Environmental Assessment Scoping Report

Mining of G7 Materials from an **Existing** Borrow Pit for Use in Backfilling and Road Construction. The Borrow Pit is Situated on Portion 111 (a Portion of Portion 39) of the Consolidated Farm Tsumore No. 761, Tsumeb, Oshikoto Region

APP007393 **May 2026**

Assessed for **Rainy Day Investments 37 (Pty) Ltd**

Assessed by Ekwao Consulting

INFORMATION SHEET	
Project Title Name	An **Environmental Scoping Assessment** Report to Support an Application of an **Environmental Clearance Certificate** to Permit the Undertaking of a Listed Activity. Mining of G7 Gravel Materials from an **Existing** Borrow Pit for Use in Backfilling and Road Construction. The Borrow Pit is on Portion 111 (a Portion of Portion 39) of Consolidated Farm Tsumore No. 761, Situated within the Expanded Boundaries of Tsumeb Municipality, Tsumeb, Oshikoto Region
ECC Application No.	**APP007393**
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ABBREVIATIONS AND ACRONYMS

TERM	EXPANSION
BAT	Best Available Technology
EC	Environmental Commissioner
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
FSC	Forest Stewardship Council
GSN	Geological Services of Namibia
I&APs	Interested and Affected Parties
MAWLR	Ministry of Agriculture, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MW	Mega watts
NamRa	Namibia Revenue Authority
NHC	National Heritage Council
NSI	Namibia Standards Institute
OBPP	Otjikoto Biomass Power Plant
PPE	Personal Protective Equipment
RD37	Rainy Day Investments 37 (Pty) Ltd
SHE	Safety, Health & Environment
SME	Small and Medium Enterprises
TM	Tsumeb Municipality

TERMS AND DEFINITIONS

TERM	DEFINITION
Activity	Is definite in the Act as physical work that a proponent proposes to construct, operate, modify, decommission or abandon or an activity that a proponent proposes to undertake;
Aggregates	In Namibia "aggregate" typically refers to crushed stone, sand and gravel used in the construction industry. It serves as the primary structural filler in concrete, asphalt, and road bases. When using a square sieve with an aperture of 4.75 mm, 90% of sand will pass through a square sieve whilst at least 90% of coarse stone will be retained by such a sieve. The coarse stones retained on the sieve will constitute aggregates.
Alternatives	Means a possible course of action in place of another, or different means of meeting the general purpose and requirements of the activity, which may include alternatives to - (a) the property on which or location where it is proposed to undertake the activity; (b) the type of activity to be undertaken; (c) the design or layout of the activity; (d) the technology to be used in the activity; and (e) the operational aspects of the activity. The 'No-Go' alternative constitutes the 'without project' option and provides a benchmark against which to evaluate changes, development should result in net benefits to society and should avoid undesirable negative impacts.
Anthropogenic Impact	Human impacts on the environment which include changes to the biophysical environments, ecosystems, biodiversity and natural resources caused directly or indirectly by human activities including global warming, environmental degradation, etc.
Assessment	The process of collecting, organising, analysing, interpreting and communicating information relevant to decision making
Borrow Pit	Means an excavated area where soil, sand, gravel or other earth materials area available for construction projects. These materials, often called 'borrow' can be used for creating backfilling, roadbed elevation, embankments, landscaping, and other structural components.
G7 Gravel	In civil engineering and road construction, **G7** typically refers to a specific classification of natural or crushed gravel or soil used as a sub-base layer. It provides a stable, load-bearing foundation beneath the upper base course and paved surface.
Competent Authority	As definite in the Act, means any government ministry, regional or local authority, traditional authority or statutory body that has administrative jurisdiction over a proposed project or listed activity.
Construction	Means the building, erection or modification of a facility, structure or infrastructure that is necessary for undertaking of an activity, including the modification, alteration, upgrading or decommissioning or rehabilitation of a facility, structure or infrastructure.
Cumulative Impacts	In relation to an activity, means the impact of an activity that in itself may not be significant but may become significant when added to the existing and potential impacts eventuating from similar or diverse activities or undertakings in the area.
Decommissioning	The process which begins after termination or cessation of mining activities or mineral processing and ends with closure. It involves, amongst others, the removal of unwanted infrastructures, making safe of the dangerous excavations and surface restoration so as to minimise the adverse environmental impacts of mining activities remaining after cessation of operation.
Diversity	Means the variability among living organisms from all sources, including amongst others, terrestrial and aquatic ecosystems and the ecological complexes of which they are part, and this includes diversity within species, between species and of ecosystems;
Environment	As defined in the Environmental Assessment Policy and Environmental Management Act - "land, water and air; all organic and inorganic matter and living organisms as well as biological diversity; the interacting natural systems that include components referred to in sub-paragraphs, the human environment insofar as it represents archaeological, aesthetic, cultural, historic, economic, paleontological or social values".
Environmental Clearance Certificate	A certificate and associated conditions issued in terms of the Environmental Management Act, authorizing a listed activity to be undertaken.

Environmental Impact	A description of the potential effect or consequence of an aspect of the development on a specified component of the biophysical, social or economic environment within a defined time and space.
Environmental Management Plan	A working document which contains site project specific plan developed to ensure that environmental management practices to eliminate and control environmental impacts are followed during the developmental phases of that site, project and or facility and would normally consist of construction phase, operational phase and decommissioning phases.
Evaluation	Means the process of ascertaining the relative importance or significance of information, the light of people's values, preference and judgements in order to make a decision.
Gravel Reserve	A reserve is that amount of the resource which has been quantitatively proven through drilling and other sampling methods for which the level of confidence is high.
Gravel Resource	The extent of extractable volume is estimated with a low level of confidence, i.e. the resource is only inferred (estimated) from geological evidence and assumptions but has not been verified via drilling and other applicable sampling methods.
Hazard	Anything that has the potential to cause damage to life, property and/or the environment. The hazard of a particular material or installation is constant; that is, it would present the same hazard wherever it was present.
Interested and Affected Party	Any person, group of persons or organisation interested in, or affected by an activity; and any organ of state that may have jurisdiction over any aspect of the activity.
Mitigate	The implementation of practical measures to reduce adverse impacts.
Significant Effect/Impact	Means an impact that by its magnitude, duration, intensity or probability of occurrence may have a notable effect on one or more aspects of the environment.
Non-compliance	Issues that are in direct non-compliance with the requirements, commitments and/or management measures as approved in the EMP.
Pollution	Means any change in the environment caused by – (a) any waste, substance or matter; or (b) noise, odour, dust or heat, emitted from or caused by any activity, including the storage or treatment of any waste, substance or matter, building and construction, and the provision of any service, whether engaged in by any person or an organ of state if that change has an adverse effect on public health or well-being.
Proponent	As definite in the Act means a person who proposes to undertake a listed activity;
Quarry	A type of open-pit mine where rocks, gravel and /or minerals are extracted.
Quarrying	Means a method of extracting construction materials from an open surface, i.e. building stones, slates, marbles, building sand either by drilling or blasting or cutting or simply excavation. Quarries principally produce sand and gravel and crushed rock for construction and these materials are usually described as' aggregates'
Sensitive Area	A sensitive area or environment is described as an area or environment where a unique ecosystem, habitat for plant and animal life, wetlands or conservation activity exists or where there is high potential for ecotourism.

1. PROJECT BACKGROUND

1.1 Introduction

Rainy Day Investments 37 (Pty) Ltd (**RD37**), a Tsumeb based company owns a commercial farm that it purchased about four years ago. The property, whilst privately owned, is situated within the expanded boundary of Tsumeb Municipality. On its property, there is an **existing** borrow pit from which gravel materials graded as G7 have been quarried for over 40 years.

The Otjikoto Biomass Power Station, currently being constructed by Nampower near Tsumeb, requires substantial volumes of G7 material for use as sub-base backfill for the main structures. Since the G7 materials from the borrow pit meet all the civil engineering specifications required for the biomass project, RD37 has been requested by the main contractor to supply the required gravel volumes.

In terms of the Environmental Management Act, the supply of gravel materials has triggered a listed activity which may not be undertaken without an Environmental Clearance Certificate (ECC) having been granted by the Environmental Commissioner (EC) in the Ministry of Environment, Forestry and Tourism (MEFT). The ECC is granted after an Environmental Impact Assessment (EIA) study has been conducted and a formal application submitted to the MEFT for consideration. To this end, RD37 has appointed Ekwao Consulting (Ekwao) to handle their ECC authorisation process.

1.2 Listed Activity

The primary listed activity under which the operation falls is presented in **Table 1** below:

Table 1: Listed Activity

Activity Category	Expansion
Mining And Quarrying Activities	**Paragraph 3.2:** Other form of mining or extraction of any natural resources whether regulated by law or not. **Paragraph 3.3** Resource extraction, manipulation, conservation and related activities.

1.3 Location

The borrow pit is situated on Portion 111 (a Portion of Portion 39) of the Consolidated Tsumore No. 761 which lies within the expanded boundaries of the Tsumeb Municipality. Taking the Tsumeb Magistrate Court as a reference point, Portion 111 lies to the southwest about 7 km away. It abuts the B1 highway to its north and the railway line to its west as more or less depicted in the Google earth image presented in Figure 1.

Access to the borrow pit is provided by a single-track gravel road leading from the B1 highway with a length of approximately 700 m. The distance from the borrow pit to the biomass power plant is about 6.5 km – all of it paved road with the exception of the access road.

1.4 Need and Justification

Over the years, materials excavated from the borrow pit have been primarily used for the maintenance and re-gravelling of gravel roads, within the town of Tsumeb with the Tsumeb Municipality acting as the main beneficiary.

The most recent inquiry for G7 materials from the borrow pit has been made for the construction of Nampower's 40 MW biomass-to-electricity plant. The capital cost for Otjikoto Biomass Power Plant (OBPP) has been reported as N$2.6 billion, and it is situated is ±6.5 km from the borrow pit. It is this specific inquiry which precipitated the ECC application.

OBPP combines renewable energy production with land restoration in the sense that the raw materials (wood chips) is harvested from encroacher bush on commercial farms within a radius of 100km of power plant. It is projected that the OBPP will consume about 250 000 tons of bush biomass annually resulting in land restoration of 20 000 hectares, based on a sustainable harvestable biomass yield of 12.6 tons per hectare. The harvesting of encroacher bush is conducted in a compliance with the requirements of the Forest Stewardship Council.

The benefits accruing to the land owners who participate in the project, and by extension to the entire nations are:

- Increased carrying capacity of rangeland which will make farms more productive;
- Enhanced eco-tourism as the wildlife viewing experience is improved;
- Increased farm value, potentially leading to more business opportunities;
- Increase in groundwater recharge;
- Improved scenic beauty as a diverse landscape is more visually appealing;
- Increased biodiversity, and
- Restored land can help preserve traditional farming practices and local heritage.

Currently, Namibia imports between 40% and 65% of its total electricity supply, making the country highly dependent on neighboring grids to meet domestic demand. The upcoming OBPP will generate about 40 MW of continuous baseload power, serving as an important step toward reducing this import dependency.

1.5 Rationale to Source Gravel from the Borrow Pit

From an environmental perspective, utilising the **existing** borrow pit is highly beneficial for the following reasons:

- There is an existing gravel road of about 700 m long which links the borrow pit to the B1 highway. An existing road eliminates the need to construct a new access road which is associated with clearing of pristine land, destruction of biodiversity, and land disturbance with the risk for soil erosion.

- Over the years, the borrow pit has proven to provide gravel materials that meet local industry specifications for sub-base (G7). Recent geotechnical investigation has confirmed proven reserves of over 800 000 m^3 which is more than sufficient to meet both, the short and long term gravel demands in and around the town of Tsumeb.

- The haulage distance from the borrow pit to the biomass power plant is about 6.5 km, and most of it is tarred road (B1 main road). The short distance has the advantages of reducing potential environmental impacts – reduced fuel consumption and greenhouse gas emissions, etc.

- RD37, the applicant owns the land and will operate the gravel extraction activities on the borrow pit. Therefore, RD37 is expected to manage operations under a comprehensive Environmental Management Plan (EMP), which ensures full rehabilitation and re-vegetation upon project completion.

1.6 Scope of the Study

The aims and objectives of the environmental assessment and the associated EIA and EMP report are to:

- Determine the potential environmental impacts emanating from the gravel extraction from the borrow pit, maintenance of existing infrastructure and possible decommissioning.
- Identify a range of management actions which could mitigate the potential adverse impacts to acceptable levels.
- Comply with the requirements of the Environmental Management Act (EMA) and Environmental Impact Assessment (EIA) regulations.
- Provide sufficient information to the Office of the Environmental Commissioner (OEC) so as to allow the Environmental Commissioner (EC) to make an informed decision when considering RD37's ECC application.

1.7 Assumptions, Uncertainties and Gaps in Knowledge

In undertaking this investigation and compiling the report, it has been assumed that:

- The information provided by the client, the applicant is accurate and unbiased.
- The scope of this investigation is limited to assessing the environmental impacts associated with the excavations of gravel (G7) material required backfilling and road constructions in and around the town of Tsumeb.
- No permanent structures such as workshop, office, laydown areas, construction camp site, etc. will be established on the borrow pit.
- The final scoping assessment report acknowledges its internal limitations, which stem directly from gaps associated with desk studies.
- The applicant will in good faith implement the management measures recommended in the EMP section of the report.

LOCALITY MAP

Portion 111 & Otjikoto Biomass Power Plan, Tsumeb Town & Townlands

Oshikoto Region

Legend:

Project Sites

Date	**April 2026**
GPS Coord.	-19.24598 S 17.67093 E

Prepared for:

Rainy Day Investments 37 (Pty) Ltd

Prepared by:

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Figure 1: Google Earth Image – Project Site

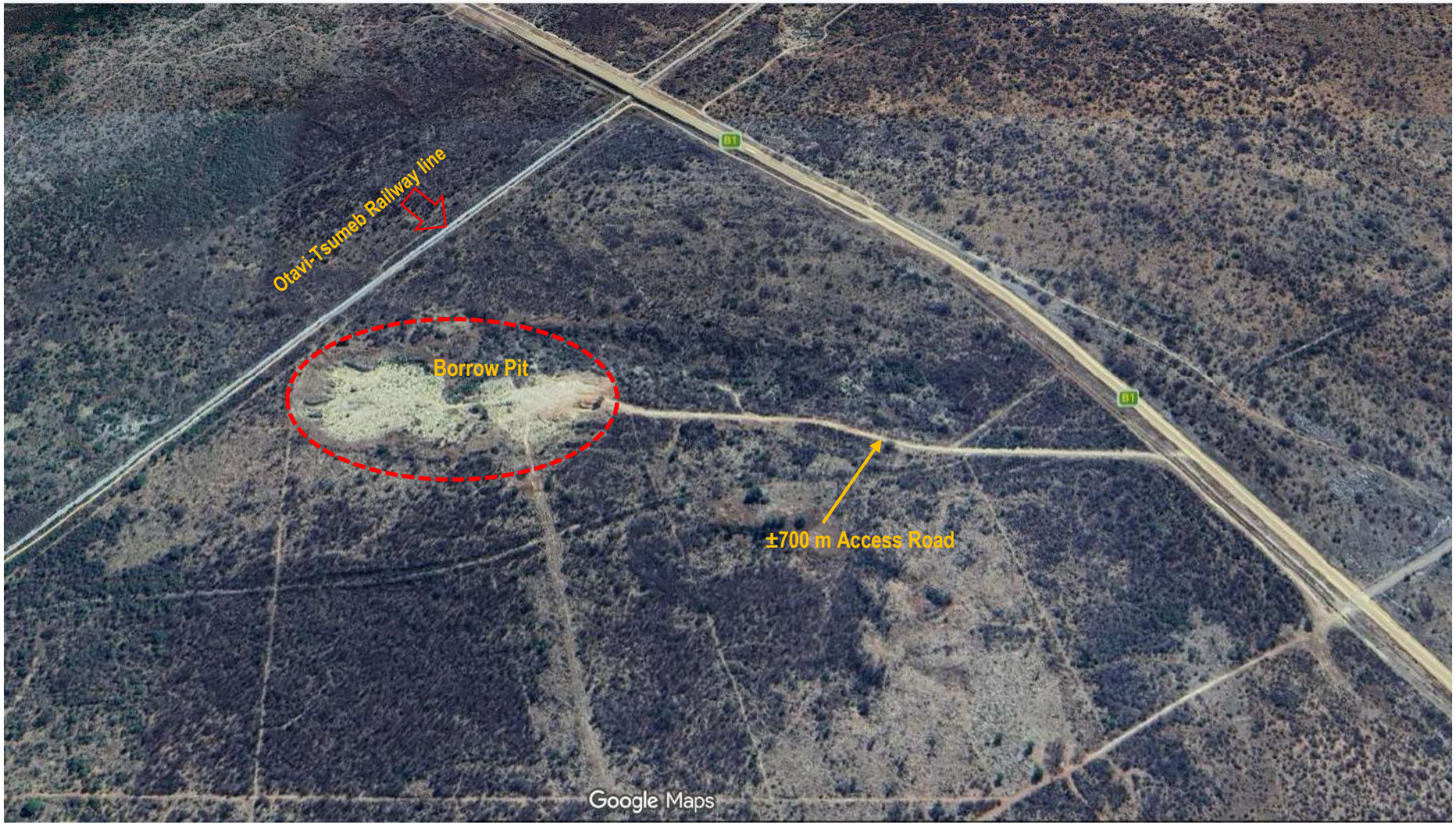

Figure 2: Location of the Borrow Pit

2. PROJECT DESCRIPTION

2.1 The Borrow Pit

As previously noted, the borrow pit on Portion 111 has been active for several years, and covers an area of approximately 4 ha. The site consists of two shallow open pits of varying depths and topographic elevations. The total length across the borrow pit from east to west is 330 m, while the width ranges between 45 m and 120 m. (Figures: 2 & 3). The core activities entails the extraction of weathered dolomite rock materials, a critical natural resource whose characteristics meet G7 specifications. The gravel is found underneath a fertile topsoil with a thickness of about 0.5 m.

The extraction process is straightforward and consists of two primary stages: the stripping and stockpiling of overburden (topsoil) to expose the weathered dolomitic sediments, followed by mechanical extraction of the exposed weathered rock. Because the dolomitic deposit is friable, heavy fragmentation methods like drilling and blasting are not required, allowing for continuous and low-impact excavation.

2.2 Core Equipment

It is essential to highlight that due to the specific nature of the material being extracted (weathered dolomite), the excavation process will exclusively employ a hydraulic excavator and TLBs. This quarrying operation will be characterized as a shallow surface operation, systematically creating "cuts" or mineable faces before transitioning to the subsequent cut. It is important to note that activities such as blasting, crushing and screening are not required.

The core equipment to be used at the borrow pit include the following:

- One (1) x Hydraulic Excavator (30 ton)
- One (1) x Bulldozer (occasionally for doze bigger boulders)
- Three (3) x Tipper Trucks
- One (1) Mobile Diesel bowser
- One (1) x Grader (occasionally to level the site & access road)
- One (1) x Bakkie (for supervisor)
- One (1) x Lowbed truck (to transport excavator & bulldozer on and from the site)

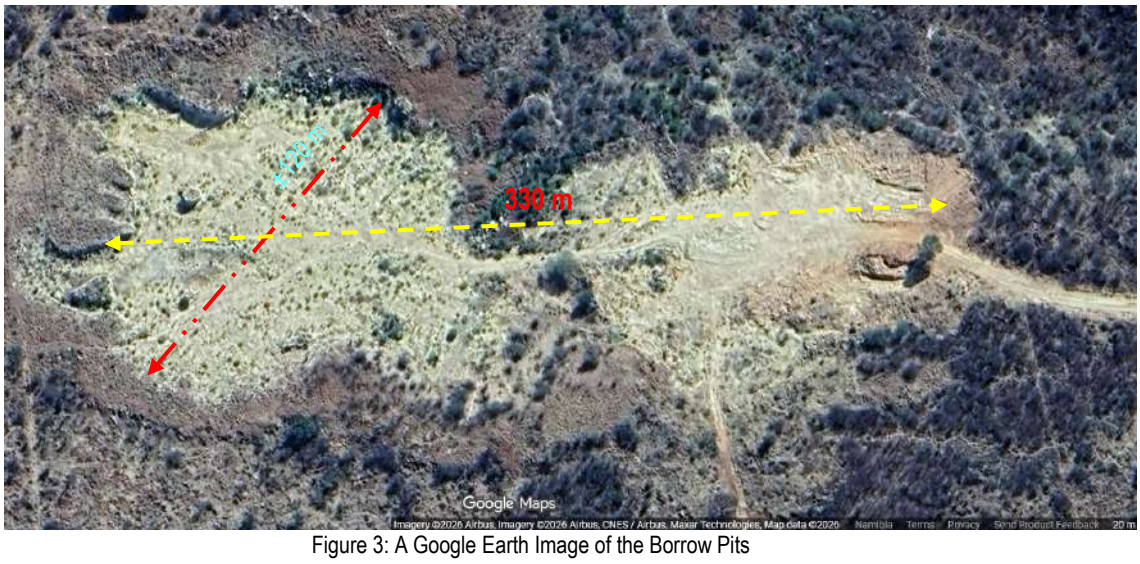

Figure 3: A Google Earth Image of the Borrow Pits

The proposed borrow pit is located within a historically quarried site with existing ecological degradation. While this reduces initial surface vegetation loss, renewed excavation poses distinct risks to soil stability and localized drainage. To mitigate these impacts, topsoil will be segregated, stockpiled at a maximum height of two meters to preserve soil microbes, and protection from wind erosion. This material will be utilized sequentially for site rehabilitation. Operational impacts will be mechanical, limited to a single excavator digging and two tipper trucks hauling the excavated gravel to the biomass construction site

Figure 4: Access road to the borrow pit

Figure 5: A stockpile of G7 material in the borrow pit

Figure 6: View of the borrow pit to the west

Figure 7: Evasive plant species dominating regrowth in older worked out sections of the borrow pit

Figure 8: Native vegetation recovering in recently worked out sections of the borrow pit

Figure 9: Topsoil stockpiled for rehabilitation

Figure 10: Typical vegetation outside the borrow pits

2.3 Support Infrastructure and Facilities

Normally, an operation of this nature will require support infrastructure and services as more of less described below. However, this operation will require zero permanent site infrastructure. Aside from one

hydraulic excavator and a potable chemical toilet, no workshop or maintenance yard, site office or equipment will remain on-site.

2.3.1 ROAD INFRASTRUCTURE

The borrow pit is accessed via an existing, well-maintained single-lane haul road of approximately 700 meters long. This road connects directly to the B1 highway and serves as the sole access point to the borrow pit, eliminating the need for new road construction. Upon closure of the borrow pit, the road will remain in place to support ongoing farming operations.

2.3.2 ELECTRICITY REQUIREMENTS

The core machine (excavator) used in the operation generates its own electricity. The borrow pit is therefore operated completely off-grid without the need for external electrical infrastructure.

2.3.3 WATER REQUIREMENTS

The quarry operation does not use water, but a 50-liter water container will be kept at the site for personnel use. During the 8-hour shift, the excavator operator will remain at the borrow pit the entire shift, while tipper truck operators will make frequent trips to and from the site.

2.3.4 WASTE HANDLING AND DISPOSAL

Minimal waste is expected to be generated during operations at the borrow pit. Waste and hazardous materials will be managed according to guidelines provided in the EMP section of the report. A designated, covered bin will be maintained on the borrow pit for general, non-hazardous crew waste, and will be emptied regularly. For hazardous materials, spill kits must be kept on-site at all times. Any oil leaks or fuel spills must be cleaned up immediately, contained, and transported to the designated hazardous waste area at the machine yard for safe, disposal as provided in the EMP.

2.3.5 SANITATION

During periods of gravel extraction, sanitation facility in the form of one well-ventilated portable chemical toilet has to be provided at the borrow pit. The facility must be placed on a stable, level surface, be maintained and serviced at regular intervals. Additionally, a separate, easily accessible supply of potable drinking water and hand-washing facilities (with soap and disposable towels) must be provided and restocked regularly.

3. PROJECT ALTERNATIVES

In an EIA, project alternatives are regarded as different feasible approaches or options for achieving the same development goals. By analysing various options, the option that minimises environmental risks /harm and maximises socio-economic benefits is identified and selected.

It is imperative that possible alternatives as analyzed are presented to the decision maker to help the EC in making an informed decision when considering the ECC application. For the proposed project, these alternatives were considered and analysed as follows:

- 'No-Go' Option
- 'Go-Ahead' Option
- Alternative Site Option

3.1 No-Project Option

Under this alternative, it is assumed that excavation of G7 material from the borrow pit is not permitted such that the status quo is retained. This alternative represents the ideal mitigation measure for the negative environmental and social impacts that are associated with gravel extraction - they will not occur. Conversely, the positive impacts of the project which include simulation of industrial development coherent with Vision 2030 and NDP6, i.e. creation of employment opportunities and revenue generation to the government will be lost.

While this scenario is ideal, the reality is that the borrow pit has been in existence for over 40 years and has good gravel materials. The negative environmental and social impacts associated with quarrying activities have, to some extent already occurred. Under the present circumstances, this alternative is therefore not viable.

3.2 The 'Go-Ahead' Option

This alternative envisions permitting the gravel extraction as proposed by the ECC applicant. It is the best approach to prevent economic losses, ensuring a steady supply of material to critical end-users, including the Otjikoto Biomass Power Project (OBPP). The successful implementation of this national project will benefit all Namibians. The borrow pit is close to the power station and sourcing from here will eliminate the need to haul gravel over long distances with increased fuel consumption and gaseous emissions. Provided the mitigation measures as presented in the EMP are implemented, the 'Go-Ahead Alternative is supported.

3.3 Get Alternative Site Option

The borrow pit has been in existence for many years, and as such the alternative site scenario is not considered as feasible proposition, both from the environmental and economic perspectives. Land clearing has been done for the borrow pit and the access road already established. Moreover, the scope and scale of the project as envisaged do not present serious environmental challenges that cannot be effectively managed.

The proposed mitigation measures are considered adequate to minimise the impacts to levels that do not warrant significant environmental damage. In addition, the existing site has suitable gravel materials in huge reserves to meet future demands without the need to establish any new sites.

4. REGULATORY FRAMEWORK

In this section applicable national legislation and ratified multilateral environmental agreements relevant to the proposed activities, are presented and briefly described.

4.1 Applicable Legislations

Applicable pieces of legislation are presented in **Table 2** as well as their applicability to the proposed project:

Table 2: List of Legislations applicable to the Activity

Legislation	Main Aspects	Applicability
The Constitution of Namibia	• Supreme law of the land. • Encourages the welfare of the people. • Provides for environmental protection. • Recognises international agreements and corporations.	All laws and regulations enacted by parliament must be in compliance with the Constitution.
Environmental Management Act (Act. No. 7 of 2007)	• Provides for the definition of the environment. • Promotes and encourages sustainable management of the environment when natural resources are exploited/extracted for the benefit of the residents/citizens.	Provides for a process of assessment and control of activities likely to harm the receiving environment.
Environmental Management Regulations (GG No. 4847 of February 2012)	• Heralded the implementation of the EMA almost five years after the Act was approved by the legislature; • Presents a list of activities that require an ECC prior to commencement, and • Regulates and provides guidelines on how EIAs must be conducted.	The proposed project is listed under the category: **Mining and Quarrying Activities** Section 3.2 : 'Other forms of mining or extraction of any natural resources whether regulated by law or not.'
Forestry Act Act No 12 of 2001	• Provides for the establishment of a Forestry Council and the appointment of certain officials as well as to consolidate the laws relating to the management and use of forests and forest. • Provide for the protection of the environment and the control and • Provides for the management of forest fires; • Provides for the preservation of Bees and Honey Proclamation,	Any tree with conservation status on the project site may not be uprooted without a valid permit
Petroleum Products Regulations and Petroleum Products and Energy Act (GG Notice 2000)	Regulates the petroleum industry including licensing, permits and and certification. **Section 3 (1)** states that (1) No person shall • operate a retail outlet or conduct the business of a wholesaler, unless authorised to do so under a retail license or wholesale license; • operate a consumer installation, unless authorised to do so under a certificate, and • shall possess or store any fuel. (2) No person shall possess or store any fuel except under authority of a license or a certificate approved by the Minister of MIME.	The project will make use of earthmoving machines (excavator, bulldozer, tipper trucks, etc.) which use petroleum products (oil, diesel, grease, etc.)
The Local Authority Act (No. 23 of 1992)	• Provides for the establishment of local authority councils to manage and handle the affairs of local government and defines the powers of the local councilors, duties and functions;	The project site is within the jurisdiction of the Tsumeb Municipality and local authority

	• Outlines the structure of local authority councils, including membership, elections, and management, and • Addresses issues such as infrastructure, service provision, taxation, and financial management of local authorities.	bylaws have to be complied with.
Labour Act (Act 11 of 2007 as amended)	• The Act contains extensive and detailed provisions relating to the basic employment conditions, rules regarding termination of employment, dismissals and disciplinary action; • It also provides for the prevention of trade disputes, unfair labour practices, regulates and controls collective job action, employment agencies and all matters incidental thereto, and • The Act also provides the right to the employees to speak about work conditions, the right to say no to unsafe work, the right to be consulted about safety in the workplace and the right to workers compensation.	People will be employed to work on gravel extraction site, Persons must be recruited and hired in compliance with the labour laws.
Public and Environmental Health Act (Act No. 1 of 2015)	• The Act provides for a legal framework for a structured more uniform public and environmental health system and for matters incidental thereto; • It deals and provides guidelines on noise generation and control thereof within an urban environment; • Also deals with waste management, handling or collection, waste disposal, waste recycling, sanitation, etc.;	Waste both hazardous and non-hazardous will be generated during gravel extraction at the borrow pit.
Hazardous Substances Ordinance (No. 14 of 1974)	• Provides for the control of hazardous substances with potential to cause harm, injuries and even death. • Also provides for the manufacture, handling, storage, sale, use, disposal, etc. of hazardous substances.	Fuel products – oil, petrol, diesel, grease, etc. used by machinery are considered hazardous substances.
Atmospheric Pollution Prevention Ordinance (No. 11 of 1976)	• Provides control of noxious or offensive gases and matters incidental thereto. • Requires best practical means for preventing or reducing the escape into the atmosphere of noxious or offensive gases produced by the scheduled process.	Gaseous emissions and dust will be generated during the operational phase of the project.
Water Resource Management Act (2004)	The following permits are required in terms of the Water Act: • Water abstraction permits; • Domestic effluent discharge permits (site offices, construction camp); industrial effluent discharge permits; • Water use for dust suppression; and water reticulation permits (pipelines), and • Will be superseded by Water Resources Management Act 2013 once the regulations are implemented in the future.	Water will be required for personnel consumption and cleaning purposes. Water must be obtained in a lawful manner.
National Heritage Act No. 27 of 2004	• No archaeological/heritage site or cultural remains may be removed, damaged, altered or excavated. • Section 48 sets out the procedure for application and granting of permits, such as the permit required in the event of damage to a protected site occurring as an inevitable result of development. Section 51 (3) sets out the requirements for impact assessment. • Part VI Section 55 Paragraphs 3 and 4 require that any person who discovers an archaeological site should notify the National Heritage Council	Provides steps to be followed when items of cultural and heritage resources are uncovered.

4.2 Multilateral Agreements

The Namibian government has ratified various international environmental agreements, some of which are presented in **Table 3**.

Table 3: Multilateral Environmental Agreements

Agreement/Protocol	Relevant Aspects
The Stockholm Declaration on the Human Environment, Stockholm 1972	• Ratified by Namibia in May 2001. • Recognizes the need for a common outlook and common principles to inspire and guide the people of the world in the preservation and enhancement of the human environment • Protects human health and the environment from highly dangerous, long-lasting chemicals (such as pesticides like DDT and industrial by-products like dioxins and furans) by restricting or eliminating their production and use
Paris Agreement (2015)	• Signed and ratified in 2016 • Commits Namibia to greenhouse gas reduction and climate-resilient development.
UN Framework Convention on Climate Change (UNFCCC)	• Ratified in 1995 to stabilize greenhouse gas concentrations. • Recognises that developing countries should be accorded appropriate assistance to enable them to fulfil the terms of the Convention
Kyoto Protocol	• Ratified in 2003 – an international environment treaty designed to combat global warming • Compels industrialised nations to reduce their greenhouse gas (GHG) emission
Convention on Biological Diversity	• Ratified in 1992, promoting sustainable biological use • EIAs must be conducted for projects that may negatively affect biological diversity.

5. THE RECEIVING ENVIRONMENT

This section details the environmental characteristics of the study area, evaluates their potential impacts, and identifies features that could affect operations.

5.1 Land Use and Capability

The study area and surrounding properties are predominantly commercial farmlands used for cattle grazing, game ranching, irrigated cash crops and dryland farming. RD37 acquired the 500-ha farmland with a view to establish the first urban village in Namibia. The plan is to subdivide the land into mixed-use development zones alongside agricultural plots ranging from 2 to 20 hectares. The development is intended to be self-sufficient in terms of water, power and sewerage placing to burden to the services of Tsumeb Municipality. According to the website of the project promotor (Lithon Projects), the village will include for the following:

- Walkable mixed-use neighbourhoods with a range of housing options,
- Working farms (with processing and packaging facilities) that provide fresh produce for the local community and for export
- Opportunities for the business to grow and flourish in the agriculture, tourism, and education sectors, and
- Conservation areas where residents and visitors can soak in the spectacular natural surroundings.

The project site is located in the highly productive "Maize Triangle" (Tsumeb–Otavi–Grootfontein), and benefits from exceptionally high rainfall in the country and vast, high-yield underground aquifers that make intensive commercial agriculture highly viable.

Challenges and or Potential Impacts
Primary concerns may include the loss of productive grazing and arable land accompanied by soil erosion, while an unrehabilitated borrow pit can pose a danger to livestock and wildlife falling into open pits injuring themselves.

5.2 Topography and Drainage

The topography of Portion 111 – the farmland on which borrow pit occurs, is predominantly flat to gently undulating rangeland, heavily characterized by the famous ‘karstveld’ – a landscape formed by the dissolution of soluble rocks such as limestone and dolomite, which creates unique underground water networks, caves and sinkholes.

While the project site itself is relatively level, the immediate surrounding geography features sections of highly sensitive karst mountainous terrain and rugged hills typical of the Tsumeb-Grootfontein-Otavi . At the borrow pit the topography is marked by heavy "bush encroachment" comprising of aggressive, densely packed invader woody species and shrubs.

Drainage is poorly developed in the area. Regionally, the site would fall within the catchment area of the Etosha Pan. The natural drainage in the general area surrounding the borrow pit is therefore characterized by westward and north-eastward flowing ephemeral rivers, such as the Omuramba Owambo and the Omuramba Omatako.

Figure 11: Typical bush encroachment around the borrow pit

5.3 Climatic Conditions

According to the 'Köppen classification', the project site is in a region which experiences warm, sunny days year-round with the year clearly divided into two main reasons: hot, wet summer and a dry, mild winter.

The Season: November to March

The season is considered the hot and wet summer with daily temperatures averaging between 30 ºC to 35 ºC peaking during October and November just before the heaviest rains arrive.

The bulk of the rainfall occurs during this period, with the wettest months typically being January and February, hence turning the surrounding vegetation lush and green. Average annual rainfall is between 500 and 600 mm.

The Season: April to October

This season is associated with a dry mild weather. During this season, the days are comfortable and warm with temperatures averaging around 25 ºC which makes it an ideal time for outdoor excursions and safaris. Rainfall is extremely rare during this period. During the months of June and July, there are significant temperature fluctuations with the mercury dropping in the ranges of 5 ºC and 10 ºC.

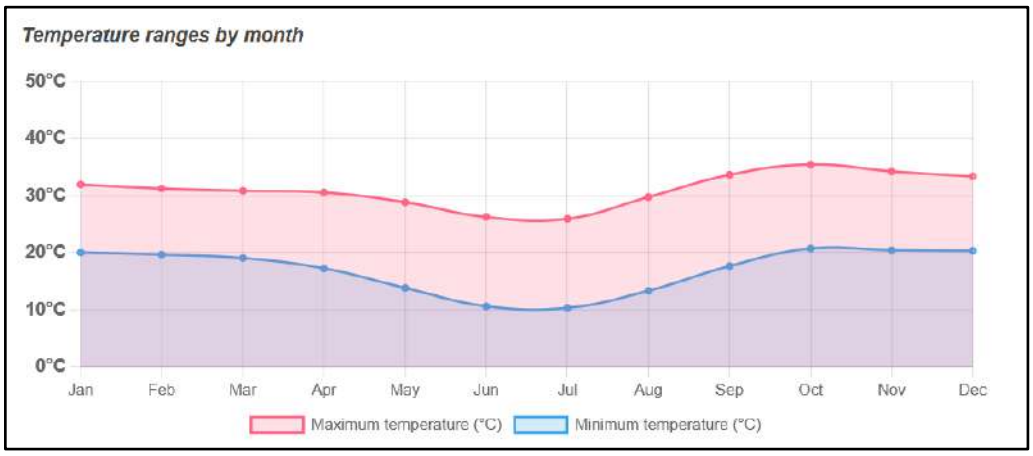

Figure 12: Average Temperature (Weather Spark)

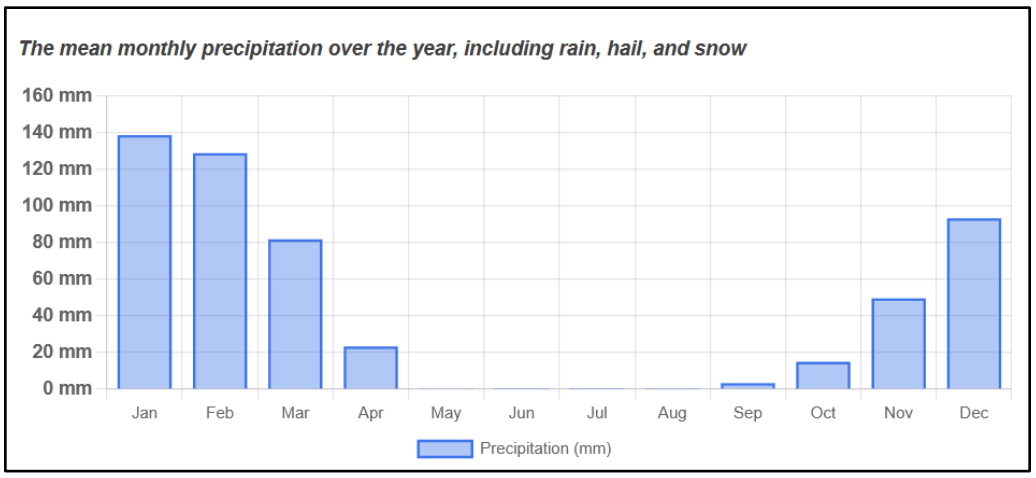

Figure 13: Average Monthly Rainfall (Weather Spark)

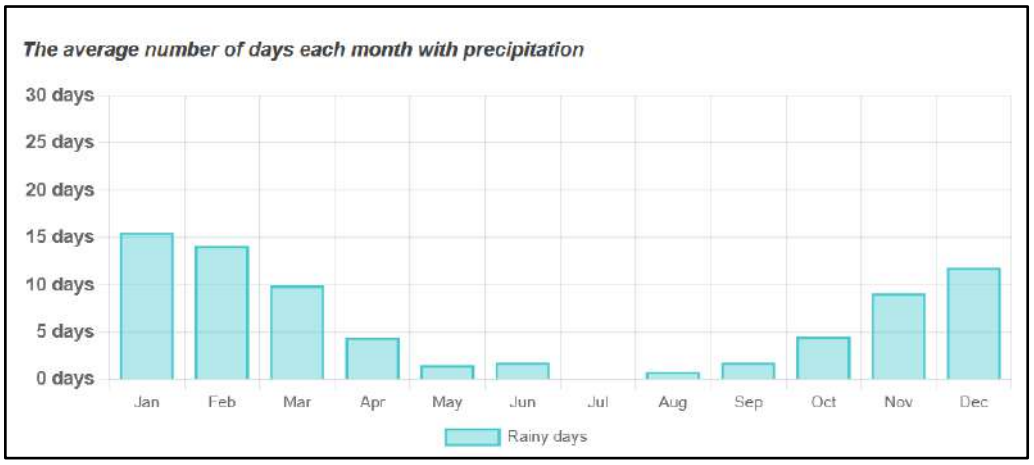

Figure 14: Average Number of Days with Precipitation (Weather Spark)

Challenges and or Potential Impacts:

There can be severe challenges associated with working a borrow pit during the rainy season. Without a dewatering system, a borrow pit acts as a natural basin, filling with rainwater and rendering the excavation zone completely inaccessible.

Accumulated water can mix with exposed soils, leading to heavily silted runoff. If this turbid water overflows or is pumped into nearby natural streams and drainage systems, it can cause severe environmental damage and result in regulatory fines. Unpaved haul roads, access ramps, and the pit floor turn into thick mud leading to heavy machinery (excavator, grader) getting stuck unable to work often with high repair costs.

5.4 National and Local Geology

The Oshikoto region and by extension the project site has an interesting geological history which is well documented. It has been reported that before the arrival of the Europeans in Namibia, the Owambo people bought malachite and copper 'concentrates' from the San Bushmen which smelted the ore into jewelleries and basic tools such as spears, arrowheads, axes and knives mostly for hunting and self-defence purposes.

The geology underlying the project site represents all three geological periods namely: Quaternary, Tertiary and Namibian erathem/age.

The Quaternary period is the current ongoing geological period dating back some 2.58 million up to the present time. It is characterised by repeated glacial cycles, the evolution and dominance of modern humans and the formation of landscapes. In Namibia this period is represented by the young surface sands of the Kalahari and Namib.

The Tertiary period dates between 66 and 2.58 million years and holds record of the early evolution of the Namib Desert and fossil layers commonly found in areas such as the Sperrigebiet in the //Karas region. The weathered dolomitic gravel extracted from the borrow pit would have been formed during this period.

The Namibian Erathem/Age: In geological terms, the Namibian Erathem/Age is a regional stratigraphic term covering rocks laid down during the late Neoproterozoic era, roughly 900 and 570 million years ago. It covers the transition from the breakup of the supercontinent Rodinia to the early stages of the Gondwana assembly. In present day Namibia, this period would include the Nama Group and the Damara Sequence represented in the project by the Mulden and Otavi Groups.

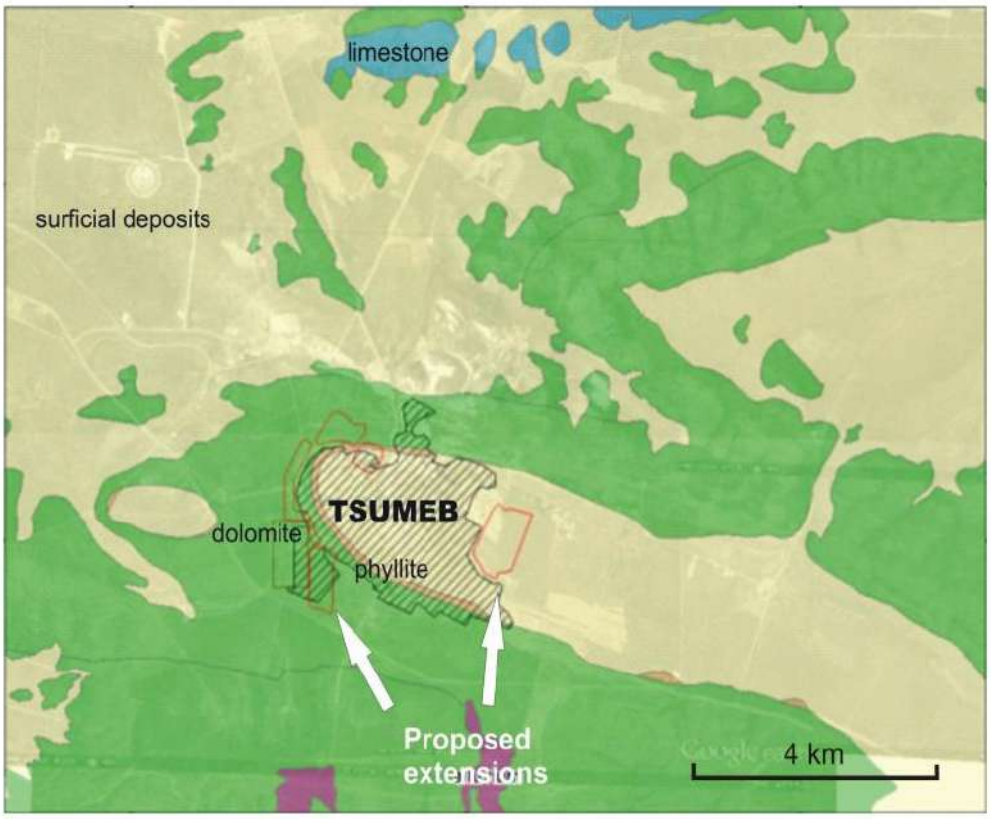

Figure 15: Tsumeb Geology and surrounding areas overlain on Google Earth Image (I Hasheela, GSN)

5.5 Sources of Surface and Groundwater

According to the Groundwater in Namibia, an explanation to the Hydrogeological Map, G Christelis, el 2011, the project is located within the Hydrogeological Framework of Otavi Mountain Land. As per the classification of the Department of Water Affairs, the project site lies within the Tsumeb-Otavi-Grootfontein Subterranean Water Control Area, Government Notice 1969 of 13 November 1970 and Proclamation 278 of 31 December 1976 (Extension).

Groundwater usage in this area is regulated by government, more specifically the Department of Water Affairs. All irrigation activities are required to obtain water abstraction permits indicating the volume of water that can be drawn per each rainy season. Groundwater quality in the project area is mostly of a calcium-magnesium-bicarbonate water type which suggests the water is recently recharged – indication of an aquifer that is typical of a dolomitic hard rock formation host where rapid groundwater recharge takes place.

As regards surface water, a rainwater pond was observed at the lowest elevation of the borrow pit, which could either mean that the water table is shallow or the floor of the borrow pit has a poor surface infiltration.

Challenges and or Potential Impacts:
Groundwater is utilised in the area for irrigation and other farming activities, and such users would be at risk if pollution of the groundwater takes place. Leakages of contaminants or hydrocarbons from fuel storage and machinery or vehicles on borrow pit may pose a risk of contamination of the groundwater resource.

5.6 Water Supply to Tsumeb Municipality

The Tsumeb Municipality sources its water exclusively from boreholes grouped in three areas – Extension 8, Extenstion 6 & 7 and Nomtsoub. The highest yields are obtained from Nomtsoub Group. All the boreholes of Tsumeb Municipality are outside and far away from the project area.

Challenges and or Potential Impacts:
Gravel extraction activities are located outside and far away from the Municipality's boreholes and as such no potential impacts are foreseen.

5.7 Fauna and Flora

Based on Atlas Namibia, the project site falls within the Savanna Biome with a Karstveld vegetation and Woodland structure. In generally, the biodiversity pattern in Namibia is influenced by high endemism (native and restricted to a specific geographical location) but lower species richness in the arid western escarpment and northwest, whereas the higher-rainfall northeast exhibits high species richness but low levels of endemism.

Plant and animal diversity on the surrounding farms (south, east and west) would thus be expected to be relatively high in undisturbed areas, but with low endemism.

In **Table 4**, is presented some of the plant diversity in the area such as *Colophospermum mopane, Terminalia prunioides, Commiphora* species*, Combretum Apiculatum, Acacia Reficiens, Dichrostachys Cinerea* and a variety of other trees are characteristic of this vegetation type.

Table 4: Plant Species in the Broader Area

Biomes	Savanna
Vegetation type	Kastveld
Vegetation structure type	Woodland
Diversity of higher plants	High
Number of plant species	400 – 500
% tree cover (%)	11 – 25
Tree height (m)	2 - 5
% shrub cover (%)	51-75
Shrub height (m)	1-2
% dwarf shrub cover	2 -10
Dwarf shrub height (m)	< 0.5
Dominant plant species	*Colophospermum mopane; Terminalia prunioides; Commiphora* spp*; Combretum apiculatum; Acacia reficiens; Dichrostachys cinerea*

The faunal diversity that can be expected in the project area is presented in **Table 5**.

Table 5: Faunal Species in the Broader Project Area

Faunal Name	**Species**
Mammal diversity	76-90 species
Rodent diversity	24 – 27 species
Bird diversity	201-230 species
Reptile Diversity	71-80 species

Faunal Name	Species
Snake Diversity	35-39 Species
Lizard Diversity	28-31 Species
Frog Diversity	12-15 Species
Termite Diversity	7 – 9 Species
Scorpion Diversity	10-11 Species

Trees with Conservation Status

Trees with conservation status that occur within the Oshikoto region and with a possibility to be encountered on the project site are listed below. Such tree species are protected by the Forestry Act which is enforced by the Forestry Department in MEFT. A permit has to be obtained prior to removal of any tree listed below:

- Camel-thorm (Acacia erioloba)
- Buffalo –thorn (Ziziphus mucronata)
- Bird Plum (Berchemia discolour)
- Shepherd's Tree (Boscia albitrunca)
- Namib Coral-tree (Erythrina decora)
- Windhoek Aloe (Aloe littoralis)
- Leadwood (Combretum imerbe)
- Namaqua Rock-Fig (Ficus corda subspcordata)
- Ringwood Tree (Maerua schinzii)
- Makalani Palm (hyphaene petersiana)
- Bottle Tree (Pachypodium lealii)
- Marula (Sclerocarya birrea)
- Tamboti (Spirostachys Africana)

Challenges and or Potential Impacts:
Although the 40-year-old borrow pit was completely cleared of vegetation, strong plant recovery was observed in the older, rehabilitated sections. However, invasive species are more prominent.

Activities at the borrow pit (i.e., noise, dust, and vibration) may disturb wildlife on the farmland and adjacent properties. Normally, affected species will temporarily relocate, and return to their habitats after the disruption ends.

5.8 Cultural and Heritage Resources

Key cultural and heritage sites include the Helvi Mpingana Kondombolo Cultural Village, the Tsumeb Museum, and the historically significant Lake Otjikoto
Helvi Mpingana Kondombolo Cultural Village: is Located on the southern outskirts of the town. It is an open-air museum that showcases the traditional rural lifestyles, homesteads, and heritage of Namibia's various ethnic communities through guided tours and craft exhibits

Tsumeb Meseum: Housed in an old German mining office,the Tsumeb Meseum explores Tsumeb's rich mining heritage, indigenous artifacts, and military weaponry salvaged from Lake Otjikot

Otjikoto Lake: Situated about 14 km from the project site, this striking sinkhole is a declared National Monument. It is deeply tied to regional colonial history, as the German colonial forces dumped their artillery here during World War.

Challenges and or Potential Impacts:
Excavation in the borrow pit especially when opening up virgin land has the potential to uncover items of heritage and cultural nature which must be protected as provided for in National Heritage Act. Management measures including the 'chance find' method are provided in the EMP.

5.9 Socio-economic Environment

The project site falls within the Oshikoto Region which, according to the 2023 national population census, had a population of 257,302 - representing about 8.5% of the total Namibian population of 3,022,401. The demographic characteristics of the region is tabulated in **Table 6**.

Table 6: Demographic of Oshikoto Region

Aspects	Male	Female	Total
Population (Whole Namibia: 3 022 401)	127 374	129 928	257 302
Rural population @ 81.6%			210 000
Urban population @18.4%			47 302
Labour force 15 years and above			
In labour force @ 35.4%			91 085
Employed @ 61.6%			56 108
Unemployed @38.4%			34 977
Outside labour force @ 64.6%			166 217
Age composition			
0 to 14 years old @ 39.5			101 634
15 to 64 years old @ 54.8%			141 001
65 plus @ 5.6%			14 409
Tsumeb Constituency			
Tsumeb population	19 512	18 622	38 134
Labour force 15 years and above			
In labour force @ 55.3%			21 088
Employed @ 63.3%			13 285
Unemployed @ 36.6%			7 718
Outside labour force @ 44.2%			16 855

The operation would be classified as mining and quarrying which is one of core economic sectors in the region of Oshikoto with significant numbers of employees as indicated during the Housing and Population Census of 2023.

Challenges and or Potential Impacts:
Unemployment and poverty in the region is relatively high. Current operations plays a significant role in providing employment to people from the area. Operations further contribute to sustaining the construction industry which provides employment to thousands of people.

6. PUBLIC CONSULTATION PROCESS

6.1 Introduction

Public Participation Process (PPP) is an integral part of the EIA process as outlined in Section of 27(1) (h) of the Environmental Management Act and Section 32 of Environmental Impact Assessment Regulations. One of the objectives of the Environmental Scoping Assessment is to identify possible stakeholders – those persons or institutions who may be impacted in one way or another by the project so as to involve such persons in the EIA process.

Generally, PPP serves as a platform through which stakeholders – both statutory and Interested or Affected Parties (I&APs) are provided an opportunity to participate in the EIA process. Through PPP, stakeholders are provided with information on the proposed project, and at the same time, invited to express their views, comments and or to voice any concerns which they might have with respect to the proposed development.

6.2 Objectives

Amongst the objectives of the PPP are to:

- Identify and register stakeholders, both statutory and interested and affected parties (I&APs) for the EIA being conducted.
- Share information on the project including potential environmental impacts – perceived and real.
- Ensure that the concerns of stakeholders are documented and considered by the competent authorities when considering the ECC application.
- Consider and incorporate inputs and or comments from stakeholders in the formulation of mitigation measures in EMP.
- Help increase awareness and public confidence, and in so doing to maximize the benefits and minimise associated risks.
- Secure the approval of the host communities which gives some form of assurance and a sense of partnership, hence avoiding unnecessary disputes and delays.
- Ensure transparence and accountability in decision-making, hence less conflict, since decisions are deemed to have been made through consensus.
- Ensure compliance with national legislations and or local council bylaws where applicable.

6.3 Legal Compliance

The PPP for this EIA was conducted in compliance with applicable sections of the EIA regulations viz. sections 21 to 24 which provide for, amongst others:

- Identification of the relevant stakeholders representing diverse sectors of the community/public who may be impacted by or intersected in the proposed project.
- Preparation of a concise Background Information Document (BID) on the project and circulating such BID through multiple channels (newspaper adverts, site notices at the project site & LTC office, social media, etc.). The BID prepared for this project is attached in **Appendix A.**
- Direct consultation with statutory stakeholders including the OEC which screened the project and designated an application number of **APP007393.**
- Broadcasting or dissemination of project information through multiple channels, including the background information document (BID).

6.4 Approach to the PPP

An investigative approach was adopted for this project bearing in mind that the borrow pit has been in existence for over 40 years and therefore known by the neighbouring property. Another important consideration was the fact that the borrow pit is on a commercial farmland owned by the applicant, viz. RD37.

6.5 Project Announcement

The EIA was announced in the following manner:

6.5.1 NEWSPAPER ADVERTS

The EIA was announced in the local newspapers on the dates as shown in the **Table 7** in line with the provisions of EMA. Newspaper tear sheets are attached in **Appendix C.**

Table 7: Newspapers Adverts

Date	Publication	Distribution	Language	Publication Rate
8 to 14 May 2026	Confidante	Nationwide	English	Weekly, Fri-Thu
15 to 21 May 2026	Confidante	Nationwide	English	Weekly, Fri-Thu
8 May 2026	Windhoek Observer	Nationwide	English	Daily, Mon to Fri
15 May 2026	Windhoek Observer	Nationwide	English	Daily, Mon to Fri

6.5.2 SITE NOTICES

Since there is only one access point to the borrow pit, an EIA site notice was placed at the single entrance gate to the borrow pit, just off the B1 highway. Placing the site notice anywhere else would serve no purpose. Another site notice was also pinned on the notice board at the office of TM. Proof of site notices is presented in Figures: 16 and 17.

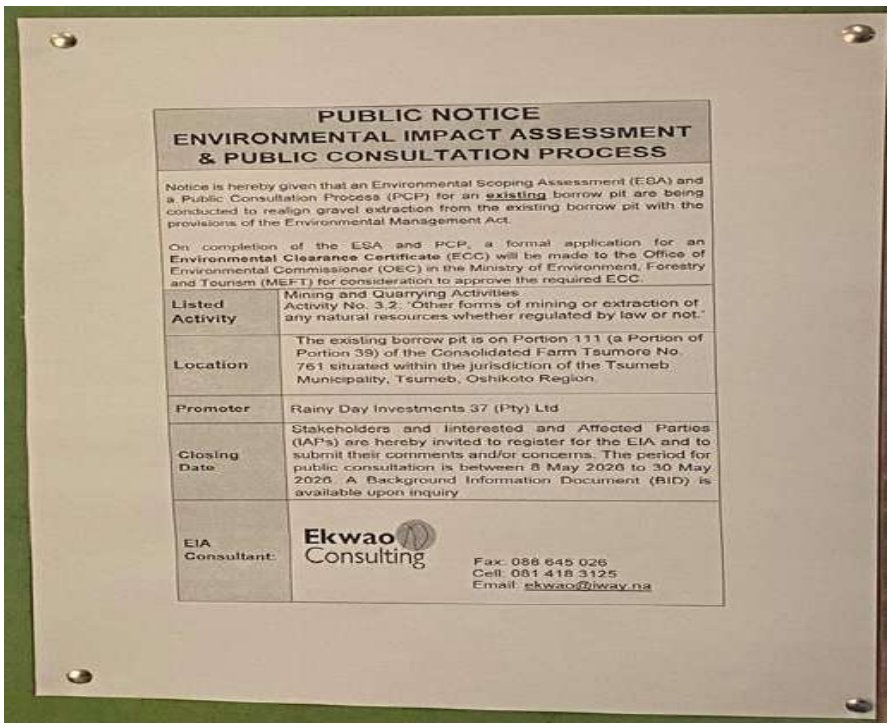

Figure 16: EIA Notice on the Notice Board of Tsumeb Municipality

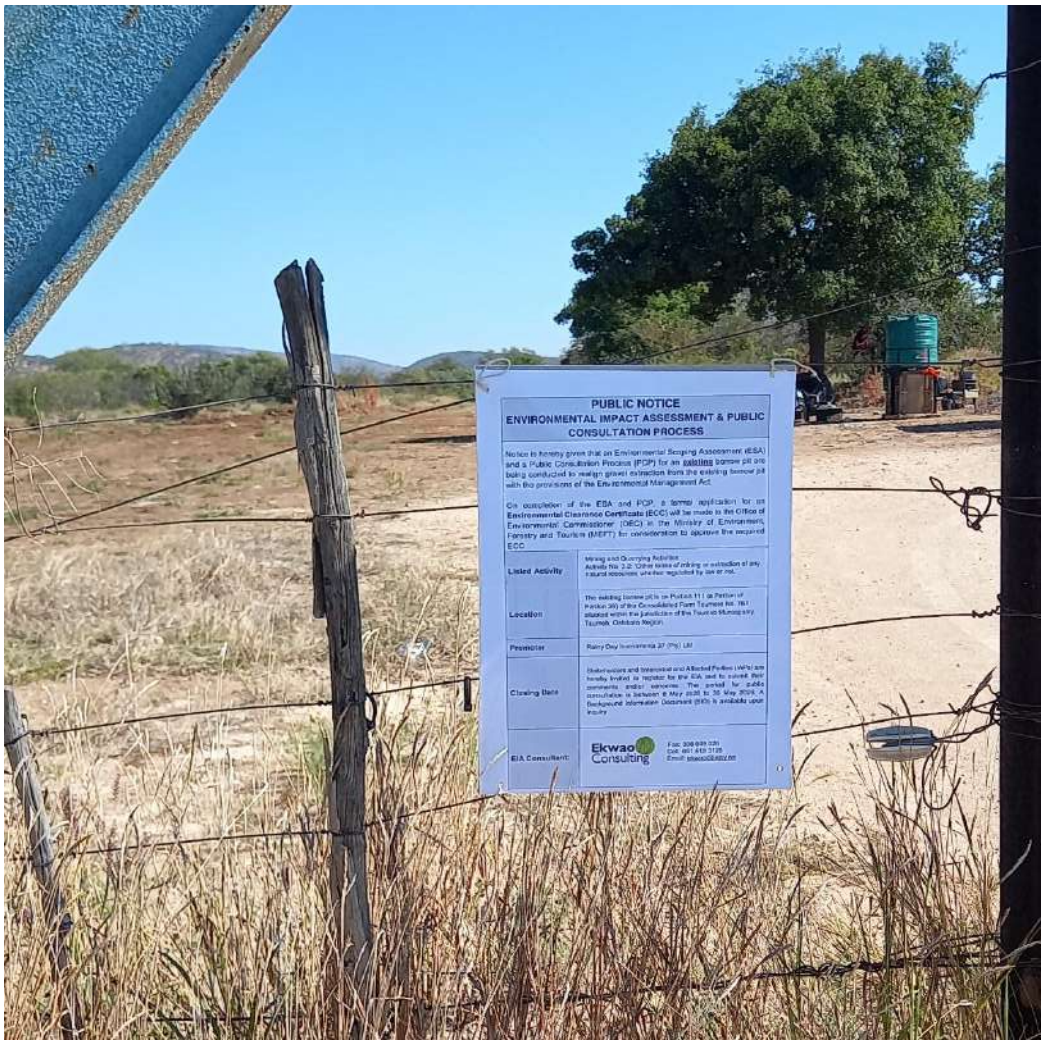

Figure 17: Site Notice at the Single Entrance Gate to the Borrow Pit

6.5.3 SOCIAL MEDIA

The BID on the project as mentioned above, and attached in **Appendix A,** was prepared and circulated via social media platforms to statutory stakeholders and I&APs.

6.6 Notifications

It is a requirement of the EIA regulations that notification letters be given to these stakeholders:

6.6.1 LOCAL AUTHORITY

The Tsumeb Municipality was notified of the EIA being conducted via a formal letter dated 22 May 2026. Correspondences with stakeholders are attached in **Appendix B**.

6.6.2 NOTIFICATION OF NEIGHBOURS/ADJACENT LAND OWNERS

It is the requirement of the EIA regulations that the listed activity to be undertaken is communicated to the neighbouring residents/businesses of adjacent land. There are no properties or businesses within a 1 km radius of the borrow pit requiring notification. Furthermore, gravel extraction has occurred at this site intermittently for over 40 years, establishing a long-standing historical use.

6.6.3 IDENTIFICATION OF OTHER STATUTORY STAKEHOLDERS

Listed in **Table 8** below, are the names of public officials representing Organs of State who have a direct bearing to the listed activity being assessed.

Table 8: Statutory Stakeholders

Names	Organisation	Role	Remarks
Hon H T Hamunyela	Tsumeb Municipality	Mayor of Lüderitz	
Mr Frans Enkali	Tsumeb Municipality	Chief Executive Officer	BID
Hon. Matheus Hangula	Oshikoto Regional Council	Tsumeb Constituency Councillor	
Hon. Sakeus Nangula	Oshikoto Regional Council	Chairman of Management Council	
Hon. Sacky Kathindi	Oshikoto Regional Council	Governor	
Mr T Mufeti	MEFT	Environmental Commissioner	
Dr C !Garus-Oas	MEFT	Deputy Environmental Commissioner	
Ms S Angula	MEFT	Deputy Director	
Mr D Nchindo	MEFT	Chief Environmental Officer	BID
Mr H Mbura	MEFT	Chief Environmental Officer	
Hon Inge Zaamwani	MAWFLR	Minister	
Hon Ruthy Masake	MAWFLR	Deputy Minister	
Mr. Alfred Sikopo	MAWFLR	Executive Director (Agriculture & Land Reform)	

BIDs were only made available to the official as indicated in the Table 8 above, either by emails or through social media platforms.

6.6.4 PUBLIC MEETINGS

The newspaper adverts and site notices placed at various conspicuous areas yielded no response from any member of the public, i.e. no single stakeholder or IAP asked to be registered for the EIA. Therefore no meeting was held.

6.6.5 COMMENTS AND RESPONSE

Throughout the entire EIA process, stakeholders were provided with ample opportunities to submit comments, raise issues, and to make recommendations. Such comments or raised would have been presented in the 'Comments and Response' section of the report. Up to date of this report, no comments have been received from anyone.

7. IDENTIFIED AND PREDICTED IMPACTS

The potential environmental issues/impacts identified during the scoping assessment process, which will be investigated and assessed are listed in **Table 9**:

Table 9: Potential Impacts (Identified, Predicted & Perceived)

Environmental Aspects	Pre-mining (pre-gravel extraction) Environmental Impacts (Real, Perceived, Predicted, etc.)
Land Use	• Loss of land used for agriculture and game farming within the borrow pit area. • Fragmentation of farm/farm portions due to access and haul road construction. • Disturbances to livestock and wildlife on the farmland
Geology and Geohydrology	• Excavation of gravel materials and associated impacts (borrow [it, haul road, etc.) • Disposal of overburden/spoil material. • Unsuitable geological conditions. • Removal of required material within the borrow area. • Potential disturbance of the aquifer resulting from gravel extractions. • Potential contamination of groundwater during the site clearing and mining stage. • Possible influence to groundwater flow as a result of excavations at borrow pit. • Contamination of groundwater from poor stormwater management, spills and leaks of hazardous chemical substances during operation of borrow area.
Soil Disturbances	• Soil erosion (e.g. steep terrain and instream works). • Soil contamination through poor mining practices and inadequate management of hazardous products, i.e. fuel, oil, etc.
Surface and Groundwater Sources	• Alteration of surface water flow regime at borrow pit and access road crossings. • Impeding and or diverting surface water flow of the affected dry river at borrow pit and access road crossings. • Poor management and maintenance of the potable chemical toilet at borrow pit leading to leaking, etc. • Poor management of hazardous products at the borrow pit, i.e. leaks and spills not cleaned up.
Ambient Air Quality	• Increased gaseous emissions from poor maintained machines and equipment • Fugitive dust escaping into the atmosphere around the borrow pit • Heavy excavator dislodging and lifting gravel materials release immediate clouds of dust.
Terrestrial Ecology – Flora	• Vegetation permanently lost in borrow area as a result of gravel extraction activities. • The potential loss of significant flora species may occur. • Clearing of vegetation for construction of haul roads and for the use of the borrow pit may result in the proliferation of exotic vegetation, which could spread beyond the borrow pit domain. • Soil erosion on steep gradients and from runoff from access/haul roads; • Potential contamination of soil • Chopping down mature trees for purposes of firewood harvesting.
Terrestrial Ecology – Flora	• Ecosystem disruption may occur where clearing of project footprint is undertaken to allow for gravel extraction.

	• Fauna could be adversely affected through mining-related activities (noise, dust, illegal poaching, and habitat loss). This is especially relevant to sensitive game species. • Fencing of the borrow area, and access roads will minimise animal movement on the property. • Potential danger of livestock /wildlife falling into the borrow pit causing injuring to themselves
Traffic on the Section of B1 Highway	• Risk of damaging public roads, i.e. gravel spill on the highway (B1) may pose serious risk danger to motorists using the national road. • Disruptions to traffic on local road networks (B1 highway) – tipper truck operators not complying with traffic regulations at the road intersections, etc. • Increase in traffic on the local road networks.
Cultural and Heritage Resources	• Risk of heritage and cultural resources being damaged / destroyed through mining activities. • Borrow excavation scars, noise and dust from operations may disrupt the aesthetic, social and spiritual values of the natural landscape.
Waste Generation and Handling	• Waste generated from site preparations (e.g. plant material). • Domestic waste. • Hazardous waste (e.g. chemicals, oils, soil contaminated by spillages, diesel rags). • Disposal of excess spoil material (soil and rock) generated as part of the gravel extraction.
Socio-economic environment	• Temporary loss of commercial and agricultural land through clearance of mining areas. • Temporary loss of agricultural production. • Risk to wildlife and livestock as a result of mining related hazards. • Loss of income in eco-tourism sector (hunting and game farming) due to visual impact, noise and dust. • Potential damage to property (e.g. gates, fences, structures). • Impact to visual quality and sense of place of direct and adjacent property owners. • Nuisance from dust and noise. • Possible influx of people seeking employment and associated impacts (e.g. foreign workforce, cultural conflicts, squatting, demographic changes, anti-social behaviour, etc.
Aesthetics	• Visual quality and sense of place may be adversely affected by mining activities. • Noise and dust generated from gravel extraction affecting households/infrastructure in close proximity to borrow areas. • Inadequate reinstatement and rehabilitation of borrow pit footprint

8. IMPACT ASSESSMENT METHODOLOGY

Potential impacts that are likely to occur as a result of the various stages of implementing the gravel extraction project, i.e. planning stage/phase and construction (mining the gravel) are assessed using the methodology presented in this section.

8.1 Types of Impacts

Impacts can be positive, negative, direct, indirect and or cumulative. Direct impacts are those that are caused directly by the activity and generally occur at the same time, and at the place of the activity. Such impacts are usually associated with the operation and maintenance of a development or activity, and are therefore conspicuous evident and quantifiable.

On the other hand, indirect impacts are induced changes that may occur as a result of the activity or development. Cumulative impacts can occur from the collective impacts of individual minor actions over a period of time and can include both direct and indirect impacts.

8.2 Evaluation and Assessment of Impacts

Impacts are assessed in terms of their nature, extent, duration, and significance of the consequences for or impacts on the environment. The methodology used in determining the significance of actual and/or perceived environmental impacts is also outlined below. (**Table 10**).

The significant rating for assessed impacts is presented in **Table 11**.

Table 10: Points Assigned to Potential Impacts

Severity			Occurrence
Magnitude of Severity of Impact Magnitude (M)	**Duration of Impact Duration (D)**	**Extent of Impact Scale (S)**	**Probability of Occurrence Probability (P)**
10 = Very high /Don't know	5 = Permanent	5 = International	5 = Definite / Don't know
8 = High	4 = Long term (Impact ceases after closure of activity)	4 = National	4 = High Probability
6 = Moderate	3 = Medium term (5 to 15 years)	3 = Regional	3 = Medium Probability
4 = Low	2 = Short term (2 to 5 years)	2 = Local	2 = Low Probability
2 = Minor	1 = Transient	1 = Site specific	1 = Improbable
1 = None /Non-significant			

After ranking these criteria for each impact, a significance rating was calculated using the following formula:

Magnitude:

=

Average of (Severity, Duration, Extent, Value of Affected Component and Risk to the human population)

SP (Significant Points)

=

Magnitude x Probability

Table 11: Impact Significance Rating

Value	Significance	Comment
SP > 75	Indicates Severe Environmental Significance	An impact that could influence the decision about whether or not to proceed with the project regardless of any possible mitigation.
SP 60 - 75	Indicates Major Environmental Significance	Where an accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued/sensitive resource/receptors. Impacts of high significance would typically influence the decision to proceed with the project unless it is mitigated.
SP 30 - 60	Indicates Moderate Environmental Significance	Where an effect will be experienced, but the impact magnitude is sufficiently small and well within accepted standards, and the receptor is of low sensitivity/value. Such an impact is unlikely to influence the decision. Impacts may justify significant modification of the project design or alternative mitigation
SP < 30	Indicates Low Environmental Significance	Where an effect will be experienced, but the impact magnitude is small and is within accepted standards, and the receptor is of low sensitivity/value, or the probability of impact is extremely low. Such an impact is unlikely to influence the decision, although impact should still be reduced as low as possible, particularly when approaching moderate significance.
SP < 4	Indicates negligible environmental significance	A resource or receptor will not be affected in any material way by a particular activity, or the predicted effect is deemed imperceptible or indistinguishable from natural background levels. No mitigation is required.
+ve	Positive	Where positive consequences / effects are likely.

8.3 Assessment of Impacts

The following comments are provided with respect to assessment of impacts:

8.3.1 PLANNING STAGE

Whilst gravel extraction has been ongoing from the same borrow pit for over 40 years, planning is still applicable as it entails mostly aspects related to compliances, i.e. obtaining the ECC and therefore realigning the operation with applicable legislations. Other aspects related to the planning phase include geotechnical assessment to ascertain the gravel volumes, suitable areas where to stockpile topsoil for rehabilitation, stormwater management, slope profiling, etc.

It is also important for the promotor to obtain permission from Road Authority to install suitable traffic signage along the section of the B1 highway to warn road users of construction vehicles entering and exiting the highway, i.e. speed limit and stop signs at the intersection. Borrow pit rehabilitation should also be planned and executed in those sections of the borrow pit where gravel has been extracted.

No impacts are expected during the planning stage. However, neglect to install traffic signage may lead to accidents and or incidents.

Environmental Objectives

- Ensure that all necessary permits /licenses are obtained from various government agencies and local authority (where applicable) and kept safe on file.
- Ensure all appointed third parties (contractors and their employees) are given an induction on the EMP.
- Make provisions to have a Health, Safety and Environmental Coordinator to implement the EMP and oversee occupational health and safety as well as general environmental related compliance at the site, local authority ministries, local authorities and any other bodies that governs the construction (maintenance) activities and operations of the facility
- Establish and / or maintain a reporting system to report on aspects of gravel extraction operations and rehabilitation as outlined in the EMP.

- Submit monitoring reports every six months to allow for future environmental clearance certificate renewal application.
- Appoint an environmental consultant to update the EMP and apply for renewal of the environmental clearance certificate prior to expiry.
- Report any accidents and incidents that occur on the borrow pit

8.3.2 LAND USE

It is predicted that borrow pit excavation will temporarily alter localized land use. However, the spatial scale of this impact is restricted to the immediate project footprint. Observations of rehabilitated sections of the borrow pit are that successful vegetative regrowth had occurred, suggesting that the long-term impacts on land use are low and reversible.

Mitigation would require a well-planned extraction plan combined with topsoil conservation and progressive site rehabilitation. The assessment with respect to land use is presented in the table below.

Potential Impact - Some alteration to the land use												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Fauna, flora and aesthetics	6	3	2	3	33	Moderate	6	3	2	2	22	Low

Environmental Objective(s)

- Rehabilitation of the borrow pit is progressively carried out with topsoil replaced such that the land's productiveness is restored and retained.
- Comply with the EMP.

8.3.3 GEOLOGY AND GEOHYDROLOGY

Good knowledge of the local geology is critical and will eliminate environmental impacts associated with mining operation in any borrow pit. The quality of the gravel materials being extracted is, to a large extent, determined by geological formation which includes the ratio of gravel, sand and fines.

Understanding the hydrology around the project area is also critical when excavating gravel from the borrow pit because it dictates the stability of the slopes involved and the risk of flooding. Gravel is highly permeable. Excavating below the water table, may result in water filling up the pit, making extraction extremely difficult.

A geotechnical assessment which ascertains the in-situ gravel resource should be used as a guideline to plan extraction areas, taking into account exposed geological information. Knowing whether massive boulders will be encountered or just fine aggregate will dictate the type of machinery needed in the operation.

It is also important to know the level of the water table because excavating too deep into sedimentary rocks may pierce the aquifer resulting in the flooding of the borrow pit.

Potential Impact(s) – Borrow pit flooding, slope failure, contamination of water table												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Water, geology	4	2	2	3	24	Low	4	2	2	2	16	Low

Environmental Objectives

- Ensure that gravel extraction is confined to areas that are geotechnically assessed and approved.
- Comply with the EMP.

8.3.4 SOIL DISTURBANCE

It has been assumed that gravel extraction from the borrow pit will cause localized soil disruption. Primary impacts could include severe erosion, soil compaction from heavy machinery, loss of topsoil and heightened risks of sediment runoff and even landslides.

Stripping the land of vegetation exposes soil to wind and rain. Discharging of any water containing polluting matter or visible suspended materials and sediments directly into drainage lines is not allowed as it leads to soil pollution.

The assessment is provided in the table below.

Potential Impact(s) – soil compaction, soil erosion, loss of soil fertility												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Soil, water	6	3	2	4	44	Moderate	6	3	2	2	22	Low

Environmental Objectives

- Limit soil disturbances by confining gravel extraction to well-planned an demarcated sections
- Comply with the EMP.

8.3.5 SURFACE WATER AND GROUNDWATER

Mining can alter local hydrology – disrupting natural drainage often causing severe sedimentation, and degrading water quality through runoff contamination. When borrow pits excavate deep enough to expose the water table, they tend to create artificial ponds or depressions. Without proper water circulation, these bodies of water often become stagnant, leading to low dissolved oxygen levels, algal blooms, and poor overall water quality.

Stormwater runoff carries heavy sediment loads into nearby streams and rivers, which increases water cloudiness (turbidity) and harms aquatic life. Open excavations will increase the permeability of the soil making it easier for pollutants - such as fuels, machinery oils, pesticides, and localized runoff to seep directly into the underlying aquifer impacting the water quality.

Failing to contain large spills of hydrocarbon may result in direct contamination of groundwater via the borrow pit, if the correct safety procedures are not in place. A borrow pit abandoned without rehabilitation can become a breeding ground for disease or permanent pollution sinks.

Potential Impact(s) – Contamination of surface and groundwater sources from operational activities refuelling, poor waste handling, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Water	6	2	2	3	30	Moderate	4	2	2	3	24	Low

Environmental Objectives

- Enhance amenity values and prevent potential contamination of water sources.
- Comply with the EMP.

8.3.6 AMBIENT AIR QUALITY

The machineries that will be used in the operation are powered by diesel engines - burning of the diesel creates gasses (carbon monoxide (CO), carbon dioxide (CO_2), sulphur dioxide (SO_2), nitrogen oxides (NOx), volatile organic compounds and hydrocarbons. These are known pollutant elements, some of which are greenhouse gasses and are released into the atmosphere. The operation is however considered to be of a small scale and therefore have a low contribution to the overall ambient air quality in the area. The borrow pit is also close to the B1 highway which is used by many vehicles on a daily basis.

The assessment is provided in the table below:

Potential Impact(s) – Gaseous emissions, release of harmful particulate matters into the atmosphere, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Air	4	2	2	3	24	Low	4	2	2	2	16	Low

Environmental Objective

- Protect amenity values by striving to prevent health impacts and to minimise gaseous emissions including dust.
- Comply with the EMP

8.3.7 TERRESTRIAL ECOLOGY – FLORA

It is predicated that gravel extraction from the borrow pit will cause impacts on flora, ranging from immediate habitat destruction to long term ecological changes. The removal of topsoil and vegetation directly eliminates native plants, endemic species, and critical root systems within the excavation footprint. Heavy machinery compacts surrounding soils, destroying soil structure and reducing water infiltration. This restricts root growth and makes it difficult for native seeds to germinate.

Altering the natural landscape and removing vegetation has the potential to disrupt surface drainage. Borrow pits can either cause waterlogging and drown local vegetation or drain surrounding areas, leading to water stress for adjacent flora. These impacts are expected to be localised, of a short duration and partially reversible.

The assessment is provide below.

Potential Impact(s) – Habitat destruction, soil compaction reducing root penetration, invasion of alien evasive species												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Flora, Soil	4	2	2	4	32	Moderate	4	2	2	3	24	Low

Environmental Objectives

- Limit destruction of vegetation including plants and trees with conservation status.
- Comply with the EMP.

8.3.8 TERRESTRIAL ECOLOGY – FAUNA

Faunal species is directly impacted by gravel mining from borrow pits through habitat loss during plant and vegetation clearing. Mortality of burrowing animals may also occur from heavy machinery, while some animals may be caused to flee as a result of machine noise and dust.

Indirectly, abandoned borrow pits can create hazardous physical traps for wildlife with stagnant water, acting as breeding grounds for vectors like mosquitoes. The impact will be localised and of a short duration.

The assessment is provided below.

Potential Impact(s) – Faunal habitat destruction, mortality of burrowing animals, road kills, poaching, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Fauna	4	2	2	3	24	Moderate	4	2	2	2	16	Low

Environmental Objectives

- Protect and safeguard faunal species throughout the operational lifespan of the borrow pit.
- Comply with mitigation measures in the EMP.

8.3.9 HEALTH, SAFETY AND SECURITY

Gravel extraction is performed by humans who are exposed to health and safety risks. Machine operation and handling of the materials, pose risks as employees remain exposed to elevated levels of dust and noise. In addition, refuelling of heavy earthmoving machinery on site involves handling hazardous products which pose safety risks to employees.

Security risks are also related to unauthorized entry, theft and even sabotage. Unprotected and unsafe handling of fuel exposes employees to danger. Dust from the site is not considered to pose a health or safety risk to surrounding communities because the gravel is mostly damp. Emissions released by construction machinery may however contribute to the air quality of the site.

The assessment of health, safety and security is presented below.

Potential Impact(s) – Occupational injuries, ill-health, accidents, fire, theft, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Health	4	2	2	4	32	Moderate	4	2	2	3	24	Low

Environmental Objectives

- Prevent injuries, health impacts and theft
- Comply with the EMP

8.3.10 TRAFFIC IMPACTS ON PUBLIC ROAD NETWORK

It is assumed that an increase in traffic around the borrow pit site may be experienced as a result of tipper trucks hauling G7 materials from the borrow pit to OBPP site. It is also possible that overloading of tipper trucks may result in spill of gravel materials, falling onto B1 causing risks to motorists using the national road. This risk is amplified by lack of traffic signs at the intersection of the access road and B 1 – to warn

motorists approaching the intersection of construction vehicles entering and existing the B1 from the borrow pit.

Potential Impact(s) – Road Incidents, Road Accidents, Injuries, Damage to properties, increased road wear and tear, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Roads	6	4	2	4	48	Moderate	6	4	2	3	36	Moderate

Environmental Objectives

- Ensure that minimum traffic impacts occur and that no transport related incidents and accidents occur.
- Erect clear road signage to warn B1 road users of construction vehicles entering or exiting the highway.
- Comply with the EMP.

8.3.11 Waste Generation and Handling

It has been predicted that waste at the gravel extraction site will be minimal and possibly limited to household waste (plastics, cans, bottles, etc.). Unsecured leftover food items can attract all kinds of scavengers to the site. All hazardous waste such as oily rags and waste oil must be collected from the site on the same day and disposed of in a responsible manner. Waste presents a contamination risk and when not properly handled and regularly removed may become a fire and/or health hazard. Waste from the chemical toilet must not be disposed of at the site.

Potential Impact(s): Visual nuisance (papers & plastics), health and safety hazardous, potential contamination of shallow water aquifer.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Soil, fauna, water	4	2	2	3	24	Low	4	2	2	2	16	Low

Environmental Objectives

- Ensure that a waste management plan for the operation is developed and implemented.
- Comply with the EMP.

8.3.12 Socio-economic Environment

It is anticipated that short term employment opportunities and business opportunities for the small local enterprises will occur during the operational phase of the project (gravel extraction). Therefore, there are both positive and negative impacts – positive for those persons who will get some employment, but the news of job opportunities could also lead to crowds of jobseekers gathering at the borrow pit site in the hope of getting hired.

Any recruitment that may be required should be done in line with the labour laws of Namibia. Employment should be offered on merit and without prejudice on the basis of race, gender or political affiliation. Hiring of non-Namibians for low skilled jobs is forbidden and acceptable justification must be provided to the authorities.

Potential Impact(s) : creation of employment, transfer of knowledge and skills												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Social	6	3	2	3	33	Moderate	6	3	2	4	44	Moderate

Environmental Objective

- Offer and provide employment opportunities in line with the labour laws of Namibia'
- Comply with the EMP.

8.3.13 CULTURAL AND HERITAGE RESOURCE

The assumption is that the town of Tsumeb and surrounds areas are endowed with cultural and heritage resources. It is there possible to stumble upon such heritage resources during excavations especially over virgin grounds. These measures are proposed:

- All people employed on site must be made aware of possible cultural and heritage important artefacts and what process to follow if these are found or suspected.
- A method statement must be written and included, but limited to training on chance find procedure.
- Follow the measures provided in the EMP.

Potential Impact(s) – Damage to cultural and heritage resources												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Cultural & heritage	4	2	2	3	24	Low	4	2	2	2	16	Low

Environmental Objectives

- Protect items of cultural and heritage resources whenever encountered during the gravel extraction operation.
- Comply with the EMP.

8.3.14 AESTHETICS

It is assumed that potential impacts could occur on three visual components briefly described here:

- Negative visual aesthetics due to alteration of site topography and general appearance.

It is assumed that motorists on the B1 highway will partially see the altered site topography, especially during winter when foliage thins causing causing physiological or psychological virtual distresses to sensitive receptors.

- Visual intrusion as a result of the movement of machinery in and out of the borrow pit.

It is assumed that visual intrusion will occur as a result of movements of construction machinery and vehicles in the borrow pit. However, the borrow pit is obscured and shielded by encroacher bush such that it is only partially visible from the B1 highway.

- Visual impacts caused by airborne dust clouds and dust pollution.

Airborne dust clouds caused by heavy machines and trucks are usually far more visible than the activities that cause them and can in windy conditions, be propagated over great distances. The scale is expected to be small and not cover a vast area.

Potential Impact(s) – negative visual aesthetic due to alteration of site topography, general appearance, movements of machines, dust clouds, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Visual	6	4	2	4	48	Moderate	6	4	2	2	22	Low

Environmental Objective(s)

- Strive to minimise aesthetic impacts associated with the gravel extraction from the borrow pit
- Comply with the EMP.

8.3.15 CUMULATIVE IMPACTS

Cumulative impacts are those potential impacts which in itself may not be considered insignificant, however when considered as a collective may be significant. Possible cumulative impacts associated with the operational phase include increased traffic in the area, on gravel access road, and potential groundwater contamination. Positive cumulative impacts include value addition and employment

Potential Impacts – Habitat loss, soil erosion, contamination of water sources, dust, noise, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Fauna, Flora, Soil, Visual	6	3	2	3	33	Moderate	6	3	2	2	22	Low

Environmental Objectives

- Minimise all negative cumulative impacts associated with the gravel extraction and enhance positive impacts.
- Comply with the mitigation measures in the EMP.

8.3.16 DECOMMISSIONING / REHABILITATION

The lifespan of the borrow pit is dependent on the gravel volume, the technology used to mine and financial sustainability of the operation. Other circumstances that may warrant decommissioning include withdrawal of an ECC, closure by government agencies, closure due to economic factors, court orders, civil unrest and or natural calamities. The proponent will be required to prepare and to submit a due diligence decommissioning report to MEFT for approval at least three (3) months in advance. The impact at this phase may include: job losses, creation of ecological vulnerable land, insecurity, safety and health risks as well as waste generation.

The assessment is provided in the table below.

Potential Impacts – job losses, health and safety risks, waste generation, ecological disturbance, etc.												
Aspects Affected	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WOM**	**Magnitude**	**Duration**	**Scale**	**Probability**	**Significance**	**Significance WM**
Fauna, Flora, Soil, Visual	6	2	2	3	30	Moderate	6	3	2	2	22	Low

Environmental Objectives

- Ensure that the process of rehabilitation and decommissioning is conducted in a coordinated manner and well supervised.
- Comply with the EMP.

9. EVALUATIONS

9.1 Environmental Economics Criteria

A final qualitative assessment is considered in terms of the criteria used in the field of Environmental Economics. These criteria are explained by Stauth (1983), namely:

- Efficiency Criterion,
- Equity Criterion, and
- Intergenerational Equity Criterion

9.1.1 EFFICIENCY CRITERION:

A project is considered to be efficient if it brings about a net benefit to society. If some people are made better off without anyone else being made worse off, then a project is considered efficient in environmental economics terms. This project is vital for Tsumeb's construction providing gravel of good quality. The project will further contribute to the national coffers through VAT and income tax payments. Tax payment to Central Government will benefit the country as a whole. Furthermore, employees will spend their disposal incomes in the local economy through payments for municipal services (water, electricity, rates & taxes, etc.), education for their children, etc. hence supporting and boasting the local economy.

9.1.2 EQUITY CRITERION

The equity criterion relates to the distribution of costs and benefits in the affected society. A project is equitable if it brings about a situation in which the distribution of social well-being is improved.

The gravel extraction production will benefit local people without disadvantaging them in any way. Some grazing will be lost where the gravel extraction blocks are sited, but the area involved is minimal and can be successfully rehabilitated. The distribution of benefits will be somewhat limited as direct benefits from the project will naturally accrue to its employees, to the land owner and to the broader society through creation of work opportunities in those sectors which will utilize the end products.

9.1.3 THE INTERGENERATIONAL EQUITY (OR SUSTAINABILITY) CRITERION

This criterion considers the economic impacts on future generations – i.e. it extends the considerations of equity to future generations. Thus a project should be able to make the present generation better off without making future generations worse off. It should be able to provide benefits to future generations without degrading the resource base that the society depends on for its wellbeing.

The gravel resource is relatively huge and can support the road building construction sector for many years into the future. The operation does not need the application of water and electricity which are in short supply in the national capital. Provided that the EMP is complied with, the project does not pose any significant threats to the environment, the human health, livestock and wildlife.

9.2 Conclusions and Recommendation

Overall the economic benefits of the gravel production facility proposed by RD37 outweigh the limited negative impacts on the natural environment.

The gravel resource is quite big and it gravel has been accepted by the market and considered good and strong. Supplying gravel materials from this borrow pit to OBPP will be the preferred option with the least environmental impacts than sourcing elsewhere in Tsumeb.

The gravel extraction operation will present low environmental impacts and, provided the recommendations proposed in the EMP are implemented, the negative impacts can be effectively mitigated. It is recommended that an ECC be granted to RD37.

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APP-007393

Appendix A

Background Information Document

ENVIRONMENTAL SCOPING ASSESSMENT

For an **Existing** Borrow Pit Located on Portion 111 (a Portion of Portion 39) of Consolidated Farm Tsumore No. 761 Situated within the Expanded Boundaries of the Tsumeb Town and Townlands, Tsumeb, Oshikoto Region

Background Information Document
(BID)

Mining and Quarrying of Gravel Materials for the Construction of Civil Infrastructure in the town of Tsumeb and Surroundings

April 2026

INTRODUCTION

Rainy Day Investments Thirty Seven (Pty) Ltd ('**RDI'** for short) is the proprietor of Portion 111 (a Portion of Portion 39) of the Consolidated Farm Tsumore No. 761 situated within the jurisdiction of the Tsumeb Municipality. Portion 111 was recently acquired by RDI, and includes an **existing** Borrow Pit on the property, which has been utilised intermittently for gravel extraction over several years.

In terms of the Environmental Management Act, an Environmental Clearance Certificate (ECC) is required to engage in the activity contemplated by RDI. The ECC is granted by the Environmental Commissioner (EC) in the Ministry of Environment, Forestry and Tourism (MEFT). Ekwao Consulting has been appointed by RDI to facilitate its ECC application with the OEC.

PROJECT LOCATION

Portion 111 is situated to the southwest of Tsumeb proper, abutting the B1 highway to its north and the railway line to the west as more or less depicted on the Google Earth Images presented in Figures 1 & 2. The property measures about 500 ha, and is zoned as a mixed land use village. The existing Borrow Pit on the property is accessed by means of an existing gravel road of approximately 700 m long extending from the B1 highway. The existing Borrow Pit occupies a footprint of about 2 ha and has gravel materials of good quality meeting industry standards and specifications.

NEED FOR THE PROJECT

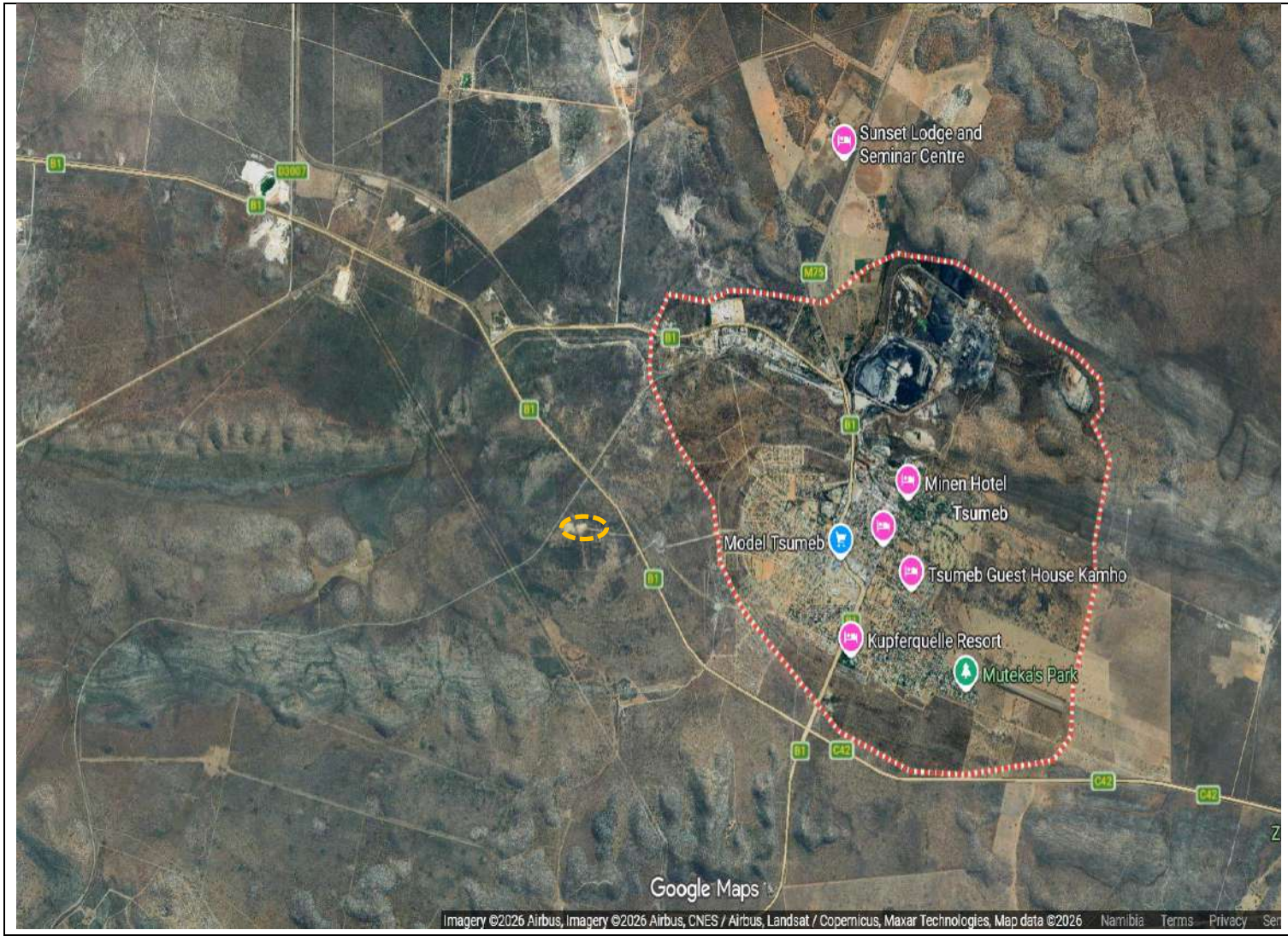
Nampower's 40 MW Otjikoto Biomass Power Station currently under construction near Tsumeb, requires huge volumes of gravel materials. RDI has been approached by the main contractor to supply gravel materials from their Borrow Pit because the third party originally subcontracted to supply gravel materials is overwhelmed and unable to meet the required volumes. The total distance from the Borrow Pit to the project site (biomass) is ±5 km – with ±4.3 km of that haulage length travelled on B1 highway.

BACKGROUND INFORMATION DOCUMENT (BID)

The purpose of this BID is to provide:

- an overview of the proposed activity to statutory stakeholders and Interested and Affected Parties (I&APs)
- an overview of the EIA process being conducted and to invite stakeholders and I&APs to register for, and to participate in the EIA study.
- Contact details on how you, as an I&AP can become involved in the EIA process, to raise any issues, concerns and or/or suggestions on the intend activities.

LISTED ACTIVITY	CONTACT DETAILS
MINING AND QUARRYING ACTIVITIES: **Activity No. 3.2:** 'Other forms of mining or extraction of any natural resources whether regulated by law or not.'	Kindly send comments and or input to: **Ekwao Consulting** P O Box 25021. Windhoek Cell: 081 127 3027 Fax: 08864 5026 Email: ekwao@iway.na Closing date for comments /input is: **30 May 2026**



LOCALITY MAP

Project Site – Tsumeb, Oshikoto Region

Legend:

Project Site

Prepared by:

Ekwao Consulting

Box 25021
Windhoek
Cell: 081 418 3125
Email: ekwao@iway.na

Date	April 2026
GPS Coord	-19.249567 S 17.671914 E

Tsumeb Town

Scale 1: 2,500

Figure 1: Project Location Map – Google Earth Image

Figure 2: Borrow Pits in Relation to B1 and Railway Line

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Appendix B

Notifications

Ekwao Consulting

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22 May 2026

The Chief Executive Officer
Tsumeb Municipality
Box 275
TSUMEB

Atten: Mr Frans Enkali

Email: edomingo@tsumebmun.org.na

NOTIFICATION IN TERMS OF SECTION 21 OF THE ENVIRONMENTAL IMPACT ASSESSMENT REGULATIONS

We write to inform your good office as follows:

1. Ekwao Consulting CC ('**Ekwao**') has been appointed by Rainy Day Investments Thirty Seven (Pty) Ltd ('**RDI**') to facilitate their application for an Environmental Clearance Certificate (ECC) with the Ministry of Environment, Forestry and Tourism (MEFT).
2. RDI owns Portion 111 (a Portion of Portion of 39) of Consolidated Farm Tsumore No.761 situated within the expanded boundaries of the Tsumeb Municipality. There is an **existing** Borrow Pit on the said property with good gravel materials which RDI plans to exploit.
3. In terms of the Environmental Management Act (**EMA**), and Environmental Impact Assessment (EIA) regulations, RDI is required to obtain an Environmental Clearance Certificate (ECC) permitting gravel extraction.
4. In terms of EMA, Ekwao as EIA Consultants are required to formally notify the local authority, i.e. Tsumeb Municipality of the EIA being conducted.
5. Attached hereto, please find the Background Information Document (BID) submitted to MEFT providing an overview of the proposed activity, and the **Screening Notice** received from MEFT, outlining the scale and scope of the EIA to be conducted.
6. Kindly acknowledge receipt of this notification.

Thanking you.

Joel Shafashike
Member - Ekwao Consulting

TSUMEB MUNICIPALITY
Administration Office

Date: 29 MAY 2026

Ref:

RECEIVED

APP-007393

Appendix C

NEWSPAPER ADVERTS

To place a classifieds advert with us, please contact:
Ms. Belinda Manyenga
Sales Executive
T: +264 (61) 246 136 E: belinda@confidentenamibia.com
C: +264 85 799 1378

CLASSIFIEDS

PUBLIC NOTICE
ENVIRONMENTAL IMPACT ASSESSMENT & PUBLIC CONSULTATION PROCESS

Notice is hereby given that an Environmental Scoping Assessment (ESA) and a Public Consultation Process (PCP) for an **existing** borrow pit are being conducted to realign gravel extraction from the existing borrow pit with the provisions of the Environmental Management Act.

On completion of the ESA and PCP, a formal application for an **Environmental Clearance Certificate** (ECC) will be made to the Office of Environmental Commissioner (OEC) in the Ministry of Environment, Forestry and Tourism (MEFT) for consideration to approve the required ECC.

Listed Activity	Mining and Quarrying Activities Activity No. 3.2: 'Other forms of mining or extraction of any natural resources whether regulated by law or not.'
Location	The existing borrow pit is on Portion 111 (a Portion of Portion 39) of the Consolidated Farm Tsumore No. 761 situated within the jurisdiction of the Tsumeb Municipality, Tsumeb, Oshikoto Region.
Promoter	Rainy Days Investments (Pty) Ltd
Closing Date	Stakeholders and Interested and Affected Parties (IAPs) are hereby invited to register for the EIA and to submit their comments and/or concerns. The period for public consultation is between 8 May 2026 to 30 May 2026. A Background Information Document (BID) is available upon inquiry
EIA Consultant:	Ekwao Consulting Fax: 088 645 026 Cell: 081 418 3125 Email: ekwao@iway.na

VILLAGE COUNCIL OKONGO

EXTERNAL VACANCY ANNOUNCEMENT

POSITION:	Assistant Accountant
OFFICE:	Report to the Accountant
DUTY STATION:	Okongo Village Council
GRADING:	Patterson Grade C1
BASIC SALARY SCALE:	N$ 132 753.67 – 138 227.22 p. a
OTHER BENEFITS:	13th Cheque, Transport allowance, Housing allowance, Medical Aid Scheme, and an Attractive pension
CLOSING DATE:	**10 JUNE 2026**

PURPOSE OF THE JOB
To administer creditors accounts by ensuring timeous payments. To ensure integrity of the Council's financial information.

MINIMUM REQUIREMENTS
- A Grade 12 certificate, with National Diploma in Accounting and Finance or related field, and at least 2 years appropriate working experience in Creditor and Debtors finance,
- Practical working knowledge and understanding of international Financial Report Standard (IFRS) & International Public Sector Accounting Standards (IPSAS) framework,
- Management and Financial accounting skills, analytical skills, planning skills, time management, communication, self-starter initiative, supervision skills, and good interpersonal skills,
- Sound knowledge of the Microsoft Dynamic GP Financial System & Local Authorities Act,
- Computer literacy and Customer Oriented.
- Driver's license Code B

MAIN PERFORMANCE AREAS
- Prepares creditors accounts for payments vouchers (including a full reconciliation) by correlating invoices, orders, quotations, sanctioning
- Receives evidence of receipt for goods and services rendered.
- Process all outstanding payments within 30 days.
- Create new creditors accounts on the Microsoft Dynamic GP system.
- Checks for correctness and captures data on payment invoices onto the system.
- Prints expenditure documents and forwards same to Accountant for certification.
- Receives application for down payments from applicants and consults with the supervisor on the applications received and obtain approval.
- Prints expenditure documents and forwards same to Accountant for certification.
- Assist the Accountant with the drafting of the credit control policy and stock taking
- Establishes and maintains up to date filing system to ensure effective and efficient administration of records in an orderly manner.
- Administers credits and debits journals by posting various journals onto respective accounts.
- Bank reconciliation
- Handles customers' queries by providing necessary information and advice.
- Prepares service request quotations and invoices customers for the required services accordingly.

Enquiries: Human Resource Practitioner
Private Bag 66003 Okongo
Tel: 065 288 510

NB: Okongo Village Council is an Equal Opportunity Employer. All suitably qualified **Namibian Citizens** are invited to submit their applications letters accompanied by curriculum vitae and supporting originally certified copies of documents. All foreign qualifications must be accompanied by NQA evaluation report. Women and People with Disabilities are encouraged to apply. Only shortlisted candidates will be contacted, and no documents will be returned. No faxes or e-mails will be accepted. All applications must be addressed to the Office of the Chief Executive Officer; Private Bag 66003, Okongo.

PUBLIC NOTICE
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) – SCOPING PHASE PUBLIC NOTICE

Notice is hereby given in terms of the Environmental Management Act and the Environmental Impact Assessment Regulations (2012) that a Scoping Process is being undertaken for an application for an Environmental Clearance Certificate (ECC) for the following proposed development:

PROJECT TITLE
Environmental Assessment for the Proposed Rezoning, Subdivision and Associated Infrastructure Development on Farm 29/H/48 Brakwater, approximately 20 km North of Windhoek, Khomas Region, Namibia

PROJECT DESCRIPTION
The proposed development includes land use change and related infrastructure works, namely:

- Rezoning from Residential (1:50 000 density) to Restricted Business
- Subdivision of land affected by an arterial road reserve
- Access reconfiguration to comply with arterial road requirements
- Upgrade of the existing Right of Way (ROW) servitude from 10 m to 13 m
- Construction of a junction linking to an existing collector road
- Associated traffic and stormwater infrastructure

These activities trigger listed activities requiring environmental assessment and authorisation.

PROJECT LOCATION
Farm 29/H/48 Brakwater, located approximately 20 km north of Windhoek, Khomas Region, Namibia.

- **Site Reference Coordinates (Local Grid):**
- **Point 1: X = 7163.4600, Y = -43222.7700**
- **Point 2: X = 7444.9000, Y = -43057.7000**
- **Point 3: X = 7883.6500, Y = -42922.1800**
- **Point 4: X = 7097.7200, Y = -43055.6800**

PUBLIC PARTICIPATION – SCOPING PHASE
Interested and Affected Parties (I&APs) are invited to register and submit comments, concerns, or relevant information to inform the Scoping Phase of the EIA. The Background Information Document (BID) is available upon request.

COMMENTING PERIOD: All comments must be submitted on or before 15 May 2026 (Close of Business).

REGISTRATION AND SUBMISSION OF COMMENTS
Environmental Assessment Practitioner (EAP): Erongo Consulting Group
- Email: info@erongoconsultinggroup.co.za / erongoconsulting@gmail.com
- Telephone: +264 (0) 81 878 6676

IMPORTANT NOTICE: All comments received will inform the Scoping Report, impact assessment, alternatives, and mitigation measures, while only registered I&APs will receive further notifications and access to subsequent reports.

ERONGO CONSULTING GROUP

CLASSIFIEDS

PUBLIC NOTICE
ENVIRONMENTAL IMPACT ASSESSMENT & PUBLIC CONSULTATION PROCESS

Notice is hereby given that an Environmental Scoping Assessment (ESA) and a Public Consultation Process (PCP) for an **existing** borrow pit are being conducted to realign gravel extraction from the existing borrow pit with the provisions of the Environmental Management Act.

On completion of the ESA and PCP, a formal application for an **Environmental Clearance Certificate** (ECC) will be made to the Office of Environmental Commissioner (OEC) in the Ministry of Environment, Forestry and Tourism (MEFT) for consideration to approve the required ECC.

Listed Activity	Mining and Quarrying Activities Activity No. 3.2: 'Other forms of mining or extraction of any natural resources whether regulated by law or not.'
Location	The existing borrow pit is on Portion 111 (a Portion of Portion 39) of the Consolidated Farm Tsumore No. 761 situated within the jurisdiction of the Tsumeb Municipality, Tsumeb, Oshikoto Region.
Promoter	Rainy Days Investments (Pty) Ltd
Closing Date	Stakeholders and Iinterested and Affected Parties (IAPs) are hereby invited to register for the EIA and to submit their comments and/or concerns. The period for public consultation is between 8 May 2026 to 30 May 2026. A Background Information Document (BID) is available upon inquiry
EIA Consultant:	Ekwao Consulting Fax: 088 645 026 Cell: 081 418 3125 Email: ekwao@iway.na

DESERT FRUIT
NAMIBIA

We call on all candidates meeting criteria to apply for the following vacancy.

Location: Ariamsvlei
Industry: Agriculture / Horticulture
Employment Type: Full-time

ASSISTANT PACKHOUSE MANAGER

Key Responsibilities

- Manage daily packhouse operations, including staff scheduling, workflow, and output targets.
- Ensure compliance with food safety, hygiene, and health & safety standards (ISO, HACCP, Global G.A.P).
- Oversee grading, packing, and storage processes to maintain product quality.
- Monitor and optimize productivity, minimizing waste and maximizing efficiency.
- Lead, train, and motivate packhouse staff to achieve operational excellence.
- Coordinate with farm management, logistics, and sales teams to align supply and demand.
- Maintain accurate records of production, inventory, and dispatch.
- Implement continuous improvement initiatives in line with industry best practices.

Requirements

- Proven experience in packhouse or agricultural operations management (dates or fresh produce preferred).
- Strong knowledge of **product quality standards** and grading processes.
- Experience with **Paltrak** or other packing system software is advantageous.
- Experience in a **food manufacturing factory environment** is advantageous.
- Relevant qualification in **Food Science, Agriculture, or Quality Management**.
- Strong leadership and team management skills.
- Knowledge of food safety standards and compliance frameworks.
- Excellent organizational and problem-solving abilities.
- High level of **computer literacy**, including proficiency in **Excel**.
- Strong **attention to detail** and accuracy in record-keeping.
- Ability to work under pressure and meet deadlines.

Closing Date: 08 May 2026

Submit your comprehensive cv and qualifications to recruitments@desertfruit.net with the vacancy name as the Subject.

PUBLIC NOTICE: A CALL FOR PUBLIC, INTERESTED AND AFFECTED PARTIES PARTICIPATION

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) STUDY FOR THE PROPOSED DETAILED DESIGN AND CONSTRUCTION OF OXIDATION PONDS FOR ARANOS TOWN – HARDAP REGION, NAMIBIA

EnviroPlan Consulting cc, would like to inform all **Interested and Affected Parties (I&APs)** that an application for Environmental Clearance certificate will be made to the Environmental Commissioner in terms of the Environmental Management Act (No. 7 of 2007), Regulation 22 as follows;

PROJECT BACKGROUND

Purpose: To establish a sustainable wastewater treatment facility to improve sanitation, reduce pollution, and support urban growth.
Proponent: Aranos Town Council
Project Title: Construction of Oxidation Ponds for Wastewater Treatment and support structures.
Location: Aranos Town, Hardap Region, Namibia; approximately 0.7 km east of the Nossob River
Coordinates: S $24^0$08'43.6'' E 019^0 06'10.2''

PURPOSE OF THE CONSULTATIONS

As part of the ESIA process, public consultations are being held to share project information, identify potential environmental and social impacts, and obtain inputs from stakeholders and I&APs before finalisation of the Environmental scoping assessment. This will provide the public an opportunity to engage directly with the project designing team.

MEETING DETAILS

Location: Aranos – in the Location – big tree opposite Betel hostel
Date & time: Friday 15th of May 2026 at 10:00 Hrs
Deadline for submission of Comments: 20 May 2026

REGISTRATION & DOCUMENTS

To register your attendance or request Background Information Document, please submit your details to: **The Environmental Consultant -EnviroPlan Consulting cc**
Phone:+264814 087 482 **Email**: info@enviroplanconsulting.com

EnviroPlan CONSULTING
HELIOS ENGINEERING CONSULTANTS

PUBLIC NOTICE: ENVIRONMENTAL IMPACT ASSESSMENT (EIA) STUDY FOR THE PROPOSED CONSTRUCTION OF A NEW LATTICE (FREE STANDING) TELECOMMUNICATION TOWER SITE ON ERF 3973 OF EXTENSION 4 IN NKURENKURU TOWN, KAVANGO WEST REGION

The public is notified that an Environmental Clearance Certificate (ECC) application 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.

Project Proponent: Mobile Telecommunications Limited (*MTC Namibia*)

Environmental Assessment Practitioner: Serja Hydrogeo-Environmental Consultants CC

Project Nature and Location: The construction of a 25m high lattice (free-standing) telecommunication tower on Erf 3973 of Extension 4 in Nkurenkuru Town, Kavango West Region (*site name: Nkurenkuru Ex. 4*. The proposed site is near the edge of the Townland boundaries (GPS coordinates: -17.645500 18.586111) and about 1km southwest of the Elcin Nkurenkuru High School. The site will cover a surface area of about 144m^2 (12m by 12 m), and it will host 3x dual-band antennas and 1x microwave dish.

The public is therefore invited to register as Interested and Affected Parties (I&APs) and submit comments, concerns (**in writing**), or receive further information on the EIA Study (such as the Background Information Document (BID)). The deadline for registration and submission of comments, issues, or concerns is **Tuesday, 26 May 2026. A consultation meeting will be held in Nkurenkuru on Wednesday, 29 April 2026; Time: 10:00 AM; Venue: Nkurenkuru Community Hall.**

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

Mobile No: +264 (0) 81 749 9223 (by sending an SMS or WhatsApp for easy recording of comments)

Email: eias.public@serjaconsultants.com (direct email or scanned/photos of legible handwritten letters

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SERJA HGE CONSULTANTS

To place a classifieds advert with us, please contact:
Ms. Belinda Manyenga
Sales Executive
T: +264 (61) 246 136 E: belinda@confidentenamibia.com
C: +264 85 799 1378

CLASSIFIEDS

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ERONGO CONSULTING GROUP

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Date & time: Friday 15th of May 2026 at 10:00 Hrs
Deadline for submission of Comments: 20 May 2026
REGISTRATION & DOCUMENTS
To register your attendance or request Background Information Document, please submit your details to: **The Environmental Consultant -EnviroPlan Consulting cc**
Phone:+264814 087 482 **Email**: info@enviroplanconsulting.com

EnviroPlan | HEC HELIOS ENGINEERING CONSULTANTS

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

Mobile No: +264 (0) 81 749 9223 (by sending an SMS or WhatsApp for easy recording of comments)

Email: eias.public@serjaconsultants.com (direct email or scanned/photos of legible handwritten letters

MTC | SERJA HGE CONSULTANTS