

**COMMENTS AND INPUTS FROM THE EIA CONSULTATION AND ENGAGEMENTS (EXTRACTED FROM THE PUBLIC CONSULTATION MEETING MINUTES)**

**Environmental Impact Assessment (EIA) Study for The Proposed Dune Sand Collection Activities within the Tses Village Council Jurisdiction of the IlKharas Region - Application for Environmental Clearance Certificate (ECC)**

The key comments and issues made during the EIA consultation process were recorded and noted as presented in Table 1.

**Table 1: Key Issues, suggestions, and comments received during the EIA consultation process for the Dune Sand Collection (mining/extraction) in Tses Village**

No.	Name of the Speaker/Commenter & Capacity	Comment/Issue/Suggestion	Response provided by:
1	<b>Mr. Simon L. Kooper: Tses Community Member &amp; Member of the TCDC</b>	<p>Thank you for the opportunity and for taking the time to come talk to us about the issue of our dune sand in the Village. This issue has been ongoing for the past 4 to 5 years. We are also aware that the project does not have the proper and required documentation for the activities.</p> <p>My concerns, which are basically what the rest of the community is concerned about, are as follows:</p> <ul style="list-style-type: none"> <li>a) The site is not even fenced off to protect the children from falling in when they are playing on that side during activities. Thus, community safety and health are compromised.</li> <li>b) There is also an issue of a visual impact because the site is close to people's sight/village, and cemetery on that side. Can this sand collection not be relocated elsewhere, like towards the</li> </ul>	<p><b>Ms. Fredrika Shagama (EAP, Serja HGE Consultants):</b> Thank you, too, for managing to come meet with us and represent those who could not make it today. We are also glad that you will provide feedback to the rest of the community during your TCDC meeting. Yes, let us discuss these issues and see how they can be addressed going forward once the site and the activities are environmentally cleared and all documentation is in place.</p> <ul style="list-style-type: none"> <li>a) This is a genuine concern, and the site must be fenced off so that access is limited to authorized personnel only to ensure community/public health and safety, particularly for vulnerable members of the community, such as children who may want to play there. We visited the site earlier, before the meeting, and the site is unstable on the edges; thus, it would be easy for anyone to accidentally fall (slip) in the sand collection pit and injure themselves or worse.</li> <li>b) The concern about the visual impact and the suggestion on the alternative site is well noted. However, other factors need to be considered, for example, does the alternative site still fall within the Tses Village Council jurisdiction? If not within the Village council, then the site may fall under the jurisdiction of the</li> </ul>

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		<p>southeastern side of the village? There is a linear-like site with the dune sand and two rivers.</p> <p>c) Before the community asked the Village Council to halt the collection of dune sand until the papers are in order, we, as a community, are also not happy with the way things have been done regarding the sales of the sand to the company from Keetmanshoop that has been purchasing the sand. This is also because after all these years of selling the sand, there is no records of sales and the unit price we are told at which the sand was sold does not make sense at all (it is very cheap and it cannot contribute to help us solve the Village issues, such as development and the debt we owe to institutions like NamWater). Things need to change for the betterment of the whole Village.</p> <p>d) We believe that as a country, we have to be guided by the Namibian Constitution, the Labour Act, the Local Authority Act, and, on the local aspect, the Tses Personal Rules to ensure their incorporation in whatever activity we are conducting.</p> <p>There is a need for safety signage and a security gate installed at the site.</p>	<p>Regional Council and the responsible Traditional Authority. Further questions would be, since the alternative site would have a linear-like shape, probably over a stretched distance, would it be possible to fence off as a shape like that, compared to the current site? There is also a mention of 2 rivers crossing paths with the alternative site or close to the site. It is important to remember that water bodies such as rivers are protected not only by the environmental laws, but also by the Water Resources Management (WRM) Act No. 11 of 2013, whereby Part 12 of the Act further requires a license to remove sand and or gravel and the amount of material that can be removed from water courses for sale or commercial exploitation purposes. Furthermore, Part 12: Section 141 of the WRM Act prohibits a person from removing rocks, sand, or gravel within 100 metres (100m) of the riparian zone from the stream or river bank. This means that most of the sand that will fall within the 100m buffer of the 2 rivers at the alternative site will be lost (prohibited), thus reducing the amount of dune sand that can be collected for the project and sold. In addition to that, the existing site near the cemetery is already disturbed (due to previously collected sand); thus, it would be better to limit impacts at the existing site and cumulatively address them at the existing site. Thus, the alternative might not pass the alternative assessment criteria and factors for consideration.</p> <p>c) This is noted, Sir. We will consider this input for incorporation into the EIA documents to help both the Tses Village Council and the community make the most of the resources and improve the Village going forward.</p> <p>d) This is well noted. The applicable legal framework that governs the dune sand collection and associated activities will also be included in the EIA Scoping Report (as it is usually required for EIA studies).</p> <p>This is well noted and an important safety and security measure for the site.</p>
2	<b>Mr. Gabriel Xarageb: Tses Community Member &amp; Member of the TCDC</b>	There is also an issue of intimidation between the administration and politicians at the expense of	<b>Ms. Fredrika Shagama (EAP, Serja HGE Consultants):</b> Thank you for this input.

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		<p>communities. This is generally one of the concerns I have observed in most, if not all, Namibian institutions, not necessarily just Tses Village. Therefore, if we are to build our country, starting from our local institutions and leaderships, we need to put the growth and betterment of communities first before politics, so that we can serve the people who entrusted us to lead them and make sound and informed decisions on their behalf.</p>	
3		<p>As it was mentioned by Mr. Kooper before me, proper sales of the dune sand should be made, based on its real value, so that the income can help to grow the Village, because the previous information on sales does not look like it would contribute to the real growth and improvement of the Tses Village. There is also a lack of sales records for the dune sand collected and sold. Therefore, this should be improved going forward by ensuring that there are proper records of sales of sand to improve transparency and earn back public/community trust.</p>	<p><b>Ms. Fredrika Shagama (EAP, Serja HGE Consultants):</b> This is well noted.</p> <p>We will also expect you to help with sending us the letter of collective comments from your community feedback meeting after this meeting, so that we can incorporate what we have not recorded in this meeting into the EIA documents (the EIA Scoping Report and EMP).</p>
4	<p><b>Mr. Bryan Gauseb: Tses Community Member &amp; Chairperson of the TCDC</b></p>	<p>The Tses Village Council approached us, stating that the dune sand mining should be allowed so that the Village Council can pay off the debts at NamWater. We also learned that there is no proper documentation, such as the ECC, for the project, but the Village Council also informed us that the ECC application has started, and we agreed that it is a good thing. However, should the ECC be issued for the dune sand collection, we (the TCDC) need to sit</p>	<p><b>Ms. Fredrika Shagama (EAP, Serja HGE Consultants):</b> This is well noted. Yes, I agree that the site will need to have proper safety and security signage, include a security gate, shade for the personnel stationed on-site during the day, ablution facilities (toilets), and a potable water tank or container for the on-site personnel, as well as appropriate personal protective equipment (PPE) for workers at the site.</p>

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		<p>down with the Village Council to discuss a few things and how things should be done going forward. These aspects will cover the sales and records of the dune sand sold/transported from the site, how the site should be run, and the installation of safety signage and a security gate at the site.</p>	
5	<p><b>Mr. Samuel Goliath: Soutput via Tses &amp; Member of the &amp;  Hai- Khaua Traditional Authority</b></p>	<p>I agree with all the points raised by the previous speakers, and they would really be put into consideration for the betterment of the Village and Community at large. We are not against development because it is through development that we can grow as communities and a country. However, things should be done properly for community development while protecting the environment to ensure sustainable development, too.</p>	<p><b>Ms. Fredrika Shagama (EAP, Serja HGE Consultants):</b> This is well noted. Thank you.</p>