

STAKEHOLDER ENGAGEMENT REPORT

Proposed Orange River Water Abstraction and Supply Infrastructure Environmental Impact Assessment

Noordoewer, IlKharas Region, Namibia



Prepared for:

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On behalf of Namibia Water Corporation Ltd.

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ACRONYMS AND ABBREVIATIONS

Acronym / Abbreviation	Meaning
BID	Background Information Document
BTA	Bondelswarts Traditional Authority
CBO	Community-Based Organisation
CDC	Constituency Development Committee
ECC	Environmental Clearance Certificate
EIA	Environmental Impact Assessment
EMA	Environmental Management Act (No. 7 of 2007)
EMP	Environmental Management Plan
FGD	Focus Group Discussion
I&AP	Interested and Affected Party
I&APs	Interested and Affected Parties
KP	Knight Piésold Consulting (Pty) Ltd
KRC	IlKharas Regional Council
KC	Koryx Copper Inc.
MAFWLR	Ministry of Agriculture, Fisheries, Water and Land Reform
MEFT	Ministry of Environment, Forestry and Tourism
MICT	Ministry of Information and Communication Technology
MIME	Ministry of Industries, Mines and Energy
MoHSS	Ministry of Health and Social Services
MWT	Ministry of Works and Transport
NamPower	Namibia Power Corporation (Pty) Ltd
NamWater	Namibia Water Corporation Ltd

Acronym / Abbreviation	Meaning
NCRC	Noordoewer Community Representative Committee
NGO	Non-Governmental Organisation
NHC	National Heritage Council of Namibia
NNF	Namibia Nature Foundation
NRDC	Noordoewer Residents Development Committee (<i>if used in the report</i>)
NTLA	Nama Traditional Leaders Association
ORASECOM	Orange-Senqu River Commission
RA	Roads Authority
SER	Stakeholder Engagement Report
TA	Traditional Authority
UDA	Urban Dynamics Africa (Pty) Ltd
WRMA	Water Resources Management Act (No. 11 of 2013)

1. INTRODUCTION

This Stakeholder Engagement Report (SER) documents the stakeholder engagement process undertaken in support of the Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction project to supply raw water to the proposed Haib Copper Project in the !Kharas Region of southern Namibia.

The proposed abstraction works form part of the long-term water supply solution required to support the development of the Haib Copper Project. As the abstraction of water from the Orange River constitutes a listed activity under the Environmental Management Act (No. 7 of 2007), the project is subject to a separate Environmental Impact Assessment (EIA) and Environmental Clearance Certificate (ECC) application undertaken on behalf of Namibia Water Corporation Ltd (NamWater).

The stakeholder engagement programme was undertaken to ensure that Interested and Affected Parties (I&APs), government authorities, landowners, water users, community representatives and other stakeholders were provided with meaningful opportunities to obtain information on the proposed abstraction works, raise concerns, contribute local knowledge and provide comments throughout the environmental assessment process.

Although the proposed abstraction works are intended to supply raw water to the Haib Copper Project, the mining development is being assessed through a separate Environmental and Social Impact Assessment (ESIA). Where appropriate, consultation activities for the two assessment processes were coordinated to improve efficiency, provide stakeholders with a comprehensive understanding of the proposed developments and avoid duplication of engagement activities.

This report provides a consolidated record of the stakeholder engagement activities undertaken during both the Scoping and Impact Assessment phases. It documents the consultation process followed, stakeholder participation, the issues and concerns raised, and the manner in which stakeholder input has informed the EIA.

1.1 PROJECT OVERVIEW

NamWater proposes to develop water abstraction infrastructure on the Orange River to provide a reliable raw water supply to the proposed Haib Copper Project near Noordoewer in the !Kharas Region of southern Namibia.

The proposed project comprises a side-intake abstraction structure on the Orange River, abstraction pumps, an approximately 8 km bulk water pipeline, booster pump station(s), a flow gauging station and associated infrastructure required for the operation and maintenance of the abstraction system, including access roads and electrical supply. The broader water supply system also includes an off-channel storage dam within the Haib Project area, which forms part of the overall water supply solution.

The abstraction infrastructure has been designed to provide a secure and sustainable raw water supply to meet the operational water requirements of the proposed Haib Copper Project. Operation of the abstraction system will be guided by hydrological investigations, water resource assessments and operational controls to ensure compliance with applicable regulatory requirements while minimising potential impacts on downstream water users and the Orange River system.

Although the proposed mining development is the primary end-user of the water supply, the mining activities are being assessed separately through a parallel ESIA. Consequently, this Stakeholder Engagement Report focuses on stakeholder engagement relating to the proposed NamWater abstraction project and the associated environmental and social considerations.

1.2 PROJECT LOCATION

The proposed water abstraction infrastructure is located on the northern bank of the Orange River, upstream of the confluence with the Haib River, approximately 40 km north-west of Noordoewer in the !Kharas Region of southern Namibia.

Water abstracted from the Orange River will be conveyed via a bulk water pipeline towards the Haib Project area. The abstraction corridor traverses an arid landscape characterised by ephemeral drainage systems, commercial farming activities, irrigated agriculture associated with the Orange River, tourism activities, and environmentally sensitive terrestrial and aquatic ecosystems.

The Orange River is a strategically important transboundary water resource supporting domestic, agricultural, industrial and ecological water requirements in both Namibia and South Africa. Consequently, the proposed abstraction infrastructure has been assessed with particular consideration of downstream water users, environmental flow requirements and regional water resource management.

Figure 1 illustrates the location of the proposed NamWater abstraction infrastructure and associated project area in relation to the Orange River, the Haib Copper Project and the surrounding area.

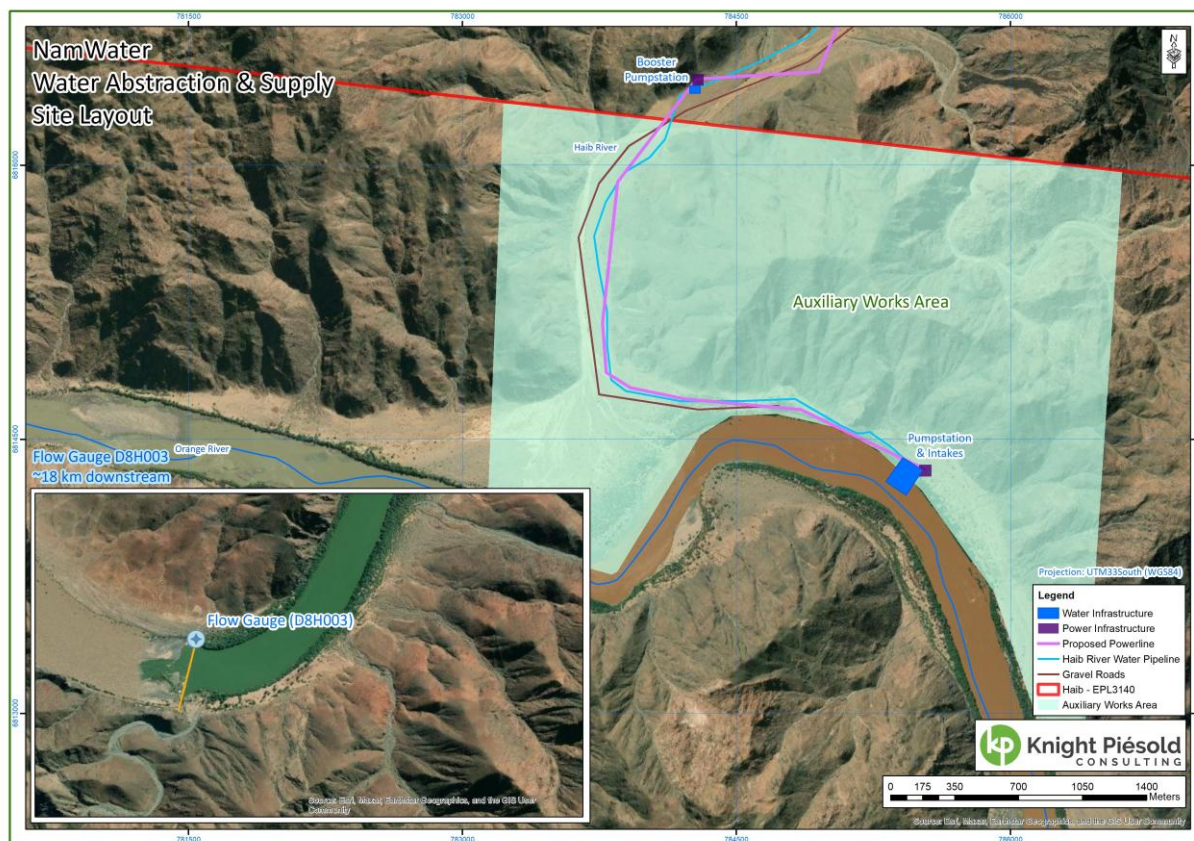


Figure 1: Proposed NamWater Project Location

1.3 STAKEHOLDER ENGAGEMENT PROCESS

Stakeholder engagement formed an integral component of the EIA process and was undertaken throughout the Scoping and Impact Assessment phases. The process provided stakeholders with opportunities to obtain information on the proposed abstraction project, understand the environmental assessment process, identify issues and concerns, contribute local knowledge and comment on the findings of the EIA.

During the Scoping Phase, engagement focused on introducing the proposed abstraction project, identifying Interested and Affected Parties, and identifying environmental and social issues requiring further investigation through specialist studies.

During the Impact Assessment Phase, consultation focused on presenting the findings of the specialist studies, explaining the identified impacts and proposed mitigation measures, disclosing the Draft EIA and Environmental Management Plan (EMP), and obtaining stakeholder feedback prior to finalisation of the assessment documentation.

The stakeholder engagement process was undertaken in accordance with the Environmental Management Act (No. 7 of 2007), the Environmental Impact Assessment Regulations (Government

Notice No. 30 of 2012), and recognised international good practice principles for transparent, inclusive and meaningful stakeholder participation.

Figure 2 illustrates the relationship between stakeholder engagement and the overall environmental assessment process.

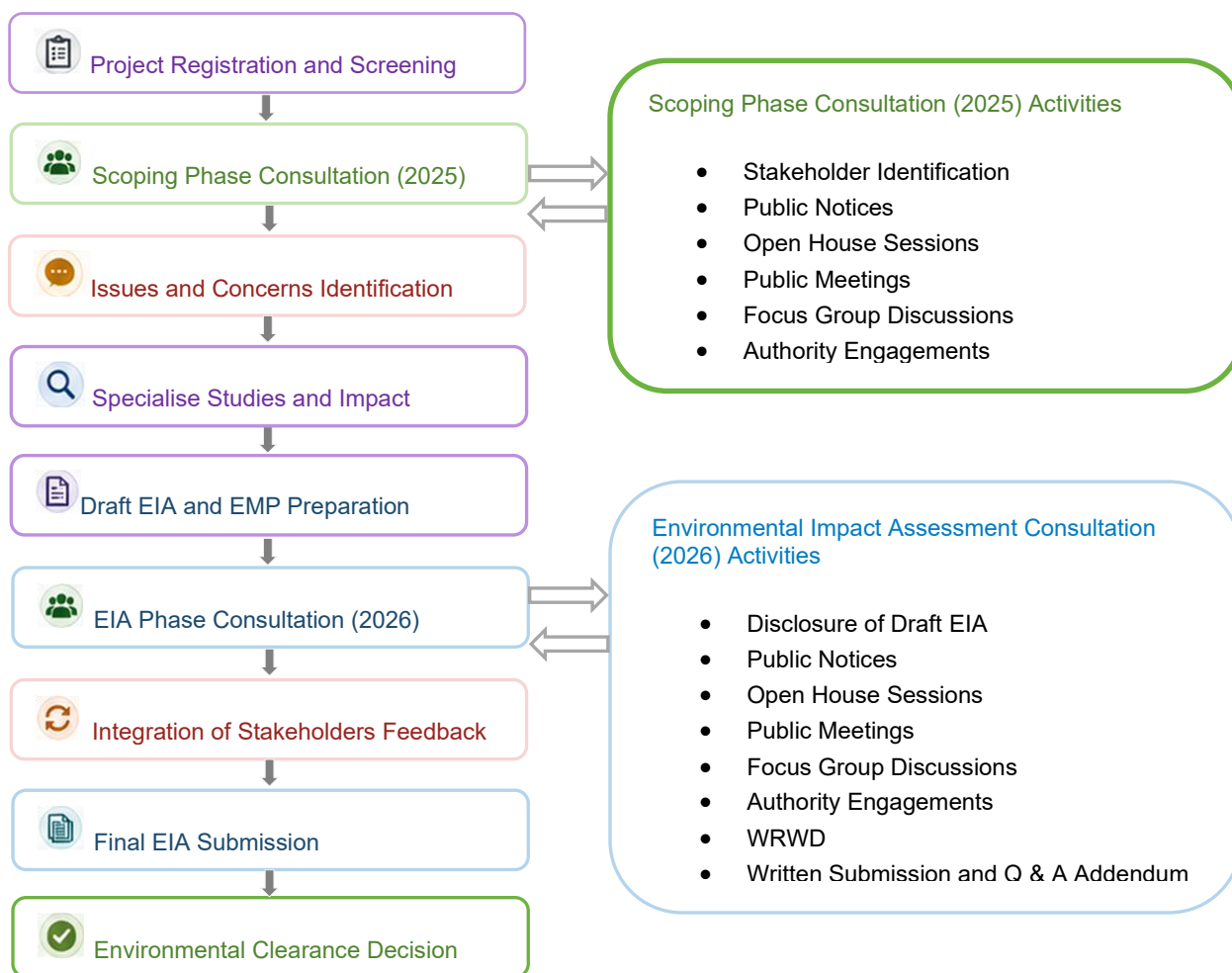


Figure 2: Stakeholder Engagement Diagram

1.4 OBJECTIVES OF STAKEHOLDER ENGAGEMENT

The objectives of the stakeholder engagement programme were to:

- Provide stakeholders with timely, accurate and accessible information regarding the proposed abstraction project.
- Identify environmental, social and economic issues requiring consideration during the EIA process.
- Obtain stakeholder input to inform specialist investigations and the environmental assessment.
- Provide opportunities for stakeholders to review and comment on the Draft EIA and Environmental Management Plan.

- Facilitate dialogue on matters relating to water abstraction, downstream water users, environmental flows, agriculture and regional water resource management.
- Maintain transparent and ongoing communication between NamWater, the Environmental Assessment Team and stakeholders throughout the assessment process.

The objectives of stakeholder engagement are summarised in Table 1.

Table 1: Objectives of Stakeholder Engagement

	Objective	Description
	Information Disclosure	Provide stakeholders with timely, accurate and accessible information regarding the proposed Orange River water abstraction project and the EIA process.
	Stakeholder Participation	Provide I&APs and other stakeholders with meaningful opportunities to participate throughout the EIA process.
	Identification of Issues and Concerns	Identify environmental and social issues and concerns associated with the proposed developments.
	Input into Specialist Studies	Incorporate stakeholder knowledge and concerns into specialist studies, impact assessments and the identification of appropriate mitigation measures.
	Disclosure of Assessment Findings	Present the findings of the EIA and Environmental Management Plan (EMP), including identified impacts and proposed mitigation measures, for stakeholder review and comment.
	Ongoing Communication	Maintain transparent, inclusive and responsive communication between NamWater, the Environmental Assessment Team and stakeholders throughout the assessment process.
	Integration of Stakeholder Input	Ensure that stakeholder comments, concerns and recommendations are appropriately considered and documented during the environmental assessment and decision-making process.

1.5 ROLES AND RESPONSIBILITIES

Knight Piésold Consulting (Pty) Ltd was appointed as the independent Environmental Assessment Practitioner (EAP) responsible for undertaking the Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction project on behalf of Namibia Water Corporation Ltd (NamWater).

Urban Dynamics Africa (Pty) Ltd (UDA) was appointed by Knight Piésold to plan, coordinate and facilitate the stakeholder engagement process. UDA was responsible for stakeholder identification, preparation and distribution of consultation material, stakeholder liaison, facilitation of stakeholder meetings, maintenance of the stakeholder database, documentation of stakeholder comments and preparation of this Stakeholder Engagement Report.

Namibia Water Corporation Ltd (NamWater) is the project proponent and participated throughout the stakeholder engagement process by providing technical information on the proposed abstraction project and responding to stakeholder queries relating to the proposed infrastructure and water resource management.

Representatives of Koryx Copper Inc. participated in selected stakeholder engagement activities to provide contextual information on the proposed Haib Copper Project, which is the intended recipient of the proposed raw water supply. Their participation assisted stakeholders in understanding the relationship between the proposed abstraction project and the mining development, while recognising that each project is subject to a separate environmental assessment and environmental authorisation process.

The stakeholder engagement process was undertaken within the legislative and policy framework outlined in Section 2.

2. LEGISLATIVE AND POLICY CONTEXT

The stakeholder engagement process for the proposed Orange River water abstraction project was undertaken in accordance with the legislative and policy framework governing environmental assessment, public participation and water resources management in Namibia.

The Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012) establish the primary legislative framework for public participation during the Environmental Impact Assessment (EIA) process. As the proposed project involves the abstraction of water from the Orange River, the Water Resources Management Act (No. 11 of 2013) and the Water Resources Management Regulations, GN No. 269 of 2023, are also directly applicable.

In addition to the applicable national legislation, recognised international good practice principles were considered to support transparent information disclosure, meaningful stakeholder participation and effective consultation throughout the EIA process.

The legislation, regulations and international good practice guidance applicable to the stakeholder engagement process are summarised in Table 2.

Table 2: Applicable Legislation and International Good Practice

Legislation / Standard	Relevance
Environmental Management Act (No. 7 of 2007)	Establishes the overarching framework for environmental management in Namibia and requires listed activities to obtain an Environmental Clearance Certificate (ECC). The Act also provides the basis for public participation and consideration of stakeholder input during the EIA process.
Environmental Impact Assessment Regulations, GN No. 30 of 2012	Prescribes the procedures for environmental assessment, including stakeholder identification, public notification, consultation, information

Legislation / Standard	Relevance
	disclosure, documentation of comments received and preparation of environmental assessment reports.
Water Resources Management Act (No. 11 of 2013)	Provides detailed requirements relating to water abstraction licences, water quality monitoring, dam safety, flood management and activities affecting water resources. The Act regulates water abstraction, water use licensing, water quality protection and management of internationally shared watercourses, making it directly applicable to the proposed Orange River abstraction project.
Water Resources Management Regulations, GN No. 269 of 2023	Supports implementation of the Water Resources Management Act by prescribing requirements relating to water abstraction licences, dam safety, water quality monitoring, flood management and activities affecting water resources.
Namibia Water Corporation Act (No. 12 of 1997)	Establishes Namibia Water Corporation Ltd (NamWater) and defines its mandate to develop, operate and maintain bulk water supply infrastructure. The proposed abstraction project falls within NamWater's statutory functions.
National Heritage Act (No. 27 of 2004)	Provides for the identification, protection and management of heritage resources that may be affected by the proposed project and informs heritage-related specialist studies and consultation.
Nature Conservation Ordinance No. 4 of 1975	Provides for the protection of indigenous flora and fauna and is relevant where project activities may affect protected species or sensitive habitats.
Roads Authority Act (No. 17 of 1999)	Relevant to access roads associated with the proposed abstraction infrastructure and traffic management during construction and operation.
International Finance Corporation (IFC) Performance Standard 1 (PS1)	Provides international good practice guidance on stakeholder engagement, information disclosure, environmental and social assessment, and ongoing consultation throughout the project lifecycle.
World Bank Environmental and Social Standard 10 (ESS10)	Provides guidance on meaningful stakeholder engagement throughout the project lifecycle.
IFC Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (2007)	Provides practical guidance on planning, implementing and documenting stakeholder engagement programmes in accordance with international good practice.

3. STAKEHOLDER IDENTIFICATION AND ENGAGEMENT METHODOLOGY

A structured stakeholder identification and engagement methodology was adopted to ensure that I&APs and other relevant stakeholders were provided with meaningful opportunities to participate throughout the EIA process for the proposed Orange River water abstraction project.

The stakeholder engagement programme was designed to identify individuals, communities, organisations, businesses and government institutions that may be affected by the proposed project, have an interest in the project, or hold statutory responsibilities relevant to the environmental assessment. The methodology further sought to promote transparent communication, facilitate stakeholder participation and ensure that stakeholder comments and concerns informed the EIA process.

A phased and multi-channel engagement approach was implemented throughout the Scoping and Impact Assessment phases. Consultation activities included public notices, direct stakeholder engagement, meetings with authorities and key stakeholder groups, distribution of project information, written correspondence and opportunities for stakeholders to submit comments throughout the assessment process.

The stakeholder engagement methodology was implemented in accordance with the Environmental Management Act (No. 7 of 2007), the Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012) and recognised international good practice principles.

3.1 STAKEHOLDER IDENTIFICATION

Stakeholders were identified through a structured stakeholder mapping process based on the characteristics of the project area, the nature of the proposed abstraction project and the potential environmental and social impacts associated with the proposed development.

Stakeholder identification considered:

- proximity to the project area;
- potential environmental and socio-economic impacts;
- land ownership and existing land use;
- water resource use and agricultural activities;
- tourism and business interests;
- regulatory and governance responsibilities;
- community representation structures; and
- stakeholder interest in the proposed project.

The stakeholder database was initially developed during the Scoping Phase and was continuously updated throughout the Impact Assessment Phase as additional stakeholders were identified through referrals, stakeholder registrations and ongoing consultation activities.

Stakeholder identification was informed by:

- stakeholder information obtained during previous consultation activities;
- landowner and business contact information;
- information obtained from national, regional and local authorities;
- referrals received during consultation meetings; and
- registration of Interested and Affected Parties throughout the EIA process.

Given the regional importance of the Orange River as a shared water resource, the stakeholder identification process also included downstream landowners, agricultural producers, irrigation stakeholders, Traditional Authorities and organisations with an interest in water resource management to

ensure that the consultation process reflected the broader area of influence of the proposed abstraction project.

3.2 STAKEHOLDER PRIORITISATION

Following stakeholder identification, stakeholders were prioritised according to their potential level of influence on, and interest in, the proposed project. This assisted in determining the most appropriate consultation methods and communication strategies for different stakeholder groups throughout the EIA process.

Stakeholders with statutory responsibilities, neighbouring landowners, downstream water users, Traditional Authorities and communities potentially affected by the proposed abstraction project received a higher level of engagement through direct consultation, targeted meetings and ongoing communication.

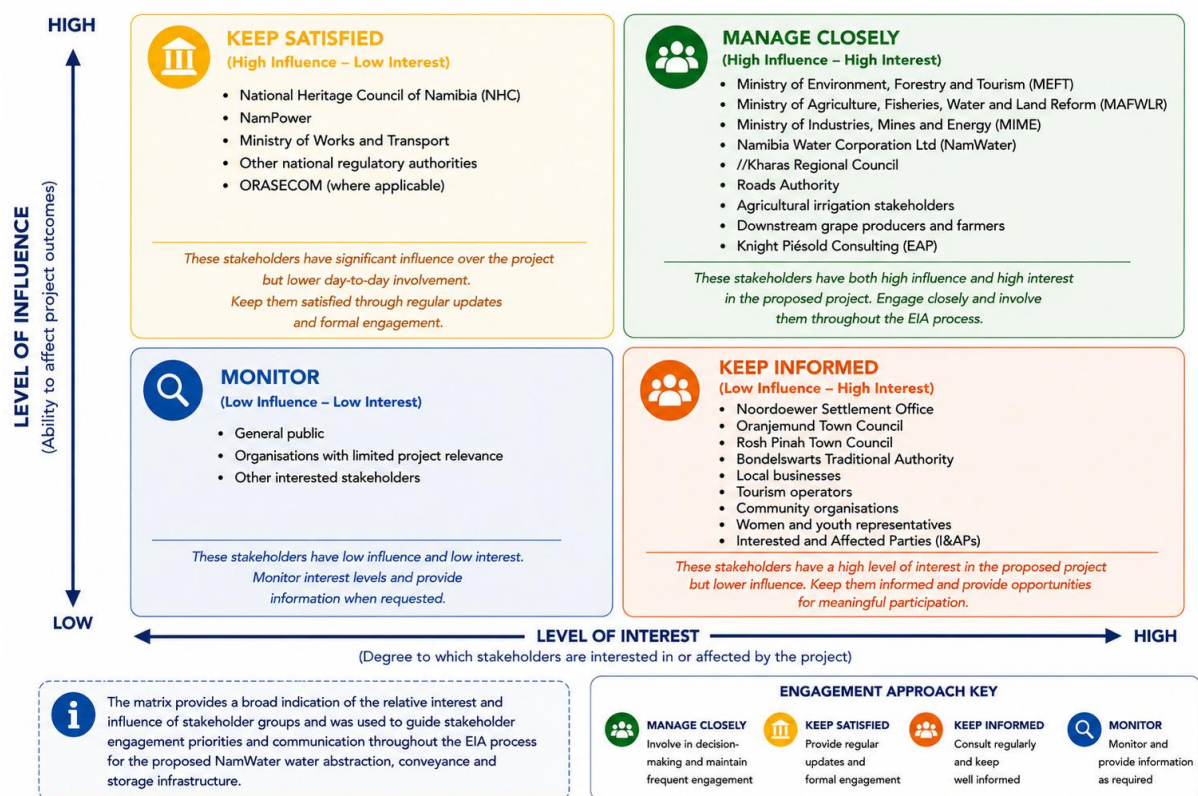


Figure 3 illustrates the stakeholder interest–influence matrix used to guide stakeholder engagement planning for the proposed project.

Figure 3: Stakeholder Interest–Influence Matrix

The matrix served as a planning tool to prioritise engagement activities and allocate communication resources effectively, ensuring that stakeholders with greater influence or a higher likelihood of being affected by the project received appropriate opportunities to participate throughout the environmental assessment process.

3.3 STAKEHOLDER DATABASE

A stakeholder database was established at the commencement of the EIA process and maintained throughout the stakeholder engagement programme. The database served as the primary mechanism for recording stakeholder information, managing consultation activities and maintaining communication with Interested and Affected Parties.

The stakeholder database included:

- national, regional and local government authorities;
- Traditional Authorities;
- neighbouring and downstream landowners;
- agricultural producers and irrigation stakeholders;
- local businesses and tourism operators;
- community organisations and representatives;
- registered I&APs;
- participants attending consultation meetings; and
- stakeholders submitting written comments, enquiries or objections.

The stakeholder database was used to distribute project information, issue consultation notices, circulate the Background Information Document (BID), Draft EIA and supporting documentation, record stakeholder comments and responses, maintain consultation records, and facilitate ongoing communication throughout the EIA process.

A summary stakeholder register identifying the principal stakeholder groups consulted during the EIA process is provided in Appendix A. Personal contact details have been omitted from the public version of this report to protect stakeholder confidentiality and comply with applicable privacy requirements.

3.4 STAKEHOLDER CATEGORIES

The main stakeholder categories identified during the consultation process are summarised in Table 3.

Table 3: Main Stakeholder Categories

Stakeholder Category	Stakeholders / Institutions
National Authorities	Ministry of Environment, Forestry and Tourism (MEFT); Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR); Ministry of Industries, Mines and Energy (MIME); Ministry of Works and Transport (MWT); Roads Authority (RA); Namibia Water Corporation Ltd (NamWater); NamPower; National Heritage Council of Namibia (NHC).
Regional and Local Authorities	IlKharas Regional Council; Noordoewer Settlement Office; Oranjemund Town Council; Rosh Pinah Town Council; Constituency Offices.
Traditional Authorities and Regional Stakeholders	Bondelswarts Traditional Authority; Nama Traditional Leaders Association (NTLA); other traditional leadership structures

Stakeholder Category	Stakeholders / Institutions
Agricultural Stakeholders	Neighbouring and downstream farmers; grape producers; irrigation stakeholders; small-scale farmers
Community Stakeholders	Residents of Noordoewer and surrounding areas; Noordoewer Community Representative Committee and women and youth representatives
Businesses and Tourism Operators	Local businesses; fuel stations; tourism operators; logistics and service providers
NGOs and Associations	Namibia Nature Foundation (NNF); Griep Watch; community-based organisations (CBOs); non-governmental organisations (NGOs).
Interested and Affected Parties	Registered I&APs and members of the public

Following stakeholder identification and categorisation, a range of notification and information disclosure methods were implemented to ensure stakeholders were informed throughout the EIA process.

4. CONSULTATION NOTIFICATION AND INFORMATION DISCLOSURE METHODS

The consultation notification and information disclosure programme was implemented throughout the Scoping and Impact Assessment phases of the environmental assessment process to ensure that I&APs and other stakeholders were informed of the proposed development and provided with opportunities to participate in the environmental assessment process.

During the Scoping Phase, the proposed Orange River water abstraction formed part of the broader Haib Copper Project ESIA and stakeholder engagement was undertaken through a single consultation programme. Following completion of the Scoping Phase, it was determined that the proposed abstraction of water from the Orange River required a separate EIA on behalf of NamWater. Consultation activities undertaken during the Impact Assessment Phase therefore distinguished between the Haib Copper Project ESIA and the NamWater EIA while continuing to explain the relationship between the two projects.

The notification and information disclosure methods used during the stakeholder engagement programme are summarised in Table 4.

Table 4 :Consultation Notification and Information Disclosure Methods

Method	Purpose / Application
Newspaper notices	Public notification of the proposed Project and consultation opportunities through newspapers with relevant national and regional circulation.
Site and public notices	Display of Project and consultation information at accessible public locations within relevant communities and stakeholder areas.
Written notifications and invitations	Notification of relevant authorities, organisations and identified stakeholders.

Method	Purpose / Application
Background Information Documents	Provision of accessible Project information to support informed participation.
Information posters	Visual presentation of Project information and assessment findings during consultation activities.
Radio announcements	Notification of consultation meetings and participation opportunities.
Email	Distribution of invitations, Project information, reports and correspondence.
WhatsApp and SMS	Distribution of meeting reminders, consultation information, and other relevant updates directly to stakeholders.
Social media	Wider dissemination of Project and consultation information through relevant social media platforms.
Direct communication	Targeted communication with identified stakeholders.

4.1 INFORMATION PROVIDED TO STAKEHOLDERS

Throughout the consultation programme, stakeholders were provided with sufficient information to enable informed participation in the environmental assessment process.

Information made available to stakeholders included:

- an overview of the proposed Orange River water abstraction project;
- the relationship between the proposed water abstraction project and the Haib Copper Project;
- the purpose and scope of the EIA;
- opportunities to participate in the consultation process;
- consultation meeting dates, venues and arrangements;
- the availability of the Draft EIA and EMP;
- the locations where hard copies of the draft documentation could be reviewed;
- procedures for submitting comments and registering as an I&AP; and
- project contact details for obtaining additional information.

Electronic access to project information was provided through the dedicated project webpage, where stakeholders could view and download the BID, Draft EIA and supporting information. Stakeholders were also able to register as I&APs and submit comments or enquiries via the dedicated project email address (ESIAHaib@udanam.com).

Information was disseminated through BIDs, newspaper notices, site notices, stakeholder meetings, radio announcements, direct correspondence and electronic communication.

4.2 NEWSPAPER NOTICES

Newspaper notices were published during both consultation phases to notify stakeholders of the proposed development, the environmental assessment process and opportunities to participate in the consultation programme.

The newspapers used during the consultation process are summarised in Table 5.

Table 5: Newspapers Used During the Consultation Process

Newspaper	Purpose / Coverage
The Namibian	National English-language newspaper used for broader public notification.
Market Watch	National publication distributed through Namibian Sun, Republikein and Allgemeine Zeitung.

Newspaper notices for the Scoping Phase were published on 17 and 24 July 2025, while notices for the Impact Assessment Phase were published on 31 March and 7 April 2026.

Copies of the newspaper notices are provided in Appendix B.A.2.

4.3 SITE AND PUBLIC NOTICES

Site and public notices were displayed at strategic locations throughout the project area during both consultation phases to notify local communities, landowners and other stakeholders of the proposed development and consultation opportunities.

The notice locations are summarised in Table 6.

Table 6: Site and Public Notice Locations

Location	Scoping Phase	Impact Assessment Phase
EPL 3140 Site Entrance	✓	✓
Noordoewer Settlement Office	✓	✓
Karasburg East Constituency Office	✓	✓
Ilkharas Regional Council Office, Keetmanshoop	—	✓
Engen Service Station	✓	✓
Shell Noordoewer	✓	✓
Wimpy Noordoewer	✓	✓
Oranja Shop	✓	✓

Copies and photographic records of the notices are provided in Appendix B.

4.4 STAKEHOLDER NOTIFICATIONS AND INVITATIONS

Identified stakeholders were notified of consultation activities through formal invitation letters, email, telephone calls, WhatsApp and other communication methods appropriate to each stakeholder group.

The notification process included government authorities, regional and local authorities, Traditional Authorities, neighbouring landowners, agricultural stakeholders, businesses, tourism operators, environmental organisations, community representatives and registered II&APs.

The stakeholder notification methods are summarised in Table 7.

Table 7: Stakeholder Notifications and Invitations

Stakeholder Group	Notification Method	Purpose
National Government Authorities	Formal invitation letters; email	To notify authorities of the EIA process and invite participation in stakeholder meetings and review of the Draft EIA.
Regional and Local Authorities	Email; telephone; formal invitation letters	To provide project information and invite participation in consultation meetings.
Traditional Authorities	Formal invitation letters; telephone; email	To inform Traditional Authorities of the proposed project and encourage participation in the consultation process.
Neighbouring Landowners and Agricultural Stakeholders	Email; telephone; WhatsApp	To notify stakeholders of consultation activities, public review periods and opportunities to provide comments.
Businesses and Tourism Operators	Email; telephone; WhatsApp	To invite participation in stakeholder meetings and obtain input on potential project impacts and opportunities.
Environmental Organisations and NGOs	Email	To provide project information and invite comments on the Draft EIA.
Registered Interested and Affected Parties (II&APs)	Email; WhatsApp; SMS	To distribute project updates, consultation notices, meeting invitations and information on public review periods.
General Public	Newspaper notices; site notices; radio announcements; social media	To create public awareness of the proposed project, consultation opportunities and availability of the Draft EIA .

4.5 BACKGROUND INFORMATION DOCUMENT

BIDs were prepared and distributed throughout the consultation programme to provide stakeholders with accessible information on the proposed development and the environmental assessment process.

The BIDs described the proposed project, outlined the environmental assessment process, explained opportunities for stakeholder participation and provided contact details for registration as an Interested and Affected Party.

Electronic copies of the BID and Draft EIA were made available through the dedicated project webpage, while comments and enquiries could be submitted throughout the consultation process via the project email address.

Copies of the BIDs and supporting information materials are included in Appendix B.A.1.

4.6 RADIO ANNOUNCEMENTS

Radio announcements were broadcast during both consultation phases to notify stakeholders of consultation meetings, public review periods and opportunities to participate in the environmental assessment process.

The radio stations, broadcast languages and notification periods are summarised in Table 8.

Table 8: Radio Announcements Used During the Consultation Process

Phase	Stations	Languages	Purpose	Period
Scoping Phase	IlKharas Community Radio, Hardklop FM, Kaisames FM, NBC National Radio	Afrikaans, English, Nama.	Public meeting and consultation notification	July–August 2025
Impact Assessment Phase	IlKharas Community Radio, NBC National Radio	Afrikaans, English.	Draft ESIA disclosure and stakeholder feedback meeting notification	April 2026

Copies of the radio announcement scripts, broadcast schedules and supporting correspondence are provided in Appendices B.A.4 and B.B.4.

4.7 ELECTRONIC COMMUNICATION AND SOCIAL MEDIA

Electronic communication formed an important component of the stakeholder engagement programme. Email, WhatsApp, SMS and social media platforms were used to distribute consultation notices, meeting invitations, project updates and reminders to registered stakeholders and Interested and Affected Parties.

Supporting records of electronic communication and social media notifications are provided in Appendix B.

The notification and disclosure activities described above supported the stakeholder engagement programme undertaken during the Scoping and Impact Assessment phases.

5. SCOPING PHASE STAKEHOLDER ENGAGEMENT ACTIVITIES

During the Scoping Phase, stakeholder engagement was undertaken as part of the ESIA for the proposed Haib Copper Project. At that stage, the proposed Orange River water abstraction and associated water supply infrastructure formed part of the overall project and were presented as an integral component of the proposed mining development. Consequently, stakeholder discussions addressed both the proposed mine and its associated infrastructure, including the proposed abstraction of water from the Orange River.

5.1 OBJECTIVE OF THE SCOPING PHASE ENGAGEMENT

The primary objective of the Scoping Phase stakeholder engagement process was to identify environmental and social issues, concerns and opportunities requiring consideration in the ESIA and associated specialist studies. The engagement process was undertaken to:

- introduce the proposed Haib Copper Project and provide stakeholders with information on the proposed activities and associated infrastructure;
- explain the purpose, scope and process of the ESIA;
- identify environmental and social issues, concerns, opportunities and potential impacts at an early stage of the assessment process;
- obtain local and stakeholder knowledge to inform the scope and focus of the specialist studies;
- identify stakeholders and stakeholder groups that may be affected by, or have an interest in, the proposed Project;
- provide stakeholders with an opportunity to ask questions and provide comments and recommendations; and
- establish a basis for continued stakeholder participation during the subsequent phases of the ESIA process.

The Scoping Phase stakeholder engagement programme comprised:

- one (1) National Authority Stakeholder Meeting held in Windhoek;
- one (1) Open House information session;
- one (1) Public Meeting held at EHW Baard Primary School in Noordoewer;
- five (5) Focus Group Discussions (FGDs) held in Noordoewer; and
- one (1) Regional Authority Meeting held at the !Kharas Regional Council offices in Keetmanshoop.

In total, nine (9) direct stakeholder engagement activities were undertaken during the Scoping Phase.

ENGAGEMENT SCHEDULE

Table 9 provides an overview of the dates, times and venues of the direct stakeholder engagement activities undertaken during the Scoping Phase.

Table 9: Scoping Phase Engagement Schedule

Type of Meeting	Date and Time	Venue
National Authority Stakeholder Meeting	8 August 2025, 09:00–12:00	Opera House, The Village, Windhoek
Open House	11 August 2025, 09:00–13:00	EHW Baard Primary School, Noordoewer
Public Meeting	11 August 2025, 17:30–19:30	EHW Baard Primary School, Noordoewer
Women's Focus Group Discussion	11 August 2025, 19:30–20:00	EHW Baard Primary School, Noordoewer
Business, Farmers and Tourism Focus Group Discussion	12 August 2025, 09:00–10:30	Noordoewer Guesthouse, Noordoewer
Bondelswarts Traditional Authority Focus Group Discussion	12 August 2025, 11:00–13:00	Noordoewer Guesthouse, Noordoewer
Constituency Development Committee Focus Group Discussion	12 August 2025, 14:00–15:30	Noordoewer Guesthouse, Noordoewer
Noordoewer Community Representative Committee Focus Group Discussion	12 August 2025, 17:30–18:30	Noordoewer Guesthouse, Noordoewer
Regional Authority Meeting	13 August 2025, 10:00–12:00	IlKharas Regional Council Offices, Keetmanshoop

5.2 MEETING AGENDA AND INFORMATION SHARING

At the stakeholder meetings, a PowerPoint presentation was delivered by representatives of Koryx Copper (KC) and Knight Piésold Consulting (KP). The presentation provided an overview of the proposed Haib Copper Project and the ESIA process and covered the following topics:

- background to the Haib Copper Project (EPL 3140);
- purpose and scope of the ESIA;
- proposed mining activities and associated infrastructure;
- key environmental and social aspects under consideration; and
- opportunities for stakeholder participation throughout the ESIA process.

The presentation was delivered in English, with questions and discussions facilitated in both English and Afrikaans where required. A copy of the Scoping Phase presentation is provided in Appendix C.1.

During the Open House session, a series of information posters were displayed to facilitate informal engagement between stakeholders and the Project Team. The posters provided visual information on the proposed Project, the ESIA process, Project location, associated infrastructure and the environmental and social specialist studies being undertaken. Copies of the information posters are provided in Appendix B.A.3.

The stakeholder engagement meetings constituted the primary platforms for direct consultation during the Scoping Phase. With the exception of the Open House session, the meetings generally followed a structured agenda comprising:

1. welcome and introductions;
2. Project and ESIA presentation by Koryx Copper and Knight Piésold Consulting;
3. open discussion and question-and-answer session; and
4. recording of stakeholder comments, questions and concerns.

The detailed meeting records, including meeting minutes, attendance registers and photographic records, are provided in Appendix C.2. The issues, concerns and responses arising from the Scoping Phase consultation process are provided in the meeting-specific Issues and Concerns Registers in Appendix C.3.

5.3 SUMMARY OF STAKEHOLDER ENGAGEMENT MEETINGS

The stakeholder engagement activities undertaken during the Scoping Phase are summarised below. Each meeting summary provides an overview of the meeting purpose, participants, facilitation and presentations, and the principal discussion themes and concerns raised.

5.3.1 National Authority Stakeholder Meeting – Windhoek

Date: 8 August 2025

Time: 09:00–12:00

Venue: Opera House, The Village, Windhoek

Participants: A total of 11 participants attended the meeting, including representatives of NamPower, the Namibia Nature Foundation (NNF), renewable energy and solar development interests, property and planning interests, Koryx Copper and other national-level stakeholders.

The National Authority Stakeholder Meeting provided a platform for stakeholders to receive information on the proposed Haib Copper Project, including its associated infrastructure, and to identify environmental and social matters requiring further assessment during the ESIA.

The meeting was facilitated by Veronique Daigle (KP), with presentations delivered by Trevor Faber and Charles Loots (KC) and Amelia Briel (KP). Representatives of KC and KP responded to stakeholder questions, while meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

The discussion reflected broad interest in the Project's workforce and accommodation requirements, supporting infrastructure and the scope of the ESIA. Stakeholders also sought clarification on the specialist studies being undertaken, particularly in relation to environmental sensitivities, cultural heritage and water resources.

The discussion further considered transport and potential export routes, renewable energy opportunities, local value addition and the need to coordinate Project planning with relevant government institutions and existing social structures. These discussions helped identify key environmental, social and infrastructure matters for further consideration during the ESIA process.

The detailed meeting record is provided in Appendix C.2.1. while the complete record of issues, comments and responses is provided in the Scoping Phase Issues and Concerns Register in Appendix C.3.

Photographs from the National Authority Stakeholder Meeting are provided in Figure 4.



Figure 4: Authority Meeting, Windhoek

5.3.2 Open House, Noordoewer

Date: 11 August 2025

Time: 09:00–13:00

Venue: EHW Baard Primary School, Noordoewer

Participants: Community members and other stakeholders from Noordoewer and surrounding areas. A total of 56 participants attended the session.

The Open House provided an informal and interactive platform for stakeholders to obtain information on the proposed Haib Copper Project and the ESIA process and to engage directly with the Project Team.

The session was facilitated by Amelia Briel (KP) and Heidri Nel (UDA), with administrative and logistical support provided by Kutlo Modie (KP). Information was presented through A0 visual posters and supporting Project materials covering the proposed development, Project location and infrastructure, the ESIA process and the environmental and social specialist studies being undertaken.

Stakeholders were able to move between the displays, ask questions and engage informally with members of the Project Team. The session was conducted primarily in Afrikaans, with English support provided where required.

As the Open House was intended primarily as an informal information-sharing session, comments and concerns were not formally recorded in a separate Issues and Concerns Register. Stakeholders were encouraged to participate in the Public Meeting and other consultation activities where comments and concerns were formally documented. The attendance register and photographic record are provided in Appendix C.2.2.

Figure 5 provides photographs of the Open House Information Session held in Noordoewer.



Figure 5: Open House Session – Noordoewer

5.3.3 Public Meeting, Noordoewer

Date: 11 August 2025

Time: 17:30–19:30

Venue: EHW Baard Primary School, Noordoewer

Participants: Community members and other local stakeholders. A total of 22 participants attended the meeting.

The Public Meeting provided a formal platform for community members and other stakeholders to receive information on the proposed Haib Copper Project and the ESIA process and to raise questions, concerns and recommendations. The meeting was facilitated by Kutlo Modie (KP), with presentations and responses provided by Trevor Faber (KC) and Amelia Briel (KP). Meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

The discussion reflected strong community interest in the long-term social and economic implications of the proposed Project. Stakeholders raised questions regarding the future safety and rehabilitation of the open pit following mine closure, as well as employment, education, training and skills development opportunities for local youth.

The discussion also considered potential population influx and related pressures on housing, community safety and wellbeing, together with opportunities for local economic participation and value addition. These discussions helped identify community priorities requiring further consideration during the ESIA, particularly in relation to mine closure, youth development, employment and potential social change.

The detailed meeting record, including the meeting minutes, attendance register and photographic record, is provided in Appendix C.2.3. The complete record of issues, comments and responses is provided in the Scoping Phase Issues and Concerns Register in Appendix C.3.

Photographs from the Noordoewer Public Meeting are provided in Figure 6.”



Figure 6: Public Meeting – Noordoewer

5.3.4 Women’s Focus Group Discussion

Date: 11 August 2025

Time: 19:30–20:00

Venue: EHW Baard Primary School, Noordoewer

Participants: A total of 6 women from the local community participated in the discussion following the Public Meeting.

The Women's Focus Group Discussion provided a dedicated platform for local women to raise social and community-level concerns as part of the Scoping Phase engagement process. The discussion was facilitated by Amelia Briel (KP), with meeting notes recorded by Heidri Nel (UDA).

Discussion Summary

The discussion provided insight into existing social pressures within Noordoewer, including youth alcohol and drug misuse, teenage pregnancy, unemployment and limited opportunities for young people. Participants also raised concerns about housing shortages and increasing rental costs and the potential for these pressures to intensify with future Project-related development and population influx.

Women emphasised the need for practical skills development, training and empowerment opportunities, together with longer-term support for the community. The discussion helped identify existing social conditions and community priorities requiring further consideration during the ESIA, particularly where Project-related change could place additional pressure on existing challenges.

The detailed meeting record is provided in Appendix C.2.4, while the complete record of issues, comments and responses is provided in the Scoping Phase Issues and Concerns Register in Appendix C.3. Photographs from the Women's Focus Group Discussion are provided in Figure 7 .



Figure 7: Women's Focus Group Discussion

5.3.5 Business, Farmers and Tourism Focus Group Discussion, Noordoewer

Date: 12 August 2025

Time: 09:00–10:30

Venue: Noordoewer Guesthouse, Noordoewer

Participants: A total of 17 participants attended the meeting, representing the agricultural, business, tourism, accommodation and fuel retail sectors within Noordoewer and the surrounding areas.

The Focus Group Discussion provided a platform for stakeholders whose activities are closely linked to the local economy and natural resources to raise sector-specific issues and concerns regarding the proposed Haib Copper Project. The meeting was facilitated by Kutlo Modie (KP), with presentations and responses provided by Trevor Faber (KC) and Amelia Briel (KP). Meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

Water security emerged as a central topic of discussion, particularly in relation to the proposed abstraction of water from the Orange River, long-term agricultural sustainability, irrigation requirements and downstream water users.

The discussion also considered workforce requirements, labour availability, housing and accommodation pressures, increasing operating costs, electricity supply and the potential cumulative effects of the Project on existing businesses and economic activities. While participants recognised the potential for employment and wider economic opportunities, they emphasised the importance of continued access to information on relevant specialist studies and ongoing engagement with the agricultural, business and tourism sectors as the ESIA progressed.

The detailed meeting record, including the meeting minutes, attendance register and photographic record, is provided in Appendix C.2.5. The complete record of issues, comments and responses is provided in the Scoping Phase Issues and Concerns Register in Appendix C.3.

Photographs from the Business, Farmers and Tourism Focus Group Discussion are provided in Figure 8.



Figure 8: Business, Farmers and Tourism Focus Group Discussion

5.3.6 Bondelswarts Traditional Authority Focus Group Discussion

Date: 12 August 2025

Time: 11:00–13:00

Venue: Noordoewer Guesthouse, Noordoewer

Participants: A total of seven participants attended the meeting, including representatives of the Bondelswarts Traditional Authority and regional youth representatives.

The Bondelswarts Traditional Authority Focus Group Discussion provided a platform for engagement on cultural heritage, access and land use, water resources, environmental health and safety, youth opportunities and potential community benefits.

The meeting was facilitated by Kutlo Modie (KP), with presentations and responses provided by Trevor Faber (KC) and Amelia Briel (KP). Meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

The discussion reflected particular interest in the protection of graves and other culturally significant sites, together with access and land use considerations. Stakeholders also raised questions regarding water resources and groundwater use, environmental health and safety, and mine closure and rehabilitation.

Employment, youth skills development and potential community benefits were also important areas of discussion. Participants emphasised the importance of continued engagement as the ESIA progressed, particularly on Project-related matters affecting cultural heritage and surrounding communities.

The discussion helped identify cultural heritage, access and land use, environmental and socio-economic matters requiring further consideration during the ESIA process.

The detailed meeting record, including the meeting minutes, attendance register and photographic record, is provided in Appendix C.2.6. The complete record of issues, concerns and responses is provided in the Issues and Concerns Register in Appendix C.3.

Photographs from the Bondelswarts Traditional Authority Focus Group Discussion are provided in Figure 9.



Figure 9: Bondelswarts Traditional Authority Focus Group Discussion

5.3.7 Constituency Development Committee Focus Group Discussion

Date: 12 August 2025

Time: 14:00–15:30

Venue: Noordoewer Guesthouse, Noordoewer

Participants: A total of 11 participants attended the meeting, including representatives of the Karasburg West CDC and associated community stakeholders.

The CDC Focus Group Discussion provided a platform for engagement on local development priorities and the potential implications of the proposed Project for infrastructure, service delivery, employment, local procurement and social development.

The meeting was facilitated by Kutlo Modie (KP), with presentations and responses provided by Trevor Faber (KC) and Amelia Briel (KP). Meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

The discussion reflected concern about the capacity of existing infrastructure, housing and social services to accommodate potential Project-related growth. At the same time, participants emphasised the importance of ensuring that local communities and businesses are able to access employment, procurement and SME opportunities associated with the proposed Project.

Youth skills development and exposure to career opportunities in the mining sector were also important areas of discussion. Participants further emphasised the need for transparent communication and continued coordination between the Project Team, government institutions, constituency structures and local stakeholders as the ESIA and Project planning progressed.

The discussion helped identify local infrastructure, employment, procurement and social development priorities requiring further consideration during the ESIA process.

The detailed meeting record, including the meeting minutes, attendance register and photographic record, is provided in Appendix C.2.7. The complete record of issues, concerns and responses is provided in the Issues and Concerns Register in Appendix C.3.

Photographs from the Constituency Development Committee Focus Group Discussion are provided in Figure 10.



Figure 10: Constituency Development Committee Focus Group Discussion

5.3.8 Noordoewer Community Representative Committee Focus Group Discussion

Date: 12 August 2025

Time: 17:30–18:30

Venue: Noordoewer Guesthouse, Noordoewer

Participants: A total of five participants attended the discussion, including members of the Noordoewer Community Representative Committee (NCRC) and local community representatives.

The NCRC Focus Group Discussion provided a platform for direct engagement with local community representatives on employment, living costs, communication and social infrastructure matters affecting residents of Noordoewer.

The meeting was facilitated by Kutlo Modie (KP), with presentations and responses provided by Trevor Faber (KC) and Amelia Briel (KP). Meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

The discussion reflected concern about whether local residents would be able to access employment opportunities associated with the proposed Project and whether Project-related development could place further pressure on rental and living costs in Noordoewer. Participants also highlighted the importance of social infrastructure and community services as the area develops.

Transparent and accessible communication emerged as another important priority. Participants emphasised the need for local residents to remain informed and for engagement to continue as the ESIA and Project planning progressed.

The discussion helped identify employment, cost-of-living, social infrastructure and communication matters requiring further consideration during the ESIA process.

The detailed meeting record, including the meeting minutes, attendance register and photographic record, is provided in Appendix C.2.8. The complete record of issues, concerns and responses is provided in the Issues and Concerns Register in Appendix C.3.

Photographs from the Noordoewer Community Representative Committee Focus Group Discussion are provided in Figure 11.

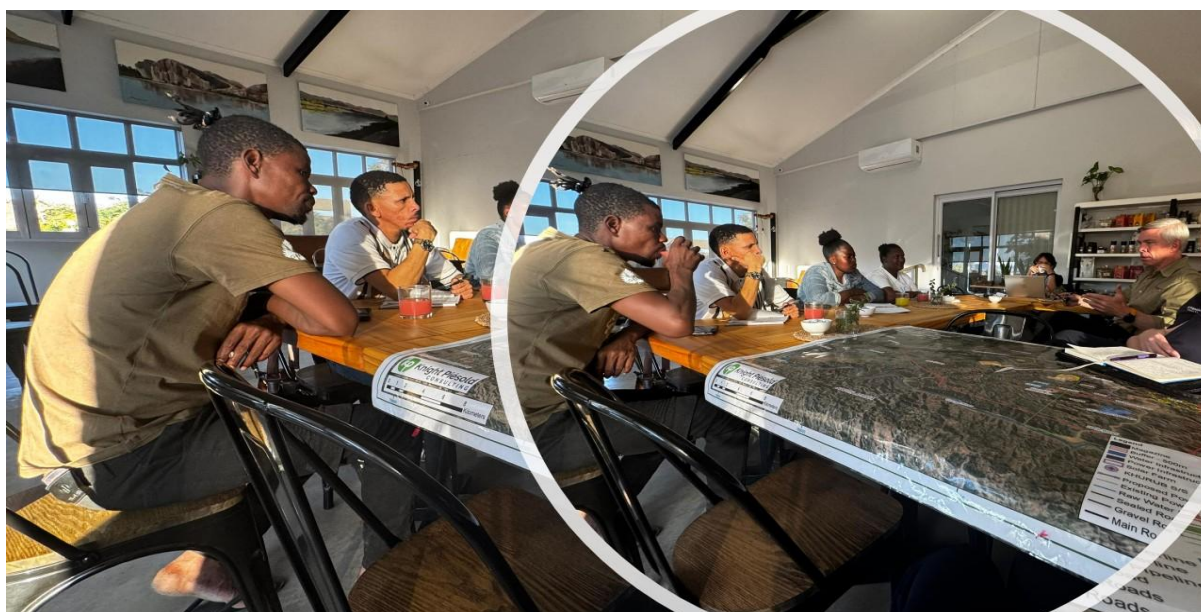


Figure 11: Noordoewer Community Representative Committee Focus Group Discussion

5.3.9 Regional Authority Meeting, Keetmanshoop

Date: 13 August 2025

Time: 10:00–12:00

Venue: !Ikharas Regional Council Offices, Keetmanshoop

Participants: Representatives of the !Ikharas Regional Council, government ministries, state-owned enterprises, regulatory authorities and other regional stakeholders.

Participants included representatives of the Ministry of Industries, Mines and Energy (MIME), Ministry of Agriculture, Water and Land Reform (MAFWLR), NamWater, Namibia Revenue Agency (NamRA), Ministry of Education, Arts and Culture, Ministry of Health and Social Services, Ministry of Information and Communication Technology (MICT), Ministry of Environment, Forestry and Tourism (MEFT), and other regional stakeholders.

The Regional Authority Meeting provided a platform for regional stakeholders to consider the proposed Haib Copper Project in relation to wider development priorities, infrastructure requirements and environmental and social conditions within the !Ikharas Region. The meeting was facilitated by the Chief Regional Officer (CRO) of the !Ikharas Regional Council, with presentations and responses provided by Charles Creasy (KC), Trevor Faber (KC) and Amelia Briel (KP). Meeting notes were recorded by Heidri Nel (UDA).

Discussion Summary

Water security emerged as a central concern, particularly in relation to existing and future irrigation development, climate change, drought conditions, downstream environmental flows and the potential cumulative effects of increasing regional water demand.

The discussion also considered infrastructure planning and durability, transport and export logistics, employment and skills development, local value addition, and potential environmental, health, social and cultural impacts. Stakeholders emphasised the importance of considering the proposed Project within the wider regional context rather than in isolation.

The meeting highlighted the need to align Project planning with regional development priorities while considering water security, agricultural sustainability, downstream ecosystems and the broader infrastructure and social pressures that may accompany large-scale mining development.

The detailed meeting record, including the meeting minutes, attendance register and photographic record, is provided in Appendix C.2.9. The complete record of issues, comments and responses is provided in the Issues and Concerns Register in Appendix C.3.

Photographs from the Regional Authority Meeting are provided in Figure 12



Figure 12: Regional Authority Meeting, Keetmanshoop

5.4 WRITTEN SUBMISSIONS AND CORRESPONDENCE

No substantive written submissions specifically relating to the Haib Copper Mine ESIA were received during the Scoping Phase following the August 2025 stakeholder engagement activities.

Written submissions were, however, received during the broader consultation process in relation to the separate environmental assessment for the associated water abstraction, supply and storage infrastructure. These submissions focused primarily on proposed water abstraction from the Orange River, existing and future water allocations, cumulative water demand, downstream users, environmental flows, alternative water supply options, and wider regional and transboundary water resource considerations.

Although these submissions were formally directed at the separate water infrastructure assessment, they are relevant to the broader Haib Copper Project due to the functional relationship between the proposed mine and its associated water supply infrastructure. For completeness and transparency, the comments and corresponding responses are therefore included as Appendix C.3. Their inclusion does not imply that the submissions were received specifically in response to the Haib Copper Mine ESIA Scoping Phase; rather, they provide a consolidated record of water-related stakeholder issues raised in relation to associated project infrastructure.

5.5 CROSS-CUTTING ISSUES AND CONCERNS

Several recurring issues and concerns emerged across the Scoping Phase stakeholder engagement activities and written submissions. While the emphasis varied between stakeholder groups, common themes were raised across multiple meetings and engagement platforms.

Local employment and recruitment, skills development and training, and water-related matters were among the most consistently raised themes. These concerns reflected strong stakeholder interest in potential economic opportunities associated with the proposed Project, together with expectations regarding access to employment, training and longer-term local benefits.

Water-related concerns were particularly prominent among agricultural stakeholders, regional authorities and stakeholders who provided written submissions. These concerns extended beyond the Project's direct water requirements to include water security, irrigation demand, downstream users, environmental flows, drought and climate variability, and the potential cumulative effects of increasing demand on the Orange River system.

The frequency with which the principal themes were raised across the Scoping Phase consultation process is summarised in Figure 13.

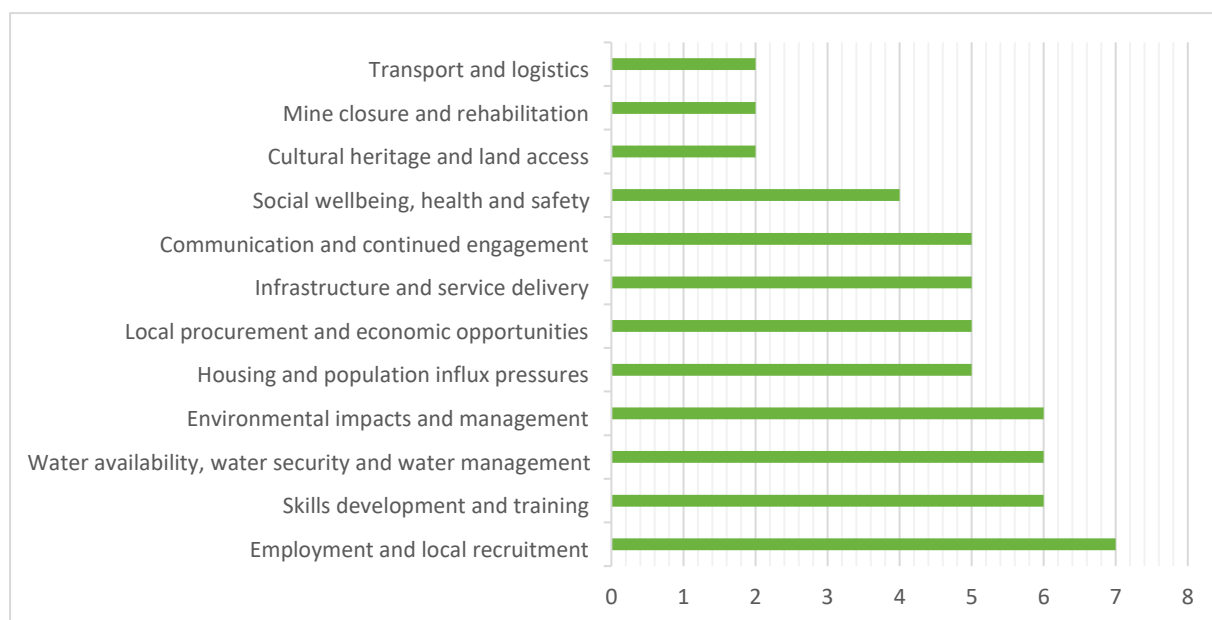


Figure 13: Frequency of Cross-Cutting Issues and Concerns Raised during the Scoping Phase

Note: The frequency reflects the number of stakeholder engagement activities and written submission sources in which each theme was raised. It does not represent the number of individual comments received or indicate the environmental or social significance of an issue.

Other recurring themes included pressure on housing and social infrastructure, local procurement and SME participation, transport and infrastructure requirements, cultural heritage, environmental protection, and the need for transparent and continued communication.

Overall, the consultation process identified both Project-specific concerns and broader regional and community matters. While not all issues could be addressed through the ESIA or by the Project alone, the engagement process helped identify matters requiring further specialist assessment, Project-level mitigation or continued engagement, as well as matters extending beyond the mandate of the ESIA

process. The issues identified during the Scoping Phase informed the scope of specialist investigations and formed the basis for stakeholder engagement during the Impact Assessment Phase.

6. IMPACT ASSESSMENT PHASE STAKEHOLDER ENGAGEMENT ACTIVITIES

During the Impact Assessment Phase, stakeholder engagement was undertaken following the separation of the environmental assessment processes for the proposed Haib Copper Project and the associated Orange River water abstraction project. While consultation activities continued to be coordinated where appropriate, the proposed water abstraction, conveyance and storage infrastructure was assessed through a separate EIA undertaken on behalf of NamWater.

The consultation programme focused on presenting the findings of the NamWater EIA and obtaining stakeholder feedback on the proposed water abstraction, associated infrastructure, identified impacts and proposed mitigation and management measures.

6.1 OBJECTIVE OF THE IMPACT ASSESSMENT PHASE ENGAGEMENT

The primary objective of the Impact Assessment Phase stakeholder engagement process was to present the findings of the environmental assessment processes and obtain stakeholder feedback on the identified impacts and proposed mitigation and management measures.

The engagement process was undertaken to:

- inform stakeholders, including farmers, downstream water users and other I&APs, about the proposed Orange River water abstraction, conveyance and storage infrastructure;
- present the findings of the NamWater EIA;
- present the identified environmental and social impacts and proposed mitigation and management measures;
- facilitate discussion on the proposed water abstraction, water availability, downstream water users and water resource management; and
- obtain stakeholder feedback to inform the finalisation of the EIA and EMP.

The Impact Assessment Phase stakeholder feedback programme comprised:

- one (1) National Authority Stakeholder Feedback Meeting held in Windhoek;
- one (1) Bondelswarts Traditional Authority Feedback Meeting;
- one (1) Open House information session;
- one (1) Regional Authority Feedback Meeting;
- one (1) Community Feedback Meeting; and
- four (4) Focus Group Discussions (FGDs) with women, farmers, business and tourism stakeholders, the Constituency Development Committee and the Noordoewer Community Representative Committee.

In total, nine (9) direct stakeholder feedback activities were undertaken during the Impact Assessment Phase.

6.2 ENGAGEMENT SCHEDULE

Table 10 provides an overview of the stakeholder engagement activities undertaken during the Impact Assessment Phase. The meetings focused on presenting the findings of the NamWater EIA, obtaining stakeholder feedback on the proposed Orange River water abstraction, conveyance and storage infrastructure, and, where appropriate, explaining its relationship with the parallel Haib Copper Project ESIA.

Table 10: Impact Assessment Phase Stakeholder Engagement Schedule

Type of Engagement	Date and Time	Venue
National Authority Stakeholder Feedback Meeting	20 April 2026, 09:00 – 11:30	Opera House, Windhoek
Bondelswarts Traditional Authority Feedback Meeting	21 April 2026, 10:00 – 12:30	Karasburg East Constituency Office
Open House	22 April 2026, 08:00 – 13:00	EHW Baard Primary School, Noordoewer
Regional Authority Feedback Meeting	22 April 2026, 14:00 – 16:00	Noordoewer Guesthouse, Noordoewer
Community Feedback Meeting	22 April 2026, 17:30 – 19:30	EHW Baard Primary School, Noordoewer
Women's Feedback Meeting	22 April 2026, 19:30 – 20:10	EHW Baard Primary School, Noordoewer
Farmers, Business and Tourism Sector Feedback Meeting	23 April 2026, 09:00 – 10:30	Noordoewer Guesthouse, Noordoewer
Constituency Development Committee Feedback Meeting	23 April 2026, 14:00 – 16:00	Noordoewer Guesthouse, Noordoewer
Noordoewer Community Representative Committee Feedback Meeting	23 April 2026, 16:30 – 17:00	Noordoewer Guesthouse, Noordoewer

6.3 MEETING AGENDA AND INFORMATION SHARING

Stakeholder meetings commenced with a presentation outlining the proposed Orange River water abstraction, conveyance and storage infrastructure, the findings of the NamWater EIA and the proposed mitigation and management measures. The relationship between the proposed water infrastructure and the Haib Copper Project was also explained, after which stakeholders were invited to ask questions and provide comments.

The presentations covered the following topics:

- overview of the proposed Orange River water abstraction, conveyance and storage infrastructure;

- purpose and scope of the NamWater EIA and Environmental Clearance Certificate (ECC) application;
- findings of the specialist studies relevant to the proposed water infrastructure;
- identified environmental and social impacts;
- proposed mitigation and management measures;
- water resource considerations, including downstream water users and monitoring;
- relationship between the proposed water infrastructure and the Haib Copper Project; and
- opportunities to review the Draft EIA and provide comments.

The stakeholder feedback meetings were facilitated by Mr Ernst Simon of Urban Dynamics Africa (UDA), with Ms Heidri Nel responsible for notetaking during the meetings. Mr Robert Zipplies and Mr Lionel Coetzee of Koryx Copper provided Project-related input and assisted in responding to stakeholder questions.

The presentations were delivered in English, with questions and discussions facilitated in both English and Afrikaans where required. Copies of the Impact Assessment Phase presentations are provided in Appendix D.1.

During the Open House, information materials were displayed to facilitate informal engagement between stakeholders and the Project Team. Information materials relating to the proposed Orange River water abstraction, conveyance and storage infrastructure, the findings of the NamWater EIA and proposed mitigation measures were displayed. Information on the relationship between the proposed water infrastructure and the Haib Copper Project was also available to stakeholders.

The stakeholder feedback meetings constituted the primary platforms for direct consultation during the Impact Assessment Phase. With the exception of the Open House, the meetings generally followed a structured agenda comprising:

1. Welcome and introductions
2. Overview of the proposed Orange River water abstraction project
3. Presentation of the NamWater EIA findings
4. Overview of the relationship between the proposed water infrastructure and the Haib Copper Project
5. Discussion of identified impacts and proposed mitigation measures
6. Open discussion and question-and-answer session
7. Recording of stakeholder comments, questions and concerns

The detailed meeting records, including meeting minutes, attendance registers and photographic records, are provided in Appendix D.2. The issues, concerns and responses arising from the Impact Assessment Phase consultation process are provided in the meeting-specific Issues and Concerns Registers in Appendix D.3

6.3.1 NATIONAL AUTHORITY STAKEHOLDER FEEDBACK MEETING, WINDHOEK

Date: 20 April 2026

Time: 09:00–11:30

Venue: Opera House, Windhoek

Participants: Representatives of national authorities, state-owned enterprises, regulatory bodies and other key stakeholders attended the meeting. A total of 13 participants were present.

The National Authority Stakeholder Feedback Meeting marked the commencement of the Impact Assessment Phase consultation programme and provided national authorities with an opportunity to review the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction, conveyance and storage infrastructure. The meeting also explained the relationship between the proposed water infrastructure and the Haib Copper Project and invited stakeholder feedback on the environmental assessment findings and proposed mitigation measures.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the findings of the environmental assessment, while representatives of KC provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

The discussion focused on regulatory, institutional and technical aspects of the proposed water infrastructure. Stakeholders sought clarification on the proposed water abstraction strategy, future operational responsibilities, environmental authorisation requirements and the integration of the proposed infrastructure within the broader regional water supply network.

Particular attention was given to the legislative and permitting requirements that will follow the Environmental Clearance Certificate (ECC), including water abstraction licensing, associated statutory approvals and the roles of NamWater and KC during construction and operation. The Project Team explained that NamWater will remain the holder of the Environmental Clearance Certificate and the future operator of the completed infrastructure, while implementation arrangements will be governed through the relevant agreements and subsequent permitting processes.

Stakeholders also requested additional information on the proposed abstraction methodology, abstraction controls and long-term water resource management. KP explained that the proposed abstraction strategy is based on a surplus-flow approach, supported by an off-channel storage dam and a Water Abstraction Protocol designed to protect environmental flow requirements and downstream water users. It was further noted that hydrological modelling, flow monitoring and operational controls have been incorporated into the EIA to support sustainable management of the Orange River water resource.

Overall, stakeholders supported continued engagement with national authorities throughout the environmental assessment process and emphasised the importance of regulatory coordination, transparent governance and effective long-term management of the proposed water infrastructure.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the National Authority Stakeholder Feedback Meeting are presented in Figure 14.



Figure 14: National Authority Stakeholder Feedback Meeting

6.3.2 Bondelswarts Traditional Authority Feedback Meeting

Date: 21 April 2026

Time: 10:00–12:30

Venue: Karasburg East Constituency Office

Participants: Four representatives of the Bondelswarts Traditional Authority and one representative of the Nama Traditional Leaders Association attended the meeting, together with representatives of the Karasburg East Constituency and members of the Project Team.

The Bondelswarts Traditional Authority Feedback Meeting provided an opportunity for representatives of the Traditional Authority to review the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction, conveyance and storage infrastructure and to provide comments on the potential environmental and social impacts of the proposed development. The relationship between the proposed water infrastructure and the Haib Copper Project was also explained.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the environmental assessment findings, while representatives of KC provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

The discussion focused on land ownership, historical occupation and the protection of cultural heritage resources within the broader project area. Representatives of the Traditional Authority emphasised the importance of recognising areas of cultural significance, including graves and sites associated with historical Nama occupation, and highlighted the need for continued consultation should any heritage resources be identified during project implementation.

Participants also stressed the importance of maintaining transparent communication with the Traditional Authority throughout the environmental assessment and implementation process. Requests were made for environmental assessment information to be made readily accessible within the Karasburg area to enable affected communities to remain informed and participate meaningfully in the decision-making process.

KP confirmed that heritage considerations had been assessed as part of the environmental studies and that appropriate mitigation measures, including chance-find procedures and consultation with the relevant authorities where required, have been incorporated into the EIA and Environmental Management Plan. Stakeholders were informed that the Draft EIA documentation relating to the proposed water abstraction infrastructure would be made available for public review.

Overall, the meeting reinforced the importance of continued engagement with the Bondelswarts Traditional Authority and ensuring that cultural heritage considerations and stakeholder input remain integrated into the environmental assessment and future implementation of the proposed water infrastructure.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the Bondelswarts Traditional Authority Feedback Meeting are presented in Figure 15.



Figure 15: Bondelswarts Traditional Authority Feedback Meeting

6.3.3 Open House

Date: 22 April 2026

Time: 08:00–13:00

Venue: EHW Baard Primary School, Noordoewer

Participants: Three members of the public attended the Open House.

The Open House provided members of the public with an informal opportunity to engage directly with the Project Team, obtain information on the proposed Orange River water abstraction, conveyance and storage infrastructure, and review the findings of the NamWater Environmental Impact Assessment (EIA). Information was also provided on the relationship between the proposed water infrastructure and the Haib Copper Project and the respective environmental assessment processes.

The session was facilitated by Mr Ernst Simon (UDA) and Mr Joseph Mülders (KP), who engaged directly with attendees and responded to questions relating to the proposed water infrastructure, the environmental assessment process, identified impacts and proposed mitigation measures. Representatives of KC were also available to provide project-related information where required.

Stakeholder Feedback

The informal format enabled attendees to review project information at their own pace and discuss specific aspects of the proposed development directly with members of the Project Team. Information displayed during the session included the proposed abstraction infrastructure, pipeline alignment, environmental assessment findings, proposed mitigation measures and the ECC application process.

No formal comments, objections or project-specific concerns relating to the proposed water abstraction infrastructure were recorded during the Open House. Nevertheless, the session provided an additional opportunity for information sharing and allowed members of the public to clarify aspects of the proposed development outside the formal meeting programme.

The attendance register and photographic record are provided in Appendix D.2.

Photographs from the Open House are presented in Figure 16.



Figure 16: Open House, Feedback Section

6.3.4 Regional Authority Feedback Meeting

Date: 22 April 2026

Time: 14:00–16:00

Venue: Noordoewer Guesthouse, Noordoewer

Participants: Fourteen stakeholder representatives attended the meeting, comprising representatives of the IlKharas Regional Council, the Ministry of Health and Social Services, the Ministry of Agriculture, Water and Land Reform, the Ministry of Education, local authorities and other regional institutions, together with representatives of KC, KP and UDA. Refer to the attached attendance register. Personal contact details and stakeholder names have been redacted from the public version of this report.

The Regional Authority Feedback Meeting provided regional authorities with an opportunity to review the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction, conveyance and storage infrastructure and to discuss the potential implications of the proposed development for regional planning, infrastructure and service provision.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the findings of the environmental assessment, while representatives of KC provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

The discussion centred on the proposed water abstraction infrastructure and its integration with regional planning initiatives and existing infrastructure. Stakeholders highlighted the importance of ensuring that the development is aligned with regional development objectives and that coordination is maintained between NamWater, regional authorities and other government institutions throughout project implementation.

Participants sought clarification on the environmental authorisation process, the implementation programme and the proposed management of the water infrastructure. Questions were also raised regarding future communication with regional authorities and mechanisms for keeping stakeholders informed as the project progresses. The Project Team confirmed that stakeholder engagement would continue throughout the environmental assessment process and that relevant authorities would be consulted as additional permits and approvals are pursued.

The discussion also emphasised the importance of transparent information sharing and continued collaboration between the Project Team and regional institutions to support effective environmental management and regulatory compliance. KP explained that the EMP includes monitoring and management measures to guide implementation and ensure that environmental commitments are effectively monitored throughout the project lifecycle.

Overall, the meeting reinforced the importance of coordinated planning, ongoing stakeholder engagement and effective communication between NamWater, regional authorities and other government institutions during the implementation of the proposed water infrastructure.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the Regional Authority Feedback Meeting are presented in Figure 17.



Figure 17: Regional Authority Stakeholder Feedback Meeting

6.3.5 Main Community Feedback Meeting

Date: 22 April 2026

Time: 17:30–19:30

Venue: EHW Baard Primary School, Noordoewer

Participants: Members of the Noordoewer community and the Project Team. A total of 24 participants attended the meeting.

The Main Community Feedback Meeting provided local residents and I&APs with an opportunity to review the findings of the NamWater EIA for the proposed Orange River water abstraction, conveyance and storage infrastructure and to provide comments on the potential environmental and social impacts of the proposed development. The relationship between the proposed water infrastructure and the Haib Copper Project was also explained to distinguish the two environmental assessment processes.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the environmental assessment findings, while Mr Robert Zipplies and Mr Lionel Coetzee (KC) provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

The discussion centred on the proposed water abstraction project, the environmental assessment process and opportunities for public participation. Community members sought clarification on the relationship between the NamWater EIA and the Haib Copper Project, and the Project Team explained that the two developments are being assessed through separate environmental assessment processes, each requiring its own environmental authorisation.

Stakeholders requested information on where and when the Draft NamWater EIA Report would be available for public review and how comments could be submitted. The Project Team confirmed the public review period and advised that the report would be available electronically and at designated public access points. Community members also emphasised the importance of using accessible communication channels, including WhatsApp, local radio and social media, and requested that information continue to be made available in languages commonly used within the community to encourage broader participation.

Questions were also raised regarding the potential environmental impacts of the proposed water infrastructure, including water quality, pollution prevention and environmental monitoring. Joseph Mülders (KP) explained that these matters had been assessed through specialist studies and that mitigation measures and monitoring requirements have been incorporated into the EIA and Environmental Management Plan to minimise potential impacts during construction and operation. Stakeholders welcomed the opportunity to review the Draft EIA and encouraged continued engagement throughout the environmental assessment process.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the Main Community Feedback Meeting are presented in Figure 18.



Figure 18: Community Feedback Meeting

6.3.6 Women's Breakaway Feedback Session

Date: 22 April 2026

Time: Following the Main Community Feedback Meeting

Venue: EHW Baard Primary School, Noordoewer

Participants: Eight women from the Noordoewer community participated in the breakaway discussion following the Main Community Feedback Meeting.

The Women's Breakaway Feedback Session provided a dedicated platform for women from the local community to discuss issues of particular relevance to them following the presentation of the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River Water Abstraction, Conveyance and Storage Infrastructure. The discussion also provided an opportunity to clarify the relationship between the proposed water infrastructure and the Haib Copper Project.

The session was facilitated by Ms Heidri Nel (UDA), with technical input and responses provided by representatives of KC. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

Participants emphasised the importance of ensuring that local communities remain informed throughout the implementation of the proposed water infrastructure and that communication remains accessible to all members of the community. The discussion highlighted the need for clear communication channels through which community members could obtain project information and raise questions or concerns.

Participants also stressed the importance of transparent and accessible grievance mechanisms to enable community members to report concerns that may arise during construction and operation. The Project Team confirmed that appropriate grievance procedures would form part of the Environmental Management Plan and that these mechanisms would be communicated to affected stakeholders.

The discussion further highlighted broader community development matters, including opportunities for women to participate in project-related employment where appropriate, support for vulnerable groups and continued engagement with local communities throughout project implementation. Participants encouraged ongoing communication and regular stakeholder engagement to ensure that community concerns continue to be considered as the project progresses.

Overall, the session reinforced the importance of transparent communication, accessible grievance mechanisms and continued engagement with women and other community members throughout the implementation of the proposed water infrastructure.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the Women's Feedback session presented in Figure 19.



Figure 19: Woman's Group

6.3.7 Farmers, Business and Tourism Sector, Focus Group Discussion

Date: 23 April 2026

Time: 09:00–11:30

Venue: Noordoewer Guesthouse, Noordoewer

Participants: Eighteen participants attended the meeting, comprising representatives of the farming sector, local businesses, tourism operators, other Interested and Affected Parties (I&APs) and members of the Project Team.

The Farmers, Business and Tourism Sectors Focus Group Discussion provided stakeholders with an opportunity to review the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction, conveyance and storage infrastructure and to discuss matters of particular relevance to agricultural producers, businesses and other water users. Given the dependence of the agricultural sector on the Orange River, much of the discussion focused on water resource management and the potential implications of the proposed abstraction.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the environmental assessment findings and responded to technical questions, while representatives of KC provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

Water availability and the long-term sustainability of the proposed abstraction were the principal issues discussed. Stakeholders sought clarification on the proposed abstraction strategy, including the surplus-

flow approach, abstraction triggers, protection of environmental flow requirements and the potential implications for downstream water users during periods of low river flow and drought. Questions were also raised regarding cumulative water demand, future abstraction requirements and the role of NamWater in managing the water supply system.

Discussion also focused on the technical design of the proposed water infrastructure. Participants requested additional information on the off-channel storage dam, abstraction works, hydrological modelling, flow monitoring, abstraction protocols and the measures proposed to protect the ecological functioning of the Orange River. Joseph Mülders (KP) explained that the project design is supported by specialist hydrological investigations and that abstraction would be undertaken in accordance with a Water Abstraction Protocol supported by operational controls, monitoring programmes and environmental management measures designed to minimise impacts on downstream users and the river system.

Environmental management formed another important component of the discussion. Stakeholders raised questions regarding groundwater protection, potential seepage from the storage dam, water quality, pollution prevention, biodiversity protection and the long-term environmental monitoring programme. The Project Team explained that these matters had been assessed through specialist investigations and that the Environmental Management Plan includes monitoring, mitigation and adaptive management measures to address identified risks throughout the construction and operational phases.

Participants also emphasised the importance of transparency and ongoing engagement. Farmers requested continued access to specialist information and monitoring results and encouraged NamWater to maintain regular communication with downstream water users and other affected stakeholders as the project progresses. The Project Team confirmed that stakeholder engagement would continue throughout the environmental authorisation process and subsequent implementation of the project.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the Farmers, Business and Tourism Sectors Focus Group Discussion are provided in Figure 20.



Figure 20: Farmers, Business and Tourism Sectors Focus Group Meeting

6.3.8 Constituency Development Committee Feedback Meeting

Date: 23 April 2026

Time: 14:00–16:00

Venue: Noordoewer Guesthouse, Noordoewer

Participants: Six members of the Constituency Development Committee, representatives of the IlKharas Regional Council, local institutions and members of the Project Team attended the meeting.

The Constituency Development Committee (CDC) Feedback Meeting provided local government representatives with an opportunity to review the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction, conveyance and storage infrastructure and to discuss matters relating to the implementation and operation of the proposed water supply scheme.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the environmental assessment findings and responded to technical questions, while representatives of KC provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

Stakeholders sought clarification on the proposed off-channel storage dam, the abstraction infrastructure and the intended use of water abstracted from the Orange River. Questions were raised regarding the implementation status of the proposed storage dam and whether water supplied through the system would be suitable for domestic use.

Joseph Mülders (KP) explained that the proposed storage dam has not yet been constructed and forms part of the proposed infrastructure assessed through the EIA. It was further explained that water abstracted from the Orange River would require appropriate treatment before it could be supplied as potable water and that the infrastructure is intended to provide a reliable raw water supply to support the proposed development.

The discussion also highlighted the importance of maintaining effective communication between NamWater, local authorities and surrounding communities throughout the implementation of the project. Stakeholders supported continued engagement and encouraged the Project Team to provide regular updates as the project progresses through the regulatory approval process.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the CDC Feedback Meeting are provided in Figure 21



Figure 21: Constituency Development Committee Feedback Meeting

6.3.9 Noordoewer Community Representative Committee Feedback Meeting

Date: 23 April 2026

Time: 14:00–16:00

Venue: Noordoewer Guesthouse, Noordoewer

Participants: Four representatives of local community structures attended the meeting, including representatives of the Noordoewer Community Representative Committee (NCRC) and the Noordoewer Residents Development Committee (NRDC), together with members of the Project Team.

The Noordoewer Community Representative Committee (NCRC) Feedback Meeting provided an opportunity for community representatives to review the findings of the NamWater Environmental Impact Assessment (EIA) for the proposed Orange River water abstraction, conveyance and storage infrastructure and to discuss matters of particular importance to the Noordoewer community.

The meeting was facilitated by Mr Ernst Simon (UDA). Mr Joseph Mülders (KP) presented the environmental assessment findings and responded to technical questions, while representatives of KC provided project-related input where required. Meeting notes were recorded by Ms Heidri Nel (UDA).

Stakeholder Feedback

Community representatives sought clarification on the environmental management measures proposed for the water infrastructure and the mechanisms that would be implemented to protect the Orange River and the surrounding environment during construction and operation. Questions focused on environmental monitoring, pollution prevention and the management of potential environmental risks associated with the proposed infrastructure. Joseph Mülders (KP) explained that these aspects had been assessed through specialist studies and incorporated into the Environmental Management Plan, which includes monitoring programmes, mitigation measures and adaptive management procedures.

Participants also emphasised the importance of maintaining transparent communication with local communities throughout the project lifecycle. Continued access to project information, effective grievance mechanisms and regular stakeholder engagement were identified as important for ensuring that community concerns can be addressed promptly and that stakeholders remain informed as the project progresses. The Project Team confirmed that stakeholder engagement would continue throughout the environmental authorisation process and subsequent implementation of the proposed water infrastructure.

Overall, the meeting reinforced the value of maintaining open communication between NamWater, the Project Team and the Noordoewer community to support the effective implementation and long-term environmental management of the proposed water infrastructure.

The meeting record and attendance register are provided in Appendix D.2, while the issues and comments raised, together with the Project Team responses, are provided in Appendix F.

Photographs from the Noordoewer Community Representative Committee Feedback Meeting are provided in Figure 22.



Figure 22: Noordoewer Community Representative Committee Feedback Meeting

7. DRAFT EIA REVIEW AND COMMENT PERIOD

Following the Impact Assessment Phase stakeholder engagement activities, the Draft EIA and EMP for the proposed Orange River Water Abstraction, Conveyance and Storage Infrastructure were made available for public review and comment from 6 May 2026.

Registered I&APs and relevant stakeholders were notified of the availability of the Draft EIA and EMP and invited to review the documentation and submit comments. Electronic copies of the documents were distributed to registered stakeholders, while hard copies were made available at the Noordoewer Settlement Office, Karasburg East Constituency Office and IlKharas Regional Council Office in Keetmanshoop.

During the review period, requests were received from stakeholders for additional time to review the assessment documentation and prepare their submissions. The review period was accordingly extended to 9 June 2026, providing stakeholders with additional time to review the documentation and submit comments.

Following consideration of the comments received during the initial review process, the EIA and EMP were revised and Revision B was made available for a further stakeholder review period from 6 August to 21 August 2026. This additional review period provided stakeholders with an opportunity to consider the revised documentation and submit further comments prior to finalisation of the EIA and EMP.

As part of the further engagement undertaken during this period, a follow-up online meeting was held with farmers, business and tourism sector stakeholders on 12 August 2026. Further details of the meeting are provided in Section 7.1.

Comments received during the review periods and matters raised during the follow-up engagement were recorded and considered by the Project Team in finalising the EIA and EMP. The detailed comments and responses are provided in the Issues, Comments and Responses Register in Appendix F.

7.1 FARMERS, BUSINESS AND TOURISM SECTOR FOLLOW-UP MEETING

The follow-up meeting was held on 12 August 2026 from 10:00 to 12:20 via Microsoft Teams. It provided further clarification on the proposed water abstraction strategy, including water availability and assurance of supply, drought and low-flow conditions, the off-channel storage dam, the Water Abstraction Protocol (WAP), monitoring arrangements and the respective responsibilities of NamWater and Koryx Copper.

Stakeholders also emphasised the need for transparency and continued engagement with water users regarding implementation of the WAP. At the close of the meeting, stakeholders were reminded that Revision B remained available for comment until 21 August 2026. Comments received were considered in the preparation of Revision C for submission to the relevant authorities.

8. KEY FINDINGS FROM THE IMPACT ASSESSMENT PHASE ENGAGEMENT

The Impact Assessment Phase engagement provided further insight into the issues and concerns raised by stakeholders in relation to the proposed Orange River Water Abstraction, Conveyance and Storage Infrastructure. While a number of these matters had initially been identified during the Scoping Phase, the availability of additional technical information during the Impact Assessment Phase allowed for more detailed discussion of the proposed abstraction scheme and its management.

The findings presented below reflect the issues raised across the stakeholder meetings, focus group discussions, written submissions and follow-up engagement undertaken during the Impact Assessment Phase. The principal issues are summarised in Table 10.

Table 11: Key Issues Raised During the Impact Assessment Phase

No.	Key Issue / Theme	Summary of Stakeholder Feedback
1	Water availability and security	Water availability remained a key concern, particularly in relation to existing and downstream water users. Stakeholders sought assurance that the proposed abstraction would not compromise existing water uses, particularly during drought and periods of low river flow.
2	Water Abstraction Protocol and abstraction controls	Stakeholders requested clarity on the Water Abstraction Protocol (WAP), including the conditions under which abstraction would be permitted or restricted, how the protocol would be implemented and monitored, and how compliance would be ensured. Transparency and accountability in the implementation of the WAP were emphasised.
3	Hydrology, river flows and water resource modelling	Questions were raised regarding hydrological and demand modelling, minimum river flows, environmental water requirements, drought scenarios, evaporation, existing water allocations and the reliability of available flow data. Stakeholders sought clarity on how these factors had been considered in determining the availability of water for the proposed abstraction.

No.	Key Issue / Theme	Summary of Stakeholder Feedback
4	Water abstraction, conveyance and storage infrastructure	Stakeholders requested further information on the proposed abstraction works, bulk water pipeline, off-channel storage dam, abstraction methodology and assurance of supply. Questions were also raised regarding the future ownership and operation of the infrastructure.
5	Drought and low-flow conditions	Stakeholders raised concerns regarding the operation of the proposed scheme during drought and prolonged low-flow conditions. Clarification was sought on the implications for abstraction and associated mine operations should sufficient water not be available from the Orange River or the off-channel storage dam.
6	Monitoring and management of abstraction	Stakeholders emphasised the need for reliable monitoring of river flows and abstraction volumes. Matters raised included the availability and reliability of gauging stations, abstraction records and access to information on actual water use to support management of the Lower Orange River system.
7	Environmental protection and water quality	Concerns were raised regarding the protection of surface water and groundwater resources, water quality, environmental flow requirements, biodiversity and riparian habitats. Stakeholders sought assurance that appropriate mitigation and monitoring measures would be implemented to protect the Orange River and associated environmental resources.
8	Existing and downstream water users	Farmers and other water users emphasised their dependence on the Orange River and the importance of safeguarding existing lawful water uses. Concerns related particularly to cumulative demand on the river system and the implications of additional abstraction during periods of water scarcity.
9	Governance and institutional responsibilities	Stakeholders sought clarity on the respective responsibilities of NamWater, Koryx Copper, MAWFLR and other relevant authorities in relation to water abstraction, licensing, infrastructure operation, monitoring and implementation of the EMP and WAP.
10	Communication, transparency and water-user engagement	Stakeholders emphasised the need for continued access to information on water availability, abstraction and implementation of the WAP. The need for an appropriate forum or platform through which water users, NamWater, the Project and relevant authorities could exchange information was also raised.
11	Regulatory compliance and implementation of management measures	Stakeholders sought assurance that the proposed abstraction would be undertaken in accordance with the applicable environmental and water-related approvals and that the mitigation, monitoring and management measures contained in the EMP would be implemented.

Water availability and security remained central to the discussions throughout the Impact Assessment Phase, with particular concern regarding the protection of existing and downstream water users during drought and low-flow conditions. As the assessment progressed, stakeholder attention increasingly focused on how abstraction would be controlled and monitored in practice, including the implementation of the WAP and the responsibilities of the respective parties.

The engagement also highlighted the importance of transparency and continued communication with water users regarding river conditions, abstraction and operation of the proposed scheme. The need for an appropriate mechanism for information sharing and continued engagement between water users, NamWater, the Project and relevant authorities was also identified. These matters were particularly

evident during the follow-up engagement, where stakeholders sought greater clarity on the practical implementation and monitoring of the WAP.

The issues raised throughout the Impact Assessment Phase were considered during finalisation of the EIA and EMP and, where applicable, informed the clarification of technical information and refinement of the proposed mitigation, monitoring and management measures. Detailed comments and corresponding Project Team responses are provided in the Issues, Comments and Responses Register in **Appendix F**.

9. CONCLUSION AND ONGOING ENGAGEMENT

The stakeholder engagement process undertaken for the proposed Orange River Water Abstraction, Conveyance and Storage Infrastructure formed an integral part of the EIA process. Government authorities, Traditional Authorities, local communities, landowners, water users, businesses and other I&APs were provided with opportunities to obtain information on the proposed project, raise concerns and provide input throughout the Scoping and Impact Assessment phases.

The engagement provided an important basis for understanding stakeholder concerns and ensuring that these were considered as the assessment progressed. The detailed record of comments received and corresponding Project Team responses is provided in the Issues, Comments and Responses Register in Appendix F.

The engagement process also highlighted the importance of maintaining communication with affected stakeholders and water users as the project progresses. Should the project receive the required environmental authorisations, further stakeholder engagement will be undertaken in accordance with the conditions of the ECC, applicable regulatory requirements and the stakeholder engagement and communication measures contained in the EMP.

Prepared:		Reviewed:	
	Heidi Bindemann-Nel		Joseph Mulders
	Stakeholders Specialist		Senior Environmental Scientist

Attachments:

- Appendix A – Stakeholder List
- Appendix B – Stakeholder Notification and Communication Materials
- Appendix C – Scoping Phase Stakeholder Engagement Records
- Appendix D – Impact Assessment Phase Stakeholder Engagement
- Appendix E – Written Stakeholder Correspondence
- Appendix F– Issues, Comments and Responses Register

APPENDIX A: STAKEHOLDERS LIST

Organisation	Location	Title	Source of Inclusion
Directorate of Forestry	Noordoewer	Mr	Engagement Meeting Attendance Register
MAFWLR	//Kharas Region	Mr.	Registered Stakeholder Database
MAFWLR	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
MAFWLR	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
MAWLR	Windhoek, Khomas	Mr	Registered Stakeholder Database
MAWLR	Windhoek, Khomas	Mr	Registered Stakeholder Database
MAWLR	Windhoek, Khomas	Ms	Registered Stakeholder Database
MAWLR	Windhoek, Khomas /	Mr	Registered Stakeholder Database
MAWLR Noordoewer office	Noordoewer	Mr.	Registered Stakeholder Database
MEFT	Windhoek, Khomas	Ms	Engagement Meeting Attendance Register
MEFT	Windhoek, Khomas	Ms	Engagement Meeting Attendance Register
MEFT	//Kharas Region	Mr.	Registered Stakeholder Database
MEFT-Forestry	Noordoewer	Mr	Engagement Meeting Attendance Register
MGEPSW	//Kharas Region	Ms.	Registered Stakeholder Database
MICT	//Kharas Region	Mr.	Registered Stakeholder Database
MIME	//Kharas Region	Mr.	Registered Stakeholder Database
Ministry of Agriculture, Fisheries,Water and Land Reform (MAFWLR)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Agriculture, Fisheries,Water and Land Reform (MAFWLR)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Agriculture, Fisheries,Water and Land Reform (MAFWLR)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Agriculture, Fisheries,Water and Land Reform (MAFWLR)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Environment, Forestry and Tourism (MEFT)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Environment, Forestry and Tourism (MEFT)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of Environment, Forestry and Tourism (MEFT)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of Environment, Forestry and Tourism (MEFT)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of Health and Social Services	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of Industries, Mines and Energy (MIME)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of Industries, Mines and Energy (MIME)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Industries, Mines and Energy (MIME)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Industries, Mines and Energy (MIME)	Windhoek, Khomas	Mr	Registered Stakeholder Database

Ministry of Industries, Mines and Energy (MIME)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of Industries, Mines and Energy (MIME)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Ministry of International Relations and Trade (MoIRT)	Windhoek, Khomas	Amb.	Registered Stakeholder Database
Ministry of Labour office	Noordoewer	Mr.	Registered Stakeholder Database
Ministry of Labour office	Keetmanshoop	Ms.	Registered Stakeholder Database
Ministry of Labour office	Keetmanshoop	Ms.	Registered Stakeholder Database
Ministry of Labour office	Noordoewer	Ms.	Registered Stakeholder Database
Ministry of Labour office	Keetmanshoop	Mr.	Registered Stakeholder Database
Ministry of Works and Transport (MWT)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Ministry of Works and Transport (MWT)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Namibian Heritage Council	Windhoek, Khomas	Ms	Registered Stakeholder Database
Namibian Police	Noordoewer GH	Ms	Engagement Meeting Attendance Register
Namibian Police	//Kharas Region	Ms.	Registered Stakeholder Database
Namibian Police	Noordoewer	Insp.	Registered Stakeholder Database
Noordoewer Immigration Office	Noordoewer	Mr.	Registered Stakeholder Database
Noordoewer Immigration office, Min Home Affairs	Noordoewer	Mr.	Registered Stakeholder Database
Office of the Attorney General	Windhoek, Khomas	Ms	Registered Stakeholder Database
Office of the President	//Kharas Region	Ms.	Registered Stakeholder Database
Office of the President	Windhoek, Khomas	Mr	Registered Stakeholder Database
//Kharas Regional Council	Keetmanshoop	Mr.	Registered Stakeholder Database
//Kharas Regional Council	Keetmanshoop	Mr.	Registered Stakeholder Database
//Kharas Regional Council	//Kharas Region	Mr.	Registered Stakeholder Database
//Kharas Regional Council	Keetmanshoop	Ms.	Registered Stakeholder Database
//Kharas Regional Council	//Kharas Region	Mr.	Registered Stakeholder Database
//Kharas Regional Council	//Kharas Region	Ms.	Registered Stakeholder Database
//Kharas Regional Council	Keetmanshoop	Mr.	Registered Stakeholder Database
//Kharas Regional Council	Noordoewer GH	Mr	Engagement Meeting Attendance Register
//Kharas Regional Council	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
//Kharas Regional Council	Noordoewer GH	Mr	Engagement Meeting Attendance Register

Karasburg West Constituency	Noordoewer	Hon.	Registered Stakeholder Database
NO Settlement Office	Noordoewer	Ms.	Registered Stakeholder Database
Noordoewer Settlement Office	Noordoewer	Mr.	Registered Stakeholder Database
Office of the Governor of //Kharas Regional	Keetmanshoop	Hon.	Registered Stakeholder Database
Office of the Governor of //Kharas Regional	Keetmanshoop	Ms.	Registered Stakeholder Database
Settlement Office	Noordoewer GH	Mr.	Engagement Meeting Attendance Register
Warmbad Settlement Office	Warmbad	Ms.	Registered Stakeholder Database
EHW Baard Primary School	Noordoewer	Ms.	Registered Stakeholder Database
EHW Baard Primary School	Noordoewer GH	Mr.	Engagement Meeting Attendance Register
EHW Baard Primary School	Noordoewer	Ms.	Registered Stakeholder Database
EHW Baard Primary School	Noordoewer GH	Ms.	Engagement Meeting Attendance Register
MoHSS Clinic	Noordoewer	Ms.	Registered Stakeholder Database
MoHSS Clinic	Noordoewer	Ms.	Registered Stakeholder Database
Noordoewer Junior Secondary School	Noordoewer	Mr.	Registered Stakeholder Database
Electricity Control Board (ECB)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Electricity Control Board (ECB)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Electricity Control Board (ECB)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Electricity Control Board (ECB)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
NSA	//Kharas Region	Mr.	Registered Stakeholder Database
NamPower	Windhoek, Khomas	Mr.	Registered Stakeholder Database
NamPower	Noordoewer BPS	Mr.	Engagement Meeting Attendance Register
NamPower	Windhoek, Khomas	Mr.	Registered Stakeholder Database
NamPower	//Kharas Region	Mr.	Registered Stakeholder Database
NamPower	Windhoek, Khomas	Mr.	Registered Stakeholder Database
NamPower	Windhoek, Khomas	Mr.	Registered Stakeholder Database
NamPower	Windhoek, Khomas	Mr.	Registered Stakeholder Database
NamPower	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Namibia Investment Promotion and Development Board (NIPDB)	Windhoek, Khomas	Ms.	Registered Stakeholder Database

Namibia Investment Promotion and Development Board (NIPDB)	Windhoek, Khomas	Dr.	Registered Stakeholder Database
Namibia Investment Promotion and Development Board (NIPDB)	Windhoek, Khomas	Ms.	Registered Stakeholder Database
Namibia Ports Authority (NamPort)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Namibia Revenue Agency (NamRA)	Windhoek, Khomas	Ms.	Registered Stakeholder Database
Namibia Revenue Agency (NamRA) – Customs	//Kharas Region	Mr.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Noordoewer	Mr.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Keetmanshoop	Ms.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Keetmanshoop	Ms.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	//Kharas Region	Mr.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Windhoek, Khomas	Ms.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Walvis Bay, Erongo	Mr.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Noordoewer	Ms.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
Namibia Water Corporation Ltd (NamWater)	Noordoewer BPS	Mr.	Engagement Meeting Attendance Register
Namibia Water Corporation Ltd (NamWater)	Noordoewer	Mr.	Registered Stakeholder Database
Namibian Association of CBNRM Support Organisations (NACSO)	Windhoek	Ms.	Registered Stakeholder Database
National Planning Commission (NPC)	Windhoek, Khomas	Mr.	Registered Stakeholder Database
National Planning Commission (NPC)	Windhoek, Khomas	Ms.	Registered Stakeholder Database
OWSSC	//Kharas Region	Ms.	Registered Stakeholder Database
Ombudsman	//Kharas Region	Mr.	Registered Stakeholder Database
RFA	//Kharas Region	Mr.	Registered Stakeholder Database
Roads Authority	Windhoek, Khomas	Ms.	Registered Stakeholder Database
Roads Authority	Noordoewer	Mrs.	Registered Stakeholder Database
Roads Authority	Windhoek, Khomas	Mr.	Registered Stakeholder Database

Urban Dynamics Arica (Pty) Ltd.
EIA Stakeholder Engagement Report:
NamWater EIA

Roads Authority	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Roads Authority	Windhoek, Khomas	Mr	Registered Stakeholder Database
Roads Authority	Windhoek, Khomas	Ms	Registered Stakeholder Database
TransNamib Ltd.	Windhoek, Khomas	Mr	Registered Stakeholder Database
TransNamib Ltd.	Windhoek, Khomas	Mr	Registered Stakeholder Database
NTLA	Karasburg, CO	Mr	Engagement Meeting Attendance Register
CDC Member	Noordoewer	Mr	Registered Stakeholder Database
CDC Member	Noordoewer	Mr	Registered Stakeholder Database
CDC Member	Noordoewer	Ms	Registered Stakeholder Database
CDC Member	Noordoewer	Mr	Registered Stakeholder Database
CDC Member	Noordoewer	Ms	Registered Stakeholder Database
CDC Member	Noordoewer	Mr	Registered Stakeholder Database
CDC Member	Noordoewer	Mr	Registered Stakeholder Database
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register

[illegible]

Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
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Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Ms	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Community Member	Noordoewer	Mr	Engagement Meeting Attendance Register
Karasburg West Consitutory	Karasburg	Hon.	Registered Stakeholder Database
Karasburg West Consitutory	Noordoewer	Ms.	Registered Stakeholder Database
ORASECOM	Windhoek, Khomas	Ms	Registered Stakeholder Database
ORASECOM	South Africa	Mr	Registered Stakeholder Database
Aussenkehr Village Foundation	Noordoewer	Ms	Registered Stakeholder Database
Canadian High Commission	Windhoek, Khomas	Mr	Registered Stakeholder Database
Canadian High Commission	Johannesburg	Mr	Registered Stakeholder Database
Canadian High Commission	Windhoek, Khomas	Mr	Registered Stakeholder Database
Canadian High Commission	Windhoek, Khomas	Mr	Registered Stakeholder Database
Canadian High Commission	Johannesburg	Mr	Registered Stakeholder Database

Chamber of Mines of Namibia	Windhoek, Khomas	Mr	Registered Stakeholder Database
Chamber of Mines of Namibia	Windhoek, Khomas	Ms	Registered Stakeholder Database
Chamber of Mines of Namibia	Windhoek, Khomas	Mr	Registered Stakeholder Database
Chamber of Mines of Namibia	Windhoek	Ms.	Registered Stakeholder Database
Chambers of Commerce and Industry (KHP)	Keetmanshoop	Mr.	Registered Stakeholder Database
DRFN (Desert Research Foundation Namibia)	Windhoek, Khomas		Registered Stakeholder Database
GIZ	Windhoek, Khomas	Mr	Registered Stakeholder Database
Haib Rhenisch Mission	Haib neighbour		Registered Stakeholder Database
KGF War Grave Commission	Windhoek, Khomas	Mr	Registered Stakeholder Database
Legal Assistance Centre	Windhoek, Khomas	Mr	Registered Stakeholder Database
Legal Assistance Centre	Windhoek, Khomas	Ms	Registered Stakeholder Database
NHAG/SDFN (Shack Dwellers Federation of Namibia)	Windhoek, Khomas	Mr	Registered Stakeholder Database
NHAG/SDFN (Shack Dwellers Federation of Namibia)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Namibia Nature Foundation (NNF)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Namibian Chamber of Environment	Windhoek	Dr.	Registered Stakeholder Database
Namibian Chamber of Environment (NCE)	Windhoek, Khomas	Mr	Registered Stakeholder Database
Namibian Environment & Wildlife Society (NEWS)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Namibian Environment & Wildlife Society (NEWS)	Windhoek, Khomas		Registered Stakeholder Database
Namibian Environment & Wildlife Society (NEWS)	Windhoek, Khomas	Mr	Registered Stakeholder Database
ORKA (Orange River Karoo Conservation Area)	Windhoek, Khomas	Mr	Registered Stakeholder Database
ORKA (Orange River Karoo Conservation Area)	Windhoek, Khomas	Ms	Registered Stakeholder Database
Southern African Institute for Environmental Assessment (SAIEA)	Windhoek	Mr.	Registered Stakeholder Database
//KRC	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
//KRC	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
//KRC	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
//KRC	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Amusha Solar	Windhoek, OH	Mr	Engagement Meeting Attendance Register
BTA	Karasburg, CO	Mr	Engagement Meeting Attendance Register
BTA	Karasburg, CO	Mr	Engagement Meeting Attendance Register
BTA	Karasburg, CO	Mr	Engagement Meeting Attendance Register

BTA	Karasburg, CO	Mr	Engagement Meeting Attendance Register
Bank Whk	Noordoewer GH	Ms	Engagement Meeting Attendance Register
Bank Whk	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Benagri	Noordoewer	Ms	Engagement Meeting Attendance Register
Benagri	Noordoewer	Mr	Registered Stakeholder Database
Bengari	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Bondelswarts	Karasburg	Mr	Engagement Meeting Attendance Register
Business	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Comm Noord	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Commit	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Community	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Constituency Office	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Constituency Office	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Councillor	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Dept Water Affairs, (KHP)	Keetmanshoop	Mr.	Registered Stakeholder Database
Director of Education	//Kharas Region	Mr.	Registered Stakeholder Database
Driver	Noordoewer GH	Mr	Engagement Meeting Attendance Register
EHW Baard PS	Noordoewer	Ms	Engagement Meeting Attendance Register
Education	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Education	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
GMTS	Noordoewer	Mr	Registered Stakeholder Database
GRN	Noordoewer GH	Ms	Engagement Meeting Attendance Register
Geo-Tech	Noordoewer GH	Mr.	Engagement Meeting Attendance Register
Haib Minerals	Noordoewer BPS	Ms	Engagement Meeting Attendance Register

Haib Minerals	Windhoek, OH	Ms	Engagement Meeting Attendance Register
Haib Minerals	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
Haib Minerals	Windhoek, OH	Ms	Engagement Meeting Attendance Register
KB East Cons	Karasburg, CO	Mr	Engagement Meeting Attendance Register
KGF	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Karas Agri Solutions/ Joydale	Noordoewer	Mr	Registered Stakeholder Database
Karas Regnl Council	Noordoewer	Mr.	Registered Stakeholder Database
Karasburg	Karasburg	Mr	Engagement Meeting Attendance Register
Karasburg Oos	Karasburg	Mr	Engagement Meeting Attendance Register
Karasburg Town Council	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Karstens	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Knight Piesold	Windhoek, OH	Mr	Engagement Meeting Attendance Register
Knight Piesold	Karasburg, CO	Mr	Engagement Meeting Attendance Register
Kominet	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
Koryx Copper	Karasburg, CO	Mr	Engagement Meeting Attendance Register
Koryx Copper	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Koryx Copper	Noordoewer GH	Mr.	Engagement Meeting Attendance Register
Koryx Copper	Karasburg, CO	Mr	Engagement Meeting Attendance Register
MH Cloete	Noordoewer GH	Mr	Engagement Meeting Attendance Register
MHAISS	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
MOEYSAC	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
MOEYSAC	Noordoewer BPS	Ms	Engagement Meeting Attendance Register
MOEYSAC	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
MOHSS	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
MOHSS	//Kharas Region	Ms.	Registered Stakeholder Database
MOHSS	Aussenkehr	Mr.	Registered Stakeholder Database
MWT	Windhoek, OH	Mr	Engagement Meeting Attendance Register
MWT	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
Mechnic	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Min Agriculture	//Kharas Region	Mr.	Registered Stakeholder Database

NCRC	Noordoewer GH	Mr	Engagement Meeting Attendance Register
NCRC	Noordoewer	Mr	Engagement Meeting Attendance Register
NCRC	Noordoewer GH	Mr	Engagement Meeting Attendance Register
NCRC	Noordoewer GH	Ms	Engagement Meeting Attendance Register
NCRC	Noordoewer GH	Ms	Engagement Meeting Attendance Register
NCRC Member	Noordoewer	Mr	Engagement Meeting Attendance Register
NCRC Member	Noordoewer	Mr	Engagement Meeting Attendance Register
NCRC Member	Noordoewer	Mr	Engagement Meeting Attendance Register
NCRC Member	Noordoewer	Mr	Engagement Meeting Attendance Register
NCRC Member	Noordoewer	Ms	Engagement Meeting Attendance Register
NCRC Member	Noordoewer	Ms	Engagement Meeting Attendance Register
NGGA	Noordoewer GH	Ms	Engagement Meeting Attendance Register
NamRa	Noordoewer BPS	Mr	Engagement Meeting Attendance Register
NamWater Karasburg	Karasburg	Mr.	Registered Stakeholder Database
Noordoewer Guesthouse	Noordoewer	Ms	Registered Stakeholder Database
Noordoewer Police	Noordoewer	Ms.	Registered Stakeholder Database
Noordoewer Police	Noordoewer	Mr.	Registered Stakeholder Database
North South Properties	Windhoek, Khomas	Mr	Registered Stakeholder Database
North South Properties	Windhoek, Khomas	Ms	Registered Stakeholder Database
ORVI	Noordoewer GH	Mr	Engagement Meeting Attendance Register
ORVI	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Omeya	Noordoewer GH	Ms	Engagement Meeting Attendance Register
Orange R Guest House	Noordoewer	Mr	Registered Stakeholder Database
Orange Shop	Noordoewer	Ms	Engagement Meeting Attendance Register
Orange Shop	Noordoewer	Mr	Engagement Meeting Attendance Register
Oranjemund Constituency Office	Oranjemund	Ms	Registered Stakeholder Database
Oranjemund Town Council	Oranjemund		Registered Stakeholder Database
Organisation			Registered Stakeholder Database
Organisation			Engagement Meeting Attendance Register
Organisation	Email Registrations from		Engagement Meeting Attendance Register

Organisation	Meeting Attendance Registers		Engagement Meeting Attendance Register
Orsss	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Privaat	Noordoewer	Mr	Registered Stakeholder Database
Private	Noordoewer GH	Mr.	Engagement Meeting Attendance Register
Private	Noordoewer GH	Ms	Engagement Meeting Attendance Register
RoshSkor Township (Pty) Ltd	Rosh Pinah		Registered Stakeholder Database
RoshSkor Township (Pty) Ltd	Rosh Pinah	Mr	Registered Stakeholder Database
Sandfontein	Noordoewer	Mr	Registered Stakeholder Database
Shell	Noordoewer	Mr	Registered Stakeholder Database
Shell	Noordoewer	Mr	Engagement Meeting Attendance Register
Silverland	Aussenkehr	Mr	Registered Stakeholder Database
Silverland	Noordoewer	Mr	Registered Stakeholder Database
Silverlands	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Sonop	Noordoewer	Mr	Registered Stakeholder Database
Sonop	Noordoewer GH	Ms	Engagement Meeting Attendance Register
Sonop	Noordoewer	Ms	Registered Stakeholder Database
Sonop	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Sonop	Noordoewer	Mr	Registered Stakeholder Database
UDA	Karasburg, CO	Ms	Engagement Meeting Attendance Register
UDA	Karasburg, CO	Mr	Engagement Meeting Attendance Register
UPB	Noordoewer GH	Mr	Engagement Meeting Attendance Register
VIVO ENERGY Namibia	Windhoek, OH	Mr	Engagement Meeting Attendance Register
VR Group	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Vivo Energy	Noordoewer	Mr	Registered Stakeholder Database
Youth Rep	Noordoewer	Mr	Engagement Meeting Attendance Register
AJ Farm	Noordoewer GH	Mr	Engagement Meeting Attendance Register
Bundi	Noordoewer	Mr	Registered Stakeholder Database
Farm Kakkiesdoom	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database
Farm Kakkiesdoom	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database
Farm Withoek No. 387, Noordoewer Area, Karas, Namibia	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database

Farm Witputz No. 258 Noordoewer Area, Karas, Namibia	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database
Farm: Kromrivier No. 359	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database
Farmer	Noordoewer GH	Ms	Engagement Meeting Attendance Register
Joydale & Omega Boerdery	Noordoewer	Mr	Registered Stakeholder Database
Karstens Farm	Aussenkehr	Mr	Registered Stakeholder Database
Koaribib Farm	Noordoewer (Haib Neighbour)	Ms	Registered Stakeholder Database
Kromrivier Farm	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database
Nam Grape Growers Assoc	Aussenkehr	Ms	Registered Stakeholder Database
Namibia Grape Company	Aussenkehr	Mr	Registered Stakeholder Database
Namibian Grape Growers Association	Aussenkehr	Mr	Registered Stakeholder Database
Namibian Grape Growers Association (NGGA)	South Africa	Mr	Registered Stakeholder Database
Small-Scale Farmers Cooperative, Noordoewer	Noordoewer	Mr	Registered Stakeholder Database
Small-Scale Farmers Cooperative, Noordoewer	Noordoewer	Mr	Registered Stakeholder Database
Sonop Farms	Noordoewer	Ms	Engagement Meeting Attendance Register
Tulongeni	Noordoewer	Mr	Registered Stakeholder Database
VRW	Noordoewer	Mr	Registered Stakeholder Database
Amanzi Trails	Noordoewer		Registered Stakeholder Database
Bundi Orange River Base Camp	Noordoewer		Registered Stakeholder Database
Felix Unite Camp	Noordoewer		Registered Stakeholder Database
Fiddlers Creek	Vioolsdrif	Ms	Registered Stakeholder Database
Frontier River Resort	Vioolsdrif	Mr	Registered Stakeholder Database
Kwelanga River Lodge	Vioolsdrif		Registered Stakeholder Database
Noordoewer Guest House	Vioolsdrif	Mr	Registered Stakeholder Database
Orange River Lodge	Vioolsdrif	Ms	Registered Stakeholder Database
Orange River Rafting Lodge	Noordoewer		Registered Stakeholder Database
Riversun Retreat	Noordoewer		Registered Stakeholder Database
Sandfontein Lodge	Noordoewer (Haib Neighbour)	Mr	Registered Stakeholder Database
Southern Civils, Orange river lodge, farmer		Mr	Registered Stakeholder Database
The Growcery Camp	Vioolsdrif	Mr	Registered Stakeholder Database
Independent Researcher	Windhoek	Mr.	Registered Stakeholder Database

International Union for Conservation of Nature (IUCN)	Windhoek, Khomas	Mr	Registered Stakeholder Database
NUST	//Kharas Region	Mr.	Registered Stakeholder Database
Namibia Agricultural Union	Windhoek	Ms	Registered Stakeholder Database
Blue Sigma			Engagement Meeting Attendance Register
Gariap Watch		Mr	Engagement Meeting Attendance Register
Geo-Tech	Windhoek, Khomas	Ms	Engagement Meeting Attendance Register
NNF	Windhoek, Khomas		Engagement Meeting Attendance Register
NNF	Windhoek, Khomas	Mr	Engagement Meeting Attendance Register
NNF	Windhoek, Khomas	Mr	Engagement Meeting Attendance Register
NNF	Karibib, Erongo	Ms	Engagement Meeting Attendance Register
Omave		Ms	Engagement Meeting Attendance Register
VIVO ENERGY Namibia	Windhoek, Khomas	Mr	Engagement Meeting Attendance Register
Namibia Institute of Corporate Governance (NICG)	Windhoek, Khomas	Mr	Registered Stakeholder Database
North South Properties (NSP)	Windhoek, Khomas	Mr	Registered Stakeholder Database

APPENDIX B: STAKEHOLDER NOTIFICATION AND COMMUNICATION MATERIALS

Part A – Scoping Phase

- Appendix B.A.1: Background Information Document
- Appendix B.A.2: Email Notifications,
- Appendix B.A.3: Site, Public and Social Media
- Appendix B.A.4: Radio Announcements and Broadcast Schedules
- Appendix B.A.5: Written Notices to Stakeholders

Part B – Impact Assessment Phase

- Appendix B.B.1: Background Information Document
- Appendix B.B.2: Newspaper Notices
- Appendix B.B.3: Public and Social Media Notices
- Appendix B.B.4: Radio Announcements and Broadcast Schedules
- Appendix B.B.5: Direct Notifications to Adjacent Landowners
- Appendix B.B.6: Email Notifications
- Appendix B.B.7: Proof of SMS Notifications

PART A: SCOPING PHASE

APPENDIX B.A.1: Background Information Document

Background Information Document: English

**Proposed Haib Copper Project on EPL 3140,
Noordoewer, //Karas Region**

**BACKGROUND INFORMATION DOCUMENT
ENVIRONMENTAL SCOPING STUDY**



**KORYX
COPPER**

 **environmental consulting**

 **Knight Piésold
CONSULTING**

*Haib Copper Project
Background Information Document*

MEFT application number: APP-006117.

BACKGROUND

Haib Minerals (Pty) Ltd, a Namibian-registered company, operates as a subsidiary of Koryx Copper Inc., a Canadian copper development Company, focused on advancing the 100% owned Haib Copper Project in Namibia.

The Haib Copper Project is located approximately 25 km north-east of Noordoewer, along the southern border of Namibia. The Orange River runs immediately to the south of the site boundary. The Haib deposit straddles the Voisruis River, a tributary of the Haib River, which is an ephemeral tributary of the Orange River.

The Project is a large, advanced (PEA-stage) copper/molybdenum porphyry deposit with a long history of exploration and project development by multiple operators. Exploration activities are ongoing, regulated under Exclusive Prospecting License (EPL) 3140, issued to Haib Copper in 2007 by the Ministry of Industries, Mines and Energy (MIME) and associated Environmental Clearance Certificate (ECC 01233) issued in 2014 by the Ministry of Environment Forestry and Tourism (MEFT).

The Project would benefit the Namibian economy through revenues during the construction phase, royalties, levies and taxes during the Life of Mine (LoM), and positively contribute towards employment and infrastructure development.

Although the Project is currently in the exploration and studies phase, whereby the feasibility of the Project is being defined through ongoing investigations and analysis, the Project has advanced to the point where Haib Minerals is applying to the Executive Director, Ministry of Industries, Mines and Energy (MIME), and the Environmental Commissioner, Ministry of Environment, Forestry and Tourism (MEFT), for an Environmental Clearance Certificate (ECC) in terms of Environmental Management Act, 2007 and the Regulations (2012) for the Haib Copper Mining Project. MEFT application number: APP-006117.

Haib Minerals appointed DRA Global Limited, Knight Piésold Consulting (Pty) (kP), Gubeka, The MSA Group (Pty) Ltd (MSA) and SRK Consulting (Pty) Ltd to support the development of the Project studies and design. kP Namibia was appointed to support the development of environmental scoping and impact studies and ongoing regulatory compliance associated with the Haib Copper Project.

Mr. Joseph Mulders and Dr. Lima Maartens, in the capacity of independent Environmental Assessment Practitioners (EAPs) are undertaking an Environmental Assessment (Scoping, Impact Assessment and Environmental Management Plan) for the proposed activities. To date, various specialist assessments have been undertaken for the proposed project area, including cultural heritage, water resources and water demand, terrestrial biodiversity and aquatic biodiversity assessments, while other assessments are currently ongoing, including air quality, noise, groundwater and socio-economic assessments.

This document aims to provide background information on the proposed Project to enable Interested and Affected Parties (I&APs) to provide their comments or concerns.

*Haib Copper Project
Background Information Document*

ENVIRONMENTAL SCOPING AND IMPACT ASSESSMENT PROCESS

In terms of the Environmental Management Act, 7 of 2007, gazetted on 27 December 2007 (Government Gazette No. 3966), and the Environmental Impact Assessment Regulations promulgated on 6 February 2012, an Environmental Impact Assessment (EIA) for the proposed Project must be approved by the Ministry of Industries, Mines and Energy (MIME), the Competent Authority. This process involves seeking an Environmental Clearance Certificate (ECC) through the ECC application process as required by the Ministry of Environment, Forestry and Tourism (MEFT). The procedure requires an application phase, followed by a scoping phase, an environmental impact assessment (EIA) and an Environmental Management Plan (EMP) phase, to apply for the ECC as per the EIA Regulations. This sequence ensures adherence to regulatory requirements and facilitates the assessment and management of environmental and social impacts associated with the proposed Project. This Background Information Document (BID) serves as the start of the Environmental Scoping and Public Participation Process for the Project.

All Interested and Affected Parties (I&APs) are invited to register as such and participate in the Public Consultation Process. To register as an I&AP, please submit your full name and contact details to Knight Piésold at the details provided below with the project title as the email subject. The scoping report, once ready, will be made available online (<https://www.knightpiesold.com/pa/haib/>) and <https://www.koryxcopper.com/project-overview/social-and-environmental/>) for a public review period of 30 days. Registered I&APs will be informed of the review period dates and details via email and sms.

FOR FURTHER INFORMATION PLEASE CONTACT:

Joseph Mulders
+ 27 72 754 2603
or
Bianca Eiasen
+264 61 307 297
or
Lima Maartens
+26 46 125 5750
HaibESIA@knightpiesold.com
or
Heidri Nel
+26 48 165 17336
ESIAHaib@udanam.com

Preliminary economic estimates for the Haib project will be presented in the PEA towards the end of 2025. The current mine plan indicates that a maximum of 2,500 staff during construction and maximum of 1,140 during operations will be required by the Project. This will provide direct benefits through income and thus livelihoods to these households as well as support the broader economy for a minimum of 19 years of production in addition to the construction period of about 2 years.

Although alternatives have been provided, the final Project description and site layout are still to be informed by specialist impact studies, the broader environmental and social impact assessment, public and consultations with I&APs as well as the ongoing design process. Overall, any changes are anticipated to be in the order of landscape optimisation and no fundamental changes are expected.

The map provides the proposed Project location and site layout.

Potential environmental impacts identified are presented in the table below. Towards managing anticipated potential impacts, the following specialist baseline and impact assessment studies, still to be completed, have been identified: Archaeology and heritage, biodiversity (aquatic and terrestrial), air and noise quality, hydrology, geochemistry, water demand and water resources and socio-economic studies and associated routine monitoring.

Anticipated Impacts and Proposed Mitigation	
Possible Impact	Mitigation
Impact on heritage resources	- Demarcate sensitive areas and declare these as "no go" areas - Implement a Chance Find Procedure
Increased noise levels	- Working hours restricted - All vehicles and machinery to conform with regional noise standards
Decreased air quality	- Dust management - Emissions management
Increase in water use	- Apply for a water use licence - Implement water demand and water conservation measures - Off channel storage
Increase in water contamination	- Protection of aquifers - Runoff and contaminant management
Reduced biodiversity	- Design facility and operate as per mitigation hierarchy (avoid, minimise, manage, rehabilitate and offset) - Active management - Ongoing restoration/rehabilitation - Spill kits and permeability management
Soil contamination	- Implement erosion control measures - Implement storm water management measures (culverts and drains)
Increased surface water runoff	Traffic management plans
Increased traffic volumes	- Community management plans - Workforce management plans
Influx impacts	Job opportunities will be created and the potential for a variety of other benefits exist that will be explored
Socio economic benefit	

*Haib Copper Project
Background Information Document*

PROJECT DESCRIPTION

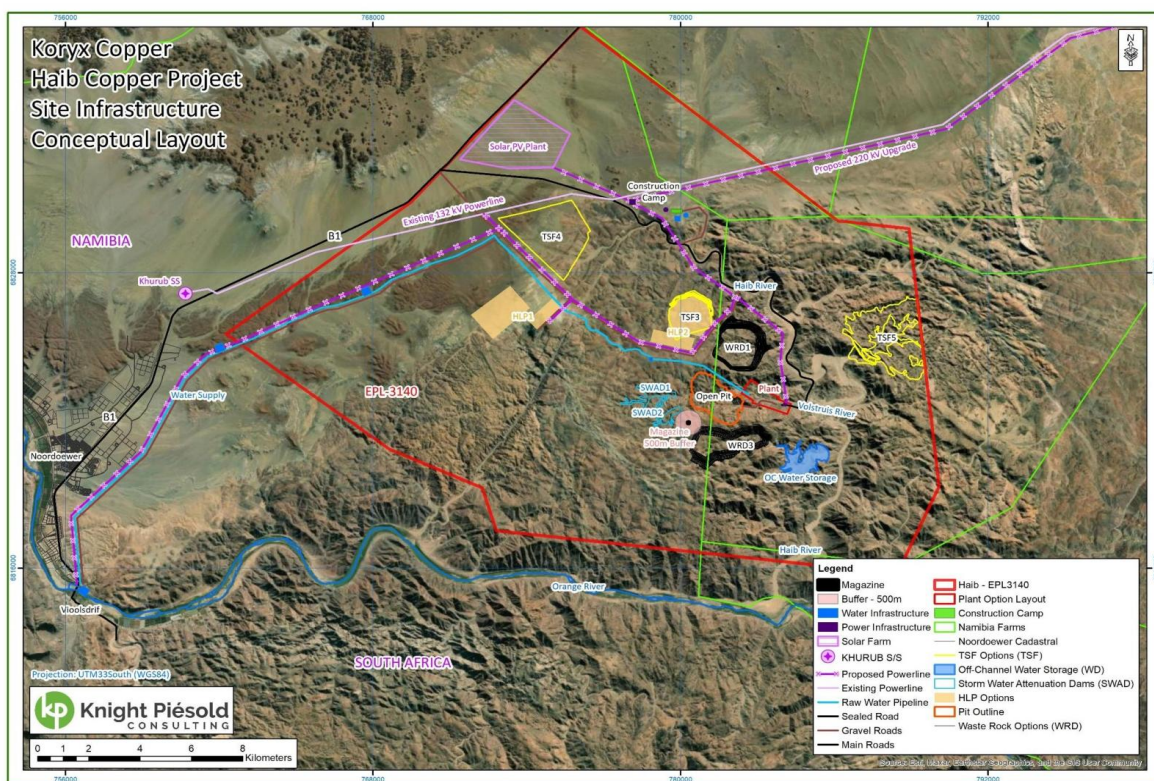
Haib Minerals is proposing the development and operation of a copper mine and associated infrastructure. The Project comprises a large copper and molybdenum resource to be mined from an open pit and processed through a crushing, milling and flotation concentrator and hydrometallurgical plant as well as a smaller heap leaching facility designed to accommodate oxide material and lower grade mineralisation. The mining throughput is predicted at 87.5 million tonnes per annum (Mtpa) for a life of mine of approximately 19 years with a total of 1.58 billion tonnes of material to be mined. Although the mine development is at an advanced conceptual phase, the key components, and potential options to be further assessed include the following:

1. A single large open pit
2. A concentrator processing plant (crushing, milling and flotation circuit with capacity of 24 Mtpa)
3. A heap leach, solvent extraction and electrowinning plant (capacity of 11 Mtpa with two alternative sites provided)
4. A tailings storage facility (TSF) (three alternatives provided)
5. Two Waste Rock Dumps (WRDs) (192 and 546 Mt)
6. A solar photovoltaic (PV) plant (150 MWp)
7. Two storm water attenuation dams (SWAD) above the open pit
8. Off-channel water storage
9. Water abstraction works, pipeline and associated infrastructure
10. Ancillary infrastructure (access roads, transmission lines, labour accommodation camp, offices etc)

The mining method will include mining predominantly copper mineralised material from a large open pit. These mining operations will involve drilling and blasting of all excavated material, which will then be graded and selected for further processing. Mineral recovery will use a concentrator (milling and flotation) for high-grade mineralised material and heap leaching for low-grade mineralised material. The power supply includes a hybrid solution combining a solar photovoltaic (PV) plant and a connection to the regional grid system from NamPower. The mines peak demand may be up to a maximum of 145 MVA with an annual consumption of 1,123.3 GWh, however power optimisation studies are still ongoing and expected to provide improvements through introducing efficiencies.

Waste will be generated in the form of process waste (both hazardous and non-hazardous) as well as domestic/municipal waste. Three Tailings Storage Facility (TSF) options are currently being assessed where process waste disposal will meet local Government and other statutory bodies' requirements. General and industrial waste will be removed and disposed of at an appropriate recycling or disposal facility off-site. A dedicated waste management and recycling facility and wastewater treatment plant will be built on site to manage hazardous waste and sewerage.

The Project's water demand is 20 million m³/yr of which supply is being investigated from two options including the Orange River and Neckartal Dam. Off-channel storage is sized towards offsetting the impacts of water abstraction from the Orange River. Abstraction of 6 million m³/annum from the Orange River for the Haib Copper Project has been accounted for in various basin water management strategies since 2004.



Background Information Document: Afrikaans

Voorgestelde Haib Koperprojek op EPL 3140, Noordoewer, //Kharas-streek

AGTERGRONDINLIGTINGSDOKUMENT OMGEWINGSOMVANGSSTUDIE



KORYX
COPPER

em
environmental consulting

kp Knight Piésold
CONSULTING

MEFT-aansoeknommer: APP-006117.

Haib Koperprojek
Agtergrondinligtingsdokument

AGTERGROND

Haib Minerals (Edms.) Bpk., 'n Namibiese-geregistreerde maatskappy, is 'n filiaal van Koryx Copper Inc., 'n Kanadese koperontwikkelingsmaatskappy wat fokus op die ontwikkeling van die 100% besette Haib Koperprojek in Namibië.

Die Haib Koperprojek is ongeveer 25 km noordoos van Noordoewer geleë, langs die suidelike grens van Namibië. Die Oranjerivier vloei direk suid van die terrein se grens. Die Haib-afsetting lê oor die Volstruusrivier, 'n sytak van die Habrivier, wat op sy beurt 'n eemere sytak van die Oranjerivier is.

Hierdie projek behels 'n groot, gevorderde (PEA-stadium) kopermolibdeen-porfiërasetting met 'n lang geskiedenis van eksplorاسیة en ontwikkeling deur verskeie operateurs. Eksplorاسیة-aktiwiteite duur steeds voort en word gereël deur die Uitsluitlike Prospekteringsiens (EPL) 3140, uitgereik aan Haib Copper in 2007 deur die Ministerie van Nywerhede, Myne en Energie (MIME), asook die Omgewingsklaringssertifikaat (ECC 01233) wat in 2014 deur die Ministerie van Omgewing, Bosbou en Toensme (MEFT) uitgereik is.

Die projek bied potensiele voordele vir die Namibiese ekonomie, insluitend inkomste tydens die konstruksiefase, tanieme, heffings en belasting oor die lewensduur van die myn, asook 'n positiewe bydrae tot werkskepping en infrastruktuurontwikkeling.

Hoewel die projek tans in die eksplorاسیة- en studiefase is, waartydens die lewensvatbaarheid van die projek deur voortgesette ondersoek en analises bepaal word, het die projek reeds gevorder tot waar Haib Minerals aansoek doen by die Uitvoerende Direkteur van MIME en die Omgewingskommissaris van MEFT vir 'n Omgewingsklaringssertifikaat (ECC) ingevolge die Wet op Omgewingsbestuur, 2007 en die Regulasies (2012) vir die Haib Koper Mynprojek. MEFT-aansoeknommer: APP-006117.

Haib Minerals het DRA Global Limited, Knight Piésold Consulting (Edms.) Bpk. (kP), Gubeka, The MSA Group (Edms.) Bpk. (MSA) en SRK Consulting (Edms.) Bpk. aangestel om die ontwikkeling van projekstudies en ontwerp te ondersteun. kP Namibia is spesifiek aangestel om die ontwikkeling van omgewingsomvangs- en impakstudies, asook deurtopende regulatoriese nakoming, te ondersteun.

Mnr. Joseph Mulders en Dr. Lima Maartens tree op as onafhanklike Omgewingsassesseringspraktisyne (OAP's) en voer die Omgewingsimpakstudie (omvangsbepaling, impakbepaling en Omgewingsbestuursplan) vir die voorgestelde aktiwiteite uit. Tot op hede is verskeie spesialisstudies reeds vir die projekgebied gedoen, insluitend kulturele erfenis, waterhulpbronne en -behoefte, terrestriële en akwatiese biodiversiteit. Verdere assesserings, soos luggehalte, geraas, grondwater en sosio-ekonomiese studies, is tans aan die gang.

Hierdie dokument het ten doel om agtergrondinligting oor die voorgestelde projek te verskaf sodat Belanghebbende en Geaffekteerde Partye (B&GP's) hul kommentaar of bekommernisse kan lewer.

Haib Copper Project
Agtergrondinligtingsdokument

OMGEWINGSOMVANGSSTUDIE- EN IMPAKSTUDIEPROSES

Ingevolge die Wet op Omgewingsbestuur, 7 van 2007 (gepubliseer op 27 Desember 2007, Staatskoerant Nr. 3968) en die Omgewingsimpakbepalingsregulasies (afgekondig op 6 Februarie 2012), moet 'n Omgewingsimpakstudie (OIS) vir die voorgestelde projek deur die Ministerie van Nywerhede, Myne en Energie (MIME), as die bevoegde owerheid, goedgekeur word. Hierdie proses behels die aansoek om 'n Omgewingsklaringssertifikaat (OKS) soos vereis deur die Ministerie van Omgewing, Bosbou en Toensme (MEFT). Die prosedure bestaan uit 'n aansoekfase, gevolg deur 'n omvangsbepalingsfase, 'n Omgewingsimpakstudie (OIS) en die opstel van 'n Omgewingsbestuursplan (OBP), soos bepaal in die OIS-regulasies. Hierdie stappe verseker regulatoriese nakoming en fasiliteer die evaluering en bestuur van omgewings- en maatskaplike impakte wat met die voorgestelde projek verband hou. Hierdie Agtergrondinligtingsdokument (AID) dien as die aanvang van die Omvangs- en Openbare Deelnemeproses vir die projek.

Alle Belanghebbende en Geaffekteerde Partye (B&GP's) word uitgenooi om te registreer en deel te neem aan die openbare konsultasieproses. Om as B&GP te registreer, stuur asseblief u volle naam en kontakbesonderhede aan Knight Piésold by die onderstaande besonderhede, met die projeknaam as e-posonderwerp. Die omvangsverslag sal, wanneer gereed, aanlyn beskikbaar gestel word (knightpiesold.com en koryxcopper.com) vir openbare kommentaar oor 'n periode van 30 dae. Geregisteerde B&GP's sal per e-pos en SMS ingelig word oor die relevante datums en besonderhede.

VIR VERDERE INLIGTING KONTAK ASSEBLIEF:

Joseph Mulders

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of

Bianca Elases

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of

Lima Maartens

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of

Heidri Nel

+26 48 165 17336

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Voorlopige ekonomiese beramings vir die Haib-projek sal teen die einde van 2025 aangebied word. Volgens die huidige mynbeplanning sal 'n maksimum van 2 500 werknemers tydens konstruksie, en tot 1 140 tydens operasies, vir die projek benodig word. Dit bied direkte voordele vir huishoudings in die vorm van inkomste en werksgeleenthede, sowel as ondersteuning aan die plaaslike en nasionale ekonomie vir ten minste 19 jaar van produksie, plus 'n konstruksietydperk van sowat 2 jaar.

Hoewel alternatiewe oorweeg is, moet die finale projekbeskrywing en terreinuitleg nog bepaal word deur die uitkoms van spesialis-impakstudies, die breër omgewings- en sosiale impakbepaling, openbare deelname, en die voortgesette ontwerpproses. Dit word verwag dat enige veranderinge hoofsaaklik landskapoptimalisering sal wees, sonder wesentlike verandering aan die projek se kern.

'n Kaart van die voorgestelde projekligging en terrein-uitleg is beskikbaar.

Potensiële Omgewings- en Maatskaplike Impakte en Beheermaatreëls	
Potensiële Impak	Beheermaatreëls
Impak op erfenskapbronne	- Sensitiewe areas word afgebaken en as 'beskermd gebied' verklaar; - kansvondsprosedure word toegepas waar nodig.
Verhoogde geraasvlakke	- Werkure word beperk tot redelike tye; - alle voertuie en masjinerie voldoen aan toepaslike geraasstandaarde.
Verminderde luggehalte	Stofbeheer (bv. natspuit van paaie) en bestuur van uitlaatgasse word toegepas.
Toename in watergebruik	- Watergebruikslisensies word verkry; - waterbesparingsmaatreëls en doeltreffende aanwending word toegepas; - butekanaalberging word voorsien waar nodig.
Toename in waterbesoedeling	- Grondwaterhulpbronne word beskerm; - afloop en besoedeling word aktief bestuur.
Verminderde biodiversiteit	- Fasiliteite word ontwerp en bestuur volgens die versagtingshierargie (vermy, minimaliseer, bestuur, rehabiliteer, vergoed); - aktiewe bestuur en aanhoudende herstel.
Grondbesoedeling	Opruimstelle is beskikbaar; deurlaatsaakheid van grond word gereeld gemonitor.
Verhoogde oppervlaktewaterafloop	Erosiebeheermaatreëls, dreineringskanale en sluisse word gebruik om afloop te bestuur.
Verhoogde verkeersvolumes	'n Omvattende verkeersbestuursplan word toegepas om verhoogde verkeer te hanteer.
Involie-impakte	Gemeenskaps- en werksmagbestuursplanne word geïmplementeer om die invloed van nuwe inwoners en werkers te bestuur.
Sosio-ekonomiese voordeel	Die projek skep nuwe werksgeleenthede, met die potensiaal vir verdere voordele vir die plaaslike gemeenskap wat deurtrendend ondersoek sal word.

Haib Copper Project
Agtergrondinligtingsdokument

PROJEK BESKRYWING

Haib Minerals stel die ontwikkeling en bedryf van 'n kopermyn en verwante infrastruktuur voor. Die projek behels 'n groot koper- en molibdeenbron wat uit 'n oopgroefmyn ontgin en verwerk sal word deur 'n vergruis-, maal- en fotasiestelsel, asook 'n hidrometalurgiese aanleg. Daar is ook 'n kleiner hoopputlogingsfasiliteit wat ontwerp is vir oksiedmateriaal en laergraad erts. Die beraamde mynbou-deursnit is 87,5 miljoen ton per jaar (Mtpa) vir 'n mynlewensduur van ongeveer 19 jaar, met 'n geskatte totaal van 1,58 miljard ton materiaal wat gemyn sal word.

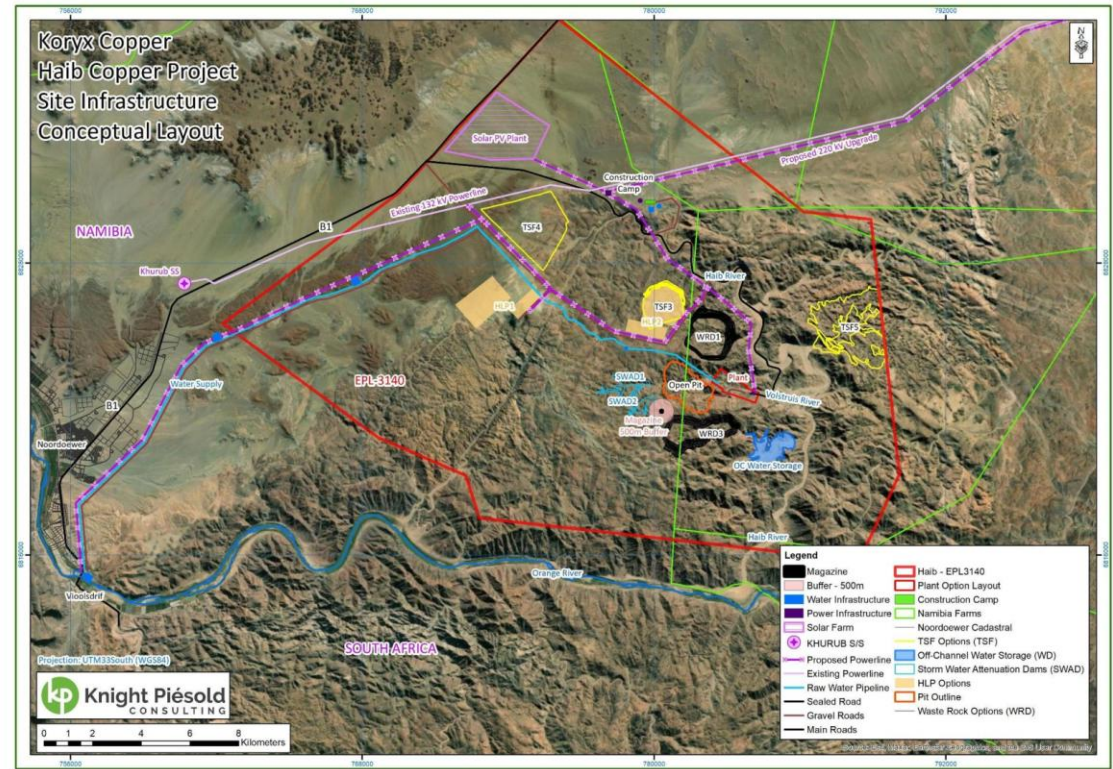
Hoewel die mynbou-ontwikkeling reeds in 'n gevorderde konsepstadium is, sluit die belangrikste komponente en potensiële alternatiewe die volgende in:

- Eén groot oopgroefmyn
- 'n Konsentratort-verwerkingsaanleg (vergruising, maal en foterig; kapasiteit van 24 Mtpa)
- 'n Hoopputlogings-, oplosmiddel-ekstraksie- en elektrowinning-aanleg (kapasiteit van 11 Mtpa; twee alternatiewe terreine beskikbaar)
- 'n Mynresidubergingfasiliteit (TSF) (drie alternatiewe beskikbaar)
- Twee afvalkipstortings (192 en 546 Mt)
- 'n Sonkrag-fotovoltaïese aanleg (150 MWp)
- Twee stormwaterbeheerdamme bo die oopgroefmyn
- Butekanaalwaterberging
- Wateronttrekkingswerke, pypleidings en verwante infrastruktuur
- Bykomstige infrastruktuur (toegangsroetes, transmissielinje, arbeidskamp, kantore, ens.)

Die voorgestelde mynboumetode behels hoofsaaklik die ontginning van koper-gemineraleerde materiaal uit 'n groot oopgroefmyn. Hierdie aktiviteit sluit boor- en plofwerk in, waarna die materiaal gekleur en vir verdere verwerking voorberei word. Herwinning van minerale vind plaas deur 'n konsentratort (maal en foterig) vir hoëgraadse materiaal, en hoopputloging vir laergraad materiaal. Kragvoorsiening sal 'n hibriede stelsel wees wat 'n sonkrag-fotovoltaïese aanleg en aansluiting op die plaaslike NamPower-kragnetwerk kombineer. Die myn se maksimum kragaanvraag kan tot 145 MVA wees, met 'n jaarlikse verbruik van 1 123,3 GWh, maar optimaliseringsstudies is steeds aan die gang.

Afval sal ontstaan as prosesafval (gevaarlik en nie-gevaarlik) sowel as huishoudelike/munisipale afval. Drie opsies vir residubergingfasiliteite (TSF) word oorweeg, afvalverwydering sal aan plaaslike wetlike vereistes voldoen. Algemene en industriële afval sal na toepaslike herwinnings- of wegdoeningsfasiliteite weggedoen word. 'n Spesiale afvalbestuurs- en herwinningsfasiliteit en rioolwaterbehandelingsaanleg sal op die terrein gebou word vir hantering van gevaarlike afval en rioolwater.

Die projek se waterbehoefte is ongeveer 20 miljoen m³ per jaar, met twee moontlike voorsieningsbronne wat ondersoek word: die Oranjerivier en die Neckartaldam. Butekanaalberging is so ontwerp om die impak van wateronttrekking uit die Oranjerivier te versag. Die onttrekking van 6 miljoen m³ per jaar uit die Oranjerivier vir die Haib koperprojek is sedert 2004 in verskeie waterbestuursplanne ingereken.



[illegible][illegible][illegible]

SPORT

Tramcar 17 July 2005 19

A photograph of a soccer match. In the foreground, a player in a red kit is in a dynamic pose, about to kick a soccer ball. Two players in yellow kits are positioned to defend him. The background shows the stands of a stadium with red and green seats. The image is part of a newspaper page, with the word 'SPORT' in a large, bold, green font at the top left and the date 'Tramcar 17 July 2005' and page number '19' at the top right.

NFA Top 8 on the cards

[illegible][illegible][illegible]

Vacancy

Administrative Assistant Synergi Impact

Forever Green, B3

Responsibilities:

- Coordinate and manage office functions and has the following account for a domestic and energetic person with fluid communication.

Days/Time: Weekdays

Job PURPOSE:

To support the day to day operations of Synergi Impact by coordinating print and production workflow, ensuring materials are met, and maintaining high service standards. The Administrative Assistant is responsible for managing relationships with internal teams and external partners, and supporting client-related tasks. This position requires strong organizational skills, attention to detail, and a high level of customer service. The role involves managing a variety of our print and branding services.

KEY PERFORMANCE AREAS:

- Production and quality control
- Customer service and communication
- Supplier and vendor management
- Client and internal communication
- Administrative and digital file management
- Quality assurance and operational compliance

Job Location:

10000 160th Avenue, Suite 100, Richmond, BC V6V 2C9

hr@synergiimpact.com

Project title: "ADMINISTRATIVE ASSISTANT" in the subject line

The "letter" refers to job descriptions and comprehensive info

Project start: 2024-07-01

Project end: 2024-07-01

Contracting Date: 25 July 2025 **Interim end:** 30 July 2025

Job Accounting: 2025-07-01





NOTES: Hereby giving for the proposed development of THE HAIR COPPER MINE near HOODWOODS / JEFFERAS RIDGE, NANAIMO, PRCU, COSEWIC CONSERVATION EVENTS

Nelson is a leading global leader of the Environmental Impact Act No. 27 (2007) and Regulation 27 of the Environmental Impact Assessment (EIA) Regulations that have KORYX Ltd's (KORYX) led to the Environmental Impact Assessment (EIA) for the proposed development of the Hair Copper Mine near Hoodwoods / Jefferas Ridge, Nanaimo, PRCU, COSEWIC CONSERVATION EVENTS. KORYX Ltd is an approved contractor to the Environmental Impact Assessment (EIA) Regulations.

As part of the Spilling Process, the general public and interested and affected Parties (IAPs) are invited to submit their comments to the proponent in the process and provide feedback.

Date	Event	Time	Where
18 August 2025	Open House	10:00 - 18:00	10150 Spence Primary School Hall, New Westminster
19 August 2025	Public Meeting	10:00 - 18:00	10150 Spence Primary School Hall, New Westminster

Notice and location of proposed activity: The Hair Copper Project is located approximately 25 km north-west of the town of Nanaimo, British Columbia. The proposed activity includes:

- As-spill copper mine pits
- As-spill copper mine pits
- Tailings and waste materials storage
- As-spill copper mine pits
- Solar photovoltaic (PV) panels
- Access roads, power supply lines, water supply lines
- Supporting infrastructure

If approved, construction will take 2-3 years with a peak staff of approximately 200.

Environmental Assessment Procedures: Project File/Record Containing Procedures

Registration and availability of Project Information: To register or to request information on the project, please contact us at the email below. Project information will be available for public comment from 17 July to 24 August 2025. It can be viewed at Nanaimo Resource Centre, 1117 Fraser Street, Nanaimo, BC V9S 5Y5, or by email to info@koryx.com, or downloaded from the project website at www.koryx.com.

Contact: Michelle "Michelle" >204 811 7720 (Nelson) and KORYX Ltd. KORYX@koryx.com

[illegible]

NFA Top 8 on the cards

JOHN TERLIERMAN
The long-tinged target of the Supreme Court for the National Labor Relations Board (NLRB) in the landmark *NLRB v. International Brotherhood of Teamsters* (1957) case, Terlierman was confirmed by Senate Republicans in 1958. He was appointed to the NLRB in 1960 and served in that position until 1968. This week, Terlierman was interviewed by *Business Week* and he was first interviewed in 1993. He was interviewed again in 1999 when he was 89 years old. He was interviewed a third time in 2009 when he was 94 years old. He was interviewed a fourth time in 2013 when he was 98 years old. He was interviewed a fifth time in 2015 when he was 100 years old. He was interviewed a sixth time in 2017 when he was 102 years old. He was interviewed a seventh time in 2019 when he was 104 years old. He was interviewed an eighth time in 2021 when he was 106 years old. He was interviewed a ninth time in 2023 when he was 108 years old. He was interviewed a tenth time in 2025 when he was 110 years old.

[illegible]

Open House Information Posters



Proposed Haib Copper Project
EPL 3140, Noordoeer, //Karas Region

What is Proposed?
Haib Minerals (Pty) Ltd is proposing the development and operation of an open pit copper mine and associated infrastructure.
• A large copper and molybdenum resource to be mined from an open pit and processed through a crushing, milling and flotation concentrator and heap leach plant.
• Mining throughput is predicted at 87.5 million tonnes per annum (Mtpa) for a life of mine of approximately 19 years with a total of 1.56 billion tonnes of material to be mined.

Where is the Proposed Project?
The Haib Copper Project is located approximately 25 km north-east of Noordoeer. The Haib deposit in southern Namibia straddles the Victoria River, a tributary of the Haib River, which both serving as ephemeral tributaries of the Orange River running immediately to the south of the site boundary.

Who are the Developers?
Haib Minerals (Pty) Ltd, a Namibian-registered subsidiary of Koryx Copper Inc., a Canadian copper development company, focused on advancing the 100% owned Haib Copper Project in Namibia.

Who are the Environmental Consultants?
Knight Piesold Consulting (Pty) Ltd, KP Namibia was appointed to support in the development of an environmental screening and impact studies report with an environmental management plan and ongoing regulatory compliance associated with the Haib Copper Project.

How will the Project Benefit Namibia?
The Project would benefit the Namibian economy through revenues during the construction phase, royalties, levies and taxes during the life of Mine (LOM) and positively contribute towards employment and infrastructure development two years construction and for a minimum of 19 years of production.

What is the Current Status?
The Project is in the exploration and pre-feasibility phase and investigations into economic and impact feasibility are ongoing. Exploration activities are regulated under Exclusive Prospecting License (EPL) 3140, issued to Haib Copper in 2007 by the Ministry of Industries, Mines and Energy (MIME) and associated Environmental Clearance Certificate (ECC 51233) issued in 2014 by the Ministry of Environment, Forestry and Tourism (MEFT). The Project is not a guarantee and depends on outcomes of these feasibility studies.
• Haib Minerals is entering the Exclusive Prospecting License (EPL) 3140 for an ECC in terms of Environmental Management Act, 2007 and the Regulations (2012) for the Haib Copper Mining Project.
• Various specialist assessments have been undertaken for the proposed project area: Cultural Heritage, Water Resources and Water Demand, Terrestrial Biodiversity and Aquatic Biodiversity.
• Other assessments are currently ongoing: Air Quality, Noise, Socio-economic and Socio-economic Assessments.

Proposed Haib Copper Project
EPL 3140, Noordoeer, //Karas Region

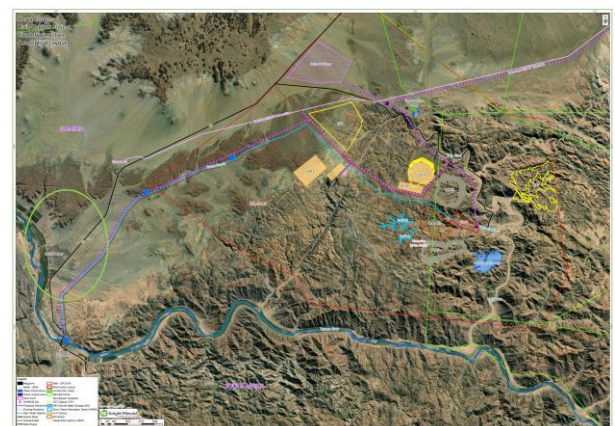
Potential Impacts
• Transformation of habitats
• Change in biodiversity
• Loss of sensitive species
• Potential loss of heritage resources
• Change in air quality (Dust and ambient air quality emissions)
• Change in noise levels
• Change in surface and ground water quality (rehabilitation, contamination, seepage)
• Change in water availability (Abstraction)
• Soil contamination and erosion
• Tailings dam breach
• Changes in traffic volumes
• Influx of people to the area
• Socio-economic development

Potential Mitigation
• Demarcate sensitive areas and declare these as 'no go' areas
• Undertake concurrent rehabilitation
• Implement a Change Find Procedure
• Working hours restricted / Noise standards
• Dust / Emissions Management
• Implement water demand and water conservation measures
• Protection of aquifers
• Rural and landscape management
• Seepage interception for WG monitoring and receipt to trenches
• Split kits and permeability management
• Implement erosion control measures
• Implement storm water management measures (ditches and drains)
• Natural tailings dam design / Avoid failure
• Traffic management plans
• Community management plans
• Workforce management plans
• Job opportunities

Register as an I&AP to stay informed and comment
• All interested and affected Parties (I&APs) are invited to register as such and participate in the Public Consultation Process. To register as an I&AP, please submit your full name and contact details to Knight Piesold at the details provided below with the project title in the email subject. Please provide comments, ideas or concerns to: Heidi Nel, +264 81 691 7234 - heidi.nel@kpsouthafrica.com OR Linda Maartens / Joseph Muller, +26 48 125 5190 / +27 17 784 500 - jmaartens@kpsouthafrica.com
• The screening report, once ready, will be made available online (<https://www.kpsouthafrica.com/na/na/>) and NamWater Development and Project Consultation and Environmental Impact Assessment for a public review period of 30 days. Registered I&APs will be informed of the review period dates and details via email and sms.

The ESIA Process and how Stakeholders can Contribute
In accordance with the Environmental Management Act, 7 of 2007, gazetted on 27 December 2007 (Government Gazette No. 3956), and the Environmental Impact Assessment Regulations promulgated on 6 February 2012

Phase	Purpose	Public Participation
Screening	- Develop project description and Background Information Document (BID) - Application for ECC is submitted to the Competent Authority (CA) - CA to provide feedback	- Stakeholders register as an I&AP, to receive future project information and / or formally record issues and concerns - Stakeholders attend Public Meetings and comment on Draft Scoping Report - Provide input at an early stage into the various project components and the authorisation requirements
Scoping (Define ToR of ESIA)	- I&AP identification, notification and registration - Public Participation, Consultations, Review and Comment on BID (3-week process) - Determine ToR for EIA Phase - I&AP Review and Comment	Can interact with the project team and raise issues, concerns, potential opportunities or expectations
ESIA (Impact Reporting and Environmental Management Plan (EMP))	- Assess Alternatives - Baseline Studies - Impact Prediction, Evaluation, mitigation - Develop EIS and EMP - I&AP Review and Comment - Submit ECC Application	- I&AP comment on Draft ESIA Report and Environmental Management Plan (EMP) - I&AP can interact with the project team and raise issues, concerns, potential opportunities or expectations
Decision Making	Authority assessment and decision made by the CA and conditions of approval	I&AP will be advised of the decision
Appeal	Environmental Assessment Practitioner (EAP) to notify registered I&APs of decision, and of their rights to appeal to the Minister, MEFT, within 14 days	Stakeholders have the opportunity to appeal the decision



APPENDIX B.A.4: Scoping Phase Radio Announcements

Radio Announcements and Broadcast Schedules

Radio announcements were broadcast through //Kharas Community Radio and the Namibian Broadcasting Corporation (NBC) to inform residents and interested and affected parties of the Scoping Phase public meeting held on 11 August 2025 at 17:30 at EHW Baard Primary School, Noordoewer.

Radio Station	Language	Broadcast Period
//Kharas Community Radio (103.5 FM)	Afrikaans	Four weeks; two days per week; morning and afternoon/evening
NBC Hartklop	Afrikaans	30 July, 2 August, 6 August and 9 August 2025
NBC National Station	English	30 July, 2 August, 6 August and 9 August 2025
NBC Kaisames FM	Nama/Damara	30 July, 2 August, 6 August and 9 August 2025

The NBC notices were broadcast in the morning and afternoon. The //Kharas Community Radio campaign comprised 16 broadcast slots.

Notice Wording

English Notice

Residents of Noordoewer!

You are invited to a community meeting on Monday, 11 August 2025, at EHW Baard Primary School, starting at 17:30.

The meeting forms part of the Environmental Impact Assessment (EIA) for the proposed Haib Copper Mine near Noordoewer. This process is being conducted in line with the Environmental Management Act (Act 7 of 2007) and is required for the application for an Environmental Clearance Certificate (ECC). The purpose of the meeting is to discuss potential environmental and social impacts and to share important information with the community.

Afrikaans Notice

Inwoners van Noordoewer!

U word uitgenooi na 'n gemeenskapsvergadering op Maandag, 11 Augustus 2025, by EHW Baard Laerskool, wat om 17:30 sal begin.

Die vergadering is deel van die Omgewingsimpakstudie (OIS) vir die voorgestelde Haib Kopermyn naby Noordoewer. Hierdie proses word uitgevoer ingevolge die Omgewingsbestuurswet (Wet 7 van 2007), en is nodig vir die aansoek om 'n Omgewingsgoedkeuringssertifikaat (OGS).

Die doel van die vergadering is om moontlike omgewings- en sosiale impakte te bespreek en om belangrike inligting met die gemeenskap te deel.

The notice was also broadcast in Nama/Damara through NBC Kaisames FM.

Broadcast Verification Contacts

Radio Station	Contact Person	Contact Details
//Kharas Community Radio	Marius Bloodstaan	Office: 063 226 759; Cell: 085 266 9488; Email: kharascommunicate2@gmail.com
NBC	Anna Henock, Account Manager	Mobile: +264 81 122 3168; Email: ahenock@nbc.na

APPENDIX B.A.5 Written Notices to Stakeholders

Scoping Phase Notification Letters



Our Ref: 1281
Your Ref:
Date: 21 July 2025

Attention: Ms. Ndiyakupi Nghitwamata
Executive Director
Ministry of Agriculture, Fisheries, Water and Land Reform
Windhoek, Namibia

INVITATION TO ATTEND A DEDICATED STAKEHOLDER MEETING
Scoping Phase – Environmental and Social Impact Assessment (ESIA) Proposed Haib Copper Project near Noordoewer, //Kharas Region

Dear Madam,

Haib Minerals (Pty) Ltd, a Namibian subsidiary of Koryx Copper Inc., proposes the development of the Haib Copper Project near Noordoewer in the //Kharas Region. The proposed development includes an open-pit copper mine, on-site processing facilities (milling & flotation and heap leaching), tailings and mine waste management facilities, a solar photovoltaic (PV) plant and supporting infrastructure.

A **Background Information Document (BID)** is enclosed to support your review of this proposed project. It outlines the project, potential issues, and how stakeholders can participate in the process.

Figure 1: Indicative location of the proposed Haib Copper Project near Noordoewer, //Kharas Region.



Tel: +264 61 240 300 | Fax: +264 61 240 309 | Email: info@udanam.com
www.udanam.com
Medba's Corner, 45 Nelson Mandela Ave, Klein Windhoek, Windhoek
PO Box 20837, Windhoek, Namibia, 9000
DIRECTORS: JH OPPENHEIM (MANAGING DIRECTOR) BCTPFP | EA SIMON X

An Environmental and Social Impact Assessment (ESIA) is being conducted as part of the application for an Environmental Clearance Certificate (ECC), in line with the Environmental Management Act (No. 7 of 2007) and its regulations. This notification step represents the formal initiation of the ESIA process.

Knight Pésold Consulting (Namibia) (Pty) Ltd, with Urban Dynamics (Pty) Ltd (UDA), have been appointed as the official consultants (the independent Environmental Assessment Practitioners (EAPs)), responsible for this formal stakeholder engagement and public consultation process.

You are hereby invited to attend a dedicated stakeholder meeting to share your perspectives and provide input on the environmental and social aspects of the proposed development.

Meeting Details:

- **Date:** Friday, 8 August 2025
- **Time:** 09:00 – 12:00
- **Venue:** Opera House, The Village, Windhoek

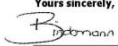
Meeting Objective:

This engagement aims to bring together line ministries, regulatory authorities, and Windhoek-based NGOs to:

- Provide an overview of the Haib Copper Project and ESIA process;
- Discuss potential environmental and social considerations; and
- Capture feedback and recommendations from key institutional stakeholders.

Coffee and light snacks will be served after the conclusion of the meeting to allow for informal discussions and networking. Please confirm your attendance and register as an Interested and Affected Party (I&AP) by contacting: □ esiahaib@udanam.com | □ +264 81 651 7336 (Heidri Nel).

We look forward to your participation and valuable input.

Yours sincerely,

Heidri Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd

2 | Page



Our Ref: 1281
Your Ref:
Date: 14 October 2025

Mr. Ralph Sachika
The Acting Chief Regional Officer
//Kharas Regional Council
Private Bag 5007
Keetmanshoop
Attention Mr. Sachika,

Subject: Request for a Dedicated Meeting with the //Kharas Regional Council (Directorate of Planning & Development)

Dear Sir,

Knight Pésold Consulting (Pty) Ltd, in collaboration with Urban Dynamics Africa (Pty) Ltd, is currently undertaking a Social Impact Assessment (SIA) for the proposed Haib Copper Mine Project, situated near Noordoewer in the //Kharas Region.

As part of our ongoing stakeholder engagement and coordination process, we wish to formally request a dedicated meeting with the //Kharas Regional Council, specifically through the Directorate of Planning & Development, to discuss the project's social and economic considerations and its alignment with the region's planning and development priorities.

We recognise the important role of the //Kharas Regional Council as the local authority for the Noordoewer Settlement, and therefore view this engagement as an essential opportunity to ensure that regional planning perspectives and development priorities are adequately reflected in the assessment.

Please note that this meeting will be separate from the engagement held with the Council Authority in August 2025, and will focus specifically on planning, socio-economic, and settlement-related matters.

We would like to propose holding the meeting on Tuesday, 22 October 2025, at approximately 11:00 a.m., at a venue convenient to your office. Kindly confirm whether this date and time are suitable.

We greatly appreciate your cooperation and look forward to a constructive engagement with the //Kharas Regional Council on this important regional development initiative.

Yours sincerely,

Heidri Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd

Tel: +264 61 240 300 | Fax: +264 61 240 309 | Email: info@udanam.com
www.udanam.com
Medba's Corner, 45 Nelson Mandela Ave, Klein Windhoek, Windhoek
PO Box 20837, Windhoek, Namibia, 9000
DIRECTORS: JH OPPENHEIM (MANAGING DIRECTOR) BCTPFP | EA SIMON X



Our Ref: 1281
Your Ref:
Date: 17 October 2025

Senior Councillor Hans Josob
Chairperson:
Bondelswarts Traditional Authority
//Kharas Region
Attention: Mr. H. Josob

Subject: Request for a Meeting with the Bondelswarts Traditional Authority – Haib Copper Mine SIA

Dear Sir

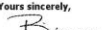
Knight Pésold Consulting (Pty) Ltd, in collaboration with Urban Dynamics Africa (Pty) Ltd, is currently conducting a Social Impact Assessment (SIA) for the proposed Haib Copper Mine Project, located near Noordoewer in the //Kharas Region.

As part of this process, we wish to formally request a meeting with the Bondelswarts Traditional Authority. The purpose of the meeting is to obtain information on social and economic aspects within the constituency, which will contribute to the social baseline and inform the broader assessment of potential impacts associated with the project.

We would like to propose holding the meeting on Tuesday, 20 October 2025, at 10:00 a.m., at the Noordoewer Guesthouse.

Your insights regarding local socio-economic conditions, community priorities, and development initiatives will be highly valuable in ensuring that the assessment accurately reflects the realities of the area.

We look forward to your confirmation.

Yours sincerely,

Heidri Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd

Tel: +264 61 240 300 | Fax: +264 61 240 309 | Email: info@udanam.com
www.udanam.com
Medba's Corner, 45 Nelson Mandela Ave, Klein Windhoek, Windhoek
PO Box 20837, Windhoek, Namibia, 9000
DIRECTORS: JH OPPENHEIM (MANAGING DIRECTOR) BCTPFP | EA SIMON X

Urban Dynamics Arica (Pty) Ltd.
EIA Stakeholder Engagement Report:
NamWater EIA



Our Ref: 1281
Your Ref:
Date: 21 July 2025

Attention: Honourable Councillor Amakali
Constituency Development Committee
//Kharas Region

INVITATION TO ATTEND A FOCUS GROUP DISCUSSION (FGD)

Environmental and Social Impact Assessment (ESIA) – Haib Copper Project near Noordoewer, //Kharas Region

Dear Honourable Councillor Amakali,

Haib Minerals (Pty) Ltd, a Namibian subsidiary of Koryx Copper Inc., is undertaking an Environmental and Social Impact Assessment (ESIA) for the proposed Haib Copper Project near Noordoewer, in the //Kharas Region. The proposed development includes an open-pit copper mine, processing facilities, tailings and waste management areas, a solar PV plant, and supporting infrastructure.

Figure 1: Indicative location of the proposed Haib Copper Project near Noordoewer, //Kharas Region.



Tel: +264 61 240 300 | Fax: +264 61 240 309 | Email: info@udanam.com
www.udanam.com
Madiba's Corner, 45 Nelson Mandela Ave. Klein Windhoek, Windhoek
PO Box 20837, Windhoek, Namibia, 9000
DIRECTORS: JH OPPENMAN (MANAGING DIRECTOR) (BTRP) | EA SIMON METRP

As part of the ESIA process, which is being conducted in line with the Environmental Management Act (No. 7 of 2007) and its regulations, a series of Focus Group Discussions (FGDs) are planned with key stakeholder groups.

We are pleased to invite you and members of the Constituency Development Committee (CDC) to participate in a dedicated Focus Group Discussion. Your input and that of the CDC are highly valuable to this process.

A Background Information Document (BID) is enclosed for your review.

Focus Group Discussion Details – CDC:

- **Date:** Tuesday, 12 August 2025
- **Time:** 14:00 – 15:00
- **Venue:** Noordoewer Guesthouse, Noordoewer

Meeting Objective:

- This FGD will allow CDC representatives to:
- Receive an overview of the Haib Copper Project and ESIA process;
- Raise concerns or recommendations on potential impacts;
- Provide local development perspectives and priorities relevant to the project area.

If you are unable to attend in person, we kindly ask that you nominate a suitable representative from the CDC to attend on your behalf. We also welcome your support in encouraging additional CDC members or key individuals to participate in the discussion.

Please confirm your attendance and register as an Interested and Affected Party (IAAP) by contacting: □ esahaib@udanam.com | □ +264 81 651 7336 (Heidri Nel)

We look forward to your participation and valuable input.

Yours sincerely,

Heidri Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd



//Kharas Regional Council
Karaburg West Constituency

P.O. Box 79, Noordoewer | Tel: 063-279 164 | Email: duagitar@gmail.com

Ref: CDC
Eng. Ms. Gisela Dula

31 July 2025

MEMO

To: All CDC Members
From: Hon. Councillor Taimi Amakali
Chairperson
Constituency Development Committee

RE: Invitation to Stakeholder Engagement meeting with Urban Dynamics

We hereby invite all the CDC members to a stakeholder engagement meeting as part of the Environmental Impact Assessment (EIA) process for the proposed Haib Copper Mine near Noordoewer.

Urban Dynamics on behalf of Haib Minerals (Pty) Ltd will conduct the engagements.

Venue: Noordoewer Guesthouse
Time: 14h00-15h00
Date: 12 August 2025 (Tuesday)

Please do RSVP before or on 6 August 2025. For any clarity, contact:
Ms. Gisela Dula - 0813542234

Counting on your usual cooperation.

Yours in development,

Hon. Cllr. Taimi Amakali
Karaburg West Constituency
Chairperson – Constituency Development Committee



All official correspondence must be addressed to the Chief Regional Officer



**URBAN
DYNAMICS**
town and regional planners

Our Ref: 1281
Your Ref:
Date: 21 July 2025

Attention: Ms. Ndiyakupi Nghituwamata

Executive Director
Ministry of Agriculture, Fisheries, Water and Land Reform
Windhoek, Namibia

INVITATION TO ATTEND A DEDICATED STAKEHOLDER MEETING

Scoping Phase – Environmental and Social Impact Assessment (ESIA) Proposed Haib Copper Project near Noordoewer, //Kharas Region

Dear Madam,

Haib Minerals (Pty) Ltd, a Namibian subsidiary of Koryx Copper Inc., proposes the development of the Haib Copper Project near Noordoewer in the //Kharas Region. The proposed development includes an open-pit copper mine, on-site processing facilities (milling & flotation and heap leaching), tailings and mine waste management facilities, a solar photovoltaic (PV) plant and supporting infrastructure.

A **Background Information Document (BID)** is enclosed to support your review of this proposed project. It outlines the project, potential issues, and how stakeholders can participate in the process.

Figure 1: Indicative location of the proposed Haib Copper Project near Noordoewer, //Kharas Region.



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PO Box 20837, Windhoek, Namibia,
DIRECTORS: JB OFFERMANN (MANAGING DIRECTOR) (BTPF) | EA SIMON N

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Knight Priesold Consulting (Namibia) (Pty) Ltd, with Urban Dynamics (Pty) Ltd (UDA), have been appointed as the official consultants (the independent Environmental Assessment Practitioners (EAPs)), responsible for this formal stakeholder engagement and public consultation process.

You are hereby invited to attend a dedicated stakeholder meeting to share your perspectives and provide input on the environmental and social aspects of the proposed development.

Meeting Details:

- **Date:** Friday, 8 August 2025
- **Time:** 09:00 – 12:00
- **Venue:** Opera House, The Village, Windhoek

Meeting Objective:

This engagement aims to bring together line ministries, regulatory authorities, and Windhoek-based NGOs to:

- Provide an overview of the Haib Copper Project and ESIA process;
- Discuss potential environmental and social considerations; and
- Capture feedback and recommendations from key institutional stakeholders.

Coffee and light snacks will be served after the conclusion of the meeting to allow for informal discussions and networking. Please confirm your attendance and register as an Interested and Affected Party (I&AP) by contacting: □ esiahaib@udanam.com | □ +264 81 651 7336 (Heidri Nel).

We look forward to your participation and valuable input.

Yours sincerely,

Heidri Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd

PART B: IMPACT ASSESSMENT PHASE
APPENDIX B.B.1: Background Information Document

Background Information Document – Refer to Appendix B.A.1



APPENDIX B.B.3: Site, Public and Social Media Notices

Site Notice



URBAN DYNAMICS
ARICA (PTY) LTD.



KORYX
COPPER



Knight Piésold
CONSULTING



NAMWATER
NATIONAL WATER AUTHORITY

EIA FOR THE PROPOSED DEVELOPMENT OF THE HAIB COPPER PROJECT NEAR NOORDOEWER, //KHARAS REGION, NAMIBIA: FINDINGS OF EIA AND RESPONSE TO ISSUES AND CONCERNS RAISED

Notice is hereby given in terms of the Environmental Management Act (No. 7 of 2007) and Regulation 21 of the Environmental Impact Assessment (EIA) Regulations that:

1. Koryx Copper, trading as Haib Minerals (Pty) Ltd, intends to apply for an Environmental Clearance Certificate (ECC) for the proposed development of the Haib Copper Mine on EPL 3140.
2. Namibian Water Corporation Ltd. (NamWater) intends to apply for ECC for the proposed development of water abstraction, supply and storage infrastructure required to supply the Haib Copper Mine water demand.

Given the interrelated and parallel nature of these activities, the two ECC applications will be assessed concurrently and will be subject to a joint stakeholder consultation process. Knight Piésold Consulting (Pty) Ltd has been appointed to undertake the Environmental Impact Assessment (EIA) for both applications.

Name of applicant:

- **Application 1:** Koryx Copper Inc., t.a. Haib Minerals (Pty) Ltd (Koryx)
- **Application 2:** Namibia Water Corporation Ltd. (NamWater)

Nature and location of proposed activity: The Haib Copper Project is located approximately 25 km north-east of Noordoewer, along Namibia's southern border.

Environmental Assessment Practitioner (EAP): Knight Piésold Consulting (Pty) Ltd (KP Namibia) supported by Urban Dynamics Africa

Registration and availability of Project information: Please contact us to register as an Interested and Affected Party (I&AP). Project information will be available for review and comment from 06 to 19 May 2026. It can be viewed at Noordoewer Settlement offices, //Kharas Regional Council (Keetmanshoop), on request from UDA, or downloaded from KP's website: <https://www.knightpiesold.com/pa/haib/>

Contact: Mobile/WhatsApp: +264 81 651 7336 Heidri Nel (UDA) Email: ESIAHaib@udanam.com

Proposed Activities			
Koryx	NamWater		
• An open-pit copper mine, • On-site processing plant, • Tailings and waste storage facilities, • Solar photovoltaic (PV) plant, • Access roads, power supply lines and • Supporting infrastructure	• Water abstraction works: Northern bank of the Orange River at the Haib River confluence, • Water supply pipelines and booster pump stations, • Off-channel storage dam, • Access roads and power supply lines		
If approved, construction will take 2–3 years, with a mine life of approximately 23 years.		If approved, construction will take 2–3 years	

As part of EIA (Impact Reporting and Environmental Management Plan (EMP) Phase, the general public and I&APs are invited to attend the public consultation events as scheduled below, participate in the process and provide comments. The meeting will include a presentation and Q&A session. All are welcome.

Date	Event	Time	Venue
22 April 26	Open House	09h00 – 13h00	EHW Baard Primary School Hall, Noordoewer
22 April 26	Public Meeting	17h30 – 19h30	EHW Baard Primary School Hall, Noordoewer



Urban Dynamics Arica (Pty) Ltd. EIA Stakeholder Engagement Report: NamWater EIA

Social Media Notices

Facebook Notices: Urban Dynamics Africa, MICT Kharas Region Office and on The Karas Media House

Urban Dynamics Africa
Local business · 2 km · Madiba's Corner, 45 Nelson Mandela Ave, Klein Windhoek, Windhoek, Namibia · [Open now](#) · 407 followers · 1 post in...
A Namibian based consulting company offering services in the field of urban & regional planning, tourism, socio-economic research, indicator & monitoring...
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Public Notice: Haib Copper Project EIA Consultation... See more

EIA FOR THE PROPOSED DEVELOPMENT OF THE HAIB COPPER PROJECT NEAR NOORDOEWER, !KHARAS REGION, NAMIBIA. FINDINGS OF EIA AND RESPONSE TO ISSUES AND CONCERNS RAISED

Notice is hereby given in terms of the Environmental Management Act (No. 7 of 2007) and Regulation 21 of the Environmental Impact Assessment (EIA) Regulations that:

- Koryx Copper, trading as Haib Minerals (Pty) Ltd, intends to apply for an Environmental Clearance Certificate (ECC) for the proposed development of the Haib Copper Mine on ERF 3140.
- NamWater Water Corporation Ltd. (NamWater) intends to apply for ECC for the proposed development of water abstraction, supply and storage infrastructure required to supply the Haib Copper Mine water demand.

Given the interrelated and parallel nature of these activities, the two ECC applications will be assessed concurrently and will be subject to a joint stakeholder consultation process. Knight Piacold Consulting (Pty) Ltd has been appointed to undertake the Environmental Impact Assessment (EIA) for both applications.

Name of applicant:

- Applicant 1: Koryx Copper Inc., t/a Haib Minerals (Pty) Ltd (Koryx)
- Applicant 2: NamWater Water Corporation Ltd. (NamWater)

Nature and location of proposed activity: The Haib Copper Project is located approximately 25 km north-east of Noordoewer, along Namibia's southern border.

Environmental Assessment Practitioner (EAP): Knight Piacold Consulting (Pty) Ltd (KP) Namibia supported by Urban Dynamics Africa.

Registration and availability of Project Information: Please contact us to register as an Interested and Affected Party (IAP). Project information will be available for review and comment from 06 to 19 May 2026. It can be viewed at Noordoewer Settlement Offices, !Kharas Regional Council (Kharasregion), on request from UDA, or downloaded from KP's website: <https://www.knightpiacold.com/haib/>

Contact: Mobile/WhatsApp: +264 81 651 7338 Heidi Nel (UDA) Email: ES@haibudafrica.com

Proposed Activities

Koryx	NamWater
- An open pit copper mine. - On-site processing plant. - Tailings and waste storage facilities. - Solar photovoltaic (PV) plant. - Access roads, power supply lines and - Supporting infrastructure. If approved, construction will take 2-3 years, with a mine life of approximately 23 years.	- Water abstraction works: Northern bank of the Orange River at the Haib River confluence. - Water supply pipelines and booster pump stations. - Off-channel storage dam. - Access roads and power supply lines. If approved, construction will take 2-3 years.

As part of EIA Impact Reporting and Environmental Management Plan (EMP) Phase, the general public and IAPs are invited to attend the public consultation events as scheduled below, participate in the process and provide comments. The meeting will include a presentation and Q&A session. All are welcome.

Date	Time	Location
22 April 26	09:00 – 13:00	Ernst Bauer Primary School Hall, Noordoewer
22 April 26	17:00 – 19:00	Ernst Bauer Primary School Hall, Noordoewer

MICT Kharas Regional Office
16h · [Public Notice: Haib Copper Project EIA Consultation... See more](#)

EIA FOR THE PROPOSED DEVELOPMENT OF THE HAIB COPPER PROJECT NEAR NOORDOEWER, !KHARAS REGION, NAMIBIA. FINDINGS OF EIA AND RESPONSE TO ISSUES AND CONCERNS RAISED

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Urban Dynamics Africa
13 April at 10:02 · [Public Notice: Haib Copper Project EIA Consultation... See more](#)

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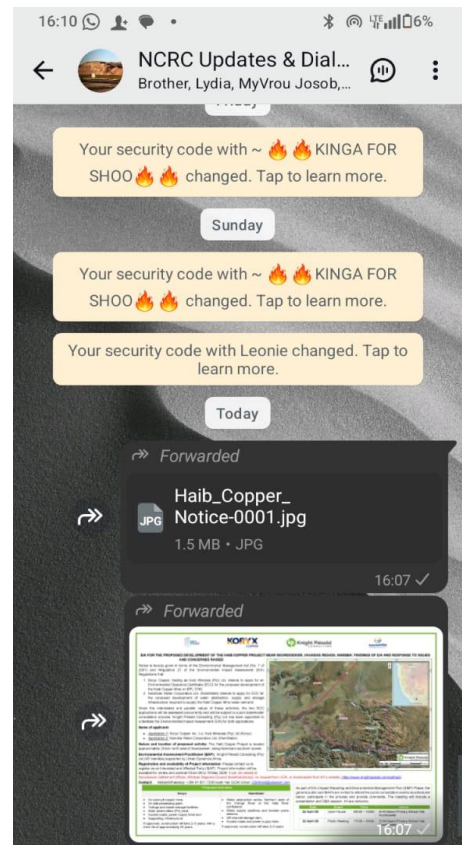
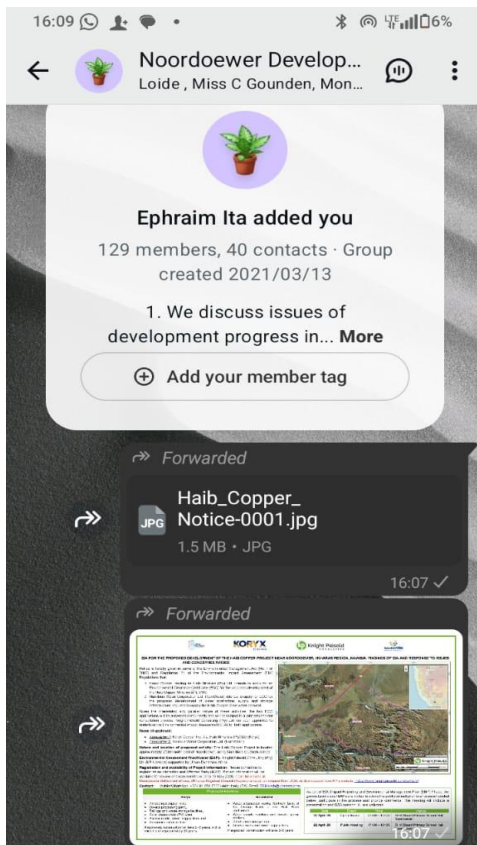
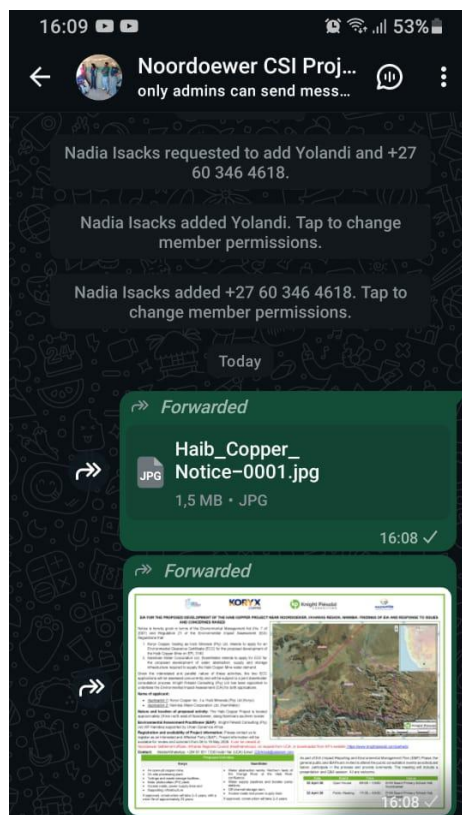
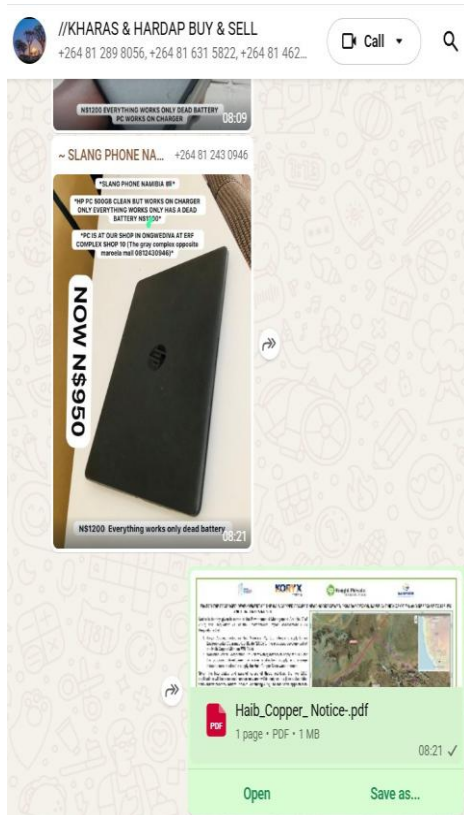
Proposed Activities

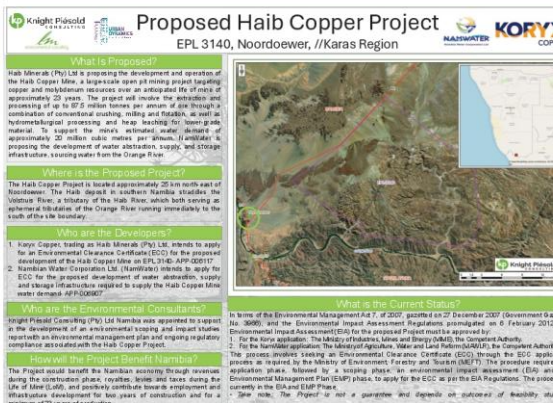
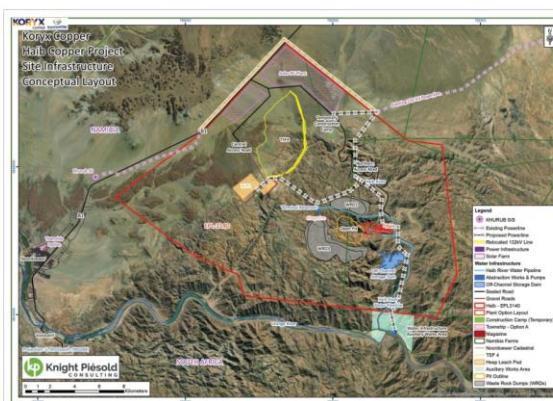
Koryx	NamWater
- An open pit copper mine. - On-site processing plant. - Tailings and waste storage facilities. - Solar photovoltaic (PV) plant. - Access roads, power supply lines and - Supporting infrastructure. If approved, construction will take 2-3 years, with a mine life of approximately 23 years.	- Water abstraction works: Northern bank of the Orange River at the Haib River confluence. - Water supply pipelines and booster pump stations. - Off-channel storage dam. - Access roads and power supply lines. If approved, construction will take 2-3 years.

As part of EIA Impact Reporting and Environmental Management Plan (EMP) Phase, the general public and IAPs are invited to attend the public consultation events as scheduled below, participate in the process and provide comments. The meeting will include a presentation and Q&A session. All are welcome.

Date	Time	Location
22 April 26	09:00 – 13:00	Ernst Bauer Primary School Hall, Noordoewer
22 April 26	17:00 – 19:00	Ernst Bauer Primary School Hall, Noordoewer

WhatsApp Notices: //Kharas & Hardap Buy & Sell. Noordoewer CSI Project, Noordoewer Development and NCRC Updates





APPENDIX B.B.4– EIA Phase Radio Announcements

Radio Announcements and Broadcast Schedules

Radio announcements were broadcast through //Kharas Community Radio and NBC to inform residents and interested and affected parties of the EIA Phase public meeting held on 22 April 2026 at 17:30 at EHW Baard Primary School, Noordoewer.

Date	Broadcast Slot	//Kharas Community Radio	NBC National Station
18 April 2026	Afternoon	English / Afrikaans	English
20 April 2026	Morning	English / Afrikaans	English
21 April 2026	Afternoon and evening	English / Afrikaans	English
22 April 2026	Morning	English / Afrikaans	English

A total of five broadcast slots were aired through each radio service. //Kharas Community Radio alternated between English and Afrikaans, while NBC broadcast the notice in English.

Notice Wording

English Notice

Residents of Noordoewer!

You are invited to a community meeting on Wednesday, 22 April 2026, at EHW Baard Primary School, starting at 17:30.

The meeting forms part of the Environmental Impact Assessment (EIA) for the proposed Haib Copper Mine, owned by Koryx Copper, near Noordoewer and includes the related water supply activities by NamWater. This process is being conducted in line with the Environmental Management Act (Act 7 of 2007) and is required for the application for an Environmental Clearance Certificate (ECC).

The purpose of the meeting is to present the findings of the EIA, including how issues and concerns raised during the initial consultation phase have been addressed.

Afrikaans Notice

Inwoners van Noordoewer!

U word uitgenooi na 'n gemeenskapsvergadering op Woensdag, 22 April 2026, by EHW Baard Primêre Skool, wat om 17:30 begin.

Die vergadering vorm deel van die Omgewingsimpakstudie (OIS) vir die voorgestelde Haib Kopermyn, besit deur Koryx Copper, naby Noordoewer en sluit die verwante watervoorsieningsaktiwiteite deur NamWater in. Hierdie proses word uitgevoer in ooreenstemming met die Omgewingsbestuurswet (Wet 7 van 2007) en is nodig vir die aansoek om 'n Omgewingsklaringcertifikaat (OKS).

Die doel van die vergadering is om die bevindings van die OIS voor te lê, insluitend hoe kwessies en bekommernisse wat tydens die aanvanklike konsultasiefase geopper is, aangespreek is.

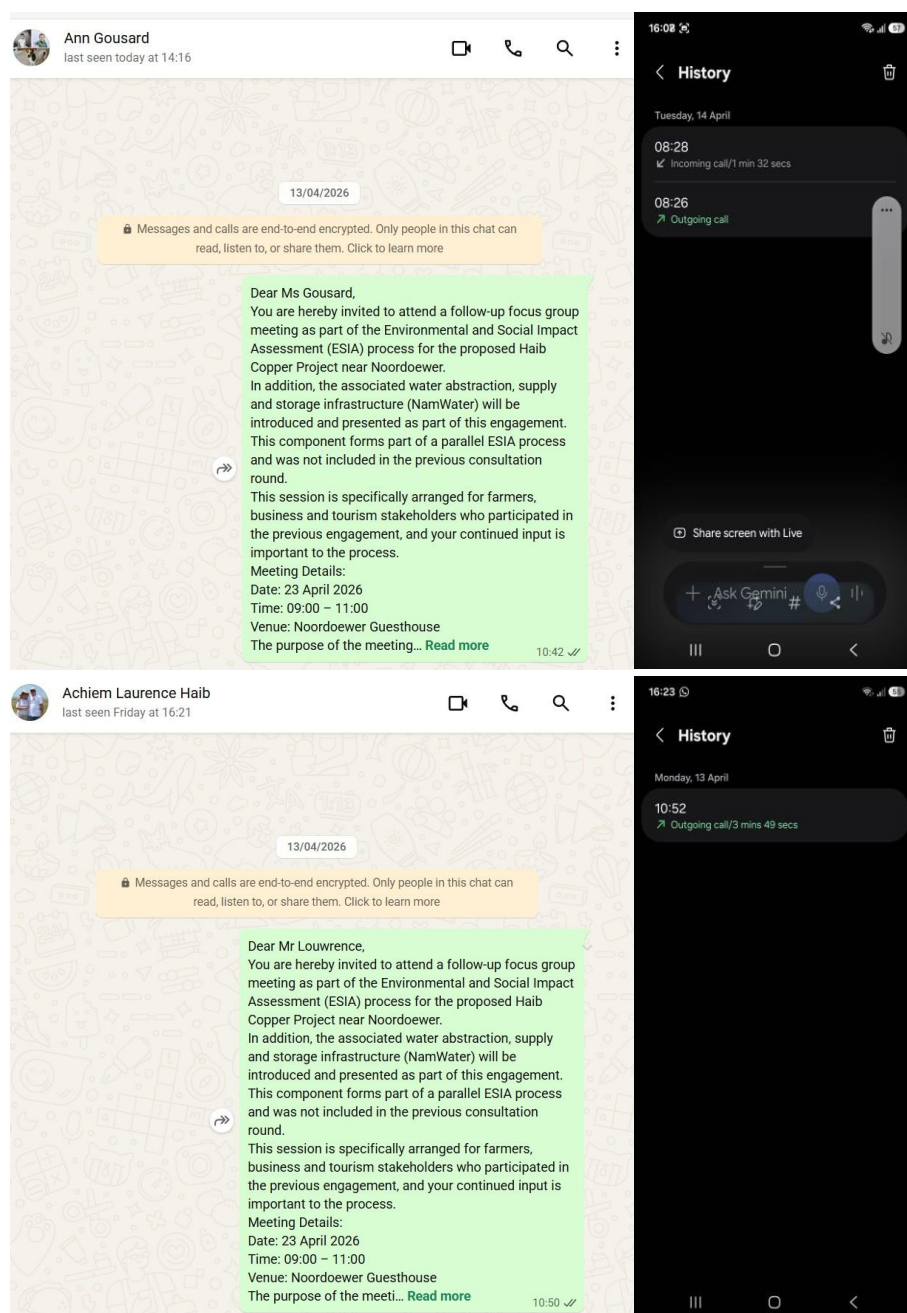
Broadcast Verification Contacts

Radio Station	Contact Person	Contact Details
//Kharas Community Radio	Marius Bloodstaan.	Office: 063 226 759; Cell: 085 266 9488; Email: kharascommunicate2@gmail.com
NBC	Anna Henock, Account Manager	Mobile: +264 81 122 3168; Email: ahenock@nbc.na

APPENDIX B.B.5: Notices to Haib Neighbours

Invited to meeting via WhatsApp and call local for following up

Neighbouring Stakeholder	Farm/Property	WhatsApp Invitation	Telephone Follow-up
Ann Goussard	Koaribib Farm	13 April 2026	14 April 2026
Achiem Lorenz	Farm Witputz No. 258	13 April 2026	14 April 2026



esiahaib@udanam.com

From: esiahaib@udanam.com
Sent: Wednesday, 8 April 2026 9:55 am
To:

Subject:

Dear Sir/Madam,

You are hereby invited to attend a follow-up focus group meeting as part of the Environmental and Social Impact Assessment (ESIA) process for the proposed Haib Copper Project near Noordoewer.

In addition, the associated water abstraction, supply and storage infrastructure (NamWater) will be introduced and presented as part of this engagement. This component forms part of a parallel ESIA process and was not included in the previous consultation round.

This session is specifically arranged for farmers, business and tourism stakeholders who participated in the previous engagement, and your continued input is important to the process.

Meeting Details:

Date: 23 April 2026

Time: 09:00 – 11:00

Venue: Noordoewer Guesthouse

The purpose of the meeting is to:

- Provide feedback on the draft EIA and Environmental Management Plan (EMP);
- Present key findings and specialist study results;
- Introduce and present the NamWater-related infrastructure component; and
- Obtain further input from stakeholders.

Project information is available on the Knight Piésold website:

<https://www.knightpiesold.com/pa/haib/>

Kindly confirm your attendance by replying to this email or contacting:

email: esiahaib@udanam.com

We look forward to your participation.

Kind regards,

Heidri Bindemann-Nel

Environmental Practitioner / Town Planner in Training

T: +264 61 240 300 | F: +264 61 240 309 | C: +264 81 651 7336

PO Box 20837, Windhoek, Namibia 9000 | Madiba's Corner, 45 Nelson Mandela Ave, Klein Windhoek

www.udanam.com

APPENDIX B.B.6 EIA Phase Written Notices and Notification Emails

EIA Phase Notification Letters

Letter	Subject	Ref	Date
1	Invitation to Follow-up Focus Group Meeting – Constituency Development Committee (Haib Copper Project, Noordoewer)	1281- CDC	08 April 2026
2	Invitation to Follow-up Community Meeting – Haib Copper Project (Noordoewer)	1281- NRC	08 April 2026

URBAN DYNAMICS
town and regional planners

Our Ref: 1281- CDC
Your Ref:
Date: 08 April 2026

Attention: Constituency Development Committee (CDC)
Karasburg West Constituency
//Kharas Regional Council

Dear Members of the Constituency Development Committee,

INVITATION TO FOLLOW-UP FOCUS GROUP MEETING – CONSTITUENCY DEVELOPMENT COMMITTEE (HAIB COPPER PROJECT, NOORDOEWER)

Knight Piesold Consulting (Pty) Ltd, in collaboration with Urban Dynamics Africa (Pty) Ltd, is undertaking the Environmental and Social Impact Assessment (ESIA) for the proposed Haib Copper Project near Noordoewer in the //Kharas Region.

Following previous engagements with the Constituency Development Committee (CDC), you are hereby invited to attend a follow-up focus group meeting.

The purpose of the meeting is to provide feedback on issues raised during earlier consultations, as well as to present the findings of the Draft Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP), including the NamWater study on water abstraction, supply and storage infrastructure.

Meeting Details:
Date: Thursday, 23 April 2026
Time: 11:00 – 13:00
Venue: Noordoewer Guest House

The discussion will focus on:

- Feedback on issues raised during previous engagements
- Findings of the Draft EIA and EMP
- The NamWater water abstraction study
- Matters relevant to local development planning and service provision
- Any additional stakeholder inputs

If you are unable to attend, you are welcome to nominate a representative.

Tel: +264 61 240 300 | Fax: +264 61 240 309 | Email: info@udanam.com
www.udanam.com
Mediba's Corner, 45 Nelson Mandela Ave, Klans Windhoek, Windhoek
PO Box 20837, Windhoek, Namibia, 8000
DIRECTORS: JB OFFERMANN (MANAGING DIRECTOR) BCTWP | SA SIMON WETPAP

Alternatively, members are welcome to attend the public consultation events scheduled for Wednesday, 22 April 2026 at EHW Baard Primary School, Noordoewer.

Kindly confirm attendance, if possible, by 20 April 2026.

For further information, please contact:
Email: esiahaib@udanam.com
Contact: Heidi Nel – 081 651 7336

We look forward to your participation.

Yours sincerely,

Heidi Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd

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URBAN DYNAMICS
town and regional planners

Our Ref: 1281- NRC
Your Ref:
Date: 08 April 2026

Attention: Mr Reginald Josob
Chairperson: Noordoewer Community Representative Committee (CRC)
Noordoewer

Dear Mr Josob,

INVITATION TO FOLLOW-UP COMMUNITY MEETING – HAIB COPPER PROJECT (NOORDOEWER)

Knight Piesold Consulting (Pty) Ltd, in collaboration with Urban Dynamics Africa (Pty) Ltd, is undertaking the Environmental and Social Impact Assessment (ESIA) for the proposed Haib Copper Project near Noordoewer in the //Kharas Region.

Following previous engagements with the Noordoewer Community Representative Committee (CRC), we would like to invite you and members of the Committee to attend a follow-up meeting.

The purpose of the meeting is to provide feedback on issues raised during earlier consultations, as well as to present the findings of the Draft Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP), including the NamWater study on water abstraction, supply and storage infrastructure.

Meeting Details:
Date: Thursday, 23 April 2026
Time: 14:00 – 15:00
Venue: Noordoewer Guest House

The discussion will include:

- Feedback on issues raised during previous engagements
- Findings of the Draft EIA and EMP
- The NamWater water abstraction study
- Matters relevant to the local community
- Any additional concerns or inputs

If you are unable to attend, you are welcome to nominate a representative. We would also appreciate your assistance in sharing this invitation with other members of the Committee.

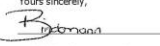
Tel: +264 61 240 300 | Fax: +264 61 240 309 | Email: info@udanam.com
www.udanam.com
Mediba's Corner, 45 Nelson Mandela Ave, Klans Windhoek, Windhoek
PO Box 20837, Windhoek, Namibia, 8000
DIRECTORS: JB OFFERMANN (MANAGING DIRECTOR) BCTWP | SA SIMON WETPAP

Alternatively, members are welcome to attend the public consultation events scheduled for Wednesday, 22 April 2026 at EHW Baard Primary School, Noordoewer.

Kindly confirm attendance, if possible, by 20 April 2026.

For further information, please contact:
Email: esiahaib@udanam.com
Contact: Heidi Nel – 081 651 7336

We look forward to your participation.

Yours sincerely,

Heidi Bindemann-Nel
Urban Dynamics Africa (Pty) Ltd

2 | Page

Invite email to the Feedback Sections

Feedback to Stakeholders Haib Copper Applications for ECC



Good Day Stakeholders,

I would like to provide an update on the 2 x ECC applications related to the Haib Copper Project.

Proposed Water Abstraction, Supply and Storage Activities by NamWater to support the Haib Mine Demand:

1. Thank you for all the comments received to date. All inputs support the process and the effective management of potential impacts of the development. The assessment team are working through the comments and have actioned additional work to support all concerns raised. Once a second draft of the EIA and appendices is available you will be notified and an additional round of reviews will be welcomed.
2. Responses to all comments received will be provided at that point, or sooner.
3. The publishing of the draft EIA and appendices will be followed by a feedback session where considerations will be addressed stakeholders will have the opportunity to discuss the outputs with NamWater and assessments team.

Proposed Haib Copper Mine by Koryx Copper:

1. The draft EIA and appendices remains under development
2. Many comments related to the above application similarly relate to the Haib Copper Mine application and thus updates are underway. Once the draft EIA and appendices is available for comment all registered I&APs will be notified.

We will be in touch as and when more information becomes available. In the meantime, please allow us time to address the comments received and update the reports accordingly.

Thank you for your input and continued participation in the process.

Stakeholders are encouraged to visit the project website for project information and updates: <https://www.knightpiesold.com/na/haib/>

Kind regards,

Heidri Bindemann-Nel
Environmental Practitioner
T: +264 61 240 300 | F: +264 61 240 309 | C: +264 81 651 7336
PO Box 20837, Windhoek, Namibia 9000 | Nadiba's Corner, 45 Nelson Mandela Ave, Klein Windhoek
www.udanam.com



Invite email to the MS Teams Meeting

✓ Accept ▼ ? Tentative ▼ ✕ Decline ▼ 🗓️ Propose New Time ▼ 📅 Calendar...



Fri 2026-07-31 12:14 PM

esiahaib@udanam.com

FW: Focus Group Engagement: Proposed Water Abstraction Activities by NamWater (App: 006907)

Required

When 12 August 2026 10:00 AM-12:00 PM | **Location** Microsoft Teams Meeting

Good Day Interested and Affected Party,

This invitation relates to the: **Application for Environmental Clearance Certificate (ECC) for the proposed Water Abstraction Activities to Supply the Haib Mine by Namibia Water Corporation Ltd (NamWater): APP- 006907**

The meeting objective is to discuss the Water Abstraction Strategy related to the proposed abstraction of water from the Orange River by NamWater to supply the Haib Mine. This virtual meeting is in direct response to the requests for clarity on the approach taken and results of the water resource and demand modelling. The meeting will clarify the roles and responsibilities of Haib Minerals (Pty) Ltd and NamWater in the scheme development and operation.

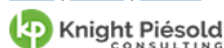
The meeting will be attended by Haib Minerals, NamWater and key specialists towards ensuring meaningful opportunity for engagement and discussion.

Thank you and we look forward to your participation.

Please reach out if you have any queries.

Joseph (Joe) Mülders
Senior Environmental Scientist
Knight Piésold (Pty) Ltd.

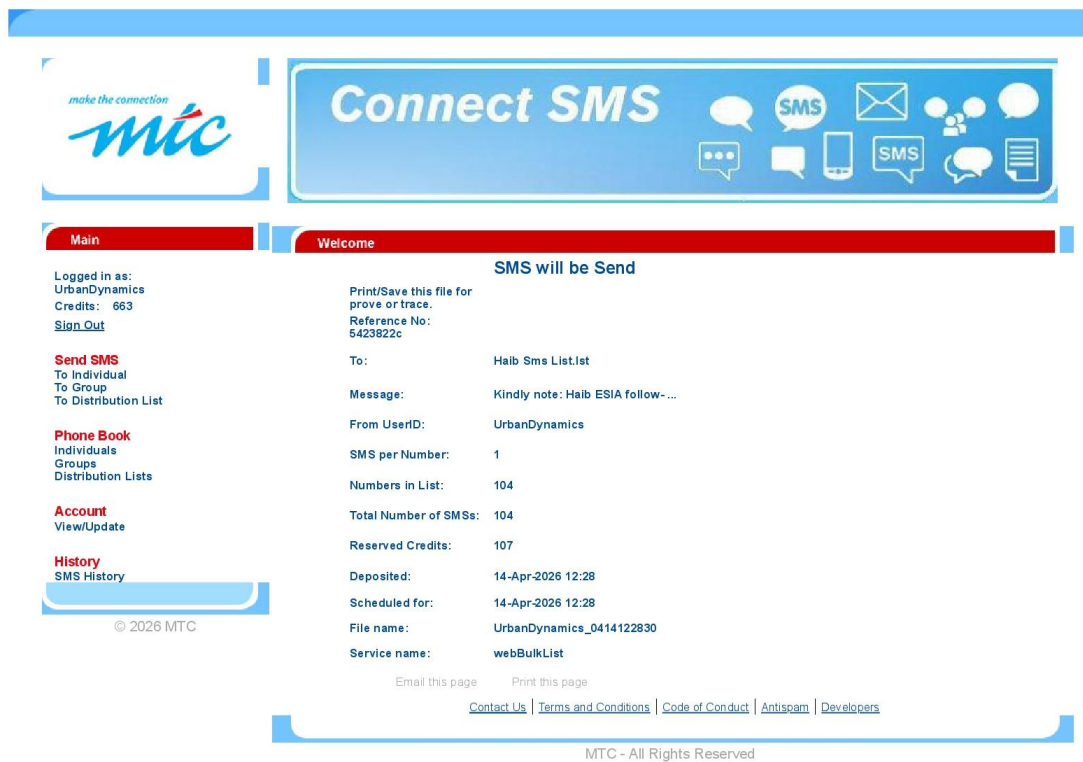
T: +27 11 806 7111 | D: 0727542603
1 Discovery Place, The Ridge, Sandhurst
Sandton | Gauteng | 2196 | South Africa
[twitter](#) | [linkedin](#) | [facebook](#)



ISO 9001:2015 Certificate No: 212061140/5
ISO 14001:2015 Certificate No: 170414034/2

APPENDIX B.B.7 Proof of SMS Notifications

An SMS notification was distributed to registered stakeholders through the MTC Connect SMS platform on 14 April 2026 at 12:28. The notification was sent to 104 recipients on the Haib stakeholder SMS distribution list. The system record below provides proof of the SMS distribution.



The screenshot displays the MTC Connect SMS web application interface. The header features the MTC logo with the tagline 'make the connection' and the 'Connect SMS' title, accompanied by various communication icons. The main content area is divided into a left sidebar with navigation links and a central panel showing the details of an SMS distribution.

Navigation Sidebar (Left):

- Main**
 - Logged in as: UrbanDynamics
 - Credits: 663
 - [Sign Out](#)
 - Send SMS**
 - To Individual
 - To Group
 - To Distribution List
 - Phone Book**
 - Individuals
 - Groups
 - Distribution Lists
 - Account**
 - [View/Update](#)
 - History**
 - [SMS History](#)
- Welcome**

SMS will be Send

Print/Save this file for prove or trace.
Reference No: 5423822c

To: Haib Sms List.list

Message: Kindly note: Haib ESIA follow-...

From UserID: UrbanDynamics

SMS per Number: 1

Numbers in List: 104

Total Number of SMSs: 104

Reserved Credits: 107

Deposited: 14-Apr-2026 12:28

Scheduled for: 14-Apr-2026 12:28

File name: UrbanDynamics_0414122830

Service name: webBulkList

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MTC - All Rights Reserved

APPENDIX C SCOPING PHASE STAKEHOLDER ENGAGEMENT RECORDS

APPENDIX C.1 SCOPING PHASE POWERPOINT PRESENTATION

APPENDIX C.2 SCOPING PHASE MEETING MINUTES

- APPENDIX C.2.1 National Authority Stakeholder Meeting
- APPENDIX C.2.2 Community Meeting
- APPENDIX C.2.3 Women's Focus Group Discussion
- APPENDIX C.2.4 Farmers, Business and Tourism Sector Focus Group Discussion
- APPENDIX C.2.5 Bondelswarts Traditional Authority Focus Group Discussion
- APPENDIX C.2.6 Constituency Development Committee Focus Group Discussion
- APPENDIX C.2.7 Noordoewer Community Representative Committee Focus Group Discussion
- APPENDIX C.2.8 Regional Authority Stakeholder Meeting

APPENDIX C.1 SCOPING PHASE POWERPOINT PRESENTATION

Proposed Haib Copper Project

Public and Focus Group Meetings, August 2025

Adding value. Delivering results.

Meeting Rules

- Please sign the attendance register
- Please switch off cell phones
- Presentation will be in English
- Opportunity for questions after presentation
- Introduce yourself when asking a question
- Work through the facilitator
- Questions and answers can be in English or Afrikaans
- Please allow everybody to participate and don't interrupt the speakers
- Permission to record the session to capture all comments?

Consultation Team

Independent Consultant	Applicant / Developer
Knight Piésold Consulting (Pty) Ltd	Koryx Copper Inc.
▪ Kuto Modie (KP Engineer) ▪ Amelia Briel (Environmental Specialist) ▪ Heidri Nel (Public Consultation Specialist) ▪ Apologies: Joseph Mulders and Lima Maartens (Environmental Assessment Practitioner (EAP))	▪ Charles Creasy (Project development Lead) ▪ Trevor Faber (COO)

Agenda / Outline

Independent Consultant	Applicant / Developer
Knight Piésold Consulting (Pty) Ltd	Koryx Copper Inc.
1. Preamble 3. Project Description 4. Legal Authorisation 5. Specialist studies 6. Identify Impacts and Mitigation 7. Register and Contribute 8. Questions	2. Introduce Koryx Copper Inc.

Preamble

What is Public Participation?

- A joint effort by stakeholders (including the authorities) and technical specialists, who work together to make informed and better decisions.
- The Public Participation Process ensures that the public's view will be reflected and considered by the regulating authorities.

You Can:
Register as an I&AP

You Can:
Provide input at an early stage

You Can:
Interact with the project team

You Can:
Raise issues, concerns and potential opportunities

Preamble

Phase of the Project

- Haib Minerals is proposing: Open pit copper mine and associated infrastructure
- The Project: Pre-feasibility phase and investigations ongoing and depends on results of economic and impact feasibility studies
- The Project is applying for Environmental Clearance through MEFT
- This session objectives: to share and get inputs from I&APs on the proposed Project as part of the EIA regulatory process
- Important to note: the Project not a guarantee and depends on outcomes of these feasibility studies

Preamble

Phase of the EIA

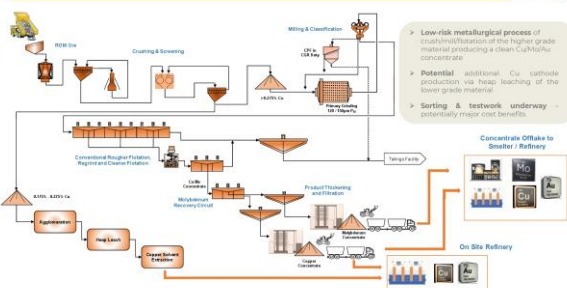
Phase	Purpose
Screening	• Develop project description and Background Information Document (BID) • Application for ECC is submitted to the Competent Authority (CA) • CA to provide feedback
Scoping (Define ToF of ESIA)	• I&AP identification, notification and registration • Public Participation, Consultations, Review and Comment on BID (3-week process) • Determine ToF for EIA Phase • I&AP Review and Comment
ESIA (Impact Reporting and Environmental Management Plan (EMP))	• Assess Alternatives • Baseline Studies • Impact Prediction, Evaluation, mitigation • Develop EIS and EMP • I&AP Review and Comment • Submit ECC Application
Decision Making	• Authority assessment and decision made by the CA and conditions of approval
Appeal	• Environmental Assessment Practitioner (EAP) to notify registered I&APs of decision, and of their rights to appeal to the Minister, MEFT, within 14 days



HAIB COPPER PROJECT: AERIAL VIEW LOOKING EAST



CONCEPTUAL PROCESS FLOWSHEET (MILLING/FLOTATION & HEAP LEACH)



WATER SUPPLY AND SECURITY



- The Project will require approximately 20 million cubic meters per annum and Koryx will follow a multi-source water supply strategy
- Some water will be abstracted from the Orange River and pumped to the Project
- The balance of the Project's water requirements could be sourced from dams within the !Karas region
- Construction of a pipeline from the potential supply dams to the Project is complex and costly. An investigation is underway to determine feasibility of constructing a supply pipeline and pumping water to the Haib Project
- Grape farms utilise 0.003 – 0.004 million cubic meters of water per hectare per annum. The Haib Project will abstract the equivalent amount of water from the Orange River as a 1,500 hectare grape farm

RESPONSIBLE MINING

Our promise:
Be a responsible corporate citizen from the start

This means:
Working in a way that respects and supports people, the environment, and local communities, while taking minerals from the ground. It includes using safe methods, reducing harm to nature, treating workers fairly, and helping nearby communities grow in a good way.

Specific commitments

- Health and safety first:** For all workers and communities.
- Water stewardship:** Responsible water use now and in future.
- Environmental care:** Protect nature and minimise harm and resource consumption.
- Community partnerships:** Build strong and respectful relationships.
- Shared prosperity:** Generate wider economic benefits.
- Respect human rights:** Uphold and respect human dignity and fairness.
- Ethical conduct:** Operate with integrity, transparency and compliance.
- Legacy planning:** Design for positive post-mine outcomes.
- Innovate and improve:** Continuously enhance performance and sustainability.

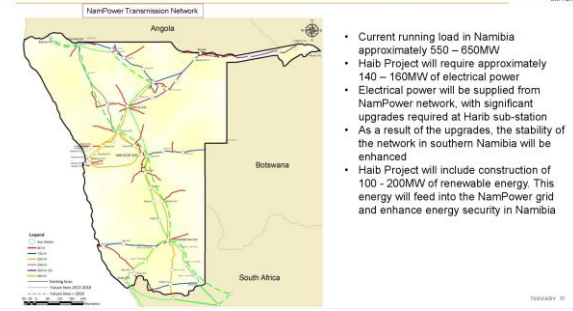
- A PROVEN TRACK RECORD OF SUCCESS, ESPECIALLY IN NAMIBIA**
- Highly successful business partnership between Heye Daun and Alan Friedman of more than 15 years. Delivered significant shareholder value through multiple successful mining exits
 - Focus on core competence (identify, acquire, advance) and repeating past success.
 - Very capable leadership & technical team with strong Namibian roots
 - Recently took over management control of Koryx Copper, which is developing the large-scale Haib Copper Project in Namibia



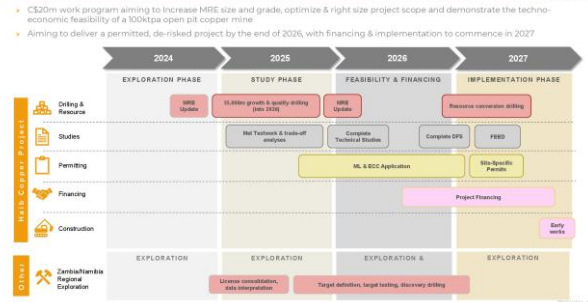
EXAMPLE OF OPEN PIT MINING IN NAMIBIA



ELECTRICAL POWER: DEMAND REQUIREMENTS AND NETWORK CONNECTIONS



INDICATIVE DEVELOPMENT SCHEDULE



RESPONSIBLE MINING

Developing a sustainability plan and implementation roadmap
That is materiality-driven and considers compliance, risk, investor expectations, stakeholder needs and impacts, and best practices and business strategy.

- Develop responsible mining implementation roadmap
- Define Koryx's responsible mining narrative
- Map and engage community stakeholders
- Develop local content plan (employment, procurement and development)
- Ensure environmental stewardship, regulatory compliance and high occupational health & safety standards

- Continue embedding sustainability practices and improve sustainability performance
- Publish inaugural sustainability report



Community Partnerships

Build strong and respectful relationships.

- Maintain open and transparent dialogue
- Provide periodic project updates
- Gather and address insights and concerns (also via Feedback & Grievance Mechanism)
- Build trust and genuine partnerships

Shared Prosperity

Generate wider economic benefits.

Informed by Namibia's Sixth National Development Plan (NDP6) goals of wealth creation, improved equality and employment creation.

Local content:

Communities and Namibia

- Jobs
- Procurement
- Training and skills development*
- Supplier support*

Corporate Social Investment (CSI):

- Development projects (very limited)
- Enterprise development*

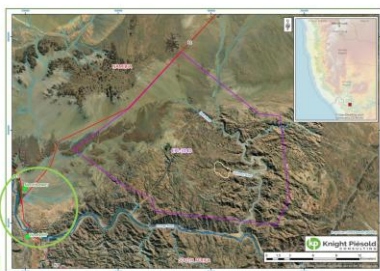
* Only to start during mine construction and operations (if the project goes ahead)

OSINO Osino serves as an example of what we are aiming for: www.osinoreources.com/responsibility

Background Information

Background Project Area

- Knight Piésold Consulting (Pty) Ltd appointed
- Conduct the Environmental Scoping Study for the construction and operation of the Haib Copper Project
- The Project is located +/- 25 km north-east of Noordoewer, along the southern border of Namibia



Background Information

Project Area

Flat gradient topography in the west and extreme topography in the east of EPL 3140



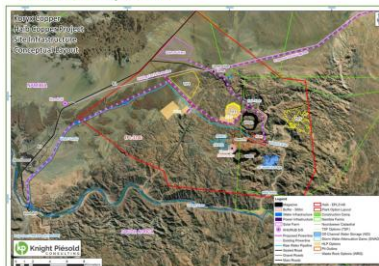
Background Information

What is the Project?

- A large **copper** and **molybdenum** resource
- An open pit, crushing, milling and flotation concentrator and heap leach plant.
- Throughput is predicted at **87.5 million tonnes per annum (Mtpa)** for a
- Life of mine of approximately **19 – 25 years**
- Total of **1.58 billion tonnes** of material to be mined.
- **Benefit Namibian economy through:**
 - Revenues, royalties, levies and taxes during the Life of Mine (LoM),
 - Contribute to employment, increased local economic activity and infrastructure development for a minimum of 19 years of production plus 2 years construction.

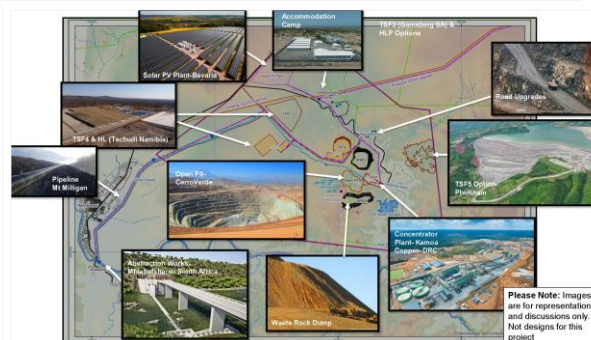
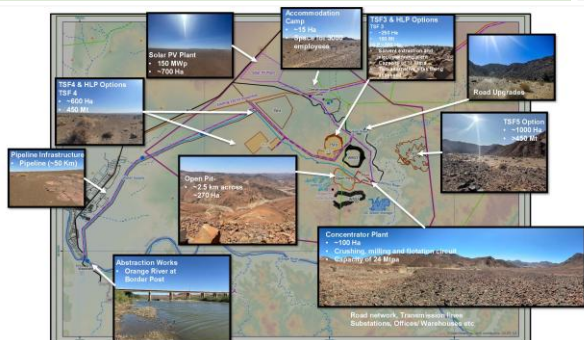
Background Information

What is Proposed?



1. A single large open pit
2. A concentrator processing plant
3. A heap leach plant
4. A tailings storage facility (TSF) (three alternatives provided)
5. Two Waste Rock Dumps (WRDs)
6. A solar photovoltaic (PV) plant
7. Two storm water attenuation dams (SWAD)
8. Off-channel water storage
9. Water abstraction works, pipeline and associated infrastructure
10. Ancillary infrastructure

Please Note: The layout is informed by topography, preliminary environmental sensitivities and engineering design



Legal Authorisation

Environmental Scoping: Develop the ToR for ESIA



Legal Authorisation

Required Authorisation

- Environmental Clearance certificate (ECC) from the Ministry of Environment Forestry and Tourism (MEXT)
 - Energy generation, transmission and storage activities
 - Waste management, treatment, handling and disposal activities
 - Mining and quarrying activities
 - Land use and development activities
 - Agriculture and aquaculture activities
 - Water resource development
 - Hazardous substance treatment, handling and storage
 - Infrastructure development
- Competent Authorities (CA) include:
 - Ministry of Industries, Mines and Energy (MIME)
 - Ministry of Agriculture, Fisheries, Water and Land Reform (MAFWLR)

Specialist Studies

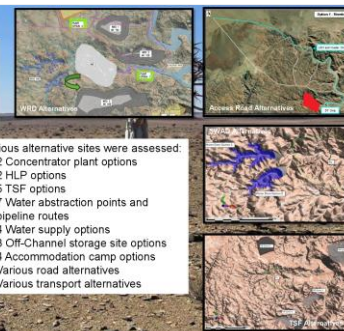
Planned/Ongoing Specialist Studies

- Terrestrial Biodiversity – PC
- Aquatic Ecology – KP
- Hydrology (Surface Water) - KP
- Hydrogeology – KP
- Geochemistry - KP
- Archaeology and Heritage – JK
- Social Studies – Urban Dynamics
- Air Quality/Noise – WKC
- Water Resources and Water Demand - WRP
- Routing monitoring programme - KP

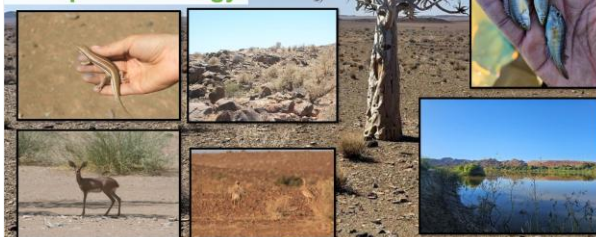
Alternatives / Trade-Off Analysis



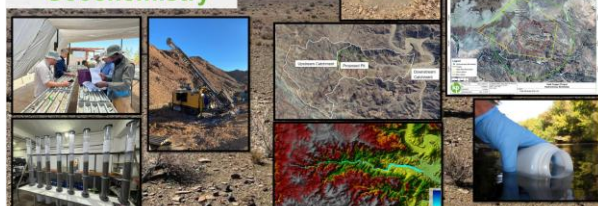
- Various alternative sites were assessed:
- 2 Concentrator plant options
 - 2 HLP options
 - 5 TSF options
 - 7 Water abstraction points and pipeline routes
 - 4 Water supply options
 - 3 Off-Channel storage site options
 - 4 Accommodation camp options
 - Various road alternatives
 - Various transport alternatives



Terrestrial and Aquatic Ecology



Hydrology, Hydrogeology, Geochemistry



Archaeology / Heritage



Air Quality and Noise



Identified Impacts and Mitigation

Potential Impacts/Mitigation: Design facility and operate as per mitigation hierarchy

Impacts	Mitigation
Transformation of habitats	On-going restoration/rehabilitation
Change in biodiversity / Loss of species	Demarcate sensitive areas and declare these as "no go" areas
Change in surface and ground water quality (sedimentation, contamination, leaching)	Zero tolerance on hunting/ collection/ harvesting
Change in water availability (Abstraction)	Runoff and contaminant management
Soil impacts	Seepage interception for WQ monitoring and recycle to process
Impact on heritage resources	Spill kits and permeability management
Change in noise levels	Robust tailings dam design / Avoid failure
Change in air quality (Dust and Emissions)	Implement water demand and water conservation measures
Changes in traffic volumes	Off channel storage
Influx of people to the area	Protection of aquifers
Socio economic changes	Implement erosion control measures
	Implement storm water management measures (culverts and drains)
	Implement a Chance Find Procedure
	Working hours restricted / Noise standards
	Dust / Emissions Management
	Traffic management plans
	Workforce management plans
	Community management plans
	Job opportunities

Register and Contribute

- Please register and provide comments, issues or concerns to:

- Heidri Nel
- +264 81 651 7336
- esiahaib@udanam.com
- Joseph Mulders / Lima Maartens
- +27 72 754 2603 / +264 (0)61 255750
- haibesia@knightpiesold.com

Inputs from this PPP will inform the scoping report which will be made available online

<https://www.knightpiesold.com/pa/haib/> and <https://www.koryxcopper.com/project-overview/social-and-environmental/> for a public review period of 30 days.

Registered I&APs will be informed of the review period dates and details via email and sms.

Questions

THANK YOU

Amelia Briel
Abriel@knightpiesold.com

APPENDIX C.2 SCOPING PHASE MEETING MINUTES

APPENDIX C.2.1 Scoping Phase, National Authority Stakeholder Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – NATIONAL AUTHORITY STAKEHOLDER MEETING

Date: 08 August 2025 **File No.:** UDA 1281
Time: 09:00–12:00 **Cont. No.:**
Place: Opera House, Windhoek
Note Taker: Heidri Nel

Participants:	Eleven participants attended the meeting, representing national government ministries, state-owned enterprises, planning authorities, non-governmental organisations, international stakeholders, Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal information has been omitted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	Welcome
	Knight Piésold Consulting (KP) welcomed all participants and thanked them for attending the National Authority Meeting.
2.0	Introduction of participants
	Representatives of the project team and participating organisations introduced themselves.
3.0	Objectives
	Veronique Daigle (KP) explained the objectives of the meeting, namely to introduce the proposed Haib Copper Project, explain the Environmental and Social Impact Assessment (ESIA) process, present the proposed mining development, and provide an opportunity for authorities and key stakeholders to raise comments, concerns and recommendations for consideration during the ESIA process.
4.0	Haib Copper project presentation
	Trevor Faber and Charles Loots (Koryx Copper), together with Amelia Briel (KP), presented the proposed Haib Copper Project under the following main components:
	• Introduction to Koryx Copper and the Haib Copper Project. • Project location and overview of EPL 3140.

1 of 4

Item No.	Description
	- Proposed mining operation and associated infrastructure. - Environmental and Social Impact Assessment (ESIA) process. - Specialist studies currently underway. - Key environmental and social aspects under consideration. - Stakeholder engagement process and opportunities for participation. - Indicative project programme and next steps.
	Refer to Annexure C.1 for the Scoping Phase Presentation.
5.0	Discussions
	The main points raised during discussions are as follows:
5.1	Representatives of NamPower requested clarification regarding workforce requirements during the construction and operational phases, including proposed accommodation arrangements. Trevor Faber (KC) explained that approximately 2,000–3,000 workers would be required during construction and accommodated in an on-site camp, with the operational workforce expected to comprise approximately 1,000 employees.
5.2	Representatives of NamPower requested clarification regarding the scope of the Environmental and Social Impact Assessment and the assessment of associated infrastructure, including the proposed powerline. Charles Loots (KC) and Amelia Briel (KP) explained that the current ESIA focuses on the proposed mining licence area, while the proposed powerline will be assessed through a separate environmental assessment process undertaken by NamPower.
5.3	Representatives of North South Properties requested information regarding the specialist studies currently underway, including cultural heritage investigations. Amelia Briel (KP) confirmed that specialist studies, including the cultural heritage assessment, are underway and that the findings will inform the ESIA.
5.4	Representatives of North South Properties requested clarification regarding environmental sensitivity and the proposed mitigation approach. Amelia Briel (KP) explained that the ESIA will apply the mitigation hierarchy and assess biodiversity, heritage and other environmental constraints before final project design.
5.5	Representatives of the High Commission of Canada requested clarification regarding opportunities for local value addition and downstream processing associated with the proposed project. Trevor Faber (KC) explained that a large-scale smelter is currently not considered feasible and that value addition will primarily occur through concentrate upgrading together with local economic participation.
5.6	Representatives of the Ministry of Agriculture, Water and Land Reform (MAWLR) requested information regarding the status of the hydro-census and the preferred water supply options for the project. Amelia Briel (KP) confirmed that hydro-census investigations and water resource studies are currently underway, including investigations of the Orange River and Naute Dam as potential water sources.
5.7	Representatives of NamPower requested clarification regarding the proposed transport logistics and export routes for copper concentrate.

Item No.	Description
	Charles Loots (KC) explained that concentrate transport options and the associated traffic impacts are currently being assessed as part of the Environmental and Social Impact Assessment.
5.8	Representatives of NamPower requested information regarding the proposed electricity supply and the potential integration of renewable energy into the project. Trevor Faber (KC) explained that renewable energy options, including solar energy, are being investigated to supplement the project's grid electricity supply.
5.9	Representatives of North South Properties emphasised the importance of coordinating with existing regional and community structures throughout project planning and implementation. Charles Loots (KC) confirmed that the project intends to work through existing regional and local structures and maintain ongoing engagement with relevant government institutions, local authorities and other stakeholders
5.10	Representatives of the High Commission of Canada requested clarification regarding the anticipated project development programme and implementation timeline. Trevor Faber (KC) explained that preliminary project studies are currently underway and that project development is anticipated to proceed in phases following the completion of feasibility studies, environmental permitting and the necessary regulatory approvals.
	The detailed issues raised and responses provided by the Project Team are documented in the Stakeholder Engagement Report.
6.0	Summary of decisions
6.1	Stakeholders were invited to submit additional written comments during the Scoping Phase.
6.2	Knight Piésold Consulting will continue the specialist studies to inform the Environmental and Social Impact Assessment.
6.3	Urban Dynamics Africa will record all comments received in the Issues and Concerns Register for consideration during the assessment process.
6.4	The Project Team will continue consultation with key stakeholders throughout the ESIA process.
6.5	Meeting minutes will be retained as part of the consultation record and ongoing communication will be maintained with registered Interested and Affected Parties (I&APs).
7.0	Meeting closure
7.1	KP thanked all participants for their attendance and valuable contributions. The meeting was formally closed.



Attendance Register

(personal contact details redacted from the public version)

URBAN DYNAMICS

KORYX COPPER

Knight Piésold CONSULTING

DATE: 08/08/25

TIME: 9:00- 12:00

PURPOSE OF MEETING: ESIA for Halib Copper Mine Project

VENUE: Opera House, The Village, Windhoek

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		NAMPOWER	SNR ENG			
		Halib Copper Properties	SNR Project Manager			
		Halib Copper	Planning			
		NAMPOWER	Senior Hydrogeologist			
		NAMPOWER	Section Hydrogeologist			
		North South Properties	DIRECTOR			
		KORYX	SNR Geologist			
		H. C. C. Arica	Trade Commission			
		NAMPOWER	Hydrogeologist			
		NAMPOWER	Hydrogeologist			

Photographic Record



APPENDIX C.2.2 Scoping Phase, Public Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – PUBLIC MEETING (NOORDOEWER)

Date: 08 August 2025 **File No.:** UDA 1281
Time: 17:30–19:30 **Cont. No.:**
Place: EHW Baard Primary School, Noordoewer
Note Taker: Heidri Nel

Participants:	Twenty-two participants attended the meeting, representing community members, educational institutions, local businesses, government, Interested and Affected Parties (I&APs), Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	Welcome
	Knight Piésold Consulting (KP) welcomed all participants and thanked them for attending the Public Meeting. The purpose of the meeting and the consultation process were explained, and participants were encouraged to actively participate by raising questions, concerns and recommendations relating to the proposed Haib Copper Project.
2.0	Introduction of participants
	Representatives of the Project Team introduced themselves, after which community members and stakeholders introduced themselves. Participants were requested to complete the attendance register
3.0	Objectives
	Kutlo Modie (KP) explained the objectives of the meeting, namely to introduce the proposed Haib Copper Project, explain the Environmental and Social Impact Assessment (ESIA) process, present the proposed mining development and associated infrastructure, outline the specialist studies currently underway, and provide community members and stakeholders with an opportunity to raise comments, concerns and recommendations for consideration during the ESIA process

Item No.	Description
4.0	Haib Copper project presentation
	Trevor Faber (Koryx Copper) and Amelia Briel (Knight Piésold Consulting) presented the proposed Haib Copper Project under the following main components:
	• Introduction to Koryx Copper and the Haib Copper Project. • Project location and overview of EPL 3140. • Proposed mining operation and associated infrastructure. • Environmental and Social Impact Assessment (ESIA) process. • Specialist studies currently underway. • Key environmental and social aspects under consideration. • Stakeholder engagement process and opportunities for participation. • Indicative project programme and next steps. All comments, questions and recommendations raised during the meeting were recorded and incorporated into the project's Issues and Concerns Register to inform the Environmental and Social Impact Assessment.
	Refer to the attached PowerPoint Presentation for the contents of the presentation.
5.0	Discussions
	The main points raised during discussions are as follows:
5.1	Community stakeholders requested clarification regarding the long-term safety of the proposed open pit following mine closure and the measures that would be implemented to protect future users of the area. Trevor Faber (KC) explained that the open pit is expected to remain after mine closure and that rehabilitation and closure planning will incorporate long-term safety measures, access control and consideration of appropriate future land uses.
5.2	Community stakeholders requested information regarding education, training and skills development opportunities for local residents, particularly young people. Trevor Faber (KC) explained that Koryx Copper intends to engage with the Ministry of Education to explore skills development initiatives, job-shadowing opportunities and training programmes aligned with the requirements of the mining sector.
5.3	Community stakeholders emphasised the importance of creating employment opportunities for local youth and requested clarification regarding recruitment and workforce planning. Amelia Briel (KP) explained that employment opportunities and skills development initiatives for local youth will be considered as part of workforce planning and the broader Social Impact Assessment.
5.4	Community stakeholders raised concerns regarding public safety associated with the proposed open pit during operation and after mine closure. Trevor Faber (KC) explained that long-term pit stability, fencing, controlled access and other safety measures will form part of the mine closure planning process and will be developed in accordance with regulatory requirements.
5.5	Community stakeholders requested clarification regarding whether copper would be processed locally or exported in its raw form.

Item No.	Description
	Trevor Faber (KC) explained that copper concentrate will be upgraded prior to export, allowing for a degree of value addition within Namibia before the product is exported for further processing.
	The Project Team took note of the issues, concerns and recommendations raised during the discussion and confirmed that these would be documented and considered, where relevant, through the Environmental and Social Impact Assessment process and the associated specialist studies. All comments, questions and recommendations raised during the meeting were recorded in the project's Issues and Concerns Register.
6.0	Summary of decisions
6.1	Stakeholders were invited to submit additional written comments during the Scoping Phase.
6.2	Knight Piésold Consulting will continue the specialist studies to inform the Environmental and Social Impact Assessment.
6.3	Urban Dynamics Africa will record all comments received in the Issues and Concerns Register for consideration during the assessment process.
6.4	The Project Team will continue consultation with key stakeholders throughout the ESIA process.
6.5	Meeting minutes will be retained as part of the consultation record and ongoing communication will be maintained with registered Interested and Affected Parties (I&APs).
7.0	Meeting closure
7.1	Knight Piésold Consulting thanked all participants for their attendance, constructive participation and valuable contributions.

Attendance Register

(personal contact details redacted from the public version)

DATE:	11/08/25	TIME:	17:30 - 19:30
PURPOSE OF MEETING:	ESIA for Haib Copper Mine Project - Noordoewer Community Meeting	VENUE:	Baard Primary School, Noordoewer

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Benagri	Clerk			
		NCC	Chairperson			
		Community	Teacher			
		Shop P.	Wages Officer			
			Teacher			
			Mechanic			
		CRAMES	Coordinator			
		Orange Shop	Shop worker			



Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Shell s s	Manager			
			Guard			
			Guard			
			Teacher			
			Teacher			
			builder			
			builder			
			UNEMPLOYED			
			unemployed			
			UNEMPLOYED			
		EMW Road P.S.	School Principal			



Name	Surname	Organisation	Position	Contact number	Email address	Signature
			security			

Photographic Record



APPENDIX C.2.3 Scoping Phase, Women's Focus Group Discussion



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – WOMEN'S FOCUS GROUP DISCUSSION

Date: 11 August 2025 **File No.:** UDA 1281
Time: Following the Public Meeting **Cont. No.:**
Place: EHW Baard Primary School, Noordoewer
Note Taker: Heidri Nel

Participants:	The Women's Focus Group Discussion formed part of the Public Meeting held on 11 August 2025. Participants represented women from the Noordoewer community and participated in the discussion together with representatives of Knight Piésold Consulting and Urban Dynamics Africa. Attendance was recorded on the Public Meeting attendance register (refer to Annexure C.2.3). Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	Welcome
	Amelia Briel (Knight Piésold Consulting) welcomed the participants and explained that the Women's Focus Group Discussion formed part of the broader Public Meeting and provided an opportunity for women to discuss community-specific issues, concerns and expectations relating to the proposed Haib Copper Project.
2.0	Introduction of participants
	Participants introduced themselves and the format of the facilitated discussion was explained.
3.0	Objectives
	The objective of the discussion was to obtain the perspectives of women regarding the potential social and economic impacts of the proposed project and to identify issues that should be considered during the Environmental and Social Impact Assessment.
4.0	Facilitated Discussion
	The discussion was conducted primarily in Afrikaans and focused on the following themes:
	Social wellbeing within the community.

1 of 3

Item No.	Description
	- Youth-related concerns. - Housing pressures. - Unemployment. - Education, skills development and empowerment opportunities. - Community expectations regarding the proposed project
	Refer to the attached PowerPoint Presentation for the contents of the presentation.
5.0	Discussions
	The main points raised during discussions are as follows:
5.1	Amelia Briel (KP) invited participants to discuss existing community support initiatives within Noordoewer. Participants explained that limited formal social programmes currently exist within the community, with support largely provided through informal community and church initiatives, including assistance to elderly residents. Participants emphasised the need for broader and more sustainable community development programmes.
5.2	Amelia Briel (KP) requested participants to identify key social challenges affecting the community. Participants identified alcohol and drug misuse among young people as a significant concern contributing to family conflict, domestic abuse and broader social instability. Participants expressed concern that these challenges could increase with future in-migration associated with the project.
5.3	Participants noted that teenage pregnancy has reportedly declined in recent years; however, concerns remain that the trend could reverse without continued youth support programmes, education and social development initiatives.
5.4	Amelia Briel (KP) facilitated a discussion regarding housing and future population growth. Participants explained that Noordoewer is already experiencing significant housing shortages, with rental costs reportedly increasing from approximately N\$2,000 to N\$5,000 per month. Seasonal workers were also identified as contributing to existing accommodation pressures..
5.5	Participants explained that the limited number of retail facilities within Noordoewer reduces access to goods and contributes to higher prices for household items and essential commodities.
5.6	Participants highlighted the importance of empowerment programmes, practical training opportunities and skills development initiatives to ensure that local residents, particularly women, are able to benefit from future employment and economic opportunities associated with the proposed project.
5.7	Participants highlighted high levels of unemployment and limited access to career guidance and training opportunities for local youth. Participants recommended career awareness programmes, career expos, vocational training and improved access to information regarding employment pathways within the mining sector.
	The Project Team took note of the concerns and recommendations raised during the discussion and confirmed that these would be documented and considered, where relevant, through the Environmental and Social Impact Assessment process and the associated specialist studies. All comments and recommendations were recorded in the project's Issues and Concerns Register.

Item No.	Description
6.0	Summary of decisions
6.1	Participants were encouraged to continue engaging with the Project Team throughout the ESIA process.
6.2	Knight Piésold Consulting will continue the specialist studies to inform the Environmental and Social Impact Assessment.
6.3	Urban Dynamics Africa will record all comments received in the Issues and Concerns Register for consideration during the assessment process.
6.4	The Project Team will continue consultation with key stakeholders throughout the ESIA process.
6.5	Meeting minutes will be retained as part of the consultation record and ongoing communication will be maintained with registered Interested and Affected Parties (I&APs).
7.0	Meeting closure
7.1	Amelia Briel thanked all participants for openly sharing their experiences, concerns and recommendations. The discussion was formally concluded.

Attendance Register

Note: The Women's Focus Group Discussion formed part of the Public Meeting held on 11 August 2025. Participants signed the Public Meeting attendance register prior to the commencement of the breakout discussion. Refer to Annexure C.2.3 – Public Meeting Attendance Register.

Photographic Record



3 of 3

11 August 2025

APPENDIX C.2.4 Scoping Phase, Business, Farmers and Tourism Focus Group Discussions



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – BUSINESS, FARMERS AND TOURISM FOCUS GROUP DISCUSSION

Date: 12 August 2025 **File No.:** UDA 1281
Time: 09:00–11:30 **Cont. No.:**
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

Participants:	Seventeen participants attended the meeting, representing the agricultural, business, tourism, accommodation and fuel retail sectors within Noordoewer and the surrounding areas, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	Welcome
	Kutlo Modie (Knight Piésold Consulting) welcomed all participants and thanked them for attending the Business, Farmers and Tourism Focus Group Discussion. The purpose of the meeting and the consultation process were explained, and participants were encouraged to openly discuss matters relating to agriculture, business, tourism and the proposed Haib Copper Project.
2.0	Introduction of participants
	Representatives of the Project Team introduced themselves, after which community members and stakeholders introduced themselves. Participants were requested to complete the attendance register
3.0	Objectives
	Kutlo Modie (KP) explained the objectives of the meeting, namely to introduce the proposed Haib Copper Project, explain the Environmental and Social Impact Assessment (ESIA) process, present the proposed mining development and associated infrastructure, outline the specialist studies currently underway, and provide community members and stakeholders with an opportunity to raise comments, concerns and recommendations for consideration during the ESIA process

1 of 5

Item No.	Description
4.0	Haib Copper project presentation
	Trevor Faber (Koryx Copper) and Amelia Briel (Knight Piésold Consulting) presented the proposed Haib Copper Project under the following main components:
	• Introduction to Koryx Copper and the Haib Copper Project. • Project location and overview of EPL 3140. • Proposed mining operation and associated infrastructure. • Environmental and Social Impact Assessment (ESIA) process. • Specialist studies currently underway. • Key environmental and social aspects under consideration. • Stakeholder engagement process and opportunities for participation. • Indicative project programme and next steps.
	Refer to Annexure C.1 for the Scoping Phase Presentation.
5.0	Discussions
	The presentation was followed by an open discussion and question-and-answer session. The main points raised during discussions are as follows:
5.1	Agricultural and business stakeholders requested information regarding workforce requirements during construction and operations and raised concerns regarding potential competition with the agricultural labour market. Trevor Faber (KC) explained that approximately 2,000–3,000 workers would be required during construction, reducing to approximately 1,000–1,500 workers during operations.
5.2	Agricultural and business stakeholders raised concerns regarding potential pressure on local housing and accommodation. Trevor Faber (KC) explained that construction workers would primarily be accommodated in prefabricated on-site facilities, while alternative workforce accommodation models may be considered during operations.
5.3	Agricultural stakeholders expressed concern that higher mining wages could negatively affect agricultural labour retention and increase operating costs. Trevor Faber (KC) explained that relatively few unskilled workers would be employed and that workforce planning and skills mapping would be undertaken.
5.4	Agricultural stakeholders requested confirmation regarding biodiversity studies undertaken along the Orange River and whether the findings could be shared to support agricultural compliance requirements. Amelia Briel (KP) confirmed that the biodiversity studies have been completed and that relevant findings may be shared with stakeholders, where appropriate.
5.5	Agricultural stakeholders identified water availability and irrigation supply as major concerns and questioned whether the project's water demand could affect existing Orange River allocations. Trevor Faber (KC) explained that water storage options, alternative water supply sources and wastewater reuse opportunities are currently being investigated
5.6	5.6 Agricultural stakeholders raised concerns regarding potential contamination risks and referred to lessons learnt from other mining operations.

Item No.	Description
	Amelia Briel (KP) confirmed that geochemical and water quality investigations form part of the specialist assessment programme and that relevant findings may be shared with stakeholders, where appropriate.
5.7	Agricultural stakeholders requested clarification regarding potential seepage and groundwater impacts. Amelia Briel (KP) confirmed that seepage and groundwater investigations form part of the specialist assessment programme
5.8	Agricultural stakeholders requested access to technical studies and written clarification regarding water allocations and responsibilities. Trevor Faber (KC) and Amelia Briel (KP) confirmed that relevant technical information would be shared, where appropriate, and that engagement with stakeholders and the relevant authorities would continue throughout the ESIA process.
5.9	Business and agricultural stakeholders raised concerns regarding electricity demand and the potential impacts of the proposed project on local power supply and electricity tariffs. Trevor Faber (KC) explained that supplementary power infrastructure and renewable energy options are being investigated as part of the project planning process.
5.10	Business and agricultural stakeholders requested clarification regarding whether project infrastructure could remain available for community or agricultural benefit after mine closure. Trevor Faber (KC) confirmed that closure planning will consider the retention of infrastructure where feasible and subject to regulatory approval.
5.11	Business and agricultural stakeholders requested clarification regarding whether project infrastructure could remain available for community or agricultural benefit after mine closure. Trevor Faber (KC) confirmed that closure planning will consider the retention of infrastructure where feasible and subject to regulatory approval.
	Business and tourism stakeholders noted that increased irrigation and operating costs could indirectly affect tourism businesses and local economic sustainability. Participants requested continued engagement with the private sector to better understand cumulative impacts and identify appropriate mitigation measures. The Project Team took note of these concerns and confirmed that they would be documented and considered, where relevant, through the Environmental and Social Impact Assessment process.
6.0	Summary of decisions
6.1	Stakeholders were invited to submit additional written comments during the Scoping Phase.
6.2	Knight Piésold Consulting will continue the specialist studies and incorporate stakeholder input into the Environmental and Social Impact Assessment, where relevant.
6.3	Urban Dynamics Africa will record all comments received in the Issues and Concerns Register for consideration during the assessment process.
6.4	The Project Team will continue engagement with the agricultural, business and tourism sectors throughout the ESIA process.
6.5	Meeting minutes will be retained as part of the consultation record and ongoing communication will be maintained with registered Interested and Affected Parties (I&APs).



Knight Piésold
CONSULTING

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Karsten	Manager			
		AVF.	Manager			
		Burkhardt	M.B.			
		Prosser				
		G.M.T.S	owner			
		Sandkutan	Manager			



Name	Surname	Organisation	Position	Contact number	Email address	Signature
		VRW	Owner			
		Sony kg	PM			
		Bundzi	PM			
		Sonop	Owner			
		Sheil	Manager			
		Vile Energy	Business Development			
		Twongen	Manager			
		Bengani	Owner			
		Noordewer Guesthouse	Manager			

Photographic Record



APPENDIX C.2.5 Scoping Phase, Bondelswarts Traditional Authority Focus Group Discussion



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – BONDELSWARTS TRADITIONAL AUTHORITY FOCUS GROUP DISCUSSION

Date: 12 August 2025 **File No.:** UDA 1281
Time: 11:30:00–13:00 **Cont. No.:**
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

Participants:	Seven participants attended the meeting, comprising five representatives of the Bondelswarts Traditional Authority and two regional youth representatives, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	Welcome
	Kutlo Modie (KP) welcomed all participants and thanked them for attending the Bondelswarts Traditional Authority Focus Group Discussion. The purpose of the meeting and the consultation process were explained, and participants were encouraged to openly discuss issues relating to traditional leadership, communal land, cultural heritage, youth development and the proposed Haib Copper Project.
2.0	Introduction of participants
	Representatives of the Project Team introduced themselves, after which representatives of the Bondelswarts Traditional Authority and youth representatives introduced themselves. Participants were requested to complete the attendance register.
3.0	Objectives
	Kutlo Modie (KP) explained the objectives of the meeting, namely to introduce the proposed Haib Copper Project, explain the Environmental and Social Impact Assessment (ESIA) process, present the proposed mining development and associated infrastructure, outline the specialist studies currently underway, and provide Traditional Authority representatives and youth representatives with an opportunity to raise comments, concerns and recommendations for consideration during the ESIA process.

1 of 4

Item No.	Description
4.0	Haib Copper project presentation
	Trevor Faber (Koryx Copper) and Amelia Briel (Knight Piésold Consulting) presented the proposed Haib Copper Project under the following main components:
	• Introduction to Koryx Copper and the Haib Copper Project. • Project location and overview of EPL 3140. • Proposed mining operation and associated infrastructure. • Environmental and Social Impact Assessment (ESIA) process. • Specialist studies currently underway. • Key environmental and social aspects under consideration. • Stakeholder engagement process and opportunities for participation. • Indicative project programme and next steps.
	Refer to Annexure C.1 for the Scoping Phase Presentation.
5.0	Discussions
	The presentation was followed by an open discussion and question-and-answer session. The main points raised during discussions are as follows:
5.1	Water resource management, water abstraction and potential impacts on communal and agricultural water users.
5.2	Broader stakeholder engagement and the continued involvement of Traditional Authorities and district structures throughout the ESIA process.
5.3	Recognition of communal land rights, land access and compensation arrangements for project infrastructure.
5.4	Local processing of copper concentrate and opportunities for value addition within Namibia.
5.5	Mine closure planning, rehabilitation and post-closure land use opportunities.
5.6	Environmental health and safety concerns relating to pits, dust, seepage, traffic and associated infrastructure.
5.7	The role of the Traditional Authority in project planning, consultation and decision-making.
5.8	Inclusivity and mechanisms to ensure local communities benefit from the proposed project.
5.9	Youth training, employment readiness and opportunities for skills development.
5.10	Protection of graves, ceremonial areas and culturally significant heritage sites.
5.11	Groundwater management and communal water access.
5.12	Respect for communal boundaries and Traditional Authority jurisdiction.
5.13	Employment readiness, skills development and in-service training opportunities for local youth.
5.14	Community benefit-sharing mechanisms and local development opportunities.
5.16	Early implementation of community support and development initiatives prior to mining operations.
	The Project Team noted the issues, concerns and recommendations raised by participants and confirmed that these would be documented and considered, where relevant, during the Environmental and Social Impact Assessment process and the associated specialist studies
6.0	Summary of decisions
6.1	Stakeholders were invited to submit additional written comments during the Scoping Phase.

 Knight Piésold
CONSULTANTS

ATTENDANCE REGISTER

1281-NamWater EIA SER
1 September 2026

Photographic Record



APPENDIX C.2.6 Scoping Phase, Constituency Development Committee Focus Group Discussion



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – CONSTITUENCY DEVELOPMENT COMMITTEE (CDC) FOCUS GROUP DISCUSSION

Date: 12 August 2025 **File No.:** UDA 1281
Time: 14:00–16:30 **Cont. No.:**
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

Participants:	Eleven participants attended the meeting, representing the Constituency CDC, community representatives, education representatives, Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	Welcome Kutlo Modie (Knight Piésold Consulting) welcomed all participants and thanked them for attending the Constituency Development Committee Focus Group Discussion. The purpose of the meeting and the consultation process were explained, and participants were encouraged to openly discuss issues relating to community development, infrastructure, employment and the proposed Haib Copper Project.
2.0	Introduction of participants Representatives of the Project Team introduced themselves, after which representatives of the Constituency Development Committee and participating organisations introduced themselves. Participants were requested to complete the attendance register.
3.0	Objectives Kutlo Modie (KP) explained the objectives of the meeting, namely to introduce the proposed Haib Copper Project, explain the Environmental and Social Impact Assessment (ESIA) process, present the proposed mining development and associated infrastructure, outline the specialist studies currently underway, and provide Traditional Authority

Item No.	Description
	representatives and youth representatives with an opportunity to raise comments, concerns and recommendations for consideration during the ESIA process.
4.0	Haib Copper project presentation
	Trevor Faber (Koryx Copper) and Amelia Briel (Knight Piésold Consulting) presented the proposed Haib Copper Project under the following main components:
	• Introduction to Koryx Copper and the Haib Copper Project. • Project location and overview of EPL 3140. • Proposed mining operation and associated infrastructure. • Environmental and Social Impact Assessment (ESIA) process. • Specialist studies currently underway. • Key environmental and social aspects under consideration. • Stakeholder engagement process and opportunities for participation. • Indicative project programme and next steps.
	Refer to Annexure C.1 for the Scoping Phase Presentation.
5.0	Discussions
	The presentation was followed by an open discussion and question-and-answer session. The main points raised during discussions are as follows:
5.1	Local procurement opportunities and participation of local businesses and SMEs.
5.2	Housing, worker accommodation and the future use of mine-related infrastructure following mine closure.
5.3	Social impacts on schools, youth, community wellbeing and public services.
5.4	Youth awareness, career guidance and opportunities for exposure to the mining sector.
5.5	Community expectations regarding corporate social responsibility (CSR) initiatives and social investment.
5.6	Long-term ownership of the project and continuity of community commitments.
6.0	Summary of decisions
6.1	Stakeholders were invited to submit additional written comments during the Scoping Phase.
6.2	Knight Piésold Consulting will continue the specialist studies and incorporate stakeholder input into the Environmental and Social Impact Assessment, where relevant.
6.3	Urban Dynamics Africa will record all comments received in the Issues and Concerns Register for consideration during the assessment process.
6.4	The Project Team will continue engagement with the Constituency Development Committee and other local stakeholders throughout the ESIA process.
6.5	Meeting minutes will be retained as part of the consultation record and ongoing communication will be maintained with registered Interested and Affected Parties (I&APs).
6.6	The Project Team will continue to share relevant technical information and specialist study findings, where appropriate, and maintain transparent engagement with stakeholders throughout the ESIA process.
7.0	Meeting closure
7.1	Kutlo Modie thanked all participants for their attendance, constructive participation and valuable contributions. The meeting was formally closed.



Attendance Register

(personal contact details redacted from the public version)

DATE:	12/08/25	TIME:	14:00- 15:30
PURPOSE OF MEETING:	ESIA for Haib Copper Mine Project - Focus Group Discussion – Constituency Development Committee	VENUE :	Noordoewer Guesthouse, Noordoewer

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		CDC	community Rep			
		Settlement Office	Senior Admin			
		Control Admin	Control Admin			
		Kansburg West Constituency	Senior Admin			
		Aussentekehr Primary School	Principal			
		School Principal	School Principal			
		CDC Member	School Principal			
		School	Principal			
		CDC Member	Principal			
		NamRA	Principal			
		CDC	Business			
		CDC	Business			

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Photographic Record



APPENDIX C.2.7 Scoping Phase, Noordoewer Community Representative Committee



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – REGIONAL AUTHORITY MEETING

Date: 12 August 2025 **File No.:** UDA 1281
Time: 17:30–18:30 **Cont. No.:**
Place: Regional Council Office, Keetmanshoop
Note Taker: Heidri Nel

Participants:	A total of 26 participants attended the meeting, comprising representatives of the //Kharas Regional Council, NamWater, NamRA, NamPost, the Roads Authority, NamPower, the Namibia Statistics Agency, the Office of the Ombudsman and various government ministries and agencies, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal names, contact details and signatures have been excluded from the public version of the stakeholder engagement record
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Kutlo Modie (KP) opened the meeting, welcomed the NCRC representatives and thanked them for attending the informal focus group discussion.
1.2	Kutlo Modie (KP) briefly explained that the meeting formed part of the Scoping Phase stakeholder engagement process for the proposed Haib Copper Project ESIA. Participants were encouraged to openly raise questions, concerns and recommendations.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Kutlo Modie (KP) invited those present to introduce themselves. The representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa introduced themselves, after which the NCRC representatives introduced themselves.
2.2	Participants were requested to complete the attendance register. Four NCRC representatives attended the meeting.
3.0	PURPOSE OF THE MEETING AND INFORMAL PROJECT OVERVIEW

1 of 4

Item No.	Description
3.1	Kutlo Modie (KP) explained that the purpose of the meeting was to engage directly with the NCRC and provide its representatives with an opportunity to raise local issues, concerns and recommendations regarding the proposed Haib Copper Project.
3.2	Trevor Faber (KC) provided a brief informal overview of the proposed Haib Copper Project and responded to general Project-related questions as the discussion progressed.
3.3	Amelia Briel (KP) briefly explained the ESIA process and provided environmental and social assessment input in response to matters raised by the NCRC representatives.
3.4	Kutlo Modie (KP) invited the NCRC representatives to raise questions and concerns for discussion. No formal presentation was delivered, and the meeting proceeded as an open focus group discussion.
4.0	HAIB COPPER PROJECT AND ESIA PRESENTATION
4.1	Trevor Faber (KC) provided an overview of the proposed Haib Copper Project, including the Project location, proposed mining activities, associated infrastructure and anticipated Project development.
4.2	Amelia Briel (KP) provided an overview of the ESIA process, including the purpose of the Scoping Phase, the identification of potential environmental and social impacts and the specialist studies to be undertaken.
4.3	Kutlo Modie (KP) invited the NCRC representatives to raise questions, concerns and recommendations regarding the proposed Project and matters requiring consideration during the ESIA process.
5.0	DISCUSSION
5.1	Open Pit Safety and Post-Closure Management
5.1.1	NCRC representatives requested clarification on whether the open pit would remain after mine closure and how long-term risks to the community would be managed.
5.1.2	Trevor Faber (KC) explained that the open pit would remain after closure. Closure planning would include measures for long-term safety, restricted access and consideration of post-mining land use.
5.2	Youth Employment and Skills Development
5.2.1	NCRC representatives requested information on the opportunities that the proposed Project could create for young people in Noordoewer.
5.2.2	Amelia Briel (KP) explained that youth skills mapping would be undertaken and that training and employment pathways would be linked to the Project's anticipated skills and workforce requirements.
5.3	Women's Development and Social Initiatives
5.3.1	NCRC representatives asked whether the Project would support women's development and broader community-based social initiatives.
5.3.2	Trevor Faber (KC) noted the request and explained that future corporate social responsibility planning would consider women's empowerment and support for appropriate community-led initiatives.
5.4	Community Social Challenges

Item No.	Description
5.4.1	NCRC representatives raised concerns regarding existing social challenges in Noordoewer, including alcohol and drug abuse and teenage pregnancy, and asked how the proposed Project could assist in addressing these concerns.
5.4.2	Amelia Briel (KP) acknowledged these as serious social concerns and explained that they would be considered through the Social Impact Assessment and linked, where appropriate, to local programmes and mitigation measures.
5.5	Housing Availability and Rental Pressure
5.5.1	NCRC representatives raised concerns regarding the existing shortage of housing and the potential for the Project workforce to increase demand for accommodation and contribute to rising rental costs.
5.5.2	Trevor Faber (KC) explained that construction workers would be accommodated in on-site prefabricated units. A longer-term housing strategy for the operational phase remained under consideration.
5.6	Local Business and Economic Opportunities
5.6.1	NCRC representatives asked whether small shops and businesses in Noordoewer would benefit from the proposed mine.
5.6.2	Trevor Faber (KC) explained that local SMEs would be surveyed and considered in procurement planning and that the mine would give preference to Namibian suppliers.
5.7	Key Matters Raised
5.7.1	The discussion highlighted concerns regarding long-term open pit safety, youth employment and skills development, women's empowerment, existing social challenges, pressure on housing and rental costs, and opportunities for local businesses.
5.7.2	Kutlo Modie (KP) confirmed that the issues and concerns raised during the meeting would be documented as part of the Scoping Phase stakeholder engagement record and considered during the ESIA process.
6.0	FOLLOW-UP MATTERS
6.1	Amelia Briel (KP) confirmed that the environmental and social issues raised during the meeting would be considered, where relevant, during the ESIA and specialist assessment processes.
6.2	Trevor Faber (KC) noted the matters raised regarding youth opportunities, women's development, workforce accommodation and local business participation for consideration as Project planning progressed.
6.3	Kutlo Modie (KP) encouraged the NCRC representatives to remain engaged during the ESIA process and to submit any additional comments or concerns.
7.0	MEETING CLOSURE
7.1	Kutlo Modie (KP) thanked the NCRC representatives for their attendance and contributions. Participants were encouraged to remain engaged throughout the ESIA process. The meeting was formally closed.



Attendance Registers

(personal contact details redacted from the public version)



DATE:	12/08/25	TIME:	17:30- 18:30
PURPOSE OF MEETING:	ESIA for Halib Copper Mine Project - Focus Group Discussion – Community Development Committee	VENUE :	Noordoewer Guesthouse, Noordoewer

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		NREC				
		NREC	Chairperson			
		NREC	Secretary			
		NCCR				

Photographic Record



APPENDIX C.2.8 Scoping Phase, Regional Authority Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

SCOPING PHASE – REGIONAL AUTHORITY MEETING

Date: 13 August 2025 **File No.:** UDA 1281
Time: 10:00–12:00 **Cont. No.:**
Place: Regional Council Office, Keetmanshoop
Note Taker: Heidri Nel

Participants:	A total of 26 participants attended the meeting, comprising representatives of the //Kharas Regional Council, NamWater, NamRA, NamPost, the Roads Authority, NamPower, the Namibia Statistics Agency, the Office of the Ombudsman and various government ministries and agencies, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal names, contact details and signatures have been excluded from the public version of the stakeholder engagement record
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Mr Ralph Sachika, Acting Chief Regional Officer (CRO) of the //Kharas Regional Council, opened and facilitated the meeting. He welcomed participants and thanked representatives of regional authorities, government ministries, public institutions and the Project Team for attending.
1.2	The Acting CRO provided the Project Team with an opportunity to introduce the proposed Haib Copper Project and the ESIA process and encouraged participants to raise questions, concerns and recommendations for consideration during the assessment process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	The Acting CRO invited members of the Project Team and stakeholder representatives to introduce themselves and indicate the organisations they represented.
2.2	Participants were requested to complete the attendance register. The attendance register is retained as part of the stakeholder engagement record. Personal contact details and signatures are excluded or redacted from the public version.

1 of 7

Item No.	Description
3.1	The Project Team explained that the meeting formed part of the Scoping Phase stakeholder engagement process for the proposed Haib Copper Project ESIA.
3.2	The purpose of the meeting was to introduce the proposed Project and ESIA process to regional authorities and relevant government institutions and to provide stakeholders with an opportunity to identify environmental, social, economic, institutional and technical matters requiring consideration during the assessment process.
3.3	The objectives were to provide an overview of the proposed Project; explain the ESIA and stakeholder engagement processes; identify key environmental and social issues at an early stage; obtain input from regional authorities and government institutions; and ensure that relevant stakeholder concerns were considered in defining the scope of the ESIA and specialist studies.
3.4	The meeting also provided an opportunity to discuss the Project's anticipated infrastructure and water requirements, regional development considerations and potential interactions between the proposed mining development and other existing and planned activities in the region.
4.0	PRESENTATIONS
4.1	Charles Creasy (KC) presented an overview of the proposed Haib Copper Project, including the anticipated mining development, Project components, infrastructure requirements and development process.
4.2	Amelia Briel (KP) presented the environmental assessment process, including the purpose of the Scoping Phase, the identification of potential environmental and social impacts and the specialist studies to be undertaken.
4.3	Trevor Faber (KC) provided additional Project-related and technical input and responded to stakeholder questions, where relevant.
4.4	Heidri Nel (UDA) supported the stakeholder engagement process and recorded the meeting proceedings and stakeholder comments.
4.5	Stakeholders were invited to raise questions, concerns and recommendations regarding the proposed Project and matters requiring consideration during the ESIA process.
5.0	DISCUSSION
5.1	Long-Term Durability of Project Infrastructure
	A representative of the //Kharas Regional Council raised concern regarding the long-term durability of Project infrastructure and asked whether Project assets would be constructed in accordance with Namibian specifications and designed for a lifespan exceeding 100 years.
	Charles Creasy (KC) explained that Project infrastructure would be developed in accordance with applicable Namibian specifications and relevant engineering requirements, with consideration given to resilience and long-term durability.
5.2	Water Security for Mining and Agriculture
	A representative of NamWater raised questions regarding whether Neckartal Dam and potential irrigation pipelines could provide sufficient water for both the proposed mine and planned irrigation developments.
	Charles Creasy (KC) provided information on the capacity of Neckartal Dam and the anticipated water requirements of the proposed mine. It was explained that regional water availability and

Item No.	Description
	the relationship between mining and irrigation demands were being considered as part of ongoing Project planning and assessment.
5.3	Climate Change, Drought Risk and Competing Water Requirements
	A stakeholder representative raised concern regarding increasing drought risk associated with climate change and the potential pressure that mining water requirements could place on irrigation development, ecosystems and downstream water availability. Questions were raised regarding how water could be secured for the mine without undermining planned irrigation development.
	The Project Team explained that hydrological studies were being undertaken and that the findings would inform future Project planning and water supply considerations. The need to establish a secure and sustainable water supply before the Project could proceed was acknowledged.
5.4	Import and Export Logistics
	A representative of NamRA raised concern regarding the potential for customs and revenue procedures to delay the importation of mining equipment and sought clarification on the arrangements required to facilitate the import of machinery and export of copper products.
	Charles Creasy (KC) explained that clearing agents had been engaged and that liaison with the relevant port, customs and revenue authorities was ongoing. The anticipated import and export arrangements would continue to be developed as Project planning progressed.
5.5	Irrigation Development and Employment Opportunities
	Stakeholders discussed planned irrigation development associated with Neckartal Dam and asked whether the proposed mine could coexist with a large-scale irrigation scheme expected to generate substantial employment opportunities.
	The Project Team explained that the relationship between available water resources, irrigation development and mining requirements would need to be considered through the relevant technical studies and government planning processes. The importance of planned agricultural development and the potential cumulative demand on regional water resources were acknowledged.
5.6	Skills Development, Education and Training
	A representative of the education sector asked whether bursaries, professional training and skills development opportunities would be provided to enable local young people to qualify as engineers, geologists, managers and other professionals required by the Project.
	Charles Creasy (KC) noted the request and indicated that bursary schemes, training initiatives and skills development opportunities would be considered as part of future Project planning.
5.7	Local Processing and Refining of Copper
	A stakeholder representative asked whether copper produced by the proposed mine would be processed and refined in Namibia or exported in an unprocessed form.
	Charles Creasy (KC) provided information on the anticipated processing approach and explained that different processing and export options were being considered. The final approach would depend on technical, commercial and market considerations and the availability of appropriate processing capacity.
5.8	Water Use, Waste and Environmental Risks

Item No.	Description
	A representative of a government ministry raised concern regarding water consumption and waste generated by mining activities and asked whether these could affect regional water supplies and ecosystems.
	Amelia Briel (KP) explained that potential impacts associated with Project water use, waste generation and environmental risks would be assessed through the ESIA and relevant specialist studies. The findings and proposed mitigation measures would be presented during subsequent phases of stakeholder engagement.
5.9	Project Ownership and Governance
	A representative of a government ministry sought clarification on the anticipated ownership and shareholding arrangements between government and private investors.
	Charles Creasy (KC) explained that ownership and investment arrangements remained subject to ongoing Project development and commercial considerations.
5.10	Downstream Water Flows and Environmental Releases
	A representative of the environmental authorities asked whether environmental releases from Neckartal Dam would be maintained to support downstream ecosystems, tourism and other water-dependent activities.
	The Project Team explained that downstream environmental flow requirements would need to be considered in consultation with the relevant water and environmental authorities. The importance of maintaining appropriate downstream releases was acknowledged as a matter requiring consideration in the relevant water and environmental assessment processes.
5.11	Potential Community Health Risks from Base Metals
	A representative of the regional health authorities raised concern regarding potential community health risks associated with exposure to base metals, including lead and zinc, with reference to experiences in other mining areas such as Rosh Pinah. Clarification was requested on how potential exposure risks would be assessed and managed.
	Amelia Briel (KP) acknowledged the concern as an important input to the ESIA process. She explained that the health baseline and relevant assessment work would consider potential exposure pathways, community health risks and appropriate mitigation and management measures.
5.12	Social, Cultural and Livelihood Impacts
	A representative of the mining and energy authorities raised concern regarding the potential social and cultural effects of mining activities. Matters raised included possible restrictions on access to the river, disruption of seasonal heritage movements, wildlife displacement, pressure on livestock, noise and potential disease risks.
	Amelia Briel (KP) acknowledged the significance of the concerns and confirmed that relevant environmental and social matters would be incorporated into the scope of the ESIA and considered during impact assessment and mitigation planning.
5.13	Key Matters Raised
	The discussion highlighted water security as a central issue, particularly the relationship between the proposed mine, planned irrigation development, climate change, drought risk, downstream flow requirements and regional water demand.

Item No.	Description
	Stakeholders also emphasised the importance of durable infrastructure, efficient import and export arrangements, local processing opportunities, education and skills development, community health, environmental protection and the management of potential social, cultural and livelihood impacts.
	The Project Team confirmed that the matters raised would form part of the formal Scoping Phase stakeholder engagement record and would be considered in defining and refining the scope of the ESIA and associated specialist studies.
6.0	FOLLOW-UP MATTERS
6.1	The issues and concerns raised during the meeting will be incorporated into the formal Issues and Concerns Register and considered in defining and refining the scope of the ESIA and relevant specialist studies.
6.2	Water security, including mining demand, irrigation requirements, drought risk, climate change and downstream flow requirements, will continue to be considered through the relevant technical and environmental studies.
6.3	Potential community health risks associated with exposure to metals and other Project-related environmental pathways will be considered through the relevant baseline and impact assessment work.
6.4	Potential social, cultural and livelihood impacts, including access restrictions, heritage movements, livestock pressures, wildlife displacement, noise and disease risks, will be considered during the ESIA process.
6.5	Opportunities relating to local employment, bursaries, training and skills development will continue to be considered as Project planning progresses.
6.6	Stakeholders will continue to be informed of the progress of the ESIA and will be provided with further opportunities to review information and submit comments during subsequent phases of stakeholder engagement.
7.0	MEETING CLOSURE
7.1	Mr Ralph Sachika, Acting Chief Regional Officer of the //Kharas Regional Council, thanked participants and the Project Team for their contributions. Stakeholders were encouraged to remain engaged throughout the ESIA process and to submit any further comments or information relevant to the assessment. The meeting was formally closed.

Attendance Registers

(personal contact details redacted from the public version)

IlKharas Regional Council

Private Bag 2164, Kalkbani (MANNHOOP) Tel: +264 (0) 221 600 | Fax: +264 63 22 3832

Erin: Bernice Fufane

12 August 2025

ATTENDANCE REGISTER

SCOPING PHASE PUBLIC CONSULTATION FOR THE ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT OF THE PROPOSED HAIB COPPER PROJECT

DATE: **13 AUGUST 2025 - 10:00 AM**
VENUE: **IKRC EDUCATION BOARDROOM**

No	Institution	Position	Initials	Signature	Date
1	KALCH: PERSO	Civil Engineer			
2	Knight Piésold	Environment Manager			
3	Kom yor	Project Manager			
4	KORYX	C.E.O			
5	Procedural Office	Environmental			

13/08/25 10:00 AM 10:00 AM 10:00 AM 10:00 AM 10:00 AM

6	Regional	Regional	Regional	Regional	Regional
7	Regional	Regional	Regional	Regional	Regional
8	Regional	Regional	Regional	Regional	Regional
9	Regional	Regional	Regional	Regional	Regional
10	Regional	Regional	Regional	Regional	Regional
11	Regional	Regional	Regional	Regional	Regional
12	Regional	Regional	Regional	Regional	Regional
13	Regional	Regional	Regional	Regional	Regional
14	Regional	Regional	Regional	Regional	Regional
15	Regional	Regional	Regional	Regional	Regional
16	Regional	Regional	Regional	Regional	Regional
17	Regional	Regional	Regional	Regional	Regional
18	Regional	Regional	Regional	Regional	Regional
19	Regional	Regional	Regional	Regional	Regional

 **NAMIBIA**
MY COUNTRY, MY PRIDE

All official correspondence must be addressed to the Chief Regional Officer

20			NGEPESW	Community			
21			NOTES	Director			
22			NGRC	Chairperson			
23			NGRC	Member			
24			NGRC	Member			
25			NGRC	Member			
26			NGRC	Member			
27			NGRC	Member			
28			NGRC	Member			
29							
30							
31							
32							
33							

 **My NAMIBIA**
MY COUNTRY, MY PRIDE

All official correspondence must be addressed to the Chief Regional Officer

Photographic Record



APPENDIX D: IMPACT ASSESSMENT PHASE STAKEHOLDER ENGAGEMENT RECORDS

APPENDIX D.1 IMPACT ASSESSMENT PHASE POWERPOINT PRESENTATION

APPENDIX D.2 IMPACT ASSESSMENT PHASE MEETING MINUTES

- Appendix D.2.1 National Authority Stakeholder Feedback Meeting
- Appendix D.2.2 Bondelswarts Traditional Authority Feedback Meeting
- Appendix D.2.3 Open House
- Appendix D.2.4 Regional Authority Stakeholder Feedback Meeting
- Appendix D.2.5 Community Feedback Meeting
- Appendix D.2.6 Women's Focus Group Discussion
- Appendix D.2.7 Farmers, Business and Tourism Sector Focus Group Discussion
- Appendix D.2.8 Constituency Development Committee Meeting
- Appendix D.2.9 Noordoewer Community Representative Committee (NCRC) FGD

APPENDIX D.3 WATER ABSTRACTION STRATEGY – FARMERS, BUSINESS AND TOURISM SECTOR FOLLOW-UP MEETING – 12 AUGUST 2026

- Appendix D.3.1 Water Abstraction Strategy – Farmers, Business and Tourism Sector Follow-up Meeting Presentation
- Appendix D.3.2 Water Abstraction Strategy – Farmers, Business and Tourism Sector Follow-up Meeting Minutes

APPENDIX D.1 IMPACT ASSESSMENT PHASE POWERPOINT PRESENTATION

Consultation Team

Independent Consultant	Applicant / Developer	
Knight Piesold Consulting (Pty) Ltd - Joseph Mulders – EAP-Technical Expert - Heidi Bindemann-Nel – Local knowledge and consultation support - Ernst Simon – Local knowledge and relationship with stakeholders	Koryx Copper Inc. - Rob Zippies (Koryx ESG) - Lionel Coetzee (Koryx Country Manager)	Namibia Water Corporation Ltd. Jolanda Kamburona (Windhoek)

Proposed Haib Copper Project

Environmental Impact Assessment - Feedback to Stakeholders
April 2026

Knight Piesold Consulting

Agenda / Outline

Independent Consultant	Applicant / Developer	
Knight Piesold Consulting (Pty) Ltd	Koryx Copper Inc.	NamWater
1. Preamble / Purpose of Meeting	2. Introduction of Koryx	3. Introduction of NamWater
4. Recap of the Haib Copper Project		
5. Feedback on Results of EIA		
6. Way Forward / Next Steps		

Meeting Rules

- Please sign the attendance register
- Please switch off cell phones
- Presentation will be in English
- Opportunity for questions after presentation
- Introduce yourself when asking a question
- Work through the facilitator
- Questions and answers can be in English or Afrikaans
- Please allow everybody to participate and don't interrupt the speakers
- Permission to record the session to capture all responses/comments

Preamble

Phase of the Project- Why are we here?

- The Project is applying for two Environmental Clearance Certificates (ECC) through MEFT:

KORYX Koryx Copper, trading as Haib Minerals (Pty) Ltd, intends to apply for an Environmental Clearance Certificate (ECC) for the proposed development of the Haib Copper Mine on EPL 3140.

NAMWATER Namibian Water Corporation Ltd. (NamWater) intends to apply for ECC for the proposed development of water abstraction, supply and storage infrastructure required to supply the Haib Copper Mine water demand.

The Haib Copper Project

PREAMBLE

Preamble

Phase of the EIA

Phase	Purpose	Timeline
Screening	- Develop project description and Background Information Document (BID) - Application for ECC is submitted to the Competent Authority (CA) - CA to provide feedback	May to Aug 2025
Scoping (Define ToR of EIA)	- IAAP Identification, notification and registration, Baseline Studies - Public Participation, Consultations, Review and Comment on BID (2-week process) - Determine ToR for EIA Phase - IAAP Review and Commit	Aug to Nov 2025
Impact Reporting (EIA) and Environmental Management Plan (EMP)	- Assess Alternatives - Spentwater Studies - Impact Prediction, Evaluation, mitigation - Develop FEA not for - IAAP Review and Commit - Submit FCC Application	Sept – May 2026 6 May – 19 May (14 days) End May 2026
Decision Making	Authority assessment and decision made by the CA and conditions of approval	
Appeal	Environmental Assessment Practitioner (EAP) to notify registered IAAPs of decision, and of their rights to appeal to the Minister, MEFT, within 14 days	

Preamble

Phase of the Project- Why are we here?

- The Project:** Open pit copper mine and associated infrastructure
- The Plan:** Apply for ECC through MIME/MAWLR (CA) to MEFT
- Project Phase:** Pre-feasibility phase and investigations ongoing depends on economic and impact feasibility studies
- Important:** Project not a guarantee and depends on outcomes of these feasibility studies
- Consultation History:** Round 1 August 2025 now back with results.
- Session objectives:** Feedback on EIA and EMP and future sustainable development plans

Urban Dynamics Arica (Pty) Ltd.
EIA Stakeholder Engagement Report:
NamWater EIA

KORYX: BORNE FROM A PROVEN TRACK RECORD OF SUCCESS

Highly successful business who have delivered value through multiple successful mining exits

Focus on core competence (identify, acquire, advance) and repeating past success

Very capable leadership & technical team with strong Namibian roots

Recently took over management control of Koryx Copper, which is developing the large-scale Halp Copper Project in Namibia

Completed 2011
APRI GOLD
SILVER CLIP

Completed 2016
LUMINA
OSINO

Completed 2024
KORYX COPPER

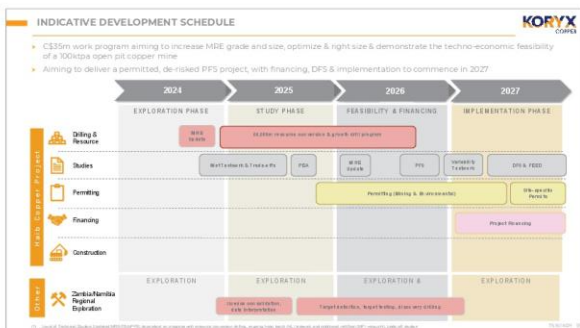
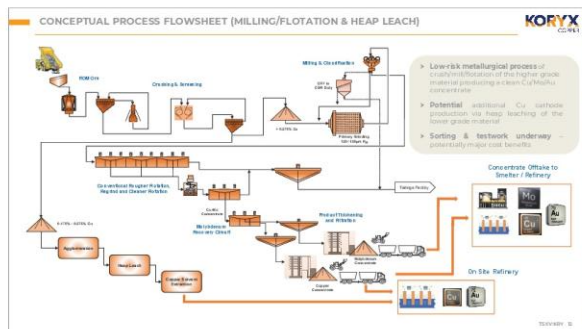
In progress ...
KORYX COPPER

Herby Daun
President & CEO
Namibian mining engineer and company builder with 25 years of mining & public markets experience
Three successful exits: OSI sold to AngloGold Ashanti for \$180m in 2012 and BTO for \$100m in 2017 and BTO merged into LUM in \$200m transaction in 2016
Previous roles in banking & fund management in South Africa. First 10 years of career with BSA Tinto, AngloGold & Goldfields, building & operating mines in Africa

Umar Cawston
Country Manager

Rob Zippels
Sustainability Manager

10/10/2024



NamWater
Namibian Water Corporation Ltd.

- Namibia Water Corporation Ltd. (NamWater)
– Namibia's national water utility and water resource management authority,
- Established to ensure a sustainable, safe, and reliable water supply for domestic, industrial, and commercial use across the country,
- NamWater is a recognised and licensed authority for the abstraction and distribution of water in Namibia, ensuring that water use is sustainable and legally compliant.

NAMWATER
Namibia Water Corporation Ltd.

10/10/2024

RESPONSIBLE MINING

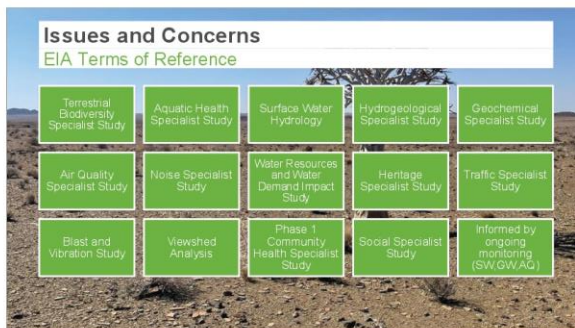
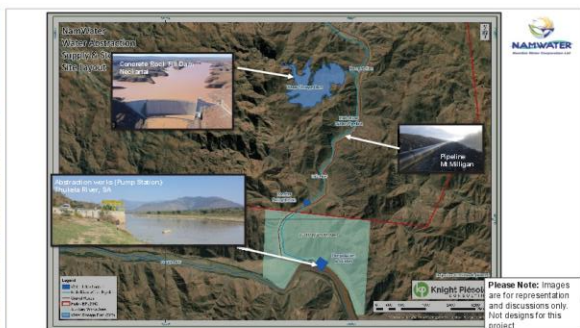
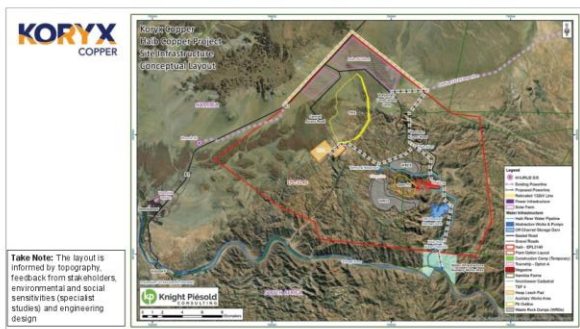
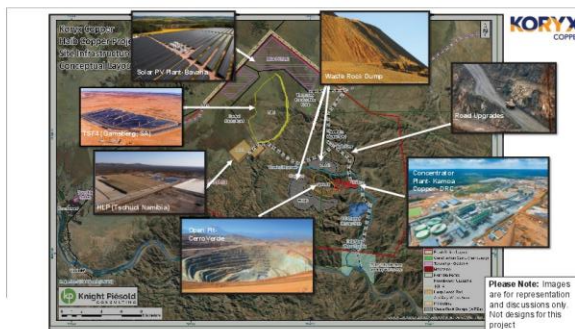
Our promise:
Be a responsible corporate citizen from the start

This means:
Working in a way that respects and supports people, the environment, and local communities, while taking minerals from the ground. It includes using safe methods, reducing harm to nature, treating workers fairly, and helping nearby communities grow in a good way.

Specific commitments

- Health and safety first:** For all workers and communities.
- Water stewardship:** Responsible water use now and in future.
- Environmental care:** Protect nature and minimise harm and resource consumption.
- Community partnerships:** Build strong and respectful relationships.
- Shared prosperity:** Generate wider economic benefits.
- Respect human rights:** Uphold and respect human dignity and fairness.
- Ethical conduct:** Operate with integrity, transparency and compliance.
- Legacy planning:** Design for positive post-mine outcomes.
- Innovate and improve:** Continuously enhance performance and sustainability.

10/10/2024



EIA Investigation Results

Positive Impacts

GDP Contribution:

- 3.6% to GDP in year 1
- 25% to the GDP contribution of mining

Government Income:

- Royalties and Levies- Ave N\$654 million/a
- Government income- Ave 2.87% /a

Export Earnings:

- Increased national export earnings by 18.5%

Job Creation

- Up to 3 500 construction, 1 350 Operation
- Majority are semi skilled and skilled

Local Economic Contributions (Chamber of Mines 2024)

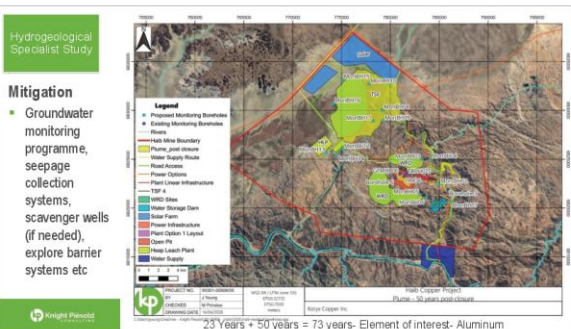
- 1 induced and 1 indirect job for every direct job (likely an underestimate)
- Income from procurement

Important Note: Early estimates based on the Preliminary Economic Assessment for the Haib Copper Project (PEA) (Korya Copper, 2025)

Knight Piesold

Issues and Concerns

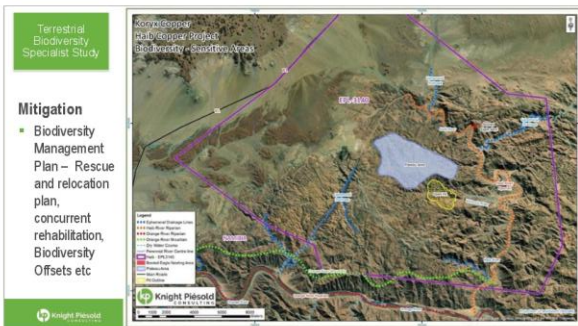
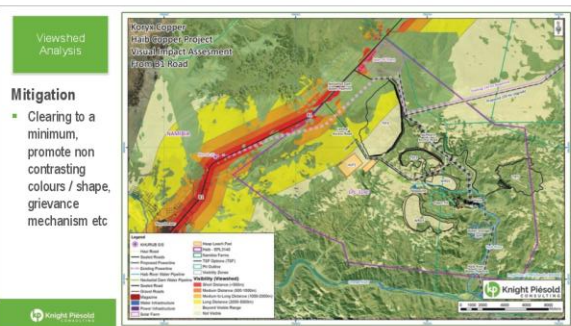
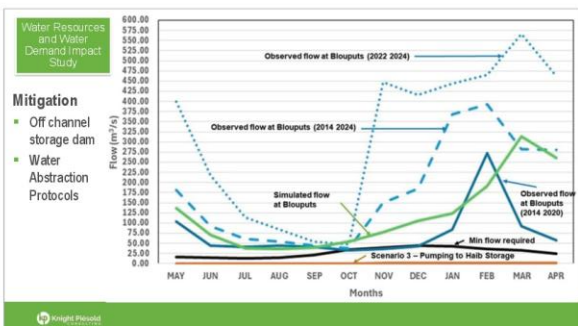
EIA Terms of Reference



EIA Investigation Results

Residual Impacts After implementing available Mitigation

Possible Impacts and Proposed Enhancement / Mitigation	
Aspect	Possible Residual Impact
Socio Economic (+)	Contribution to Namibia's GDP, national taxes and royalties, exports and trade deficit increased employment, procurement and indirect/induced economic opportunities Contribution to regional power alternative supply (sry)
Topography	The landscape will be permanently altered by large infrastructure
Hydrogeology	Not significant on regional resources - Poor quality leachate reaching on site aquifers
Surface Water	Changed local site hydrology
Hydrology	Mine pit water reduced quality
Soil	On site contamination of soil (Mine residue)
Terrestrial Biodiversity	Impact / disturbance of Fauna, Flora and sensitive habitats
Traffic	Increased traffic
Visual / Aesthetic	Infrastructure will be visible from the B1 highway
Heritage / Archaeology	Relocation of specific heritage features
Social and Community	Economic displacement
Health	Population influx- increased prevalence of social pathologies, STIs and overcrowding





Heritage Specialist Study

- 78 Features across 51 sites EPL and surrounds
- Regardless of all efforts to avoid- some features will need relocation.
- Mitigation
 - Cultural Heritage Management Plan
 - Demarcation, buffers, signage
 - NHC permitting and consent requirements,
 - Chance-Find Procedures etc.



EIA Investigation Results
Social and Community Health

Phase 1 Community Health Specialist Study | **Social Specialist Study**

Positive Impacts

- Local employment and procurement income
- Education, training skills development

Residual Impacts Identified

- Population influx
 - Social pathologies
 - Health (Overcrowding, STI related, pressure on services)
- Economic displacement
- Mine closure impacts (loss of income and livelihoods)

Enhancement / Mitigation

- Procurement and retention policies
- Prioritise local employment
- Skills development strategies
- Support local regional council/ Settlement office- Services
- Action plan for effected farmers (National legislation)
- Ongoing feedback at local SH forums
- Community Grievance mechanisms

Knight Piesold

Register and Contribute

- Please register and provide comments, issues or concerns to:
 - Heidri Nel
 - +264 81 651 7336
 - esiahaib@udanam.com
- Joseph Mulders / Lima Maartens
- +27 72 754 2603 / +264 (0)61 255750
- haibesia@knightpiesold.com

Inputs from this PPP will inform the final EIA and EMP which will be made available online at <https://www.knightpiesold.com/pa/haib/> And in hard copy at:

- Noordoewer Settlement offices,
- //Kharas Regional Council (Keetmanshoop)
- Karasburg Constituency Office

for a public review period of 14 days from the 6th to 19th May 2026.

Registered I&APs will be informed of details via email and sms.



APPENDIX D.2 IMPACT ASSESSMENT PHASE MEETING MINUTES

APPENDIX D.2.1 EIA, National Authority Stakeholder Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA – NATIONAL AUTHORITY STAKEHOLDER FEEDBACK MEETING

Date: 20 April 2026
Time: 09:00–11:30
Place: Opera House, Windhoek
Note Taker: Heidri Nel

File No.: UDA 1281
Cont. No.:

Participants:	A total of 11 participants attended the meeting, including representatives of NamPower, the Roads Authority, the Ministry of Industries, Mines and Energy (MIME), the Namibia Investment Promotion and Development Board (NIPDB), and renewable energy interests, together with members of the Project Team. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Ernst Simon (UDA) welcomed participants and thanked them for attending the meeting. The purpose of the engagement was explained, and participants were encouraged to raise questions, concerns and recommendations.
1.2	The meeting formed part of a combined engagement programme during which information relating to the proposed Haib Copper Project and the associated water infrastructure was presented. These minutes focus on matters relevant to the Haib Copper Project mining ESIA, while recognising that some discussion also related to the associated water infrastructure and its separate environmental assessment process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which the stakeholder representatives introduced themselves. Participants were requested to complete the attendance register.
3.0	PURPOSE AND OBJECTIVES OF THE MEETING

1 of 6

Item No.	Description
3.1	Ernst Simon (UDA) explained that the purpose of the meeting was to provide stakeholders with an update on the proposed Haib Copper Project and to present the findings of the environmental assessment work undertaken to date.
3.2	The objectives were to present the environmental and social assessment findings; discuss identified impacts and proposed mitigation and management measures; and provide stakeholders with an opportunity to raise questions, comments and recommendations for consideration in the ESIA process.
4.0	PRESENTATIONS
4.1	Joseph Mülders (KP) presented the findings of the environmental assessment process and provided input on the ESIA and associated technical matters.
4.2	Robert Zipplies and Lionel Coetzee (KC) provided Project-related information and responded to questions concerning the proposed mining development, operations, logistics, transport and processing.
4.3	Information relating to the associated water abstraction, supply and storage infrastructure was also presented during the combined meeting programme. Matters specific to that infrastructure are addressed through its separate environmental assessment process.
5.0	DISCUSSION
5.1	Infrastructure Capacity and Potential Population Influx
	Participants raised concern regarding the potential influx of approximately 1,000–1,500 workers and associated indirect population growth. Questions were raised regarding whether existing electricity, water, sewerage and road infrastructure would be able to accommodate additional Project-related demand.
	Ernst Simon (UDA) explained that the required services and associated impacts are being assessed as part of the ESIA process and that existing infrastructure would require upgrading. Options under consideration include on-site workforce accommodation and supporting development in Noordoewer in coordination with the relevant local authorities.
5.2	Renewable Energy and Collaboration Opportunities
	Participants proposed the integration of renewable energy solutions, including solar energy and green hydrogen, and raised the possibility of collaboration on future energy requirements and transport solutions.
	Joseph Mülders (KP) noted the proposed energy solutions and potential collaboration opportunities. The Project Team indicated that relevant opportunities may be considered as Project planning and feasibility work progress.
5.3	Transport Routes and Export Logistics
	Participants sought clarification regarding the proposed logistics chain and how product would be transported from the mine site to export facilities.
	Joseph Mülders (KP) explained that transport options under assessment include road transport to Grünau followed by rail transport to the harbour, as well as direct road transport. The final transport arrangement will depend on the outcomes of the ongoing feasibility assessments.
5.4	Transport Volumes, Heavy Vehicle Loading and Axle Load Compliance

Item No.	Description
	Participants sought clarification regarding anticipated transport volumes and the distinction between the total volume of material mined and the volume of product to be transported from the site.
	The Project Team explained that, although total mined volumes would be substantial, the transported product volume would be significantly lower, at approximately 400,000 tonnes per annum. This volume is being used to inform transport planning and impact assessment.
	Questions were also raised regarding the management of heavy vehicle loading, overloading risks and compliance with legal axle load limits. Participants specifically asked whether a weighbridge would be provided at the site before trucks enter public roads.
	Ernst Simon (UDA) explained that transport impacts, including the use of public roads and routes to the harbour, are being assessed through the Traffic Impact Assessment. Compliance measures, including the possible use of weighbridges, will be considered during detailed design and operational planning.
	Robert Zipplies (KC) further explained that truck-loading controls and compliance measures, including axle load management, will be implemented during the operational phase through Project procedures and management plans.
5.5	Cumulative Traffic and Road Safety Impacts
	Participants raised concerns regarding existing heavy vehicle traffic, including manganese haulage, and the potential cumulative impacts of additional Project-related traffic on the route to Lüderitz. Particular concern was expressed regarding road safety, and potential control measures were suggested.
	Ernst Simon (UDA) explained that traffic-related impacts are being assessed through the Traffic Impact Assessment, including baseline traffic conditions and cumulative impacts. Traffic management and road safety measures, including the measures suggested during the meeting, will be considered as part of the Traffic Management Plan.
5.6	Alternative and Green Transport Solutions
	Participants suggested that alternative logistics solutions be considered, including water transport and the use of green energy, such as hydrogen, for trucks, rail and vessels. Opportunities for collaboration were also proposed.
	Robert Zipplies (KC) explained that river transport is not considered viable because of shallow and non-navigable conditions. Alternative logistics options remain under assessment, and collaboration opportunities may be considered where feasible.
5.7	Water Supply and Transboundary Considerations
	Participants sought clarification regarding whether the proposed abstraction of water from the Orange River had been coordinated with South African authorities. Questions were also raised regarding the potential implications of the proposed Noordoewer Dam for the Project's future water supply, storage and security.
	Joseph Mülders (KP) explained that water abstraction studies had been undertaken in accordance with South African requirements and that the Project would proceed through the applicable Namibian regulatory processes, which would address transboundary considerations.
	Joseph Mülders (KP) further explained that various water supply scenarios had been assessed, including the proposed Noordoewer Dam. While the dam could potentially improve water supply

Item No.	Description
	reliability, uncertainty remains regarding its development and timing, and the Project therefore cannot depend on it.
	These matters were discussed as part of the combined meeting programme because of the mine's future water requirements. Detailed matters specific to the associated water abstraction, supply and storage infrastructure are addressed through its separate environmental assessment process.
5.8	Port Capacity and Export Planning
	Participants raised concern regarding potential congestion at the Port of Lüderitz and suggested collaboration to support future harbour expansion.
	The Project Team acknowledged the potential port capacity constraints and explained that these would be considered in logistics and export planning as part of the ongoing feasibility assessments.
5.9	Downstream Processing and Local Value Addition
	Participants asked whether downstream processing, including the development of a smelter, had been considered as part of the proposed Project.
	Lionel Coetzee (KC) explained that a smelter does not form part of the current Project scope. Multiple projects would be required to make a smelter sustainable, and it is therefore not considered viable at this stage.
5.10	Key Matters Raised
	The discussion highlighted strong stakeholder interest in the broader infrastructure and logistical implications of the proposed mining development. Key matters included infrastructure capacity, population influx, transport routes and volumes, axle load compliance, cumulative traffic and road safety impacts, renewable energy opportunities, water supply, port capacity and downstream processing.
	The Project Team confirmed that the matters raised would form part of the formal stakeholder engagement record and would be considered in the ongoing assessment, feasibility and Project planning processes where relevant to the proposed mining development.
6.0	FOLLOW-UP MATTERS
6.1	Infrastructure and service requirements associated with the proposed Project will continue to be considered through the ESIA and Project planning processes.
6.2	Alternative logistics and renewable energy collaboration opportunities may be considered as feasibility and Project planning progress.
6.3	The issues and concerns raised during the meeting will be retained as part of the formal stakeholder engagement record and considered in the ESIA process where relevant to the proposed mining development.
7.0	MEETING CLOSURE
7.1	Ernst Simon (UDA) thanked participants for their attendance and contributions. Participants were encouraged to remain engaged as the Haib Copper Project ESIA progressed and to participate in future opportunities for review and comment. The meeting was formally closed.



Attendance Registers

(personal contact details redacted from the public version)

URBAN DYNAMICS
urban dynamics

KORYX
COPPER

Knight Piésold
CONSULTING

ATTENDANCE REGISTER

DATE:	20/04/26	TIME:	09:00 - 12:00
PURPOSE OF MEETING:	ESIA for Haib Copper Mine Project - Noordoewer - Authority Meeting	VENUE:	Opera House, Windhoek

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Vivo Energy	Mining Manager			
		Amurha Solas	Manager			
		KP	ENGINEER			
		NWT	DEPUTY DIRECTOR			
		Haib Minerals	Senior Accountant			
		Haib Minerals	Accountant			

URBAN DYNAMICS
urban dynamics

KORYX
COPPER

Knight Piésold
CONSULTING

ATTENDANCE REGISTER

DATE:	20/04/26	TIME:	09:00 - 12:00
PURPOSE OF MEETING:	ESIA for Haib Copper Mine Project - Noordoewer - Authority Meeting	VENUE:	Opera House, Windhoek

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		KiF	Chairperson			
		MNT	Director			
		Rena Artur	Manager			
		NAMWATER	Senior Engineer			
		Koryx	Director			

5 of 6

20 April 2026

135 of 222

1281-NamWater EIA SER
1 September 2026

Photographic Record



APPENDIX D.2.1 EIA, Bondelswarts Traditional Authority Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA – BONDELSWARTS TRADITIONAL AUTHORITY FEEDBACK MEETING

Date: 21 April 2026 **File No.:** UDA 1281
Time: 10:00–13:00 **Cont. No.:**
Place: Karasburg West Constituency Office
Note Taker: Heidri Nel

Participants:	Four representatives of the Bondelswarts Traditional Authority and one representative of the Nama Traditional Leaders Association attended the meeting, together with representatives of the Karasburg East Constituency, Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Ernst Simon (UDA) welcomed participants and thanked them for attending the meeting. The purpose of the engagement was explained, and participants were encouraged to raise questions, concerns and recommendations.
1.2	The meeting formed part of a combined engagement programme during which information relating to the proposed Haib Copper Project and the associated water infrastructure was presented. These minutes focus on matters relevant to the Haib Copper Project mining ESIA, while recognising that some discussion also related to the associated water infrastructure and its separate environmental assessment process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which the stakeholder representatives introduced themselves. Participants were requested to complete the attendance register.
3.0	PURPOSE AND OBJECTIVES OF THE MEETING

1 of 6

Item No.	Description
3.1	Ernst Simon (UDA) explained that the purpose of the meeting was to provide feedback on the environmental assessment work undertaken for the proposed Haib Copper Project and to provide stakeholders with an opportunity to raise comments, concerns and recommendations.
3.2	The objectives were to provide an update on the proposed Project and ESIA process; present the environmental and social assessment findings available at the time; discuss identified impacts and proposed mitigation and management measures; and obtain further stakeholder feedback for consideration in the ESIA process.
4.0	PRESENTATIONS
4.1	Joseph Mülders (KP) presented the environmental assessment findings and provided input on the ESIA and associated technical matters.
4.2	Robert Zipplies and Lionel Coetzee (KC) provided Project-related information and responded to questions concerning the proposed mining development, employment, recruitment, community participation and potential Project benefits.
4.3	Information relating to the associated water infrastructure was also presented during the combined meeting programme. Matters specific to that infrastructure are addressed through its separate environmental assessment process.
5.0	DISCUSSION
5.1	Access to Environmental Assessment Information:
	Participants asked whether stakeholders would be able to access the studies and assessment work undertaken, including information on identified impacts and proposed mitigation measures. Questions were also raised regarding access to environmental assessment reports and the availability of hard and electronic copies.
	Ernst Simon (UDA) explained the arrangements for stakeholder access to environmental assessment information and opportunities for review and comment. The specific report review period discussed during the meeting related to the associated water infrastructure assessment. The public review arrangements for the Draft Haib Copper Project ESIA Report will be communicated separately.
	Participants also requested that Project documentation be made accessible in Karasburg, rather than only in Noordoewer. The importance of providing accessible local information was acknowledged.
5.2	Land Status, Historical Associations and Cultural Heritage:
	Participants sought clarification regarding the extent of State and private land within the mining licence area, whether existing land users could be affected and whether relocation or resettlement could occur. The discussion also addressed access to land and natural resources, historical occupation, graves and other evidence of prior Nama occupation.
	Joseph Mülders (KP) explained that the majority of the Project area is State land, with limited private land portions, and that no physical resettlement had been identified at the time of the meeting. Robert Zipplies (KC) clarified that the mining licence provides operational rights and does not confer ownership of the land.
	Participants emphasised the historical association of the Bondelswarts community with the wider area and raised broader questions concerning Traditional Authority

Item No.	Description
	jurisdiction and recognition of historical land use. The Project Team acknowledged the concerns raised. It was explained that broader land and jurisdiction matters fall under State authority and extend beyond the mandate of the Project proponent and the ESIA process.
5.3	Access to Natural Resources, Grazing and Traditional Practices:
	Participants raised concern that development could restrict access to land, natural resources and traditional practices. The discussion included grazing land, livestock movement and wider pressures affecting access to grazing areas and resources.
	Robert Zipplies (KC) acknowledged the importance of access to land and natural resources as a stakeholder concern. The Project Team noted that Project-related impacts on access and land use would be considered through the ESIA where relevant.
	Some of the discussion also related to the associated water infrastructure. Matters specific to the location, land requirements and impacts of that infrastructure are addressed through its separate environmental assessment process.
5.4	Waste Management and Environmental Health:
	Participants referred to experiences associated with other mining operations and raised concerns regarding waste management and the potential for environmental and health impacts on surrounding communities.
	Robert Zipplies (KC) acknowledged the concerns raised and explained that waste management and potential environmental and health impacts form part of the environmental assessment and management process.
5.5	Community Participation, Traditional Authority Engagement and Project Benefits
	Participants questioned whether consultation and information sharing provided communities with sufficient opportunity to influence Project decisions and suggested that stronger forms of participation should be considered
	Robert Zipplies (KC) explained that the Project is following the applicable regulatory process and that the stakeholder engagement being undertaken extends beyond the minimum engagement requirements. Stakeholder concerns and recommendations are being formally recorded and considered through the ESIA process.
	Broader questions regarding formal participation rights and alternative participation mechanisms extend beyond what the Project can determine through the ESIA process and would need to be addressed within the applicable national policy, legal and institutional framework.
5.6	Traditional Authority Engagement:
	Traditional Authority representatives expressed concern that they had not been involved from the beginning of the Project and sought clarification regarding their future role.
	The Project Team explained that the applicable engagement process is being followed and that the Bondelswarts Traditional Authority is being engaged as a relevant stakeholder as part of the ESIA process. Continued engagement with the Traditional Authority and other relevant stakeholders will form part of the Project's ongoing stakeholder engagement and community relations activities as the Project progresses

Item No.	Description
5.7	Project Benefits and Benefit Sharing:
	Participants raised concerns regarding benefit sharing and questioned whether communities would receive direct and enforceable benefits from the proposed mining development.
	Robert Zipplies (KC) acknowledged the concerns raised and explained that formal benefit-sharing mechanisms are governed by the national legal and institutional framework. The Project cannot establish or determine national benefit-sharing requirements through the ESIA process. Questions concerning broader formal benefit-sharing arrangements would therefore need to be addressed at the appropriate government and policy level.
5.8	Definition of “Local” and Regional Inclusion:
	Considerable discussion focused on the meaning of “local” in relation to employment opportunities and Project benefits. Participants questioned whether the term would apply only to Noordoewer or whether Karasburg East and communities within the wider Traditional Authority and regional area would also be included.
	Participants expressed concern that a narrow definition of “local” could exclude surrounding communities from employment and economic opportunities and result in Project benefits becoming concentrated in Noordoewer. The importance of considering the wider regional context was emphasised.
	Ernst Simon (UDA), Lionel Coetzee (KC) and other members of the Project Team acknowledged that the definition of “local” required further clarification and would need to be considered through continued engagement and Project planning.
5.9	Employment and Recruitment:
	Participants sought clarification regarding recruitment processes and how individuals could submit CVs or access future employment opportunities associated with the Project.
	Lionel Coetzee (KC) explained that recruitment would follow structured processes and that Koryx Copper does not accept ad hoc CV submissions. The arrangements available at the time for submitting CVs in relation to specific opportunities were explained.
	Participants raised concern that recruitment arrangements centred on Noordoewer could disadvantage people from Karasburg East and surrounding communities who may have to travel to access employment opportunities. This concern was linked to the broader discussion regarding how “local” would be defined for the Project.
	Concerns were also raised that contractors could bring external workers to the Project, potentially reducing employment opportunities for people from the surrounding communities and wider region.
	Robert Zipplies (KC) acknowledged the concerns regarding accessibility and local participation. He explained that contractor recruitment would be guided by Project requirements and that local participation would be strongly promoted and enforced.
	Participants further questioned whether workers initially employed by contractors could later be retained by the Project, potentially limiting opportunities for other local applicants. Robert Zipplies (KC) explained that this could occur depending on Project needs and individual performance requirements, but was expected to be limited.



Item No.	Description
5.10	Key Matters Raised:
	At the conclusion of the discussion, participants reiterated key concerns relating to waste management, local inclusion, employment and Project benefits, community participation, land and natural resource access, and recognition of historical and cultural matters.
	The Project Team confirmed that the matters raised would form part of the formal stakeholder engagement record and would be considered in the ongoing assessment and reporting process where relevant to the proposed mining development
6.0	FOLLOW-UP MATTERS
6.1	Stakeholders will be informed of the public review period and access arrangements for the Draft Haib Copper Project ESIA Report.
6.2	The need to make Project information accessible to stakeholders in Karasburg was noted.
6.3	Concerns relating to the definition of "local", access to employment opportunities, recruitment and the regional distribution of Project benefits will remain matters for continued engagement and Project planning.
6.4	Engagement with the Bondelswarts Traditional Authority, constituency structures and other relevant stakeholders will continue as the ESIA and Project planning progress.
6.5	The issues and concerns raised during the meeting will be retained as part of the formal stakeholder engagement record and considered in the ESIA process where relevant to the proposed mining development.
7.0	MEETING CLOSURE
7.1	Ernst Simon (UDA) thanked participants for their attendance and contributions. Participants were encouraged to remain engaged as the Haib Copper Project ESIA progressed and to participate in future opportunities for review and comment. The meeting was formally closed.

APPENDIX D.2.3 EIA, Open House Recoding



OPEN HOUSE RECORD

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA – OPEN HOUSE FEEDBACK SECTION

Date: 22 April 2026 **File No.:** UDA 1281
Time: 08:00–13:00 **Cont. No.:**
Place: EHW Baard Primary School, Noordoewer
Note Taker:

Participants:	Seven members of the public attended the session.
Regrets:	None
Distribution:	Mr Ernst Simon (UDA) and Mr Joseph Mülders (KP)

Attendance Registers

(personal contact details redacted from the public version)



DATE:	22/04/26	TIME:	09:00 - 13:00	ATTENDANCE REGISTER		
PURPOSE OF MEETING:	ESIA for Haib Copper Mine Project - Noordoewer – Open House	VENUE:	Baard Primary School, Noordoewer			
Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Private		c		
		Private		e		
		Community Education Centre	Abel Jacobsen	c	e	
		Teacher	Head Teacher	c	i	
		Unemployed		0	n	
		Unemployed		0	n	
		Unemployed		08	b	

Photographic Record



APPENDIX D.2.4 EIA, Regional Council Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT Environmental and Social Impact Assessment (ESIA)

EIA – REGIONAL COUNCIL FEEDBACK MEETING

Date: 22 April 2026 **File No.:** UDA 1281
Time: 14:30–16:30 **Cont. No.:**
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

Participants:	Fourteen stakeholder representatives attended the meeting, comprising representatives of the //Kharas Regional Council, government ministries, local authorities and the education sector, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details and stakeholder names have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	The Project Team welcomed participants and thanked them for attending the meeting. Participants were encouraged to raise questions, concerns and recommendations regarding the proposed Haib Copper Project and the ESIA process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which stakeholders introduced themselves and indicated the institutions and organisations they represented.
3.0	PURPOSE AND OBJECTIVES OF THE MEETING
3.1	The meeting formed part of the stakeholder engagement process for the proposed Haib Copper Project ESIA.
3.2	The purpose of the meeting was to provide feedback on the Project and the environmental and social assessment work undertaken to date and to provide stakeholders with an opportunity to raise further questions, concerns and recommendations.

4.0	PRESENTATIONS
4.1	The Project Team presented information on the proposed Haib Copper Project and the environmental and social matters under assessment.
5.0	DISCUSSION
5.1	Bulk Water Supply and the Role of NamWater
	A local authority representative sought clarification on why NamWater did not make a separate presentation and how the bulk water supply component is addressed within the Project.
	Joseph Mülders (KP) explained that the bulk water supply forms part of the overall Project and was therefore included in the presentation. It was further explained that abstraction from the Orange River would be implemented by NamWater and would be subject to a separate EIA process.
5.2	Water Abstraction and Wastewater Management
	A representative of the Ministry of Health and Social Services sought clarification on the proposed water abstraction and the management of wastewater generated by the Project.
	Joseph Mülders (KP) explained that water abstraction would be undertaken in a controlled manner. Wastewater would be reused within the system, with no discharge anticipated and water losses primarily limited to evaporation.
5.3	Operational and Post-closure Land Use
	A representative of the Ministry of Agriculture, Water and Land Reform raised concern regarding land use during Project operations and following mine closure, including the potential utilisation of the area by livestock.
	Joseph Mülders (KP) and Ernst Simon (UDA) explained that the area is not widely utilised due to terrain constraints. Closure planning is ongoing, and rehabilitation measures would be implemented where feasible. Potential future land uses following mine closure would be determined through the closure planning process.
5.4	Site Boundary Control and Livestock Exclusion
	A representative of the Ministry of Agriculture, Water and Land Reform sought clarification on how the Project site would be controlled and how livestock would be excluded from operational areas.
	Lionel Coetzee (KC) explained that the site would be demarcated and controlled. Fencing and access control measures would be implemented in accordance with the applicable requirements of the Mining Act.
5.5	Electricity Supply and Project Demand
	A representative of the Ministry of Agriculture, Water and Land Reform sought clarification on the proposed electricity supply and whether adequate electricity would be available for the Project.
	Lionel Coetzee (KC) explained that the Project would rely on electricity supplied through NamPower, with supplementary solar options and future energy developments also being considered.
	A local authority representative further sought clarification on the distribution of electricity demand and the implications of increased demand in southern Namibia.
	Lionel Coetzee (KC) and Ernst Simon (UDA) explained that electricity demand is currently concentrated in northern Namibia and that increased demand in the south could improve the balance of the national transmission system.

5.6	Local Procurement, Training and Skills Development
	A representative of the Ministry of Health and Social Services sought clarification on local procurement, training and skills development opportunities associated with the Project.
	Robert Zipplies (KC) explained that local content and training initiatives are being considered, although these remain at an early stage of development.
5.7	Local Employment and External Labour
	A local authority representative raised concern regarding the allocation of employment opportunities to non-local workers and sought clarification on the availability of skilled labour within the area.
	Robert Zipplies (KC) explained that local employment would be prioritised where feasible, although detailed employment arrangements have not yet been finalised. Specialised skills may initially need to be sourced externally, while training would be considered to support greater local participation over time.
5.8	Community Expectations Regarding Employment
	A local authority representative raised concern regarding community expectations and potential pressure associated with employment opportunities.
	Robert Zipplies (KC) acknowledged the concern and explained that employment arrangements have not yet been finalised, as the Project remains at the feasibility stage.
5.9	Water Abstraction During Low-flow Conditions
	A local authority representative raised concern regarding water abstraction from the Orange River during low-flow conditions and the potential implications for downstream water requirements.
	Joseph Mülders (KP) explained that abstraction would be controlled through defined threshold levels linked to downstream requirements. Abstraction would be reduced or stopped during periods of low flow.
5.10	Access to the Draft ESIA Report and Review Period
	A representative of the //Kharas Regional Council raised concern regarding the time available to review the ESIA documentation and the accessibility of Project information.
	Ernst Simon (UDA) confirmed that the public review period would run from 6 to 19 May 2026. Documentation would be available electronically and in hard copy at designated public access points.
	The representative further requested that physical copies of the ESIA documentation be made available to improve stakeholder access.
	Ernst Simon (UDA) confirmed that hard copies would be made available at the //Kharas Regional Council Office in Keetmanshoop, the Karasburg East Constituency Office in Karasburg, and the relevant Noordoewer settlement/constituency office.
5.11	Alignment with Regional Planning Frameworks
	A representative of the //Kharas Regional Council emphasised the importance of aligning the Project with regional planning frameworks and collaborating on planning initiatives, including the Noordoewer Spatial Development Framework.
	Ernst Simon (UDA) and Robert Zipplies (KC) indicated that the Project intends to align with relevant regional planning frameworks and would engage with the //Kharas Regional Council to support coordinated planning.
5.12	Structured Community Engagement Platforms

	A local authority representative suggested that structured platforms should be established to support continued community engagement.
	Ernst Simon (UDA) noted the suggestion and indicated that it would be considered going forward.
5.13	Factors Supporting Project Progression
	A representative of the //Kharas Regional Council sought clarification on the factors that have enabled the Project to progress at this stage.
	Lionel Coetzee (KC) explained that increased copper demand and improvements in mineral processing, including refinement of the process flow diagram, have improved the feasibility of the Project.
5.14	Local Content Benefits for Noordoewer
	An education sector representative sought clarification on how Noordoewer and surrounding communities would benefit from local content opportunities.
	Robert Zipplies (KCr) explained that local content policies are being developed to support employment and procurement opportunities.
5.15	Access to Project Information and Communication Methods
	Stakeholders raised concern regarding access to Project information, the effectiveness of communication methods and the ability of stakeholders to understand the information being provided.
	Ernst Simon (UDA) explained that communication channels include email, messaging platforms and physical document access points. It was acknowledged that these methods could be strengthened to improve accessibility and stakeholder understanding.
5.16	Transport Routes and Export Logistics
	A representative of the //Kharas Regional Council sought clarification on the proposed transport routes and export logistics, including the possible use of the C14 corridor.
	Joseph Mülders (KP) explained that transport routes and associated logistics impacts would be assessed as part of the ESIA.
5.17	Environmental, Air Quality and Health Impacts
	A representative of the //Kharas Regional Council raised concern regarding potential environmental impacts, including dust and pollution, and referred to impacts associated with smelter operations. Concern was also raised regarding potential health effects associated with air quality and pollution.
	Joseph Mülders (KP) explained that environmental and health impacts are being assessed through specialist studies and in accordance with regulatory requirements. Appropriate mitigation measures would be developed based on the assessment findings.
5.18	Inclusion of Affected Stakeholders
	A representative of the //Kharas Regional Council raised concern regarding whether affected stakeholders are being adequately included in the engagement process.
	Ernst Simon (UDA) explained that targeted engagement sessions are being conducted with affected stakeholders as part of the ESIA process.
5.19	Population Influx and Pressure on Services
	A representative of the //Kharas Regional Council raised concern that the Project could result in population influx and place additional pressure on housing, health services and infrastructure.

	Ernst Simon (UDA) explained that an influx impact mitigation plan would be developed and integrated into relevant spatial planning processes.
5.20	Corporate Social Responsibility and Community Support
	A representative of the //Kharas Regional Council sought clarification on corporate social responsibility initiatives and community support programmes associated with the Project.
	Robert Zipplies (KC) explained that the Haib Foundation had recently been established to manage Koryx Copper's corporate social investment initiatives as part of its broader corporate social responsibility programme. The Foundation would focus on education, early childhood development and other community support initiatives.
5.21	Language Accessibility
	An education sector representative raised concern regarding language accessibility during stakeholder engagements.
	Ernst Simon (UDA) acknowledged the need to improve language accessibility and indicated that this would be considered during future engagements.
5.22	Notification of Stakeholder Meetings
	An education sector representative sought clarification on the most effective methods for notifying stakeholders of engagement meetings.
	Ernst Simon (UDA) explained that communication channels include WhatsApp, social media, radio notices in Noordoewer and newspaper notices, although the effectiveness of these methods varies.
5.23	Support for Responsible Project Implementation
	A local authority representative expressed support for the proposed Project while acknowledging that impacts may occur and encouraged responsible Project implementation.
	Ernst Simon (UDA) acknowledged the comment and noted the importance of continued stakeholder engagement and responsible Project implementation.
6.0 FOLLOW-UP MATTERS	
6.1	The draft ESIA documentation will be made available for stakeholder review from 6 to 19 May 2026 in electronic and hard-copy formats.
6.2	Hard copies of the ESIA documentation will be made available at designated public access points within the //Kharas Region.
6.3	The Project Team will continue engagement with the //Kharas Regional Council to support alignment with regional planning frameworks and coordinated planning processes.
6.4	The suggestion to establish structured community engagement platforms will be considered as the Project progresses.
6.5	Communication methods and language accessibility will be considered further to improve stakeholder access to and understanding of Project information.
6.6	An influx impact mitigation plan will be developed and integrated into relevant spatial planning processes.
7.0 MEETING CLOSURE	
7.1	Ernst Simon (UDA) thanked participants for their attendance and contributions. Participants were encouraged to remain engaged as the Haib Copper Project ESIA progressed and to participate in future opportunities for review and comment. The meeting was formally closed.

Attendance Registers

(personal contact details redacted from the public version)

DATE:	22/04/26	TIME:	14:30 - 16:30
PURPOSE OF MEETING:	ESIA for Halib Copper Mine Project - //Kharas Regional Council	VENUE:	Noordoewer Guesthouse Noordoewer

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		EDUCATION	Inspector			
		EDUCATION	C:EO			
		COUNCIL	Kharasburg			
		Kharasburg	MANAGEMENT			
		Kharasburg	MEMBER			
		//KRC-HQ	Planning:CDP			
		NamRA	Principal officer			
		MOHSS	Senior EHP			
		//KRC-HQ	Planner			
		//KRC	CAO			
		//KRC	ACRO			
		//KRC - Gender	DB			

DATE:	22/04/26	TIME:	14:30 - 16:30
PURPOSE OF MEETING:	ESIA for Halib Copper Mine Project - //Kharas Regional Council	VENUE:	Noordoewer Guesthouse, Noordoewer

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		MOHSS	C:EO			
		NAMWATER	SCHEME Sup			
		NAMWATER	DEVELOPMENT PLANNER			
		NAMWATER	Chief Dev Planner			

Photographic Record



APPENDIX D.2.5 EIA; Community Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT Environmental and Social Impact Assessment (ESIA)

EIA – COMMUNITY FEEDBACK MEETING

Date: 22 April 2026 **File No.:** UDA 1281
Time: 17:00–19:30 **Cont. No.:**
Place: E.H.W. Baard Primary School, Noordoewer
Note Taker: Heidri Nel

Participants:	Fourteen stakeholder representatives attended the meeting, comprising representatives of the //Kharas Regional Council, government ministries, local authorities and the education sector, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details and stakeholder names have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Ernst Simon (UDA) opened the meeting, welcomed participants and thanked them for attending. He briefly explained the purpose of the engagement and encouraged participants to raise questions, concerns and recommendations regarding the proposed Haib Copper Project and the ESIA process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which stakeholders introduced themselves. Participants were requested to complete the attendance register.
3.0	PURPOSE AND OBJECTIVES OF THE MEETING
3.1	Ernst Simon (UDA) explained that the meeting formed part of the stakeholder engagement process for the proposed Haib Copper Project ESIA.
3.2	The purpose of the meeting was to provide feedback on the proposed Project and the environmental and social assessment work undertaken to date, and to provide stakeholders with an opportunity to raise further questions, concerns and recommendations.
3.3	The objectives were to provide an update on the proposed Project and ESIA process; present the environmental and social assessment findings available at the time; discuss identified

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Item No.	Description
	impacts and proposed mitigation and management measures; and obtain further stakeholder feedback for consideration in the ESIA process.
4.0	PRESENTATIONS
4.1	Joseph Mulders (KP) presented the environmental assessment findings and provided input on the ESIA and associated technical matters.
4.2	Robert Zipplies (KC) provided Project-related information and responded to questions concerning corporate social investment and community support initiatives.
4.3	Ernst Simon (UDA) provided information on the stakeholder engagement process, access to the draft ESIA Report, the public review period and opportunities for stakeholders to submit comments.
5.0	DISCUSSION
5.1	Project Scope and Purpose of the ESIA Process
	A community representative indicated that the scope of the proposed Project was not fully understood and requested clarification on the activities being proposed and the purpose of the ESIA process.
	Ernst Simon (UDA) explained that the draft ESIA Report had been completed and would be made available for public review from 6 to 19 May 2026. Hard copies would be available at designated local offices, while electronic versions would be shared through email and SMS links. Stakeholders were encouraged to review the report and submit comments during the public review period.
5.2	Corporate Social Investment and Community Support
	A community representative raised concern regarding the limited visibility of corporate social responsibility initiatives, particularly in relation to education support, youth development and community infrastructure.
	Robert Zipplies (KC) explained that the Project remains at an early stage and is not yet fully funded; therefore, large-scale corporate social investment initiatives are currently limited. Existing efforts are focused on education, including early childhood development, school support programmes and a planned community centre. These initiatives are expected to expand as the Project progresses.
5.3	Potential Pollution and Community Health Impacts
	A community representative raised concern regarding potential health impacts associated with pollution, including respiratory conditions, eye irritation and broader environmental health risks. Reference was made to pollution experienced at the Tsumeb copper smelter.
	Joseph Mulders (KP) explained that the impacts experienced at Tsumeb are associated with copper smelting activities. The proposed Haib Copper Project does not include a smelter and, therefore, similar pollution impacts are not anticipated. Potential air quality and health impacts have nevertheless been assessed as part of the ESIA, and mitigation measures have been proposed.
5.4	Accessibility of the Draft ESIA Report
	A community representative raised concern regarding access to the ESIA documentation, particularly for stakeholders who do not have access to digital platforms.

Item No.	Description
	Ernst Simon (UDA) confirmed that hard copies of the draft ESIA Report would be made available at the //Kharas Regional Council Office in Keetmanshoop, the Karasburg East Constituency Office, and the relevant Noordoewer Settlement/Karasburg West Constituency Office for public access. A summary flyer was also made available at the meeting venue.
5.5	Language Accessibility During Stakeholder Engagement
	A community representative sought clarification on whether stakeholders had been consulted regarding the language of the meeting and whether alternative languages, including Afrikaans, could be used to improve understanding.
	Ernst Simon (UDA) confirmed that stakeholders had been asked at the start of the meeting whether they preferred English or Afrikaans and were informed that questions could be raised in Afrikaans. Stakeholders indicated that they understood the proceedings. Language accessibility would continue to be considered during future engagements.
5.6	Communication and Notification Methods
	A member of the Project Team asked stakeholders how they had received information about the proposed Project and the meeting, and which communication channels they considered most effective.
	Stakeholders indicated that WhatsApp groups, social media and radio, including NBC, were the most effective communication channels, while newspapers were considered less effective. Ernst Simon (UDA) noted the feedback for consideration in improving future stakeholder engagement and notification approaches.
5.7	Key Matters Raised
	The discussion highlighted the need for clear information on the Project scope and ESIA process, accessible ESIA documentation, visible community support initiatives, appropriate management of potential air quality and health impacts, improved language accessibility and effective stakeholder communication methods.
	The Project Team confirmed that the matters raised would form part of the formal stakeholder engagement record and would be considered in the ongoing ESIA and stakeholder engagement process, where relevant.
6.0	FOLLOW-UP MATTERS
6.1	The draft ESIA Report will be made available for public review from 6 to 19 May 2026 in electronic and hard-copy formats.
6.2	Hard copies of the draft ESIA Report will be placed at designated public access points to accommodate stakeholders who do not have access to digital platforms.
6.3	Stakeholders will be encouraged to review the draft ESIA Report and submit comments during the public review period.
6.4	Language accessibility will continue to be considered during future stakeholder engagement activities.
6.5	Stakeholder feedback regarding the effectiveness of WhatsApp, social media and radio will be considered when planning future meeting notifications and communication activities.



7.0	MEETING CLOSURE
7.1	Ernst Simon (UDA) thanked participants for their attendance and contributions. Participants were encouraged to review the draft ESIA Report during the public review period and to remain engaged as the Haib Copper Project ESIA progressed. The meeting was formally closed.

Attendance Registers

(personal contact details redacted from the public version)

DATE:22/04/26

TIME:17:30- 19:30

PURPOSE OF MEETING:ESIA for Haib Copper Mine Project - Noordsewer Community Meeting

VENUE :Baard Primary School, Noordsewer

URBAN DYNAMICS

KORYX COPPER

Knight Piésold CONSULTING

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Haib Minerals				
		Haib Minerals				
		Kominek				
		Comm Net				
		CommNet				
		Ministry of Education	Teacher			
		Ministry of Education	Teacher			
		MUEIYSAC	FLP Promoter			

@gmail.com



Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Mentor		7		
				06		
				3		
		NamWater				
				1		
		CHW Boonl Head of Agriculture				
		GRN				
		Koryx	Geo-Tech			
		Koryx Copper	Field Technician			
			driver	0		
1361210			Mechanic	02147401748		

Photographic Record



APPENDIX D.2.6 EIA, Women's Breakaway Session



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA: WOMEN'S BREAKAWAY FEEDBACK SESSION

Date: 22 April 2026 **File No.:** UDA 1281
Time: 19:30:00–20:00 **Cont. No.:**
Place: E.H.W. Baard Primary School, Noordoewer
Note Taker: Heidri Nel

Participants:	A total of eight women from the local community attended the feedback session, together with representatives of KC, KP and UDA. Refer to the attached attendance register. Personal contact details and stakeholder names have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Following the conclusion of the Main Community Feedback Meeting, Heidri Nel (UDA) welcomed the women who dedicated the breakaway session and thanked them for their continued participation.
1.2	Heidri Nel (UDA) explained that the session provided a smaller and more focused platform for women to raise questions, concerns and recommendations relating to the proposed Project, particularly matters affecting women, families, young people and vulnerable groups.
2.0	PURPOSE OF THE BREAKAWAY SESSION
2.1	The Women's Feedback Meeting was held as a breakaway session following the Main Community Feedback Meeting. Participants had therefore already received the Project and ESIA feedback presentation and participated in the broader community discussion.
2.2	The purpose of the breakaway session was to provide women with an additional opportunity to discuss social and community matters in a smaller group and to raise issues that may not have been fully discussed during the main meeting.
2.3	No separate Project or ESIA presentation was delivered during the breakaway session. The discussion built on the information presented during the Main Community Feedback Meeting.
3.0	DISCUSSION
3.1	Grievance Procedures and Contractor Behaviour

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Item No.	Description
	Community representatives asked how community members, particularly women, would be able to lodge complaints or grievances. Reference was made to concerns that could arise from contractor behaviour, including reckless driving in residential areas.
	Heidri Nel (UDA) explained that a grievance mechanism was being developed and would form part of the Project's management arrangements. In the interim, concerns could be reported at the Project office. It was further explained that the future grievance mechanism should be accessible to community members, including women.
3.2	Employment Applications and Reapplication
	A community representative asked whether people who had already submitted employment applications would need to apply again for future opportunities.
	The Project Team clarified that reapplication would not be required for the same position. However, where a new or different employment opportunity becomes available, interested applicants would need to submit a new application for that position.
3.3	Employment Opportunities for Older Women
	A community representative raised concern regarding employment opportunities for older women, including women over the age of 50, and asked whether age could limit access to employment.
	A representative of KC explained that employment decisions would take account of the requirements of each position, including the physical demands associated with particular roles. It was noted that opportunities for women would be available, although some physically demanding positions may affect the suitability of applicants for specific roles.
3.4	Fairness and Inclusion in Employment
	A community representative expressed concern regarding fairness and inclusion in employment and the perception that older people may be disadvantaged when applying for work.
	The Project Team explained that employment would be based on the requirements of the position and the suitability of applicants. It was further noted that KC has a Code of Conduct that applies to personnel and contractors associated with the Project.
3.5	Risks Affecting Young Girls and Vulnerable Groups
	Community representatives raised concern regarding social issues affecting young girls in Noordoewer, particularly their vulnerability in environments such as shebeens, where exploitation may occur.
	Heidri Nel (UDA) noted the concern and explained that community-based interventions were being considered. These included a proposed community centre, support for sports facilities such as netball grounds, and potential food-related initiatives aimed at supporting vulnerable groups.
3.6	Education and Early Childhood Development
	A community representative emphasised the importance of educational support programmes, particularly early childhood development and school-based initiatives.
	The Project Team noted that education-focused initiatives were being considered, including early childhood development programmes, and that collaboration with local schools was anticipated.
4.0	KEY MATTERS RAISED

Item No.	Description
4.1	The discussion highlighted the importance of accessible grievance procedures, fair and inclusive employment practices, opportunities for women of different age groups, support for young girls and vulnerable groups, educational initiatives and safe community spaces.
4.2	Participants also emphasised the need for practical community support that responds to existing social challenges in Noordoewer, particularly those affecting women, children and young people.
4.3	The Project Team noted that the matters raised would form part of the formal stakeholder engagement record and would be considered in the ongoing ESIA and Project planning processes, where relevant.
5.0	FOLLOW-UP MATTERS
5.1	The Project's grievance mechanism should be accessible to community members, including women, and should provide a clear process for reporting concerns relating to Project activities and contractor behaviour.
5.2	Future communication on employment opportunities should clearly explain application requirements and whether previous applicants are required to reapply.
5.3	Employment and recruitment processes should consider fairness and inclusion while taking account of the requirements of individual positions.
5.4	The concerns raised regarding young girls and vulnerable groups should be considered in future community development and social management initiatives.
5.5	Opportunities for educational support, early childhood development, sports facilities and other community-based initiatives should continue to be considered as the Project progresses.
6.0	MEETING CLOSURE
6.1	Heidri Nel (UDA) thanked participants for their open contributions and for raising matters affecting women, young people and vulnerable groups within the community. The issues raised were noted for inclusion in the stakeholder engagement record and consideration as the ESIA and Project planning progressed. The session was formally closed.

Photographic Record



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22 April 2026

APPENDIX D.2.7 EIA, Business, Farmers and Tourism Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA: FARMERS, BUSINESS AND TOURISM SECTOR FEEDBACK MEETING

Date: 23 April 2026 **File No.:** UDA 1281
Time: 13:00 - 16:30 **Cont. No.:**
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

Participants:	A total of 17 stakeholder representatives from the farming, business and tourism sectors attended the meeting, together with representatives of KC, KP and UDA. Refer to the attached attendance register. Personal contact details and stakeholder names have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Ernst Simon (UDA) opened the meeting, welcomed participants and thanked them for attending. He explained that the meeting formed part of the Impact Assessment Phase stakeholder engagement process for the proposed Haib Copper Project ESIA and provided a focused opportunity for representatives of the farming, business and tourism sectors to receive feedback on the assessment work and raise further questions, concerns and recommendations.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which stakeholder representatives introduced themselves. Participants were requested to complete the attendance register.
3.0	PURPOSE AND OBJECTIVES OF THE MEETING
3.1	Ernst Simon (UDA) explained that the meeting formed part of the Impact Assessment Phase stakeholder engagement process for the proposed Haib Copper Project ESIA.
3.2	The purpose of the meeting was to provide feedback on the proposed Project and the environmental and social assessment work undertaken to date, and to provide representatives of the farming, business and tourism sectors with an opportunity to discuss matters relevant to their activities, livelihoods and interests.

1 of 7

Item No.	Description
3.3	The objectives were to provide an update on the proposed Project and ESIA process; present the environmental and social assessment findings available at the time; discuss identified impacts and proposed mitigation and management measures; and obtain further stakeholder feedback for consideration in the ESIA process.
3.4	Participants were informed that the proposed mine would require a reliable water supply. The associated water abstraction, supply and storage infrastructure is subject to a separate environmental assessment process. Water-related matters raised during the meeting were nevertheless relevant to the Haib Copper Project because the proposed water supply is directly linked to the operation of the mine.
4.0	PRESENTATIONS
4.1	Joseph Mulders (KP) presented the environmental assessment findings and provided input on the ESIA and associated technical matters.
4.2	Ernst Simon (UDA) provided information on the stakeholder engagement process and facilitated the discussion.
4.3	Representatives of KC provided Project-related information and responded to questions where relevant.
5.0	DISCUSSION
5.1	Water Abstraction Licence and the Role of NamWater
	A representative of the farming sector raised concern regarding NamWater holding the abstraction licence and questioned whether this could create an advantage over private applicants.
	Joseph Mulders (KP) explained that NamWater would own and operate the associated water infrastructure and supply water to the mine. He noted that this arrangement was considered practical given NamWater's mandate in relation to bulk water supply in Namibia.
5.2	Environmental Assessment Process for the Associated Water Infrastructure
	A representative of the farming sector questioned whether the involvement of NamWater required a separate environmental assessment process.
	Joseph Mulders (KP) explained that the proposed activities remained substantially the same, although the applicant had changed. The assessment processes were separated following the Scoping Phase. The feedback engagement provided stakeholders with an opportunity to raise further questions regarding the relationship between the proposed mine and its associated water supply.
5.3	Reliability of River Flow Data and Monitoring Stations
	Representatives of the farming sector questioned the reliability of the river flow data and monitoring stations used in the assessment of the proposed Project water supply.
	Joseph Mulders (KP) and Ernst Simon (UDA) acknowledged the concern. It was explained that the hydrological modelling had been undertaken by the consultant appointed by ORASECOM using available datasets. The assessment relied on data from the Blouputs monitoring station, and concerns regarding the status and reliability of the available monitoring information were noted.

5.4	Minimum Flow Requirements at Blouputs
	A representative of the farming sector questioned how the minimum flow requirements at Blouputs were determined.
	Joseph Mulders (KP) explained that the minimum flow requirements take account of downstream water users, environmental water requirements, environmental losses and existing water uses.
5.5	Drought, Low-Flow Conditions and Off-Channel Storage
	Representatives of the farming sector raised concern regarding prolonged drought periods and the potential for water abstraction during low-flow conditions.
	Joseph Mulders (KP) explained that the proposed off-channel storage facility was intended to store water during higher-flow periods and reduce the need for abstraction during low-flow conditions. The proposed storage capacity and abstraction rates were informed by historical and predicted flow data.
5.6	Potential Effects on Downstream Water Users
	Representatives of the farming sector questioned whether the water required to support the proposed mine could reduce water availability for downstream users.
	Joseph Mulders (KP) explained that the relevant water resources study indicated that sufficient water would be available for abstraction during higher-flow periods. Abstraction would occur only when flows exceeded the applicable minimum flow threshold at Blouputs, which takes downstream water uses into account.
5.7	Future Development and Increasing Water Demand
	A representative of the farming sector questioned whether future developments and increasing water demand had been considered in the modelling.
	Joseph Mulders (KP) explained that stochastic modelling and climate scenarios had been considered in the specialist assessment and that future demand had therefore been taken into account.
5.8	Monitoring of Water Abstraction
	A representative of the farming sector questioned who would monitor abstraction activities and enforce restrictions on pumping.
	Ernst Simon (UDA) explained that monitoring systems and operational controls would need to form part of the applicable environmental management and operational arrangements for the associated water infrastructure.
5.9	Direct Engagement with Hydrology Specialists
	Representatives of the farming sector requested an opportunity to engage directly with the hydrology specialists responsible for the assessment.
	Joseph Mulders (KP) and Lionel Coetzee (KC) agreed that a dedicated engagement with the relevant specialists could be arranged.
5.10	Local River Flow Monitoring Infrastructure
	Representatives of the farming sector proposed that additional local river flow monitoring infrastructure be considered.
	Ernst Simon (UDA) noted that additional monitoring could be considered as part of future environmental management and operational controls.
5.11	Wastewater and Pollution Risks
	Representatives of the farming sector raised concern regarding wastewater pollution and potential contamination associated with the proposed mining activities.



	Joseph Mulders (KP) explained that no wastewater discharge was currently planned. Water would be recycled internally and reused within the mining process.
5.12	Tailings Storage Facility and Contamination Risks
	Representatives of the farming sector questioned whether the proposed tailings storage facility could contaminate groundwater or soils.
	Joseph Mulders (KP) explained that hydrogeological specialist studies had been undertaken to assess this risk. The findings indicated that, before mitigation, the expected risk was comparable to existing groundwater quality conditions. Proposed mitigation and monitoring measures include cut-off trenches and monitoring boreholes.
5.13	Comparison with Pollution at Tsumeb
	A representative of the farming sector questioned whether contamination impacts similar to those experienced at Tsumeb could occur at the proposed Haib Copper Project.
	Joseph Mulders (KP) explained that the proposed Project differs from the Tsumeb operation because it does not include smelting, which is a significant contributor to air, water and soil impacts. The relevant specialist studies had assessed the potential environmental risks associated with the proposed Haib Copper Project.
5.14	Grazing Access and Economic Displacement
	Representatives of the farming sector raised concern regarding potential economic displacement and restrictions on access to grazing areas.
	Joseph Mulders (KP) and Ernst Simon (UDA) acknowledged that economic displacement could potentially occur for grazers using the area near the Haib River mouth if access restrictions are introduced. It was explained that appropriate action plans and mitigation measures would be developed if the Project proceeds and would be incorporated into the relevant management arrangements.
5.15	Continued Participation in Water Management and Monitoring
	Representatives of the farming sector requested continued involvement in water management decisions and Project monitoring.
	Ernst Simon (UDA) emphasised the importance of continued engagement and noted that an ongoing water management forum or similar engagement mechanism could be considered.
5.16	Engagement with South African Authorities
	A representative of the farming sector questioned whether South African authorities had been engaged regarding the shared governance of the Orange River.
	Joseph Mulders (KP) explained that water abstraction and licensing considerations had, at that stage, been discussed with Namibian authorities and members of ORASECOM. Based on advice from the relevant Namibian authorities, engagement with South African counterparts would occur through the applicable formal processes.
5.17	Alternative Water Supply Options
	Representatives of the farming sector questioned whether alternative water supply options for the proposed mine remained under consideration.
	Joseph Mulders (KP) explained that pipeline alternatives and options associated with Neckartal remained under consideration but were not sufficiently advanced for detailed assessment at that stage.

5.18	Confidence in Hydrological Data and Modelling
	Representatives of the farming sector stated that they had difficulty relating to and placing confidence in the available hydrological data and modelling.
	Ernst Simon (UDA) and Joseph Mulders (KP) acknowledged the concern and indicated that relevant specialist information would be made available through the applicable assessment processes and that engagement with stakeholders would continue.
6.0	KEY MATTERS RAISED
6.1	The discussion was strongly focused on water availability and the proposed water supply required to support the Haib Copper Project. Key concerns related to hydrological data, minimum flow requirements, drought and low-flow conditions, downstream water users and the monitoring and management of future water abstraction.
6.2	Representatives of the farming sector emphasised the need for transparent and reliable water information, access to relevant specialist information, improved local monitoring and continued participation in water-related discussions.
6.3	Other matters directly related to the proposed mining development included wastewater management, potential groundwater and soil contamination, the tailings storage facility, grazing access and potential economic displacement.
6.4	A substantial part of the discussion focused on the proposed water supply required to support the Haib Copper Project. Some detailed questions related specifically to the associated water abstraction, supply and storage infrastructure, which is subject to a separate environmental assessment process. These matters were recorded because water supply is directly linked to the proposed mining development and was a key concern raised by representatives of the farming sector during the Haib Copper Project ESIA engagement.
7.0	FOLLOW-UP MATTERS
7.1	The concerns raised regarding the availability and reliability of water supply for the proposed Haib Copper Project should remain clearly documented in the ESIA stakeholder engagement record.
7.2	Relevant information on the Project's water requirements and associated environmental implications should be communicated clearly to affected stakeholders as the assessment processes progress.
7.3	Questions relating specifically to the associated water abstraction, supply and storage infrastructure should be addressed through the relevant separate environmental assessment process.
7.4	Continued engagement with representatives of the farming sector should be maintained on matters that may affect agricultural activities and livelihoods, including water availability, land access, grazing and potential economic displacement.
7.5	The request for access to relevant specialist information and further engagement on water-related matters should be recorded for follow-up by the relevant assessment team.
8.0	MEETING CLOSURE
8.1	Ernst Simon (UDA) thanked participants for their detailed contributions. He acknowledged that water availability and the proposed Project water supply were key concerns for representatives of the farming sector and noted that the matters raised would be recorded as part of the Haib Copper Project ESIA stakeholder engagement process. Questions relating specifically to the



associated water abstraction, supply and storage infrastructure would also be considered through the relevant separate environmental assessment process. The meeting was formally closed.

Attendance Registers

(personal contact details redacted from the public version)



DATE:	23/04/26	TIME:	09:00 – 11:00
PURPOSE OF MEETING:	ESIA for Haib Copper Mine Project - Noordoewer - FGD Farmers, Business and Tourism Sectors	VENUE:	Noordoewer Guesthouse

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		Bok WHK	Manager			
		BUSINESS				
		MHCade	OWNER			
		Bok WHK	Area Manager			
		Orss	Manager			
		ORUF	GM			
		ORUZ	CEO			
		Korsten	Manager			
		Silveto	Director			
		Sowop	Owner/MD			
		Banyri	Owner			



Name	Surname	Organisation	Position	Contact number	Email address	Signature
		PJ Farm	CEO			
		LFB	B officer			
		Business	owner			
		ONGAPADY	Owner / Secretary			
		VR Group	CEO			
		Gonop	PA			
		farmer	Owner			

Photographic Record



APPENDIX D.2.8 EIA, Constituency Development Committee Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA – CONSTITUENCY DEVELOPMENT COMMITTEE FEEDBACK MEETING

Date: 23 April 2026 **File No.:** UDA 1281
Time: 14:00–16:00 **Cont. No.:**
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

Participants:	Six stakeholder representatives attended the meeting, comprising representatives of the //Kharas Regional Council, the Constituency Development Committee, the Constituency Office, the Noordoewer Settlement Office and the education sector, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Several stakeholder representatives attending this meeting had also participated in the Regional Authority Feedback Meeting held on 22 April 2026. Refer to the attached attendance register. Personal contact details and stakeholder names have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Ernst Simon (UDA) opened the meeting, welcomed participants and thanked them for attending. He briefly explained the purpose of the engagement and encouraged participants to raise questions, concerns and recommendations regarding the proposed Haib Copper Project and the ESIA process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which stakeholders introduced themselves. Participants were requested to complete the attendance register.
3.0	PURPOSE AND OBJECTIVES OF THE MEETING
3.1	Ernst Simon (UDA) explained that the meeting formed part of the stakeholder engagement process for the proposed Haib Copper Project ESIA.
3.2	The purpose of the meeting was to provide feedback on the proposed Project and the environmental and social assessment work undertaken to date, and to provide members of the

1 of 5

Item No.	Description
	Constituency Development Committee with an opportunity to raise further questions, concerns and recommendations.
3.3	The objectives were to provide an update on the proposed Project and ESIA process; present the environmental and social assessment findings available at the time; discuss identified impacts and proposed mitigation and management measures; and obtain further stakeholder feedback for consideration in the ESIA process.
3.4	The meeting programme also included information on the proposed water supply infrastructure associated with the Haib Copper Project and the separate environmental assessment process for the water infrastructure.
4.0	PRESENTATIONS
4.1	Joseph Mülders (KP) presented the environmental assessment findings and provided input on the ESIA, the proposed water infrastructure and associated technical matters.
4.2	Robert Zipplies and Lionel Coetzee (KC) provided Project-related information and responded to questions concerning Project ownership, the Life of Mine, employee accommodation and potential opportunities for community participation.
4.3	Ernst Simon (UDA) facilitated the meeting and provided input on the stakeholder engagement and environmental assessment processes.
5.0	DISCUSSION
5.1	Appreciation for Investment in the Area
	A representative of the //Kharas Regional Council expressed appreciation for the proposed investment in the area.
	Ernst Simon (UDA) noted the comment. It was acknowledged as a general expression of support for the proposed investment rather than a specific environmental or social impact issue requiring further assessment.
5.2	Proposed Dam and Water Infrastructure
	A representative of the //Kharas Regional Council asked whether the dam shown on the Project map had already been constructed, whether the associated infrastructure still needed to be developed and whether the water would be suitable for drinking.
	Joseph Mülders (KP) explained that the dam had not yet been constructed and remained part of the proposed infrastructure. The associated infrastructure would be developed during future phases of the Project. The water would be sourced from the Orange River and would not be potable unless treated.
5.3	Potential Future Sale or Change in Project Ownership
	A CDC member asked whether there was an intention to sell the mine in the future.
	Robert Zipplies (KC) explained that future ownership could change depending on market conditions and shareholder decisions. Reference was made to comparable projects where different self-development or sale options had been considered. It was further explained that any future owner would typically be expected to honour the environmental and social commitments and obligations associated with the Project, including commitments extending beyond minimum regulatory requirements, where applicable.

Item No.	Description
5.4	Life of Mine, Potential Extension and Mine Closure
	A CDC member asked how the estimated Life of Mine of approximately 23 years had been determined, whether mining operations could continue beyond this period and what mine closure and rehabilitation would involve, including the management of the open pit.
	Lionel Coetzee (KC) explained that the estimated Life of Mine of approximately 23 years was based on the available mineral resource data, technical feasibility and economic factors. The operational period could change if additional resources were identified through further drilling or if favourable copper prices made additional extraction economically viable.
	It was further explained that closure planning formed part of the Project design and that rehabilitation measures would be implemented in accordance with applicable regulatory requirements and the approved closure planning framework.
5.5	Opportunity for Community Members to Purchase Shares
	A CDC member asked whether community members would have an opportunity to obtain shares in the company or the mine.
	Lionel Coetzee (KC), Robert Zipplies (KC) and Ernst Simon (UDA) explained that the company was associated with a listing on the Namibian Stock Exchange and that shares could be purchased through a registered broker. It was further noted that digital trading options might exist, although the availability of such options in Namibia was not confirmed during the meeting.
5.6	Employee Housing and Post-Closure Ownership
	A representative of the Constituency Office asked whether employees would have an opportunity to obtain ownership of housing units after mine closure.
	Robert Zipplies (KC) explained that the Project was still at the feasibility stage and that detailed accommodation and housing planning would be undertaken during the next phase. A combination of housing approaches was anticipated, including support for locally based employees, while rotational personnel might be accommodated in temporary facilities.
	It was further explained that post-closure ownership arrangements for Project-related housing had not yet been determined and would require further consideration during detailed Project planning.
5.7	Ongoing Cooperation and Sustainable Development
	Lionel Coetzee (KC) emphasised the importance of ongoing cooperation between the Project, local authorities and communities to support sustainable development outcomes.
	The discussion highlighted the need for continued coordination and engagement as Project planning progressed, particularly in relation to local development priorities, infrastructure, community expectations and the long-term relationship between the Project and surrounding communities.
5.8	Key Matters Raised
	The discussion highlighted stakeholder interest in the proposed investment, the status and purpose of the proposed water infrastructure, potential future changes in Project ownership, the estimated Life of Mine, mine closure and rehabilitation, opportunities for community participation through share ownership, employee housing arrangements and long-term cooperation between the Project, local authorities and communities.



Item No.	Description
	The Project Team confirmed that the matters raised would form part of the formal stakeholder engagement record and would be considered in the ongoing ESIA, Project planning and stakeholder engagement processes, where relevant.
6.0	FOLLOW-UP MATTERS
6.1	Information regarding the proposed water infrastructure will continue to be communicated through the relevant environmental assessment and stakeholder engagement processes.
6.2	Mine closure and rehabilitation requirements will continue to be addressed through Project planning and the applicable environmental management and closure planning processes.
6.3	Detailed employee accommodation and housing arrangements will be developed during future phases of Project planning.
6.4	Post-closure ownership arrangements for any Project-related housing have not yet been determined and will require further consideration as Project planning progresses.
6.5	The Project Team will continue to engage with the Constituency Development Committee, the Constituency Office, the Noordoewer Settlement Office, regional authorities and other relevant stakeholders as the Project progresses.
6.6	Continued cooperation between the Project, local authorities and communities will be encouraged to support sustainable development outcomes and alignment with local and regional priorities.
7.0	MEETING CLOSURE
7.1	Ernst Simon (UDA) thanked participants for their attendance and contributions. Participants were encouraged to remain engaged as the Haib Copper Project ESIA and associated Project planning processes progressed. The meeting was formally closed.



Attendance Registers

(personal contact details redacted from the public version)



DATE:	23/04/26	TIME:	11:00 – 13:00
PURPOSE OF MEETING:	ESIA for Hailb Copper Mine Project - Noordoewer – FGD CDC	VENUE :	Noordoewer Guesthouse

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		IKHAKAS REGIONAL COUNCIL	CHAIRPERSON			
		IKhakas Regional Council	Regional Councillor			
		Department of Environmental and Urban Affairs	Administrative Officer			
		CONSTITUENCY OFFICE	ADMINISTRATIVE OFFICER			
		CONSTITUENCY OFFICE	Senior Admin			
		ETIO Bored P. School	SCHOOL PRINCIPAL			

Photographic Record



APPENDIX D.2.9 EIA, Noordoewer Community Representative Committee Feedback Meeting



MEETING MINUTES

HAIB COPPER PROJECT
Environmental and Social Impact Assessment (ESIA)

EIA – NOORDOEWER COMMUNITY REPRESENTATIVE COMMITTEE FEEDBACK MEETING

Date: 23 April 2026
Time: 14:00–16:00
Place: Noordoewer Guesthouse, Noordoewer
Note Taker: Heidri Nel

File No.: UDA 1281
Cont. No.:

Participants:	Four representatives of local community structures attended the meeting, comprising representatives of the Noordoewer community committees, together with representatives of Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa. Refer to the attached attendance register. Personal contact details have been redacted from the public version of this report.
Regrets:	None
Distribution:	Koryx Copper, Knight Piésold Consulting and Urban Dynamics Africa.

Minutes and Action Items

Item No.	Description
1.0	WELCOME
1.1	Ernst Simon (UDA) welcomed participants and thanked them for attending the meeting. The purpose of the engagement was explained, and participants were encouraged to raise questions, concerns and recommendations.
1.2	The meeting formed part of a combined engagement programme during which information relating to the proposed Haib Copper Project and the associated water infrastructure was presented. These minutes focus on matters relevant to the Haib Copper Project mining ESIA, while recognising that some discussion also related to the associated water infrastructure and its separate environmental assessment process.
2.0	INTRODUCTION OF PARTICIPANTS
2.1	Members of the Project Team introduced themselves, after which the stakeholder representatives introduced themselves. Participants were requested to complete the attendance register.

Item No.	Description
3.0	PURPOSE AND OBJECTIVES OF THE MEETING
3.1	Ernst Simon (UDA) explained that the purpose of the meeting was to provide feedback on the environmental assessment work undertaken for the proposed Haib Copper Project and to provide stakeholders with an opportunity to raise comments, concerns and recommendations.
3.2	The objectives were to provide an update on the proposed Project and ESIA process; present the environmental and social assessment findings available at the time; discuss identified impacts and proposed mitigation and management measures; and obtain further stakeholder feedback for consideration in the ESIA process.
4.0	PRESENTATIONS
4.1	Joseph Mülders (KP) presented the environmental assessment findings and provided input on the ESIA and associated technical matters.
4.2	Robert Zipplies (KC) provided Project-related information and responded to questions concerning the proposed mining development, employment, recruitment, local content and community participation.
4.3	Information relating to the associated water infrastructure was also presented during the combined meeting programme. Matters specific to that infrastructure are addressed through its separate environmental assessment process.
5.0	DISCUSSION
5.1	On-site Medical Support:
	Participants sought clarification on whether a clinic would be constructed at the mine site and what medical support would be available during drilling. It was noted that there was a general understanding within the community that a clinic would be built.
	Robert Zipplies (KC) and Joseph Mülders (KP) clarified that no clinic is planned at this stage. Medical support is provided by a paramedic on site as part of the health and safety requirements for the drilling phase.
5.2	Employment Opportunities and Workforce Levels:
	Participants again raised questions regarding employment opportunities and expected job creation and sought further clarity on current and future employment levels.
	Joseph Mülders (KP) and Robert Zipplies (KC) explained that the number of workers on site had reached a plateau at the current stage of the Project and was expected to remain relatively stable for approximately the next two to three years. Contractors would, where possible, be required to prioritise local labour, depending on the nature of the work and required skills.
5.3	Local Content and Definition of “Local”:
	Participants raised concerns regarding how local people would benefit from the Project and noted continued uncertainty regarding how local content would be defined and applied.
	Ernst Simon (UDA) explained that local content arrangements still needed to be developed. It was acknowledged that defining “local” is complex and would require further stakeholder engagement. A possible workshop to clarify how local content would be defined and applied was discussed.

5.4	Transport and Logistics Options:
	Participants asked whether rail transport, including transport via Grünau, was being considered and whether the Project's transport arrangements could support economic opportunities in surrounding areas.
	Joseph Mülders (KP) explained that transport options remained under assessment as part of the feasibility stage and that no final decisions had been made. The options would be evaluated based on technical and economic feasibility.
5.5	Access to Project Information:
	Participants raised concerns that Project information and processes were mainly accessible through the website, which may not be easily accessible to community members without reliable internet access.
	Robert Zipplies (KC) acknowledged the concern and explained that alternative methods, including paper-based options, may need to be considered to improve accessibility.
5.6	Grievance Mechanism:
	Participants sought clarification on how grievances and complaints could be submitted, including where forms could be obtained and who would be responsible for receiving and managing complaints.
	Joseph Mülders (KP) explained that a grievance mechanism forms part of the Environmental Management Plan and would be implemented as a formal requirement. The process would need to be accessible, with clear procedures and designated responsible personnel.
5.7	Submission of CVs, Business Proposals and Applications:
	Participants raised concerns regarding how community members could submit CVs, business proposals and applications, including where these should be submitted and whether they were properly received and considered.
	Robert Zipplies (KC) explained that submissions could currently be made through the Koryx Copper office in Noordoewer, with Willie de Klerk acting as a contact person. It was acknowledged that this was not a dedicated function and that a designated person may be required to manage submissions more effectively in future.
5.8	Feedback to Applicants:
	Participants expressed concern that community members did not receive feedback after submitting CVs, proposals or applications, creating uncertainty about whether submissions had been received or considered.
	Robert Zipplies (KC) and Ernst Simon (UDA) acknowledged that feedback was currently limited. The potential use of systems such as SMS notifications was discussed. It was noted, however, that it may only be feasible to contact shortlisted candidates and that unsuccessful applicants may not receive individual feedback.
5.9	Recruitment Requirements and Transparency:
	Participants raised concerns that job requirements and qualification criteria were not always clearly communicated and that unsuccessful applicants did not understand why they had not been selected.
	Concerns were also raised regarding the fairness and transparency of the recruitment process, with some participants indicating that they believed they should have been selected based on their qualifications.

	Robert Zipplies (KC) explained that recruitment decisions are based on the requirements of each role and candidate suitability. The need for clearer communication of job requirements and recruitment processes was acknowledged.
5.10 Tailings Storage Facility and Natural Drainage:	
	Participants raised concerns regarding the potential effects of the tailings storage facility on natural drainage systems and water flows in the area.
	Joseph Mülders (KP) explained that multiple locations had been assessed and that drainage systems had been considered in the design to minimise potential impacts.
5.11 Stormwater Management:	
	Participants raised further concerns regarding stormwater flows during heavy rainfall events and whether the Project could affect water movement into surrounding areas and Noordoewer.
	Joseph Mülders (KP) explained that hydrological studies had been undertaken and that stormwater management measures had been incorporated into the design.
5.12 Tailings Storage Facility Failure Risk:	
	Participants raised concerns regarding the risk of tailings storage facility failure and the potential consequences of such an event.
	Robert Zipplies (KC) explained that such failures are rare and generally associated with inadequate management. International standards would be applied to minimise risk.
5.13 Worst-case Environmental Scenarios:	
	Participants sought clarification on worst-case environmental scenarios and how these would be managed.
	Joseph Mülders (KP) explained that worst-case scenarios had been modelled and that mitigation measures had been identified to manage potential risks.
5.14 Chemical Contamination:	
	Participants raised concerns regarding potential chemical contamination, including the use of acid, and possible impacts on the environment.
	Joseph Mülders (KP) explained that modelling indicated that potential impacts would remain within acceptable limits and would be managed through the proposed mitigation and management measures.
5.15 Groundwater Quality:	
	Participants raised concerns regarding existing groundwater quality and whether the Project could worsen current conditions.
	Joseph Mülders (KP) explained that groundwater in the area is naturally of low quality and that Project-related impacts are expected to be localised and managed.
5.16 Environmental Monitoring:	
	Participants requested clarification on how environmental impacts would be monitored over time, including how ongoing monitoring would be implemented and reported.
	Joseph Mülders (KP) explained that monitoring systems, including monitoring boreholes and seepage control measures, would be implemented as part of the Project's environmental management requirements.



5.17	Key Matters Raised:
	The discussion highlighted recurring concerns regarding employment, the definition of “local”, local content, recruitment transparency, access to Project information and grievance procedures. Environmental concerns focused primarily on the tailings storage facility, drainage and stormwater management, groundwater quality, contamination risks and long-term environmental monitoring.
	The Project Team confirmed that the matters raised would form part of the formal stakeholder engagement record and would be considered in the ongoing assessment and reporting process where relevant to the proposed mining development.
6.0 FOLLOW-UP MATTERS	
6.1	The need for further engagement on the definition of “local” and the development of Project local content arrangements was noted.
6.2	The need to improve access to Project information through alternative communication methods, including paper-based options where appropriate, was noted.
6.3	The need for clear and accessible grievance procedures, including designated responsibility for receiving and managing complaints, was noted.
6.4	Concerns relating to the submission of CVs, business proposals and applications, and the provision of feedback to applicants, will remain matters for continued Project planning and community engagement.
6.5	Environmental concerns relating to the tailings storage facility, stormwater, groundwater, contamination risks and environmental monitoring will remain part of the formal stakeholder engagement record and will be considered through the ESIA and environmental management process.
7.0 MEETING CLOSURE	
7.1	Ernst Simon (UDA) thanked participants for their attendance and contributions. Participants were encouraged to remain engaged as the Haib Copper Project ESIA progressed and to participate in future opportunities for review and comment. The meeting was formally closed.



Attendance Registers

(personal contact details redacted from the public version)



DATE:	23/04/26	TIME:	14:00 – 16:00
PURPOSE OF MEETING:	ESIA for Halib Copper Mine Project - Noordoewer – FGD NCRC	VENUE:	Noordoewer Guesthouse

ATTENDANCE REGISTER

Name	Surname	Organisation	Position	Contact number	Email address	Signature
		NIRC	Treasurer			
		NCRC	Secretary			
		NCRC	Chairperson			
		NCRC	Vice Chair			

Photographic Record



APPENDIX D.3.1 WATER ABSTRACTION STRATEGY – FARMERS, BUSINESS AND TOURISM SECTOR FOLLOW-UP MEETING PRESENTATION – 12 AUGUST 2026

In the Room

Independent Consultant	Applicant / Proponent	Developer
Knight Piesold Consulting (Pty) Ltd - Joseph Mulders- EAP - Lima Maartens- EAP - Amelia Briet- Env - Heidi Bindemann- Soc - Ernst Simon- Soc - Hugh Bruce- Eng - Kevin Stols- Eng - Marie Mare- Eng	Namibia Water Corporation Ltd. - Lacarus Mhumba- PM - Franklin Kavitha (Bus Unit South Operations Manager) - Jolanda Kamburona- Env - Dr Godfrey Pazvakawambwa	Haib Minerals (Pty) Ltd / Koryx Copper Lionel Coetzee (Country Manager)



Haib Copper Project

Water Abstraction Strategy and Scheme to supply the Haib Copper Project

Knight Piesold CONSULTING Adding value. Delivering results.

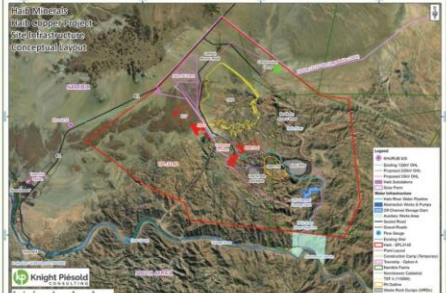
Purpose

- To address key queries on the Water Abstraction Strategy requested by Stakeholders
- Ensure all parties are fully informed on the modelling, scheme description, development and operation

This is not a presentation of the Proposed Water Abstraction and Supply Activities EIA process and outcomes

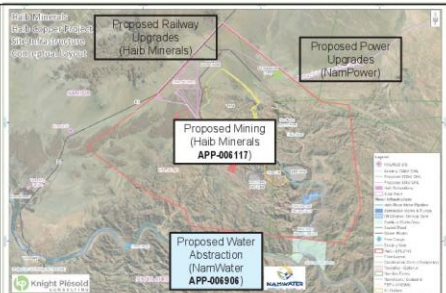
Meeting Rules

- Presentation will be in English
- Please mute yourself during the presentation
- Opportunity for questions after each section
- Please raise your hand and you will be requested
- Introduce yourself when asking a question
- Work through the facilitator
- Questions and answers can be in English or Afrikaans
- Please allow everybody to participate and don't interrupt the speakers
- Permission to record the session to capture all responses/comments



Agenda / Outline

Independent Consultant	Applicant / Proponent
Knight Piesold Consulting (Pty) Ltd	Namibia Water Corporation Ltd.
1. Preamble: The Haib Copper Project	
2. Orange River Resource & Demand Modelling	
3. Orange River Scheme Description	
4. Orange River Scheme Development & Operation	
5. Discussion/ Queries/ Comments	
6. Way Forward / Next Steps	



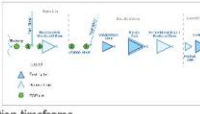
Haib Copper Project and Water Supply Scheme Background

- The Project:** Open pit copper mine and associated infrastructure
- Location:** 20 km from Noordoewer on EPL 3140
- Project Phase:** Pre-feasibility phase and investigations ongoing depends on economic and impact feasibility studies
- Important:** Project not a guarantee and depends on outcomes of feasibility studies
- The Plan:** Apply for various ECCs through the Competent Authorities and MEFT

Orange River Resource & Demand Modelling

Overview – Resource Modelling

- Several recent assessments of the Orange River system have included water demands for Haib Mine:
 - Demands ranging from 3 Mm³/a to 10 Mm³/a
 - Implementation ranging from 2010 to 2027
- Updated assessments were commissioned to account for an updated water demand and implementation timeframe.
- The same Orange River system Water Resources Yield Model (WRYM) and Water Resources Planning Model (WRPM) software models used by DWS (SA) and ORASECOM were used
- The same approach as the Annual Operating Analyses (most recent at the time: 2024) and other assessments was followed
- Assessments based on the 2024 Annual Operating Analysis, updated, and based on analyses via different scenarios



Knight Plesold
Haib Copper Project Orange River Scheme

Discussion

Independent Consultant	Applicant / Proponent
Knight Plesold Consulting (Pty) Ltd	Namibia Water Corporation Ltd.
1. Preamble: The Haib Copper Project	
2. Orange River Resource & Demand Modelling	
3. Orange River Scheme Description	
4. Orange River Scheme Development & Operation	
5. Discussion/ Queries/ Comments	
6. Way Forward / Next Steps	

Knight Plesold
Haib Copper Project Orange River Scheme

Orange River Resource & Demand Modelling

Resource Modelling: Approach and Scenarios

- Three base scenarios were defined:
 - Base Scenario 1: 2024 'current' development level
 - Base Scenario 2: 2035 Development Level: Near-future known, planned developments, incl. Polihali Dam & Transfer Tunnel, etc.
 - Base Scenario 3: 2035 Development Level: Near-future / Veldkruit Dam (NVD, 2035) & Veldkruit Dam (2035)
- Latest form of the Environmental Water Requirements (EWR) set by DWS SA included (same pattern as natural flows)
- Different sub-scenarios were defined to investigate different abstraction volumes, different means of abstraction (continuous / surplus flows), different abstraction rates and different volumes of the off-channel storage dam
- Thereafter sensitivity analyses were conducted for some parameters

Knight Plesold
Haib Copper Project Orange River Scheme

Orange River Resource & Demand Modelling



Knight Plesold
Haib Copper Project Orange River Scheme

Phase	Progress/Status	Application Focus
Screening	1. Application of ECC to NMA and MEFT: July 2025 2. Screening Notice provided by MEFT: July 2025	Haib Copper Project
Scoping (Defining the ToR)	3. ISAP Identification and Notification: July/August 2025 4. Scoping Phase Public Consultations: August 2025	Haib Copper Project
Registration	5. Sub mission of SID to the NMA-FRL and MEFT: February 2025 6. Screening Notice provided by MEFT: February 2025	Water Abstraction
Impact Reporting (EIA) & Environmental Management Plan (EMP)	7. ISAP Review and Comment on Rev A: 6 May to 9 June 2025 8. ISAP Review and Comment on Rev B: 10 July to 17 August 2025 9. Targeted Consultations / Water Abstraction Strategy – 12 August 2025 (We are here today) 10. Update EIA based on comments received – PENDING 11. Submit application package – PENDING	Water Abstraction
Decision Making	12. Authority assessment and decision by CA – PENDING	Water Abstraction
Appeal	13. EAP to notify registered GPs of decision and rights to appeal – PENDING	Water Abstraction

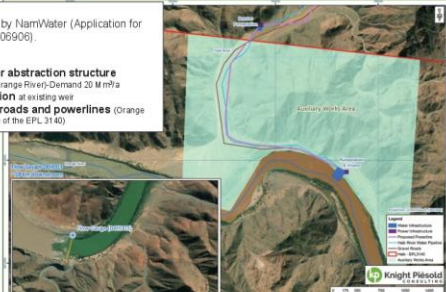
Knight Plesold
Haib Copper Project Orange River Scheme

Proposed Activities:

Water supply activities by NamWater (Application for ECC in process APP-006906).

This includes:

- A side intake water abstraction structure (Northern bank of the Orange River-Demand 20 Mm³/a)
- Flow gauging station at existing weir
- Delivery pipeline, roads and powerlines (Orange River to the outside edge of the GFA, 31 km)



Knight Plesold
Haib Copper Project Orange River Scheme

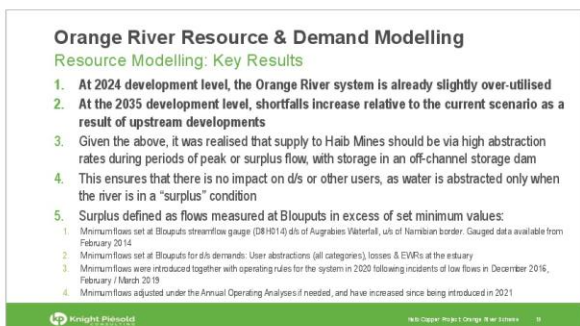
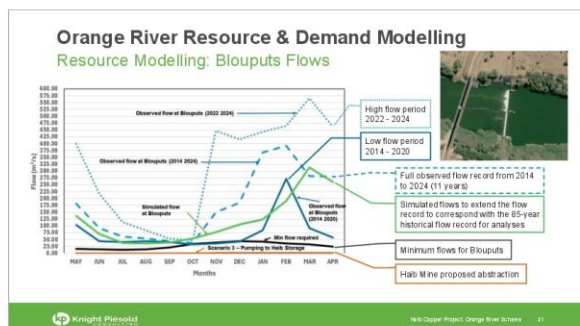
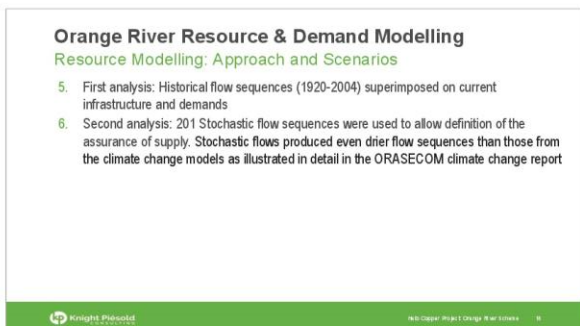
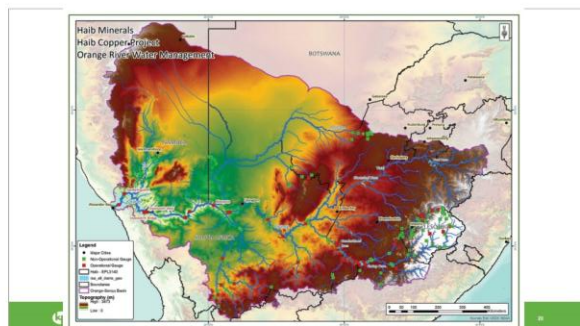
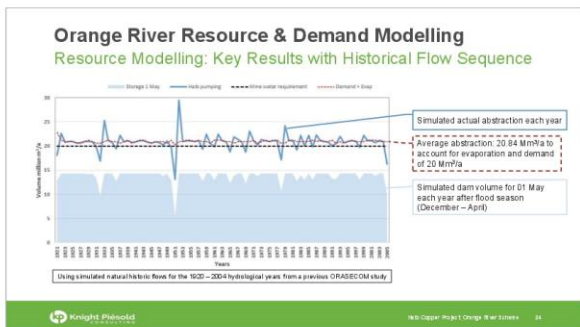
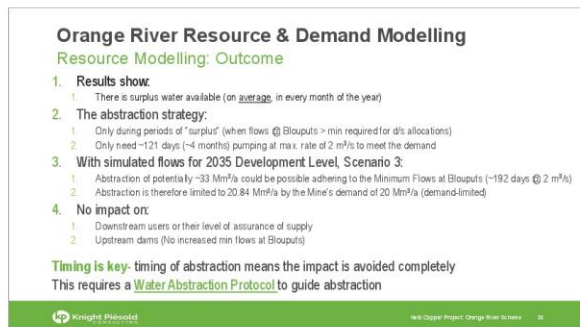
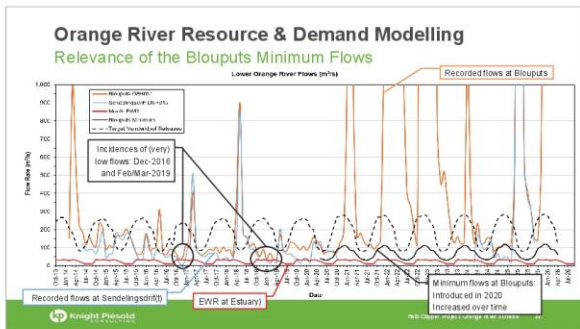
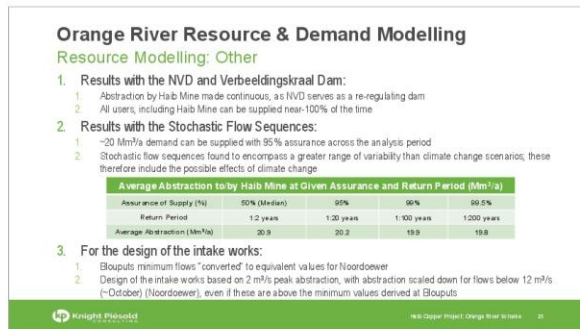
Outline:

- Results of Orange River Resource & Demand Modelling
- Proposed Orange River Scheme Description
- Proposed Orange River Scheme Development & Operation

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Haib Copper Project Orange River Scheme

Phase	Progress/Status	Application Focus
Screening	1. Application of ECC to NMA and MEFT: July 2025 2. Screening Notice provided by MEFT: July 2025	Haib Copper Project
Scoping (Defining the ToR)	3. ISAP Identification and Notification: July/August 2025 4. Scoping Phase Public Consultations: August 2025 5. Sub mission of SID to the NMA-FRL and MEFT: February 2025 6. Screening Notice provided by MEFT: February 2025	Haib Copper Project
Registration	7. ISAP Review and Comment on Rev A: 6 May to 9 June 2025 8. ISAP Review and Comment on Rev B: 10 July to 17 August 2025 9. Targeted Consultations / Water Abstraction Strategy – 12 August 2025 (We are here today) 10. Update EIA based on comments received – PENDING 11. Submit application package – PENDING	Water Abstraction
Impact Reporting (EIA) & Environmental Management Plan (EMP)	12. Authority assessment and decision by CA – PENDING	Water Abstraction
Decision Making	13. EAP to notify registered GPs of decision and rights to appeal – PENDING	Water Abstraction
Appeal		Water Abstraction

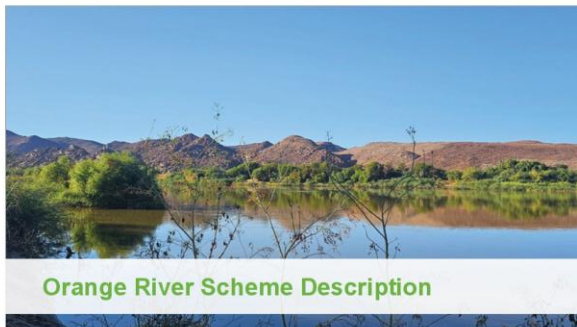
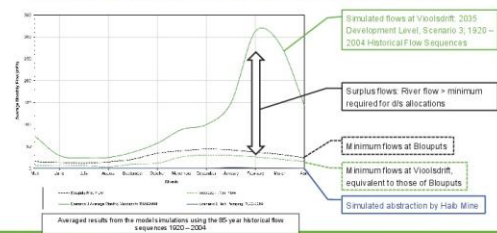
Knight Plesold
Haib Copper Project Orange River Scheme



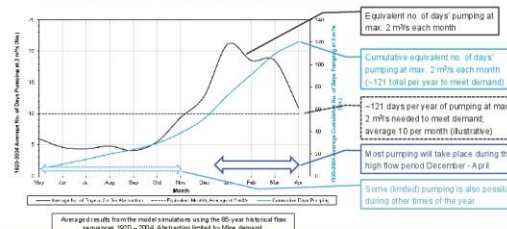
Discussion

Independent Consultant	Applicant / Proponent
Knight Piésold Consulting (Pty) Ltd	Namibia Water Corporation Ltd.
1. Preamble: The Haib Copper Project	
2. Orange River Resource & Demand Modelling	
3. Orange River Scheme Description	4. Orange River Scheme Development & Operation
5. Discussion/ Queries/ Comments	
6. Way Forward / Next Steps	

Orange River Resource & Demand Modelling Resource Modelling: Flows and Abstraction at Vioolsdrift



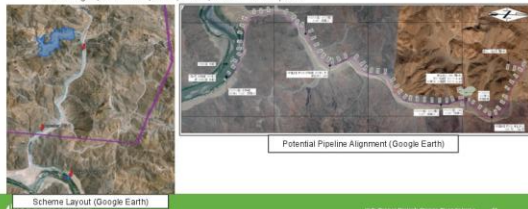
Orange River Resource & Demand Modelling Resource Modelling: Pumping for Haib Mine



Orange River Scheme Description

2. Pipeline and Booster Pump Stations (APP-006117 in EPL 3140 and APP-006906 out)

1. Twin DN800 mm diameter, PN20 HDPE pipelines, 9.2 km long along the Haib River (buried)
2. Two booster pump stations, each featuring the same submersible pumps as the intake works, with cooling jackets; channage 3,640 m and 8,500 m, each 1,800 kW installed power



Orange River Scheme Description

1. Scheme design for 20 Mm³/a demand, overall ~20.84 Mm³/a abstraction

2. Intake works (APP-006906):

1. Situated on the outside of a bend in the river u/s of the Haib – Orange River confluence
2. Consists of 4 hopper bays, each 5.8 m deep and equipped with 2x submersible pumps, 6+2 configuration overall, 3,600 kW installed power
3. Jet pumps are provided in each hopper for intermittent removal of coarse sediment

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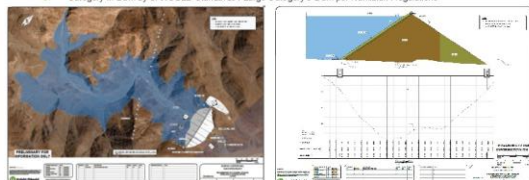
4. Off-Channel Storage Dam (APP-006117):

1. Nominal 20 Mm³ volume off-channel storage or holding dam
2. Concrete-Faced Rockfill Dam (CFRD), 75 m high, approximately 2 Mm³ of embankment volume
3. Category III Dam by SANICOLD Standards / Large Category 3 Dam per Namibian Regulations

Orange River Scheme Description

3. Off-Channel Storage or Holding Dam (APP-006117):

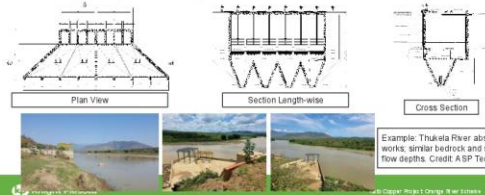
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Orange River Scheme Development and Operation

Basic Principles

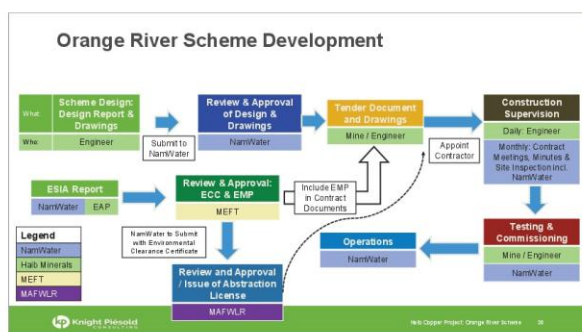
1. Haib Minerals will develop the scheme (design, construction, capex)
2. The completed scheme will be handed-over to NamWater to own & operate, to supply water to the mine
3. Scheme must comply with NamWater's standards and requirements
4. NamWater is applying for the ECC as eventual scheme owner & operator
5. NamWater is applying for the abstraction license with MAFWLR as the eventual scheme owner & operator
6. Memorandum of Understanding (MoU) has been signed between Haib Minerals and NamWater
7. Further agreements to cover infrastructure development & hand-over will be developed
8. NamWater will be responsible for implementing the conditions of the ECC and the EMP

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Haib Copper Project: Orange River Scheme 37

Discussion

Independent Consultant	Applicant / Proponent
Knight Piesold Consulting (Pty) Ltd	Namibia Water Corporation Ltd.
1. Preamble: The Haib Copper Project	
2. Orange River Resource & Demand Modelling	
3. Orange River Scheme Description	
4. Orange River Scheme Development & Operation	
5. Discussion/ Queries/ Comments	
6. Way Forward / Next Steps	

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Proposed Orange River Scheme Development & Operation

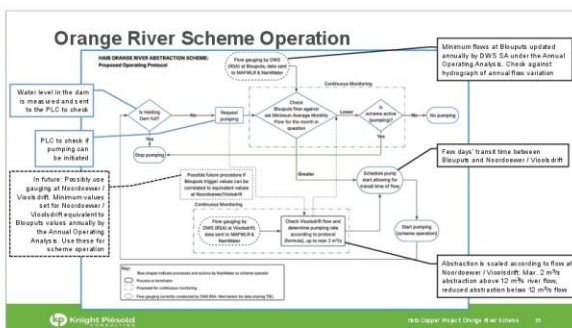


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Discussion

Independent Consultant	Applicant / Proponent
Knight Piesold Consulting (Pty) Ltd	Namibia Water Corporation Ltd.
1. Preamble: The Haib Copper Project	
2. Orange River Resource & Demand Modelling	
3. Orange River Scheme Description	
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5. Discussion/ Queries/ Comments	
6. Way Forward / Next Steps	

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Key Concerns from SHs: Water Abstraction



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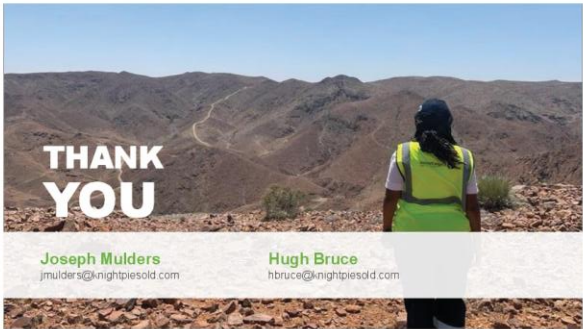
Orange River Scheme Development and Operation

Scheme Development and Operation: Outcome

1. The operation of a bulk water supply by NamWater on behalf of a large operation is not new. NamWater applies this model at *Rosh Pinah / Skorpion Mines* (Orange River), supply to mines in the *Erongo Region*
2. NamWater will provide information on abstraction to MAFWLR and the DWS (SA) Annual Operating Analyses
3. NamWater assures compliance with the strategy of abstraction only in periods of "surplus" as per the Water Abstraction Protocol (WAP)
 1. If this is not the case, the relevant Ministry will provide oversight (Pending conditions)
 2. The Haib Mine relies on this license and thus will additionally support compliance where possible to ensure ongoing compliance
4. NamWater and water users must work together to optimal outcomes for all

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Haib Copper Project: Orange River Scheme 44

Way Forward / Next Steps Outcome 1. Current Rev B EIA and appendices review period (7 to 21 August 2026) 2. Address comments received 3. Submit Rev C to the CA and MEFT.	Summary Comments and Responses Outcome 1. Substantial comments received from SH (April FG and Rev A Reviews) 1. Today's focus was on those to the Water Abstraction Strategy 2. Towards addressing these: 1. Edits to the Revision A EIA and appendices 2. Updates to existing specialist studies and commissioning of new studies 3. Additional review step for SHs to provide comment on Revision B EIA and appendices (Date: 7 to 21 August) 4. Additional engagement inclusive of NamWater and specialists to address concerns prior to submission of application for ECC (Date: 12 August)
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 THANK YOU Joseph Mulders jmulders@knightpietsoold.com Hugh Bruce hbruce@knightpietsoold.com	 Discussion / Queries / Comments
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APPENDIX D.3.2 WATER ABSTRACTION STRATEGY – FARMERS, BUSINESS AND TOURISM SECTOR FOLLOW-UP MEETING MINUTES



MEETING MINUTES

EIA Phase: Water Abstraction Strategy - Farmers, Business and Tourism Sector Follow Up Meeting

Date:	12 August 2026		
Time:	10:00 - 12:20	Place:	MS Teams
Facilitator:	Ernst Simon	Note Taker:	Amelia Briel

Attendance Register

NAME	INITIALS	COMPANY
PRESENT		
Godfrey Pazvakawambwa	GP	NamWater
Esley Kandrozu	EK	NamWater
Johannes Sirunda	JS	NamWater
Franklin Kavita	KF	NamWater
Lazarus Muhimba	LM	NamWater
Henry Mukendwa	HM	NamWater
Jaco Coetzee	JC	NamWater
Shinana Abednego	SA	NamWater
Jolanda Kamburona	JK	NamWater
Lionel Coetzee	LC	Koryx Copper
Joseph Mülders	JM	Knight Piésold (KP)
Amelia Briel	AB	Knight Piésold
Hugh Bruce	HB	Knight Piésold
Ernst Simon	ES	Urban Dynamics
Heidri Bindemann-Nel	HBN	Urban Dynamics
Lima Maartens	LMa	LM Environmental Consulting
Manie Mare	MM	WRP
Carike Johnson	CJ	
Melanie Greeff	MG	
Zelda van Dyk	ZvD	Karsten
Marais vd Merwe	MvdM	
Yvonne Jansen	YJ	
Kevin Liddle	KL	Silverlands
Mark Kampers	MK	

Koryx Copper

EIA Phase: Water Abstraction Strategy - Farmers, Business and Tourism Sector Follow Up Meeting

NAME	INITIALS	COMPANY
Matthias Jauss	MJ	
Tanja Dahl	TD	NAU
Theo Jauss	TJ	
Albert van der Merwe	AvdM	Sonop
Olaf Liebich	OL	
Alwyn Van Der Merwe	AlvdM	Vivo Energy
Cathryn Struwig	CS	
Ndina Nashipili	NN	MAWFLR
Selma Kalili	SK	MAWFLR
Edward Godfried	EG	
Alfeus Moses	AM	
Willem Visser	WV	Silverlands
APOLOGIES		
None		
DISTRIBUTION		
All attendees		

Meeting Record

Item No.	Description				
1.0	WELCOME				
	ES welcomed participants to the meeting and explained the meeting rules.				
2.0	INTRODUCTION OF PARTICIPANTS				
	ES introduced the NamWater, Koryx and consultancy teams				
3.0	PURPOSE AND OBJECTIVES OF MEETING				
	ES explained the purpose of the meeting.				
4.0	PRESENTATIONS				
	JM presented the overview of the Haib Copper Project				
	HB presented on the Orange River Resource & Demand Modelling				
	HB presented the Orange River Scheme Description				
	FK presented the Orange River Scheme Development & Operation				
5.0	DISCUSSION				
5.1	Queries raised on demand modelling				
	<table> <tr> <th>Query / Comment</th><th>Consolidated response</th></tr> <tr> <td>TD (NAU):</td><td>JM (KP):</td></tr> </table>	Query / Comment	Consolidated response	TD (NAU):	JM (KP):
Query / Comment	Consolidated response				
TD (NAU):	JM (KP):				

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EIA Phase: Water Abstraction Strategy - Farmers, Business and Tourism Sector Follow Up Meeting

Item No.	Description
	- Is there potential for pollution of the Orange River from the mine? - What will happen in an El Nino / Super El Nino scenario? - If there is inadequate water to abstract, what will the mine do? - Would the mine managing a storage dam not lead to a conflict of interest?
	- The Water Abstraction Protocol (WAP) is key to accountability - The basis of defining minimum flow is more complicated than presented, as the extent of issued water rights are not known.
	- Where is the WAP? - We have low confidence in the minimum flows, as we experience system challenges on a daily basis. - Droughts are cyclical, what will be the impact on the mine, especially since we're expecting the next drought cycle? - Has evaporation been included in your calculations?
	NN (MAWFLR): - Is the dam in question the Noordoewer / Vioolsdrift Dam? Pollution risks are included in the mine's Environmental and Social Impact Assessment (ESIA) in terms of surface water, groundwater and dust. Studies show low risks of pollution reaching the Orange River when mitigations are in place. HB (KP): - The dam being discussed is not the Noordoewer Vioolsdrift Dam, but an off-channel dam as part of the Haib Copper Project. - The off-channel dam serves as a buffer. The mine will use water from the dam rather than the river directly. It balances inflow and outflow. - There will be no abstraction by NamWater if there's insufficient water in the Orange River. The mine must assess risks and will scale back operations if there's insufficient water in the dam to support full operations. MM (WRP): - Stochastic analysis was conducted on historical sequences. It shows that the off-channel dam can achieve 1:200-year assurance of supply of 19.8 Mm³ at 99.5% assurance. - There are also other restrictions in the catchment during very dry periods. GP (NamWater): - The operation of the WAP will have minimal impact. - NamWater will be responsible for checking gauging stations on the ground and can give feedback to MAWFLR and downstream water users. - If there are any future dam projects on the Orange River, NamWater will be involved. HB (KP): - NamWater and Haib are negotiating a contract for operation of the abstraction according to the WAP. JS (NamWater): - Ownership and operation of the dam rest with the State. NamWater are discussing battery limits with Koryx. ES (Urban Dynamics):

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EIA Phase: Water Abstraction Strategy - Farmers, Business and Tourism Sector Follow Up Meeting

Item No.	Description	
		Evaporation and the Orange River Environmental Water Requirement (EWR) are included in the modelling.
5.3	Queries raised on operation of the WAP	
	Query / Comment	Consolidated response
	I - The farmers are in a vulnerable position. How will the protocol be implemented and monitored? - We need guarantees and transparency. - Is the Protocol part of the Environmental Management Plan (EMP)?	ES (Urban Dynamics): - The WAP is part of the NamWater EMP and will be implemented as such. - Koryx will conduct regular engagement with farmers via a water user forum. - KP, NamWater and Koryx will recommend additional strategies to ensure transparency on the WAP. This could take place via the Namibian Grape Growers Association.
	NN (MAWFLR): - I hear stakeholders asking how government can give them comfort on water use. This project will use the same strategy as in the central region where various participants are present. We can duplicate that system. - There is collaboration between South Africa and NamWater to correct the water allocation. - I support a flow gauging station at Violsdrift or Noordoewer.	GP (NamWater): The WAP will be part of the EMP. The annual abstraction strategy will be informed by the live system managed by ORASECOM.
	/ - There are lots of plans and figures presented. However, the daily reality is low comfort on the management in place for the Orange River system. The information is academic, but nevertheless useful. - The reason for the low comfort is that there is no written information available on actual allocations. This is a process between NamWater and the Ministry. - We will provide further written submissions.	MM (WRP): - Namibia is at the end of the river system, hence the Blouputs-levels process. - There are agreements in place between South Africa and Namibia for releases from the Gariep and Van der Kloof Dams. HM (NamWater): - We require a forum or a task force for the operation of the system. JM (KP): - Implementation of the EMP will be part of the conditions of the Environmental Clearance Certificate (ECC). The WAP Framework is part of the current EMP, and this is available for review. - The final WAP will be a live document and will be updated / refined as more information becomes available. However, the principles in the Framework will remain unchanged (no abstraction unless surplus flow). - Any changes in the WAP must be communicated to stakeholders in a water user forum.
	NN (MAWFLR): - Water Licences are issued by the Ministry. Licence conditions include water abstraction returns. These are needed for modelling and determining actual use. - A platform is needed for the Lower Orange system. MAWFLR are establishing a forum for the Orange / Fish system.	

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EIA Phase: Water Abstraction Strategy - Farmers, Business and Tourism Sector Follow Up Meeting

Item No.	Description
6.0	FOLLOW UP MATTERS
	JM emphasised that the NamWater EIA and EMP (Revision B) are available for review until 21 August. KP will address comments received and then submit Revision C to authorities for evaluation and decision.
7.0	MEETING CLOSURE
	ES thanked all participants for attending and closed the meeting.

Attendance Register (extract from Teams meeting record)

Name	Email
Joseph Mülders	
Godfrey Pazvakawambwa	
Hugh Bruce	
Kandorozi Esley	
Carike Johnson	
Ernst Simon	
Amelia Briel	
Heidri Bindemann-Nel	
Sirunda Johannes	
Melanie Greeff	
Zelda van Dyk	
Marais vd Merwe	
Lima Maartens	
Yvonne Jansen	
Manie Mare	
Lionel Coetzee	
Kevin Liddle	
Mark Kampers	
Matthias Jauss	
read.ai meeting assistant (Unverified)	
Tanja Dahl	
Theo Jauss	
Albert van der Merwe	
Olaf Liebich	
Kavita Franklin	

APPENDIX E – WRITTEN STAKEHOLDER CORRESPONDENCE

APPENDIX E.1 – EIA Phase

esiahailb@udanam.com From: Joseph Mulders <jmulders@knightiesold.com> Sent: Monday, 25 May 2026 11:37 am To: Quzette Bosman Cc: Subject: RE Haib Copper Project - IAP Comment - Achill Island Investments Good Morning Quzette, Thank you kindly for sending the comments from your client they are well received. We will work through them and provide detailed responses in due course. Based on comments received to date please note the following: 1. KP will be sending out invites to a dedicated QnA information session to discuss aspects of the Water Resources and Water Demand study. Dates are not yet set as we are currently in discussion with NamWater on this aspect and working on reviewing all comments received to ensure an effective session. 2. As requested, we have further extended the review period by 2 weeks to 9 June 2026. We trust this period since the 6th May will be sufficient for meaningful review. Please note we are committed to allowing adequate opportunity for comments to ensure all concerns are considered and included in the application for ECC. Thank you again. Joe Joseph (Joe) Mulders Senior Environmental Scientist Knight Piesold (Pty) Ltd. T: +27 11 806 7111 D: 0727542603 1 Discovery Place, The Ridge, Sandhurst Sandton Gauteng 2196 South Africa twitter linkedin facebook  ISO 9001:2015 Certificate No: 212061140/5 ISO 14001:2015 Certificate No: 170414034/2 ISO 45001:2018 Certificate No: 271012064/3 From: Quzette Bosman <quzette@thenamib.com> Sent: Friday, May 22, 2026 3:47 PM To: esiahailb@udanam.com  Subject: Haib Copper Project - IAP Comment - Achill Island Investments [EXTERNAL EMAIL] Dear Project Team, 1	Attached herewith, please find comments from our Client for your consideration. Can you kindly please acknowledge receipt of the email? Sincerely, Quzette Bosman-Faul Social & Environmental Assessment Practitioner Geo Pollution Technologies (Pty) Ltd PO Box 11073 Windhoek, Namibia www.thenamib.com Tel: +264-61-257 411 Cell: +264-816 934822 Skype: quzette.bosman https://www.facebook.com/GPT.NAM No unauthorized copying, disclosure, conversion to hard copy, distribution or use of any part of this email is allowed. This email is confidential. Please notify the sender immediately and destroy this email and all attachments, should you have received this email in error. On 13/05/2026 12:10 pm, Kevin Liddle wrote: Hi Joe, Thanks for sending this document. It is certainly more informative than the meeting and provides a helpful summary on your perspective of water availability. I do think an information session would be helpful for the farming community. A few comments in the meantime: 1. Page 3: <i>If the water required for the Haib Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderkloof dams), the number of years with restrictions increased from 7 (without Haib Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small.</i> Is it reasonable to say that the impact is relatively small? The increase from 7 to 9 (out of 85 yrs) represents a 30% increase in risk. A failure in the system could mean that permanent crops (e.g. vines and date trees) will die. This will push farms into bankruptcy. It doesn't feel like a 30% increase in risk is small given the dire consequences of the event taking place. The severity of the event (restrictions) is not defined which also makes any assessment even more difficult. I understand the facts are based on Haib being dependent on releases from the Gariep and Vanderkloof and this is not what you are proposing but the principal of saying the impact is small is surely not correct. 2. I see your comment on cumulative effects in the Q&A but do we have a view on the accuracy of the demand figures you are using. How many other applications are in process for water rights in Namibia, South Africa, Botswana and Lesotho? Are they all part of the demand figures you are using? And of course do the countries have the rights to be granted. There have been a number of ESIA applications over the recent past which all required more water – have these rights been issued and taken into account? 2
3. Do we know how much water Namibia has actually been granted from Orasecom and how this lines up with actual water rights issued? Attached is 2018 report that says that water rights in Namibia have been issued totalling 65m cubes in Aussenkehr (aside from the 64m cubes that were being applied for as a part of the ESIA). There are obviously lots of users outside of Aussenkehr. We don't know the volume that Namibia has a right to allocate but we have seen numbers of between 50m and 70m. 4. Page 9: 1. Did you look at plotting observed flow at Blouputs for just 2015-2016? (i.e. the worst years on record) 2. How can we understand the minimum flow further? Is it based on actual water rights issued by all countries, actual usage, estimates, etc? Is it ever reconciled with actual flow levels? 5. I know it is not your map but do you know why Vlootsdrift is not on the map for question 10 (page 15)? 6. Instead of using Blouputs as the minimum flow gauging point why are you not using Vlootsdrift (DBH009) since it is much closer. This will have a much better reflection of reality as we believe the consumption between Blouputs and Noordewer can be substantially more than expected (especially in times of low flow and heat waves) Remember that it is perhaps 21 days of elapsed time from releasing water from the Vanderkloof to it arriving in Aussenkehr – i.e. releasing water when low flow is observed can still be very detrimental 7. Have you done a full analysis on optimising pumping capacity and dam size versus risk/cost/etc.? Of course, the off-site storage and pumping in peak is good for reducing risk. Anecdotal, banking on being able to extract for 121 days every year seems very aggressive and full of risk for all. 8. There is a reference to the Water Abstraction Management Protocol in the EMP. Can we please see this document? I recognise that we both have the sustainability of water supply as a common goal. As a new entrant I think it is obvious that there are major concerns (particularly since we are downstream) and we need to find a way to get somewhat comfortable that our business will not be unduly affected. One thing to note is should your project proceed I am sure you are going to be beating the drum on points such as 2 and 3 when new applications come in (and they will). Thanks Kevin Kevin Liddle Commercial Director  P.O. Box 765 Aussenkehr Namibia Mobile: +27 (0)83 575 7292 Tel: +264 (0) 63 297066/297359/297510 Fax: +264 (0) 63 297053 Email: kevin@silverlands.com 3	Website: www.silverponds.com From: esiahailb@udanam.com <esiahailb@udanam.com> Sent: 12 May 2026 12:38 To: fritz@easycoms.co.za; quzette@thenamib.com Cc: 'Joseph Mulders' <jmulders@knightiesold.com> Subject: Follow-Up on WRWD Focus Group Session - Q&A Addendum and Stakeholder Feedback Good Day Stakeholders, As a follow up to key queries asked in the focus group session on the 23rd April, please receive some clarity in the attached QnA Addendum to the WRWD study. We are still in the process of developing minutes of all meetings held and will distribute these but for the sake of preliminary feedback key queries have been included and clarity provided. This document will remain in draft form as we expect and welcome additional queries. I acknowledge that the WRWD study is complex so based off feedback we are looking to organise a Q and A session with regards to the water abstraction with the author of the WRWD study (Consultant appointed by DWS SA to develop Annual Operating Procedures)- please provide feedback if this will be helpful. Alternatively we will filter all queries through specialists we are working with. Thank you Joe Joseph (Joe) Mulders Senior Environmental Scientist Knight Piesold (Pty) Ltd. T: +27 11 806 7111 D: 0727542603 1 Discovery Place, The Ridge, Sandhurst Sandton Gauteng 2196 South Africa twitter linkedin facebook  ISO 9001:2015 Certificate No: 212061140/5 ISO 14001:2015 Certificate No: 170414034/2 ISO 45001:2018 Certificate No: 271012064/3 *This communication is confidential and subject to the legal disclaimer located at this link: Disclaimer. CAUTION - EXTERNAL SENDER - This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Be extra cautious if the sender appears to be a colleague or co-worker. Disclaimer The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful. This email has been scanned for viruses and malware, and may have been automatically archived by Mimecast, a leader in email security and cyber resilience. Mimecast integrates email defenses with brand protection, security awareness training, web security, compliance and other essential capabilities. 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Achill Island Investments (PTY) Ltd

22 May 2026

The Director
Environmental Commissioner
Ministry of Environment, Forestry and Tourism
Windhoek
Namibia

Dear Sir / Madam

Re: Comments on the Environmental Impact Assessment for the Proposed Water Abstraction, Supply and Storage Infrastructure by NamWater to Support the Haib Copper Mine near Noordoever, //Karas Region, Namibia (MEFT: APP-006/007)

Achill Island Investments Pty Ltd farms table grapes and dates in Aussenkehr. We farm 694 hectares of table grapes and 246 hectares of dates, making us the largest table grape and date producer (once our dates trees reach maturity) in Namibia. Once our investment reaches full bearing, we will produce approximately 11.25 million kilograms of grapes and 3 million kilograms of dates annually, the majority of which is exported, earning foreign currency for Namibia. At peak season we employ approximately 4,000 people in and around Aussenkehr.

Our farm — and many others in the Aussenkehr valley — is entirely and irreversibly dependent on a continuous and reliable supply of quality water from the Orange River. There is no alternative source. The photograph below was taken in December 2016, when the Orange River ran dry at Aussenkehr. It was resolved within a week due to a management intervention upstream, but it provides an enduring reminder that the Orange River is a finite resource and that any failure of supply, however brief, poses an existential threat to our operations, our employees, and the broader Aussenkehr farming community.



[Photograph: Orange River at Aussenkehr, December 2016]

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We have reviewed a document set exceeding 1,200 pages. We apologise for the brief delay in this submission; we request that the comment period be formally extended to allow adequate engagement with the revised documentation, including the WRWD addendum and the draft EMP, which were circulated late in the process.

Our Position

We are not opposed to the Haib Copper Mine or to the abstraction of water to support it. Namibia needs investment, and we recognise the economic significance of the project. However, we cannot support this application as it currently stands.

Our support is conditional on a Water Abstraction Management Protocol being finalised and agreed with downstream users — including ourselves — before any Environmental Clearance Certificate is granted. The Protocol is referenced in the draft EMP as the legally binding operational instrument governing when and how abstraction will occur. It has not been made available. Without it, we cannot assess whether our water security will be protected, and neither, we respectfully submit, can the Ministry.

The concerns set out below explain why this Protocol is essential and why the current application contains material deficiencies that must be addressed before approval.

1. Process: The Late Introduction of NamWater as Applicant

Our understanding of IFC Performance Standard 1 is that the responsibility for establishing and maintaining the ESIA process rests with the Applicant, who must ensure that Interested and Affected Parties have a genuine opportunity to engage. We have serious concerns on this front.

We were informed only on 23 April 2026 — after the substantive public participation had already taken place — that NamWater had replaced Koryx Copper as the applicant for the water abstraction licence. This is a material change. NamWater is the entity that will hold the licence and bear legal responsibility for compliance with permit conditions. We had no opportunity to scrutinise NamWater's capacity, track record, or governance arrangements before engaging with this process.

More significantly, the WRWD addendum (comment response #12) confirms that a Memorandum of Understanding between NamWater and Koryx Copper — governing the commercial and operational relationship between the licence holder and the mine — is 'currently under development.' As of the date of this submission, there is no signed agreement between these two entities. The Ministry cannot fully evaluate this ECC application when the fundamental contractual arrangements underpinning it do not yet exist.

We also note the following:

- NamWater, as Applicant, has not attended any of the public participation meetings. We have never had an opportunity to meet the entity that will hold this licence.
- On 12 May 2026, the Environmental Assessment Practitioner (EAP) offered a follow-up meeting with us on water security matters. We accepted on 13 May 2026. We have received no response since. This is a failure of the consultation process and should be noted as such in the record.

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2. The Water Abstraction Management Protocol Must Be Made Available

The draft EMP (Operational Phase, Table 4-2) states that NamWater will 'implement the Water Abstraction Management Protocol which guides periodic abstraction with explicit surplus-plus-flow thresholds and enforce strict compliance with established protocols.' This Protocol is described as the operative document that will determine, on a day-to-day basis, whether abstraction is permitted or must cease.

This document has not been shared with Interested and Affected Parties.

For a downstream farming operation that is wholly dependent on the Orange River, this Protocol is the single most important document in the entire ESIA package. It will translate the hydrological modelling into enforceable operational rules. Without it, the assurances given in the EIA and WRWD are theoretical. We cannot assess whether our interests are protected, and we cannot give meaningful comment on this application, until we have seen it.

We formally request that the draft Water Abstraction Management Protocol be released and that the comment period be extended to allow I&APs to respond to it.

3. Blouputs is the Wrong Gauging Point for the Abstraction Trigger

The ESIA proposes to use the Blouputs gauging station (DBH014) — located in South Africa, upstream of the Namibian border — as the primary trigger point for determining when river flow is in 'surplus' and abstraction may proceed. We question whether this gives adequate protection to downstream Namibian users.

Between Blouputs and the proposed abstraction point near Noordoever, there are existing Namibian water users — irrigation schemes, domestic supply, and existing industry — whose abstraction is not captured in the minimum flow values set annually by South Africa's Department of Water and Sanitation (DWS). In periods of low flow and sustained high temperatures, consumption in this stretch can be materially greater than modelled. This is not a theoretical risk; we have observed it.

The gauging station at Vioolsdrift Bridge (DBH009) is operational, closer to the abstraction point, and would provide a significantly more accurate reflection of flow conditions at the relevant location. We note that the draft EMP itself commits to installing flow monitors 'downstream in Noordoever' — an implicit acknowledgement that Blouputs alone is insufficient. We ask that this commitment be formalised: the Vioolsdrift Bridge gauge (DBH009), or a new gauge at Noordoever, should be designated as the primary operating trigger for abstraction decisions, and this should be a binding condition of any ECC.

4. The System is Already Under Stress — Recent Evidence Not Fully Reflected

The WRWD confirms that the Orange River Project is already slightly over-utilised at the 2024 development level, with restrictions required in 8.2% of the years analysed — above the expected 5% threshold for a balanced system. We accept that the proposed surplus-plus-flow-only pumping approach, combined with an off-channel storage dam, is designed to avoid exacerbating this position for downstream users. However, we have two specific concerns about the adequacy of the current analysis.

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First, the most recent DWS Annual Operating Analysis was completed in September 2025. The WRWD addendum notes that this report 'was expected to be released in March 2026 but is not yet available.' It has therefore not been incorporated into the ESIA. This is a material gap at a moment when the hydrological regime is actively changing.

Second — and more immediately — the WRWD addendum (Figure 1-1) shows that the Sendelingsdrift gauging station, which is located downstream of the proposed abstraction point, recorded flows falling short of the Environmental Water Requirement in both 2024 and 2025. These are the most current measurements available. They indicate that the existing minimum flow thresholds, as currently set at Blouputs, are already proving insufficient to prevent EWR shortfalls in the lower Orange River in recent years — before any abstraction for the Haib Mine has begun. This recent observed data is not adequately reflected in the conclusions of the ESIA.

We note that the Polihali Dam is expected to begin inundating this month (July 2026), commencing a transition that the WRWD itself predicts will increase system restriction frequency significantly by 2035. We are not suggesting this was unmodelled — the 2035 scenario is included in the WRWD. We are noting that the ECC decision is being made at precisely the moment this transition begins, and that the hydrological baseline is shifting under the process. Given this, we request that the September 2025 DWS operating analysis, once released, be incorporated into a revised assessment before any approval is granted.

5. Dam Break and Failure Consequence Analysis

The project proposes the construction of a 25 Mm³ off-channel storage dam upstream of Aussenkehr. This is a substantial impoundment. Its failure would pose a direct, severe, and potentially irreversible threat to our farm, our employees, and the downstream community. We have not been provided with any dam break or failure consequence analysis as part of this process. We regard this as a material omission and request that such an analysis be completed and shared with I&APs before any ECC is considered.

6. Water Rights Transparency

The minimum flow values set at Blouputs are intended to satisfy all downstream requirements — water users, irrigation, domestic supply, environmental water requirements, and losses. A critical input to this determination is the total volume of water rights issued in Namibia along the Lower Orange River and the extent to which those rights are currently being exercised.

We raised this in the public participation process (recorded as comment #13 in the WRWD addendum). The response acknowledged that the Namibian Ministry of Agriculture, Water and Land Reform does not release permit information to members of the public. We understand that policy. However, the consequence is that the ESIA modelling cannot capture the full gap between current actual usage and total entitled usage. Existing Namibian water right holders are entitled to increase their abstraction up to their licensed volumes at any time. If this occurs — particularly during low flow conditions — the minimum flow values at Blouputs may prove inadequate to protect all downstream users, independent of any Haib Mine abstraction.

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We request that the Ministry ensure this information is incorporated into the operational model before any ECC is granted.

Summary of Requests

We request the following before any Environmental Clearance Certificate is granted:

1. A formal extension of the public comment period to allow adequate engagement with the full ESIA documentation.
2. Full disclosure of the draft Water Abstraction Management Protocol, with a dedicated comment period thereon, and mutually agreed conditions before finalisation.
3. Designation of the Vloosdrift Bridge gauge (DBH009) or a gauge at Noordoewer as the operative abstraction trigger point, replacing Blouputs as the primary control point.
4. Incorporation of the September 2025 DWS Annual Operating Analysis and the 2024-2025 Sendelingsdrift EWR shortfall data into a revised hydrological assessment.
5. A dam break and failure consequence analysis for the proposed 25 Mm³ off-channel storage dam.
6. Disclosure and modelling of existing Namibian water rights and current utilisation along the Lower Orange River.
7. Execution and publication of the Memorandum of Understanding between NamWater and Koryx Copper, with an opportunity for comment.
8. A formal meeting with NamWater as the licence applicant.

We are committed to engaging constructively in this process and we support the economic development that the Haib Copper Mine represents for Namibia and the //Karas Region. We wish to see this project proceed — but only on terms that provide our operations, and those of other downstream water users, with legally enforceable and technically robust protection. A mutually agreed Water Abstraction Management Protocol, developed with proper I&AP engagement, is the foundation on which that confidence can be built.

Yours sincerely



Kevin Liddle

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esiahaib@udanam.com

From: Joseph Mulders <jmulders@knightpiesold.com>
Sent: Monday, 25 May 2026 11:37 am
To: Quzette Bosman
Cc:

Subject: RE Haib Copper Project - IAP Comment - Karsten

Good Morning Quzette,

Thank you kindly for sending the comments from your client they are well received. We will work through them and provide detailed responses in due course.

Based on comments received to date please note the following:

1. KP will be sending out invites to a dedicated QnA information session to discuss aspects of the Water Resources and Water Demand study. Dates are not yet set as we are currently in discussion with NamWater on this aspect and working on reviewing all comments received to ensure an effective session.
2. As requested, we have further extended the review period by 2 weeks to 9 June 2026. We trust this period since the 6th May will be sufficient for meaningful review.

Please note we are committed to allowing adequate opportunity for comments to ensure all concerns are considered and included in the application for ECC.

Thank you again.

Joe

Joseph (Joe) Mulders
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From: Quzette Bosman <quzette@thenamib.com>
Sent: Friday, May 22, 2026 3:11 PM
To: esiahaib@udanam.com
Cc:
and

1

Vermeulen <stefniefv@karsten.co.za>

Subject: Haib Copper Project - IAP Comment - Karsten

[EXTERNAL EMAIL]

Dear Project Team,

Attached herewith, please find comments from our Client for your consideration.

Can you kindly please acknowledge receipt of the email?

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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 KARSTEN NAMIBIA AGRICULTURE (PTY) LTD		21 May 2026	
To: Knight Regarding: Piesold (PTY)Ltd Haib Copper Project			
Stakeholder Comments on the Proposed Water Abstraction, Supply and Storage Infrastructure, Haib Draft Environmental Impact Assessment			
Herewith below are our comments for the above reference project. The overall general comment is that initial information release was confusing and the allocated time to review the volume of work insufficient, considering especially the technical nature of documents and volume of work			
Initial documents and link sent out on 06 May for review until 19 May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this web-page, there were two different EIAs related to the Copper Project. With a new application for the abstraction of water suddenly appearing without any prior indication in the BID, (that there would be such an application) Upon enquiry about the project (through an appointed representative), IAP's were informed that the page will be updated to make it clearer. This was evident on the 13th of May with two working days remaining in the officially communicated deadline. An extension of the deadline to 26 May was provided. However, the 25th is a public holiday and many operators and member will be travelling from the 22nd. This is, therefore insufficient time to consider the appendices of the EIA for comment as well. Only the EIA and EMP was reviewed (EMP comments on a separate page). It is assumed that the EIA will be a reasonable representation of the findings of the specialist report which would not be reviewed within the time-frame provided.			
Numbered Item	Issue		
1	Comment Initial documents sent out on 6th of May for review until the 19th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different EIAs related to the Copper Project. One of which was a new application for the abstraction of water appearing without any prior indication in the BID, that there would be such an application. Upon enquiry about the project, IAP's were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline). Comment i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example detailed minutes of the meeting held on 23 April 2026). iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Confirmed comments will follow regarding specialist reports.		
2	Comment Mention is made that the project will have to apply for an Abstraction License. Comment i) Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record. ii) Was a sand-mining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application). iii) Was a disposal license application submitted for sewage disposal? (Please provide proof of application).		
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Numbered Item	Issue		
9	Page 4. Mention if made in the draft EIA that the MOU between NamWater and the "Haib Copper Mine" is underway. Comment Please provide the draft MOU which forms the basis of why the ECC application can be done. Also provide the relevant sections of the Procurement Act of Namibia related to public notices in this MOU considering procurement of consulting services and works contractors (construction and operations).		
10	Page 4. Mention if made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made. Comment All IAPs are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.		
11	Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated. Comment A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.		
12	Diagram on page 13. Comment Includes abbreviations not included in the abbreviation list		
13	Figure on page 14. Comment Missing a legend.		
14	Page 16 mentions that "initial feedback" from the CA was provided. Comment Please provide the feedback as well as the data presented for the authority to base their feedback.		
15	Section 2.1 indicates specialists' studies conducted. Comment i) These do not correlate with the actual specialist studies conducted. For example: Air Quality and Archaeology. Also, preliminary glance of the social assessment seems to be a summary of Namibia Statistics Agency data and not a quantitative and qualitative assessment in terms of SIA requirements.		
16	Section 3.2 indicating listed activities. Comment No consideration regarding listed activities related to the bulk pipeline, resource extraction, disposal (wastewater treatment of sewage) or fuel storage.		
17	Table 3.2 mentions activity 5.1 rezoning. Reference is made in the applicability to "potential". Comment Why potentially? Please provide clarity on why this has not been determined. Was a town planning application initiated? If not provide written approval/exemption.		
18	There are two different tables with the same number 3.2 Table 3.2 mentions activity 8.6 rezoning. Construction of industrial and domestic wastewater treatment plants and related pipeline systems. Comment		
19	Document contains no details of such a system and or related discussion with MAFWLR related to the disposal permit and location of such a facility / facilities. Comment ii) No mention of the MAFWLR guidelines being used at the moment for Sand Mining in a river (for pipeline construction, dam wall content etc) or the Guidelines documents used for wastewater disposal.		
20	IPC mentioned as a Guideline in the table. Comment No relevant guidelines included to transparency and no implementation of the guidelines in terms of the EIA linked.		
21	The location alternatives are over properly earmarked for development. Comment What servitude with is required for this pipeline / power line road etc?		
22	Section includes a mention of the transmission line for power supply (Figure 4-6). Comment This figure does not include the power line.		
23	Figure 4.1 – As a flank wall in the figure and wing wall in the caption. Comment Is it a wing or flank wall? No description in the text of this structure, dimensions / material. What is it and how will it impact the morphology of the river - erosion and deposition pattern along the bank.		
24	Page 27 details the pipeline to be constructed. Comment The pipeline will have to rest on a particular substrate - softer sand? Where will this material be sourced and how licensed?		
25	Page 28 mentioned quarry material (for the dam wall) will be sourced from the first pit excavations. Comment Please provide EIA for Mining to consider the pit design and location and also the timing of the entire project. When will dam be built and when will they start mining?		
26	Page 28 mentions SANCOLD. Comment i) Not in the reference list not included in guidelines considered. ii) Are there no Namibian Requirements available and was this confirmed with MAFWLR? Namibian rivers are vastly different from South African rivers. Can not provide efficient comment since the reference can't be traced.		
27	Page 29 mentions the transmission line and road. Comment i) No details on the size of the transmission line, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc. ii) No details on the size of the road, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc.		
28	Section 4.4 First sentence. Material sources and quarries required for construction purposes (such as concrete batching or bedding for the pipeline) will be sourced from locations as not to contribute or minimise extent the total impact footprint of the Project. Comment		
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Numbered Item	Issue	Numbered Item	Issue
	"Will be sourced from location?" The entire sentence needs rewording to clarify the confused text and indicate where these locations will be".		Climate section extremely restricted and needs a full description to include: Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.
27	Content Section 4.5.2 states timing of water abstraction EIA and Mine EIA will be in parallel. Concern No details provided for temporary water requirements for construction and related storage etc. How will it be achieved.	35	Content Figure 6.1 Concern Directional pictures are advisable for visual descriptions.
28	Content Section 4.5.2 mentioned dam operations. Concern Who will be responsible when the storage dam become contaminated - who will be responsible for rehabilitation - since tailing will not be lined and dust could be toxic.	36	Content Section 6.4 Concern i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.
29	Content Section 4.5.2.3 mentions that groundwater inflows into the mine pit due to the low rainfall recharge and the low aquifer yield. Concern i) How can this statement be made without a groundwater assessment available for review and in the possible interconnection between the dam saturation level and seepage to the underground resources. No such information is part of this EIA.	37	Content Geology. Concern i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral silt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.
30	Content Project description. Concern It is important to know where the main polluting aspects will be located as these seem all to be upstream of the storage dam and can lead to significant pollution in the long term and after closure - it is imperative to understand the groundwater flow - dust from the tailing etc - so to consider the pollution risk and rehabilitation costs which NamWater will have to carry. Dust may for example have Thallium which bioaccumulates and is toxic - Thallium (Tl) is a highly toxic, heavy metal often found in copper ((Cu)) ores, where it acts as a significant environmental pollutant during smelting. Thallium is more poisonous than copper or mercury, causing severe neurological damage, hair loss, and potential death.	38	Content Soil Concern Soils of the various rivers not mentioned or explained / elaborated on. Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where the dam will be constructed? In the EMP a soil depth of 15cm is mentioned. Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Atlas of Namibia classifies the project area as having the dominant soil type of <i>Burns-Groene-Land-Septentrional-Burns</i> inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case.
31	Content Alternatives section descriptions. Concern The section is lacking in many aspects including technical alternatives related to the design of the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example - dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community development for over 35 years. Also, Alternative uses for the water include additional sustainable agricultural projects which have a much longer sustainability track-record etc vs the mine and 23 years. Note that current irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream.	39	Content Section 6.5 states the following: "Hab River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected trees". And "... protected species are dominant and the Hab River is a sensitive habitat...". Concern i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated. ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IPC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the
32	Content Section 5.2 mentions minutes of the meeting held on 26 April 2026. Concern Please provide a copy of the minutes for review.		
33	Content Section 5.4 indicates a review period of 7 working days. Concern Please revert to comment 1 regarding document review time and documents for review.		
34	Content Section 6.1. Concern		
29 PEARL STREET, WINDHOEK, NAMIBIA www.karsten.co.za PO BOX 17491, MARITIMUS, WINDHOEK, NAMIBIA DIRECTOR: P.J. Karskens (06) 0306477-015 VAT NO: 0306477-015 VIA NO: 0306477-015 TEL NO: +264 91 200 8300 RECEIVED: 01/02/2026 VAT NO: 0306477-015 VIA NO: 0306477-015 TEL NO: +264 91 200 8300 RECEIVED: 01/02/2026 VAT NO: 0306477-015 VIA NO: 0306477-015 TEL NO: +264 91 200 8300 World class fruit by world class people		29 PEARL STREET, WINDHOEK, NAMIBIA www.karsten.co.za PO BOX 17491, MARITIMUS, WINDHOEK, NAMIBIA DIRECTOR: P.J. Karskens (06) 0306477-015 VAT NO: 0306477-015 VIA NO: 0306477-015 TEL NO: +264 91 200 8300 RECEIVED: 01/02/2026 VAT NO: 0306477-015 VIA NO: 0306477-015 TEL NO: +264 91 200 8300 RECEIVED: 01/02/2026 VAT NO: 0306477-015 VIA NO: 0306477-015 TEL NO: +264 91 200 8300 World class fruit by world class people	
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Numbered Item	Issue	Numbered Item	Issue
	environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. ii) The proposed storage dam is located in a tributary of the Hab River, therefore according to the statement it should also be a sensitive special ecological area. iii) No off-sets have been mentioned in the environmental management plan for the modification of this 160 ha.	45	Content Page 65 mentioned EWR. Concern Please add to the abbreviation list.
40	Content On page 54 the report states the following: "The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint." Concern It is recorded here that 6 trees and shrubs are located in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint. 	46	Content On page 66 the report states: "Note the analysis above are ongoing as part of the study to assess the feasibility of the mine project." Concern We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.
41	Content Section 6.9.1 states: "River. The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the assurance of water supply to the existing users." Concern The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibia which sees the implementation of a new water act and numerous applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm³ not included in the consideration already between Bloemfontein and the abstraction point.	47	Content Section 6.10 Air Quality. Concern Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.
42	Content Page 61 indicated that ORASECOM has included some water requirements for the future Hab mine. Concern What amount was this?	48	Content Page 71 states: "the absence of strong winds". Concern No wind data was included in the report and preliminary view of the Air quality assessment indicates unreferenceable wind data of a short duration. Even so, the data (windspeeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).
43	Content Section 6.9.1.1 States: "River - If the water required for the Hab Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderloof dams), the number of years with restrictions increased from 7 (without Hab Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small." Concern Quantitatively small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.	49	Content Section 6.11. Concern i) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? iii) How many boreholes are in the zone of influence? iv) Please provide the zone of influence for the dam. v) Inconsistency related to the evaporation rates throughout the document. vi) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam infrastructure on the discussed local hydrogeological features.
44	Content Page 62 stated that abstraction is possible during high-flow periods. Concern The lower Orange River is regulated and dependent on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release	50	Content Section 6.12. Concern Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
		51	Content Section 7.1.3 States: "Although physical infrastructure will be developed, this will likely not restrict movement of local communities and wildlife movement across the terrain." Concern The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?
		52	Content Section 7.3.4. Concern i) How will the flank wall affect the drainage and river morphology?
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Numbered Item	Issue
53	a) Where will the sand required for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river? <u>Comment</u> Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur. <u>Concern</u> Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".
54	<u>Comment</u> Section 7.3.6. <u>Concern</u> i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Haib River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration, during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered. ii) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? iii) Decommissioning soil erosion impacts is stated to be the same as that of the construction phase. How is this possible after a dam is decommissioned?
55	<u>Comment</u> Section 7.3.7. <u>Concern</u> i) In the report the sensitivity of the washes is mentioned, however a major miss here is that rivers and washes are wildlife corridors to the Orange River - especially in this area. The alteration of the patterns and impact on a portion of possible critical habitat is not assessed. ii) Impacts on birds and especially endangered species not sufficiently described and assessed. It becomes especially important to note that the alternative powerline designs may also vary in impact significance. No assessment in this regard was conducted and even mentioned. In fact, a one liner here indicates a low significance - how was this determined? iii) A new habitat will be created with the construction of a dam - the impact was not mentioned or fully developed. iv) The sensitive habitat and determination of the critical habitat needs to be included in the impact rating to be properly quantified. v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned?
56	<u>Comment</u> Section 7.3.9. <u>Concern</u> i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected. iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.
57	<u>Comment</u> Section 7.3.9.2. <u>Concern</u> i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operations will have catastrophic results. ii) As mentioned before: Between Biospots and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to any abstraction during the operational phase.
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58	<u>Comment</u> Section 7.3.10. <u>Concern</u> Mitigation is not mentioned or explained and neither is the impact on the vegetation no included. For example - what is the expected dust settlement / fallout area for the dam wall construction and will this impact the sensitive Haib River vegetation as mentioned? - Not mentioned in Flora/Fauna either.
59	<u>Comment</u> Section 7.3.11. <u>Concern</u> i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.
60	<u>Comment</u> 7.3.12 Hydrogeology. <u>Concern</u> The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled.
61	<u>Comment</u> 7.3.13 Archaeology. <u>Concern</u> i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.
62	<u>Comment</u> Section 7.3.14. <u>Concern</u> i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. If the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailings facility - how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.
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esiahaib@udanam.com

From: Quzette Bosman <quzette@thenamib.com>
Sent: Thursday, 21 May 2026 4:04 pm
To: esiahaib@udanam.com
Subject: Re: Haib Copper Project - IAP Comment - NGGA

Flag Status: Flagged

Thank you very much.

I hope you also have a bit of a break next week.

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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On 21/05/2026 4:02 pm, esiahaib@udanam.com wrote:

Dear Quzette,

Thank you for sharing the client comments.

Receipt of the email and attached comments is hereby acknowledged. We will review the comments and revert accordingly.

Kind regards,

Heidri Bindemann-Nel
Environmental Practitioner
T: +264 61 240 309 | F: +264 61 240 309 | C: +264 61 651 7336
PO Box 20837, Windhoek, Namibia 9000 | Madiba's Corner, 45 Nelson Mandela Ave, Klein Windhoek
www.udanam.com



This e-mail is confidential and may also be privileged. If you are not the intended recipient, please notify us immediately.

1

From: Quzette Bosman <quzette@thenamib.com>
Sent: Thursday, 21 May 2026 3:54 pm
To: esiahaib@udanam.com
Cc: Joseph Mulders <jmulders@knightpietsood.com>; Namibian Grape Growers

Subject: Haib Copper Project - IAP Comment - NGGA

Dear Project Team,

Attached herewith, please find comments from our Client for your consideration.

Can you kindly please acknowledge receipt of the email?

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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To: Knight Piesold (Pty) Ltd
Regarding: Habo Copper Project

21 May 2026

**Stakeholder Comments on the Proposed Water Abstraction, Supply and Storage Infrastructure,
Habo Draft Environmental Impact Assessment and Draft Environmental Management Plan**

Dear Sir / Madam,

Herewith below are our comments for the above reference project. The overall general comment is that initial information release was confusing and the allocated time to review the volume of work insufficient, considering especially the technical nature of documents and volume of work.

Initial documents and link sent out on 06 May for review until 19 May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this web-page, there were two different ELAs related to the Copper Project. With a new application for the abstraction of water suddenly appearing without any prior indication in the BID, (that there would be such an application). Upon enquiry about the project (through an appointed representative), IAP's were informed that the page will be updated to make it clearer. This was evident on the 13th of May (with two working days remaining in the officially communicated deadline). An extension of the deadline to 26 May was provided. However, the 25th is a public holiday and many operators and member will be travelling from the 22nd. This is, therefore insufficient time to consider the appendices of the EIA for comment as well. Only the EIA and EMP was reviewed (EMP comments on a separate page). It is assumed that the EIA will be a reasonable representation of the findings of the specialist report which would not be reviewed within the timeframe provided.

Numbered Item	Issue
1	<i>Comment</i> Initial documents sent out on 6th of May for review until the 19th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different ELAs related to the Copper Project. One of which was a new application for the abstraction of water appearing without any prior indication in the BID, that there would be such an application. Upon enquiry about the project, IAP's were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline). <i>Concern</i> i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example detailed minutes of the meeting held on 23 April 2026).



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2	iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Continued comments will follow regarding specialist reports. <i>Comment</i> Mention is made that the project will have to apply for an Abstraction License. <i>Concern</i> i) Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record. ii) Was a sand mining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application). iii) Was a disposal license application submitted for sewage disposal? (Please provide proof of application). iv) A lot of emphasis is placed on the report in regards to the pumps to be used at the abstraction point, but almost no details regarding the dam and pipeline on the same level of detail provided.
3	<i>Comment</i> Other companies abstract directly from the Orange River for operations and apply as such for the abstraction. <i>Concern</i> Why is NamWater used for this application?
4	<i>Comment</i> Documents available on 07 May included two BID's. On the 13th of May these were replaced by a single Project BID. <i>Concern</i> i) There are two applications - Should the Project BID as well be used for the Water Abstraction EIA? ii) And what BID was used to register the project with MEPT? IAP's should have access to all documentation submitted to the Environmental Commissioner. Please provide the BID which was used for each individual application. iii) Was the Water Abstraction BID made available to IAPs during the initial notification of the project? iv) Procurement - Did NamWater follow the Procurement Act 15 of 2015 in securing consultation services for the ECC application? If so, kindly provide the documentation and motivation of successful bidder. If exempted from this requirement, please provide written proof thereof. v) Why are there no dates on the BIDs? vi) Existing BID (as available on 13 May 2026) refers to 87.5 Mpa to be extracted for 19 Years while the Water abstraction EIA refers to 40 Mpa. They mention the same total. How is this possible? (87.5M x 19 = 1662.5) (40M x 21 = 840). Neither of these two figures correlate with the scoping report. IAP's request to see the BID which was submitted for each application and the related screening notice received from MEPT related to that BID. Was MEPT made aware that a dam is planned, roughly the size of Orange Dam at around 70% capacity? (size of dam as page 3 of the EIA executive summary 25Mm³).
5	<i>Comment</i> In main EIA there will be a maximum of 3500 staff during construction and 1350 during operations. <i>Concern</i>



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Numbered Item	Issue
6	Will the employment be exclusively for the water infrastructure or for the mine as well? Who will keep the projects separate and how will accountability be managed. Clarity is required regarding this matter. <i>Comment</i> Working in the area as Namibian Consultants, such parties should respect the language and names adopted for their Heritage and Cultural Significance within Namibia. <i>Concern</i> All documents use variations in spelling of the region town names etc.
7	<i>Comment</i> Consideration was awarded to the authority's clarification questions as part of the stakeholder meeting, as well as the EIA and EMP report. <i>Concern</i> i) No mention about the dam, sand mining for the pipeline construction or the disposal licenses required for the wastewater treatment system (catering for 3500 employees during construction). ii) No mention of EIA required for fuel storage or related authorisation from the petroleum commissioner. iii) In the authorities meeting it was mentioned that a separate EIA will be conducted for the power line, yet the powerline was included in this project description. Clarity is required - how will the impact of the power line be considered and assessed. If with NamPower as a proponent, please provide bidding documentation for the ESI/EA process.
8	<i>Comment</i> Page 4. Mention if made in the draft EIA that the MOU between NamWater and the "Habo Copper Mine" is underway. <i>Concern</i> Please provide the draft MOU which forms the basis of why the ECC application can be done. Also provide the relevant sections of the Procurement Act of Namibia related to public entities in this MOU considering procurement of consulting services and works contractors (construction and operations).
9	<i>Comment</i> Page 4. Mention is made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made. <i>Concern</i> All IAP are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.
10	<i>Comment</i> Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated. <i>Concern</i> A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.
11	<i>Comment</i>



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12	Diagram on page 13. <i>Concern</i> Includes abbreviations not included in the abbreviation list. <i>Comment</i> Figure on page 14. <i>Concern</i> Missing a legend.
13	<i>Comment</i> Page 16 mentions that "initial feedback" from the CA was provided. <i>Concern</i> Please provide the feedback as well as the data presented for the authority to base their feedback.
14	<i>Comment</i> Section 2.1 indicates specialists' studies conducted. <i>Concern</i> i) These do not correlate with the actual specialist studies conducted. For example: Air Quality and Archaeology. Also, preliminary glance of the social assessment seems to be a summary of Namibia Statistics Agency data and not a quantitative and qualitative assessment in terms of SLA requirements.
15	<i>Comment</i> Section 3.2 indicating listed activities. <i>Concern</i> No consideration regarding listed activities related to the bulk pipeline, resource extraction, disposal (wastewater treatment of sewage) or fuel storage.
16	<i>Comment</i> Table 3.2 mentions activity 5.1 rezoning. Reference is made in the applicability to "potential". <i>Concern</i> Why potentially? Please provide clarity on why this has not been determined. Was a town planning application initiated? If not provide written of approval/exemption.
17	<i>Comment</i> There are two different tables with the same number 3.2 Table 3.2 mentions activity 3.6 rezoning Construction of industrial and domestic wastewater treatment plants and related pipeline systems. <i>Concern</i> i) Document contains no details of such a system and or related discussion with MAFWLR related to the disposal permit and location of such a facility. ii) No mention of the MAFWLR guidelines being used at the moment for Sand Mining in a river (for pipeline construction, dam wall cement etc) or the Guidelines documents used for wastewater disposal.
18	<i>Comment</i> IPC mentioned as a Guideline in the table. <i>Concern</i> No relevant guidelines included to transparency and no implementation of the guidelines in terms of the EIA linked.

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Numbered Item	Issue
19	<i>Content</i> The location alternatives are over properly earmarked for development. <i>Concerns</i> What servitude width is required for this pipeline / power line road etc?
20	<i>Content</i> Section includes a mention of the transmission line for power supply (Figure 4-6). <i>Concerns</i> This figure does not include the power line.
21	<i>Content</i> Figure 4.1 – As a flank wall in the figure and wing wall in the caption. <i>Concerns</i> Is it a wing or flank wall? No description in the text of this structure, dimensions / material. What is it and how will it impact the morphology of the river – erosion and deposition pattern along the bank.
22	<i>Content</i> Page 27 details the pipeline to be constructed. <i>Concerns</i> The pipeline will have to rest on a particular substrate – softer sand? Where will this material be sourced and how licensed?
23	<i>Content</i> Page 28 mentioned quarry material (for the dam wall) will be sourced from the first pit excavations. <i>Concerns</i> Please provide EIA for Mining to consider the pit design and location and also the timing of the entire project. When will dam be built and when will they start mining?
24	<i>Content</i> Page 28 mentions SANCOLD. <i>Concerns</i> i) Not in the reference list not included in guidelines considered. ii) Are there no Namibian Requirements available and was this confirmed with MAPWLR? Namibian rivers are vastly different from South African rivers. Can not provide efficient comment since the reference can't be traced.
25	<i>Content</i> Page 29 mentions the transmission line and road. <i>Concerns</i> i) No details on the size of the transmission line, the servitude required or the routing. EMP does not indicate alignment – no concrete delineation of sensitive area or topographical features etc. ii) No details on the size of the road, the servitude required or the routing. EMP does not indicate alignment – no concrete delineation of sensitive area or topographical features etc.
26	<i>Content</i> Section 4.4 First sentence: Material sources and quarries required for construction purposes (such as concrete batching or bedding for the pipeline) will be sourced from locations as not to contribute or minimise extent the total impact footprint of the Project. <i>Concerns</i>

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Numbered Item	Issue
27	<i>Content</i> “Will be sourced from locations” The entire sentence needs rewording to clarify the confused text and indicate where these locations will be”. <i>Content</i> Section 4.5.2 states timing of water abstraction EIA and Mine EIA will be in parallel. <i>Concerns</i> No details provided for temporary water requirements for construction and related storage etc. How will it be achieved.
28	<i>Content</i> Section 4.5.2 mentioned dam operations. <i>Concerns</i> Who will be responsible when the storage dam become contaminated - who will be responsible for rehabilitation - since tailing will not be lined and dust could be toxic.
29	<i>Content</i> Section 4.5.3.2.3 mentions that groundwater inflows into the mine pit due to the low rainfall recharge and the low aquifer yield. <i>Concerns</i> i) How can this statement be made without a groundwater assessment available for review and in the possible intersection between the dam saturation level and seepage to the underground resources. No such information is part of this EIA.
30	<i>Content</i> Project description. <i>Concerns</i> It is important to know where the main polluting aspects will be located as these seem all to be upstream of the storage dam and can lead to significant pollution in the long term and after closure - it is imperative to understand the groundwater flow - dust from the tailing etc. - as to consider the pollution risk and rehabilitation costs which NamWater will have to carry. Dust may for example have Thallium which bioaccumulates and is toxic - Thallium ((Tl)) is a highly toxic, heavy metal often found in copper ((Cu)) ores, where it acts as a significant environmental pollutant during smelting. Thallium is more poisonous than copper or mercury, causing severe neurological damage, hair loss, and potential death.
31	<i>Content</i> Alternatives section descriptions. <i>Concerns</i> The section is lacking in many aspects including technical alternatives related to the design of the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example - dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community development for over 35 years. Also, Alternative uses for the water include additional sustainable agricultural projects which have a much longer sustainability track-record etc v the mine and 23 years. Note that current irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream.

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32	<i>Content</i> Section 5.2 mentions minutes of the meeting held on 26 April 2026. <i>Concerns</i> Please provide a copy of the minutes for review.
33	<i>Content</i> Section 5.4 indicates a review period of 7 working days. <i>Concerns</i> Please revert to comment 1 regarding document review time and documents for review.
34	<i>Content</i> Section 6.1. <i>Concerns</i> Climate section extremely restricted and needs a full description to include: Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.
35	<i>Content</i> Figure 6.1. <i>Concerns</i> Directional pictures are advisable for visual descriptions.
36	<i>Content</i> Section 6.4 <i>Concerns</i> i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.
37	<i>Content</i> Geology <i>Concerns</i> i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral salt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.
38	<i>Content</i> Soil <i>Concerns</i>

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Numbered Item	Issue
	<i>Content</i> Soils of the various rivers not mentioned or explained / elaborated on. <i>Concerns</i> Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where the dam will be constructed? In the EMP a soil depth of 15cm is mentioned: Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Also of Namibia classify the project area as having the dominant soil type of <i>Eutric Skeletic Lithic Leptosol</i>. <i>Eutric</i> inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case.
39	<i>Content</i> Section 6.5 states the following: “Hab River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected tree”. And: “... protected species are dominant and the Hab River is a sensitive habitat...” <i>Concerns</i> i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated. ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IPC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. iii) The proposed storage dam is located in a tributary of the Hab River, therefore according to the statement it should also be a sensitive / special ecological area. iv) No off-sets have been even mentioned in the environmental management plan for the modification of this 160 ha.
40	<i>Content</i> On page 54 the report states the following: “The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint.” <i>Concerns</i> It is recorded here that 6 trees and shrubs are located in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint.

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Numbered Item	Issue
45	<i>Content</i> Page 62 mentioned EWR. <i>Concern</i> Please add to the abbreviation list.
46	<i>Content</i> On page 66 the report states: "Note the analysis above are ongoing as part of the studies to assess the feasibility of the mine project." <i>Concern</i> We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.
47	<i>Content</i> Section 6.10. Air Quality. <i>Concern</i> Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.
48	<i>Content</i> Page 71 states: "the absence of strong winds". <i>Concern</i> No wind data was included in the report and preliminary view of the Air quality assessment indicates unreferenced wind data of a short duration. Even so, the data (wind speeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).
49	<i>Content</i> Section 6.11. <i>Concern</i> a) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? iii) How many boreholes are in the zone of influence? iv) Please provide the zone of influence for the dam. v) Inconsistency related to the evaporation rates throughout the document. vi) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.
50	<i>Content</i> Section 6.12. <i>Concern</i> Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
51	<i>Content</i>

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Numbered Item	Issue
41	<i>Content</i> Section 6.9.1 states: "River. The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the assurance of water supply to the existing users." <i>Concern</i> The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibia which sees the implementation of a new water act and numerous applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm³ not included in the consideration already between Bloemfontein and the abstraction point.
42	<i>Content</i> Page 61 indicated that ORASECOM has included some water requirements for the future Hab mine. <i>Concern</i> What amount was this?
43	<i>Content</i> Section 6.9.1.1 States: "River. If the water required for the Hab Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vandenkloof dams), the number of years with restrictions increased from 7 (without Hab Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small." <i>Concern</i> Quantify small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.
44	<i>Content</i> Page 62 stated that abstraction is possible during high-flow periods. <i>Concern</i> The lower Orange River is regulated and dependent on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release requests be timed as not to impact on higher volume requirements at other times from farmers? Is there then a possibility that RSA will be continually requested to release water for "surplus" flow?

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49	<i>Content</i> Section 6.11. <i>Concern</i> a) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? iii) How many boreholes are in the zone of influence? iv) Please provide the zone of influence for the dam. v) Inconsistency related to the evaporation rates throughout the document. vi) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.
50	<i>Content</i> Section 6.12. <i>Concern</i> Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
51	<i>Content</i>

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Numbered Item	Issue
52	<i>Content</i> Section 7.3.3 States: "Although physical infrastructure will be developed, this will likely not restrict movement of local communities and wildlife movement across the terrain." <i>Concern</i> The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?
53	<i>Content</i> Section 7.3.4. <i>Concern</i> i) How will the flank wall affect the drainage and river morphology? ii) Where will the sand required for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river?
54	<i>Content</i> Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur. <i>Concern</i> Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".
55	<i>Content</i> Section 7.3.6. <i>Concern</i> i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Hab River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered. ii) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? iii) Decommissioning soil erosion impacts is stated to be the same as that of the construction phase. How is this possible after a dam is decommissioned?

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Numbered Item	Issue
	iii) A new habitat will be created with the construction of a dam – the impact was not mentioned or fully developed. iv) The sensitive habitat and determination of the critical habitat needs to be included in the impact rating to be properly quantified. v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned?
56	<u>Content</u> Section 7.3.9. <u>Concerns</u> i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected. iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.
57	<u>Content</u> Section 7.3.9.2. <u>Concerns</u> i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operation will have catastrophic results. ii) As mentioned before: Between Blompots and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to over abstraction during the operational phase.
58	<u>Content</u> Section 7.3.10. <u>Concerns</u> Mitigation is not mentioned or explained and neither is the impact on the vegetation no included. For example – what is the expected dust settlement / fallout area for the dam wall construction and will this impact the sensitive Haib River vegetation as mentioned? – Not mentioned in Flora/Fauna either.
59	<u>Content</u> Section 7.3.11. <u>Concerns</u> i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.
60	<u>Content</u> 7.3.12 Hydrogeology. <u>Concerns</u> The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the

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Numbered Item	Issue
61	exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled. <u>Content</u> 7.3.13 Archaeology. <u>Concerns</u> i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.
62	<u>Content</u> Section 7.3.14. <u>Concerns</u> i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. If the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailings facility – how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.
63	<u>Overall Questions:</u> i) Will the proponent request water to be released from SA, during multiple and consecutive years of drought? To ensure they can have surplus flow? And when will this be timed for? ii) Will the pumps be suitably scaled to allow for shorter abstraction period (in order to achieved the required volume) and was this consideration included anywhere as an alternative etc.

esiahaib@udanam.com

From: Quzette Bosman <quzette@thenamib.com>
Sent: Friday, 22 May 2026 9:09 am
To: esiahaib@udanam.com
Cc:

Subject: Re: Haib Copper Project - IAP Comment - ORVI
Attachments: 20 May 2026 Haib Comments 2.pdf

Flag Status: Flagged

Thank you for letting us know.

Can you open the attached?

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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On 21/05/2026 4:45 pm, esiahaib@udanam.com wrote:

Dear Quzette,

It seems that we are unable to open the ORVI IAP comments PDF you sent us.

Could you please check the file and resend it?

Kind regards,

Heldri Bindemann-Nel
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PO Box 20837, Windhoek, Namibia 9000 | Madiba's Corner, 45 Nelson Mandela Ave, Klein Windhoek
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1



This e-mail is confidential and may also be privileged. If you are not the intended recipient, please notify us immediately.

From: Quzette Bosman <quzette@thenamib.com>
Sent: Thursday, 21 May 2026 3:59 pm
To: esiahaib@udanam.com

Subject: Re: Haib Copper Project - IAP Comment - ORVI

Thank you very much.

I hope you also have a bit of a break next week.

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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On 21/05/2026 3:52 pm, esiahaib@udanam.com wrote:

Dear Quzette,

Thank you for sharing the client comments.

Receipt of the email and attached comments is hereby acknowledged.
We will review the comments and revert accordingly.

Kind regards,

Heldri Bindemann-Nel
Environmental Practitioner

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Urban Dynamics Arica (Pty) Ltd.
EIA Stakeholder Engagement Report:
NamWater EIA

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From: Quzette Bosman <quzette@thenamib.com>
Sent: Thursday, 21 May 2026 2:45 pm
To: esiah@udnam.com
Cc: Joseph Mulders <jmulders@knightpiessold.com>; Namibian Grape Growers

Dear Project Team,

Attached herewith, please find comments from our Client for your consideration.

Can you kindly please acknowledge receipt of the email?

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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20 May 2026

To: Knight Piessold (Pty) Ltd
Regarding: Half Copper Project

Stakeholder Comments on the Proposed Water Abstraction, Supply and Storage Infrastructure, Half Draft Environmental Impact Assessment and Draft Environmental Management Plan

Dear Sir / Madam,
Herewith below are our comments for the above reference project. The overall general comment is that initial information release was confusing and the allocated time to review the volume of work insufficient, considering especially the technical nature of documents and volume of work.

Initial documents and link sent out on 06 May for review until 19 May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this web-page, there were two different EIAs related to the Copper Project. With a new application for the abstraction of water suddenly appearing without any prior indication in the BID, (that there would be such an application). Upon enquiry about the project (through an appointed representative), IAP's were informed that the page will be updated to make it clearer. This was evident on the 13th of May (with two working days remaining in the officially communicated deadline). An extension of the deadline to 26 May was provided. However, the 25th is a public holiday and many operators and member will be travelling from the 22nd. This is, therefore insufficient time to consider the appendices of the EIA for comment as well. Only the EIA and EMP was reviewed (EMP comments on a separate page). It is assumed that the EIA will be a reasonable representation of the findings of the specialist report which would not be reviewed within the timeframe provided.

Numbered Item	Issue
1	Context Initial documents sent out on 6th of May for review until the 19th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different EIAs related to the Copper Project. One of which was a new application for the abstraction of water appearing without any prior indication in the BID, that there would be such an application. Concern Upon enquiry about the project, IAP's were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline). Concern i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example detailed minutes of the meeting held on 23 April 2026). iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Continued comments will follow regarding specialist reports.
2	Context Mention is made that the project will have to apply for an Abstraction License. Concern i) Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record.

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Numbered Item	Issue
	ii) Was a sandmining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application). iii) Was a disposal license application submitted for sewage disposal? (Please provide proof of application). iv) A lot of emphasis is placed on the report in regards to the pumps to be used at the abstraction point, but almost no details regarding the dam and pipeline on the same level of detail provided.
3	Context Other companies abstract directly from the Orange River for operations and apply as such for the abstraction. Concern Why is NamWater used for this application?
4	Context Documents available on 07 May included two BID's. On the 13th of May these were replaced by a single Project BID. Concern i) There are two applications - Should the Project BID now be used for the Water Abstraction EIA? ii) And what BID was used to register the project with MEFT? IAP's should have access to all documentation submitted to the Environmental Commissioner. Please provide the BID which was used for each individual application. iii) Was the Water Abstraction BID made available to IAPs during the initial notification of the project? iv) Procurement - Did NamWater follow the Procurement Act 15 of 2015 in securing consultation services for the ECC application? If so, kindly provide the documentation and motivation of successful bidder. If exempted from this requirement, please provide written proof thereof. v) Why are there no dates on the BIDs? vi) Existing BID (as available on 13 May 2026) refers to 87.5 Mtpa to be extracted for 19 years while the Water abstraction EIA refers to 40 Mtpa. They mention the same total. How is this possible? (87.5M x 19 = 1662.5) (40M x 23 = 920). Neither of these two figures correlate with the scoping report. IAP's request to see the BID which was submitted for each application and the related screening notice received from MEFT related to that BID. Was MEFT made aware that a dam is planned, roughly the size of Ononb Dam at around 70% capacity? (sizing of dam in page 3 of the EIA executive summary 25Mm³).
5	Context In main EIA there will be a maximum of 3500 staff during construction and 1350 during operations. Concern Will the employment be exclusively for the water infrastructure or for the mine as well? Who will keep the projects separate and how will accountability be managed. Clarity is required regarding this matter.
6	Context Working in the area as Namibian Consultants, such parties should respect the language and names adopted for their Heritage and Cultural Significance within Namibia. Concern All documents use variations in spelling of the region town names etc.
7	Context Consideration was awarded to the authority's clarification questions as part of the stakeholder meeting, as well as the EIA and EMP report. Concern i) No mention about the dam, sand mining for the pipeline construction or the disposal licenses required for the wastewater treatment system (catering for 3500 employees during construction).

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Numbered Item	Issue
	ii) No mention of EIA required for fuel storage or related authorisation from the petroleum commissioner. iii) In the authorities meeting it was mentioned that a separate EIA will be conducted for the power line, yet the powerline was included in this project description. Clarity is required - how will the impact of the power line be considered and assessed. If with NamPower as a proponent, please provide bidding documentation for the EIA process.
8	Context Page 4, Mention if made in the draft EIA that the MOU between NamWater and the "Half Copper Mine" is underway. Concern Please provide the draft MOU which forms the basis of why the ECC application can be done. Also provide the relevant sections of the Procurement Act of Namibia related to public entities in this MOU considering procurement of consulting services and works contractors (construction and operations).
9	Context Page 4, Mention is made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made. Concern All IAP are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.
10	Context Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated. Concern A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.
11	Context Diagram on page 13. Concern Includes abbreviations not included in the abbreviation list
12	Context Figure on page 14. Concern Missing a legend.
13	Context Page 16 mentions that "initial feedback" from the CA was provided. Concern Please provide the feedback as well as the data presented for the authority to base their feedback.
14	Context Section 2.1 indicates specialists' studies conducted. Concern i) These do not correlate with the actual specialist studies conducted. For example: Air Quality and Archaeology. Also, preliminary glance of the social assessment seems to be a summary of Namibia Statistics Agency data and not a quantitative and qualitative assessment in terms of SIA requirements.
15	Context Section 3.2 indicating listed activities. Concern No consideration regarding listed activities related to the bulk pipeline, resource extraction, disposal (wastewater treatment of sewage) or fuel storage.

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Numbered Item	Issue
16	Context Table 3.2 mentions activity 5.1 rezoning. Reference is made in the applicability to "potential". Concern Why potentially? Please provide clarity on why this has not been determined. Was a town planning application initiated? If not provide written of approval/ exemption.
17	Context There are two different tables with the same number:3.2 Table 3.2 mentions activity 8.6 rezoning. Construction of industrial and domestic wastewater treatment plants and related pipeline systems. Concern i) Document contains no details of such a system and or related discussion with MAFWLR related to the disposal permit and location of such a facility / facilities. ii) No mention of the MAFWLR guidelines being used at the moment for Sand Mining in a river (for pipeline construction, dam wall cement etc) or the Guidelines documents used for wastewater disposal.
18	Context IPC mentioned as a Guideline in the table. Concern No relevant guidelines included to transparency and no implementation of the guidelines in terms of the EIA linked.
19	Context The location alternatives are over property earmarked for development. Concern What servitude with is required for this pipeline / power line road etc?
20	Context Section includes a mention of the transmission line for power supply (Figure 4-6). Concern This figure does not include the power line.
21	Context Figure 4.1 - As a flank wall in the figure and wing wall in the caption. Concern Is it a wing or flank wall? No description in the text of this structure, dimensions/ material. What is it and how will it impact the morphology of the river - erosion and deposition patter along the bank.
22	Context Page 27 details the pipeline to be constructed. Concern The pipeline will have to rest on a particular substrate - softer sand? Where will this material be sourced and how licensed?
23	Context Page 28 mentioned quarry material (for the dam wall) will be sourced from the first pit excavations. Concern Please provide EIA for Mining to consider the pit design and location and also the timing of the entire project. When will dam be built and when will they start mining?
24	Context Page 28 mentions SANCOLD. Concern i) Not in the reference list not included in guidelines considered. ii) Are there no Namibian Requirements available and was this confirmed with MAFWLR? Namibian rivers are vastly different from South African rivers. Can not provide efficient comment since the reference can't be traced.

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Numbered Item	Issue
25	Context Page 29 mentions the transmission line and road. Concern i) No details on the size of the transmission line, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc. ii) No details on the size of the road, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc.
26	Context Section 4.4 First sentence: Material sources and quarries required for construction purposes (such as concrete batching or bedding for the pipeline) will be sourced from locations as not to contribute or minimise extent the total impact footprint of the Project. Concern "Will be sourced from locations?" The entire sentence needs rewording to clarify the confused text and indicate where these locations will be".
27	Context Section 4.5.2 states timing of water abstraction EIA and Mine EIA will be in parallel. Concern No details provided for temporary water requirements for construction and related storage etc. How will it be achieved.
28	Context Section 4.5.2 mentioned dam operations. Concern Who will be responsible when the storage dam become contaminated - who will be responsible for rehabilitation - since tailing will not be lined and dust could be toxic.
29	Context Section 4.5.3.2.3 mentions that groundwater inflows into the mine pit due to the low rainfall recharge and the low aquifer yield. Concern i) How can this statement be made without a groundwater assessment available for review and in the possible interconnection between the dam saturation level and seepage to the underground resources. No such information is part of this EIA.
30	Context Project description. Concern It is important to know where the main polluting aspects will be located as these seem all to be upstream of the storage dam and can lead to significant pollution in the long term and after closure - it is imperative to understand the groundwater flow - dust from the tailing etc - as to consider the pollution risk and rehabilitation costs which NamWater will have to carry. Dust may for example have Thallium which bioaccumulates and is toxic - Thallium (Tl) is a highly toxic, heavy metal often found in copper (Cu) ores, where it acts as a significant environmental pollutant during smelting. Thallium is more poisonous than copper or mercury, causing severe neurological damage, hair loss, and potential death.
31	Context Alternatives section descriptions. Concern The section is lacking in many aspects including technical alternatives related to the design of the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example - dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community

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Numbered Item	Issue
32	development for over 35 years. Also, Alternative uses for the water include addition sustainable agricultural projects which have a much longer sustainability track-record etc vs the mine and 23 years. Note that current irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream. Context Section 5.2 mentions minutes of the meeting held on 26 April 2026. Concern Please provide a copy of the minutes for review.
33	Context Section 5.4 indicates a review period of 7 working days. Concern Please revert to comment 1 regarding document review time and documents for review.
34	Context Section 6.1. Concern Climate section extremely restricted and needs a full description to include: Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.
35	Context Figure 6.1. Concern Directional pictures are advisable for visual descriptions.
36	Context Section 6.4 Concern i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.
37	Context Geology. Concern i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral silt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.
38	Context Soil Concern Soils of the various rivers not mentioned or explained / elaborated on. Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where

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Numbered Item	Issue
39	the dam will be constructed? In the EMP a soil depth of 15cm is mentioned. Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Atlas of Namibia classifies the project area as having the dominant soil type of <i>Euric Skeletic Lithic Leptosol</i> . <i>Euric</i> inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case. Context Section 6.5 states the following: "Haib River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected trees". And "...protected species are dominant and the Haib River is a sensitive habitat...". Concern i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated. ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IFC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. iii) The proposed storage dam is located in a tributary of the Haib River, therefore according to the statement it should also be a sensitive special ecological area. iv) No off-sets have been even mentioned in the environmental management plan for the modification of this 160 ha.
40	Context On page 54 the report states the following: "The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint." Concern It is recorded here that 6 trees and shrubs are located in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint. 
41	Context Section 6.9.1 states: "River: The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the assurance of water supply to the existing users." Concern The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibia which sees the implementation of a new water act and numerous

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Numbered Item	Issue
	applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm ³ not included in the consideration already between Blopouts and the abstraction point.
42	Context Page 61 indicated that ORASECOM has included some water requirements for the future Haib mine. Concern What amount was this?
43	Context Section 6.9.1.1 States: "River. • If the water required for the Haib Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderkloof dams), the number of years with restrictions increased from 7 (without Haib Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small." Concern Quantity small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.
44	Context Page 62 stated that abstraction is possible during high-flow periods. Concern The lower Orange River is regulated and dependant on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release requests be timed as not to impact on higher volume requirements at other times from farmers? Is there then a possibility that RSA will be continually requested to release water for "surplus" flow?
45	Context Page 62 mentioned EWR. Concern Please add to the abbreviation list.
46	Context On page 66 the report states: "Note the analysis above are ongoing as part of the studies to assess the feasibility of the mine project." Concern We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.
47	Context Section 6.10. Air Quality. Concern Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.
48	Context Page 71 states: "the absence of strong winds". Concern No wind data was included in the report and preliminary view of the Air quality assessment indicates unreferenced wind data of a short duration. Even so, the data (windspeeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).
49	Context Section 6.11. Concern i) Not all abbreviations included in list.

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Numbered Item	Issue
	i) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam?
	ii) How many boreholes are in the zone of influence?
	iii) Please provide the zone of influence for the dam.
	iv) Inconsistency related to the evaporation rates throughout the document.
	v) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.
50	Context Section 6.12. Concern Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
51	Context Section 7.3.3 States: "Although physical infrastructure will be developed, this will likely not restrict movement of local communities and wildlife movement across the terrain." Concern The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?
52	Context Section 7.3.4. Concern i) How will the flank wall affect the drainage and river morphology? ii) Where will the sand required for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river?
53	Context Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur. Concern Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".
54	Context Section 7.3.6. Concern i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Haib River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered. ii) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? iii) Decommissioning soil erosion impacts is stated to be the same as that of the construction phase. How is this possible after a dam is decommissioned?
55	Context Section 7.3.7. Concern

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	i) In the report the sensitivity of the washes is mentioned, however a major miss here is that rivers and washes are wildlife corridors to the Orange River - especially in this area. The alteration of the patterns and impact on a portion of possible critical habitat is not assessed.
	ii) Impacts on birds and especially endangered species not sufficiently described and assessed. It becomes especially important to note that the alternative powerline designs may also vary in impact significance. No assessment in this regard was conducted and even mentioned. In fact, a one liner here indicates a low significance - how was this determined?
	iii) A new habitat will be created with the construction of a dam - the impact was not mentioned or fully developed.
	iv) The sensitive habitat and determination of the critical habitat needs to be included in the impact rating to be properly quantified.
	v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned.
56	Context Section 7.3.9. Concern i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected. iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.
57	Context Section 7.3.9.2. Concern i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operations will have catastrophic results. ii) As mentioned before: Between Blopouts and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to over abstraction during the operational phase.
58	Context Section 7.3.10. Concern Mitigation is not mentioned or explained and neither is the impact on the vegetation not included. For example - what is the expected dust settlement / fallout area for the dam wall construction and will this impact the sensitive Haib River vegetation as mentioned? - Not mentioned in Flora/Fauna either.
59	Context Section 7.3.11. Concern i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.
60	Context 7.3.12 Hydrogeology. Concern The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled.

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61	Context 7.3.13 Archaeology. Concern i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.
62	Context Section 7.3.14. Concern i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. It the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailings facility - how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.
63	Overall Questions: i) Will the proponent request water to be released from SA, during multiple and consecutive years of drought? To ensure they can have surplus flow? And when will this be timed for? ii) Will the pumps be suitably scaled to allow for shorter abstraction period (in order to achieved the required volume) and was this consideration included anywhere as an alternative etc.

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Stakeholder Comments on the Proposed Water Abstraction, Supply and Storage Infrastructure, Draft Environmental Management Plan

Comments need to be considered along with the comments which was submitted for the Draft Environmental Assessment.

Numbered Item	Issue
1	Context Figure 1-1. Concern i) Please include a key / legend to the map.
2	Context Page 15 Permitting. Concern i) No mention of listed activities related to fuel storage (authorisation of MIME and MEFT), also no description of fuel to be used on site at construction camp etc. ii) No mention of blasting authorisations and requirements. Also not included in EIA description or proper assessment on possible impacts. iii) Consultation with regulatory air traffic authorities prior to the establishment of the power line will be advantageous.
3	Context Page 15 and 16. Concern i) A waste management plan should be drafted for the construction phase and should include construction waste generated, training, practical measures for remote waste handling. There will, for example, be a ton of cement bags etc. What will happen with sewage waste - how many people will build the dam wall? It will provide an indication of sewerage requirements - This should be included in the EIA EMP. ii) The EMP states "Prohibit the burning of waste material." Preliminary screening of the Aquatic assessment refers to the use of an incinerator. Nothing included in the EIA about this. Documents do not seem to speak to each other. Clarity to be provided on waste management, storage and handling to be provided.
4	Context Page 16, Material sources. Concern Include that the activity triggers resources extraction and that the construction activities requiring material for the pipeline and storage dam construction may only be taken from an appropriately licensed (ECZ and MAPWLR) area. MAPWLR issues sand mining licenses when sand is removed from rivers. This issue was not included in the EIA report either.
5	Context Page 16, Topography and drainage. Concern i) The aspects were not sufficiently addressed in the EIA and impacts and mitigation therefor also insufficient. ii) It is stated "Separate clean and dirty water and stabilise discharge points" How will clean and dirty drainage water be separated and what is defined as dirty water? No mention of these structures and it is assumed that this is part of the mining operations - which was not available for review yet. Pollution of the dam will have long term effects and responsibilities. How will NamWater manage the risk related to closure and or contamination?
6	Context Page 17, Hazardous Materials Management,

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Numbered Item Issue

	Concern It is stated: "Restrict the mixing of concrete and the cleaning of mixing equipment to lined or impermeable surfaces." Will this be done for the surface dam construction as well? How will this be enforced?
7	Context Page 17 Surface water - quality. Pollution and contamination of surface water and the surrounding environment. Concern i) It is stated: "Install and maintain silt fences and settlement ponds downstream of disturbed areas." Please clarify where will this be in the rivers and what are the dimensions since not included in the EIA. Is this in the Orange River as well? ii) Chemical storage MSDS should be included and referred to? Use of cement and related pollution risk - bags etc. Physical pollution of construction works, fuel storage restrictions (SANS and MIME) all not included. iii) Will a register of pollutants be kept? iv) What happens in the case of a flash flood etc (considering the recent climatic event which caused at lot of infrastructure damage in the region).
8	Context Page 18, Surface water - quantity. Reduction in surface water quantity. Concern i) Please share the strategy for the construction use as it is listed here - so stakeholders can review and plan as well - for all mitigation mentioned here. Please stage this in the construction phase since the timing of the construction phase for the surface water infrastructure components was not indicated in this report or the EMP. ii) No mention of how water will be abstracted for the construction phase will be achieved. Not in this EMP or the EIA.
9	Context Page 18 Contamination of groundwater resources. Concern i) What will happen with sewage - no description in the EIA or this report on where the sewage will go, over 3000 workers. Will there be chemical toilets remotely? Or septic tanks or French drains - if so, where are the boreholes located in the area to note that buffer zones etc? ii) How will possibly blasting affect boreholes / groundwater infrastructure and how will this be managed?
10	Context Page 19 Habitat loss, fauna injury and protected flora removal. Concern i) Include a map here indicating the sensitive areas referred to. If no map is available - include a provision to determine sensitive areas and to delineate these as part of the construction EMP. Ecological buffer zones should be included.
11	Context Page 20 Biodiversity - Avifauna. Concern Information related to the critically endangered bird species not adequately included in the EIA report with no visual representation of related habitats etc. Avoidance and mitigation measure should be based on such information. Also, construction activities not well defined in the EIA. Will there be blasting and excavations to construct the dam wall? Where and in what relation to the sensitive habitats are these. This is also very important considering the vegetation clearance associated with the servitudes of the power line, pipeline and road. Where are these in relation to the important bird species?

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Numbered Item	Issue
12	Context Page 21 Noise - No mitigations required. Concern i) Vibration / blasting and effects on the wildlife? Not considered. ii) Noise, vibration and blasting will have more bearing during the construction phase than the operational phase.
13	Context Page 21 Visual aesthetics management. Concern The dam will create an abrupt, unnatural vertical shift in the landscape's elevation. It will create a dramatic visual impact - Visual receptors now also refer to people using open-source satellite imagery. Even if there is little mitigation, the impact should be properly acknowledged and mitigation related to cleanliness, good housekeeping, and Health and Safety etc be considered.
14	Context Page 21 Heritage Resource Management. Concern Heritage is of national importance, map and buffer zones to be included in the EMP especially if located within the area to be flooded.
15	Context Page 22 Social and Economic Performance. Concern i) Complete aspects omitted in EIA and no mitigation therefore provided in the EMP. Please refer to comments of impact section and include related mitigation measures in EMP.
16	Context General Construction Phase comment. Concern Road and traffic, fire, vibration social (demographic profile, feelings and aspirations about the project, health and safety etc), economic, cumulative and planning aspects not included in the construction phase activities mitigation.
17	Context Page 22 Operational phase. Concern Electromagnetic fields of Power line not addressed in EIA or EMP.
18	Context Page 23 Topography. Concern i) When will the water be pumped into the dam, during construction or operation? The dam will continue to maintain an altered drainage. Details in EIA insufficient to consider aspects such as seepage etc. Questions to be answered include: rate of sedimentation of the dam, what will be the effect of the loosened material in river and wash during rainfall event. How will the completed pipeline in the river channel affect the drainage - How will this change erosion and deposition as aspects such as deepening the riverbed/ wash, narrowing the washes / channel, and eroding river banks?
19	Context Page 24 Reduced surface water availability. Concern Should seepage and groundwater recharge as well as evaporation losses not be addressed and possible mitigation considered, or at least discussed? Deep and narrow or division into smaller dams for reduced surface area? Wind abatement structures etc These are all alternatives not discussed in the EIA or the EMP. Design will affect operations.

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20	Context Page 24 Habitat loss, injuries or fatalities of terrestrial biodiversity. Concern Alternative line configuration and pole structures not included in EIA. No mention of the aftercare for various servitudes (power line, pipeline and road - no mention of these aspects in the EIA, therefore how assessed?). Where will these servitudes be? Alignment not included in EIA. Keeping in mind that a 18 m servitude is required for a 33 kV line (this info as stated by us since not in the report). Who will be responsible for the power line maintenance? NamWater or the Mine? NamPower? No clear communication or plans included.
21	Context Page 25 Biodiversity - aquatic ecosystems. Concern The dam will create an entire new ecosystem. This aspect needs to be included and how management of this ecosystem will be maintained.
22	Context Page 25 Land Use and Land Capability. Concern Land capability and the land use will have a definite change with the successful operations of the dam. Enhancement measures to be included as well as mitigation to safeguard changed potential in light of possible groundwater recharge etc.
23	Context Page 25 Visual - States no mitigation available. Concern There once was a valley, it changes with construction works, a dam wall being created, people and worker camps, machines. Then once done, water covers the valley area and creates a completely difference landscape. This to be added to the EIA. There are mitigation measures to be included: keeping a site clean and tidy, conducting regular maintenance of the pipeline and related infrastructure - continue with rehabilitation efforts in the servitude and where topsoil was placed.
24	Context General Comment Operational Phase EMP. Concern i) Groundwater and impacts thereon due to recharge of the dam not included. Yet in the monitoring report, requirements are made about boreholes monitoring. Why not assessed or included in the EIA/EMP? ii) In general, the monitoring component is not well linked to the EMP with the monitoring component including aspects not discussed in the EMP and EIA.

Date: 20.05.2026

General Manager: Jacques Koch

Signature:

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Urban Dynamics Arica (Pty) Ltd.
EIA Stakeholder Engagement Report:
NamWater EIA

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21 May 2026	
TO WHOM IT MAY CONCERN	
Regarding the proposed water abstraction, supply and storage infrastructure of the Haib draft Environmental Impact Assessment and draft Environment Management Plan we as stakeholders have the following comments and concerns.	
Draft Environmental Impact Assessment	
No. Item	Issue
1	<u>Context</u> Initial documents sent out on 6th of May for review until the 19th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different EIAs related to the Copper Project. One of which was a new application for the abstraction of water appearing without any prior indication in the BID, that there would be such an application. Upon enquiry about the project, IAP's were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline). <u>Concern</u> i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example detailed minutes of the meeting held on 23 April 2026). iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Continued comments will follow regarding specialist reports.
2	<u>Context</u> Mention is made that the project will have to apply for an Abstraction License. <u>Concern</u> i) Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record. ii) Was a sandmining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application). iii) Was a disposal license application submitted for sewage disposal? (Please provide proof of application).
1 Page	
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Draft Environmental Impact Assessment	
No. Item	Issue
	iv) A lot of emphasis is placed on the report regarding the pumps to be used at the abstraction point, but almost no details regarding the dam and pipeline on the same level of detail provided.
3	<u>Context</u> Other companies abstract directly from the Orange River for operations and apply as such for the abstraction. <u>Concern</u> Why is NamWater used for this application?
4	<u>Context</u> Documents available on 07 May included two BID's. On the 13th of May these were replaced by a single Project BID. <u>Concern</u> i) There are two applications - Should the Project BID now be used for the Water Abstraction EIA? ii) And what BID was used to register the project with MEFT? IAP's should have access to all documentation submitted to the Environmental Commissioner. Please provide the BID which was used for each individual application. iii) Was the Water Abstraction BID made available to IAPs during the initial notification of the project? iv) Procurement – Did NamWater follow the Procurement Act 15 of 2015 in securing consultation services for the ECC application? If so, kindly provide the documentation and motivation of successful bidder. If exempted from this requirement, please provide written proof thereof. v) Why are there no dates on the BID's? vi) Existing BID (as available on 13 May 2026) refers to 87.5 Mtpa to be extracted for 19 Years while the Water abstraction EIA refers to 40 Mtpa. They mention the same total. How is this possible? (87.5M x 19 = 1662.5) (40M x 23 = 920). Neither of these two figures correlate with the scoping report. IAP's request to see the BID which was submitted for each application and the related screening notice received from MEFT related to that BID. Was MEFT made aware that a dam is planned, roughly the size of Oanob Dam at around 70% capacity? (sizing of dam in page 3 of the EIA executive summary 23Mm³).
2 Page	
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5	<u>Context</u> In main EIA there will be a maximum of 3500 staff during construction and 1350 during operations. <u>Concern</u> Will the employment be exclusively for the water infrastructure or for the mine as well? Who will keep the projects separate and how will accountability be managed. Clarity is required regarding this matter.
6	<u>Context</u> Working in the area as Namibian Consultants, such parties should respect the language and names adopted for their Heritage and Cultural Significance within Namibia. <u>Concern</u> All documents use variations in spelling of the region town names etc.
7	<u>Context</u> Consideration was awarded to the authority's clarification questions as part of the stakeholder meeting, as well as the EIA and EMP report. <u>Concern</u> i) No mention about the dam, sand mining for the pipeline construction or the disposal licenses required for the wastewater treatment system (catering for 3500 employees during construction). ii) No mention of EIA required for fuel storage or related authorisation from the petroleum commissioner. iii) In the authorities meeting it was mentioned that a separate EIA will be conducted for the power line, yet the powerline was included in this project description. Clarity is required – how will the impact of the power line be considered and assessed. If with NamPower as a proponent, please provide bidding documentation for the ESIA process.
8	<u>Context</u> Page 4. Mention is made in the draft EIA that the MOU between NamWater and the "Haib Copper Mine" is underway. <u>Concern</u> Please provide the draft MOU which forms the basis of why the ECC application can be done.
3 Page	
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	Also provide the relevant sections of the Procurement Act of Namibia related to public entities in this MOU considering procurement of consulting services and works contractors (construction and operations).
9	<u>Context</u> Page 4. Mention if made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made. <u>Concern</u> All IAP are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.
10	<u>Context</u> Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated. <u>Concern</u> A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.
11	<u>Context</u> Diagram on page 13. <u>Concern</u> Includes abbreviations not included in the abbreviation list.
12	<u>Context</u> Figure on page 14. <u>Concern</u> Missing a legend.
13	<u>Context</u> Page 16 mentions that "initial feedback" from the CA was provided.
4 Page	
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	the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example – dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community development for over 35 years. Also, Alternative uses for the water include addition sustainable agricultural projects which have a much longer sustainability track-record etc vs the mine and 23 years. Note that current irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream.
32	<u>Context</u> Section 5.2 mentions minutes of the meeting held on 26 April 2026. <u>Concern</u> Please provide a copy of the minutes for review.
33	<u>Context</u> Section 5.4 indicates a review period of 7 working days. <u>Concern</u> Please revert to comment 1 regarding document review time and documents for review.
34	<u>Context</u> Section 6.1. <u>Concern</u> Climate section extremely restricted and needs a full description to include Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.
35	<u>Context</u> Figure 6.1. <u>Concern</u> Directional pictures are advisable for visual descriptions.

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36	<u>Context</u> Section 6.4 <u>Concern</u> i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.
37	<u>Context</u> Geology. <u>Concern</u> i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral silt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.
38	<u>Context</u> Soil. <u>Concern</u> Soils of the various rivers not mentioned or explained / elaborated on. Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where the dam will be constructed? In the EMP a soil depth of 15cm is mentioned. Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Atlas of Namibia classifies the project

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	area as having the dominant soil type of <i>Eutric Skeletic Lithic Leptosol</i> . <i>Eutric</i> inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case.
39	<u>Context</u> Section 6.5 states the following: "Haib River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected trees". And: "...protected species are dominant, and the Haib River is a sensitive habitat..." <u>Concern</u> i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated. ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IFC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. iii) The proposed storage dam is in a tributary of the Haib River, therefore according to the statement it should also be a sensitive /special ecological area. iv) No off-sets have been even mentioned in the environmental management plan for the modification of this 160 ha.
40	<u>Context</u> On page 54 the report states the following: "The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint." <u>Concern</u> It is recorded here that 6 trees and shrubs are in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint.

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41	<u>Context</u> Section 6.9.1 states: "River. The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the assurance of water supply to the existing users." <u>Concern</u> The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibian which sees the implementation of a new water act and numerous applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm³ not included in the consideration already between Blouputs and the abstraction point.
42	<u>Context</u> Page 61 indicated that ORASECOM has included some water requirements for the future Haib mine. <u>Concern</u> What amount was this?
43	<u>Context</u> Section 6.9.1.1 States: "...River. • If the water required for the Haib Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderkloof dams), the number of years with restrictions increased from 7 (without Haib Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the

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	assurance of supply to other users. This impact is however relatively small." <u>Concern</u> Quantify small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.
44	<u>Context</u> Page 62 stated that abstraction is possible during high-flow periods. <u>Concern</u> The lower Orange River is regulated and dependant on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release requests be timed as not to impact on higher volume requirements at other times from farmers? Is there then a possibility that RSA will be continually requested to release water for "surplus" flow?
45	<u>Context</u> Page 62 mentioned EWR. <u>Concern</u> Please add to the abbreviation list.
46	<u>Context</u> On page 66 the report states: "Note the analysis above are ongoing as part of the studies to assess the feasibility of the mine project." <u>Concern</u> We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.
47	<u>Context</u> Section 6.10. Air Quality. <u>Concern</u> Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.

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48	<u>Context</u> Page 71 states: "the absence of strong winds". <u>Concern</u> No wind data was included in the report and preliminary view of the Air quality assessment indicates unreference wind data of a short duration. Even so, the data (windspeeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).
49	<u>Context</u> Section 6.11. <u>Concern</u> i) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? iii) How many boreholes are in the zone of influence? iv) Please provide the zone of influence for the dam. v) Inconsistency related to the evaporation rates throughout the document. vi) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.
50	<u>Context</u> Section 6.12. <u>Concern</u> Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
51	<u>Context</u> Section 7.3.3 States: "Although physical infrastructure will be developed, this will likely not

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	restrict movement of local communities and wildlife movement across the terrain." <u>Concern</u> The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?
52	<u>Context</u> Section 7.3.4. <u>Concern</u> i) How will the flank wall affect the drainage and river morphology? ii) Where will the sand require for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river?
53	<u>Context</u> Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur. <u>Concern</u> Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".
54	<u>Context</u> Section 7.3.6. <u>Concern</u> i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Haib River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered. ii) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? iii) Decommissioning soil erosion impacts is stated to be the same as that of the construction

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	phase. How is this possible after a dam is decommissioned?
55	<u>Context</u> Section 7.3.7. <u>Concern</u> i) In the report the sensitivity of the washes is mentioned, however a major miss here is that rivers and washes are wildlife corridors to the Orange River - especially in this area. The alteration of the patterns and impact on a portion of possible critical habitat is not assessed. ii) Impacts on birds and especially endangered species not sufficiently described and assessed. It becomes especially important to note that the alternative powerline designs may also vary in impact significance. No assessment in this regard was conducted and even mentioned. In fact, a one liner here indicates a low significance - how was this determined? iii) A new habitat will be created with the construction of a dam - the impact was not mentioned or fully developed. iv) The sensitive habitat and determination of the critical habitat need to be included in the impact rating to be properly quantified. v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned.
56	<u>Context</u> Section 7.3.9. <u>Concern</u> i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected. iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.
57	<u>Context</u> Section 7.3.9.2. <u>Concern</u> i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operations will have catastrophic results.

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	ii) As mentioned before: Between Blouputs and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to over abstraction during the operational phase.
58	<u>Context</u> Section 7.3.10. <u>Concern</u> Mitigation is not mentioned or explained, and neither is the impact on the vegetation no included. For example – what is the expected dust settlement / fallout area for the dam wall construction, and will this impact the sensitive Haib River vegetation as mentioned? – Not mentioned in Flora/Fauna either.
59	<u>Context</u> Section 7.3.11. <u>Concern</u> i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.
60	<u>Context</u> 7.3.12 Hydrogeology. <u>Concern</u> The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled.

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61	<u>Context</u> 7.3.13 Archaeology. <u>Concern</u> i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.
62	<u>Context</u> Section 7.3.14. <u>Concern</u> i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. If the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailing's facility – how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce, and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.

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1	<u>Context</u> Figure 1-1. <u>Concern</u> i) Please include a key / legend to the map.
2	<u>Context</u> Page 15 Permitting.

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	<u>Concern</u> i) No mention of listed activities related to fuel storage (authorisation of MIME and MEFT), also no description of fuel to be used on site at construction camp etc. ii) No mention of blasting authorisations and requirements. Also not included in EIA description or proper assessment on possible impacts. iii) Consultation with regulatory air traffic authorities prior to the establishment of the power line will be advantageous.
3	<u>Context</u> Page 15 and 16. <u>Concern</u> i) A waste management plan should be drafted for the construction phase and should include construction waste generated, training, practical measures for remote waste handling. There will, for example, be a ton of cement bags etc. What will happen with sewage waste - how many people will build the dam wall? It will provide an indication of sewerage requirements – This should be included in the EIA/EMP. ii) The EMP states "Prohibit the burning of waste material." Preliminary screening of the Aquatic assessment refers to the use of an incinerator. Nothing included in the EIA about this. Documents do not seem to speak to each other. Clarity to be provided on waste management, storage and handling to be provided.
4	<u>Context</u> Page 16, Material sources. <u>Concern</u> Include that the activity triggers resources extraction and that the construction activities requiring material for the pipeline and storage dam construction may only be taken from an appropriately licensed (ECC and MAFWLR) area. MAFWLR issues sand mining licenses when sand is removed from rivers. This issue was not included in the EIA report either.
5	<u>Context</u> Page 16, Topography and drainage. <u>Concern</u> i) The aspects were not sufficiently addressed in the EIA and impacts and mitigation therefor

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	also insufficient. ii) It is stated: "Separate clean and dirty water and stabilise discharge points" How will clean and dirty drainage water be separated and what is defined as dirty water? No mention of these structures and it is assumed that this is part of the mining operations – which was not available for review yet. Pollution of the dam will have long term effects and responsibilities. How will NamWater manage the risk related to closure and or contamination?
6	<u>Context</u> Page 17, Hazardous Materials Management, <u>Concern</u> It is stated: "Restrict the mixing of concrete and the cleaning of mixing equipment to lined or impermeable surfaces." Will this be done for the surface dam construction as well? How will this be enforced?
7	<u>Context</u> Page 17 Surface water – quality. Pollution and contamination of surface water and the surrounding environment. <u>Concern</u> i) It is stated: "Install and maintain silt fences and settlement ponds downstream of disturbed areas." Please clarify where will this be in the rivers and what are the dimensions since not included in the EIA. Is this in the Orange River as well? ii) Chemical storage MSDS should be included and referred to? Use of cement and related pollution risk - bags etc. Physical pollution of construction works, fuel storage restrictions (SANS and MIME) all not included. iii) Will a register of pollutants be kept? iv) What happens in the case of a flash flood etc (considering the recent climatic event which caused a lot of infrastructure damage in the region).
8	<u>Context</u> Page 18, Surface water – quantity. Reduction in surface water quantity. <u>Concern</u> i) Please share the strategy for the construction use as it is listed here - so stakeholders can review and plan as well. - for all mitigation mentioned here. Please stage this in the

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How will the completed pipeline in the river channel affect the drainage - How will this change erosion and deposition as aspects such as deepening the riverbed/ wash, narrowing the washes / channel, and eroding riverbanks?</td></tr><tr><td>19</td><td><u>Context</u> Page 24 Reduced surface water availability. <u>Concern</u> Should seepage and groundwater recharge as well as evaporation losses no be addressed and possible mitigation considered, or at least discussed? Deep and narrow or division into smaller dams for reduced surface area? Wind abatement structures etc These are all alternatives not discussed in the EIA or the EMP. Design will affect operations.</td></tr><tr><td>20</td><td><u>Context</u> Page 24 Habitat loss, injuries or fatalities of terrestrial biodiversity. <u>Concern</u> Alternative line configuration and pole structures not included in EIA. No mention of the aftercare for various servitudes (power line, pipeline and road - no mention of these aspects in the EIA, therefore how assessed?). Where will these servitudes be? Alignment not included in EIA. Keeping in mind that an 18 m servitude is required for a 33 kV line (this info as stated by us since not in the report). Who will be responsible for the power line maintenance? NamWater or the Mine? NamPower? No clear communication or plans included.</td></tr></table> 23 Page Directors: Albert vd Merwe; Nico vd Merwe (Jnr)	Draft Environmental Management Plan		No. Item	Issue	17	<u>Context</u> Page 22 Operational phase. <u>Concern</u> Electromagnetic fields of Power line not addressed in EIA or EMP.	18	<u>Context</u> Page 23 Topography. <u>Concern</u> i) When will the water be pumped into the dam, during construction or operation? The dam will continue to maintain an altered drainage. 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No clear communication or plans included.	 +264 63 297 244 +264 63 297 496 admin@sonop.com.na www.sonop.com.na PO BOX 58, Noordoewer, Namibia, 23012 Reg Nr: 2019/03/5 VAT Nr: 10420168-015 <table><tr><th colspan="2">Draft Environmental Management Plan</th></tr><tr><th>No. Item</th><th>Issue</th></tr><tr><td>21</td><td><u>Context</u> Page 25 Biodiversity – aquatic ecosystems. <u>Concern</u> The dam will create an entire new ecosystem. This aspect needs to be included and how management of this ecosystem will be maintained.</td></tr><tr><td>22</td><td><u>Context</u> Page 25 Land Use and Land Capability. <u>Concern</u> Land capability and the land use will have a definite change with the successful operations of the dam. 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Urban Dynamics Arica (Pty) Ltd.
EIA Stakeholder Engagement Report:
NamWater EIA



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As stakeholders, we ask for input on these issues presented prior to the project's commencement.

Kind regards,



Sonop Farming (Pty) Ltd
CEO/Director: Albert Van der Merwe

Contact number: ☎ +264 81 209 1919



25 | Page

Directors: Albert van der Merwe, Nico van der Merwe [Inq]

esiahaib@udanam.com

From: Quzette Bosman <quzette@thenamib.com>
Sent: Thursday, 21 May 2026 2:39 pm
To: esiahaib@udanam.com
Cc:
Subject: Haib Copper Project - IAP Comment - Sonop
Attachments: Haib EMP EIP letter concerns 21 May 2026 signed Sonop.pdf
Flag Status: Flagged

Dear Project Team,

Attached herewith, please find comments from our Client for your consideration.

Can you kindly please acknowledge receipt of the email?

Sincerely,

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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esiahaib@udanam.com

From: Quzette Bosman <quzette@thenamib.com>
Sent: Monday, 8 June 2026 8:11 am
To:
Cc:
Subject: Re: Haib Copper Project - IAP Comment - Amanzi
Attachments: HAIB EMP EIP - Amanzi Trails.pdf

Dear Project Team,

Attached herewith, please find comments from our Client for your consideration.

Can you kindly please acknowledge receipt of the email?

Sincerely,

—

Quzette Bosman-Faul
Social & Environmental Assessment Practitioner

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21 May 2026

TO WHOM IT MAY CONCERN

Regarding the proposed water abstraction, supply and storage infrastructure of the Haib draft Environmental Impact Assessment and draft Environment Management Plan we as stakeholders have the following comments and concerns.

Draft Environmental Impact Assessment	
No. Item	Issue
1	Context Initial documents sent out on 6th of May for review until the 19th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different EIAs related to the Copper Project. One of which was a new application for the abstraction of water appearing without any prior indication in the BID, that there would be such an application. Upon enquiry about the project, IAP's were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline). Concern i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example detailed minutes of the meeting held on 23 April 2026). iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Continued comments will follow regarding specialist reports.
2	Context Mention is made that the project will have to apply for an Abstraction License. Concern i) Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record. ii) Was a sandmining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application).

Draft Environmental Impact Assessment	
No. Item	Issue
	iii) Was a disposal license application submitted for sewage disposal? (Please provide proof of application). iv) A lot of emphasis is placed on the report regarding the pumps to be used at the abstraction point, but almost no details regarding the dam and pipeline on the same level of detail provided.
3	Context Other companies abstract directly from the Orange River for operations and apply as such for the abstraction. Concern Why is NamWater used for this application?
4	Context Documents available on 07 May included two BID's. On the 13th of May these were replaced by a single Project BID. Concern i) There are two applications - Should the Project BID now be used for the Water Abstraction EIA? ii) And what BID was used to register the project with MEFT? IAP's should have access to all documentation submitted to the Environmental Commissioner. Please provide the BID which was used for each individual application. iii) Was the Water Abstraction BID made available to IAPs during the initial notification of the project? iv) Procurement - Did NamWater follow the Procurement Act 15 of 2015 in securing consultation services for the ECC application? If so, kindly provide the documentation and motivation of successful bidder. If exempted from this requirement, please provide written proof thereof. v) Why are there no dates on the BID's? vi) Existing BID (as available on 13 May 2026) refers to 87.5 Mtpa to be extracted for 19 Years while the Water abstraction EIA refers to 40 Mtpa. They mention the same total. How is this possible? (87.5M x 19 = 1662.5) (40M x 23 = 920). Neither of these two figures correlate with the scoping report. IAP's request to see the BID which was submitted for each application and the related screening notice received from MEFT related to that BID. Was MEFT made aware that a dam is planned, roughly the size of Oanob Dam at around 70% capacity? (sizing of dam in page 3 of the EIA executive summary 25Mm³).

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Draft Environmental Impact Assessment	
No. Item	Issue
5	Context In main EIA there will be a maximum of 3500 staff during construction and 1350 during operations. Concern Will the employment be exclusively for the water infrastructure or for the mine as well? Who will keep the projects separate and how will accountability be managed. Clarity is required regarding this matter.
6	Context Working in the area as Namibian Consultants, such parties should respect the language and names adopted for their Heritage and Cultural Significance within Namibia. Concern All documents use variations in spelling of the region town names etc.
7	Context Consideration was awarded to the authority's clarification questions as part of the stakeholder meeting, as well as the EIA and EMP report. Concern i) No mention about the dam, sand mining for the pipeline construction or the disposal licenses required for the wastewater treatment system (catering for 3500 employees during construction). ii) No mention of EIA required for fuel storage or related authorisation from the petroleum commissioner. iii) In the authorities meeting it was mentioned that a separate EIA will be conducted for the power line, yet the powerline was included in this project description. Clarity is required - how will the impact of the power line be considered and assessed. If with NamPower as a proponent, please provide bidding documentation for the ESIA process.
8	Context Page 4. Mention is made in the draft EIA that the MOU between NamWater and the "Haib Copper Mine" is underway.

Draft Environmental Impact Assessment	
No. Item	Issue
	Concern Please provide the draft MOU which forms the basis of why the ECC application can be done. Also provide the relevant sections of the Procurement Act of Namibia related to public entities in this MOU considering procurement of consulting services and works contractors (construction and operations).
9	Context Page 4. Mention if made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made. Concern All IAP are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.
10	Context Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated. Concern A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.
11	Context Diagram on page 13. Concern Includes abbreviations not included in the abbreviation list
12	Context Figure on page 14. Concern Missing a legend.
13	Context Page 16 mentions that "initial feedback" from the CA was provided.

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Draft Environmental Impact Assessment	
No. Item	Issue
	<i>Concern</i> Please provide the feedback as well as the data presented for the authority to base their feedback.
14	<i>Context</i> Section 2.1 indicates specialists' studies conducted. <i>Concern</i> i) These do not correlate with the actual specialist studies conducted. For example: Air Quality and Archaeology. Also, preliminary glance of the social assessment seems to be a summary of Namibia Statistics Agency data and not a quantitative and qualitative assessment in terms of SIA requirements.
15	<i>Context</i> Section 3.2 indicating listed activities. <i>Concern</i> No consideration regarding listed activities related to the bulk pipeline, resource extraction, disposal (wastewater treatment of sewage) or fuel storage.
16	<i>Context</i> Table 3.2 mentions activity 5.1 rezoning. Reference is made in the applicability to "potential". <i>Concern</i> Why potentially? Please provide clarity on why this has not been determined. Was a town planning application initiated? If not provide written of approval/ exemption.
17	<i>Context</i> There are two different tables with the same number: 3.2 Table 3.2 mentions activity 8.6 rezoning. Construction of industrial and domestic wastewater treatment plants and related pipeline systems. <i>Concern</i>

Draft Environmental Impact Assessment	
No. Item	Issue
	i) Document contains no details of such as system and or related discussion with MAFWLR related to the disposal permit and location of such a facility / facilities. ii) No mention of the MAFWLR guidelines being used now for Sand Mining in a river (for pipeline construction, dam wall cement etc) or the Guidelines documents used for wastewater disposal.
18	<i>Context</i> IFC mentioned as a Guideline in the table. <i>Concern</i> No relevant guidelines included to transparency and no implementation of the guidelines in terms of the EIA linked.
19	<i>Context</i> The location alternatives are over property earmarked for development. <i>Concern</i> What servitude with is required for this pipeline / power line road etc?
20	<i>Context</i> Section includes a mention of the transmission line for power supply (Figure 4-6). <i>Concern</i> This figure does not include the power line.
21	<i>Context</i> Figure 4.1 – As a flank wall in the figure and wing wall in the caption. <i>Concern</i> Is it a wing or flank wall? No description in the text of this structure, dimensions/ material. What is it and how will it impact the morphology of the river - erosion and deposition pattern along the bank.
22	<i>Context</i> Page 27 details the pipeline to be constructed. <i>Concern</i>

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Draft Environmental Impact Assessment	
No. Item	Issue
	The pipeline will have to rest on a particular substrate - softer sand? Where will this material be sourced and how licensed?
23	<i>Context</i> Page 28 mentioned quarry material (for the dam wall) will be sourced from the first pit excavations. <i>Concern</i> Please provide EIA for Mining to consider the pit design and location and the timing of the entire project. When will dam be built and when will they start mining?
24	<i>Context</i> Page 28 mentions SANCOLD. <i>Concern</i> i) Not in the reference list not included in guidelines considered. ii) Are there no Namibian Requirements available and was this confirmed with MAFWLR? Namibian rivers are vastly different from South African rivers. Can not provide efficient comment since the reference can't be traced.
25	<i>Context</i> Page 29 mentions the transmission line and road. <i>Concern</i> i) No details on the size of the transmission line, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc. ii) No details on the size of the road, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc.
26	<i>Context</i> Section 4.4 First sentence: Material sources and quarries required for construction purposes (such as concrete batching or bedding for the pipeline) will be sourced from locations as not to contribute or minimise extent the total impact footprint of the Project. <i>Concern</i>

Draft Environmental Impact Assessment	
No. Item	Issue
	"Will be sourced from locations?" The entire sentence needs rewording to clarify the confused text and indicate where these locations will be".
27	<i>Context</i> Section 4.5.2 states timing of water abstraction EIA and Mine EIA will be in parallel. <i>Concern</i> No details provided for temporary water requirements for construction and related storage etc. How will it be achieved.
28	<i>Context</i> Section 4.5.2 mentioned dam operations. <i>Concern</i> Who will be responsible when the storage dam becomes contaminated - who will be responsible for rehabilitation - since tailing will not be lined and dust could be toxic.
29	<i>Context</i> Section 4.5.3.2.3 mentions that groundwater inflows into the mine pit due to the low rainfall recharge and the low aquifer yield. <i>Concern</i> i) How can this statement be made without a groundwater assessment available for review and in the possible interconnection between the dam saturation level and seepage to the underground resources. No such information is part of this EIA.
30	<i>Context</i> Project description. <i>Concern</i> It is important to know where the main polluting aspects will be located as these seem all to be upstream of the storage dam and can lead to significant pollution in the long term and after closure - it is imperative to understand the groundwater flow - dust from the tailing etc - as to consider the pollution risk and rehabilitation costs which NamWater will have to carry. Dust may for example have Thallium which bioaccumulates and is toxic - Thallium (Tl) is a highly toxic, heavy metal often found in copper (Cu) ores, where it acts as a significant environmental pollutant during smelting. Thallium is more poisonous than copper or mercury, causing severe neurological damage, hair loss, and potential death.

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No. Item	Issue
31	Context Alternatives section descriptions. Concern The section is lacking in many aspects including technical alternatives related to the design of the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example – dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community development for over 35 years. Also, Alternative uses for the water include addition sustainable agricultural projects which have a much longer sustainability track-record etc vs the mine and 23 years. Note that current irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream.
32	Context Section 5.2 mentions minutes of the meeting held on 26 April 2026. Concern Please provide a copy of the minutes for review.
33	Context Section 5.4 indicates a review period of 7 working days. Concern Please revert to comment 1 regarding document review time and documents for review.
34	Context Section 6.1. Concern Climate section extremely restricted and needs a full description to include Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.
35	Context

Draft Environmental Impact Assessment	
No. Item	Issue
	Figure 6.1. Concern Directional pictures are advisable for visual descriptions.
36	Context Section 6.4 Concern i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.
37	Context Geology. Concern i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral silt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.
38	Context Soil. Concern Soils of the various rivers not mentioned or explained / elaborated on.

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Draft Environmental Impact Assessment	
No. Item	Issue
	Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where the dam will be constructed? In the EHP a soil depth of 15cm is mentioned. Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Atlas of Namibia classifies the project area as having the dominant soil type of <i>Eutric Skeletic Lithic Leptosol</i>. <i>Eutric</i> inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case.
39	Context Section 6.5 states the following: "Haib River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected trees". And: "...protected species are dominant, and the Haib River is a sensitive habitat..." Concern i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated. ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IFC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. iii) The proposed storage dam is in a tributary of the Haib River, therefore according to the statement it should also be a sensitive /special ecological area. iv) No off-sets have been even mentioned in the environmental management plan for the modification of this 160 ha.
40	Context On page 54 the report states the following: "The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint."

Draft Environmental Impact Assessment	
No. Item	Issue
	Concern It is recorded here that 6 trees and shrubs are in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint. 
41	Context Section 6.9.1 states: "River. The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the assurance of water supply to the existing users." Concern The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibian which sees the implementation of a new water act and numerous applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm³ not included in the consideration already between Blouputs and the abstraction point.
42	Context Page 61 indicated that ORASECOM has included some water requirements for the future Haib mine. Concern What amount was this?
43	Context

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Draft Environmental Impact Assessment	
No. item	Issue
	Section 6.9.1.1 States: "River. • If the water required for the Haib Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderkloof dams), the number of years with restrictions increased from 7 (without Haib Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small." <i>Concern</i> Quantify small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.
44	<i>Context</i> Page 62 stated that abstraction is possible during high-flow periods. <i>Concern</i> The lower Orange River is regulated and dependant on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release requests be timed as not to impact on higher volume requirements at other times from farmers? Is there then a possibility that RSA will be continually requested to release water for "surplus" flow?
45	<i>Context</i> Page 62 mentioned EWR. <i>Concern</i> Please add to the abbreviation list.
46	<i>Context</i> On page 66 the report states: "Note the analysis above are ongoing as part of the studies to assess the feasibility of the mine project." <i>Concern</i> We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.
47	<i>Context</i> Section 6.10. Air Quality.

Draft Environmental Impact Assessment	
No. item	Issue
	<i>Concern</i> Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.
48	<i>Context</i> Page 71 states: "the absence of strong winds". <i>Concern</i> No wind data was included in the report and preliminary view of the Air quality assessment indicates unreference wind data of a short duration. Even so, the data (windspeeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).
49	<i>Context</i> Section 6.11. <i>Concern</i> i) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? iii) How many boreholes are in the zone of influence? iii) Please provide the zone of influence for the dam. iv) Inconsistency related to the evaporation rates throughout the document. v) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.
50	<i>Context</i> Section 6.12. <i>Concern</i>

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Draft Environmental Impact Assessment	
No. item	Issue
	Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
51	<i>Context</i> Section 7.3.3 States: "Although physical infrastructure will be developed, this will likely not restrict movement of local communities and wildlife movement across the terrain." <i>Concern</i> The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?
52	<i>Context</i> Section 7.3.4. <i>Concern</i> i) How will the flank wall affect the drainage and river morphology? ii) Where will the sand require for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river?
53	<i>Context</i> Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur. <i>Concern</i> Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".
54	<i>Context</i> Section 7.3.6. <i>Concern</i> i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Haib River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered.

Draft Environmental Impact Assessment	
No. item	Issue
	i) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? ii) Decommissioning soil erosion impacts is stated to be the same as that of the construction phase. How is this possible after a dam is decommissioned?
55	<i>Context</i> Section 7.3.7. <i>Concern</i> i) In the report the sensitivity of the washes is mentioned, however a major miss here is that rivers and washes are wildlife corridors to the Orange River - especially in this area. The alteration of the patterns and impact on a portion of possible critical habitat is not assessed. ii) Impacts on birds and especially endangered species not sufficiently described and assessed. It becomes especially important to note that the alternative powerline designs may also vary in impact significance. No assessment in this regard was conducted and even mentioned. In fact, a one liner here indicates a low significance - how was this determined? iii) A new habitat will be created with the construction of a dam - the impact was not mentioned or fully developed. iv) The sensitive habitat and determination of the critical habitat need to be included in the impact rating to be properly quantified. v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned.
56	<i>Context</i> Section 7.3.9. <i>Concern</i> i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected, iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.

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Draft Environmental Impact Assessment	
No. Item	Issue
57	<i>Context</i> Section 7.3.9.2. <i>Concern</i> i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operations will have catastrophic results. ii) As mentioned before: Between Blouputs and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to over abstraction during the operational phase.
58	<i>Context</i> Section 7.3.10. <i>Concern</i> Mitigation is not mentioned or explained, and neither is the impact on the vegetation no included. For example - what is the expected dust settlement / fallout area for the dam wall construction, and will this impact the sensitive Haib River vegetation as mentioned? - Not mentioned in Flora/Fauna either.
59	<i>Context</i> Section 7.3.11. <i>Concern</i> i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.
60	<i>Context</i> 7.3.12 Hydrogeology. <i>Concern</i> The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this

Draft Environmental Impact Assessment	
No. Item	Issue
	impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled.
61	<i>Context</i> 7.3.13 Archaeology. <i>Concern</i> i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.
62	<i>Context</i> Section 7.3.14. <i>Concern</i> i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. It the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailing's facility - how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce, and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.

Draft Environmental Management Plan	
No. Item	Issue
1	<i>Context</i> Figure 1-1. <i>Concern</i> i) Please include a key / legend to the map.

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Draft Environmental Management Plan	
No. Item	Issue
2	<i>Context</i> Page 15 Permitting. <i>Concern</i> i) No mention of listed activities related to fuel storage (authorisation of MIME and MEFT), also no description of fuel to be used on site at construction camp etc. ii) No mention of blasting authorisations and requirements. Also not included in EIA description or proper assessment on possible impacts. iii) Consultation with regulatory air traffic authorities prior to the establishment of the power line will be advantageous.
3	<i>Context</i> Page 15 and 16. <i>Concern</i> i) A waste management plan should be drafted for the construction phase and should include construction waste generated, training, practical measures for remote waste handling. There will, for example, be a ton of cement bags etc. What will happen with sewage waste - how many people will build the dam wall? It will provide an indication of sewerage requirements - This should be included in the EIA /EMP. ii) The EMP states "Prohibit the burning of waste material." Preliminary screening of the Aquatic assessment refers to the use of an incinerator. Nothing included in the EIA about this. Documents do not seem to speak to each other. Clarity to be provided on waste management, storage and handling to be provided.
4	<i>Context</i> Page 16, Material sources. <i>Concern</i> Include that the activity triggers resources extraction and that the construction activities requiring material for the pipeline and storage dam construction may only be taken from an appropriately licensed (ECC and MAFWLR) area. MAFWLR issues sand mining licenses when sand is removed from rivers. This issue was not included in the EIA report either.
5	<i>Context</i>

Draft Environmental Management Plan	
No. Item	Issue
	Page 16, Topography and drainage. <i>Concern</i> i) The aspects were not sufficiently addressed in the EIA and impacts and mitigation thereof also insufficient. ii) It is stated: "Separate clean and dirty water and stabilise discharge points" How will clean and dirty drainage water be separated and what is defined as dirty water? No mention of these structures and it is assumed that this is part of the mining operations - which was not available for review yet. Pollution of the dam will have long term effects and responsibilities. How will NamWater manage the risk related to closure and or contamination?
6	<i>Context</i> Page 17, Hazardous Materials Management, <i>Concern</i> It is stated: "Restrict the mixing of concrete and the cleaning of mixing equipment to lined or impermeable surfaces." Will this be done for the surface dam construction as well? How will this be enforced?
7	<i>Context</i> Page 17 Surface water - quality. Pollution and contamination of surface water and the surrounding environment. <i>Concern</i> i) It is stated: "Install and maintain silt fences and settlement ponds downstream of disturbed areas." Please clarify where will this be in the rivers and what are the dimensions since not included in the EIA. Is this in the Orange River as well? ii) Chemical storage MSDS should be included and referred to? Use of cement and related pollution risk - bags etc, Physical pollution of construction works, fuel storage restrictions (SANS and MIME) all not included. iii) Will a register of pollutants be kept? iv) What happens in the case of a flash flood etc (considering the recent climatic event which caused a lot of infrastructure damage in the region).
8	<i>Context</i> Page 18, Surface water - quantity. Reduction in surface water quantity. <i>Concern</i>

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Draft Environmental Management Plan	
No. Item	Issue
	i) Please share the strategy for the construction use as it is listed here - so stakeholders can review and plan as well. - for all mitigation mentioned here. Please stage this in the construction phase since the timing of the construction phase for the surface water infrastructure components was not indicated in this report or the EMP. ii) No mention of how water will be abstracted for the construction phase will be achieved. Not in this EMP or the EIA.
9	Context Page 18 Contamination of groundwater resources. Concern i) What will happen with sewage - no description in the EIA or this report on where the sewage will go, of over 3000 workers. Will there be chemical toilets remotely? Or septic tanks or French drains - if so, where are the boreholes located in the area to note that buffer zones etc? ii) How will possibly blasting affect boreholes / groundwater infrastructure and how will this be managed?
10	Context Page 19 Habitat loss, fauna injury and protected flora removal. Concern i) Include a map here indicating the sensitive areas referred to. If no map is available - include a provision to determine sensitive areas and to delineate these as part of the construction EMP. Ecological buffer zones should be included.
11	Context Page 20 Biodiversity - Avifauna. Concern Information related to the critically endangered bird species not adequately included in the EIA report with no visual representation of related habitats etc. Avoidance and mitigation measure should be based on such information. Also, construction activities not well defined in the EIA. Will there be blasting and excavations to construct the dam wall? Where and in what relation to the sensitive habitats are these. This is also very important considering the vegetation clearance associated with the servitudes of the power line, pipeline and road. Where are these in relation to the important bird species?

Draft Environmental Management Plan	
No. Item	Issue
12	Context Page 21 Noise - No mitigations required. Concern i) Vibration / blasting and effects on the wildlife? Not considered. ii) Noise, vibration and blasting will have more bearing during the construction phase than the operational phase.
13	Context Page 21 Visual aesthetics management. Concern The dam will create an abrupt, unnatural vertical shift in the landscape's elevation. It will create a dramatic visual impact - Visual receptors now also refer to people using open-source satellite imagery. Even if there is little mitigation, the impact should be properly acknowledged, and mitigation related to cleanliness, good housekeeping, and Health and Safety etc be considered.
14	Context Page 21 Heritage Resource Management. Concern Heritage is of national importance, map and buffer zones to be included in the EMP especially if located within the area to be flooded.
15	Context Page 22 Social and Economic Performance. Concern i) Complete aspects omitted in EIA and no mitigation therefore provided in the EMP. Please refer to comments of impact section and include related mitigation measures in EMP.
16	Context General Construction Phase comment. Concern Road and traffic, fire, social vibration (demographic profile, feelings and aspirations about the project, health and safety etc.), economic, cumulative and planning aspects not included in the construction phase activities mitigation.

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Draft Environmental Management Plan	
No. Item	Issue
17	Context Page 22 Operational phase. Concern Electromagnetic fields of Power line not addressed in EIA or EMP.
18	Context Page 23 Topography. Concern i) When will the water be pumped into the dam, during construction or operation? The dam will continue to maintain an altered drainage. Details in EIA insufficient to consider aspects such as seepage etc. Questions to be answered include rate of sedimentation of the dam, what will be the effect of the loosened material in river and wash during rainfall event. How will the completed pipeline in the river channel affect the drainage - How will this change erosion and deposition as aspects such as deepening the riverbed/ wash, narrowing the washes / channel, and eroding riverbanks?
19	Context Page 24 Reduced surface water availability. Concern Should seepage and groundwater recharge as well as evaporation losses no be addressed and possible mitigation considered, or at least discussed? Deep and narrow or division into smaller dams for reduced surface area? Wind abatement structures etc These are all alternatives not discussed in the EIA or the EMP. Design will affect operations.
20	Context Page 24 Habitat loss, injuries or fatalities of terrestrial biodiversity. Concern Alternative line configuration and pole structures not included in EIA. No mention of the aftercare for various servitudes (power line, pipeline and road - no mention of these aspects in the EIA, therefore how assessed?). Where will these servitudes be? Alignment not included in EIA. Keeping in mind that an 18 m servitude is required for a 33 kV line (this info as stated by us since not in the report). Who will be responsible for the power line

Draft Environmental Management Plan	
No. Item	Issue
	maintenance? NamWater or the Mine? NamPower? No clear communication or plans included.
21	Context Page 25 Biodiversity - aquatic ecosystems. Concern The dam will create an entire new ecosystem. This aspect needs to be included and how management of this ecosystem will be maintained.
22	Context Page 25 Land Use and Land Capability. Concern Land capability and the land use will have a definite change with the successful operations of the dam. Enhancement measures to be included as well as mitigation to safeguard changed potential considering possible groundwater recharge etc.
23	Context Page 25 Visual - States no mitigation available. Concern There once was a valley, it changes with construction works, a dam wall being created, people and worker camps, machines. Then once done, water covers the valley area and creates a completely different landscape. This to be added to the EIA. There are mitigation measures to be included: keeping a site clean and tidy, conducting regular maintenance of the pipeline and related infrastructure - continue with rehabilitation efforts in the servitude and where topsoil was placed.
24	Context General Comment Operational Phase EMP. Concern i) Groundwater and impacts thereon due to recharge of the dam not included. Yet in the monitoring report, requirements are made about boreholes monitoring. Why not assessed or included in the EIA/EMP? ii) In general, the monitoring component is not well linked to the EMP with the monitoring component including aspects not discussed in the EMP and EIA.



As stakeholders, we ask for input on these issues presented prior to the project's commencement.

Kind regards,


 Marais van der Merwe
 Co-Owner

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From: Quzette Bosman <quzette@thenamib.com>
Sent: Thursday, 21 May 2026 2:51 pm
To: esiahaib@udanam.com

Subject: Haib Copper Project - IAP Comment - Solar Grapes

Dear Project Team,

Attached herewith, please find comments from our Client for your consideration.

Can you kindly please acknowledge receipt of the email?

Sincerely,

--

Quzette Bosman-Faul
 Social & Environmental Assessment Practitioner

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esiahaib@udanam.com

From: Joseph Mulders <jmulders@knightpiesold.com>
Sent: Monday, 25 May 2026 11:37 am
To: Quzette Bosman
Cc: [Redacted]
Subject: RE: Haib Copper Project - IAP Comment - Solar Grapes

Good Morning Quzette,

Thank you kindly for sending the comments from your client they are well received. We will work through them and provide detailed responses in due course.

Based on comments received to date please note the following:

- KP will be sending out invites to a dedicated Q&A information session to discuss aspects of the Water Resources and Water Demand study. Dates are not yet set as we are currently in discussion with NamWater on this aspect and working on reviewing all comments received to ensure an effective session.
- As requested, we have further extended the review period by 2 weeks to 9 June 2026. We trust this period since the 6th May will be sufficient for meaningful review.

Please note we are committed to allowing adequate opportunity for comments to ensure all concerns are considered and included in the application for ECC.

Thank you again.
 Joe

Joseph (Joe) Mulders
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 ISO 14001:2015 Certificate No: 170414034/2
 ISO 45001:2018 Certificate No: 271012064/3

Subject: Re: Haib Copper Project - IAP Comment - Solar Grapes

[EXTERNAL EMAIL]

Thank you very much.

I hope you also have a bit of a break next week.

Sincerely,

Quzette Bosman-Faul
 Social & Environmental Assessment Practitioner

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On 21/05/2026 3:52 pm, esiahaib@udanam.com wrote:

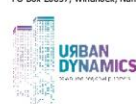
Dear Quzette,

Thank you for sharing the client comments.

Receipt of the email and attached comments is hereby acknowledged. We will review the comments and revert accordingly.

Kind regards,

Heldri Bindemann-Nel
Environmental Practitioner
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urban dynamics

This e-mail is confidential and may also be privileged. If you are not the intended recipient, please notify us immediately.



21 May 2026

To: Knight Piésold (Pty) Ltd
Regarding: Haib Copper Project

Stakeholder Comments on the Proposed Water Abstraction, Supply and Storage Infrastructure, Haib Draft Environmental Impact Assessment and Draft Environmental Management Plan

Dear Sir / Madam ,

Herewith below are our comments for the above reference project. The overall general comment is that initial information release was confusing and the allocated time to review the volume of work insufficient, considering especially the technical nature of documents and volume of work.

Initial documents and link sent out on 06 May for review until 19 May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this web-page, there were two different EIAs related to the Copper Project. With a new application for the abstraction of water suddenly appearing without any prior indication in die BID, (that there would be such an application).

Upon enquiry about the project (through an appointed representative), IAP's were informed that the page will be updated to make it clearer. This was evident on the 13th of May (with two working days remaining in the officially communicated deadline). An extension of the deadline to 26 May was provided. However, the 25th is a public holiday and many operators and member will be travelling from the 22nd. This is, therefore insufficient time to consider the appendices of the EIA for comment as well. Only the EIA and EMP was reviewed (EMP comments on a separate page). It is assumed that the EIA will be a reasonable representation of the findings of the specialist report which would not be reviewed within the timeframe provided.

Numbered Item	Issue
1	<u>Context</u> Initial documents sent out on 6 th of May for review until the 19 th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different EIAs related to the Copper Project. One of which was a new application for the abstraction of water appearing without any prior indication in die BID, that there would be such an application.

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Numbered Item	Issue
	Upon enquiry about the project, IAP's were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline). <u>Concern</u> i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example detailed minutes of the meeting held on 23 April 2026). iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Continued comments will follow regarding specialist reports.
2	<u>Context</u> Mention is made that the project will have to apply for an Abstraction License. <u>Concern</u> i) Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record. ii) Was a sandmining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application). iii) Was a disposal license application submitted for sewage disposal? (Please provide proof of application). iv) A lot of emphasis is placed on the report in regards to the pumps to be used at the abstraction point, but almost no details regarding the dam and pipeline on the same level of detail provided.
3	<u>Context</u> Other companies abstract directly from the Orange River for operations and apply as such for the abstraction. <u>Concern</u> Why is NamWater used for this application?
4	<u>Context</u> Documents available on 07 May included two BID's. On the 13 th of May these were replaced by a single Project BID. <u>Concern</u> i) There are two applications - Should the Project BID now be used for the Water Abstraction EIA? ii) And what BID was used to register the project with MEFT? IAP's should have access to all documentation submitted to the

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Numbered Item	Issue
	Environmental Commissioner. Please provide the BID which was used for each individual application. iii) Was the Water Abstraction BID made available to IAP's during the initial notification of the project? iv) Procurement – Did NamWater follow the Procurement Act 15 of 2015 in securing consultation services for the ECC application? If so, kindly provide the documentation and motivation of successful bidder. If exempted from this requirement, please provide written proof thereof. v) Why are there no dates on the BIDs? vi) Existing BID (as available on 13 May 2026) refers to 87.5 Mtpa to be extracted for 19 Years while the Water abstraction EIA refers to 40 Mtpa. They mention the same total. How is this possible? (87.5M x 19 = 1662.5) (40M x 23 = 920). Neither of these two figures correlate with the scoping report. IAP's request to see the BID which was submitted for each application and the related screening notice received from MEFT related to that BID. Was MEFT made aware that a dam is planned, roughly the size of Oanob Dam at around 70% capacity? (sizing of dam in page 3 of the EIA executive summary 25Mm ³).
5	<u>Context</u> In main EIA there will be a maximum of 3500 staff during construction and 1350 during operations. <u>Concern</u> Will the employment be exclusively for the water infrastructure or for the mine as well? Who will keep the projects separate and how will accountability be managed. Clarity is required regarding this matter.
6	<u>Context</u> Working in the area as Namibian Consultants, such parties should respect the language and names adopted for their Heritage and Cultural Significance within Namibia. <u>Concern</u> All documents use variations in spelling of the region town names etc.
7	<u>Context</u> Consideration was awarded to the authority's clarification questions as part of the stakeholder meeting, as well as the EIA and EMP report. <u>Concern</u>

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Numbered Item	Issue
	i) No mention about the dam, sand mining for the pipeline construction or the disposal licenses required for the wastewater treatment system (catering for 3500 employees during construction). ii) No mention of EIA required for fuel storage or related authorisation from the petroleum commissioner. iii) In the authorities meeting it was mentioned that a separate EIA will be conducted for the power line, yet the powerline was included in this project description. Clarity is required – how will the impact of the power line be considered and assessed. If with NamPower as a proponent, please provide bidding documentation for the ESIA process.
8	<u>Context</u> Page 4. Mention if made in the draft EIA that the MOU between NamWater and the "Haib Copper Mine" is underway. <u>Concern</u> Please provide the draft MOU which forms the basis of why the ECC application can be done. Also provide the relevant sections of the Procurement Act of Namibia related to public entities in this MOU considering procurement of consulting services and works contractors (construction and operations).
9	<u>Context</u> Page 4. Mention is made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made. <u>Concern</u> All IAP are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.
10	<u>Context</u> Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated. <u>Concern</u> A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.
11	<u>Context</u> Diagram on page 13. <u>Concern</u>

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Numbered Item	Issue
	Includes abbreviations not included in the abbreviation list.
12	<u>Context</u> Figure on page 14. <u>Concern</u> Missing a legend.
13	<u>Context</u> Page 16 mentions that "initial feedback" from the CA was provided. <u>Concern</u> Please provide the feedback as well as the data presented for the authority to base their feedback.
14	<u>Context</u> Section 2.1 indicates specialists' studies conducted. <u>Concern</u> i) These do not correlate with the actual specialist studies conducted. For example: Air Quality and Archaeology. Also, preliminary glance of the social assessment seems to be a summary of Namibia Statistics Agency data and not a quantitative and qualitative assessment in terms of SIA requirements.
15	<u>Context</u> Section 3.2 indicating listed activities. <u>Concern</u> No consideration regarding listed activities related to the bulk pipeline, resource extraction, disposal (wastewater treatment of sewage) or fuel storage.
16	<u>Context</u> Table 3.2 mentions activity 5.1 rezoning. Reference is made in the applicability to "potential". <u>Concern</u> Why potentially? Please provide clarity on why this has not been determined. Was a town planning application initiated? If not provide written of approval/ exemption.
17	<u>Context</u> There are two different tables with the same number: 3.2 Table 3.2 mentions activity 8.6 rezoning. Construction of industrial and domestic wastewater treatment plants and related pipeline systems. <u>Concern</u>

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	i) Document contains no details of such as system and or related discussion with MAFWLR related to the disposal permit and location of such a facility / facilities. ii) No mention of the MAFWLR guidelines being used at the moment for Sand Mining in a river (for pipeline construction, dam wall cement etc) or the Guidelines documents used for wastewater disposal.
18	<u>Context</u> IFC mentioned as a Guideline in the table. <u>Concern</u> No relevant guidelines included to transparency and no implementation of the guidelines in terms of the EIA linked.
19	<u>Context</u> The location alternatives are over property earmarked for development. <u>Concern</u> What servitude with is required for this pipeline / power line road etc?
20	<u>Context</u> Section includes a mention of the transmission line for power supply (Figure 4-6). <u>Concern</u> This figure does not include the power line.
21	<u>Context</u> Figure 4.1 – As a flank wall in the figure and wing wall in the caption. <u>Concern</u> Is it a wing or flank wall? No description in the text of this structure, dimensions/ material. What is it and how will it impact the morphology of the river - erosion and deposition patten along the bank.
22	<u>Context</u> Page 27 details the pipeline to be constructed. <u>Concern</u> The pipeline will have to rest on a particular substrate - softer sand? Where will this material be sources and how licensed?
23	<u>Context</u> Page 28 mentioned quarry material (for the dam wall) will be sourced from the first pit excavations. <u>Concern</u>

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	Please provide EIA for Mining to consider the pit design and location and also the timing of the entire project. When will dam be built and when will they start mining?
24	<u>Context</u> Page 28 mentions SANCOLD. <u>Concern</u> i) Not in the reference list not included in guidelines considered. ii) Are there no Namibian Requirements available and was this confirmed with MAFWLR? Namibian rivers are vastly different from South African rivers. Can not provide efficient comment since the reference can't be traced.
25	<u>Context</u> Page 29 mentions the transmission line and road. <u>Concern</u> i) No details on the size of the transmission line, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc. ii) No details on the size of the road, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc.
26	<u>Context</u> Section 4.4 First sentence: Material sources and quarries required for construction purposes (such as concrete batching or bedding for the pipeline) will be sourced from locations as not to contribute or minimise extent the total impact footprint of the Project. <u>Concern</u> "Will be sourced from locations?" The entire sentence needs rewording to clarify the confused text and indicate where these locations will be".
27	<u>Context</u> Section 4.5.2 states timing of water abstraction EIA and Mine EIA will be in parallel. <u>Concern</u> No details provided for temporary water requirements for construction and related storage etc. How will it be achieved.
28	<u>Context</u> Section 4.5.2 mentioned dam operations. <u>Concern</u>

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	Who will be responsible when the storage dam become contaminated - who will be responsible for rehabilitation - since tailing will not be lined and dust could be toxic.
29	<u>Context</u> Section 4.5.3.2.3 mentions that groundwater inflows into the mine pit due to the low rainfall recharge and the low aquifer yield. <u>Concern</u> i) How can this statement be made without a groundwater assessment available for review and in the possible interconnection between the dam saturation level and seepage to the underground resources. No such information is part of this EIA.
30	<u>Context</u> Project description. <u>Concern</u> It is important to know where the main polluting aspects will be located as these seem all to be upstream of the storage dam and can lead to significant pollution in the long term and after closure - it is imperative to understand the groundwater flow - dust from the tailing etc - as to consider the pollution risk and rehabilitation costs which NamWater will have to carry. Dust may for example have Thallium which bioaccumulates and is toxic - Thallium ((Tl)) is a highly toxic, heavy metal often found in copper ((Cu)) ores, where it acts as a significant environmental pollutant during smelting. Thallium is more poisonous than copper or mercury, causing severe neurological damage, hair loss, and potential death.
31	<u>Context</u> Alternatives section descriptions. <u>Concern</u> The section is lacking in many aspects including technical alternatives related to the design of the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example – dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community development for over 35 years. Also, Alternative uses for the water include addition sustainable agricultural projects which have a much longer sustainability track-record etc vs the mine and 23 years. Note that current

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	irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream.
32	<u>Context</u> Section 5.2 mentions minutes of the meeting held on 26 April 2026. <u>Concern</u> Please provide a copy of the minutes for review.
33	<u>Context</u> Section 5.4 indicates a review period of 7 working days. <u>Concern</u> Please revert to comment 1 regarding document review time and documents for review.
34	<u>Context</u> Section 6.1. <u>Concern</u> Climate section extremely restricted and needs a full description to include: Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.
35	<u>Context</u> Figure 6.1. <u>Concern</u> Directional pictures are advisable for visual descriptions.
36	<u>Context</u> Section 6.4 <u>Concern</u> i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.
37	<u>Context</u> Geology. <u>Concern</u>

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Numbered Item	Issue
	i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral silt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.
38	<u>Context</u> Soil <u>Concern</u> Soils of the various rivers not mentioned or explained / elaborated on. Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where the dam will be constructed? In the EMP a soil depth of 15cm is mentioned. Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Atlas of Namibia classifies the project area as having the dominant soil type of <i>Eutric Skeletic Lithic Leptosol</i> . <i>Eutric</i> inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case.
39	<u>Context</u> Section 6.5 states the following: "Haib River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected trees". And "...protected species are dominant and the Haib River is a sensitive habitat..." <u>Concern</u> i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated.

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	ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IFC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. iii) The proposed storage dam is located in a tributary of the Haib River, therefore according to the statement it should also be a sensitive /special ecological area. iv) No off-sets have been even mentioned in the environmental management plan for the modification of this 160 ha.
40	<u>Context</u> On page 54 the report states the following: "The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint." <u>Concern</u> It is recorded here that 6 trees and shrubs are located in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint. 
41	<u>Context</u> Section 6.9.1 states: "River. The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the assurance of water supply to the existing users."

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	<u>Concern</u> The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibian which sees the implementation of a new water act and numerous applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm³ not included in the consideration already between Blouputs and the abstraction point.
42	<u>Context</u> Page 61 indicated that ORASECOM has included some water requirements for the future Haib mine. <u>Concern</u> What amount was this?
43	<u>Context</u> Section 6.9.1.1 States: "River. • If the water required for the Haib Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderkloof dams), the number of years with restrictions increased from 7 (without Haib Mine) to 9 (out of the 85 years assessed). When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small." <u>Concern</u> Quantify small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.
44	<u>Context</u> Page 62 stated that abstraction is possible during high-flow periods. <u>Concern</u> The lower Orange River is regulated and dependant on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release requests be timed as not to impact on higher volume requirements at other times from farmers? Is there then a possibility that RSA will be continually requested to release water for "surplus" flow?
45	<u>Context</u> Page 62 mentioned EWR. <u>Concern</u>

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	Please add to the abbreviation list.
46	<u>Context</u> On page 66 the report states: "Note the analysis above are ongoing as part of the studies to assess the feasibility of the mine project." <u>Concern</u> We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.
47	<u>Context</u> Section 6.10. Air Quality. <u>Concern</u> Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.
48	<u>Context</u> Page 71 states: "the absence of strong winds". <u>Concern</u> No wind data was included in the report and preliminary view of the Air quality assessment indicates unreferenced wind data of a short duration. Even so, the data (windspeeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).
49	<u>Context</u> Section 6.11. <u>Concern</u> i) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? iii) How many boreholes are in the zone of influence? iv) Please provide the zone of influence for the dam. v) Inconsistency related to the evaporation rates throughout the document. vi) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It

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Numbered Item	Issue
	would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.
50	<u>Context</u> Section 6.12. <u>Concern</u> Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.
51	<u>Context</u> Section 7.3.3 States: "Although physical infrastructure will be developed, this will likely not restrict movement of local communities and wildlife movement across the terrain." <u>Concern</u> The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?
52	<u>Context</u> Section 7.3.4. <u>Concern</u> i) How will the flank wall affect the drainage and river morphology? ii) Where will the sand required for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river?
53	<u>Context</u> Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur. <u>Concern</u> Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".
54	<u>Context</u> Section 7.3.6. <u>Concern</u> i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Haib River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the

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Numbered Item	Issue
	dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered. ii) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? iii) Decommissioning soil erosion impacts is stated to be the same as that of the construction phase. How is this possible after a dam is decommissioned?
55	<u>Context</u> Section 7.3.7. <u>Concern</u> i) In the report the sensitivity of the washes is mentioned, however a major miss here is that rivers and washes are wildlife corridors to the Orange River - especially in this area. The alteration of the patterns and impact on a portion of possible critical habitat is not assessed. ii) Impacts on birds and especially endangered species not sufficiently described and assessed. It becomes especially important to note that the alternative powerline designs may also vary in impact significance. No assessment in this regard was conducted and even mentioned. In fact, a one liner here indicates a low significance - how was this determined? iii) A new habitat will be created with the construction of a dam - the impact was not mentioned or fully developed. iv) The sensitive habitat and determination of the critical habitat needs to be included in the impact rating to be property quantified. v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned.
56	<u>Context</u> Section 7.3.9. <u>Concern</u> i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected. iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.

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57	<u>Context</u> Section 7.3.9.2. <u>Concern</u> i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operations will have catastrophic results. ii) As mentioned before: Between Blouputs and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to over abstraction during the operational phase.
58	<u>Context</u> Section 7.3.10. <u>Concern</u> Mitigation is not mentioned or explained and neither is the impact on the vegetation no included. For example - what is the expected dust settlement / fallout area for the dam wall construction and will this impact the sensitive Haib River vegetation as mentioned? - Not mentioned in Flora/Fauna either.
59	<u>Context</u> Section 7.3.11. <u>Concern</u> i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.
60	<u>Context</u> 7.3.12 Hydrogeology. <u>Concern</u> The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled.

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61	<u>Context</u> 7.3.13 Archaeology. <u>Concern</u> i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.
62	<u>Context</u> Section 7.3.14. <u>Concern</u> i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. If the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailings facility – how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.
63	<u>Overall Questions:</u> i) Will the proponent request water to be released from SA, during multiple and consecutive years of drought? To ensure they can have surplus flow? And when will this be timed for? ii) Will the pumps be suitably scaled to allow for shorter abstraction period (in order to achieve the required volume) and was this consideration included anywhere as an alternative etc.

Regards,



D Bezuidenhout

21 May 2026

Date

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APPENDIX E.2– EIA PHASE



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Re: Further Comments on the Addendum to the Water Resources and Water Demand Study, the Draft EMP Rev B, and the NamWater Draft EIA Rev B – Halb Copper Project and Related Water Abstraction, Supply and Storage Application (MEFT: APP-006117 and APP-006907)

Dear Joe

Following the public meeting held on 14 August 26, the second round of the EIA and EMP review. I am submitting further comments after our discussions to give comfort around certain principles.

We acknowledge Koryx Mine's operations over the past year and the proposed large-scale expansions that promise to bring all the investment opportunities to the region. However, it is our duty to express our deepest concern regarding the application to extract additional water from the Orange River.

The established agricultural sector in this area currently spans between 2,000 and 3,000 hectares. This economic hub directly and indirectly supports between 15,000 and 20,000 people who are entirely dependent on these businesses for their survival and the livelihood of their families. The Orange River is the sole lifeline for this entire community. During the droughts of the past ten years, the river has already come to a complete standstill on several occasions. Any additional extraction places the existing economy and thousands of livelihoods at extreme risk.

To achieve legal and economic certainty for the future, we urgently request formal written feedback and assurance regarding the following critical aspects:

- 1. International Water Allocations and Latest Agreements**
What is the exact, formal water allocation from South Africa to Namibia according to the latest bilateral agreement? According to our knowledge, the latest agreement was signed in the 1980s. Confirmation on whether any newer binding agreements exist between the two countries that redefine Namibia's official rights regarding the consumption and protection of this shared water source.

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- 2. Current Permit Allocations vs. Namibia's Quota**
How does the total volume of water permits already approved by The Ministry of Agricultural, Water and Forestry (MAWF) compared to the actual volume of water that Namibia is legally entitled to, to the latest official agreements? We need certainty that the river is not already over-allocated with the status quo together with future developments. Figures shared during this meeting from Manie, is already a concern and looks that we have a shortage.
- 3. Management Protocol and Management Control**
Minimum flow levels are constantly calculated and adjusted, yet the management of these levels remains entirely outside our control and is regulated by South Africa. Records from the past ten years show that poor management, combined with extreme natural factors, has already caused severe economic damage due to either floods or total stand still of the river. How can you assure us that this already fragile situation will not worsen and further threaten our businesses?
When the region enters another severe drought and river levels drop to critical minimums or come to a standstill, whose decision does it become whether the mine may continue extracting water? The management protocol should be structured in such way that downstream users have the insurance of the sustainability of the water source. We demand the names, titles, and official entities of the specific individuals who will carry the legal responsibility and provide the assurance that agricultural and human needs will take priority over industrial use.
- 4. System Management include the Agricultural Sector**
Our primary remaining concern is the overall decision-making mechanism (Water Abstraction protocol) of the system. As the status quo it solely lies within Namwater, we need participation in the process to support and create guidance.

The agricultural sector cannot operate merely on good faith; we require legal and technical assurances that Koryx Mine's expansion will not come at the expense of thousands of existing jobs and the economic stability of the Noordoewer region.
We look forward to your comprehensive, written, and transparent response to each of these points.



Sincerely,

Albert van der Merwe
Chief Executive Officer (CEO): Sonop Farming PTY Ltd

Directors: Albert vd Merwe; Nico vd Merwe (Jnr)

Achill Island Investments (PTY) Ltd

17 August 2026

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Dear Joe

Re: Further Comments on the Addendum to the Water Resources and Water Demand Study, the Draft EMP Rev B, and the NamWater Draft EIA Rev B — Haib Copper Project and Related Water Abstraction, Supply and Storage Application (MEFT: APP-006117 and APP-006907)

Thank you for the Addendum to the WRWD Study (6 August 2026), the Draft EMP Rev B, and the NamWater Draft EIA Rev B, all issued in the days following our letter of 4 August 2026. We want to acknowledge, upfront, that they represent real progress on some of the points we raised. However, on the issues that matter most to our ability to support these applications, the revisions do not go far enough. We are submitting these further comments within the current Round 2 EIA and EMP Review Period (6–21 August 2026).

1. The Water Abstraction Protocol Should Be a Standalone, Independently Operated Document

The new Water Abstraction Framework in EMP Section 4.2.5 is a useful description of the intended control logic, but it is a subsection of the EMP. The Protocol itself is still described as something to be “finalised to include operational details and key roles and responsibilities within NamWater prior to any abstraction commencing” (EMP Section 4.2.1). That leaves it as an internal NamWater commitment folded into general EMP compliance, rather than a discrete, controlled operating document with its own monitoring, reporting and enforcement pathway that MEFT and downstream users can track directly. We ask that the Protocol be issued as a stand-alone instrument, formally referenced in the ECC, capable of being audited and enforced independently of the EMP as a whole.

2. Downstream Users Still Have No Role in Finalising or Managing the Protocol

The same EMP provision (Section 4.2.1) describes finalisation of the Protocol as a process internal to NamWater. No mechanism is proposed for downstream users to review or comment on its terms before it is finalised, nor for any ongoing role once it is operational. This was one of our core requests in both our May and 4 August submissions and remains unaddressed. We again ask for a defined role for downstream users: at minimum, an opportunity to review and comment on the draft Protocol before it is finalised, and an agreed mechanism — such as a joint monitoring arrangement — for its ongoing operation.

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3. The Data Underlying the Minimum Flow Calculation Appears Unreconciled

Mr Manie Mare of WRP — whose firm carries out the WRM/WRPM modelling and Annual Operating Analysis underlying the Blouputs minimum flow — presented to the Namibian Grape Growers Association on 24 June 2026.

In this presentation he provided the below information:

- Licenses issued to Namibia for Lower Orange irrigation: approximately 129–130 million m³/a
- Actual measured Namibian irrigation use in 2024: 102.5 million m³/a
- Volume South Africa states it is currently releasing for Namibian irrigation: 75 million m³

We are concerned that the definition of the Blouputs minimum flow may be compromised given there is uncertainty on the accuracy of the underlying data used for determining the minimum flow.

We don't know how best to address these concerns and note that you have also acknowledged that the usage information is not always clear.

The current proposal is that the defined Blouputs Minimum Flow will need to be relied upon to protect downstream users. The question we have is what happens if this minimum flow calculation is determined to be inaccurate.

Conclusion

We recognise the work your team has put into these revisions over a very short period, and the additional transparency they provide is genuinely helpful. But on the two matters we identified as central in our 4 August letter — the Protocol becoming a real, independently governed instrument with a stakeholder role, and the minimum flow commitment becoming a binding ECC condition — the position is largely unchanged, and the reliability of the underlying minimum flow data is now, in our view, more clearly in question than before. Our support for these applications remains conditional on these points being resolved.

Given the compressed timeline of the current review period, we would welcome the opportunity to discuss these points with you directly. We remain committed to engaging constructively in this process.

Yours sincerely,



Kevin Liddle
Director
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APPENDIX F COMMENTS AND RESPONSE REGISTER

APPENDIX F.1 SUMMARY OF KEY ISSUES RAISED DURING THE DRAFT EIA REVIEW

Summary of Aspects Commented On
PROCESS AND PUBLIC PARTICIPATION
Comment periods, notice, stakeholder meetings, minutes access, NamWater's introduction as applicant.
DOCUMENTATION CLARITY AND QUALITY
Some missing legends/ labels/ abbreviations, units and wording, spelling/place names.
LEGAL, PERMITTING AND COMPLIANCE
Abstraction licenses, sand mining, sewage/disposal permits, fuel storage and blasting authorisations, listed activities coverage, petroleum commissioner, town planning/rezoning, procurement compliance.
GOVERNANCE AND COMMERCIAL TRANSPARENCY
NamWater–Haib Minerals MoU disclosure, operator responsibilities, ownership/operation split, servitudes and access rights.
PROJECT DEFINITION, DESIGN AND ALTERNATIVES
Intake, pipeline, dam, powerline and road design details; siting/servitudes; technical alternatives (dam type, pole design, pipeline burial); construction methodologies and materials sourcing.
WATER RESOURCES AND ABSTRACTION STRATEGY
Surplus-flow approach, abstraction triggers (Blouputs vs Vioolsdrift/ Noordoewer), Ecological Water Requirements (EWR) protection, operating rules, calibration of pumps/meters, construction water sourcing, cumulative demand and water rights transparency.
HYDROLOGY AND RIVER MORPHOLOGY
Effects of intake/flank wall on erosion/deposition, channel stability, flood behaviour, stormwater management and sizing.
GROUNDWATER AND HYDROGEOLOGY
Dam seepage/infiltration, zone of influence, borehole locations, recharge rates, numerical modelling assumptions/results, interaction with tailings/pollution plumes.
BIODIVERSITY AND ECOLOGY (TERRESTRIAL AND AQUATIC)

Summary of Aspects Commented On
Sensitive/riparian habitats mapping and buffers, wildlife corridors, critical habitat assessment, biodiversity offsets, creation/management of new aquatic ecosystem (dam), avifauna risks (powerlines) and mitigations.
AIR QUALITY, NOISE AND VIBRATION
Dust (tailings to dam), wind dataset adequacy, dispersion modelling inputs, construction noise/vibration, fauna sensitivity.
WASTE, HAZARDOUS MATERIALS AND POLLUTION CONTROL
Gaps include waste management plans, sewage handling and treatment, hazardous storage (MSDS/SANS), stormwater controls (silt fences/settlement ponds), spill and emergency response.
HERITAGE AND ARCHAEOLOGY
Site mapping vs confidentiality, chance-find procedures, integration into EMP/layouts.
SOCIAL, ECONOMIC AND HEALTH
Social Impact Assessment (SIA) labour/influx and skills competition, downstream livelihood/job risks, health baseline and link to water quality, employment figures attribution.
VISUAL AND LANDSCAPE
Visual impact of dam/walls/camps, housekeeping and rehabilitation measures.
MONITORING, EMP AND ADAPTIVE MANAGEMENT
Strength of EMP measures, linkage to monitoring, flow monitoring downstream, borehole networks, instrument calibration, updates on amendments.
DAM SAFETY AND RISK
Classification standards (Namibian regs vs SANCOLD [South African National Committee on Large Dams]), hazard potential, dam break/failure consequence analysis, decommissioning and contaminated sediments.
DATA, MODELLING AND ASSUMPTIONS
Use of Annual Operating Analysis updates, climate change scenarios, Sendelingsdrift observations vs model, method transparency, cumulative modelling scope.

APPENDIX F.2 DETAILED ISSUES, COMMENTS AND RESPONSES REGISTER

COMMENTS AND RESPONSE REGISTER- HAIB WATER ABSTRACTION AND SUPPLY APPLICATION FOR ECC Comments received 23 April to 09 June 2026

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Namibia Grape Company on 22 May 2026		
	Dear Sir/Madam Please find below our comments for the above-mentioned project. The overall comment is that initial information released was confusing and time allocation for review on the huge volume of documents was not sufficient, considering the technical nature of it.	Thank you. The original comment period starting 06 May to 19 May was extended to 09 June 2026. The process specifically seeks to facilitate stakeholder engagement and has responded positively to all requests for clarity and time.
Orange River Vineyards Investments on 20 May 2026. Namibian Grape Growers Association on 21 May 2026. Karsten Namibia Agriculture (PTY) LTD on 21 May 2026. Solar Grapes on 21 May 2026. Karas Date Farming (PTY) LTD on 09 June 2026.		
	The overall general comment is that initial information release was confusing and the allocated time to review the volume of work insufficient, considering especially the technical nature of documents and volume of work.	The original comment period starting 06 May to 19 May was extended to 09 June 2026. The process specifically seeks to facilitate stakeholder engagement and has responded positively to all requests for clarity and time.
Introduction	Initial documents and link sent out on 06 May for review until 19 May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this web-page, there were two different EIAs related to the Copper Project. With a new application for the abstraction of water suddenly appearing without any prior indication in die BID, (that there would be such an application).	Thank you for the comment. It became evident through discussion with the appointed representative that the website was confusing. The team therefore took steps to improve clarity on the website as well as extended the review period by an additional 3 weeks. The process

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	Upon enquiry about the project (through an appointed representative), IAP's were informed that the page will be updated to make it clearer. This was evident on the 13th of May (with two working days remaining in the officially communicated deadline). An extension of the deadline to 26 May was provided. However, the 25th is a public holiday and many operators and member will be travelling from the 22nd. This is, therefore, insufficient time to consider the appendices of the EIA for comment as well. Only the EIA and EMP was reviewed (EMP comments on a separate page). It is assumed that the EIA will be a reasonable representation of the findings of the specialist report which would not be reviewed within the time-frame provided.	specifically seeks to facilitate stakeholder engagement and has responded positively to all requests for clarity and time.
Orange River Vineyards Investments on 20 May 2026. Namibian Grape Growers Association on 21 May 2026. Karsten Namibia Agriculture (PTY) LTD on 21 May 2026. SONOP Farming on 21 May 2026 Solar Grapes on 21 May 2026. Noordoewer Guesthouse/Gastehuis on 21 May 2026. Amanzi Trails River Adventures on 21 May 2026. Karas Date Farming (PTY) LTD on 09 June 2026.		
1 Context Initial documents sent out on 6th of May for review until the 19th of May 2026 leads to a page that contains downloadable documentation of more than 1200 pages. On this page, there were two different EIAs related to the Copper Project. One	Concern i) Reasonable allowance for time to review documents referred to is insufficient. Reasonable time should be provided to all stakeholders for the review of all documentation. ii) All information for contextual review was not available within the review slot (for example, detailed minutes of the meeting held on 23 April 2026). iii) Due to the restricted comment period, considering the volume of work to read, only comments on the EIA and EMP could be provided. Continued comments will follow regarding specialist reports.	Comment refers to those received during the period 06 to 26 May 2026. Upon receipt of these comments the review period was extended to the 09 th of June 2026. The minutes were not provided as these were under development. These will be included in the comments and responses register. Noted. As described above, additional time was provided at every request.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
of which was a new application for the abstraction of water appearing without any prior indication in die BID, that there would be such an application. Upon enquiry about the project, IAPs were informed that the page will be updated to make it clearer. This was evident on 13 May 2026 (with two working days remaining in the officially communicated deadline).		
2 Context Mention is made that the project will have to apply for an Abstraction License.	Concern Was such a submission made yet? If so, please provide a copy of the application as well as the proof of submission record. Was a sandmining application made to MAFWLR for the removal of sand from a river? (Please provide proof of application). Was a disposal license application submitted for sewage disposal? (Please provide proof of application). A lot of emphasis is placed on the report in regard to the pumps to be used at the abstraction point, but almost no details regarding the dam and pipeline on the same level of detail provided.	Take note: This comment relates to the EIA for the Proposed Mining Activities by Haib Minerals (Pty) Ltd. i), ii) and iii) No. Please note that the Project is currently in the Pre-Feasibility phase, whereby the feasibility of the Project is being defined through ongoing investigations and analyses. iv) Thank you, the comment/concern is noted; please refer to Section 4 of the Report.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
3 Context Other companies abstract directly from the Orange River for operations and apply as such for the abstraction.	Concern Why is NamWater used for this application?	During the development of the Project, the identification of partnership opportunities between Haib Minerals and NamWater were identified. A Memorandum of Understanding (MoU) between the two parties is currently under development.
4 Context Documents available on 07 May included two BID's. On the 13th of May these were replaced by a single Project BID.	Concern i) There are two applications - Should the Project BID now be used for the Water Abstraction EIA? ii) And what BID was used to register the project with MEFT? IAP's should have access to all documentation submitted to the Environmental Commissioner. Please provide the BID which was used for each individual application. iii) Was the Water Abstraction BID made available to IAPs during the initial notification of the project? iv) Procurement – Did NamWater follow the Procurement Act 15 of 2015 in securing consultation services for the ECC application? If so, kindly provide the documentation and motivation of successful bidder. If exempted from this requirement, please provide written proof thereof. v) Why are there no dates on the BIDs? vi) Existing BID (as available on 13 May 2026) refers to 87.5 Mtpa to be extracted for 19 Years while the Water abstraction EIA refers to 40 Mtpa. They mention the same total. How is this possible? $(87.5M \times 19 = 1662.5)$ $(40M \times 23 = 920)$. Neither of these two figures correlate with the scoping report. IAP's request to see the BID which was submitted for each application and the related screening notice received from MEFT related to that BID. Was MEFT made aware that a dam is planned, roughly the size of Oanob Dam at around 70% capacity? (sizing of dam in page 3 of the EIA executive summary 25Mm ³).	i & ii) There are two Project BIDs one for the proposed mining activities and another for the water management activities. Both BIDs have been used to register activities with MEFT. iii) The Water Abstraction BID was not available during the original (17 July 2025) notification however all activities were included in the BID that was available. The Water Abstraction BID was available during the second notification (30 March 2026). iv) The Consultants were appointed by Haib Minerals. NamWater will not construct the water supply infrastructure, but will only operate the water supply scheme. Therefore the procurement of design consultants and contractor will be the responsibility of Haib Minerals. v) The comment re the omission is noted. vi) 87.5 Mtpa refers to the total material extracted (mineralised and non-mineralised material) and 40 Mtpa refers to the ore to be processed only.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		There are various non-correlations to the scoping report. This is as updated designs have been integrated into the latest EIA. The changes do not alter the listed activities and are not seen as drivers of material changes to impact significance. Both BIDs and screening notices have been uploaded on the website. The specific reference to Oanob Dam was not made however all details are clearly articulated.
5 Context In main EIA there will be a maximum of 3500 staff during construction and 1350 during operations.	Concern Will the employment be exclusively for the water infrastructure or for the mine as well? Who will keep the projects separate and how will accountability be managed. Clarity is required regarding this matter.	See Section 4.4: The broad mine plan indicates that a maximum of 3 500 to 5 000 staff during construction (depending if construction is 3 or 2 years respectively) and a maximum of 1 350 during operations will be required by the Project.
6 Context Working in the area as Namibian Consultants, such parties should respect the language and names adopted for their Heritage and Cultural Significance within Namibia.	Concern All documents use variations in spelling of the region town names etc.	The comment/concern is noted. The Karas Region is now referred to as the //Kharas Region (also see Kharas Regional Council Facebook). The Namibia Statistics Agency refers to both e.g. //Karas Regional Profile (Karas Regional Profile Business Establishment - Namibia Statistics Agency).
7 Context	Concern	Please note that the Project is currently in the Pre-Feasibility phase, whereby the

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Consideration was awarded to the authority's clarification questions as part of the stakeholder meeting, as well as the EIA and EMP report.	i) No mention about the dam, sand mining for the pipeline construction or the disposal licenses required for the wastewater treatment system (catering for 3500 employees during construction). ii) No mention of EIA required for fuel storage or related authorisation from the petroleum commissioner. iii) In the authorities meeting it was mentioned that a separate EIA will be conducted for the power line, yet the powerline was included in this project description. Clarity is required – how will the impact of the power line be considered and assessed. If with NamPower as a proponent, please provide bidding documentation for the ESIA process.	feasibility of the Project is being defined through ongoing investigations and analyses. The power line was included, but it will be subject to an additional Environmental Assessment process. Please see Table 3-3 in the EMP.
8 Context Page 4. Mention if made in the draft EIA that the MOU between NamWater and the "Haib Copper Mine" is underway.	Concern Please provide the draft MOU which forms the basis of why the ECC application can be done. Also provide the relevant sections of the Procurement Act of Namibia related to public entities in this MOU considering procurement of consulting services and works contractors (construction and operations).	Company confidential information will not be made available to external parties. The Consultants were appointed by Haib Minerals. NamWater will oversee the construction of the water supply infrastructure by Haib Minerals prior to handover to their specifications. Therefore the procurement of design consultants and contractor is the responsibility of Haib Minerals.
9 Context Page 4. Mention if made in the draft EIA, that should the scope of activities be changed, that an amendment to the ECC application will be made.	Concern All IAP are to be provided with the amendment documentation to provide comment. The Concern to be highlighted to the Environmental Commissioner.	The proponent and consultants are aware that any changes to, or deviations from the scope of project activities approved in respect to the assessment received and reviewed for the purpose or granting the ECC, are subject to an amendment application and approval by the Environmental Commissioner prior to adopting or implementing any such changes/deviations.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
10 Context Page 5 states: A Public Consultation Programme was also conducted. Stakeholder consultation to date has not identified any issues or concerns that cannot be successfully addressed or mitigated.	Concern A serious concern relates to the volume of water to be abstracted as well as other concerns mentioned in this report, especially of listed activity-triggering aspects not fully developed or discussed in the report.	Thank you, the comments/concerns are noted. Please see Sections 3.2, 6.9, and Appendix F.
11 Context Diagram on page 13.	Concern Includes abbreviations not included in the abbreviation list	Thank you, the comment is noted and has been addressed.
12 Context Figure on page 14.	Concern Missing a legend.	Thank you, the comment is noted and has been addressed.
13 Context Page 16 mentions that "initial feedback" from the CA was provided.	Concern Please provide the feedback as well as the data presented for the authority to base their feedback.	To date no feedback has been received from the Competent Authority.
14 Context	Concern i) These do not correlate with the actual specialist studies conducted. For example: Air Quality and Archaeology. Also, preliminary glance of the social assessment seems to	Thank you, the comment is noted and has been addressed. Please refer to Appendix E.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Section 2.1 indicates specialists' studies conducted.	be a summary of Namibia Statistics Agency data and not a quantitative and qualitative assessment in terms of SIA requirements.	
15 Context Section 3.2 indicating listed activities.	Concern No consideration regarding listed activities related to the bulk pipeline, resource extraction, disposal (wastewater treatment of sewage) or fuel storage.	Thank you, the comment/concern is noted; please see Section 3.2.
16 Context Table 3.2 mentions activity 5.1 rezoning. Reference is made in the applicability to "potential".	Concern Why potentially? Please provide clarity on why this has not been determined. Was a town planning application initiated? If not provide written of approval/ exemption.	Thank you, the comment/concern is noted and has been addressed.
17 Context There are two different tables with the same number:3.2 Table 3.2 mentions activity 8.6 rezoning. Construction of industrial and domestic wastewater treatment plants and related pipeline systems.	Concern i) Document contains no details of such as system and or related discussion with MAFWLR related to the disposal permit and location of such a facility / facilities. ii) No mention of the MAFWLR guidelines being used at the moment for Sand Mining in a river (for pipeline construction, dam wall cement etc) or the Guidelines documents used for wastewater disposal.	Please note that the Project is currently in the Pre-Feasibility phase, whereby the feasibility of the Project is being defined through ongoing investigations and analyses. All the required licenses will be applied for in due course (e.g. as per Part 12 of the Water Resources Management Regulations: Water Resources Management Act, 2013 – as applicable; Please see Table 3-3 in the EMP. ii)The Water Resources Management Act 11 of 2013 and the Water Resources Management Regulations 2023 are used to guide these aspects. Any guidelines

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		that supersede these will be relevant to this application.
18 Context IFC mentioned as a Guideline in the table.	Concern No relevant guidelines included to transparency and no implementation of the guidelines in terms of the EIA linked.	The IFC EHS guidelines were included under "International Best Practice". The current EIA does not comply with the Performance Standards of the IFC / is not IFC compliant.
19 Context The location alternatives are over property earmarked for development.	Concern What servitude with is required for this pipeline / power line road etc?	No servitude is required as this is access controlled land. The power line outside EPL 3140 was included, but it will be subject to an additional Environmental Assessment process.
20 Context Section includes a mention of the transmission line for power supply (Figure 4-6).	Concern This figure does not include the power line.	Thank you, the comment/concern is noted and has been addressed.
21 Context Figure 4.1 – As a flank wall in the figure and wing wall in the caption.	Concern Is it a wing or flank wall? No description in the text of this structure, dimensions'/ material. What is it and how will it impact the morphology of the river - erosion and deposition patter along the bank.	A wing wall. See section 4.1 in the EIA. See section 7.3.9.1 See appendix K
22 Context Page 27 details the pipeline to be constructed.	Concern The pipeline will have to rest on a particular substrate – softer sand? Where will this material be sources and how licensed?	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		Please see Table 3-3 in the EMP.
23 Context Page 28 mentioned quarry material (for the dam wall) will be sourced from the first pit excavations.	Concern Please provide EIA for Mining to consider the pit design and location and also the timing of the entire project. When will dam be built and when will they start mining?	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> The construction phases of both the NamWater and Haib Minerals applications will run in parallel. The dam will be built during the construction phase of the Mine, with construction commencing approximately 2 to 3 years before the planned Mine operation. Please note that the Project is currently in the Pre-Feasibility phase, whereby the feasibility of the Project is being defined through ongoing investigations and analyses.
24 Context Page 28 mentions SANCOLD.	Concern i) Not in the reference list not included in guidelines considered. ii) Are there no Namibian Requirements available and was this confirmed with MAFWLR? Namibian rivers are vastly different from South African rivers. Can not provide efficient comment since the reference can't be traced.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> ii) Namibia's guidelines for the classification of dams are provided in Annexure 12 (Relating to Regulation 72) of Government Notice No. 269, in Government Gazette No. 8187 of 29 August 2023 as relating to the Water Resources Management Act of Namibia, 11 of 2013, according to which the dam would be classified as Large or Category 3. This is the same classification as with SANCOLD (South African National Committee on Large Dams). The RSA

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		guidelines are generally used as the Namibian guidelines do not consider the hazard potential rating in the dam classification which the South African guidelines do.
25 Context Page 29 mentions the transmission line and road.	Concern i) No details on the size of the transmission line, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc. ii) No details on the size of the road, the servitude required or the routing. EMP does not indicate alignment - no concrete delineation of sensitive area or topographical features etc.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> The power line was mentioned or included, but it will be subject to an additional Environmental Assessment process. No formal registration of servitude for the access road is envisaged across the EPL / ML. The sensitive areas were identified in the terrestrial study however at this scale and level of design it is impractical to define ground level polygons. Please note that the Project is currently in the Pre-Feasibility phase, whereby the feasibility of the Project is being defined through ongoing investigations and analyses.
26 Context Section 4.4 First sentence: Material sources and quarries required for construction purposes (such as concrete batching or	Concern "Will be sourced from locations?" The entire sentence needs rewording to clarify the confused text and indicate where these locations will be".	Thank you, the comment/concern is noted and has been addressed. See section 4.3 of the EIA.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
bedding for the pipeline) will be sourced from locations as not to contribute or minimise extent the total impact footprint of the Project.		
27 Context Section 4.5.2 states timing of water abstraction EIA and Mine EIA will be in parallel.	Concern No details provided for temporary water requirements for construction and related storage etc. How will it be achieved.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Also See Section 4.3 of the Water Abstraction EIA.
28 Context Section 4.5.2 mentioned dam operations.	Concern Who will be responsible when the storage dam become contaminated - who will be responsible for rehabilitation - since tailing will not be lined and dust could be toxic.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i>
29 Context Section 4.5.3.2.3 mentions that groundwater inflows into the mine pit due to the low rainfall recharge and the low aquifer yield.	Concern i) How can this statement be made without a groundwater assessment available for review and in the possible interconnection between the dam saturation level and seepage to the underground resources. No such information is part of this EIA.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix G of the above EIA.
30 Context Project description.	Concern It is important to know where the main polluting aspects will be located as these seem all to be upstream of the storage dam and can lead to significant pollution in the long	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	term and after closure - it is imperative to understand the groundwater flow - dust from the tailing etc - as to consider the pollution risk and rehabilitation costs which NamWater will have to carry. Dust may for example have Thallium which bioaccumulates and is toxic - Thallium (Tl) is a highly toxic, heavy metal often found in copper (Cu) ores, where it acts as a significant environmental pollutant during smelting. Thallium is more poisonous than copper or mercury, causing severe neurological damage, hair loss, and potential death.	<i>PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix G, H and N of the above EIA. Also see section 7.3.12 and 7.3.13 of the above EIA.
31 Context Alternatives section descriptions.	Concern The section is lacking in many aspects including technical alternatives related to the design of the pipeline, power line and dam. Location alternatives and servitudes of infrastructure etc. For example – dam design may affect the evaporation potential while pole design may affect bird collisions. Pipelines may become wildlife barriers etc. There is also no mention of the risk to existing operations which have seen generational employment and consistent job opportunities and community development for over 35 years. Also, Alternative uses for the water include addition sustainable agricultural projects which have a much longer sustainability track-record etc vs the mine and 23 years. Note that current irrigation related operations at risk due to over abstraction will threaten over 10,000 jobs on record for the area downstream.	Thank you, the comments/concerns are noted. Alternative positions as well as technical alternatives which look at risks of bird collisions and/or wildlife barriers are assessed in the terrestrial biodiversity specialist report- see Appendix C. In terms of risks to employment, NamWater has an open public recruitment process at local and national level. Please refer to section 6.9 of the EIA for the impact assessment.
32 Context Section 5.2 mentions minutes of the meeting held on 26 April 2026.	Concern Please provide a copy of the minutes for review.	Please see Appendix B (this EIA Report)
33 Context Section 5.4 indicates a review period of 7 working days.	Concern Please revert to comment 1 regarding document review time and documents for review.	Thank you, the comment is noted, and it has been addressed.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
34 Context Section 6.1.	Concern Climate section extremely restricted and needs a full description to include Seasonal variation in Rainfall and precipitation - Rainfall patterns are extremely important in this area due to flash floods and rapid erosion. Wind, seasonal models as well as annual - where will the dust settle or be blown too - to use referenceable data sets with locations indicated.	Thank you, the comment/concern is noted, and it has been addressed; see Section 7.3.1.
35 Context Figure 6.1.	Concern Directional pictures are advisable for visual descriptions.	Thank you, the comment/concern is noted, and it has been addressed; see Figure 6.3.
36 Context Section 6.4	Concern i) No drainage description at all. Not visually presented (maps etc). ii) Lacking on-site topography description and drainage development - factors which impact run-off velocities, erosion etc. Will berm structures be erected to protect infrastructure etc - and this is only for the pipeline. What about the dam? Drainage and basin description, site topography is completely lacking. iii) Description is inaccurate and incompatible with geology map provided in the report. Description is not relevant to project area.	Thank you, the comment/concern is noted, and it has been addressed; see Section 6.4
37 Context Geology.	Concern i) Too vague - what is the geology of the dam area - since the project is in exploration phase, detailed geological data should already be available. What is the infiltration rate etc of the dam, losses of the dam? Or will the dam not be lined? Will it recharge the groundwater - we need to understand the geology to determine this. Or will the groundwater table in the river just be elevated and then become a pathway for contamination (mineral silt leaching during operation)? These are aspects which are not addressed and geology not sufficiently described. ii) Cannot delink geology and hydrogeology due to infiltration and fracturing etc.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> . Please see Appendix G of the above EIA and section 7.3.12 Thank you, the comment/concern is noted

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
38 Context Soil	Concern Soils of the various rivers not mentioned or explained / elaborated on. Description of Soil is for most of the EPL site. However, the dam and all of the infrastructure is proposed for construction within a dry riverbeds which present different soils compared to the rest of the project area. Is there an estimation of how deep the soil profiles are especially in the area where the dam will be constructed? In the EMP a soil depth of 15cm is mentioned. Is this the dry riverbed soil depth? Seems very shallow. No mention whatsoever is given to the identity of the soils (WRB classification)? Was soil analysis completed on the soils? If not, how can the nutrient status of the soil be commented on? Atlas of Namibia classifies the project area as having the dominant soil type of Eutric Skeletic Lithic Leptosol. Eutric inherently refers to fertile soil horizons contradicting the statement on the soils being nutrient-poor. Chemical characteristics of soils depend on parent material (predominantly), not only the local climate as implied. This leads the reader to believe that these soils are nutrient poor while this may not be the case.	Thank you, the comment/concern is noted, and it has been addressed; see section 6.6.
39 Context Section 6.5 states the following: "Haib River riparian habitat (ephemeral) and its tributaries are of special ecological importance due to its biotic richness, such as the larger protected trees". And:"...protected species are dominant and the Haib River is a sensitive habitat..."	Concern i) The sensitive zones in Figure 6.5 should be depicted in a polygon with related buffer zones indicated. ii) The identification and classification of critical habitat is paramount to the project and will further guide environmental assessment and information gathering. IFC and the equator principle have specific assessment and data gathering requirement which need to be adhered to during the environmental assessment. It is not an aspect which can be left for later or something that is strived to, since then, the critical habitat may already have been altered and impacted. iii) The proposed storage dam is located in a tributary of the Haib River, therefore according to the statement it should also be a sensitive /special ecological area. iv) No off-sets have been even mentioned in the environmental management plan for the modification of this 160 ha.	i and iii) Please see Appendix C of the above EIA. i and iii) Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix D of the above EIA. ii)Thank you, the comment/concern is noted iv) Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL MANAGEMENT PLAN 20 July 2026</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
40 Context On page 54 the report states the following: “The proposed Water Storage Dam area occurs within a rocky drainage line habitat and supports limited woody vegetation with only six trees and shrubs recorded in the footprint.”	Concern It is recorded here that 6 trees and shrubs are located in 160 ha. Please see the open-source satellite image (dated 2023) indicating more than 6 trees and shrubs in an area of approximately 5 ha located within the proposed dam footprint. 	Thank you, the comment/concern is noted, and it has been addressed; Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Section 6.7.2.
41 Context Section 6.9.1 states: “River. The total water use from this water supply system has increased over the years and is currently at the 2024 development level, already slightly exceeding the historic firm yield of about 3 300 Mm³/a for the ORP system. Further increases in the total water demand imposed on this system will reduce the	Concern The data collected in 2024 already indicates a concern related to the water use. This data was collected at a time in Namibian which sees the implementation of a new water act and numerous applications for abstraction from the Orange River. The applications include increased allocation amounts as well as new allocations. The concern is that there may be up to 30Mm³ not included in the consideration already between Blouputs and the abstraction point. What amount was this?	Thank you, the comment/concern is noted. The impacts on the assurance of supply are related to the scenario of continuous supply which is not being pursued in the application. Surplus flows are thus being pursued to avoid impacts. See section 6.9.11 in the EIA

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
assurance of water supply to the existing users."		
42 Context Page 61 indicated that ORASECOM has included some water requirements for the future Haib mine.	Concern What amount was this?	The amount varied across years and are listed in the WRWD study. Please note only one of the studies was done by ORASECOM the others by DWS RSA and also by combined Namibia-RSA studies. These included the following: LORMS Study 2005- 30 Mm3/a Orange Recon Study 2014- 3Mm/3 ORASECOM IWRMP 2020- 6 Mm3/a NVD Study 2020- 4-9.8 Mm3/a Orange AQA 2024- 6Mm3/a See Appendix F of the EIA
43 Context Section 6.9.1.1 States:". River. • If the water required for the Haib Mine is supplied from the ORP (i.e. relying on releases from the Gariep and Vanderkloof dams), the number of years with restrictions increased from 7 (without Haib Mine) to 9 (out of the 85 years assessed).	Concern Quantify small in volume of water and in relation to the available resource. Different operators require different volumes throughout the year. The pattern of water demand is important too.	Thank you, the comment/concern is noted. This has been included in the WRWD study under Figure 4-21.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
When water is supplied from the ORP at the 2024 development level, it will thus impact the assurance of supply to other users. This impact is however relatively small."		
44 Context Page 62 stated that abstraction is possible during high-flow periods.	Concern The lower Orange River is regulated and dependant on water release from South Africa. In the past operators had to desperately request water releases during peak cultivation times. How will release requests be timed as not to impact on higher volume requirements at other times from farmers? Is there then a possibility that RSA will be continually requested to release water for "surplus" flow?	The minimum flow requirements at Blouputs represent the timing of release requests. The minimum flows ensure South Africa does not have to be requested to release water. See section 6.9.1.1 of the EIA and Appendix F.
45 Context Page 62 mentioned EWR.	Concern Please add to the abbreviation list.	Thank you, the comment/concern is noted and has been addressed.
46 Context On page 66 the report states: "Note the analysis above are ongoing as part of the studies to assess the feasibility of the mine project."	Concern We need to have the final document to review - also for the abstraction EIA - since the entire report is related to the abstraction.	Thank you, the comment/concern is noted and has been addressed. See Appendix F.
47 Context	Concern	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Section 6.10. Air Quality.	Was consideration given to the dust from the tailings (which may be toxic) being blown into the storage facility? Long term weather data should be used. Locations of the wind data for monitoring should be provided and the data referenceable.	<i>PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix H and section 6.11 and 7.3.13
48 Context Page 71 states: "the absence of strong winds".	Concern No wind data was included in the report and preliminary view of the Air quality assessment indicates unreferenced wind data of a short duration. Even so, the data (windspeeds) indicates that at times there are "near gale" winds (as per the Beaufort scale use as our reference).	Thank you, the comment/concern is noted and has been addressed. See Appendix H and section 6.11 and 7.3.11 Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix H and section 6.11 and 7.3.13
49 Context Section 6.11.	Concern i) Not all abbreviations included in list. ii) The recharge rate is comparable to rates calculated in similar environments within Namibia and South Africa is stated. And what is the recharge rate when the valley above it is saturated with a dam? ii) How many boreholes are in the zone of influence? iii) Please provide the zone of influence for the dam. iv) Inconsistency related to the evaporation rates throughout the document. v) It is mentioned that the regional aquifers likely experience low interconnectivity due to the dominance of fractured rock aquifers. Despite this, the groundwater is discussed very broadly addressing the Orange Basin and the Fish River Basin collectively as the Orange-Fish River Basin. It would be preferential to discuss the groundwater on a local scale and consider the impacts of the surface water dam/infrastructure on the discussed local hydrogeological features.	Thank you, the comment/concern is noted and has been addressed. Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See appendix G and section 6.10
50 Context Section 6.12.	Concern	Thank you, the comment/concern is noted. Advice from the archaeologist was that for the sake of protection of these

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	Please indicate the mapped resources on a map in the report for reference. These need to be in the EIA and in relation with the infrastructure.	features a map should not be provided in the EIA. The coordinates are provided in the specialist study. See Appendix G.
51 Context Section 7.3.3 States: "Although physical infrastructure will be developed, this will likely not restrict movement of local communities and wildlife movement across the terrain."	Concern The washes and rivers are important ecological movement corridors for wildlife. How is building a dam not going to restrict movement?	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix D Terrestrial specialist report. The off channel storage dam was not included as a notable restriction to movement this however was included as an aspect to manage within the EMP.
52 Context Section 7.3.4.	Concern i) How will the flank wall affect the drainage and river morphology? ii) Where will the sand required for the construction bed of the pipeline come from? Will it be the river itself - and in that case how will that impact the drainage pattern of the river?	Thank you, the comment/concern is noted and has been addressed. Please see Appendix K of the EIA which through specialist opinion addresses these concerns. Also see Table 3-3 in the EMP and section 4.3.1 in the EIA.
53 Context Section 7.3.5 (Geology) states: No impacts on geology are anticipated to occur.	Concern Will the dam be lined or what will the infiltration rate be? How deep will construction be conducted for infrastructure development? Will blasting be required for the dam wall construction - none of these were mentioned. It is doubtful that there will be "no impact".	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the comment/concern is noted and has been addressed The dam infiltration is modelled under Appendix G. Please also see section 7.3.5. Please note that the Project is currently in the Pre-Feasibility phase, whereby the

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		feasibility of the Project is being defined through ongoing investigations and analyses.
54 Context Section 7.3.6.	Concern i) The impact of the storage dam on the soil is not mentioned. Neither the soil of the Haib River. It is assumed that the construction of this dam will surely contribute to some form of physical soil alteration during aggregate sourcing and fertile topsoil will be lost / stripped for the construction of the dam wall / pipeline. Chemical alteration due to the permanent covering of soils with water must be considered. ii) During decommissioning of the dam, considering potential accumulation of mine related contaminants in the surface dam itself, possibly resulting in soil contamination? No clarity is given on the decommissioning plan of the storage dam. Will the dam water be left to evaporate? (leaving contaminated sediment). Will it be drained, draining the water into the Orange River? iii) Decommissioning soil erosion impacts is stated to be the same as that of the construction phase. How is this possible after a dam is decommissioned?	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> i) Thank you, the comment/concern is noted and addressed. Please see section 4.5.3. ii) Although See Appendix O iii) Decommissioning is reverse construction including demolition and deconstruction resulting in destabilisation of soils. As a result the risk of erosion are very similar.
55 Context Section 7.3.7.	Concern i) In the report the sensitivity of the washes is mentioned, however a major miss here is that rivers and washes are wildlife corridors to the Orange River - especially in this area. The alteration of the patterns and impact on a portion of possible critical habitat is not assessed. ii) Impacts on birds and especially endangered species not sufficiently described and assessed. It becomes especially important to note that the alternative powerline designs may also vary in impact significance. No assessment in this regard was conducted and even mentioned. In fact, a one liner here indicates a low significance - how was this determined? iii) A new habitat will be created with the construction of a dam – the impact was not mentioned or fully developed. iv) The sensitive habitat and determination of the critical habitat needs to be included in the impact rating to be properly quantified. v) Decommissioning will have a significant and different impact - how will the storage facility be decommissioned.	Thank you, the comment is noted and has been addressed. i, ii, iv) Please refer to Appendix C. Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> iii, v) Please refer to Appendix D and O. The decommissioning phase is less clear at this point for the off channel storage dam and will be further explored through the Closure Planning for the proposed mine. Please note that the Project is currently in the Pre-Feasibility phase, whereby the feasibility of the Project is being defined

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		through ongoing investigations and analyses.
56 Context Section 7.3.9.	Concern i) Discussion of flank wall during flood events? ii) No mention of how the hydrology of the river, which will be dammed, may be affected, iii) Flow affects hydrology - deposition and erosion - this is an operational phase impact not mentioned.	Thank you, the comment is noted and has been addressed. See Section 4.1 in the EIA. See Section 7.3.9.1 See Appendix K.
57 Context Section 7.3.9.2.	Concern i) No indication is given on how the Proponent will be regulated in their abstraction. This system should be clearly indicated since failure in operations will have catastrophic results. ii) As mentioned before: Between Blouputs and the abstraction point there are abstraction applications possibly not included in the report since these licenses have not yet been processed. iii) There is no assessment of the ecological impacts (especially considering the RAMSAR site) due to over abstraction during the operational phase.	Thank you, the comment is noted and these aspects have been brought out clearer in the EIA and EMP. i)See section 4.2.5 of the EMP ii)See section 6.9.1.1 of the EIA iii)See section 7.3.9.2 of the EIA
58 Context Section 7.3.10.	Concern Mitigation is not mentioned or explained and neither is the impact on the vegetation no included. For example – what is the expected dust settlement / fallout area for the dam wall construction and will this impact the sensitive Haib River vegetation as mentioned? – Not mentioned in Flora/Fauna either.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See section 7.3.7 and Appendix D
59 Context Section 7.3.11.	Concern i) What activities will be conducted in the bedrock - excavations and blasting? ii) Vibration not assessed. Neither included in the fauna flora and how vibration and noise could affect sensitive species.	i)See section 7.3.5 ii)See Appendix D where this consideration has been attended to.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
60 Context 7.3.12 Hydrogeology.	Concern The section does not sufficiently address the construction of the surface water dam in the riverbed which has an established underground channel - how will this not have a significant impact on groundwater? The geology was not sufficiently described to be able to assess this impact - in terms of fractures, faults etc. In addition, no boreholes are indicated anywhere. The mine is in the exploration phase which should already have a very detailed description of the geology in the area, with many boreholes already drilled.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the comment is noted and has been addressed in Appendix G and under section 7.3.12 and 6.10
61 Context 7.3.13 Archaeology.	Concern i) Indicate these areas on a map in the ESIA itself and the EMP - areas to avoid. ii) Not all abbreviations included in the abbreviation list.	Thank you, the comment is noted. i) Advice from the archaeologist was that for the sake of protection of these features a map should not be provided in the EIA. The coordinates are provided in the specialist study in Appendix G. ii) Addressed
62 Context Section 7.3.14.	Concern i) Social aspects on qualitative value not assessed or mentioned at all in the report. ii) Baseline health conditions not included and linked to water quality. The baseline is important. If the storage dam becomes contaminated due to hydrogeological connection with the pollution plume of the tailings facility – how will this impact groundwater of the area? What happens if contamination due to overflow occurs into the Orange River. iii) Local skilled labour is scarce and no mention is made of the fact that skilled labour could be taken from existing operations and causing a skill shortage due to the structural unemployment.	iii) NamWater has an open public recruitment process at local and national level. Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the comment is noted. i) Please see Appendix M ii) Please see Appendix N and Appendix G
Namibia Grape Company on the 22 May 2026		

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
63 Context Pumps for abstraction of water from the Orange River.	Concern Will the pumps use for extraction of water and water meters be calibrated? Please provide proof of calibration.	Thank you, the comment is noted and the requirement for calibration has been specified in the EMP.
Orange River Vineyards Investments on the 20 May 2026. Namibian Grape Growers Association on the 21 May 2026. Solar Grapes on the 21 May 2026.		
	63 Overall Questions: i) Will the proponent request water to be released from SA, during multiple and consecutive years of drought? To ensure they can have surplus flow? And when will this be timed for? ii) Will the pumps be suitably scaled to allow for shorter abstraction period (to achieve the required volume) and was this consideration included anywhere as an alternative etc.	Thank you, the comment is noted and addressed in Appendix F Addendum to the WRWD Study.
Orange River Vineyards Investments on the 20 May 2026. Namibian Grape Growers Association on the 21 May 2026. SONOP Farming on the 21 May 2026. Noordoewer Guesthouse/ Gastehuis on the 21 May 2026. Amanzi Trails River Adventures on the 21 May 2026. Karas Date Farming (PTY) LTD on the 9 June 2026.		
1 Context Figure 1-1.	Concern i) Please include a key / legend to the map.	Thank you, the comment is noted and addressed
2 Context Page 15 Permitting.	Concern i) No mention of listed activities related to fuel storage (authorisation of MIME and MEFT), also no description of fuel to be used on site at construction camp etc.	Please note that the Project is currently in the Pre-Feasibility phase, whereby the feasibility of the Project is being defined

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	ii) No mention of blasting authorisations and requirements. Also not included in EIA description or proper assessment on possible impacts. iii) Consultation with regulatory air traffic authorities prior to the establishment of the power line will be advantageous.	through ongoing investigations and analyses. i) Please see Table 3-3 in the EMP ii) See section 7.3.5 in the EIA iii) Thank you, the comment is noted
3 Context Page 15 and 16.	Concern i) A waste management plan should be drafted for the construction phase and should include construction waste generated, training, practical measures for remote waste handling. There will, for example, be a ton of cement bags etc. What will happen with sewage waste - how many people will build the dam wall? it will provide an indication of sewerage requirements – This should be included in the EIA /EMP. ii) The EMP states “Prohibit the burning of waste material.” Preliminary screening of the Aquatic assessment refers to the use of an incinerator. Nothing included in the EIA about this. Documents do not seem to speak to each other. Clarity to be provided on waste management, storage and handling to be provided.	i) Thank you, the comment is noted and addressed in the EMP ii) Thank you, the comment is noted
4 Context Page 16, Material sources.	Concern Include that the activity triggers resources extraction and that the construction activities requiring material for the pipeline and storage dam construction may only be taken from an appropriately licensed (ECC and MAFWLR) area. MAFWLR issues sand mining licenses when sand is removed from rivers. This issue was not included in the EIA report either.	Thank you, the comment is noted and addressed Please see section 4.3.1 Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Please see section 4.5.3
5 Context	Concern i) The aspects were not sufficiently addressed in the EIA and impacts and mitigation therefor also insufficient.	Thank you, the comment is noted and addressed i) See section 6.4

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Page 16, Topography and drainage.	ii) It is stated: "Separate clean and dirty water and stabilise discharge points" How will clean and dirty drainage water be separated and what is defined as dirty water? No mention of these structures and it is assumed that this is part of the mining operations – which was not available for review yet. Pollution of the dam will have long term effects and responsibilities. iii) How will NamWater manage the risk related to closure and or contamination?	ii) See section 4.2.1 of the EMP iii) Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See Appendix O
6 Context Page 17, Hazardous Materials Management,	Concern It is stated: "Restrict the mixing of concrete and the cleaning of mixing equipment to lined or impermeable surfaces." Will this be done for the surface dam construction as well? How will this be enforced?	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Please see the actions proposed under the EMP
7 Context Page 17 Surface water – quality. Pollution and contamination of surface water and the surrounding environment.	Concern i) It is stated: "Install and maintain silt fences and settlement ponds downstream of disturbed areas." Please clarify where will this be in the rivers and what are the dimensions since not included in the EIA. Is this in the Orange River as well? ii) Chemical storage MSDS should be included and referred to? Use of cement and related pollution risk - bags etc, Physical pollution of construction works, fuel storage restrictions SANS and MIME) all not included. iii) Will a register of pollutants be kept? iv) What happens in the case of a flash flood etc (considering the recent climatic event which caused a lot of infrastructure damage in the region).	Thank you, the comment is noted and addressed i) The principal is to manage the stormwater before it gets to the Orange river. The sizes cannot be confirmed until PFS designs of infrastructure are final as this informs the hydrological input for the SWMP. ii) Please see EMP for amendment iii) Noted- please see EMP for amendment iv) All infrastructure and storm water management plans have been designed inclusive of local climatic risks such as flash floods. Stormwater infrastructure will be sized for the 50-year return period storm events; this is standard practice. Larger events will still have flash floods.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
8 Context Page 18, Surface water – quantity. Reduction in surface water quantity.	Concern i) Please share the strategy for the construction use as it is listed here - so stakeholders can review and plan as well. - for all mitigation mentioned here. Please stage this in the construction phase since the timing of the construction phase for the surface water infrastructure components was not indicated in this report or the EMP. ii) No mention of how water will be abstracted for the construction phase will be achieved. Not in this EMP or the EIA.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See section 4.6.2, 6.9.2 and 7.3.9.2 See section 4.6.2.1
9 Context Page 18 Contamination of groundwater resources.	Concern i) What will happen with sewage – no description in the EIA or this report on where the sewage will go, of over 3000 workers. Will there be chemical toilets remotely? Or septic tanks or French drains - if so, where are the boreholes located in the area to note that buffer zones etc? ii) How will possibly blasting affect boreholes / groundwater infrastructure and how will this be managed?	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> i) Noted and amended. See section 4.7.5 and 4.7.6 ii) Please see Appendix J
10 Context Page 19 Habitat loss, fauna injury and protected flora removal.	Concern i) Include a map here indicating the sensitive areas referred to. If no map is available - include a provision to determine sensitive areas and to delineate these as part of the construction EMP. Ecological buffer zones should be included.	Thank you, the comment is noted and addressed See construction phase EMP
11 Context Page 20 Biodiversity – Avifauna.	Concern Information related to the critically endangered bird species not adequately included in the EIA report with no visual representation of related habitats etc. Avoidance and mitigation measure should be based on such information. Also, construction activities not well defined in the EIA. Will there be blasting and excavations to construct the dam wall? Where and in what relation to the sensitive habitats are these. This is also very important considering the vegetation clearance associated with the servitudes of the power line, pipeline and road. Where are these in relation to the important bird species?	Thank you, the comment is noted Please see amended EMP and updated Appendix C.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
12 Context Page 21 Noise - No mitigations required.	Concern i) Vibration / blasting and effects on the wildlife? Not considered. ii) Noise, vibration and blasting will have more bearing during the construction phase than the operational phase.	i and ii) See Appendix C where this consideration has been attended to.
13 Context Page 21 Visual aesthetics management.	Concern The dam will create an abrupt, unnatural vertical shift in the landscape's elevation. It will create a dramatic visual impact - Visual receptors now also refer to people using open-source satellite imagery. Even if there is little mitigation, the impact should be properly acknowledged and mitigation related to cleanliness, good housekeeping, and Health and Safety etc be considered.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the comment is noted and addressed in the EMP
14 Context Page 21 Heritage Resource Management.	Concern Heritage is of national importance, map and buffer zones to be included in the EMP especially if located within the area to be flooded.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> See appendix L- no heritage features identified in the inundation area. Advice from the archaeologist was that for the sake of protection of these features a map should not be provided in the EIA. The coordinates are provided in the specialist study within the appendices.
15 Context Page 22 Social and Economic Performance.	Concern i) Complete aspects omitted in EIA and no mitigation therefore provided in the EMP. Please refer to comments of impact section and include related mitigation measures in EMP.	Thank you, the comment is noted.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
16 Context General Construction Phase comment.	Concern Road and traffic, fire, vibration social (demographic profile, feelings and aspirations about the project, health and safety etc), economic, cumulative and planning aspects not included in the construction phase activities mitigation.	Thank you, the comment is noted and addressed. See amended EMP.
17 Context Page 22 Operational phase.	Concern Electromagnetic fields of Power line not addressed in EIA or EMP.	Thank you, the comment is noted and addressed. See section 7.3.7 of the EIA
18 Context Page 23 Topography.	Concern i) When will the water be pumped into the dam, during construction or operation? The dam will continue to maintain an altered drainage. Details in EIA insufficient to consider aspects such as seepage etc. Questions to be answered include: rate of sedimentation of the dam, what will be the effect of the loosened material in river and wash during rainfall event. How will the completed pipeline in the river channel affect the drainage - How will this change erosion and deposition as aspects such as deepening the riverbed/ wash, narrowing the washes / channel, and eroding river banks?	For aspects related to river banks please see Appendix K of the NamWater EIA. Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Water will be pumped into the dam during the operational phase of the mine by NamWater. Risks of seepage and drainage included in Appendix G and section 6.9
19 Context Page 24 Reduced surface water availability.	Concern Should seepage and groundwater recharge as well as evaporation losses no be addressed and possible mitigation considered, or at least discussed? Deep and narrow or division into smaller dams for reduced surface area? Wind abatement structures etc These are all alternatives not discussed in the EIA or the EMP. Design will affect operations.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Risks of seepage and recharge are included in Appendix G and section 6.9.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		Aspects of evaporation loss via the dam has been considered in the dam sizing. The Storage Dam features relatively favourable evaporation characteristics, being relatively deep in a narrow gorge. The surrounding mountains are expected to limit wind evaporative effects. These favourable characteristics, combined with expected large fluctuations in water levels throughout the year preclude the use of evaporation reduction measures.
20 Context Page 24 Habitat loss, injuries or fatalities of terrestrial biodiversity.	Concern Alternative line configuration and pole structures not included in EIA. No mention of the aftercare for various servitudes (power line, pipeline and road - no mention of these aspects in the EIA, therefore how assessed?). Where will these servitudes be? Alignment not included in EIA. Keeping in mind that a 18 m servitude is required for a 33 kV line (this info as stated by us since not in the report). Who will be responsible for the power line maintenance? NamWater or the Mine? NamPower? No clear communication or plans included.	These aspects are included in the Terrestrial Biodiversity Study under Appendix C. The concerns are noted and the EMP has been for the construction phase specifically.
21 Context Page 25 Biodiversity – aquatic ecosystems.	Concern The dam will create an entire new ecosystem. This aspect needs to be included and how management of this ecosystem will be maintained.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the comment is noted and addressed. See the amended EMP under the relevant section
22 Context Page 25 Land Use and Land Capability.	Concern Land capability and the land use will have a definite change with the successful operations of the dam. Enhancement measures to be included as well as mitigation to safeguard changed potential in light of possible groundwater recharge etc.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		Thank you, the comment is noted and addressed. See section 6.2 in the EIA.
23 Context Page 25 Visual - States no mitigation available.	Concern There once was a valley, it changes with construction works, a dam wall being created, people and worker camps, machines. Then once done, water covers the valley area and creates a completely difference landscape. This to be added to the EIA. There are mitigation measures to be included: keeping a site clean and tidy, conducting regular maintenance of the pipeline and related infrastructure - continue with rehabilitation efforts in the servitude and where topsoil was placed.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the comment is noted and addressed. See amended EMP under visual aspects.
24 Context General Comment Operational Phase EMP.	Concern i) Groundwater and impacts thereon due to recharge of the dam not included. Yet in the monitoring report, requirements are made about boreholes monitoring. Why not assessed or included in the EIA/EMP? ii) In general, the monitoring component is not well linked to the EMP with the monitoring component including aspects not discussed in the EMP and EIA.	Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> i) Thank you, the comment is noted and addressed. See appendix G and section 7.3.12 in the EIA ii) Thank you, the comment is noted and addressed. This has been improved in the EMP
SONOP Farming on the 21 May 2026. Noordoewer Guesthouse/ Gastehuis on the 21 May 2026. Amanzi Trails River on the 21 May 2026.		
	As stakeholders, we ask for input on these issues presented prior to the project's commencement.	Confirmed. This is the process.
Achill Island Investments (PTY) Ltd on the 22 May 2026		
	Achill Island Investments Pty Ltd farms table grapes and dates in Aussenkehr. We farm 694 hectares of table grapes and 246 hectares of dates, making us the largest table grape and date producer (once our dates trees reach maturity) in Namibia. Once our investment reaches full bearing, we will produce approximately 11.25 million kilograms of grapes and 3 million kilograms of dates annually, the majority of which is exported, earning	Thank you for the information and the concern and risk is of critical importance. The Draft EMP was available the same time as the Draft EIA.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
foreign currency for Namibia. At peak season we employ approximately 4,000 people in and around Aussenkehr. Our farm — and many others in the Aussenkehr valley — is entirely and irreversibly dependent on a continuous and reliable supply of quality water from the Orange River. There is no alternative source. The photograph below was taken in December 2016, when the Orange River ran dry at Aussenkehr. It was resolved within a week due to a management intervention upstream, but it provides an enduring reminder that the Orange River is a finite resource and that any failure of supply, however brief, poses an existential threat to our operations, our employees, and the broader Aussenkehr farming community. We have reviewed a document set exceeding 1,200 pages. We apologise for the brief delay in this submission; we request that the comment period be formally extended to allow adequate engagement with the revised documentation, including the WRWD addendum and the draft EMP, which were circulated late in the process. 		Any documentation provided after the review process started is a direct result of comments received from stakeholders and was done so to ensure meaningful consultation (i.e. the WRDM addendum) and thus were provided early in the process and not late.
Our Position We are not opposed to the Haib Copper Mine or to the abstraction of water to support it. Namibia needs investment, and we recognise the economic significance of the project. However, we cannot support this application as it currently stands. Our support is conditional on a Water Abstraction Management Protocol being finalised and agreed with downstream users — including ourselves — before any Environmental Clearance Certificate is granted. The Protocol is referenced in the draft EMP as the legally binding operational instrument governing when and how abstraction will occur. It has not been made available. Without it, we cannot assess whether our water security will be protected, and neither, we respectfully submit, can the		The Project is at an advanced conceptual stage, and pre-feasibility designs have been utilised to simulate and measure the potential impacts. The water management philosophy has been outlined in the EIA and the Water Abstraction Framework which forms the basis of the Water Abstraction Protocol included in the EMP. This Framework is

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	Ministry. The concerns set out below explain why this Protocol is essential and why the current application contains material deficiencies that must be addressed before approval.	informed by specialist studies and discussions with NamWater on practicality and is deemed sufficient to simulate and measure the potential impacts as is required for the EIA process. See Section 4.2.5 of the EMP.
	1. Process: The Late Introduction of NamWater as Applicant Our understanding of IFC Performance Standard 1 is that the responsibility for establishing and maintaining the ESIA process rests with the Applicant, who must ensure that Interested and Affected Parties have a genuine opportunity to engage. We have serious concerns on this front. We were informed only on 23 April 2026 — after the substantive public participation had already taken place — that NamWater had replaced Koryx Copper as the applicant for the water abstraction licence. This is a material change. NamWater is the entity that will hold the licence and bear legal responsibility for compliance with permit conditions. We had no opportunity to scrutinise NamWater's capacity, track record, or governance arrangements before engaging with this process. More significantly, the WRWD addendum (comment response #12) confirms that a Memorandum of Understanding between NamWater and Koryx Copper — governing the commercial and operational relationship between the licence holder and the mine — is 'currently under development.' As of the date of this submission, there is no signed agreement between these two entities. The Ministry cannot fully evaluate this ECC application when the fundamental contractual arrangements underpinning it do not yet exist. We also note the following: NamWater, as Applicant, has not attended any of the public participation meetings. We have never had an opportunity to meet the entity that will hold this licence. On 12 May 2026, the Environmental Assessment Practitioner (EAP) offered a follow-up meeting with us on water security matters. We accepted on 13 May 2026. We have received no response since. This is a failure of the consultation process and should be noted as such in the record.	The specific application has had the following directed public engagements and review periods: During August-November 2025 (Scoping Report) During April- June 2026 (Rev A EIA and appendices) During August 2026 (Rev B EIA and Appendices) NamWater was introduced to stakeholders as the applicant for the water abstraction activities in April 2026. Since then the application has been open to comment and review. The first draft of the EIA and appendices was out for review 6 May to 9 July 2026. Based on feedback it was decided that a second draft (incorporating all comments received) would be circulated for comment within August for an additional 2 weeks. The formal meeting to discuss water security matters is scheduled for the 12th August 2026 and includes key subject specialists and suitable representation from NamWater.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	2. The Water Abstraction Management Protocol Must Be Made Available The draft EMP (Operational Phase, Table 4-2) states that NamWater will 'Implement the Water Abstraction Management Protocol which guides periodic abstraction with explicit surplus-flow thresholds and enforce strict compliance with established protocols.' This Protocol is described as the operative document that will determine, on a day-to-day basis, whether abstraction is permitted or must cease. This document has not been shared with Interested and Affected Parties. For a downstream farming operation that is wholly dependent on the Orange River, this Protocol is the single most important document in the entire ESIA package. It will translate the hydrological modelling into enforceable operational rules. Without it, the assurances given in the EIA and WRWD are theoretical. We cannot assess whether our interests are protected, and we cannot give meaningful comment on this application, until we have seen it. We formally request that the draft Water Abstraction Management Protocol be released and that the comment period be extended to allow I&APs to respond to it.	A Water Abstraction Framework has been included in the updated EMP. The primary mechanism stating that no abstraction should occur outside of flows which are classified as surplus. This classification is directly linked to independent (The Annual Operating Analysis by DWS SA). This principle will not change and is deemed sufficient to be able to guide abstraction as well as assess the probability of a risk of non-compliance. See Section 4.2.5 of the EMP and 7.3.9 of the EIA. A third review period is included under the process to ensure meaningful inputs are considered.
	3. Blouputs is the Wrong Gauging Point for the Abstraction Trigger The ESIA proposes to use the Blouputs gauging station (D8H014) — located in South Africa, upstream of the Namibian border — as the primary trigger point for determining when river flow is in 'surplus' and abstraction may proceed. We question whether this gives adequate protection to downstream Namibian users. Between Blouputs and the proposed abstraction point near Noordoewer, there are existing Namibian water users — irrigation schemes, domestic supply, and existing industry — whose abstraction is not captured in the minimum flow values set annually by South Africa's Department of Water and Sanitation (DWS). In periods of low flow and sustained high temperatures, consumption in this stretch can be materially greater than modelled. This is not a theoretical risk; we have observed it. The gauging station at Vioolsdrift Bridge (D8H009) is operational, closer to the abstraction point, and would provide a significantly more accurate reflection of flow conditions at the relevant location. We note that the draft EMP itself commits to installing flow monitors 'downstream in Noordoewer' — an implicit acknowledgement that Blouputs alone is insufficient. We ask that this commitment be formalised: the Vioolsdrift Bridge gauge (D8H009), or a new gauge at Noordoewer, should be designated as the primary operating trigger for abstraction decisions, and this should be a binding condition of any ECC.	The Blouputs gauging station (D8H014) is the accepted location used by DWA SA to assess the requirements for all downstream demands (users, losses & EWR) and trigger releases from Vanderkloof Dam if required. The operation and performance of the system is assessed and reconciled annually under the Annual Operating Analysis, which also includes consultations with water users in Namibia and RSA. These various aspects are assessed to confirm or adjust the minimum Blouputs Flows according to which the system is operated for the next year. The project can unfortunately not commit to dictate where DWS measures

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		flows and how DWS operates minimum flows. In the event of abnormally / sustained high temperatures, river flows drop due to the high losses, as noted. The Northern Cape division of DWS has a discretionary allowance which can be released from the upstream dams to increase flows in such instances. The assessments conducted to date have been based on following the existing system for the operation of the lower Orange River, namely determinative flows at Blouputs. The proposal is noted and NamWater is investigating the use of flow gauging closer to the mine site or Noordoewer / Vioolsdrift and linking the Blouputs minimum flows to this gauging location. Please note that currently the gauging of low flows at Blouputs are more accurate than the low flows measured at Vioolsdrift Bridge. The accuracy of measuring low flows at Vioolsdrift Bridge should be improved when using it for that purpose.
	4. The System is Already Under Stress — Recent Evidence Not Fully Reflected The WRWD confirms that the Orange River Project is already slightly over-utilised at the 2024 development level, with restrictions required in 8.2% of the years analysed — above the expected 5% threshold for a balanced system. We accept that the proposed surplus-flow-only pumping approach, combined with an off-channel storage dam, is designed to avoid exacerbating this position for downstream users. However, we have two specific concerns about the adequacy of the current analysis. First, the most recent DWS Annual Operating Analysis was completed in September 2025. The WRWD addendum notes that this report 'was expected to be released in March 2026 but is not yet available.' It has therefore not been incorporated into the ESIA. This is a material gap at a moment when the hydrological regime is actively changing. Second — and	The updated AOA 2025 is highly unlikely to change the abstraction strategy proposed as linked to minimum flows at Blouputs. The AOA will however inform the minimum flows at Blouputs which is what directly informs the abstraction strategy. When abstraction starts the appropriate low flows will be utilised and the 2025 AOA will be outdated.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	more immediately — the WRWD addendum (Figure 1-1) shows that the Sendelingsdrift gauging station, which is located downstream of the proposed abstraction point, recorded flows falling short of the Environmental Water Requirement in both 2024 and 2025. These are the most current measurements available. They indicate that the existing minimum flow thresholds, as currently set at Blouputs, are already proving insufficient to prevent EWR shortfalls in the lower Orange River in recent years — before any abstraction for the Haib Mine has begun. This recent observed data is not adequately reflected in the conclusions of the ESIA. We note that the Polihali Dam is expected to begin inundating this month (July 2026), commencing a transition that the WRWD itself predicts will increase system restriction frequency significantly by 2035. We are not suggesting this was unmodelled — the 2035 scenario is included in the WRWD. We are noting that the ECC decision is being made at precisely the moment this transition begins, and that the hydrological baseline is shifting under the process. Given this, we request that the September 2025 DWS operating analysis, once released, be incorporated into a revised assessment before any approval is granted.	The reduction in flow observed at Sendelingsdrift is observed- the driver of this drop is unclear however potentially as this is during summer that heatwaves resulted in increased evaporation and likely additional abstraction by users. Please note the establishment of minimum flows at Blouputs are determined based on the updated water use information obtain each year from the various countries, and using the WRPM to provide the simulated flow data at the different monitoring sites. These minimum flows are then first discussed with DWS (SA) and then presented to all the users and interested parties at the Stakeholder Operation Forum (SOF) meeting each year. All water users are urged to join this meeting (Namibia included). All comments received are investigated and further adjustments are made when required. The quantification of these flows are part of the formal process of updating the Annual Operating Analyses. DWS RSA is in the process to start with a study with the aim to implement Realtime monitoring and modelling of flows along the entire Orange River and the Vaal River downstream of Bloemhof Dam. This will further improve the accuracy of water supply in particular in the Lower Orange once installed.
5. Dam Break and Failure Consequence Analysis		Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	The project proposes the construction of a 25 Mm ³ off-channel storage dam upstream of Aussenkehr. This is a substantial impoundment. Its failure would pose a direct, severe, and potentially irreversible threat to our farm, our employees, and the downstream community. We have not been provided with any dam break or failure consequence analysis as part of this process. We regard this as a material omission and request that such an analysis be completed and shared with I&APs before any ECC is considered.	<i>PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> Thank you, the concern is noted and addressed through the development of a Dam Breach Analysis. See Section 7.3.10 of the EIA
	6. Water Rights Transparency The minimum flow values set at Blouputs are intended to satisfy all downstream requirements — water users, irrigation, domestic supply, environmental water requirements, and losses. A critical input to this determination is the total volume of water rights issued in Namibia along the Lower Orange River and the extent to which those rights are currently being exercised. We raised this in the public participation process (recorded as comment #13 in the WRWD addendum). The response acknowledged that the Namibian Ministry of Agriculture, Water and Land Reform does not release permit information to members of the public. We understand that policy. However, the consequence is that the ESIA modelling cannot capture the full gap between current actual usage and total entitled usage. Existing Namibian water right holders are entitled to increase their abstraction up to their licensed volumes at any time. If this occurs — particularly during low flow conditions — the minimum flow values at Blouputs may prove inadequate to protect all downstream users, independent of any Haib Mine abstraction. We request that the Ministry ensure this information is incorporated into the operational model before any ECC is granted.	This point largely rests on the regulator who is the custodian of this information. The information, which is unavailable to the public, is however considered through the allocation of minimum flows at Blouputs on an annual basis which is fully incorporated into the EIA assessment. As part of the Annual Operating Analysis the total permits issued by Namibian Ministry of Agriculture, Water and Land Reform are obtained and included in the modelling on an annual basis. Most of the time this is checked with some of the Namibia irrigators to obtain a better indication of how much of the total permitted volume is already in use for that particular year.
	Summary of Requests We request the following before any Environmental Clearance Certificate is granted: 1. A formal extension of the public comment period to allow adequate engagement with the full ESIA documentation. 2. Full disclosure of the draft Water Abstraction Management Protocol, with a dedicated comment period thereon, and mutually agreed conditions before finalisation. 3. Designation of the Violsdrift Bridge gauge (D8H009) or a gauge at Noordoewer as the operative abstraction trigger point, replacing Blouputs as the primary control point. 4. Incorporation of the September 2025 DWS Annual Operating Analysis and the 2024-2025	As described above As described above The project cannot control this as an Annual Operating Procedure of Department of Water and Sanitation SA. The project can however put in place measures to monitor flows and adaptively manage and mitigate impacts. As described above

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	Sendelingsdrift EWR shortfall data into a revised hydrological assessment. 5. A dam break and failure consequence analysis for the proposed 25 Mm³ off-channel storage dam. 6. Disclosure and modelling of existing Namibian water rights and current utilisation along the Lower Orange River. 7. Execution and publication of the Memorandum of Understanding between NamWater and Koryx Copper, with an opportunity for comment. 8. A formal meeting with NamWater as the licence applicant.	As described above Noted The MOU includes non-disclosure clauses and unfortunately cannot be shared Set for 12 August 2026.
	We are committed to engaging constructively in this process and we support the economic development that the Haib Copper Mine represents for Namibia and the //Karas Region. We wish to see this project proceed — but only on terms that provide our operations, and those of other downstream water users, with legally enforceable and technically robust protection. A mutually agreed Water Abstraction Management Protocol, developed with proper I&AP engagement, is the foundation on which that confidence can be built.	Thank you and well received
Namibia Nature Foundation on the 11 May 2026		
	NNF Inputs on the Proposed Haib Copper Project Development The Namibia Nature Foundation (NNF) appreciates the opportunity to provide comments on the Draft Environmental and Social Scoping Report for the proposed Haib Copper Project. While we recognise the potential economic benefits associated with employment, infrastructure development, and regional economic growth, we wish to raise the following concerns and recommendations for further consideration during the ESIA process:	Thank you. We appreciate and welcome the inputs and comments
	1. Water Resources and Water Security The project proposes an annual water demand of approximately 20 million cubic metres from the Orange River, which is a significant volume in an already water-scarce region. Greater clarity is required on: - The long-term sustainability of this water abstraction, particularly during drought periods. - Potential impacts on downstream water users, irrigation agriculture, ecosystems, and transboundary water obligations. - The cumulative impacts of this abstraction alongside other water users in the Orange River catchment.	The project abstraction protocol will target only periods of surplus flow (defined as flows above the licensed water users, ecological requirements and environmental losses). This will be supported by a 20Mm³ off channel storage dam. The analysis shows sufficient water is available during periods of surplus flow and thus limited impacts through effective

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		mitigation. This will be supported by ongoing impact monitoring. Cumulative impacts have been assessed and the availability of only surplus flows is a result.
2. Biodiversity and Ecosystem Protection The project area includes sensitive habitats such as the Haib and Volstruis river systems, Orange River riparian zones, rocky habitats, and bird movement corridors. Key concerns include: - Habitat destruction, fragmentation, and disturbance from the open pit, roads, waste rock dumps, processing plants, and associated infrastructure. - Potential impacts on endemic, protected, and conservation-sensitive species. - Increased risks of wildlife disturbance, mortality, and habitat displacement. Recommendation: - The need for clear biodiversity mitigation measures, habitat restoration commitments, and biodiversity offset considerations where unavoidable impacts remain.		The concerns are noted and have been considered in the EIA. The EMP includes specific measures for habitat restoration and biodiversity offsets where sensitive habitats are residually impacted
3. Tailings, Waste and Pollution Risks The proposed development includes tailings storage facilities, waste rock dumps, hazardous chemicals, and processing plants, which present significant environmental risks. Concerns include: - Potential seepage, contamination, and long-term pollution of soil, groundwater, and surface water. Recommendations: - Prepare and publicly disclose emergency response plans for spills, dam failures, fires, and hazardous incidents		Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> A dedicated hydrogeological specialist study was commissioned which investigates long term risks of Tailings and Waste. Prepare and publicly disclose emergency response plans has been included in the EMP as a condition of authorisation
4. Social and Community Impacts Although employment opportunities are acknowledged, the scale of the project may also introduce significant social pressures:		Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i>

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Key Concerns: - Influx of workers may place pressure on housing, health services, waste management, local infrastructure, and community safety. Recommendations: - A clear social management plan should be developed to address community wellbeing, social cohesion, and local service capacity.		The development of a targeted Influx Impact Mitigation Plan has been included as a condition in the EMP.
5. Cultural Heritage Protection The report identifies archaeological and heritage features in the broader area. Clarification is needed on: - Whether all heritage and culturally significant sites within the direct impact footprint have been identified. Recommendations: - Measures to protect graves, archaeological resources, and culturally important areas. - Inclusion of a clear chance-find procedure.		Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> The site has been subject to 4 investigations by a registered archaeologist. Which contributes to confidence that all heritage and culturally significant sites have been identified. Measures for protection of heritage resources, inclusive of chance find procedures has been included in the EMP.
6. Mine Closure, Rehabilitation, and Long-Term Liability Given the scale and duration of the project. Key recommendations: - Detailed closure and rehabilitation planning should be developed early in the ESIA process. - Progressive rehabilitation should be implemented during operations rather than only at closure. - Clear financial guarantees should be provided for closure, rehabilitation, long-term monitoring, and post-closure risk management. - The project should demonstrate how disturbed land will be restored to a safe and environmentally acceptable condition.		Please see <i>PROPOSED MINING ACTIVITIES FOR THE HAIB COPPER PROJECT Draft ENVIRONMENTAL IMPACT ASSESSMENT 20 July 2026</i> A Closure Framework has been developed for the PFS stage of the project and is included in the EIA Concurrent rehabilitation has been included as a condition in the EMP The closure framework includes a high level costing calculation that forms the basis of closure requirements. This is required to be updated at key phases of

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		project implementation to ensure sufficient provision is made. In agreement-in the EMP has been included the requirement for the development of Biodiversity management Plan, including Alien and Invasive Species Management and Biodiversity Offset Plan as well as a Rehabilitation, Decommissioning and Closure Plan. The latter plan will translate rehabilitation objectives into site-specific tasks with timelines and measurable acceptance criteria to achieve timely restoration of safe, stable, vegetated landforms; and plan and implement decommissioning and closure activities, including safe dismantling and removal of infrastructure, license/permit updates or surrender, financial provision, and post-closure monitoring, maintenance, and stakeholder engagement, to minimise residual environmental and social risks
	7. Community Participation and Transparency Meaningful stakeholder engagement must continue throughout the ESIA process. Recommendations include: • Ensuring affected communities receive information in accessible formats and appropriate languages. • Transparent disclosure of specialist studies and impact findings. • Establishment of an accessible grievance mechanism. • Ongoing consultation beyond the scoping phase.	Ongoing consultation has been facilitated. A second round of notification, public meetings, focus groups and reviews has been initiated to maximise contributions. A comprehensive and accessible grievance redress mechanism is currently under development and will be in place by Q4 2026. It will be accessible at various sites within the project area. The current grievance mechanism is available

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		at https://koryxcopper.com/grievance-mechanism/
Overall recommendation Given the scale and long-term implications of the proposed Haib Copper Project, we recommend that the ESIA comprehensively assess cumulative environmental and social impacts, demonstrate robust mitigation measures, and ensure that community rights, environmental sustainability, and long-term accountability remain central to project decision-making.		Thank you, the feedback and considerations, are well noted and incorporated into the outputs.
Gariep Watch (Letter dated 14 May 2026)		
Letter received		1. Thank you for the link to additional data on water quality in the system. I have shared the concerns about drop in water quality during system flushes past the process team who are considering the impacts. 2. The abstraction quantum is maximum 20 million m³/a (not 30 Million m³/a as stated in the letter). The abstraction period will be guided by flow rates in the river at the given period and thus abstraction rules informed by active monitoring- and so likely between January to September but it will depend on real time flows. 3. To confirm that recycling and reuse of water forms a key component of the water balance on site although agreed the mention of infrastructure associated with the key mine layout such as stormwater management and return water dams etc are limited in the description. These are absolutely included in the design. To confirm no discharge to the Orange River is planned

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		for the project as water availability is a key concern and discharge would be counter-productive and so major focus on reuse and recycling. 4. I want to be clear that the project includes 2 applications for ECC- i) the Water Abstraction application by NamWater which will support the mine project which I have shared and ii) the Haib Mine application by Haib Minerals.
	Mining and beneficiation activities near the Orange River may pose a significant risk to water quality via airborne dust, surface flow and subsurface flow.	These contaminant pathways have been identified and included in the EIA terms of Reference. Detailed hydrogeological specialist study inclusive of geochemical analysis (both static and kinetic testing) has been completed. Results are available in the Haib Mine EIA and annexures and show across temporal scenarios, pre mitigation, that migratory plumes are expected with local (on site) migration of low quality leachate. Low quality leachate is comparable to background ground water quality and thus impact of the on-site aquifers expected to be limited. Migration occurs towards the Orange River however is predicted to remain on site prior to mitigation. These expected results are to be further mitigated through appropriate engineering interventions supported by extensive monitoring programmes. Air Dispersion Modelling of PM2.5 and PM10 was undertaken across scenarios

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
		and until a deposition sample can be acquired it is difficult to assess the specific risk however air quality specialists indicate the risk of deposition of dust contaminating the Orange River to be negligible. Ongoing monitoring however is included in the EMP.

APPENDIX F.3 DETAILED ISSUES, COMMENTS AND RESPONSES REGISTER

Summary of Comments

Summary of Comment
Governance of the Water Abstraction Protocol (WAP)
Concerns over the requirement for legal mechanisms to govern water abstraction. Requests the Water Abstraction Protocol (WAP) be a standalone, auditable document formally referenced in the ECC, not just a subsection of the EMP, with its own monitoring, reporting, and enforcement pathway
Stakeholder participation in WAP finalisation and operation
Requests for a defined role for downstream users to review/comment on the draft WAP before finalisation and to participate in ongoing joint monitoring/management.
Reliability of Blouputs minimum flow data
Concerns over inconsistency/uncertainty in data underpinning the Blouputs minimum flow Concerned that minimum flows are managed by South Africa; and thus lack of control. Concerns over the parties responsible for abstraction.
International water allocations, latest agreements, permit allocations vs Namibian Quota
Seeking the exact formal allocation from South Africa to Namibia and clarification on any newer binding agreements; notes concern that the system is already under pressure. Requests confirmation whether the MAFWLR-approved permits exceed Namibia's legal entitlement and cautions that figures indicate possible over-allocation/shortage.

APPENDIX F.4 COMMENTS AND RESPONSE REGISTER-

Proposed HAIB MINE APPLICATION FOR ECC

Comments received 7 August to 24 August 2026

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
Achill Island Investments (PTY) Ltd on 17 August 2026		
	Thank you for the Addendum to the WRWD Study (6 August 2026), the Draft EMP Rev B, and the NamWater Draft EIA Rev B, all issued in the days following our letter of 4 August 2026. We want to acknowledge, upfront, that they represent real progress on	Noted with thanks.

Context provided by stakeholder	Comment provided by stakeholder	Response to comment
	some of the points we raised. However, on the issues that matter most to our ability to support these applications, the revisions do not go far enough. We are submitting these further comments within the current Round 2 EIA and EMP Review Period (6–21 August 2026).	
1. The Water Abstraction Protocol Should Be a Standalone, Independently Operated Document	The new Water Abstraction Framework in EMP Section 4.2.5 is a useful description of the intended control logic, but it is a subsection of the EMP. The Protocol itself is still described as something to be “finalised to include operational details and key roles and responsibilities within NamWater prior to any abstraction commencing” (EMP Section 4.2.1). That leaves it as an internal NamWater commitment folded into general EMP compliance, rather than a discrete, controlled operating document with its own monitoring, reporting and enforcement pathway that MEFT and downstream users can track directly. We ask that the Protocol be issued as a stand-alone instrument, formally referenced in the ECC, capable of being audited and enforced independently of the EMP as a whole.	Thank you, the comment/concern is noted and the original request was addressed through including this additional detail in the EMP. The principles of the Water Abstraction Protocol (WAP) (termed in the EMP as a framework) are included in the EMP under Section 4.2.5. A “final” WAP document can only be generated once the supply scheme is finalised. The detailed operational settings depend on final supply scheme design and MAFWLR’s site specific operating guidance. Finalising these details at this stage prematurely risks misalignment. The EMP secures the binding principles now. The WAP will translate them into auditable operating rules before any abstraction can take place (included in the EMP). The WAP will furthermore be a living document that will require periodic updates based on updated flow requirements, operational clarity and adaptive management within the fundamental principles outlined in the EMP. It is important to remember is that the key activity proposed through the application for ECC is to abstract ~21 Million m³/a from the Orange River. Towards mitigating impacts abstraction on downstream users (including your organisation), the EMP states that no abstraction may take place outside periods classified as “Surplus” flow. Surplus flow is classified as flows that exceed the downstream requirements (inclusive of users, water loss and ecological requirements). The EMP takes this one step further to describe “HOW” this abstraction philosophy will be implemented based on direct linkages to annually updated operating analysis of the Orange River. All of this is captured in the EMP which, if approved, compliance to the EMP is a condition of the ECC. The EMP is therefore a legally binding document of
2. Downstream Users Still Have No Role in Finalising or Managing the Protocol	The same EMP provision (Section 4.2.1) describes finalisation of the Protocol as a process internal to NamWater. No mechanism is proposed for downstream users to review or comment on its terms before it is finalised, nor for any ongoing role once it is operational. This was one of our core requests in both our May and 4 August submissions and remains	

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	unaddressed. We again ask for a defined role for downstream users: at minimum, an opportunity to review and comment on the draft Protocol before it is finalised, and an agreed mechanism — such as a joint monitoring arrangement — for its ongoing operation.	which non-compliance with conditions therein may result in criminal prosecution or revoke of the ECC. As discussed ,the proposal includes the possible development of a flow gauging station on the Namibian bank at the Vioolsdrift weir which will support improved flow monitoring and will support the effective implementation of the WAP. The comment suggests that the conditions within the EMP are not binding which is incorrect. A refined commitment will be made in the EMP that requires: A stand-alone Water Abstraction Protocol (WAP) will be developed, with its own purpose, scope, roles/responsibilities, decision rules, monitoring and reporting requirements, version control, and change management procedure The WAP will be submitted to MAWLR for concurrence and to MEFT for noting and formal referencing in the ECC conditions (or as an approved management instrument). Haib Minerals and NamWater will be required to conduct ongoing stakeholder engagement during construction and operations. Through this ongoing engagement process, stakeholders will be given an opportunity to provide input on the refined WAP and confirm that the principles in the Framework remain unchanged.
3. The Data Underlying the Minimum Flow Calculation Appears Unreconciled	Mr Manie Mare of WRP — whose firm carries out the WRYM/WRPM modelling and Annual Operating Analysis underlying the Blouputs minimum flow — presented to the Namibian Grape Growers Association on 24 June 20026. In this presentation he provided the below information:	The results of the Water Resources and Water Demand (WRWD) study and proposed approach to utilise the Blouputs minimum flows to determine surplus flow which informed the EIA and subsequent EMP was authored by Mr Manie Mare. The WRWD study shows that regardless of volumes allocated by South Africa to Namibia, the system is under pressure. The abstraction of 30 million m³/a (in your comment) that are yet to be developed on the lower Orange River (excluding any Haib Mine demand) will have an impact on the

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	Licenses issued to Namibia for Lower Orange irrigation: approximately 129–130 million m³/a Actual measured Namibian irrigation use in 2024: 102.5 million m³/a Volume South Africa states it is currently releasing for Namibian irrigation: 75 million m³ We are concerned that the definition of the Blouputs minimum flow may be compromised given there is uncertainty on the accuracy of the underlying data used for determining the minimum flow. We don't know how best to address these concerns and note that you have also acknowledged that the usage information is not always clear. The current proposal is that the defined Blouputs Minimum Flow will need to be relied upon to protect downstream users. The question we have is what happens if this minimum flow calculation is determined to be inaccurate.	assurance of supply to water users and this is modelled to get worse due to expected developments along the river. This risk of impact is very clear and it is agreed that regulators should take note of the additional pressure on water users through unrealised license allocations. The abstraction rules outlined in the EMP specifically respond to this risk and ensures abstraction completely avoids low flow periods (non-surplus periods where the assurance of supply will be impacted). The abstraction rules outlined in the EMP will similarly not require releases from upstream dams and do not influence minimum flows set at Blouputs. This avoidance is only possible due to the proposed off channel storage dam planned for the proposed Haib Mine which will supplement the demand during these periods of low flow. As per the concern over the inaccuracy of the minimum flow calculations at Blouputs: The determination of these minimum flows, as stated in previous correspondence, is done on an annual basis during the Annual Operating Analysis (AOA) for the system (currently conducted by Manie Mare) and directly on quantifying the volume of water use downstream of Blouputs for the sole purpose of ensuring downstream users receive the volume they require. This process is done together with South African and Namibian regulators and invites water users to comment and provide inputs into the process and outputs. If these minimum flows were inaccurate, the data and complaints from downstream users would indicate this of which is not evident. Additionally, the annual frequency of re-evaluation of these minimum flows is intentional to ensure an adaptive and dynamic mitigation measure operates based on observed flows and feedback received from water users. In the scenario that minimum flows are insufficient in year 1, these will be updated in year 2. The minimum flows safeguard downstream users and have effectively done so since 2020. Since 2020 during these updates to the minimum flows at Blouputs, the consultant conducting the update requested data from MAFWLR as well as the Namibian farmers to provide information on water use that year (as

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		suggested, typically less than the permitted area due to irrigation areas still to be developed). Feedback from the consultant is that the process does not always get the feedback requested from farmers and thus there are indeed gaps in the dataset. It is crucial, for all water users and regulators in the Lower Orange River (MAFWLR, DWS SA and SA and Namibian Farmers), to work together to obtain the most recent and correct information on the downstream demands and then agree on the volumes to be used for that particular year. The requirement for the establishment and participation of a “Water users forum” to discuss these issues and get involved as a unified manner in the AOA has been included in the EMP. In other words the accuracy of minimum flows set annually at Blouputs can be improved with improved participation from all water users. The above detail is all obtained through discussions with Manie Mare through development of the WRWD and the formulation of the Water Abstraction Strategy. The accuracy of the minimum flows determined at Blouputs is unfortunately outside the scope of this EIA, but the development of a flow gauging station on the Namibian bank at the Vioolsdrift weir will support improved flow monitoring which can only support the annual determination of low flows at Blouputs. Similarly the discussions between MAFWLR and DWS SA on international water allocations are beyond the scope of this EIA.
Conclusion	We recognise the work your team has put into these revisions over a very short period, and the additional transparency they provide is genuinely helpful. But on the two matters we identified as central in our 4 August letter — the Protocol becoming a real, independently governed instrument with a stakeholder role, and the minimum flow commitment becoming a binding ECC condition — the position is largely	This round 2 (or Rev B) commenting opportunity and meeting on the 12 th August 2026 is over and above the regulated requirements and have been provided specifically to address water abstraction concerns. We recognise your concerns and we are pleased that this round of meetings and comments have provided additional transparency. We intend to continue engagements beyond the EIA process.

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	unchanged, and the reliability of the underlying minimum flow data is now, in our view, more clearly in question than before. Our support for these applications remains conditional on these points being resolved. Given the compressed timeline of the current review period, we would welcome the opportunity to discuss these points with you directly. We remain committed to engaging constructively in this process.	
Sonop Farming (Pty) Ltd on 24 August 2026		
International Water Allocations and Latest Agreements	What is the exact, formal water allocation from South Africa to Namibia according to the latest bilateral agreement? According to our knowledge, the latest agreement was signed in the 1980s. Confirmation on whether any newer binding agreements exist between the two countries that redefine Namibia's official rights regarding the consumption and protection of this shared water source.	The resolution on the matter of formal allocations from South Africa unfortunately remains unclear regardless of numerous attempts to obtain this information from the regulator (MAFWLR). The WRWD study (Appendix F of the EIA) shows that regardless of volumes allocated by South Africa to Namibia, the entire system is under pressure and confirms your concern that the system is overutilised. This overutilisation is modelled to get worse due to developments along the Orange River. Of course this overutilisation impacts the assurance of supply to users in periods of low flows specifically where demand exceeds available volume.
Current Permit Allocations vs. Namibia's Quota	How does the total volume of water permits already approved by The Ministry of Agricultural, Water and Forestry (MAWF) compared to the actual volume of water that Namibia is legally entitled to, to the latest official agreements? We need certainty that the river is not already over-allocated with the status quo together with future developments. Figures shared during this meeting from Manie, is already a concern and looks that we have a shortage.	The abstraction strategy outlined in the EMP ensures abstraction completely avoids abstraction during these low flow periods. The abstraction rules outlined in the EMP will similarly not require releases from upstream dams and do not influence the volume of the minimum flows set at Blouputs (which trigger releases by South Africa). This avoidance is only possible due to the proposed off channel storage dam planned for the proposed Haib Mine which will supplement the demand during these periods of low flow and therefore not pose a risk to downstream users.

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		As a result, the proposed abstraction strategy to supply the proposed Haib Mine does not place additional pressure on the volume allocation (whatever this may be) provided by South Africa.
Management Protocol and Management Control	Minimum flow levels are constantly calculated and adjusted, yet the management of these levels remains entirely outside our control and is regulated by South Africa. Records from the past ten years show that poor management, combined with extreme natural factors, has already caused severe economic damage due to either floods or total stand still of the river. How can you assure us that this already fragile situation will not worsen and further threaten our businesses? When the region enters another severe drought and river levels drop to critical minimums or come to a standstill, whose decision does it become whether the mine may continue extracting water? The management protocol should be structured in such way that downstream users have the insurance of the sustainability of the water source We demand the names, titles, and official entities of the specific individuals who will carry the legal responsibility and provide the assurance that agricultural and human needs will take priority over industrial use.	The abstraction strategy, outlined in the EMP, which, if approved, will represent a condition of the ECC, states that no abstraction may take place outside periods of surplus flow. Surplus flows are then defined based on a measure that is annually updated by joint efforts between South Africa and Namibia for the specific purpose of quantifying the volume of water use downstream of Blouputs for the sole purpose of ensuring downstream users receive the volume they require. The proposal furthermore includes the possible development of a flow gauging station on the Namibian bank at the Vioolsdrift weir which will support improved flow monitoring and will support the effective implementation of the abstraction strategy. If water is abstracted during non-surplus periods this represents a non-compliance with the legally binding EMP and by extension the conditions of the ECC which may result in criminal prosecution or revoking of the ECC. The legally responsible party for ensuring implementation of the conditions of ECC is the proponent, or holder of the ECC, NamWater. The entity responsible for enforcing it is MAFWLR.
System Management include the Agricultural Sector	Our primary remaining concern is the overall decision-making mechanism (Water Abstraction protocol) of the system. As the status quo it solely lies within Namwater, we	A refined commitment will be made in the EMP that requires: A stand-alone Water Abstraction Protocol (WAP) will be developed, with its own purpose, scope, roles/responsibilities, decision rules, monitoring and reporting requirements, version control, and change management procedure

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	need participation in the process to support and create guidance.	The WAP will be submitted to MAWLR for concurrence and to MEFT for noting and formal referencing in the ECC conditions (or as an approved management instrument). Haib Minerals and NamWater will be required to conduct ongoing stakeholder engagement during construction and operations. Through this ongoing engagement process, stakeholders will be given an opportunity to provide input on the refined WAP and confirm that the principles in the Framework remain unchanged.
Conclusion	The agricultural sector cannot operate merely on good faith; we require legal and technical assurances that Koryx Mine's expansion will not come at the expense of thousands of existing jobs and the economic stability of the Noordoewer region. We look forward to your comprehensive, written, and transparent response to each of these points.	Thank you for your letter. .We recognise your concerns and trust that this round of meetings and comments have provided additional transparency. We intend to continue engagements beyond the EIA process. The results of the specialist studies and impact assessment show that effective mitigation of impacts on the assurance of supply is only possible through temporally specific abstraction which aligns to surplus water being available in the system. To practically achieve this measure, the facility requires off channel storage as well as a clear definition of periods of "surplus". The inclusion of these aspects in the EMP ensures the conditions are legally binding and linked to key consequence if conditions are not met.