreeninfo@gmail.com



BUSINESS SUCCESS CONSULTING

PUBLIC INVITATION

ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED CONSTRUCTION OF A MINI MARKET AT ONATHINGE VILLAGE, ONAYENA CONSTITUENCY IN OSHIKOTO REGION

Notice is hereby given to all Interested and Affected Parties (I & APs) that an application will be made to the Environmental Commissioner in terms of Environmental Management Act No. 7 of 2007 and its regulations (GN 30 of 6 February 2012) for the following intended activity.

Project Name: CONSTRUCTION OF A MINI MARKET AT ONATHINGE VILLAGE IN THE OSHIKOTO REGION

Project Location: ONATHINGE VILLAGE IN OSHIKOTO REGION

Project Description: CONSTRUCTION OF A MINI MARKET AT ONATHINGE ON A 2.1 HA PORTION OF LAND

Proponent: MS. HILMA SHIPANGA

Environmental Consultant: BUSINESS SUCCESS CONSULTING

All Interested and Affected Parties (I & APs) are encouraged to register and provide comments. The Public Meeting will be held on 30 May 2025 at 10h00, Proposed Project Site along B1 Road, 1 km from Onathinge T-junction. If you want to register as I & APs and receive the Background Information Document, please contact our office:

Contact No: 0811404555

Email: bscongwediva@gmail.com

BSI OFFICE AT ERF, 5059 OMATANDO STR. ONGWEDIVA

DEADLINE FOR COMMENTS IS 16TH MAY 2021

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10736 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Naxos Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10736. The EPL covers an area of 87,933.9982 hectares (ha) and is about 180km northwest of Opuwo and about 85km west of Okangwati Settlement in the Kunene Region. EPL-10736 mainly overlies the Marienfluss Communal Conservancy and partly over the Orupembe Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e. SMS or WhatsApp)

Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com



PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10737 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Ashford Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10737. The EPL covers an area of 85,698.1139 hectares (ha) and is about 120km southwest of Opuwo and about 90km west of Kaoko-otavi Settlement in the Kunene Region. Furthermore, the EPL partly overlies the Okondjombo Communal Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e., SMS or WhatsApp)

Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com



PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10738 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Bodmin Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10738. The EPL covers an area of 14,728.1759 hectares (ha) and is about 100km southwest of Opuwo and about 50km west of Kaoko-otavi Settlement in the Kunene Region. The EPL mainly overlies the Otjikongo Conservancy and partly overlies the Otjiu-West Conservancy. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e., SMS or WhatsApp)

Email: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com



7 queer African works of art: new directions in books, films and fashion

IBSON NCUBE
& ANDY CAROLIN

Queer African creatives have been making their mark around the world through a range of forms – books, films, fashion, art, music.

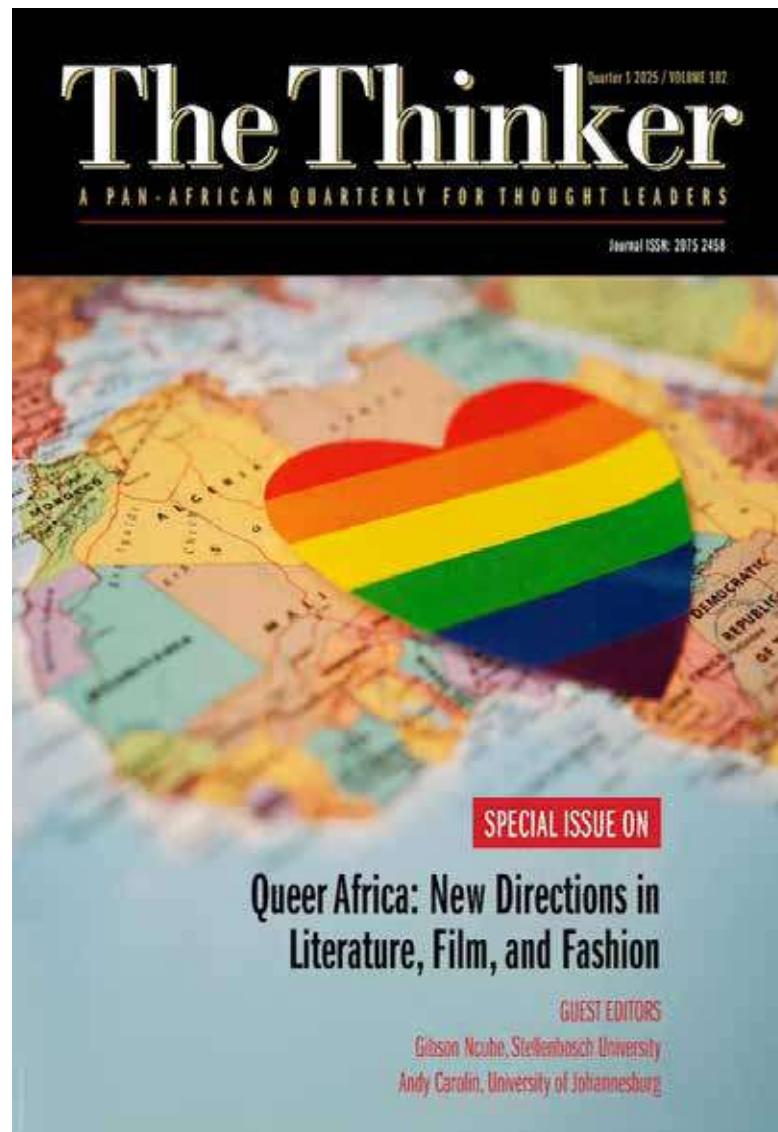
Their work wins awards, sets trends and is studied by scholars. Most research on African queerness, however, comes from outside the continent.

So, we put together a special journal issue to celebrate some of these works that have appeared over the past decade or so. And also to create a space for African and Africa-based scholars to reflect on what's happening on the continent. The contributors don't only examine what these creative works reveal. They also consider how these artists are experimenting with style, voice, genre and imagery to express queer lived experiences.

Here we highlight seven works of art discussed in papers in the special issue – from stories of childhood sexual experiences to bold fashion shows, musical films to maverick lesbian novels. They show the complex ways queer people shape their identities and express desire in very different African settings.

1. Tell Me Your Politik by Nakhane Nakhane is a South African singer, writer, and actor whose work examines the meeting place of queerness and blackness. The song Tell Me Your Politik (from the 2023 album Bastard Jargon), presents Black men in a hypermasculine, military-style training environment. But two of them are quietly and tenderly beginning to express desire for each other. This moment of intimacy is interrupted by aggressive military drills led by a white commanding officer. The song's lyrics insist on the need for ideological alignment ("tell me your politik") before intimacy. This raises questions about love, politics, and consent.

In his article, Gibson Ncube argues that the music video for the song uses touch to explore queerness as a form of resistance. Gentle and intimate gestures between Black men challenge dominant ideas



of Black masculinity. The contrast between caring and violent touch reveals how queerness disrupts systems of domination. Touch becomes political, offering new ways of being and imagining queer futures.

2. Under the Udala Trees by Chinelo Okparanta

Under the Udala Trees is a 2015 novel by Nigerian writer Chinelo Okparanta. It follows Ijeoma, a Nigerian girl discovering her same-sex attraction during the time of the Biafran War. Forced into Bible lessons by her mother to "cure" her queerness, Ijeoma grapples with shame, rejection, and a coerced heterosexual marriage.

The novel critiques religious and political oppression. It imagines resilience and queer love in a hostile environment.

In his article, Wisani Mushwana shows that Under the Udala Trees exposes how Nigerian religious and political leaders weaponise biblical shame to enforce a heteronormative society, inflicting religious trauma in the process.

Ijeoma's bold questioning of the Bible challenges traditional Christian teachings and the use of scripture to shame or judge others. The novel highlights the lack of spaces where queer identity can be affirmed. At the same time, it uses the power of

storytelling to reclaim agency and reimagine queer liberation.

3. The Quiet Violence of Dreams by K. Sello Duiker

The Quiet Violence of Dreams by the late South African novelist K. Sello Duiker was published in 2001. Tshepo is a queer Black man in post-apartheid South Africa. He navigates trauma, identity, and survival. After being raped and robbed, Tshepo finds temporary refuge in a Cape Town male brothel where he explores same-sex intimacy and community.

Ntokozo Wandile Mbokazi and Lucy Valerie Graham think about the novel alongside the controversial South African film Inxeba/The Wound. They argue that the book and film challenge traditional ideas of Africanness. Tshepo's story is a postcolonial coming-of-age tale which is shaped by disillusionment as the protagonist tries to fit into society.

Racial and class tensions weaken the solidarity of queer people. This shows the limits of freedom in post-apartheid South Africa and how enforcing traditional masculinity often involves violence.

4. Lagos Space Programme by Adeju Thompson

Lagos Space Programme is a Nigerian fashion label created by designer Adeju Thompson. The brand combines west African fabrics and non-binary gender expression to challenge traditional ideas of masculinity. Through fashion, it connects Yoruba beliefs, queer politics, and bold design to celebrate the fluidity of gender. Khaya Mchunu and Isaiah Negedu show how the label uses clothing to question to imagine freer, more inclusive futures. Rather than looking for acceptance by fitting in, Lagos Space Programme insists on visibility and creative self-expression. It reclaims African traditions while disrupting fixed social norms.

5. Nine Pieces of Desire by Idza Luhumyo

The past decade has seen the publication of several important anthologies of queer African short

stories.

Two stories in particular are given attention in the special issue. Kenyan writer Idza Luhumyo's 2017 story Nine Pieces of Desire is about 10-year-old Mariam, who lives in a Kenyan Muslim community. It explores her silent rebellion against patriarchal and religious norms after a fleeting same-sex encounter with her friend Grace.

6. Plums by Kharys Laue

South African writer and editor Kharys Laue's 2018 short story Plums recounts Chris's childhood memory of a tender moment with her friend Gloria on a South African farm. This is contrasted with her adult struggles in a heteronormative and racist society. Leila Hall argues that these two stories disrupt the harmful binary of "innocent children/perverse homosexuals" by portraying childhood same-sex desire as natural and consensual, outside of adult coercion. They push back against the false idea that being queer means being dangerous. The young narrators help us see how systems of oppression work in everyday life.

7. Kanarie by Christiaan Olwagen

Kanarie is a 2018 South African film by Christiaan Olwagen. It follows Johan Niemand, a young gay man conscripted into the apartheid-era army in the 1980s. Under the racist system, white men were conscripted to help maintain the government's power. Selected for a military choir, "the Canaries", Johan deals with his sexual identity within a hypermasculine space. The film blends musical elements and melodrama to explore his inner conflict, his love for pop culture, and a tentative romance with another recruit. All in the face of conservative Christian nationalism.] Andy Carolin argues Kanarie is more than a coming out story. It uses melodrama to imagine a queer way of being. By merging fantasy with realism, it shatters ideas of good versus evil or right versus wrong. -*The Conversation*

*Gibson Ncube is a Senior Lecturer at Stellenbosch University and Andy Carolin is an Associate Professor of English Literature, University of Johannesburg

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10742 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Hildesheim Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10742. The EPL covers an area of 73,402.1031 hectares (ha) and is about 110km west of Opuwo and about 90km northwest of Kaoko-otavi Settlement in the Kunene Region. The EPL overlies the Marienfuss and Orupembe Communal Conservancies. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Seria Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e., SMS or WhatsApp)

Email: eias_public@seriaconsultants.com / stefanus@seriaconsultants.com

PUBLIC NOTICE: A CALL FOR PARTICIPATION & COMMENTS SUBMISSION

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10740 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION

The public is hereby notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed exploration on the EPL (*the Project*) is a listed activity in the EIA Regulations that cannot be undertaken without an ECC, which is subject to an EIA Study, approval of the EIA Scoping Report, and an Environmental Management Plan.

Project Proponent: Congleton Investments (Pty) Ltd

Project Nature and Location: Upon issuance of the ECC and subsequent EPL certificate (rights), the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities on EPL-10740. The EPL covers an area of 48,836.2195 hectares (ha) and is about 90km northwest of Opuwo and about 30km west of Okangwati Settlement in the Kunene Region. The EPL overlies the Marienfuss and Ojtjandja Communal Conservancies. Please note that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, as a mining license would need to be applied for should exploration be successful.

Environmental Assessment Practitioner: Seria Hydrogeo-Environmental Consultants CC

The public is invited to register as Interested and Affected Parties (I&APs), submit comments, and receive further information on the EIA process (including the BID). **The deadline for registration as an I&AP and submission of comments, issues, or concerns is Friday, 20 June 2025.**

Contact Persons: Ms. Fredrika Shagama and or Mr. Stefanus Johannes

Mobile No.: +264 (0) 81 749 9223 (comments in writing, i.e., SMS or WhatsApp)

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**Appendix D: Minutes from the
Consultation Meetings with key
stakeholders / interested & affected
parties (I&APs)**

Date: 21 June 2025

COMBINED CONSULTATION MEETING MINUTES

Environmental Impact Assessment (EIA) Study - The Proposed Exploration Activities on Exclusive Prospecting Licenses (EPLs) No 10736, 10737, 10740, 10742 in the Kunene Region - Application for Environmental Clearance Certificate (ECC)

Date: Saturday, 21 June 2025

Time: 9:20 to 13:00

Venue: Marienfluss Community Campsite

Project Proponent: Hildeshein Investments Pty Ltd (**EPL-10742**), Ashford Investments Pty Ltd (**EPL-10737**), Naxos Investments Pty Ltd (**EPL-10736**), Congleton Investments Pty Ltd (**EPL-10740**)

Meeting Attendance

The consultation meeting had an attendance of twenty-five (25) people, including three EAPs from Serja HGE Consultants, and one representative of the four proponents. The signed attendance register is attached hereto.

1. INTRODUCTION AND WELCOMING

Mr. Stefanus Johannes (Environmental Assessment Practitioner / Consultant) from Serja HGE Consultants opened the meeting and thanked the meeting attendees for making time. Mr. Johannes then presented the meeting agenda, which is based on the requirements of the 2012 EIA Regulations: Environmental Management Act No. 7 of 2007 on Public Consultation, Sections 21 to 24. Copies of the Background Information Document (BID) were distributed among the attendees for self-reading and follow throughout the meeting proceedings. The attendance register was circulated for attendees to sign the meeting attendance as proof of consultation to be appended to the EIA Report.

To ensure that all meeting attendees felt included and able to participate with a well-informed background of the meeting agenda, provision was made for the translation of meeting proceedings from English to Otjiherero/Otjizemba and vice versa by local community leaders for meeting attendees who do not speak or understand English.

2. MEETING AGENDA AND PRESENTATION

The Environmental Assessment Practitioner (EAP) / Mr. Johannes presented the agenda of the meeting, which included the following main points:

2.1 Explanation of what an EIA is, its Process, and the Public Role in the Process

Ms. Johannes explained that the EIA process is done in compliance with the EMA, as the proposed prospecting and exploration works are one of the listed activities that cannot be undertaken without applying and obtaining environmental clearance certificates (ECCs) from the Environmental Commissioner. The issuance of ECCs is subject to an EIA process and EIA Scoping Reports, as well as individual Environmental Management Plans (EMPs). The EIA process requires that consultation meetings be held with the stakeholders/affected and or interested community members where the project activities would be undertaken.

Furthermore, the EPLs are in an application stage with the Ministry of Industries, Mines and Energy (MIME), and before the rights or the certificates of EPLs can be issued to the proponents, individual ECCs need to be obtained first and submitted to the Mining Commissioner to consider the EPL applications.

2.2 Brief Description of the Project

A brief description of the planned project activities was presented as per the provided BID copy, and Mr. Johannes emphasized the importance of understanding the conducted EIA Study.

2.3 Presentation of Potential Project Impacts

To ensure transparency and that the attendees understand both sides of the proposed project activities, Mr. Johannes also presented the potential pre-identified positive and negative environmental impacts anticipated from the proposed project activities. This will establish the basis for mitigation measures to be developed for the proposed project.

2.4 Public Open Discussion (Interactive Session)

The meeting attendees were provided with an opportunity to ask questions and/or raise concerns about the proposed project activities to be incorporated into the meeting minutes and used as the basis for the compilation of the EIA Report and Draft EMP. The key comments and issues made in the meeting were recorded and noted for consideration and inclusion in the EIA Report. These issues and comments are presented in Table 1.

Table 1: Issues, suggestions, and comments received during the Consultation Meeting at Ou-Cordon on the 21st of June 2025 (at 9:20)

| No. | Name of the speaker/commenter & Capacity | Comment/Issue/Suggestion | Response provided by: |
|-----|--|---|---|
| 1. | Commentor 1 | Normally, when we are called to sit in these meetings, there is food. Is there food, or will we just sit here like this? Sometimes we are also given something. Will you give us something? | Mr. Morne du Toit (proponents' representative): We have brought them some bread and tea for when we are done with the meeting proceedings. |
| 2. | | What about money or allowance? | Mr. Morne du Toit: Unfortunately, there is no money for that right now. |
| 3. | | Is there a difference when you are doing consultation meetings in commercial or communal land? | Mr. Morne du Toit: When we have meetings in commercial lands, there is no food or things of that nature. We just |

| No. | Name of the speaker/commenter & Capacity | Comment/Issue/Suggestion | Response provided by: |
|-----|--|---|---|
| | | Because the issue here is about allowance, are you willing to give us any allowance? A follow-up question is whether this allowance, if any, is applicable in commercial or communal land? | <p>simply meet with landowners and provide water at best, and proceed with the meeting.</p> <p>Mr. Gideon Kalumbu (proponents' representative): We need to understand that these are just consultation meetings. We brought as little as we could at this stage for appreciation. However, once we get the certificates, we will come back to the community to tell them that we have been granted the ECC and the license to explore. From there, we now have a community meeting. If we have to go into a memorandum of understanding, that is something that will be discussed by both parties.</p> |
| 4. | Commentor 2 | When you say bread, it sounds like each person will get a slice or two, and then everyone will be sitting here for most of the day. On top of that, there is no money that will be given to us, so why are we having this meeting if there is no money? What are we talking about? | <p>Mr. Morne du Toit: We did not know about any allowance because we have not encountered this before with other EIA meetings we held before.</p> |
| 5. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | If there is no food, some say we can continue; others are still concerned. | |
| 6. | Commentor 3 | If the discussion is here, and maybe there are some missing members of the traditional authority, and we are talking about land. Are we just going to listen to this information? This could mean we cannot accept, since this issue is affecting the land, and TAs must be present. If we do not have all the TA members here, it means we are just listening, and then after that, we will need to have another consultation. | <p>Mr. Stefanus Johannes: We understand the concern about the availability of all TA members, but it is not always possible to have everyone available at the same. Therefore, in such cases, we always respectfully request the available representatives to feed back to the colleagues who could not attend the meeting for a common decision-making. However, we hope that when the proponents return, should they get granted the certificates and rights to the EPLs, the absent TA members would be in the engagements.</p> |
| 7. | Commentor 4 | I propose we listen and if we can gauge and see that this issue requires the | |

| No. | Name of the speaker/commenter & Capacity | Comment/Issue/Suggestion | Response provided by: |
|-----|--|---|--|
| | | whole community, then we put it at rest; if not, then we can proceed. | Mr. Stefanus Johannes: This is noted. Thank you. |
| 8. | Commentor 5 | The meeting should continue, and then we will take this information to the masses to decide what should happen in terms of whatever the request is. | |
| 9. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | The way forward is that you will be given a chance with each EPL. This is because the setup, in terms of the presence or absence of the responsible TA members, which is the main issue here, will be listening as senior councillors and leaders, but it needs to go through the TAs. With that, if there is a need for another meeting or mobility meeting, then you can come back. | Mr. Morne du Toit: This is just a reminder that we will need consents from the TAs and the conservancies. We address this respectively because I believe the TA looks after the land, and the conservancy looks after the conservancy areas. Mr. Stefanus Johannes: Thank you for the floor. This first EPL is number 10736. This is the license area under application for exploration and prospecting activities. |
| 10. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | Before you continue, is there a map that indicates the villages? They want to see the EPL in relation to their villages and lands? | Mr. Stefanus Johannes: Yes, we have colour printouts of locality maps. We are just not sure about the reliability of the data, as some localities/ villages might not be up to date in the database. However, we will update these for the reporting stage. |
| 11. | Commentor 6 | We have heard about the consent letters that are required, we have an understanding of the area projected on your maps, and the conservancy is a part of the land that is managed by the TA. My input on this is that the TA's letter must be written first, then the conservancies, and after that, we are probably going to be meeting so that we can present this consent. | Mr. Stefanus Johannes: This is noted. |
| 12. | Commentor 7 | Additionally, there are areas which we have allocated for People's Park, some are for hunting and some for wildlife breeding. We will discuss this matter, considering these factors and their locations in relation to your EPLs. | Mr. Stefanus Johannes: This is noted. We will obtain data from the IRDNC and or NACSO to map the conservancy zones. |
| 13. | Commentor 8 | I want to be straightforward. One of your EPLs goes straight through our | Mr. Stefanus Johannes: This is noted. |

| No. | Name of the speaker/commenter & Capacity | Comment/Issue/Suggestion | Response provided by: |
|-----|--|---|--|
| | | wildlife co-breeding area, which is also where our livestock grazes. We have also allocated land there for the people's park. We have seen in other people's areas what damage mining can cause to the environment. I can tell you now that our communities will reject these projects, but we will take it up with them nonetheless. | |
| 14. | Headman of Okondjombo Village | In this EPL, our area is also included. I will not say that you should come or not; we know very well that mining causes destruction. We have listened, now go and come back, when we are with the community, we will be able to give you a direction. | Mr. Stefanus Johannes: This is noted. |
| 15. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | They urge you to go to each conservancy, not joint meetings with all the people under one tree, and when you go, do not take too long to come back. | Mr. Morne du Toit: The purpose of the meeting is to exactly understand, for example, from Sanitatas, they are meeting in the areas, and if they could give us the areas, then we can plot them on the map already. The mapping of these is needed for the EIA. It is the same with the areas that the conservancy has allocated for the park, which they give to environmental practitioners. This is why they are here to have more ground information, for example, mapping of wildlife breeding grounds for birds or hunting areas, etc. I mean, the conservancy for hunting is not an area, but the breeding for the birds that I understand, so we would like that information, which is the purpose of this meeting, to share that information. |
| 16. | Commentor 9 | Should we give you now or when you come back for the community meetings? | Mr. Morne du Toit: The consents? |
| 17. | Mr. Lucky | No, the information you need is in terms of those specific locations. | Mr. Morne du Toit: If it is readily available, we would appreciate it if we could get it now or sooner after the meeting. |

| No. | Name of the speaker/commenter & Capacity | Comment/Issue/Suggestion | Response provided by: |
|-----|--|--|--|
| 18. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | The problem is maps; these people cannot identify their areas from your maps, so they are also just assuming. | <p>Mr. Morne du Toit: Everybody needs to understand that we are not mining. All we want to do is see if there are any minerals in these areas. This is very important to understand. One usually starts with a drone, without touching the ground. At this stage, we do not hurt the trees, and if there is something, then we only drill a hole, and the material we find in the hole is taken to see if it has value for further exploration. Should we find something of value (economically feasible), we would then apply for a mining license or licenses. Everything can take about five to ten years, but it is a process. I understand the concerns that mining is destructive and we agree. However, at this stage, we are only proposing for prospecting and exploration and consider the community by creating jobs for locals who would be fortunate in the project. This will require working in a good relationship with each other, and this is what we are trying to establish. Hence, we would need the data on the conservation area's zonation.</p> |
| 19. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | The protected area is not a problem, but for them to say yes or no to certain areas is challenging because the maps are not giving them enough information. Yes, so for them to agree to something they are not sure of is a concern. Now we are going to be sitting with the community, saying maybe this and that. So, the map is not quite useful for them to make decisions. | <p>Mr. Morne du Toit: The point is taken. We will acquire the conservation zonation data and create these maps, including villages as far as we can.</p> |
| 20. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | Once those maps are ready, we share them with the community when they discuss these EPLs. When you initiate meetings after that, they have looked at them and can make appropriate decisions and give you accurate information | <p>Mr. Gideon Kalumbu: I think that is the next approach. What is also important, before we all leave, from our side, is to get the contacts of the people who can either be from the conservancy team or the TAs.</p> |

| No. | Name of the speaker/commenter & Capacity | Comment/Issue/Suggestion | Response provided by: |
|-----|--|---|---|
| 21. | Commentor 10 | Before we say a lot of things, we are only five here. Many of the people are not here. Right here, where we are, we cannot make a decision. What will be best is for you people to go there, plan this accordingly, and arrange for some meetings with them, whereby you will be going into the areas, since you have a GPS. Take a trip to that site, that area, the specific one that you are talking about, and then they will tell you which areas have been reserved and for what. Then later, you can call up a meeting with the community. | Mr. Stefanus Johannes: This is noted. |
| 22. | Commentor 11 | Just to add on that, be informed that this area, this specific area that you are talking about here, has already been allocated for wildlife. So then do not think about it. it is a co-wildlife area. It is a wildlife zone. | Mr. Morne du Toit: This noted. |
| 23. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | Every conservancy has a zonation map, which shows all these wildlife areas, breeding grounds, and tourism areas. It will help you. | Mr. Morne du Toit: Yes, then we can plot it, and maybe we will not have to come back again, because if there is no area, we would have access to or given consent. |
| 24. | Commentor 12 | It was explained that people would drive with you around this EPL, and then they would tell you whether it was okay or not. | Mr. Morne du Toit: Yes, we either get a map with all these villages and areas, or we come and drive. |
| 25. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | I am not sure I have a map. Have you checked with NACSO? | Mr. Gideon Kalumbu: We have, but their online maps are outdated. |
| 26. | Mr. Rudolf Tjaveondja (Conservancy Facilitator) | We have an NACSO that we are using now for game counts. Maybe it is classified information, and that is why you do not have it. We are using the NACSO maps for our annual game counts. I would also like to visit the villages, or maybe talk to them and see. | |

3. FINAL REMARKS AND CONCLUSION OF THE MEETING

3.1 What is the way forward after this meeting?

Mr. Stefanus Johannes thanked the attendees for their crucial input through comments and for raising their concerns. He indicated to the attendees that all their comments, concerns, and inputs had been noted down for consideration and for addressing in the EIA Report, as well as incorporating their recommendations into the draft Environmental Management Plan (EMP).

Furthermore, Mr. Stefanus Johannes informed the attendees that the draft meeting minutes, EIA Report, and the EMP will be shared with them for review and further comments. These documents will be made available through the emails provided on the attendance register.

Once the review of the reporting documents is completed, the documents will be finalized and submitted to the Environmental Commissioner at the Department of Environmental Affairs and Forestry (DEAF) for evaluation and consideration for an ECC.

The meeting adjourned at 13:00 (1:00 PM).

STAKEHOLDER/PUBLIC CONSULTATION MEETING ATTENDANCE REGISTER

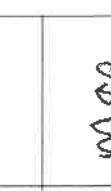
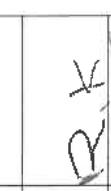
**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING
LICENSE (EPL) NO. 10737 LOCATED SOUTHWEST OF OPUENWO IN THE KUNENE REGION: APPLICATION FOR AN ECC**

Project Proponent: Asford Investment (Pty) Ltd

Date & Time: 21-06-2025

Venue: Marufhass Community Camp Site

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|----------------------------|-------------------------------|----------------|---|-------------------|
| 1. | | | | | <i>Ecological</i> |
| 2 | Stephens Jhannes | Stephens Consultants | 0811000570 | stephane@serjaconsultants.com chiefluckie@gnow.com | <i>SD</i> |
| 3 | hucky Kasadua | TRDNC | 08171135544 | | <i>Tinku</i> |
| 4. | Kapahue Jininge Okondjombo | | | | |
| | Rikungu Kombina Okondjombo | | 0813363785 | rikungu@gmail.com | <i>RK</i> |

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|---------------------|-------------------------------|----------------|------------------------|---|
| 5 | Uendi Timinge | Okonjombo | 0818672768 | |  |
| 6. | Ryanne Tharo | Okonjombo | | |  |
| 7. | Juxpe Timbum | Okonjombo | | |  |
| 8. | Yende Kengoe Amara | Sanifata | 061 | |  |
| 9. | Tonahere mukene | Sanifata | | |  |
| 10. | Maifingi Tambo | Sanifata | 08186940129 | |  |
| 11. | Rongor Kusungo | Sanifata | 0817745115 | |  |
| 12. | | | | | |
| 13. | | | | | |

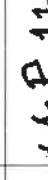
STAKEHOLDER/PUBLIC CONSULTATION MEETING ATTENDANCE REGISTER

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING
LICENSE (EPL) NO. 10740 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION: APPLICATION FOR AN EEC**

Project Proponent: Longlemon Investments (Pty) Ltd

Date & Time: 21-05-2025

Venue: Mareenfluss Community Centre Site

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|---------------------|-------------------------------|----------------|-------------------------|---|
| 1. | Komenya Tshwua | SERJA consultants | 0816068269 | KomenyaTshwua@gmail.com |  |
| 2 | Lucky Kaduna | TRSLC | 0817113544 | chieffuckye@gmail.com |  |
| 3 | Phelise Tambi | Ofimungao | 0812339375 | mu |  |
| 4. | Okonjerwa Heriba | Ofimungao | 0812208111 | u.P. Heriba |  |

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|---------------------|-------------------------------|----------------|------------------------|---|
| 5. | Kavonredu Huerta | Chirungwa | 081479656 | | K.H |
| 6. | Jazemba Tshibya | Jizwanya | 0816816070 | |  |
| 7. | | | | | |
| 8. | | | | | |
| 9. | | | | | |
| 10. | | | | | |
| 11. | | | | | |
| 12. | | | | | |
| 13. | | | | | |

STAKEHOLDER/PUBLIC CONSULTATION MEETING ATTENDANCE REGISTER

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING
LICENSE (EPL) NO. 10736 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION: APPLICATION FOR AN ECC**

Project Proponent: Nexus Investments (Pty) Ltd

Date & Time: 21-06-2025

Venue: Marienfluss Community Campsite

| No. | Full Name & Surname | Name of Institution/Village | Contact Number | Email Address (if any) | Signature |
|-----|-----------------------|-----------------------------|----------------|------------------------|-----------|
| 1. | Hercy Kasanda | IRDNC | 0817113544 | chiefhercyk@gmail.com | SD2 |
| 2 | Muhwee Jambini | Marienfluss | 0812339375 | / | Mu |
| 3 | Kazondra Henka | Marienfluss | 081 | | |
| 4. | Kafenomwa T. Orupembe | | +26481491442 | ka.kunamwata@gmail.com | Orupembe |

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|---------------------|-------------------------------|----------------|------------------------|-----------|
| 5 | Kewa Jyoti Binda | Impembe | n/a | — | + |
| 6. | Carozengulu T. | Impembe | n/a | n/a | |
| 7. | Umapeng T. | Impembe | n/a | n/a | |
| 8. | Caroljens | Impembe | n/a | n/a | |
| 9. | | | | | |
| 10. | | | | | |
| 11. | | | | | |
| 12. | | | | | |
| 13. | | | | | |

STAKEHOLDER/PUBLIC CONSULTATION MEETING ATTENDANCE REGISTER

**ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING
LICENSE (EPL) NO. 10738 LOCATED SOUTHWEST OF OPUWO IN THE KUNENE REGION: APPLICATION FOR AN ECC**

Project Proponent: Beamin Investments (Pty) Ltd
 Date & Time: 17/06/2025
 Venue: Otjiwarongo Conservancy Office

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|-------------------------|-------------------------------|----------------|------------------------|--------------------------------|
| 1. | Mr. Cander K. Sikongo | | | | K. R. |
| 2 | Kaukonbenue | Otjiu West | 0813515252 | | <i>Mr. K. R.</i> |
| 3 | Rudolph Yavonda RDNC | | 0814835571 | ignitionr@gmail.com | |
| 4. | Chicem Mupungu Ojilongo | | 08147331462 | | <i>Chicem Mupungu Ojilongo</i> |

SERJAHGE
CONSULTANTS

| No. | Full Name & Surname | Name of Institution / Village | Contact Number | Email Address (if any) | Signature |
|-----|---------------------|-------------------------------|----------------|------------------------|-----------|
| 5 | Jambiro mazangsepi | Otiu-west | 0815556644 | | |
| 6. | | | | | |
| 7. | Mbunguha Kekauhara | Otiikongo Conservancy | | | |
| 8. | Lukuna Saratiel | Otiu-West | | | |
| 9. | Koruhama Yatituvai | Otiikongo Conservancy | | | |
| 10. | Ijonehi Hianisema | Otiikongo Conservancy | | | |
| 11. | Memory Mungundu | The Ecology of Mind | 08130014205 | unamu@gmail.com. | |
| 12. | | | | | |
| 13. | | | | | |

Appendix E: Original EIA Public Poster

PUBLIC NOTICE



Serja Hydrogeo-Environmental
Consultants CC

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 10742 LOCATED NORTHWEST OF OPUWO IN THE KUNENE REGION: AN APPLICATION FOR THE ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR PROSPECTING AND EXPLORATION ONLY

The public is notified that an application for Environmental Clearance Certificate (ECC) will be submitted to the Environmental Commissioner at the Ministry of Environment, Forestry & Tourism (MEFT) as required under the Environmental Management Act No. 7 of 2007 and its 2012 EIA Regulations. The proposed activities (prospecting and exploration) on Exclusive Prospecting License (EPL)-10742 are listed activities that cannot be undertaken without an ECC from the MEFT. The application for the EPL was made to the Ministry of Industries, Mines and Energy (MIME) on the 1st of April 2025, as shown on the Namibia Mines and Energy Portal ("Pending ECC") - <https://portal.mme.gov.na/page/MapPublic>. The ECC is subject to an EIA Study, which is currently being carried out. Should the EIA Study be approved, the ECC issued and obtained from the MEFT, and the ECC will be submitted to the MIME for consideration of granting the EPL rights (EPL certificate).

Project Proponent: Hildeshein Investments (Pty) Ltd

Environmental Assessment Practitioner (Environmental Consultant): Serja Hydrogeo-Environmental Consultants CC

Type of proposed Activity and Location: Upon issuance of the ECC by the Environmental Commissioner at the MEFT and subsequent EPL certificate (rights) by the MIME, the Proponent will plan for and commence with the proposed prospecting and exploration of mineral commodities potentially occurring on the EPL. The EPL is about 110km west of Opuwo and about 90km northwest of Kaoko-otavi Settlement in the Kunene Region. The EPL overlies the Marienfluss and Orupembe Communal Conservancies, covering an area of 73,402.1031 hectares (Ha) - please refer to the maps below. The EPL has potential for these commodities: Base & Rare Metals, Dimension Stone, Industrial Minerals, Non-Nuclear Fuel Minerals, Nuclear Fuel Minerals, Precious Metals, and Semi-Precious Stones. **It should be noted that this EIA Study is for exploration activities ONLY and not mining because mining cannot be done on an EPL, i.e., the Proponent would need to apply for a mining license after exploration (if found to be economically feasible). A separate EIA Study would be conducted to apply for a mining license, i.e., to convert the EPL into a mining license.**

Members of the public are therefore invited to register as Interested and Affected Parties (I&APs) to comment/raise concerns or receive further information on the EIA Study, such as the background information document (BID). The consultation meeting is scheduled as follows:

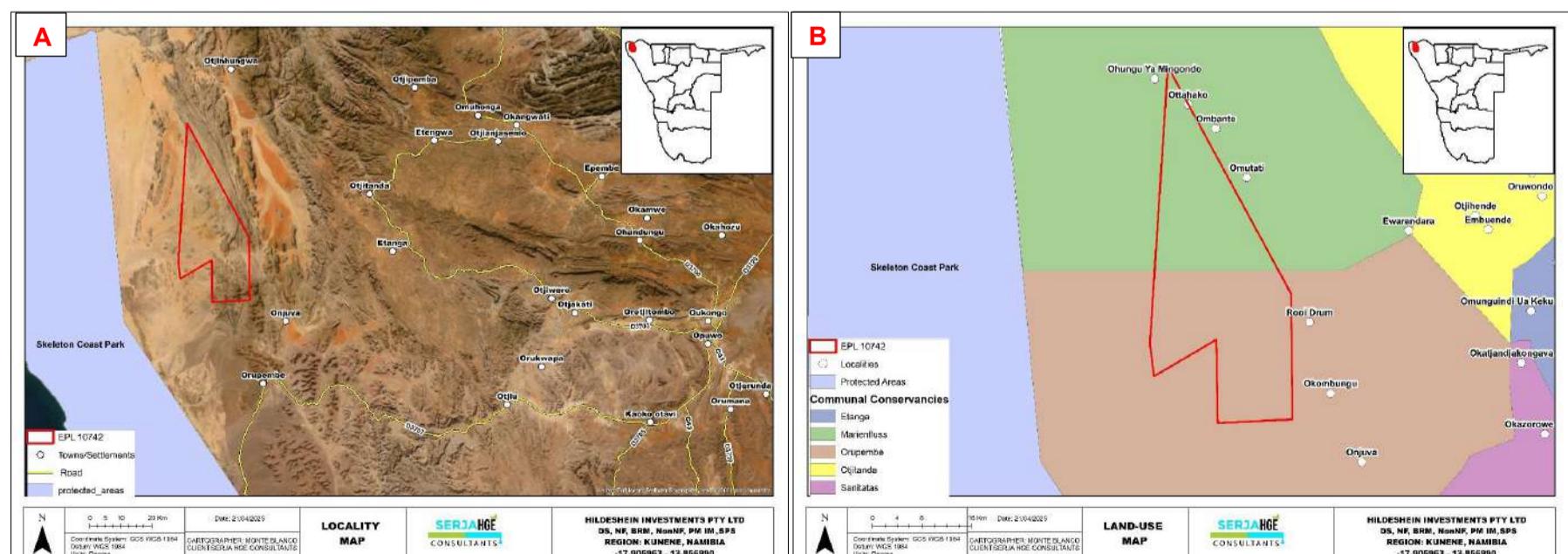
Registration or comments' **submission should be done in writing** to the contact details below before or on **Friday, 20 June 2025**.

Contact Persons: Ms. Fredrika Shagma OR Mr. Stefanus Johannes (Environmental Assessment Practitioners)

Mobile No: +264 81 749 9223 (by sending an SMS or WhatsApp for easy recording of comments)

E-mail: eias.public@serjaconsultants.com / stefanus@serjaconsultants.com (direct email or scanned/photos of legible handwritten letters)

A: Locality map of EPL-10742 northwest of Opuwo in the Kunene Region, and B: Conservancy map (significant land use) overlain by the EPL



Appendix G: I&AP Comments and Responses (consolidated comments for EPL-10736, 10737, 10738, 10740 and 10742)

Appendix G1: Comments as received from I&APs

P O Box 604
4 Marien Ngoubi Street
Windhoek
Namibia

Tel: Int +264 61 223356
Fax: Int +264 61 234953
E-mail: info@lac.org.na
Web: www.lac.org.na



Toni Hancox (Director)
Corinna van Wyk
Chloe Ashley Brandt

LEGAL ASSISTANCE CENTRE

Recipient of the UNICEF Maurice Pate Human Rights Award – 1997
JP Karuaihe Human Rights Excellence Award – 2008, 2010, 2014, 2016, 2020 and 2023 and Social Responsibility Award

24 October 2025

Ref EPLs 10736, 10737, 10738, 10740 & 10742 Kunene Region,

Messrs.
Serja Hydrogeo-Environmental Consultants CC
P. O. Box 27318,
Windhoek,
Namibia

eias.public@serjaconsultants.com

Dear Ms. Shagama,

CONSOLIDATED COMMENTS ON DRAFT ENVIRONMENTAL SCOPING ASSESSMENT REPORTS FOR EPLS 10736, 10737, 10738, 10740 & 10742 (KUNENE REGION, NAMIBIA)

The Legal Assistance Centre Namibia appreciates the opportunity to provide consolidated comments on the Draft Environmental Scoping Assessment (ESA) Reports and Environmental Management Plans (EMPs) for the proposed exploration and prospecting activities under Exclusive Prospecting Licenses (EPLs) 10736, 10737, 10738, 10740, and 10742 in the Kunene Region. We acknowledge the extensive work that has gone into these documents and that the current applications are for exploration activities only, not mining. As noted in the reports, mining cannot occur under an EPL without a separate mining license and a full Environmental Impact Assessment (EIA) for mining. We concur that any future transition to mining would require a new EIA process and Environmental Clearance Certificate (ECC) specific to mining operations. Our comments below are offered in the spirit of constructive feedback, aiming to strengthen the assessments and ensure they fully address regulatory requirements, environmental protections, and community interests at this exploration stage.

1. Introduction and context

The five EPLs in question are all situated in north-western Kunene Region, a remote area characterized by sensitive arid ecosystems and communal conservancies. We understand the Proponents (Naxos Investments, Ashford Investments, Bodmin Investments, Congleton, and Hildeshein) intend to carry out phased exploration programs involving non-invasive methods (desktop studies, mapping, geophysical surveys) followed by invasive techniques such as soil/rock sampling, trenching, and drilling. Each EPL has a unique geographical footprint and community context, which we summarize in Section 7 of this letter.

We note positively that the ESA reports clearly state their limited scope (exploration only) and outline the regulatory pathway should an economically viable discovery be made (i.e., application for a mining license, feasibility study, and a full EIA with an approved ECC for mining before any mine development). These assurances set the proper expectation that approval of exploration activities in no way guarantees or pre-authorizes mining, and any mining proposal would undergo rigorous separate assessment.

However, even exploration activities can have significant short-term environmental and social impacts if not carefully managed. Moreover, decisions and data from this exploration phase will lay the foundation for any future mining proposals. It is therefore critical that the scoping assessments and EMPs for exploration are thorough, compliant with all legal requirements, and sensitive to the local environmental and community context. Our comments focus on key cross-cutting themes, followed by EPL-specific observations:

- Exploration-Phase Environmental Disturbances (temporary but important impacts and rehabilitation needs)
- Adequacy of Baseline Data (to inform impact assessment now and any future assessments)
- Legal Compliance Issues (with emphasis on the Water Resources Management Act 11 of 2013)

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- Cumulative Impacts (considering multiple overlapping EPLs in the same conservancy regions)
- Community Engagement and Information Access (consultation process and stakeholder rights)
- Framework for Transition to Mining (ensuring clarity on future steps and commitments)

We trust that these comments will be considered in finalizing the ESA reports and EMPs. We are prepared to engage further or clarify any points as needed.

2. Exploration Activities – Impacts and Mitigation

While exploration is generally short-term as a general rule, it should be noted that the Minister, in terms of section 71(2) of the Minerals (Prospecting and Mining) Act, has discretion to renew an EPL for a third or subsequent periods of time, which may extend the exploration phase beyond typical durations. Nevertheless, the activities proposed – including off-road vehicle movement, excavation of trenches, drilling of boreholes, and establishment of exploration camps – will disturb the environment in the short term and pose risks that must be managed:

- Soil Disturbance and Erosion: Clearing of tracks, trenching, and drill pad preparation will disturb soils. The ESA reports themselves identify physical soil disturbance leading to compaction and erosion as a key negative impact. We concur and stress the importance of strict topsoil management and progressive rehabilitation. All trenches and pits should be fenced during use and backfilled immediately after sampling to restore natural contours. Erosion control measures (such as diversion of runoff, no excavation on steep slopes) should be detailed in the EMP.
- Biodiversity and Habitat: The project areas lie in a unique desert and savannah transition zone with wildlife that includes desert-adapted elephants, giraffe, antelope, and predators, as well as sparse but specialized flora. Even limited

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exploration activities can disrupt local fauna and flora. The draft reports list impact on local biodiversity and habitat disturbance as potential issues. Particular concerns include:

- ✓ Wildlife disturbance and safety: Noise from drilling, dust, and human presence can drive away wildlife or alter their movement patterns. Notably, communal conservancies rely on wildlife for tourism and trophy hunting income, so any disturbance has socio-economic as well as ecological ramifications. We urge that exploration schedules avoid sensitive periods such as wildlife calving seasons and that a wildlife monitoring program be instituted. Open trenches or drill holes must be covered or barricaded to prevent injuries to animals including livestock. If desert elephants' frequent certain corridors in the EPL areas, operations should adjust to avoid blocking their access to water or forage this is especially relevant for EPL-10740 which may lie in a wildlife corridor between conservancies.
- ✓ Vegetation: The arid flora is fragile; removal of vegetation for tracks or camps should be minimized. No off-road driving outside demarcated exploration areas should be permitted to avoid unnecessary damage to vegetation crusts. The EMP should commit to no introduction of invasive plant species (through vehicle tires or imported materials) and to rehabilitating any compacted areas to enable regrowth.
- Water Resources Impact: Water is extremely scarce in Kunene, and any use or potential contamination of water resources is a critical issue. We note that exploration might involve water for drilling (for dust suppression or drilling mud) and there is mention of possibly abstracting water either by tanking from settlements or directly from the Kunene River. Potential impacts include over-abstraction of local water sources and pollution of surface/groundwater from accidental spills. We elaborate on legal compliance in Section 4, but here emphasize: All water abstraction for the project must be sustainable relative to

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local supply and done with appropriate permits. Over-abstraction could deprive local communities or wildlife of water, especially if multiple projects draw from the same source. There is risk of pollution (fuel or oil spills, drilling fluids, etc.) reaching watercourses or groundwater. Although groundwater in parts of these EPLs is reported to be limited (rocky aquifers with low yield), any perched aquifers or ephemeral river pools must be protected. The EMP should specify spill prevention measures and immediate cleanup protocols. No toxic substances should be left on site. Drill cuttings and wastewater should be contained in sumps away from any drainage lines and properly disposed of.

- Air Quality and Noise: Dust generation from driving on dirt tracks and drilling can locally compromise air quality, and noise from drill rigs or vehicles may disturb humans and animals. Mitigation should include dust suppression on access routes (using water sparingly and under permit) and maintaining mufflers on generators. Given the remoteness, noise will primarily affect wildlife; nonetheless, any homesteads in the vicinity (within a few kilometers) should be notified ahead of noisy activities.
- Visual and Landscape Impacts: By nature, exploration leaves a smaller footprint than mining, but visual impacts can arise from cleared drill pads, temporary camps, or lingering evidence of trenches. The draft ESA identifies “visual impacts due to unrehabilitated exploration sites” as a concern. We agree and underscore that full rehabilitation after each phase is non-negotiable. All equipment, litter, and signage should be removed. If any access roads/tracks were created, they should be scarified or otherwise returned to a natural state unless the conservancy or landowner requests to keep them for their use. The goal should be that, a short time after exploration, a casual observer cannot tell the site was disturbed.
- Occupational and Community Health & Safety: Exploration works introduce open pits, drilling rigs, and increased traffic, which pose hazards. The reports mention

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open trenches and drilled holes posing risk to people and wildlife – this must be managed by securing such sites. We also highlight the importance of road safety on public or communal tracks: project vehicles should observe low speed limits to avoid accidents and dust. Community members especially children or herders should be made aware when heavy equipment will be operating nearby. Additionally, if any historical or cultural artifacts are found (chance finds), the teams should follow a heritage management protocol (we assume a Chance Finds Procedure is appended to the EMP, given standard practice).

In summary, exploration-specific impacts are indeed generally short-term and localized, but they require a robust set of mitigation and rehabilitation measures to ensure no lasting damage. We appreciate that the draft EMPs do list many such measures. We recommend strengthening commitments such as specifying *timeframes* for rehabilitation, quantifying *water to be used for dust suppression*, designating a responsible environmental control officer to monitor compliance.

3. Baseline Data Adequacy for Environment and Social Context

Baseline environmental and socio-economic data underpin the assessment of impacts. Given the remoteness and ecological sensitivity of the Kunene conservancy areas, having a solid baseline is crucial. We have some concerns regarding baseline data adequacy in the draft ESAs:

- Water Baseline: There should be clear information on existing water points (wells, boreholes, springs, rivers) in or near each EPL. For instance, Marienfluss Conservancy has a few community water points and relies on the Kunene River at its northern boundary. The reports should map out these water resources and provide any available data on their yields and quality. If such data is lacking, it may be necessary to collect baseline water quality samples (especially if water might be drawn from a river or borehole for the project). This will also help in monitoring if any contamination occurs. Moreover, a regional sense of water stress is needed:

multiple projects could collectively strain the same water source (see Section 5 on cumulative impacts). Baseline info should thus note, for example, the capacity of Okangwati settlement's water supply if that's a source, or the typical flow of Kunene in dry season if river abstraction is considered.

- **Biodiversity Baseline:** The Kunene Region is home to some endemic and rare species adapted to its harsh climate. We recommend that the ESA reports enumerate any known sensitive species in the project areas (e.g., endemic plants, key wildlife like black rhino, elephant, lions which occasionally roam these conservancies). If formal field surveys were not conducted, the consultants should at least compile existing records from the conservancies or literature (e.g., game counts in conservancy annual reports, if available). For flora, note any occurrence of protected plant species (like Welwitschia or certain succulents) that should be avoided. This baseline is important not only to mitigate exploration impacts but also to flag what would need detailed study if mining is proposed. Currently, baseline descriptions appear generalized; we suggest making them more site-specific, perhaps by focusing on particular localities within EPLs where exploration is likely to concentrate.
- **Socio-Economic and Land Use:** The affected communities are largely indigenous Himba and Herero pastoralists living in communal lands. Livestock husbandry is a primary livelihood in Kunene, complemented by conservancy-based tourism and wildlife use. The baseline should capture current land uses: grazing areas, seasonal movement patterns, and any tourism camps or cultural sites. For example, Marienfluss has community campsites and tourist traffic; these should be identified so that exploration can avoid disrupting tourism during peak seasons. Traditional authorities and conservancy committees are key stakeholders – the baseline should list them and describe their governance structure. We note that communal conservancies have zonation plans (e.g., some areas are core wildlife zones, others are multi-use). In fact, the ESA for EPL-10736 references that

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certain zones in Marienfluss are designated “exclusive wildlife” or “livestock priority,” and commits that no exploration will occur within 1.5 km of settlements or in the exclusive wildlife zone. This is an excellent integration of baseline land-use information into project planning, and we encourage all EPL assessments to incorporate the specific conservancy zonation maps. Ensuring that exploration avoids zones that the conservancy has marked as off-limits to disturbance is crucial for respecting community land management plans.

- Cultural Heritage: The Kunene Region has significant cultural heritage, including Himba graves, sacred sites, and historical landmarks. The baseline should mention if any known heritage sites are in the vicinity. We advise that exploration teams have an orientation on cultural sensitivity for example, seeking permission before accessing certain areas, and understanding local customs. A Chance Finds Procedure should be in place (it appears an appendix on archaeology is provided, which we commend). As cultural heritage sites are of significant importance, the National Heritage Act (Act No. 27 of 2004) finds applicability and must be complied with, particularly in relation to the identification, protection, and management of cultural heritage resources.

Overall, while the ESA reports provide a good general overview of the biophysical and social environment, we feel some gaps remain in baseline specificity. We recommend supplementing the baseline with input from local conservancy officers or long-standing community members who can pinpoint sensitive locations such as waterholes, wildlife breeding areas, etc. This will make impact predictions more accurate and the EMP measures more targeted. Additionally, robust baseline data gathered now will greatly facilitate any subsequent EIA should mining be considered.

4. Legal and Regulatory Compliance – Water Resources Management Act and Other Laws

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We pay special attention to legal compliance, as adequate environmental management cannot occur outside the rule of law. In reviewing the draft ESAs, we found most relevant Namibian legislation is cited (Environmental Management Act 2007 and its EIA Regulations, Minerals (Prospecting & Mining) Act 1992, Nature Conservation Ordinance, etc.). However, compliance with the Water Resources Management Act (WRMA) 11 of 2013 requires stronger emphasis and clarity.

Water Resources Management Act 11 of 2013: This Act, which has now been brought into force (as of August 2023), governs the use and protection of Namibia's water resources. It introduces a modern framework ensuring that water use is sustainable and equitable, and that water resources are protected from pollution. Key obligations likely applicable to the exploration projects include:

- **Water Abstraction Permits:** Under the WRMA (Section 44 and 46, among others), a license is required for any water abstraction or use *beyond small domestic needs*. The ESA reports outline water supply options for exploration, such as trucking water from Okangwati (85 km away for some EPLs) or abstracting from the Kunene River. Neither option has been detailed in terms of permitting. We are concerned that the Proponents may not yet have sought the necessary water permits. If the project will abstract significant volumes (e.g., to supply drilling water), it must obtain a water use license from the Department of Water Affairs before commencing. This applies whether water is taken directly from a natural source or via a local authority/communal source (in which case a supply agreement with that community is also needed). We strongly recommend the final ESA report explicitly confirm how water will be sourced and that the Proponent will secure the required abstraction license or agreement. For example, if Kunene River water is to be used, a permit under the Act is mandatory and an environmental assessment of that abstraction may be needed in its own right. If Okangwati's pipeline or borehole is tapped, the volume should be specified and a written agreement with the traditional authority or local water point committee

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should be obtained plus assurance that community water needs take priority. We also note the cumulative dimension: if multiple EPLs plan to haul water from the same source, the combined volume could be large – requiring careful oversight (see Section 5).

- Water Pollution Prevention: The WRMA imposes a duty not to contaminate water resources (Section 68) and prohibits discharges of pollutants without permission. The EMP should reflect these duties by requiring, for instance, hydrocarbon spill kits on site, no servicing of vehicles near watercourses, proper management of drilling fluids, and immediate reporting to authorities if any contamination occurs. Given the pristine nature of water sources like the Kunene River and its importance to local communities and biodiversity, zero tolerance for pollution must be the rule. We encourage adding a specific commitment that no project waste or effluent will be released into the environment without treatment and that any contaminated soil or materials will be removed promptly.
- Borehole Drilling Notifications: If new water boreholes are drilled for the project, the Act requires registration of boreholes and adherence to drilling standards. Even exploration boreholes (for minerals) should be capped or backfilled to prevent them from becoming conduits for groundwater contamination or hazards to people and animals.

In the draft ESA for EPL-10736, we saw a statement that “*The Water Resources Management Act 11 of 2013 is presently without regulations; therefore, the Water Act 54 of 1956 is referenced.*” We wish to update this point: as mentioned, the new Act is now in force with regulations promulgated in 2023. We note that while the Act is now in force with regulations promulgated in 2023, particular attention should be paid to the Schedule under section 133 of the Act. The regulations under this Act are also applicable and must be complied with for all water-related activities. It would be prudent for the project proponents to consult with the Department of Water Affairs early to ensure all requirements are met. LAC strongly advises that evidence of application for relevant

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water permits be included in the final submission or at least that a condition be set in the ECC that no water abstraction can occur until such permits are obtained.

Other Legal Compliance:

- Environmental Management Act (EMA) 2007: The process being followed (scoping-level assessment and EMP for exploration) is in line with EMA and the 2012 EIA Regulations for listed activities (minerals prospecting is a listed activity requiring an ECC). We commend the consultants on conducting the EA and compiling EMPs. Compliance with the EMA also means meaningful public consultation (addressed in Section 6 of our comments) and submission of all required information to the Environmental Commissioner. We trust that the final reports will include all comments received (including this submission) and responses to issues raised, as required by Regulation 23.
- Minerals (Prospecting and Mining) Act 1992: The proponent's activities must also remain within the confines of their prospecting licenses. Section 52 of that Act, for instance, obliges EPL holders to exercise prospecting rights reasonably and to not damage rights of others or cause undue damage to the surface. We highlight this to reinforce that any landholder or community rights like grazing intersecting with the EPL must be respected. Section 54 of the Minerals Act also requires notice to the Mining Commissioner before abandoning an area – which implies that rehabilitation and closure of exploration sites should be reported and approved. Ensuring alignment between the EMP commitments and the Minerals Act duties will avoid future legal complications. Furthermore, with respect to drilling activities during exploration, Section 61 of the Minerals (Prospecting and Mining) Act finds application and must be adhered to.
- Traditional Authorities and Communal Land Regulations: Since the EPLs lie on communal lands, permission from traditional authorities and conservancies is required before activities commence. We are pleased to see the ESA text acknowledging that consent and land use agreements will be obtained from the

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affected Traditional Authorities and conservancy managements. We emphasize that this is not a mere formality but a legal and ethical necessity. The Communal Land Reform Act 2002 vests communal land in the State but administered by Traditional Authorities; any temporary use of land and any potential damage to grazing or other resources should be negotiated. If any land use fees or compensation are to be paid (the stakeholder meeting notes reference payment of land use fees to conservancies as a positive impact, those should be formalized in the agreements. We urge transparency in these agreements and that they be shared with the Environmental Commissioner as part of compliance monitoring.

- **Wildlife and Forestry Laws:** Any off-take of wildlife or plant products is beyond the scope of the project and should be prohibited (no hunting, no harvesting of timber for camp fuel, etc., without permits). The conservancies typically manage wildlife use; project personnel should be briefed that illegal hunting/poaching will not be tolerated – the ESA did identify the risk of illegal hunting by exploration workers in conservation areas. The EMP should include a code of conduct for workers in this regard. If any protected plant species under the Forest Act or Nature Conservation Ordinance might be affected by clearing, permits must be obtained from the Directorate of Forestry. Specific attention should be given to the Forestry Act and the requirement for permits when vegetation clearing is necessary. In exploration activities, where the creation of new access tracts may impact protected plants and trees, we recommend making use of existing tracts wherever possible to minimize environmental damage. Where vegetation removal is unavoidable, consideration should be given to relocating plants to a nursery to ensure minimum damage to the environment. With regard to rehabilitation, the Environmental Management Act of 2007 (Section 3(2)(j)) and the Forest Act 2001 with its Forest Regulations 2015 (Regulations 8(14) and 8(15)) provide specific legal requirements for site rehabilitation. Under these laws, it is legally mandated that rehabilitation measures be implemented to restore areas affected by project activities. Rehabilitation agreements must be entered into with the Directorate of Forestry prior to

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commencing activities that may damage vegetation, and such agreements must specify the tree species to be planted (preferably native species), planting density, implementation timelines, and monitoring mechanisms. Therefore, plants and trees must be replanted as part of the site rehabilitation process to restore the natural vegetation cover in compliance with Namibian law.

In conclusion on legal compliance: The Water Resources Management Act compliance is a standout issue, given water is fundamental to both project and community. We recommend the final EMP include a table of all permits and authorizations required (e.g., land access agreements, water permits, fuel storage permits if any, etc.) with a clear timeframe for obtaining them. By addressing these proactively, the proponent and consultant show due diligence and reduce the risk of legal breaches.

5. Cumulative Impacts and Regional Considerations

One of our major concerns is the lack of sufficient assessment of cumulative impacts across these multiple EPLs, which are all in the same broader area of Kunene and, in some cases, overlapping the very same conservancies. While each ESA report understandably focuses on its specific EPL, there is an important bigger picture: these five projects will not occur in isolation.

- Overlapping Conservancies and Multiple EPLs: Notably, Marienfluss and Orupembe Conservancies are each facing several concurrent exploration projects:
 - ✓ Marienfluss Conservancy is overlapped by EPL 10736, 10740, and 10742
 - three exploration projects in the same community area. This creates “extraordinary cumulative pressure” on the conservancy’s environment and its people. The combined impacts could include: increased traffic and disturbance from multiple teams, compounded habitat disruption affecting wildlife that roam the whole conservancy, and consultation fatigue as the same community is asked to engage repeatedly on similar projects. Tourism in Marienfluss, one of Namibia’s most iconic wilderness destinations could

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be more severely affected if explorers for different EPLs operate at the same time in different parts of the valley. The scoping reports did not explicitly evaluate what three simultaneous projects mean for Marienflus.

- ✓ Orupembe Conservancy is in an even more precarious position, being partially overlapped by four EPLs: 10736, 10737, 10740, and 10742. In essence, almost the entire conservancy is covered by one EPL or another. The cumulative consultation and management burden on Orupembe are immense, and the environmental impacts (noise, dust, poaching risk, water use) could multiply if all projects proceed. Yet each ESA treated Orupembe's portion in isolation. We strongly feel a joint impact assessment or at least a coordinated strategy is needed for Orupembe. The worst-case scenario of four exploration teams operating independently could lead to chaotic overlaps, conflicting schedules with the community, and uncoordinated environmental mitigation that leaves certain impacts unchecked.
- ✓ Other conservancies also come into play: Sanitatas and Okondjombo (affected by EPL-10737), Otjitanda (affected by EPL-10740), Otjikongo and Otjiu-West (apparently affected by EPL-10738 per our understanding of that area). Each of these may not have multiple projects within them, but they are adjacent and part of the same socio-ecological landscape. For instance, EPL-10737 and 10738 are adjacent, meaning exploration activity will be concentrated in the Sanitatas/Okondjombo/Otjikongo area simultaneously. Wildlife and people cross EPL boundaries; dust or noise doesn't stop at license borders.
- Need for Regional or Strategic Environmental Assessment Approach: We recommend that the Ministry of Environment, Forestry and Tourism (MEFT) consider the five EPL projects together when evaluating the ECC applications. It may be appropriate to request a cumulative impacts addendum or to conduct a higher-level Strategic Environmental Assessment (SEA) for exploration in the

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Kunene communal conservancies. Short of a formal SEA, the proponents and consultant should at minimum engage in information-sharing and coordination amongst themselves. For example, aligning schedules so that not all drill rigs are running at the same time in neighboring conservancies could greatly reduce the overall disturbance at any given moment. The stakeholder feedback already hints at this – community members requested that the proponent(s) maintain “constant communication” and come back to update them on project progress. This continuous dialogue should include discussions of timing and overlap with other projects.

- Specific cumulative issues to highlight:

- ✓ Water Resource Stress: As discussed, if more than one EPL project intends to draw water from, say, Okangwati settlement's supply or the Kunene River, the combined volume could impact the source. One project might have negligible effect, but five projects together could deplete a local borehole or require so many water truck trips that it disrupts community water access. The ESAs should collectively examine whether there is a scenario in which, for example, Okangwati's sustainable yield is exceeded by multiple exploration users. If so, alternative water sources or phasing of use must be planned. This is precisely the kind of issue a cumulative lens reveals. We advise that MEFT and the Department of Water Affairs review all water use plans for these EPLs in aggregate. A coordinated water supply plan (perhaps designating different sources for different projects, or setting a maximum quota per source) might be warranted.
- ✓ Wildlife and Habitat Connectivity: With multiple EPLs contiguous or overlapping, nearly the entire corridor between Marienfluss and Orupembe (and surrounding) may be subject to exploration activity. Disturbance in one area can push animals into another, which may then also have an ongoing project – effectively leaving wildlife with few undisturbed refuges. One

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analysis noted EPL-10740's location between other EPLs could act as a wildlife movement barrier if all areas are active simultaneously. Cumulative impact management could entail ensuring there are "quiet zones" at any given time – perhaps by scheduling so that not all EPLs conduct invasive activities at once, allowing wildlife some respite in between. Additionally, all projects could collaborate on a joint wildlife monitoring program, sharing data on sightings or incidents, to better understand regional wildlife impacts rather than piecemeal data.

- ✓ Community and Institutional Capacity: Conservancies like Marienfluss and Orupembe have small management teams. They now have to interface with multiple companies and consultants, attend multiple meetings, and review multiple documents. This is already causing consultation fatigue. There is a risk that important issues or commitments fall through the cracks simply because community leaders are overburdened. We recommend a solution: coordinated consultations. Instead of four separate meetings for four EPLs in Orupembe, perhaps a joint meeting could be held (with all project proponents present) to discuss overall impacts. While each project must be considered on its own merit, this would lessen the time demand on the community and allow a holistic discussion. Likewise, MEFT could consider holding a joint review session for all these EPL EIAs with the proponents together, to press for a unified approach to mitigation in the conservancies. We note the suggestion in our analysis that the Ministry ensure a coordinated consultation approach for all projects affecting Orupembe, potentially with joint meetings, and that Orupembe Conservancy might need extra support (technical or financial) to engage effectively with so many concurrent proposals. We strongly second those recommendations.
- ✓ Landscape Fragmentation: Each exploration project may create some tracks, campsites, cleared areas. Cumulatively, this could start fragmenting

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the landscape (especially if not all sites are perfectly rehabilitated or if new access routes are pioneered in previously roadless areas). The scenic wilderness character of these conservancies is an asset for tourism and cultural value – multiple exploration footprints can detract from this. Therefore, a cumulative mitigation approach could be to share infrastructure where possible. For instance, if EPL-10737 and 10738 are adjacent, perhaps they can utilize one base camp or share certain access roads, rather than duplicating footprints. This requires coordination among proponents but would significantly minimize the overall disturbed area. Similarly, reclaiming any redundant tracks immediately is important so that they do not inadvertently become new “roads” encouraging bush traversal.

In summary, we stress that each individual ESA report currently does not fully account for the presence of the others. The final documentation submitted to authorities should acknowledge these overlaps candidly and propose ways to handle them. We appreciate that our comments here are addressing a broad scope – the consultant may need to facilitate dialogue beyond a single client. Yet from a regional planning perspective, it is in everyone’s interest (companies, communities, government) that these exploration activities be managed in a coordinated, landscape-level manner. We recommend adding a section in each EMP on *“Cumulative Impact Management and Inter-Project Coordination”*, which could state that the proponent will collaborate with any other active EPL projects in the area on schedules, shared mitigation where feasible, and combined monitoring efforts. This would be an innovative and proactive step, setting a positive precedent for responsible exploration in communal areas.

6. Community Engagement and Consultation Process

Engagement with the affected communities and stakeholders is not only a legal requirement under Namibia’s EIA regulations, but a moral imperative given the projects occur on communal lands where people’s livelihoods and cultural heritage are directly

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intertwined with the environment. We wish to provide feedback on the consultation process as reflected in the draft reports, and suggest improvements going forward:

- Consultation Conducted: We note from the ESAs that a combined public meeting was held on 21 June 2025 at Marienfluss Community Campsite, involving community members and stakeholders from Marienfluss and Orupembe (and possibly other areas). It is reported that 25 people attended, including the consultant team and one representative of each proponent. We are concerned that this attendance number is quite low relative to the broad geographic spread and multiple communities involved. While remote locations and difficult logistics no doubt made it challenging, 25 people (minus project staff) likely means only a handful of community representatives were present. This raises questions: Were all conservancies and Traditional Authorities from each EPL area adequately notified and able to attend? Was the meeting location accessible for others (e.g., Sanitatas or Okondjombo communities for EPL-10737, who are far from Marienfluss)? There is a risk that some affected parties (especially for EPL-10737, 10738 which are more to the south) did not participate meaningfully in this meeting.
- Coverage of Issues: The meeting minutes in the ESA indicate that those present did voice some important expectations: *prioritization of local employment, transparency and updates from the proponent, a follow-up meeting after ECC issuance, and returning to agree on way-forward once licenses are issued*. The community clearly seeks ongoing involvement and information access throughout the project cycle – not just one-off consultations. We urge that the final EMP explicitly include these commitments: for example, commit to hold a feedback meeting with the community once the ECC is granted (and share key conditions of the ECC and plans), and commit that before any exploration commences on the ground, the proponent will meet again with the local Traditional Authority and conservancy to outline the work program and timing. Essentially, consultation should be an ongoing process, not a single event.

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- Consultation Outreach: We recommend that additional efforts be made to reach all affected communities. If combined meetings are logistically necessary, consider rotating venues or having multiple sessions. For instance, one meeting could be held in Orupembe (for Orupembe and adjacent communities), another in Opuwo or Okangwati (for easier access by more distant stakeholders like government, regional council, or communities further south). Translation is key – presentations and documents should be explained in the local languages (most likely Otjiherero for Himba/Herero communities). We did not see mention of whether interpreters were used; we assume they were, but it should be ensured. Also, given literacy levels in rural areas, distributing *executive summaries or BID documents in plain language* (possibly with some visual aids) can help inform those who can't review a full report.
- Information Access: We are concerned about the ability of community members to review the Draft ESA reports and EMPs themselves. These are technical documents and might not have been easily available in the conservancies (likely only accessible in Windhoek or Opuwo via the MEFT portal). It's imperative that after this comment period, when revised final reports are ready, the consultant should provide copies to the conservancy offices or Traditional Authorities. Transparency will build trust – for instance, sharing the EMP with conservancy game guards and committees so they know what commitments the company has made, allows them to help monitor compliance on the ground. The Legal Assistance Centre is ready to assist in facilitating understanding of the documents if needed.
- Grievance Mechanism: The EMP should outline how the community can raise concerns or complaints during the project. Who can they contact if, say, they observe environmental damage or have a conflict with exploration personnel? A grievance redress mechanism (even an informal one, like a designated community liaison or a logbook at the conservancy office) would improve responsiveness. This could tie into the suggestion that each EPL proponent have a Community Liaison

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Officer, possibly hired locally, to maintain dialogue with communities throughout the exploration period.

- Benefit Sharing and Local Opportunities: While exploration is short-term and low-intensity, it should still aim to benefit locals where possible. We note that one positive impact identified is temporary employment for locals and payment of land use fees to conservancies and traditional authorities. We support these measures and would like to see them guaranteed. The number of jobs in exploration is small, but even a few watchmen, guides, or laborers should, as a priority, be hired from the nearest communities. Likewise, any community development projects or contributions (sometimes companies give donations to conservancies or assist with water infrastructure as goodwill) should be discussed with the community so they align with local needs. Ensuring benefits, though modest at exploration stage, helps offset the community's tolerance for the disturbance and sets a tone of partnership.
- Addressing Fears and Expectations: In our experience, communities often have anxieties about exploration leading to land loss or unchecked mining. It should be clearly communicated that exploration does not mean automatic mining, and that any mining would require a fresh agreement and assessment. Managing expectations is crucial – both to avoid false hope (some may think a mine will bring riches) and to alleviate unfounded fears. The consultation should also carefully distinguish between what is being proposed now (minor drilling and sampling) versus the concept of a large mine. We recommend the proponent and consultant continue to emphasize this distinction in all community engagements. On the flip side, any legitimate long-term concerns communities have (like “will we be relocated if a mine comes?”) should be noted now and addressed at the proper time with transparency.

In conclusion, we find that consultation to date, while initiated, needs to be deepened and broadened. Particularly, as noted earlier, coordinated consultation for multiple EPLs affecting the same communities should be implemented to reduce fatigue. We also urge

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improved record-keeping: attendance registers, minutes, and issues raised should all accompany the final submission to MEFT (this demonstrates compliance with consultation requirements). Perhaps a Consultation Report as an appendix would be useful, compiling all notices, meetings, and feedback.

Ultimately, the success of these exploration projects will, to a large extent, hinge on community relationships. The conservancies are essential partners – they can either be invaluable guides and supporters, or, if alienated, they can become sources of conflict. By heeding the requests for transparency, ongoing dialogue, and respect for community input, the proponents will lay a positive groundwork not only for this exploration but for any future developments.

7. EPL-Specific Observations

While the majority of our comments apply across all five projects, we note some specific observations for each EPL to inform any tailored mitigations or focus areas. We also highlight the regional cross-cutting themes of water, biodiversity, and traditional land use as they pertain to each license area:

- **EPL 10736 (Naxos Investments)** – Northwest of Opuwo, 87,934 ha, overlapping Marienfluss (majority) and Orupembe (partial) Conservancies. This EPL lies in one of the most environmentally sensitive and remote parts of Namibia (Marienfluss Valley). Key considerations:
 - ✓ Marienfluss Conservancy: The project must coordinate closely with the conservancy committee, especially because Marienfluss is already burdened by two other EPLs. As noted, cumulative impacts on Marienfluss are a top concern, including potential disturbance to community-based tourism (e.g., tourist 4x4 routes and campsites are in the valley). The EMP should ensure that exploration does not occur near tourist camps or during high tourist season without conservancy agreement.

- ✓ Cultural sites: Marienfluss is home to Himba communities with sacred sites; extra care in identifying and avoiding these is needed.
- ✓ Water: The Kunene River forms the northern boundary – if there is any plan to abstract water from it, transboundary implications (Angola-Namibia) might arise, and strict anti-pollution measures along the riverbanks are needed. However, trucking from Okangwati (85 km away) is one option mentioned. If so, consider the strain on Okangwati's water – multiple trucks over 85 km of rough road also have safety and maintenance implications.
- ✓ Wildlife: Desert elephants and other game do use Marienfluss; exploration teams should be briefed on how to behave if encountering elephants (keep distance, no harassment) and possibly enlist local wildlife rangers to guide site selection away from frequented water points.
- ✓ Rehabilitation: Given the pristine nature of the area (currently with minimal track scars), rehabilitation success will be a litmus test – a bond or guarantee for rehab could be considered by authorities to ensure it is done.
- **EPL 10737 (Ashford Investments)** – Southwest of Opuwo, 85,698 hectares ha, overlapping Sanitatas (primary), Okondjombo (partial), and Orupembe (partial) Conservancies. This EPL covers a broad area involving three conservancies, each with potentially different priorities. Key considerations:
 - ✓ Multi-Conservancy Coordination: As our earlier comment highlighted, the ESA report did not sufficiently address how to manage engagement across Sanitatas vs. Okondjombo vs. Orupembe. We recommend separate introductory meetings with each, rather than assuming one size fits all. For example, Sanitatas might be more focused on its tourism potential (if any)

or grazing, whereas Okondjombo is less known and possibly less developed.

- ✓ Orupembe cumulative: Orupembe's portion here adds to the four-EPL burden. If EPL-10737 conducts any activity in Orupembe, it should be with knowledge of what 10736 and 10742 are doing in the same conservancy. Perhaps they can share a single access route to Orupembe area to minimize multiple tracks.
- ✓ Water: This EPL might have the option of Kaoko-Otavi or Opuwo as nearer water sources (if southwestern of Opuwo, maybe it is closer to Opuwo than Okangwati). If water could be sourced from Opuwo or Kaoko-Otavi (90 km away per analysis), that might lessen burden on Okangwati and Kunene. In any event, clarify water plans and permits.
- ✓ Socio-economic: Parts of this EPL may be nearer to main roads (the Opuwo-Purros road) and thus potentially see more traffic interference – though we are not certain of exact location. Ensure any settlements along approach routes (like villages near Opuwo) are consulted if they'll see project traffic.
- ✓ Distinct mitigation: The EMP should consider if any particular issue (like a known lion range or elephant corridor) exists in Sanitatas/Okondjombo; these conservancies are less publicized but could harbor important wildlife or community areas.
- **EPL 10738 (Bodmin Investments)** – Southwest of Opuwo (adjacent to EPL-10737), **14,728 ha** (significantly smaller), overlapping what appears to be Otjikongo and Otjiu-West conservancy areas. This is the smallest EPL of the five, which can be viewed as a pilot or simpler case. Key considerations:

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- ✓ Scale and Footprint: Its smaller size means fewer sites will be disturbed. This should make it easier to manage and fully rehabilitate each impact. We expect the proponent can achieve a high standard of environmental care here, setting an example.
- ✓ Not overlapping others directly: According to analysis, 10738 doesn't directly overlap the other EPLs, though it is adjacent to 10737. So direct cumulative overlap issues are less, but regional cumulative issues (water, etc.) still apply.
- ✓ Water: This area might be closest to Kaoko-Otavi (approx. 50 km), a possible water source, which is logistically easier than Okangwati for the northern EPLs. If Kaoko-Otavi is used, ensure a formal agreement and permit. Even for a small project, WRMA compliance is required – no shortcuts because of size.
- ✓ Focused engagement: The conservancies here (Otjikongo, Otjiu-West) are not inundated by multiple projects, so the proponent can really focus on them. The analysis suggests using this as an opportunity to establish a strong consultation model, with multiple meetings and active conservancy involvement in monitoring. We agree: perhaps even form a small liaison committee with community representatives to oversee exploration progress.
- ✓ Wildlife/Biodiversity: This EPL might border the Skeleton Coast Park or be near extremely arid zones. It will be important to confirm if any part of it encroaches on protected areas or key wildlife habitat. If so, collaboration with MET (Wildlife) is needed for guidance. Otherwise, standard precautions as listed before (no poaching, minimal disturbance) apply.

- **EPL 10740 (Congleton)** – Northwest of Opuwo, 48,836 ha, overlapping Marienfluss and Otjitanda Conservancies. Key considerations:
 - ✓ Marienfluss cumulative: EPL-10740 is one of the three hitting Marienfluss. It presumably covers the southern part of Marienfluss plus adjoining areas. The cumulative load on Marienfluss from 10736, 10740, 10742 has been

elaborated – for 10740 specifically, it might lie between 10736 and 10742 geographically, essentially contributing to a wildlife barrier effect if all become active. Coordination with the other two EPLs in Marienfluss is essential – for instance, perhaps they can agree not to all drill in Marienfluss at the same time.

- ✓ Otjitanda Conservancy: This conservancy is less known; it might be a smaller community or area adjacent to Marienfluss. If 10740 overlaps Otjitanda, the ESA should address specific issues there. The analysis hints that Otjitanda had minimal separate consultation and differs from Marienfluss in priorities. So, we advise giving Otjitanda its own voice – meet their leadership separately to identify any site-specific concerns for example perhaps a particular water spring or grazing area they value.
- ✓ Wildlife Corridor: If 10740 lies in a corridor connecting Marienfluss to Orupembe or further south, then it might be traversed by animals moving seasonally. Ensuring that exploration activities leave some routes undisturbed at any one time would mitigate this.
- ✓ Sizeable exploration: At 48,836 ha, this is a significant area – the proponent should prioritize where to explore such that disturbance is limited to high-prospectivity zones rather than scattering impact widely. The scoping out of targets (with non-invasive methods) should be used to concentrate any invasive activities efficiently.
- (5) Community benefits: If multiple EPLs are in Marienfluss, perhaps they can pool resources to benefit the community – for example, jointly repairing a borehole or investing in a community project. This might be outside the strict EA scope, but it's a thought to help offset the combined inconvenience to locals.

- **EPL 10742 (Hildeshein Investments)** – *Northwest of Opuwo, 73,402 ha, overlapping Marienfluss and Orupembe Conservancies.* This EPL is notable as it covers two highly impacted conservancies and is itself large. Key considerations:
 - ✓ “Cumulative Epicenter”: With Marienfluss (3 EPLs total) and Orupembe (4 EPLs total) as its locales, EPL-10742 essentially epitomizes the cumulative

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issue. The analysis from LAC indicated this is the clearest case where *“individual project assessment is grossly inadequate”* and a coordinated regional approach is needed. We urge the consultant and proponent to acknowledge this directly. For instance, the ESA could state: *“EPL-10742’s impacts cannot be viewed in isolation given the presence of EPLs 10736, 10737, 10740 in the same conservancies. A joint mitigation and monitoring effort is recommended.”* Such an admission would strengthen the credibility of the assessment.

- ✓ Orupembe Focus: Orupembe conservancy’s well-being might very well hinge on how 10742 (and others) operate. Perhaps one way forward is to establish a formal forum or committee in Orupembe comprising representatives from all EPL proponents and the conservancy, to meet periodically and address concerns. LAC’s analysis suggested that support (technical, financial) be given to Orupembe to handle the four-project burden. We echo that – maybe the companies can collectively fund a community liaison officer or an independent environmental monitor for Orupembe.
- ✓ Access and Logistics: 10742, being large, likely spans from near Marienfluss down through Orupembe. Access could be very challenging (this is some of Namibia’s most remote terrain). Helicopter-supported geophysics was mentioned for some areas; care should be taken even with that (noise from low-flying aircraft can panic wildlife). Overland access might require new tracks – avoid creating duplicate paths: use existing ones as far as possible.
- ✓ Water: Possibly a combination of sources – Okangwati is 30 km from part of this EPL as per analysis, which is closer than for 10736. If 10742 and 10736 both use Okangwati’s water, that cumulative draw must be gauged. Maybe one of them could instead bring from elsewhere to split the load.
- ✓ Enhanced Monitoring: Given the sensitivity, 10742 should have an especially rigorous monitoring plan. This could include monthly inspections

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by an environmental officer during active work, wildlife observations recorded, community feedback logged, etc. The remoteness also means MET and other authorities might seldom visit – so the proponent carries extra responsibility to self-audit and report truthfully. Perhaps include a commitment to submit periodic compliance reports to the authorities and conservancies.

Cross-cutting regional themes: Across all EPLs, the themes of water, biodiversity, and traditional land use recur:

- ✓ *Water*: We have discussed at length – it's the lifeblood in this arid region. All projects must ensure no drying of community water points and no pollution. Water is also a point of potential community tension (if, say, villagers feel the project “steals” their water). Transparent communication and proper licensing will mitigate this.
- ✓ *Biodiversity*: The Kunene's wildlife is world-renowned (desert elephants, free-roaming lions, black rhinos among others). Communal conservancies have been a successful model for wildlife conservation. It would be tragic if a series of short-term exploration projects undid years of conservation progress by causing wildlife to flee or increasing poaching (however unintentionally). Therefore, strict anti-poaching rules for workers, coordination with local game guards (maybe even hiring some as scouts or guides), and minimizing habitat damage are all essential to keep biodiversity impacts low.
- ✓ *Traditional Land Use*: The Himba and other residents have a semi-nomadic pastoral system. Grazing areas, water points, and transitory settlements dot the landscape in patterns that outsiders may not immediately see. We implore each project team to consult elders about where livestock are grazed seasonally, so they do not set up a camp on a crucial grazing reserve or block an important livestock route. Also, respect for sacred sites (e.g., holy fire places, graveyards) is non-negotiable. Traditional authority

consent (which is legally required) should be coupled with *traditional courtesy* – seeking blessings, engaging local chiefs properly. This not only avoids conflict but is also respectful of Namibia's heritage.

Finally, we stress that each EPL proponent should not work in a vacuum. The proponent companies, some of which share addresses or are related (we noticed several have the same Swakopmund P.O. Box, suggesting possible affiliation), should actively collaborate. If indeed they are sister companies or partners, they have even more reason to treat these EPLs as a collective project with a unified environmental management strategy. Even if separate, they should be encouraged to collaborate for the sake of the environment and communities.

8. Transition from Exploration to Mining – Future Framework

Although these comments focus on the current exploration phase, we must address the eventual possibility that one or more of these EPLs yields a viable mineral discovery. It is crucial that a clear framework is established now for how the transition to any future mining proposal would occur. This framework is important for managing community expectations and ensuring that baseline work during exploration sets the stage for the more intense EIA that mining would require.

- Use of Exploration Data in Future EIA: We encourage the proponents to collect robust data now that will feed into a potential mining EIA. For example, if groundwater is encountered during exploration drilling, record its depth and yield – such data is valuable for hydrogeological modeling in a mining scenario. Baseline environmental data gathered (wildlife sightings, water quality tests, soil analyses) should be stored and analyzed so that trends can be observed if mining comes 2-3 years down the line. Essentially, treat this exploration phase as laying the environmental groundwork: it's easier to do incremental studies now than to scramble later. The community should also be kept informed: if a resource is found and the company plans to proceed to a mining license application, they should

begin dialogue early about what that might entail. This does not mean doing the mining EIA now, but it means ethically preparing the community that a more significant decision will come and that *their input will again be central at that stage*.

- Framework Agreements: In some cases, exploration companies enter into Memorandums of Understanding (MoUs) with conservancies or communities during exploration to outline what happens if a mine is developed (e.g., promises of jobs, community projects, etc.). If any such discussions occur, they should be transparent and inclusive. Perhaps more pertinent is to have a framework for land access: e.g., an agreement that if the project transitions to mining, new land-use agreements will be negotiated in good faith with the community. This assures locals that they won't be bypassed in that eventual process.
- Regulatory Sequence: It might be useful for the ESA reports to briefly outline the steps from exploration to mining license, so that everyone (including lay readers) understands. For instance: exploration success -> application for mining license to MME -> detailed feasibility study -> full EIA and public consultation -> ECC for mining -> then mining can commence. The reports do mention this process in narrative form; we support that inclusion. It sets a "line in the sand" that no mining can slip in without that rigorous evaluation. Additionally, it could highlight that during the mining EIA, *cumulative impacts would again be assessed*, likely in even greater detail (including any other developments in the area then).
- Closure Planning from Outset: A future mine would require a closure plan from day one. We mention this here because exploration results might influence where a mine might be located. The community will want to know, for example, if a mine is built, what will happen to their land and how it will be left afterwards. While this is too early to detail, the exploration team should keep good records of environmental conditions such that if a mine proposal comes, the reclamation to pre-project conditions is measurable and achievable. Also, if exploration identifies any

particular sensitivities (maybe a rare species or an important cultural site), that might dictate *not proceeding* with mining in that spot – better to find out now.

- Interim Period Management: If exploration finishes and there's a gap before any mining, what happens? The EMP should ensure that all sites are rehabilitated and safe during the idle period. Sometimes companies leave boreholes open “for future use” – this should only be done if properly capped and with Ministry of Water’s permission. Otherwise, close everything out. Should the project not advance to mining, the community should not be left with a mess or hazards. Conversely, if they *do* advance, everything done now should align with eventual mine planning (for example, any access road built now could be planned along a route that could serve a mine later to avoid multiple roads). Thinking ahead can reduce redundant impacts.

In essence, exploration is the first chapter of a story that might lead to mining. We want to ensure that this chapter sets a positive tone of environmental stewardship and community respect, so that if a mine is proposed, it can build on that goodwill and data. Part of that is being open now about the future process, and part is doing everything in exploration to high standards so that there are “no regrets” later (no lost data, no preventable damage done).

9. Conclusion

In conclusion, the Legal Assistance Centre believes that these Draft Environmental Scoping Reports and EMPs for EPLs 10736, 10737, 10738, 10740, and 10742 provide a necessary starting point for understanding the proposed exploration activities and their impacts. However, as detailed in our comments, we see opportunities and needs to strengthen the assessments and plans in the following key ways:

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- Explicit commitment to legal compliance, especially with water use licensing under the Water Resources Management Act 2013, and clear documentation of how water will be obtained without harming community supply or the environment.
- Augmenting baseline data and analysis for environmental and social aspects, so that the unique characteristics of each area (and each conservancy) are fully accounted for in impact predictions and mitigation measures.
- Enhancing mitigation and monitoring measures for exploration impacts, ensuring issues like site rehabilitation, wildlife protection, and avoidance of community disturbances are addressed with specific, enforceable actions in the EMPs.
- Addressing cumulative impacts head-on by coordinating among all five EPL projects. This is perhaps the most critical gap – without a concerted approach, even well-managed individual projects could together exceed environmental or social thresholds. We urge a collaborative regional management strategy.
- Deepening community engagement, moving from a one-meeting consultation check-box towards an ongoing partnership with conservancies and Traditional Authorities. This includes better information dissemination, responding to community requests for feedback loops, and respecting their land management systems.
- Clarifying the path forward, so that all parties understand how exploration results will be handled, and that any progression to mining will be subject to full scrutiny and community input at that time. Managing expectations now will prevent mistrust later.

We trust that these comments will be constructively received. We are aware that incorporating them may require additional effort – perhaps supplementary consultations, revised sections in the reports, or even coordination meetings among the various EPL proponents. Nonetheless, we firmly believe that doing so will greatly improve the overall quality and credibility of the environmental assessment process for these projects. In turn, this will benefit not only the environment and communities of Kunene, but also the

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proponents, by fostering a smoother path for project implementation with stakeholder buy-in and legal surety.

The Legal Assistance Centre remains available to discuss any of these comments or assist in facilitating further dialogue. We are invested in ensuring that Namibia's natural heritage and community rights are safeguarded, even as responsible development is pursued.

Thank you for the opportunity to contribute to this review process. We look forward to seeing the final Scoping Reports and EMPs, and ultimately, to seeing these exploration activities – if approved – carried out in an environmentally and socially responsible manner.

Yours faithfully,


pp

Corinna Van Wyk

Project Coordinator,
Land, Environment and Development (LEAD) Project
Legal Assistance Centre
Windhoek

Cc.:

The Environmental Commissioner

Mr. Timoteus Mufeti

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Appendix G2: Comments & Response Trail (Document)

APPENDIX G2 (A): Issues/comments pasted as received from one of the I&APs during the EIA Study (during the review of the draft documents)

Re: Draft Environmental Impact Assessment (EIA) Scoping Reports, EMPs and Minutes for Review and Comments: EPL-10736, 10737, 1078, 10740 & 10742 in the Kunene Region



Basilia Shivute [\[REDACTED\]@a>](#)
To: Serja EIA Consultations & Public Engagements

Cc: stefanus@serjaconsultants.com; 'Fredrika Shagama - Serja HGE Consultants'; Rudolph Tjaveondja; UO Kapi; Exploria Gawusas

 You replied to this message on 20/10/2025 11:36 am.

 Reply  Reply All  Forward 

Fri 03/10/2025 1:00 pm

Dear Ms. Shagama,

Thanks for sharing the documents.

Please confirm if there will be an opportunity to present the results to the affected communities, especially since most may not have access to the internet and are unable to sift through large documents.

Regards,
Basilia

Basilia Shivute – IRDNC Senior Manager Operations Kunene
No 7 Rossini Street, Windhoek West, Windhoek
PO Box 24050, Windhoek, Namibia

Tel: (+264 61) [\[REDACTED\]](#)
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Mobile: (+264 61) [\[REDACTED\]](#)
E-Mail: basilia@serjaconsultants.com

From: Serja EIA Consultations & Public Engagements <eiias.public@serjaconsultants.com>

Sent: Thursday, October 2, 2025 10:48 AM

To: eiias.public@serjaconsultants.com <eiias.public@serjaconsultants.com>

Cc: stefanus@serjaconsultants.com; stefanus@serjaconsultants.com; 'Fredrika Shagama - Serja HGE Consultants' <fredrika@serjaconsultants.com>

Subject: Draft Environmental Impact Assessment (EIA) Scoping Reports, EMPs and Minutes for Review and Comments: EPL-10736, 10737, 1078, 10740 & 10742 in the Kunene Region

Dear Stakeholder,

This email serves to inform you that the Draft Environmental Scoping Assessment Reports and their respective Environmental Management Plan (EMP) (as primary documents required by the Ministry of Environment, Forestry & Tourism (MEFT)) towards the application for environmental clearance certificates (ECCs) for the proposed prospecting and exploration activities on EPL-10736, 10737, 1078, 10740 and 10742 have been compiled and ready/available for your review and comments.

Given the file sizes of the documents (that may be too large for some mail inboxes), please follow the Google link here <https://drive.google.com/drive/folders/1DVfYRVZVdcuygFpIIaIFZh-XArzFal?usp=sharing> to access and download the documents.

It is important to note that these environmental assessments/EIA studies **are for exploration only** and not mining activities because mining cannot be carried out on EPLs. A mining license or licenses would need to be applied for from the Ministry of Industries, Mines & Energy (MIME) at a later stage, if exploration on some or all EPLs yields economically feasible results to advance to the mining stage, of which different EIA studies and respective consultations/engagements would be undertaken at an advanced

NOTE FROM SERJA CONSULTANTS

Please note that the I&AP's email address and number have been partially blacked out because this document will be uploaded on the ECC Portal (as required) and published by the Ministry of Environment for further public review for 14 days. From experience, some people on the internet copy email addresses from the ECC Portal during that period and spam people's emails. Thus, SERJA is trying to protect the I&AP details from such.

| No. | Commentor / Name of I&AP, Date & Mode of Communication | The list of comments/issues as received | Response by Serja HGE Consultants |
|-----|--|---|---|
| 1. | Ms. Basilia Shivute on the 03 rd of October 2025, via email | Dear Ms. Shagama, Thanks for sharing the documents. Please confirm if there will be an opportunity to present the results to the affected communities, especially since most may not have access to the internet and are unable to sift through large documents. Regards, Basilia | Dear Ms. Shivute, Regarding the opportunity to present results to the affected communities, it is unfortunate that at the moment to hold feedback meetings for the projects due to time constraints. However, what we usually do and have done for some of the projects, we recommend additional/feedback and preparatory community meetings, after and if the Environmental Clearance Certificate (ECC) is issued for a project. This is to allow project proponents and communities to come together again and forge a way forward based on the ECC and or ECC and EPL certificates with MEFT-approved Environmental Management plans (EMPs) while planning for the commencement of activities and agree on conditions of operations together. We are just adding that as a MUST instruction in the final EMPs, too, for these meetings. Furthermore, a recommendation has been made by the Legal Assistance Centre (LAC) on the 24th of October 2025 that ‘‘the review of multiple documents is already causing consultation fatigue. There is a risk that important issues or commitments fall through the cracks simply because community leaders are overburdened. We recommend a solution: coordinated consultations.’’ |
| 2. | | | |
| 3. | | | |
| 4. | | | |

APPENDIX G2 (B): Issues/Comments and Response Trail to comments received (EIA Studies for the Prospecting and exploration activities on EPL-10736, 10737, 10738, 10740 & 10740 in the Kunene Region), six days are the 14 days of draft documents review.

The significant issues and concerns submitted on the 24th of October 2025 (after draft report review) are noted/summarized below, and responses provided thereof. These comments and issues are presented as received under Appendix G1 above.

| No. | Commentor / Name of I&AP, Date & Mode of Communication | The list of summarized comments/issues received | Response by Serja HGE Consultants |
|-----|--|---|--|
| 1. | Legal Assistance Centre (LAC) on the 24 th of October 2025, via email | 2. Exploration Activities – Impacts and Mitigation | |
| 2. | | Soil Disturbance and Erosion | These have been included in the Report under impact assessment, and measures have been added in the EMP under the respective impact management table row. |
| 3. | | Biodiversity and Habitat | These have been included in the Report under impact assessment, and measures have been added in the EMP under the respective impact management table row. |
| 4. | | Water Resources Impact: Water is extremely scarce in Kunene, and any use or potential contamination of water resources is a critical issue. | This has been noted and included in the Report under impact assessment and measures added in the EMP. This also included the recommendation for a baseline hydrogeological assessment for water supply after the reconnaissance surveys (when no to very little water may be used), when it is clearly determined that there is a promising mineral deposit and exploration will need to advance to diamond drilling, which will require a lot of water. |
| 5. | | Air Quality and Noise: Dust generation from driving on dirt tracks and drilling can locally compromise air quality, and noise from drill rigs or vehicles may disturb humans and animals. | This has been included in the Report under impact assessment, and measures have been added in the EMP under the respective impact management table row. |

| No. | Commentor / Name of I&AP, Date & Mode of Communication | The list of summarized comments/issues received | Response by Serja HGE Consultants |
|-----|--|--|--|
| 6. | | Visual and Landscape Impacts: By nature, exploration leaves a smaller footprint than mining, but visual impacts can arise from cleared drill pads, temporary camps, or lingering evidence of trenches. | This has been included in the Report under impact assessment, and measures have been added in the EMP under the respective impact management table row. |
| 7. | | Occupational and Community Health & Safety: Exploration works introduce open pits, drilling rigs, and increased traffic, which pose hazards | This has been included in the Report under impact assessment, and measures have been added in the EMP under the respective impact management table row. |
| | | 3. Baseline Data Adequacy for Environment and Social Context | |
| 8. | | Water Baseline: There should be clear information on existing water points (wells, boreholes, springs, rivers) in or near each EPL | The information has been presented as collected in the field, where a visit was possible, and complemented by the literature of the area. An example is the existence of boreholes in Marienfluss Conservancy, and a photo of these boreholes is provided in the Scoping Report (under infrastructure and services, baseline chapter: Figure 5-14 for EPL-10736, Figure 4-12 for EPL-10740, and Figure 5-12 for EPL-10742). One of the challenges with remote/rural boreholes is that they are mostly sealed off to protect against vandalism. As such, it is usually very difficult or no access to the water level for a dip meter to be lowered down the borehole to take water level readings. Furthermore, the surface and groundwater database was used to map the recorded and available water data in the area. These maps are provided in the baseline chapters (Geohydrology maps for each EPL). However, the borehole information from the recorded borehole information in the national database provides the baseline information of the areas, |

| No. | Commentor / Name of I&AP, Date & Mode of Communication | The list of summarized comments/issues received | Response by Serja HGE Consultants |
|-----|--|--|---|
| | | | where available and recorded at the time of drilling in the past. This information is provided for selected boreholes inside respective EPLs, and or within proximity to EPLs as shown on the maps in Figure 5-12, Figure 5-13, Figure 5-12, Figure 5-11, and Figure 5-11 of the Reports, respectively. |
| 9. | | Biodiversity Baseline: The Kunene Region is home to some endemic and rare species adapted to its harsh climate. We recommend that the ESA reports enumerate any known sensitive species in the project areas (e.g., endemic plants, key wildlife like black rhino, elephant, and lions, which occasionally roam these conservancies). | This is noted and added to the baseline sections. |
| 10. | | Socio-Economic and Land Use: The affected communities are largely indigenous Himba and Herero pastoralists living in communal lands. Livestock husbandry is a primary livelihood in Kunene, complemented by conservancy-based tourism and wildlife use. The baseline should capture current land uses: grazing areas, seasonal movement patterns, and any tourism camps or cultural sites. | The land use baseline has been included in the baseline chapters, and recommendations have been made to avoid such sites (a radius of 1.5km has been recommended around homesteads, tourism camps, and settlements, as well as archaeological-cultural buffers for different sites). |

| No. | Commentor / Name of I&AP, Date & Mode of Communication | The list of summarized comments/issues received | Response by Serja HGE Consultants | |
|-----|--|---|--|--|
| 11. | | Cultural Heritage: The Kunene Region has significant cultural heritage, including Himba graves, sacred sites, and historical landmarks. The baseline should mention if any known heritage sites are in the vicinity. | Archaeological & Heritage Impact Assessment Studies were carried out for the EPL (as part of the requirements for EPL Heritage Consent application), and the baseline information is under the EIA baselines (Section 5.4). The AHIA Reports (as submitted to the National Heritage Council (NHC) for each EPL) can be accessed here https://drive.google.com/drive/folders/1TayhbpBkDsnOofyDF1dDLFVuGFcBWFsP?usp=sharing | |
| | | 4. Legal and Regulatory Compliance – Water Resources Management Act and Other Laws | | |
| 13. | | Water Abstraction Permits: Under the WRMA (Section 44 and 46, among others), a license is required for any water abstraction or use beyond small domestic needs. The ESA reports outline water supply options for exploration, such as trucking water from Okangwati (85 km away for some EPLs) or abstracting from the Kunene River. Neither option has been detailed in terms of permitting. We are concerned that the Proponents may not yet have sought the necessary water permits. The project will abstract significant volumes (e.g., to supply drilling water), and it must obtain a water use | The water supply aspect has been revised and incorporated into the Scoping Reports (section 2.4.4) and mitigation measures provided in the EMPs (under water resources: Over-abstraction (water demand and availability)). | |

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| | | license from the Department of Water Affairs before commencing. | |
| 14. | | Water Pollution Prevention: The WRMA imposes a duty not to contaminate water resources (Section 68) and prohibits discharges of pollutants without permission. The EMP should reflect these duties by requiring, for instance, hydrocarbon spill kits on site, no servicing of vehicles near watercourses, proper management of drilling fluids, and immediate reporting to authorities if any contamination occurs. | This has been noted and incorporated into the EMPs. |
| 15. | | Borehole Drilling Notifications: If new water boreholes are drilled for the project, the Act requires registration of boreholes and adherence to drilling standards. Even exploration boreholes (for minerals) should be capped or backfilled to prevent them from becoming conduits for groundwater contamination or hazards to people and animals. | This has been noted and incorporated into the EMPs. |

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| 16. | | <p>Environmental Management Act (EMA) 2007: The process being followed (scoping-level assessment and EMP for exploration) is in line with EMA and the 2012 EIA Regulations for listed activities (minerals prospecting is a listed activity requiring an ECC). We commend the consultants on conducting the EA and compiling EMPs. Compliance with the EMA also means meaningful public consultation (addressed in Section 6 of our comments) and submission of all required information to the Environmental Commissioner. We trust that the final reports will include all comments received (including this submission) and responses to issues raised, as required by Regulation 23.</p> | <p>This has been well noted and incorporated into the Reports and EMP, as well as emphasis in the Report conclusions on transparency, continued engagements, and feedback meetings, particularly upon issuance of the ECCs and EPL certificates (to discuss conditions of certificates) before commencement of any activities at the EPLs.</p> |
| 17 | | <p>Minerals (Prospecting and Mining) Act 1992: The proponent's activities must also remain within the confines of their prospecting licenses. Section 52 of that Act, for instance, obliges EPL holders to exercise prospecting rights reasonably and not to damage the</p> | <p>This is noted and incorporated into the EMPs under impact mitigation measures and rehabilitation measures.</p> |

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| | | <p>rights of others or cause undue damage to the surface. We highlight this to reinforce that any landholder or community rights, like grazing, intersecting with the EPL must be respected. Section 54 of the Minerals Act also requires notice to the Mining Commissioner before abandoning an area, which implies that rehabilitation and closure of exploration sites should be reported and approved. Ensuring alignment between the EMP commitments and the Minerals Act duties will avoid future legal complications. Furthermore, with respect to drilling activities during exploration, Section 61 of the Minerals (Prospecting and Mining) Act finds application and must be adhered to.</p> | |
| 18. | | <p>Traditional Authorities and Communal Land Regulations: Since the EPLs lie on communal lands, permission from traditional authorities and conservancies is required before activities commence. We are pleased to see the ESA text acknowledging that consent and</p> | <p>This is noted and done (consents have been issued). Conditions of land use and subsequent payments thereto will be discussed and implemented between the Traditional Authorities, whereby Memoranda of Agreements will be put in place.</p> |

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| 19. | | land use agreements will be obtained from the affected Traditional Authorities and conservancy managements. We emphasize that this is not a mere formality but a legal and ethical necessity. The Communal Land Reform Act 2002 vests communal land in the State but is administered by Traditional Authorities; any temporary use of land and any potential damage to grazing or other resources should be negotiated. If any land use fees or compensation are to be paid (the stakeholder meeting notes reference payment of land use fees to conservancies as a positive impact, those should be formalized in the agreements. We urge transparency in these agreements and that they be shared with the Environmental Commissioner as part of compliance monitoring. | |
| | | Wildlife and Forestry Laws: Any off-take of wildlife or plant products is beyond the scope of the project and should be prohibited (no hunting, no harvesting of timber for camp fuel, | Noted. The enforcement of the code of conduct for employees' contracts has been added to the EMPS. |

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| | | <p>etc., without permits). The conservancies typically manage wildlife use; project personnel should be briefed that illegal hunting/poaching will not be tolerated – the ESA did identify the risk of illegal hunting by exploration workers in conservation areas. The EMP should include a code of conduct for workers in this regard.</p> | |
| 20. | | <p>5. Cumulative Impacts and Regional Considerations</p> <p>Overlapping Conservancies and Multiple EPLs: Notably, Marienfluss and Orupembe Conservancies are each facing several concurrent exploration projects:</p> <ul style="list-style-type: none"> ✓ Marienfluss Conservancy is overlapped by EPL 10736, 10740, and 10742 – three exploration projects in the same community area. This creates “extraordinary cumulative pressure” on the conservancy’s environment and its people. | <p>The cumulative impact assessment has been added to the Reports (section 7.5).</p> <p>After thorough consultation with the Conservancies, there will be no work to be conducted within the Orupembe Conservancy. Hence, no consent was granted for exploration activities in Orupembe. This has been indicated in the Scoping Reports and EMPs that no activity will be done within the Orupembe Conservancy (as a condition to the issuance of the ECCs).</p> |

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| 21. | | <p>Orupembe Conservancy is in an even more precarious position, being partially overlapped by four EPLs: 10736, 10737, 10740, and 10742. In essence, almost the entire conservancy is covered by one EPL or another. The cumulative consultation and management burden on Orupembe is immense, and the environmental impacts (noise, dust, poaching risk, water use) could multiply if all projects proceed. Yet each ESA treated Orupembe's portion in isolation. We strongly feel a joint impact assessment or at least a coordinated strategy, is needed for Orupembe. The worst-case scenario of four exploration teams operating independently could lead to chaotic overlaps, conflicting schedules with the community, and uncoordinated environmental mitigation that leaves certain impacts unchecked.</p> | <p>This is well noted. It is important to note that the four EPLs are sister companies and supported by one mother company. Therefore, they will actively collaborate and plan exploration works in such a way that a single drilling rig and team are present in an area at a time to work on individual EPLs. This is to minimize the cumulative impacts from four team members (one for each EPL present in the area). Added to that, as per your (LAC) suggestion (at the end of section 7 of the comments), the EPLs will be treated as a collective project with a unified environmental management strategy. Even if separate, they should be encouraged to collaborate for the sake of the environment and communities.</p> <p>It is of utmost importance to note that after thorough consultations with the Conservancies, there will be no work to be conducted in the Orupembe Conservancy. Hence, no consent was granted for exploration activities in Orupembe. This has been indicated in the Scoping Reports and EMPs that no activity will be done within the Orupembe Conservancy (as a condition to the issuance of the ECCs).</p> |

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| 22. | | Need for Regional or Strategic Environmental Assessment Approach: We recommend that the Ministry of Environment, Forestry, and Tourism (MEFT) consider the five EPL projects together when evaluating the ECC applications. It may be appropriate to request a cumulative impacts addendum or to conduct a higher-level Strategic Environmental Assessment (SEA) for exploration in the Kunene communal conservancies. Short of a formal SEA, proponents and consultants should, at a minimum, engage in information sharing and coordination among themselves. | This is well noted, and we hope that the MEFT considers this for future implementation. This is because the MEFT would need to consider and plan for this type of exercise before they can implement it, if they deem it necessary. |
| 23. | | Specific cumulative issues to highlight: ✓ Water Resource Stress: As discussed, if more than one EPL project intends to draw water from, say, Okangwati settlement's supply or the Kunene River, the combined volume could impact the source. One project might have a negligible effect, but five projects together could deplete a local borehole or require so many water truck trips that it | The cumulative impact assessment has been added to the Reports under Table 7-4, section 7.5. The water abstraction/supply use options and management measures have also been updated in the Report and EMP, respectively. The recommendations on coordinated water resources use and management have been noted. |

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| | | <p>disrupts community water access. The ESAs should collectively examine whether there is a scenario in which, for example, Okangwati's sustainable yield is exceeded by multiple exploration users. If so, alternative water sources or phasing of use must be planned. This is precisely the kind of issue a cumulative lens reveals. We advise that MEFT and the Department of Water Affairs review all water use plans for these EPLs in aggregate. A coordinated water supply plan (perhaps designating different sources for different projects, or setting a maximum quota per source) might be warranted.</p> | |
| 24. | | <p>Wildlife and Habitat Connectivity: With multiple EPLs contiguous or overlapping, nearly the entire corridor between Marienfluss and Orupembe (and surrounding) may be subject to exploration activity. Disturbance in one area can push animals into another, which may then also have an ongoing project – effectively leaving wildlife with few</p> | <p>This has been added to the EMPS under "Cumulative Impact Management and Inter-Project Coordination" row in the mitigation measure table.</p> <p>It is of utmost importance to note that after thorough consultations with the Conservancies, there will be no work to be conducted in the Orupembe Conservancy. Hence, no consent was granted for exploration activities in Orupembe. This has been</p> |

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| 25. | | undisturbed refuges. One analysis noted EPL-10740's location between other EPLs could act as a wildlife movement barrier if all areas are active simultaneously. Cumulative impact management could entail ensuring there are "quiet zones" at any given time – perhaps by scheduling so that not all EPLs conduct invasive activities at once, allowing wildlife some respite in between. Additionally, all projects could collaborate on a joint wildlife monitoring program, sharing data on sightings or incidents, to better understand regional wildlife impacts rather than piecemeal data. | indicated in the Scoping Reports and EMPs that no activity will be done within the Orupembe Conservancy (as a condition to the issuance of the ECCs). |
| | | Community and Institutional Capacity: Conservancies like Marienfluss and Orupembe have small management teams. They now have to interface with multiple companies and consultants, attend multiple meetings, and review multiple documents. This is already causing consultation fatigue. There is a risk that important issues or commitments fall through the cracks simply | This is well noted and highly appreciated. This approach will be implemented and monitored. |

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| | | because community leaders are overburdened. We recommend a solution: coordinated consultations. | |
| 26. | | Landscape Fragmentation: Each exploration project may create some tracks, campsites, and cleared areas. Cumulatively, this could start fragmenting the landscape (especially if not all sites are perfectly rehabilitated or if new access routes are pioneered in previously roadless areas). The scenic wilderness character of these conservancies is an asset for tourism and cultural value, but multiple exploration footprints can detract from this. Therefore, a cumulative mitigation approach could be to share infrastructure where possible. | |
| | 6. Community Engagement and Consultation Process | | |
| 27. | | Consultation Conducted: We note from the ESAs that a combined public meeting was held on 21 June 2025 at Marienfluss Community Campsite, involving community | The communities were represented in the meetings as each Conservancy was represented, as well as Traditional Authority members. Given the difficulty in accessing most of the EPL areas or arranging several meetings, some communities could only be represented by conservancy management and available traditional authority members, who indicated that they would convey |

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| | | <p>members and stakeholders from Marienfluss and Orupembe (and possibly other areas). It is reported that 25 people attended, including the consultant team and one representative of each proponent. We are concerned that this attendance number is quite low relative to the broad geographic spread and multiple communities involved. While remote locations and difficult logistics no doubt made it challenging, 25 people (minus project staff) likely means only a handful of community representatives were present. This raises questions: Were all conservancies and Traditional Authorities from each EPL area adequately notified and able to attend? Was the meeting location accessible for others (e.g., Sanitatas or Okondjombo communities for EPL-10737, who are far from Marienfluss)? There is a risk that some affected parties (especially for EPL-10737, 10738, which are more to the south) did not participate meaningfully in this meeting.</p> | <p>the project intentions to the communities. However, further community meetings will be held again as part of project planning. The meeting was combined due to the fact that there was a Conservancy Management Workshop in Marienfluss during that week. When Serja Consultants reached out to the Conservancies about the EIA consultation meetings, they recommended that we meet them in Marienfluss while they would be in one place for their Workshop. However, project planning meetings will be held with the communities in due course, which is also one of the recommendations for the ECC applications.</p> |

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| 28. | | <p>Coverage of Issues: The meeting minutes in the ESA indicate that those present did voice some important expectations: prioritization of local employment, transparency and updates from the proponent, a follow-up meeting after ECC issuance, and returning to agree on a way forward once licenses are issued. The community clearly seeks ongoing involvement and information access throughout the project cycle – not just one-off consultations. We urge that the final EMP explicitly include these commitments: for example, commit to hold a feedback meeting with the community once the ECC is granted (and share key conditions of the ECC and plans), and commit that before any exploration commences on the ground, the proponent will meet again with the local Traditional Authority and conservancy to outline the work program and timing. Essentially, consultation should be an ongoing process, not a single event.</p> | <p>This is highly appreciated and noted. A recommendation has been made to the EMP and the Scoping Report conclusion for the community feedback meeting as part of the planning phase.</p> |

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| 29. | | <p>Consultation Outreach: We recommend that additional efforts be made to reach all affected communities. If combined meetings are logistically necessary, consider rotating venues or having multiple sessions. For instance, one meeting could be held in Orupembe (for Orupembe and adjacent communities), another in Opuwo or Okangwati (for easier access by more distant stakeholders like government, regional council, or communities further south). Translation is key – presentations and documents should be explained in the local languages (most likely Otjiherero for Himba/Herero communities). We did not see mention of whether interpreters were used; we assume they were, but it should be ensured. Also, given literacy levels in rural areas, distributing executive summaries or BID documents in plain language (possibly with some visual aids) can help inform those who can't review a full report.</p> | <p>This is highly noted for ongoing and future community consultation meetings. The meeting proceedings were done.</p> <p>Furthermore, after thorough consultations with the Conservancies, there will be no work to be conducted within the Orupembe Conservancy. Hence, no consent was granted for exploration activities in Orupembe. This has been indicated in the Scoping Reports and EMPS that no activity will be done within the Orupembe Conservancy (as a condition to the issuance of the ECCs).</p> |

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| 30. | | <p>Information Access: We are concerned about the ability of community members to review the Draft ESA reports and EMPs themselves. These are technical documents and might not have been easily available in the conservancies (likely only accessible in Windhoek or Opuwo via the MEFT portal). It's imperative that after this comment period, when revised final reports are ready, the consultant should provide copies to the conservancy offices or Traditional Authorities. Transparency will build trust – for instance, sharing the EMP with conservancy game guards and committees so they know what commitments the company has made, allows them to help monitor compliance on the ground. The Legal Assistance Center is ready to assist in facilitating an understanding of the documents if needed.</p> | <p>This is well noted. Printed copies of the documents will be arranged for delivery to each conservancy.</p> <p>We highly appreciate the LAC Team's willingness and readiness to assist in facilitating an understanding of the documents if needed. We will definitely look into this and update you on it.</p> |
| 31. | | <p>Grievance Mechanism: The EMP should outline how the community can raise concerns or complaints during the project.</p> | <p>The Grievance Mechanism has been added to the EMPs as Chapter 6.</p> |

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| | | <p>Who can they contact if, say, they observe environmental damage or have a conflict with exploration personnel? A grievance redress mechanism (even an informal one, like a designated community liaison or a logbook at the conservancy office) would improve responsiveness. This could tie into the suggestion that each EPL proponent has a Community Liaison Officer, possibly hired locally, to maintain dialogue with communities throughout the exploration period.</p> | <p>This is noted, and the Community Liaison Officer (CLO) has been added to each EMP of implementation (to be appointed during the planning phase).</p> |
| 32. | | <p>Benefit Sharing and Local Opportunities: While exploration is short-term and low-intensity, it should still aim to benefit locals where possible. We note that one positive impact identified is temporary employment for locals and payment of land use fees to conservancies and traditional authorities. We support these measures and would like to see them guaranteed. The number of jobs in exploration is small, but even a few watchmen, guides, or labourers should, as a</p> | <p>This has been noted and has been added to the EMPs under "Land use fees for socio-economic development and Corporate Social/Community Responsibility" measures of the planning phase.</p> |

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| | | <p>priority, be hired from the nearest communities. Likewise, any community development projects or contributions (sometimes companies give donations to conservancies or assist with water infrastructure as goodwill) should be discussed with the community so they align with local needs. Ensuring benefits, though modest at the exploration stage, helps offset the community's tolerance for the disturbance and sets a tone of partnership.</p> | |
| 33. | | <p>Addressing Fears and Expectations: In our experience, communities often have anxieties about exploration leading to land loss or unchecked mining. It should be clearly communicated that exploration does not mean automatic mining, and that any mining would require a fresh agreement and assessment. Managing expectations is crucial – both to avoid false hope (some may think a mine will bring riches) and to alleviate unfounded fears. The consultation should</p> | <p>This is well noted and highly appreciated. This was also mentioned in the consultation meetings and engagement. However, the emphasis will be continued in the next community engagement meetings to ensure that there are no expectations of a mine or mining activities at this stage or when exploration starts in the future.</p> |

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| | | also carefully distinguish between what is being proposed now (minor drilling and sampling) versus the concept of a large mine. We recommend that the proponent and consultant continue to emphasize this distinction in all community engagements. On the flip side, any legitimate long-term concerns communities have (like "will we be relocated if a mine comes?") should be noted now and addressed at the proper time with transparency. | |
| 34. | | 7. EPL-Specific Observations | The comments have been noted and considered. |
| 35. | | Transition from Exploration to Mining – Future Framework | The points raised here are well noted and recorded for future consideration, should one or some of the EPLs show positive results to advance into a mining license or licenses. The due process for a mining license application EIA Study/ies will be followed on a detailed and high-level approach. |