

ENVIRONMENTAL SCOPING ASSESSMENT (ESA)FOR THE PROPOSED PROSPECTING AND EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENCE (EPL) NO. 10500 LOCATED NORTH OF OMATJETTE, IN THE DAURES AND OMARURU CONSTITUENCIES, IN ERONGO REGION, NAMIBIA

COMMENTS FROM OTJOHORONGO

Background Information

Excel Dynamic Solutions (Pty)Ltd held a community consultative meeting on the 25th of November 2025 at Otjohorongo on behalf of the proponent, Phoenix Mineral Development (Pty)Ltd to;

- inform the community on the planned exploration and prospecting activity;
- act on behalf of Phoenix Mineral Development (Pty)Ltd in obtaining the Environmental Clearance Certificate (ECC) for prospecting and exploration activities on Exclusive Prospecting License (EPL)No.10500, which covers over 60% of Otjohorongo grazeland and residential area.
- Solicit comments for input into the Environmental Scoping Assessment (ESA)

Therefore, we share our comments on the listed activity and how the Otjohorongo community will be impacted by the EPL no.10500. Firstly, we dive into the definition of the activity as it pertains to the ECC application before the office of the commissioner, and by looking at the extracted definition from Google on the meaning of the planned activities as it relates to the ESA, Prospecting and Exploration: *search for mineral deposits, especially by drilling and excavation. exploration mine (or more accurately, mineral exploration) is the initial scientific process of finding and evaluating commercially valuable mineral deposits underground, using techniques like mapping, soil/water sampling, and drilling to build geological models and determine economic viability, distinct from the actual mining (extraction) phase that follows a successful discovery.*

Otjohorongo is heavily invaded and colonised by prospecting and exploration activities that impacts the livelihoods of the inhabitants severely. The area is predominantly subsistence farming and livestock forms the major part of the farming activity. The area size is already compromised with the growing human and livestock population coupled with diminishing rainfall patterns. Previously, mining of granite stone, from companies such as Ekukungu, Best Cheer et al has left the area in greater devastation and invaded on the historical archaeological rock painting of what is now known as the “Otjohorongo Granite Hill”. Recent history of similar mining activity taking place at **Otjivero** has testimony to the fact that regardless and irrespective of whether an activity entails exploration, prospecting or mining, the community stands to lose a large share of the only land they can-do faming and produce for sustainability.

IMPACT FORESEEN

THREATENING BIODIVERSITY AND HUMAN EXISTENCE

The process comprising of digging pits for exploration and extraction results in volumes of waste consisting of dust and small pieces of rock and the debris covering the soil may alter its natural composition. The waste might also contain toxins from the process, which pollute the soil, destroy the habitat of plants and make the land dangerous to use for farming.

The drilling, detonation of explosives and use of production machinery and transportation vehicles cause a lot of noise pollution that disturbs animals and people living close by, especially at night.

Furthermore, there is always a degree of contamination from oil and other toxic substances used in the process. The community have reported cases of several children with illnesses related to water contamination at Otjohorongo Granite Mines in the past, a testimony of potentially harmful chemicals used in the process of exploration and prospecting, a major component although unverified that could also be leading to ground water contamination, the only source of water supply in the area.

INDIGENOUS PLANTS AND SPECIES

These community speaks from a reference point of view when it relates to mining related activities (including prospecting and exploration), as it bears evidence to previous such activities that has impacted the biodiversity and subsequently the livelihoods of the inhabitants. The referred effects lead to the destruction of habitats and biodiversity which in turn would affect any local community whose livelihood depends on the natural resources on the land surrounding the exploration and prospecting activity.

Destroying habitats through land clearing, contaminating water and soil with heavy metals and chemicals, causing erosion, and creating pollution (air, noise, light) that disrupts fragile desert ecosystems and endemic species, ultimately leading to habitat loss, species decline, and potentially permanent biodiversity loss is a subsequent point of concern for careful consideration.

The past operations have caused major loss of a variety of indigenous species (fauna and flora) during various phases of exploration and prospecting leading to the extraction of the resources. Irreplaceable damage, irreversible impact of the natural features as a result of the numerated operations.

LAND AND ACCESS RIGHTS

This is the stage at which exploitation of natural resources has the potential to exploit host communities and also taking into consideration that, the earliest impact on the mineral cycle occurs at the exploration stage. In the past, large acres of our land were cordoned off and rezoned into mining no go areas, leading to loss of farming land in an already insufficient farming arena. As related earlier, Otjohorongo Granite Hill took a portion of our grazing land, Otjivero as another example lost over 5 thousand hectares of grazeland due to same activities as projected in the ESA. Land and access rights can come into conflict at the exploration stage, because it is on the same land our livelihoods hang in the balance, where we derive food and productivity. It is the same land where biodiversity exists, grazeland is sought and inhabitants resides.

The area under the EPL no.10500 is in the final stages of being declared as a Community Forest for better management and conservation of our natural resources, the declaration is soon to be gazetted. The area is also home to free ranging and roaming desert elephants whom the local communities are adopting in the manner of cohabitation with conservation as a key element. The communal area under the EPL falls under the Zeraua Tradional Authority.

RECOMMENDATIONS/CONCLUSION

The Otjohorongo community has therefore noted the mushrooming interest in minerals prospecting and exploration, amidst of growing concern as it conflicts with residential and farming rights, the impact on biodiversity. Experiences of similar activities has been bitter and had saddening endings, social responsibilities from the prospecting and exploration proponent yielding zero positive results, no investment on road upgrade and infrastructure development, and neither compensation nor rehabilitation from the extraction of the precious mineral deposits that our area bears in abundance ever took place as promised. The community have full knowledge and absolute respect for national laws governing the mining industry, however we are not so certain about compliance, adherence and enforcement from the entities responsible to guard and protect our precious natural resources.

Therefore, the **Environmental Management Plan** setting out how environmental degradation can be prevented or minimised should be shared in the same manner as the soliciting of the scoping for the environmental assessment and subsequent reports on all operation have to be provided to the Otjohorongo community.

The Otjohorongo community is also demanding **direct discussion with the affected**, specifically free, prior and informed consent (“FPIC”) of land rights holders, has been entered into as opposed to the Zeraua Traditional Authority (ZTA) in relation to the rights and obligations of EPL rights holders. The focus on consent from broader communities in relation to land is to avoid unrestrained relationships between the EPL holder and the affected land rights holders, and also taking into consideration that the EPL area falls within a **Community Forest soon to be declared**. This also to ensure that, consensus and consent of indigenous peoples must be determined in accordance with their customary laws and practices.

The community is further cautioning against the occupation and invasion of the **Otjohorongo Granite Hill** as there is a directive from the National Arts Council to declare that area as a national heritage site because of the archaeological rock painting evidence. Namibia is party to the UNESCO World Heritage Convention on April 6, 2000.

In line with **employment opportunities and water security**, the community would like full benefit (employment), and in compliance with existing laws governing water supply and resources management, drilling of boreholes should be in collaboration and consultation with the Otjohorongo community and not individuals as has been the case in the past.