Annex 3: *Public, Stakeholder and Community Consultation Materials for the EIA Report for the Proposed 2D Seismic Survey covering the Areas of Interest (AOI) in Petroleum Exploration License (PEL) No. 73, Kavango Sedimentary Basin,* ***Kavango West and East Regions, Northern Namibia***

1. **Annex 3-1-Copies of Public Notices in Local Newspapers**
2. **Annex 3-2-Institutional Stakeholders Written Notifications**
3. **Annex 3-3- Nkurenkuru-Rundu-Windhoek Presentation Materials**
4. **Annex 3-4 - Posters Consultation Materials**
5. **Annex 3-5 - Minutes of Stakeholders, Public, Communities Meetings & Attendance Register**
6. **Annex 3-6- Public Notices Adverts Stakeholder Register Detailed for 2D Seismic Survey**
7. **Annex 3-7- Combined Stakeholders Submissions**
8. **Annex 3-8 - Issues and Response Record_EIA Scoping_2D Seismic Activities PEL 73_Kavango East and West Region**

March 2021

'Don't leave me this way'

… sing Britons in Spain as Brexit kicks in

JIMERA DE LIBAR – Bangers and mash, pints of beer, a Europeans vs Britons tug-of-war and renditions of "Don't Leave me This Way" and "We'll Meet Again". UK expats in Spain marked Britain's departure from the European Union in true British style.

Although many are unhappy at the decision to leave, with some facing residency and other bureaucratic problems, Britons at the Bar Allioli in the southern village of Jimera de Libar decided to make the best of a bad job and throw a party.

The tongue-in-cheek celebration featured a menu of all British favourites such as fish and chips and beans on toast.

"While most of us are not altogether happy about the whole thing, we might as well celebrate in a fashion and enjoy ourselves," said Paul Darwent, a 65-year-old Briton who runs the bar in the Andalusian mountains about an hour by car from the coast.

"The reality is it is going to create a lot of problems for us all," added Darwent, who has lived in Spain for over two decades, in a reference to Britain's completion of its divorce from the European Union (EU) on 31 December.

Bowing out… A man holds the Union Jack at Anti-Brexit British bar during throws mock EU goodbye party in Jimera de Libar. Photo: Nampa/AFP

Around 370 000 Britons are registered as living in Spain – more than in any other EU country – and thousands more are believed to be settled in the country without ever having notified the authorities.

Many are retirees who live on Spain's sunny southern coast, drawn by the country's warmer climate and lower cost of living.

Britons can keep their residency rights in Spain - as long as they applied for residency before 31 December, when Britain's transition period out of the EU ended.

To qualify, they must have a permanent address, a local bank account, show sufficient funds and have healthcare cover.

Many, however, do not meet the requirements, said Myra Azzopardi, a paralegal and the founder of the Citizens Advice Bureau (CAB), a British charity that helps expats with legal issues.

"We are going to have a lot of people who are going to end up without residency and without any way of getting residency," she told AFP.

Baz Rhodes, a 58-year-old paragliding guide from Manchester who has lived in Spain for 20 years, said Brexit meant he and his wife had to take out private health insurance at a cost of 200 euros ($245 euros) a month.

"I am very, very annoyed," said Rhodes, who attended the party wrapped in a EU flag.

Because of pandemic restrictions, the party was held on the bar's outdoor patio, which was decorated with British, Spanish and EU flags.

Separate entrances for EU and non-EU nationals were set up to enter the bar to use washrooms.

The musical backdrop to the festivities included live performances of The Communards' "Don't leave me this way" and Vera Lynn's "We'll meet again".

The highlight of the party was a match of tug-of-war pitting four British men against four men from Denmark, France, the Netherlands and Spain.

Cheers and applause broke out when the EU team won, causing the British team to tumble to the ground.

"If we don't celebrate in some way, we would just be crying because it is so sad," Elaine Gilfillan, a teacher from Scotland who has lived in Spain for nearly two decades, commented.

She said she was saddened that it is now much harder for her children to move to Spain, like she did, or any other EU nation.

From Friday onwards, any Briton who wants to live in Spain must follow the same procedure as for all non-EU citizens, which is more complex and difficult, with higher income requirements.

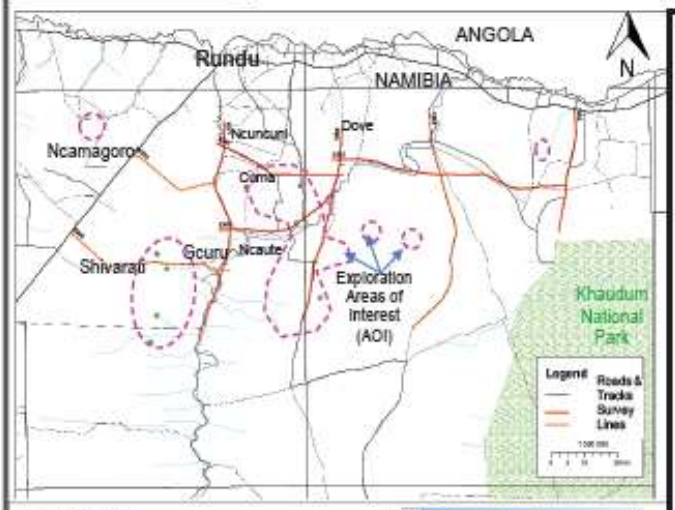
And their professional qualifications will no longer be automatically recognised in Spain. They will have to apply for it, with no guarantee of success.

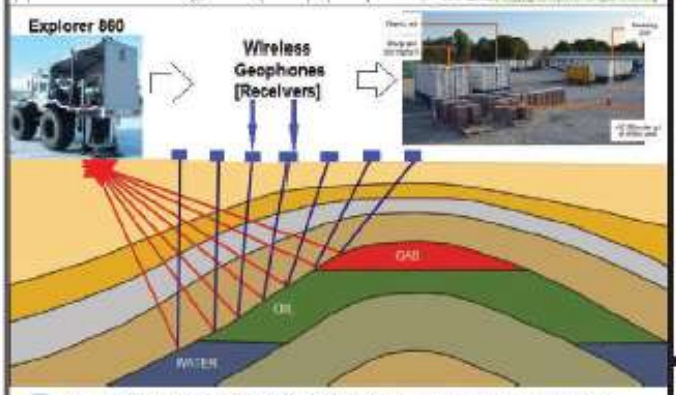
"We should be together. We are one continent. I think Britain will suffer as a result. It is not good for any of us," added Gilfillan.

- *Nampa/AFP*

ReconAFRICA

PUBLIC NOTICE FOR APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN THE PETROLEUM EXPLORATION LICENSE (PEL) No. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA





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All registered stakeholders and the public will be notified on the dates and times for meetings and open days sessions to be organised in Kavango East and West Regions. The following public meetings and open days sessions will be organised during the month of January 2021 as part of the stakeholder and public consultation process for the proposed 2D seismic survey operations in PEL 73:

(I) Public and institutional stakeholders meeting in Rundu and Nkurenkuru.
(II) Public and institutional stakeholders open day sessions in Rundu and Nkurenkuru.
(III) Field-based public / local community meetings and poster sessions at key settlements such as Ncuncuni, Cuma, Mbambi, Ncaute and Kawe, all situated long the various seismic survey lines. The field-based meetings will be undertaken in consultations with the regional councils and traditional authorities covering all the key stakeholders groups in Kavango East and West regions.

REGISTER BY EMAIL: frontdesk@rbs.com.na, or Contact Dr Sindila Mwiya for more information: smwiya@rbs.com.na, Mobile: +264-811413229

DEADLINE FOR WRITTEN SUBMISSIONS IS: FRIDAY 29th January 2021, date for the lodgement of the application for Environmental Clearance Certificate (ECC) is FRIDAY 5th February 2021

Risk-Based Solutions (RBS) CC (URL: www.rbs.com.na)
Your International Resources Technical Specialist Consultants (Oil, Gas, Minerals & Energy Exploration, Production & Mining) and Environmental Assessments (SEA, EIA, EMP, EMS)

Opinion

Harnessing Social Media Marketing

Tyenimolo Leonard

• TYENIMOLO LEONARD

SOCIAL MEDIA MARKETING is the most effective way to reach a large audience with a very small budget.

One is able to target people according to their age, hobbies, sport interests, political ideology, place of work and where they live.

There has never been such a revolutionary piece of technology in marketing since the arrival of the internet and social media networks.

It has been more than a decade since Namibia has joined other countries in the utilisation of the internet and social media, but it seems we are far from understanding how and when to use it.

Most businesses treat social media as a static platform with limited characteristics, which it is not.

Unlike a building or a car, one should think of social media as a beautiful sunflower that responds to sunlight, water and minerals in the soil: The more you water it, the more it grows, and the more beautiful it looks.

But you have to know when to water it, how much water to give it, and where to plant it.

Many businesses are doing it wrong. They design attractive artwork, which is good, but do you think people spend time on social media to look at artwork?

Social media users tend to skip and completely ignore advertisements.

The best way to position your business on social media is to make organic content available that does not look like advertising in the eyes of the consumer.

It's imperative that your advertisement looks like normal user content to get more traction and engagement.

People like to buy, but dislike being sold products.

Everyone has been to a furniture or other store where the salesman doesn't give you room to breathe.

And some hawkers try to force consumers to buy things.

Very annoying, isn't it?

Straightforward advertising and sponsored advertisements containing artwork have the same effect to a great degree: Content is king, so we have to craft content that delivers value to the consumer – either through fun activities, appealing images of models and social media influencers, or educational content, storytelling and tips.

There are two fundamental reasons why people spend time on social media.

Some women visit social media to look at other people's lives and compare themselves to other beautiful and attractive women.

Some men spend time on social media to look at beautiful women and send them direct messages in the hope of taking them on dates, or making them their girlfriends.

Men are driven by visuals.

Other factors also contribute to social media usage, such as boredom and loneliness – especially when it comes to Instagram and Facebook.

Don't bore people with your artwork that only seems to impress other graphics designers.

Tell your story.

People like to be inspired.

They trust authentic businesses and brands that share a story through videos and pictures of real people.

Stay away as far as possible from using images you downloaded from the internet if you don't want your content to be ignored.

Your content must blend in with the rest of the content available on that particular platform.

** Tyenimolo Leonard is the chief executive officer and founder of Common Sense Advertising.*

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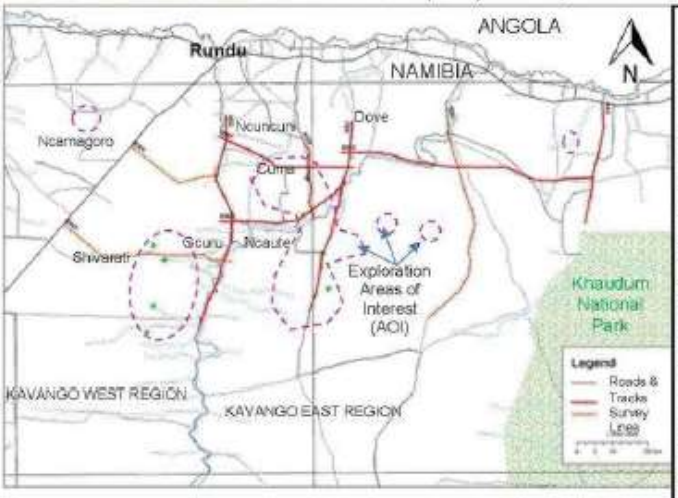

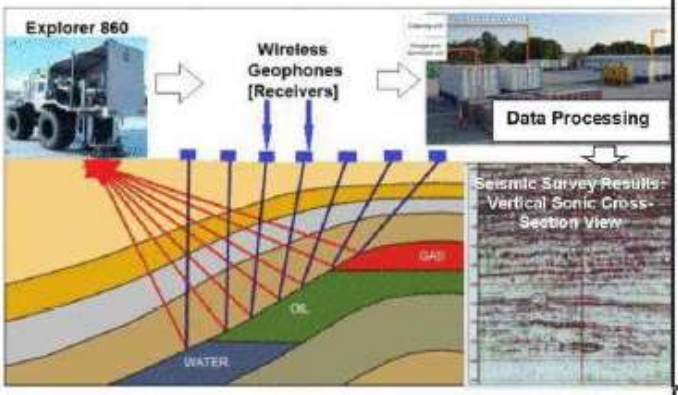

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Additionally, all the environmental reports that will be submitted to the Environmental Commissioner will be subjected to further public consultation and disclosure by the Environmental Commissioner for a period of fourteen (14) days. All registered stakeholders will be informed once the environmental reports are available at www.eia.met.gov.na

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CEGEOR cc

CENTRE FOR GEOSCIENCES RESEARCH

ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

PROPOSED MINING LICENCES, ML 222 & ML 231 ERONGO REGION

INVITATION TO COMMENT

Tidle Wave Investments 105 (Pty) Ltd is proposing to conduct full scale dimension stone Quarry mining over two (2) mining licences application areas: ML222 & ML 231 at farm NAVACHAB (MON REPOS) Karibib area Erongo Region, Republic of Namibia.

CENTRE FOR GEOSCIENCES RESEARCH cc has been appointed to undertake an Environmental Impact Assessment (EIA) in accordance with the Namibian Environmental Management Act (2007) and it Regulations (2012).

Background Information Document (BID) can be requested from **CENTRE FOR GEOSCIENCES RESEARCH cc**, after registration. All Interested and Affected Parties are invited to register with CEGEOR to receive the BID so as to raise their concerns related to the project. Furthermore, Interested and Affected Parties are requested to register with the consultant before 21st January 2021. Due to **COVID-19** pandemic outbreak we encourage online communication, unless otherwise.

All comments and concerns should be submitted to **CENTRE FOR GEOSCIENCES RESEARCH cc** For further information regarding the project, and/or registration as an Interested and Affected Party, please contact:

Mr Mulife Sikalumbu Siyambango (EAP)
CENTRE FOR GEOSCIENCES RESEARCH cc
P.O. Box 31423 Pioneerspark
Windhoek. Namibia. 128A Bach Street
Cel:0856419511
Fax: 061-307156
Email: cegeornam@gmail.com

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muremi@confidentenamibia.com

ReconAFRICA

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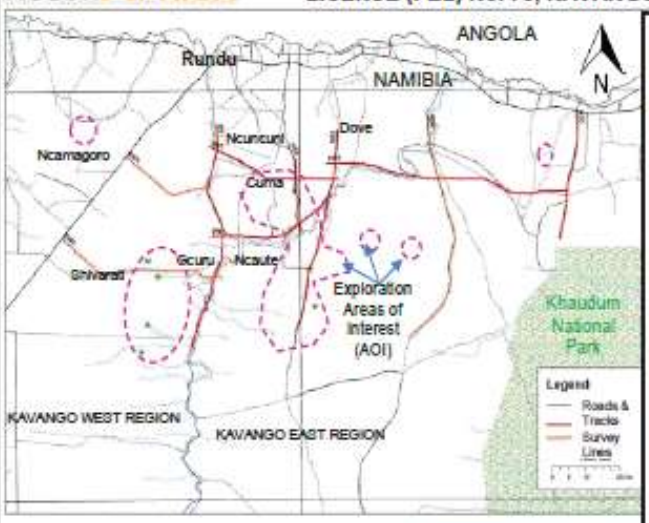

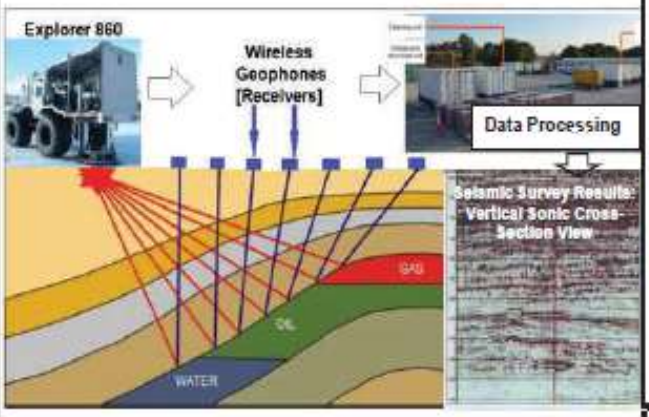

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REPUBLIC OF NAMIBIA

AFRICAN DEVELOPMENT BANK

MINISTRY OF AGRICULTURE, WATER AND LAND REFORM

NAMIBIA WATER CORPORATION (NAMWATER)

PROJECT IMPLEMENTATION UNIT

REQUEST FOR EXPRESSIONS OF INTEREST (REOI)
(CONSULTING SERVICES - FIRMS)

FOR

THE OSHAKATI PURIFICATION PLANT EXTENSION

Water Sector Support Program
Financing Agreement reference: 2000200004682
Project ID No.: P-NA-E00-005

1. Project Background:
The Government of the Republic of Namibia through the Ministry of Finance has received financing from the African Development Bank towards the cost of the Namibia Water Sector Support Program, and intends to apply part of the agreed amount of this loan for payments under the contract for provision of engineering consultancy services for the Oshakati Purification Plant Extension.

The Oshakati Water Works (OWW) is the heart of NamWater's water supply in northern Namibia. However, due to the inadequate capacity, there is now a need for an additional plant. The additional plant will ensure that the future water demand in the central northern part of Namibia, especially to the urban centres and rural areas of the Oshana, Ohangwena and Oshikoto Regions is met.

The Consultancy Services include the design (inception, preliminary and final design) of an additional treatment plant with a capacity of 50 000 m3/day (for 20 hours operation), Environmental and Social related services (ES), contractor procurement, contract administration, and project management and construction supervision for a period of 24 months.

This invitation aims to prequalify suitable consultants to submit proposals for the extension of Oshakati Waterworks.

2. The Expression of Interest
The Namibia Water Corporation (NamWater) now invites eligible consultants to indicate their interest in providing these services. Interested consultants must provide information indicating that they are qualified to perform the services (brochures, description of similar assignments, experience in similar conditions, availability of appropriate skills among staff, etc.). Consultants may constitute joint-ventures to enhance their chances of qualification.

Eligibility criteria, establishment of the short-list and the selection procedure shall be in accordance with the African Development Bank's Procurement Policy for Bank Group Funded Operations, 2015 that is available on the Bank's website at http://www.afdb.org.

Interested consultants may obtain further information at the address below during office hours: 08h30 to 16h30

Julinda !Garus-Ôas
E-mail: Garus-Oas.J@namwater.com.na

Pojo Katjivena
KatjivenaP@namwater.com.na

Expressions of interest must be submitted electronically to the address below by Friday the 22nd of January 2021 at 11h00 (local time) and clearly marked ***"Expression of Interest for Consulting Services of the Oshakati Purification Plant Extension"***.

Attn: Procurement Division
E-mail: Bids_Afdb@namwater.com.na

COSDEF

REGISTRATION at COSDECs and COSDEF ARTS & CRAFTS CENTRE

11 January 2021 - 05 February 2021
Late Registration: 10 - 22 February 2021

Registration in TVET and Short Courses are now open at all COSDEC Centres nationwide and the COSDEF Arts & Crafts Centre based in Swakopmund

COSDEF ENROLMENT

To register all prospective trainees should bring along the following documents which will assist with the mandatory NSFAF Online Application upon registration:

- Certified copy of Full Birth Certificate;
- Certified copy of Namibian Identity Document (ID);
- Certified copy of highest school leaving certificate;
- Proof of payment of application fee (cash receipt or bank deposit slip).

Requirements for NSFAF Online Applications:

- Proof of **combined Parental income** or declarations for applicants who are **28 years of age or younger and unemployed.**
- Certified copy of parents Identity Documents (ID) or death certificates if deceased.
- **Own or spousal income** or **both for employed applicants who are above the age of 28** and declarations if **unemployed.**
- **A registration fee of N$1000.00 (Refundable from trainee's NSFAF loan).**

NOTE: Payment arrangements can be made with the respective Centre to cover the registration fee.

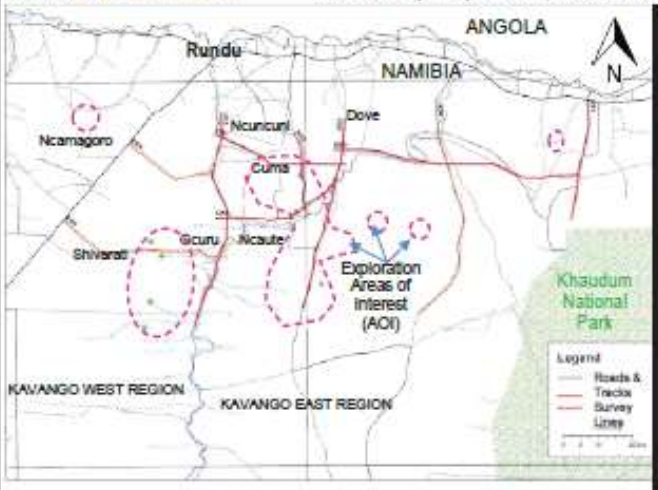
Stringent COVID-19 protocols are in place at all Centres to safe guard the health of all staff, trainees and visitors.
Persons not adhering to the COVID-19 protocols will not be assisted.

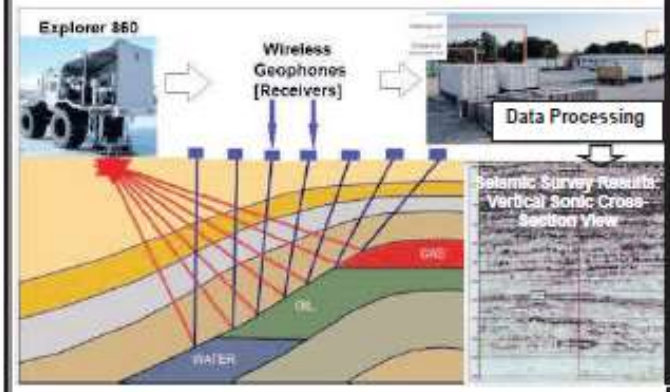
For more information: 064 400 358 | info@cosdef.org.na | www.cosdef.org.na

LEARN TO EARN

ReconAFRICA

PUBLIC NOTICE FOR APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN THE PETROLEUM EXPLORATION LICENSE (PEL) No. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA





Reconnaissance Energy Namibia (Pty) Ltd (the Proponent and Operator) holds petroleum exploration rights under the Petroleum Exploration License (PEL) No. 73 granted by the Ministry of Mines and Energy (MME). Reconnaissance Energy Namibia (Pty) Ltd is a subsidiary of Reconnaissance Energy Africa Ltd (ReconAfrica), an international Canadian public listed oil and gas company. The company intends to conduct 450 km long of 2D seismic survey operations as part of the exploration commitments to the Government of the Republic of Namibia. The proposed survey operations covering the key exploration Areas of Interest (AOI) within PEL 73 will be conducted along existing roads and tracks, using an environmentally friendly, limited footprint and efficient light trucks, the Explorer 860 Accelerated Weight Drop (AWD) energy sources and wireless receivers. The AOI interests as shown on the map do not fall in an environmental proclaimed protected or sensitive area nor in groundwater protection zone. The key central exploration interests are situated about 55 km south of Rundu, 80 km south of the Okavango River, more than 260 km from the Okavango Delta in Botswana and not related to the Delta whatsoever, more than 40 km from the boundary of the Khaudum National Park and more than 70 km from the Mangetti National Park. The overall general area falls in the sparsely populated but not pristine communal areas of the Ncamangoro and Mashare Constituencies of the Kavango West and East Regions, respectively. Ncamangoro and Mashare Constituencies falls within the boundaries of the Mbunza and Sambyu Traditional Authorities, respectively.

2D seismic survey is an environmentally friendly nonintrusive geophysical method used for mapping or imaging of the subsurface geology. During the seismic survey, the weigh drop generated seismic wave which travels into the earth gets reflected by various subsurface formations, and returns to the surface where it is recorded by the receivers called geophones. The resultant product following complex processing is a vertical sonic cross-section of the subsurface beneath the survey line showing the geological materials (de-risked geological sub model) and structures that the acoustic wave has travelled through. This information is used to predict potential areas where oil or gas may be trapped in sufficient quantities for further exploration activities such as drilling of an exploration well. The proposed petroleum exploration activities (2D seismic survey operations) cannot be undertaken without an Environmental Clearance Certificate (ECC) as required by the Environmental Protection Clause 11 of the Petroleum Agreement signed between ReconAfrica and the Government of the Republic of Namibia, Petroleum (Exploration and Production), 1991, (Act No. 2 of 1991), Petroleum Laws Amendment Act, 1998, (Act 24 of 1998), the Environmental Management Act, 2007, (Act No. 7 of 2007) and all other applicable national laws and Regulations. In fulfilment of the environmental requirements, Reconnaissance Oil and Gas (Pty) Ltd has appointed Risk-Based Solutions (RBS) CC as the Environmental Consultant and led by Dr Sindila Mwiya as the Environmental Assessment Practitioner (EAP) to undertake the Scoping, EIA and EMP to support the application for ECC and other permits. All Interested and Affected Parties (I&APs) are hereby invited to register and submit written comments / objections / inputs with respect to the proposed 2D seismic survey operations covering the key Areas of Interests (AOI) in PEL 73.

The following public meetings and open days sessions are organised as part of the stakeholder and public consultation process for the proposed 2D seismic survey operations in PEL 73 specifically targeting the regional and local communities of Kavango West and East Regions and an opportunity for a factual field visits for I&APs from outside the two regions:

(I) Kavango West Region, Nkurenkuru, Nkurenkuru Community Hall, Wednesday, 20th January 2021, Morning Session from 10hrs00 to 13hrs00 Formal Meeting and Afternoon Session from 16hrs00 to 18hrs00 Open Sessions Public walk in as needed.

(II) Kavango East Region, Rundu, AMTA, Friday 22nd January 2021, Morning Session from 10hrs00 to 13hrs00 Formal Meeting and Afternoon Session from 16hrs00 to 18hrs00 Open Sessions Public walk in.

(III) Field-based public / local villages community meetings and poster sessions at key settlements such as Ncamagoro, Gcuru, Ncuncuni, Cuma, Mbambi, Ncaute and Kawe, all situated along the various seismic survey lines. The field-based meetings / sessions will be undertaken in coordination with the regional councillors and traditional authorities from Saturday 23rd to Monday 26th January 2021.

Additionally, all the environmental reports that will be submitted to the Environmental Commissioner will be subjected to further public consultation and disclosure by the Environmental Commissioner for a period of fourteen (14) days. All registered stakeholders will be informed once the environmental reports are available at www.eia.met.gov.na.

Risk-Based Solutions (RBS) CC (URL: www.rbs.com.na)
Your International Resources Technical Specialist Consultants (Oil, Gas, Minerals & Energy Exploration, Production & Mining) and Environmental Assessments (SEA, EIA, EMP, EMS)

REGISTER BY EMAIL AND RESERVE A PLACE FOR THE MEETINGS: frontdesk@rbs.com.na or Contact Dr Sindila Mwiya for more information: smwiya@rbs.com.na, Mobile: +264-811413229

DEADLINE FOR WRITTEN SUBMISSIONS IS: FRIDAY 29th January 2021, **date for the lodgement of the application for Environmental Clearance Certificate (ECC) is** FRIDAY 5th February 2021

Responding to consumers financial needs

Bank Windhoek ranked as the best bank in Namibia

Bank Windhoek's Managing Director, Baronice Hans. PHOTO CONTRIBUTED

Profitability, cost efficiency, credit risk, advance growth, market share, and capital adequacy propels bank.

PHILLEPUS UUSIKU

PSG Namibia's 2020 Banking Review has again ranked Bank Windhoek as the best bank in the country for the second consecutive year.

The ranking system consisted of six categories: profitability, cost efficiency, credit risk, advance growth, market share, and capital adequacy. In the Namibian bank's category, Bank Windhoek outperformed in five categories, leading to best rate amongst the major financial institutions in Namibia.

The review stated that financial ratios were based on the most recent financial statement data and all compounded growth numbers over three years. Participating bank's overall performance and soundness by identifying their strengths and weaknesses regarding other metrics such as liquidity and credit risk policies were also measured.

PSG Namibia is a reputable financial services group. Established in 1998, PSG offers a value-orientated approach, from asset and wealth management to insurance.

A relationship-driven bank

Bank Windhoek's Managing Director, Baronice Hans, said that despite the challenging economic environment exacerbated by the Covid-19 pandemic, she is grateful for the trust and confidence shown by customers and staff.

"As a relationship-driven bank, our success is the result of their dedication and resilience," she said.

Hans added that Bank Windhoek has a unique and proud heritage based on its founders' entrepreneurial foresight and pioneering spirit embedded in its culture.

"In as much as we are building a strong and high-performance driven business, we focus on being a responsible corporate citizen by giving back to the communities in which we operate. We also ensure that we embed environmental sustainability as evident from our issuance of the first Southern Africa Green Bond in 2018," she added.

National Union Democratic Organisation (Nudo) MP, Joseph Kauandenge. PHOTO NAMPA

Nudo supports striking Shoprite employees

The National Unity Democratic Organisation (Nudo) has thrown its weight behind employees of the Shoprite group who have been striking since December for better wages.

Employees of Shoprite, Checkers, and Usave are demanding a salary increment of N$ 600, housing allowance of N$450, transport allowance of N$ 500, and permanent employment for workers who have worked in these stores for over a year.

Nudo Secretary General and Member of Parliament (MP) Joseph Kauandenge claimed that it has become the norm for foreign companies to disregard Namibian labour laws and pay their workers peanuts while they take the bulk of their money back to their respective countries.

Kauandenge also noted that Nudo is perplexed by the silence of the Namibian Government on the Shoprite issue.

He further called on Namibians to reject the exploitation of Namibian workers by foreign establishments.

"We are also calling on all Namibians to show solidarity with the striking workers and not to buy from Shoprite," he said.

- Nampa

ReconAFRICA

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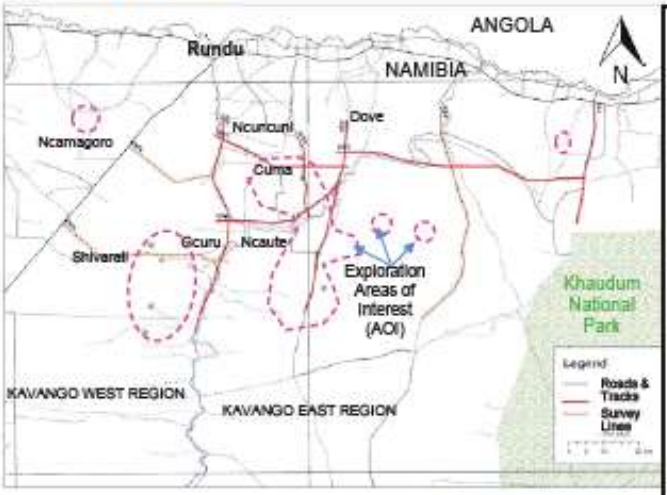

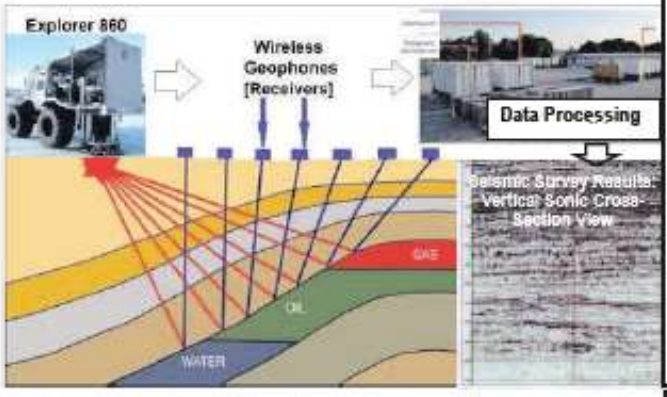

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Your International Resources Technical Specialist Consultants (Oil, Gas, Minerals & Energy Exploration, Production & Mining) and Environmental Assessments (SEA, EIA, EMP, EMS)

REGISTER BY EMAIL AND RESERVE A PLACE FOR THE MEETINGS: frontdesk@rbs.com.na or Contact Dr Sindila Mwiya for more information: smwiya@rbs.com.na, Mobile: +264-811413229

DEADLINE FOR WRITTEN SUBMISSIONS IS: FRIDAY 29th January 2021, date for the lodgement of the application for Environmental Clearance Certificate (ECC) is FRIDAY 5th February 2021

Finally... The Tsintsabis settlement where residents will now get legal documents for ownership of land.
Photo: Obrein Simasiku

'Minor' objections over Tsintsabis land allocation

■ **Obrein Simasiku**

OMUTHIYA – The Land Reform Advisory Commission will this month adjudicate on the issuance of 151 allotment letters to residents of Tsintsabis and farm Oerewoud in the Oshikoto region.

The residents have been occupying the piece of land for the past 28 years and had no right to the portions of land they currently occupy.

The land reform ministry last year took a drastic decision to issue allotment letters to residents in an effort to end infights due to the prevalent sales of both residential and farming land to outsiders.

"We are making progress and we placed an advert for objection last year. We, however, received five, although they are minor ones that relate to boundaries. We have thus far-forwarded to the land reform advisory committee, which is likely to sit end of the month and deliberate on the issue, and also make recommendations to the minister for final endorsement," explained director of resettlement and regional programme in the land reform ministry Alfred Sikopo in an interview with *New Era* last week.

In addition, he said, recommendations for allotments have been made for those without any objections, while the ministry will have to conduct an investigation for objected portions to establish the facts.

About 51 residents of Tsintsabis who settled at the farm upon its acquisition by government in 1992 will receive allotment letters, while 100 would be issued in Oerewoud.

In October last year, Sikopo said this is the first phase.

The second phase will include those who were illegally allocated or settled on the land.

"The allotment will be handled in two phases, with the second to be expedited after a thorough consultative process with the regional council, traditional authority and community. All problems of Tsintsabis will be resolved by the ministry. We do have a list of the earliest people resettled as well as a map. Therefore, that is why we are here today so you can help us in identifying and verifying legitimate people resettled. If there are incidents of people claiming to own same plots, let us hear it so that we solve it before we put names in the newspaper for objections," he said at the time.

Swakop man acquitted of rape charges

■ **Roland Routh**

One of two men accused of rape in Swakopmund during 2015 and 2017 dodged a bullet last week when all charges against him were dismissed in the Windhoek High Court by Judge Claudia Claasen.

Claasen said the state failed to adduce any evidence against Desmond !Owos-Oab, and he, thus, stands to be discharged on all counts he was facing.

With regards to his co-accused, Chris van Wyk, the judge said that except for a charge of rape, he too is acquitted on the other charges he faces.

Van Wyk faced three counts of rape, one count of assault with intent to cause grievous bodily harm and one count of theft, while !Owos-Oab is facing two counts of rape, one count of assault with intent to cause grievous bodily harm, one count of theft and one count of housebreaking with intent to rape and rape.

According to the charge sheet, both accused on 1 November 2015, at an area near Masilo Street in Mondesa, Swakopmund, whilst the complainant was on her way to a friend's house, approached her and then assaulted and raped her.

It is further alleged that they took turns with the one helping the other to commit the vile deed.

With regard to the housebreaking charge, it is alleged that !Owos-Oab, during the evening hours of 5 March 2017 broke into the room where the complainant was lying, passed out after a drinking spree, and raped her. This charge was, however, withdrawn by the State.

Both tendered not guilty pleas at the start of their trial.

In relation to !Owos-Oab, Claasen said the State correctly conceded that no evidence upon which a reasonable court acting carefully could convict him and he is entitled to the discharge.

However, she said, the position in respect of Van Wyk is slightly different. "As for the statutory rape charge, the court heard evidence from the State and the court became privy to the version postulated by the defense.

In short, the version is that accused 1 (Van Wyk) and the complainant agreed to have sex in a toilet, which could not materialise, and they went home.

As they walked, they fell prey to four men, who attacked them.

She went on to say that both the versions of the State and Van Wyk place him on the scene.

According to the judge, the evidence of three eyewitnesses that they observed Van Wyk on top of the complainant and that he was making movements consistent with having intercourse was not displaced by the defence despite rigorous cross-examination.

"Nor was the evidence of such poor quality that it does not constitute a prima facie case on the rape count," she said.

For that reason, she said, he stands to be put on his defence.

With regards to the other charges, the judge said no prima facie evidence was put before the court to allow it to ask answers from Van Wyk. Siyomunji indicated to the court that his client will not take the stand to testify.

The matter was remanded to 19 March for submissions of the verdict.

The state was represented by Dominic Lisulo.

- rrouth@nepc.com.na

Free as a bird.... Desmond !Owos-Oab (right).

PUBLIC NOTICE
APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) BY BLUESTATE INVESTMENTS (Pty) Ltd FOR PROPOSED MINERALS EXPLORATIONS / PROSPECTING IN THE EXCLUSIVE PROSPECTING LICENSE (EPL) No. 7272, DISTRICT, OMAHEKE REGION

Bluestate Investments (Pty) Ltd (the "Proponent") holds mineral rights under the Exclusive Prospecting License (EPL) No. 7272 for base and rare metals, dimension stones, industrial minerals, precious metals, precious stones, and semi-precious stones. The EPL 7272 was granted on the 23/05/2019 and will expire on the 22/05/2022. The EPL 7272 has a total area of 14774 Ha and covers the communal land around Otjimarangombe, east of Epukiro.

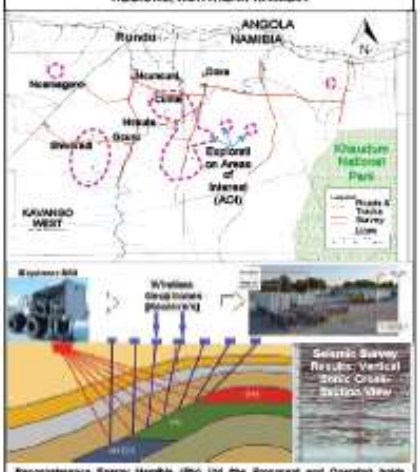
The Proponent intends to conduct exploration / prospecting activities starting with desktop studies including the processing and interpretation of the existing geophysical data sets, followed by regional field-based reconnaissance activities and if the results are positive, implement detailed site-specific field-based activities using techniques such as geological mapping, geophysical surveys, trenching, drilling, and sampling for laboratory tests. The proposed prospecting activities are listed in the Environmental Management Act, 2007, (Act No. 7 of 2007) and the EIA Regulations 30 of 2012 and cannot be undertaken without an Environmental Clearance Certificate (ECC).

In fulfilment of these environmental requirements, the Proponent has appointed Risk-Based Solutions (RBS) CC as the Environmental Consultant, led by Dr Sindila Mwiya as the Environmental Assessment Practitioner (EAP) to prepare the Environmental Reports to support the application for ECC. All Interested and Affected Parties (I&AP) are hereby invited to register and submit written comments / objections / inputs with respect to the proposed prospecting activities. A Background Information Document (BID) is available on request upon registration.

REGISTER BY EMAIL: [illegible] and more information contact
Dr Sindila Mwiya (EAP/ International Resources Technical Specialist Consultant, Email: [illegible], Mobile: 0811413229
CONSULTATION DURATION AND DEADLINE FOR WRITTEN SUBMISSIONS IS: FROM FRIDAY 5th FEBRUARY 2021 to FRIDAY 26th FEBRUARY 2021

Risk-Based Solutions (RBS) CC (URL: www.rbs.com.na)
International Specialist Consultants (Oil, Gas, Minerals & Energy Exploration, Production & Mining) and Environmental Assessments (SEA, EIA, EMP, EMS)

PUBLIC NOTICE ON THE EXTENDED DEADLINE FOR SUBMISSION OF WRITTEN INPUTS TO THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN THE PETROLEUM EXPLORATION LICENSE (PEL) No. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA



Reconnaissance Energy Namibia (Pty) Ltd (the Proponent and Operator) holds petroleum exploration rights under the Petroleum Exploration License (PEL) No. 73 granted by the Ministry of Mines and Energy (MME). Reconnaissance Energy Namibia (Pty) Ltd is a subsidiary of Reconnaissance Energy Africa Ltd (ReconAfrica), an International Canadian public listed oil and gas company. The company intends to conduct 489 km long of 2D seismic survey operations as part of the exploration commitments to the Government of the Republic of Namibia. The proposed survey operations covering the key exploration Areas of Interest (AOI) within PEL 73 will be conducted along existing roads and tracks, using an environmentally friendly, limited footprint and efficient light trucks, the Explorer 880 Accelerated Weight Drop (AWD) energy sources and wireless receivers. The key central exploration interests are situated about 55 km south of Rundu, 80 km south of the Okavango River, more than 250 km from the Okavango Delta in Botswana and not related to the Okavango Delta whatsoever, more than 40 km from the boundary of the Khaudum National Park and more than 70 km from the Mangetti National Park.

REGISTER BY EMAIL: [illegible] and for more information contact:
Dr Sindila Mwiya (EAP/ International Resources Technical Specialist Consultant, Email: [illegible], Mobile: 0811413229

DEADLINE FOR WRITTEN SUBMISSIONS EXTENDED TO: FRIDAY 12th FEBRUARY 2021

Risk-Based Solutions (RBS) CC (URL: www.rbs.com.na)
International Specialist Consultants (Oil, Gas, Minerals & Energy Exploration, Production & Mining) and Environmental Assessments (SEA, EIA, EMP, EMS)

Annex 3-2-Institutional Stakeholders Written Notifications

March 2021

Risk – Based Solutions (RBS) CC

41 Feld Street Ausspannplatz
Cnr of Lazarett and Feld Street
P. O. Box 1839, **WINDHOEK, NAMIBIA**

Tel: +264-61-306058, **FaxMail**: +264-886561821
Mobile: +264-811413229, **Email**: frontdesk@rbs.com.na
Global Office / URL: www.rbs.com.na

Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

Office of the Governor for Kavango West Region
P. O. Box 6274
NKURENKUERU
KAVANGO WEST REGION

13th January 2021

Dear Hon. Governor,

RE: Proposed 2D Seismic Survey Operations in the Petroleum Exploration License (PEL) No. 73 Public and Stakeholder Consultation Meeting, 20th January 2020, Nkurenkuru Community Hall, Copy of the Draft Environmental Scoping Report and Draft Programme

Please find attached to this covering letter the hardcopy of the Environmental Scoping Report providing more detailed information about the proposed 2D seismic survey operations in the Petroleum Exploration License (PEL) No. 73 by Reconnaissance Energy Namibia (Pty) Ltd (ReconAfrica) (the Proponent and Operator). The reports shall be distributed to your key institutional stakeholders and traditional authorities and two (2) left to your offices for public viewing as may be directed in our advertisements.

The company intends to conduct 450 km long of 2D seismic survey operations as part of the exploration commitments to the Government of the Republic of Namibia. The proposed survey operations covering the key exploration Areas of Interest (AOI) within PEL 73 will be conducted along existing roads and tracks, using an environmentally friendly, limited footprint and efficient light trucks, the Explorer 860 Accelerated Weight Drop (AWD) energy sources and wireless receivers.

The AOI interests as shown on the map do not fall in an environmental proclaimed protected or sensitive area nor in groundwater protection zone. The key central exploration interests are situated about 55 km south of Rundu, 80 km south of the Okavango River, more than 260 km from the Okavango Delta in Botswana and not related to the Delta whatsoever, more than 40 km from the boundary of the Khaudum National Park and more than 70 km from the Mangetti National Park.

The following public meetings and open days sessions are organised as part of the stakeholder and public consultation process for the proposed 2D seismic survey operations in PEL 73 specifically targeting the regional and local communities of Kavango West as follows:

(i) Nkurenkuru Community Hall, Wednesday, 20th January 2021, Morning Session from 10hrs00 to 13hrs00 Formal Meeting and Afternoon Session from 15hrs00 to 18hrs00 Open Sessions Public walk in as needed.

(ii) Field-based public / local villages community meetings and poster sessions at key settlements such as Ncamagoro and Ncaute all situated along the various seismic survey lines. The field-based meetings / sessions will be agreed at the official meeting and be undertaken in coordination with the regional councillors and traditional authorities from Saturday 23rd to Monday 25th January 2021.

A draft programme for the proposed meeting of the 20th January 2021 is attached.

Your Sincerely,

Risk-Based Solutions cc
WINDHOEK NAMIBIA
13 JAN 2021

.....

Dr. Sindila Mwiya
Technical Consultant / EAP
Risk-Based Solutions (RBS) CC

Risk – Based Solutions (RBS) CC

41 Feld Street Ausspannplatz
Cnr of Lazarett and Feld Street
P. O. Box 1839, **WINDHOEK, NAMIBIA**

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Mobile: +264-811413229, **Email**: frontdesk@rbs.com.na
Global Office / URL: www.rbs.com.na

Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

Office of the Governor for Kavango East Region
Markus Swarongo Road
Private Bag 2124
RUNDU
KAVANGO WEST REGION

13th January 2021

Dear Hon. Governor,

RE: Proposed 2D Seismic Survey Operations in the Petroleum Exploration License (PEL) No. 73 Public and Stakeholder Consultation Meeting, 22nd January 2020, AMTA ReconAfrica Offices Rundu, Copy of the Draft Environmental Scoping Report and Draft Programme

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The following public meetings and open days sessions are organised as part of the stakeholder and public consultation process for the proposed 2D seismic survey operations in PEL 73 specifically targeting the regional and local communities of Kavango East as follows:

(i) AMTA, ReconAfrica Offices, Friday, 22nd January 2021, Morning Session from 10hrs00 to 13hrs00 Formal Meeting and Afternoon Session from 15hrs00 to 18hrs00 Open Sessions Public walk in as needed.

(ii) Field-based public / local villages community meetings and poster sessions at key settlements such as Cuma, Kawe and Ncaute all situated along the various seismic survey lines. The field-based meetings / sessions will be agreed at the official meeting and be undertaken in coordination with the regional councillors and traditional authorities from Saturday 23rd to Monday 25th January 2021.

A draft programme for the proposed meeting of the 22nd January 2021 is hereto attached.

Your Sincerely,

Risk-Based Solutions cc
WINDHOEK NAMIBIA
13 JAN 2021

.....

Dr. Sindila Mwiya
Technical Consultant / EAP
Risk-Based Solutions (RBS) CC

Risk – Based Solutions (RBS) CC

41 Feld Street Ausspannplatz
Cnr of Lazarett and Feld Street
P. O. Box 1839, **WINDHOEK, NAMIBIA**

Tel: +264-61-306058, **FaxMail**: +264-886561821
Mobile: +264-811413229, **Email**: frontdesk@rbs.com.na
Global Office / URL: www.rbs.com.na

Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

Mrs. Maggy Shino
Petroleum Commissioner
Ministry of Mines and Energy
1 Aviation Road
Private Bag 13297
WINDHOEK, NAMIBIA

Dear Mrs. Shino, 15th January 2021

RE: Proposed 2D Seismic Survey Operations in the Petroleum Exploration License (PEL) No. 73 Public and Stakeholder Consultation Invitation and Copy of the Draft Environmental Scoping Report

Please find attached to this covering letter the hardcopy of the Environmental Scoping Report providing more detailed information about the proposed 2D seismic survey operations in the Petroleum Exploration License (PEL) No. 73 by Reconnaissance Energy Namibia (Pty) Ltd (ReconAfrica) (the Proponent and Operator).

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Ministry of Mines and Energy Library
1 Aviation Road
Private Bag 13297
WINDHOEK, NAMIBIA

Attention: **Chief Librarian**, 15th January 2021

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Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

National Petroleum Corporation of Namibia (Pty) Ltd
1 Aviation Road,
Petroleum House
Private Bag 13196
WINDHOEK, NAMIBIA

Attention: Managers Exploration / HSE, 15th January 2021

RE: Proposed 2D Seismic Survey Operations in the Petroleum Exploration License (PEL) No. 73 Public and Stakeholder Consultation Invitation and Copy of the Draft Environmental Scoping Report

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Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

The Executive Director
Ministry of Agriculture, Water and Land Reform
Government Office Park, Luther Street
Private Bag 13184,
WINDHOEK NAMIBIA

15th January 2021

Attention: Managers / Directors for Kavango West and East Regions,

RE: Proposed 2D Seismic Survey Operations in the Petroleum Exploration License (PEL) No. 73 Public and Stakeholder Consultation Invitation and Copy of the Draft Environmental Scoping Report

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Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

The Executive Director
Ministry of Urban and Rural Development
Government Office Park, Luther Street
Private Bag 13289
WINDHOEK NAMIBIA

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Consulting Arm of Foresight Group Namibia (FGN) (PTY) LTD

Roads Authority
Snyman Circle, Ausspannplatz, Windhoek
Telephone: +264 61 284 7000
Fax: +264 61 284 7158

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Annex 3-3- Nkurenkuru-Rundu-Windhoek Presentation Materials

March 2021

Windhoek Public And Stakeholders Meeting for the Proposed 450km Long 2D Seismic Operations in Petroleum Exploration License (PEL) No. 73

NOTE:
COVID-19 Regulatory Requirements:
Wear Your mask at all times, Social Distance, Maximum 50 People and meeting to last for not more than 2hrs

WINDHOEK PUBLIC AND STAKEHOLDERS CONSULTATION MEETING
2nd FEBRUARY 2021

Environmental Consultants

Dr Sindila Mwiya
PhD, MPhil, PG Cert, BEng (Hons), Pr. Eng
International Resources Consultant /Founder/EAP
smwiya@rbs.com.na or frontdesk@rbs.com,na

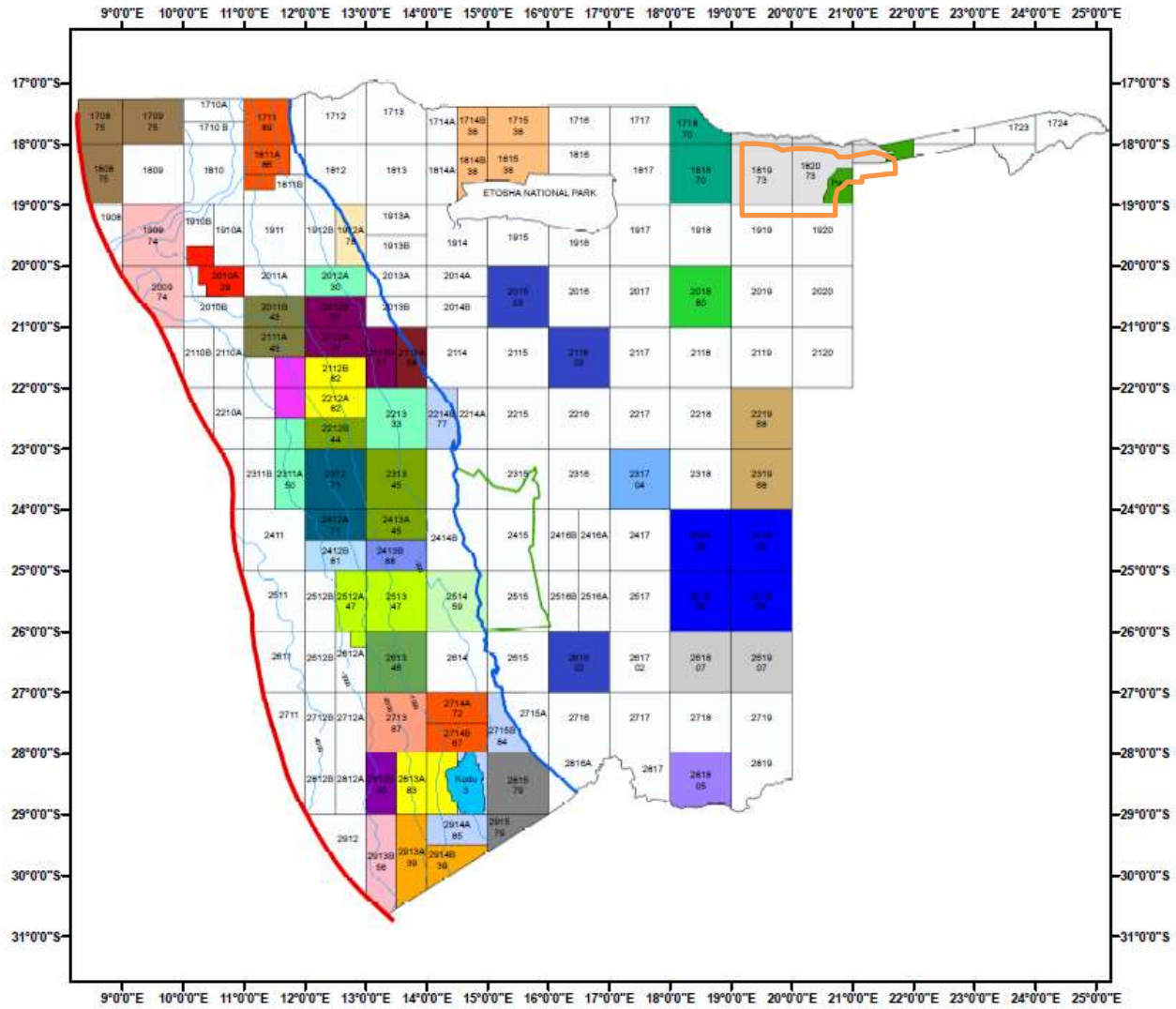
Risk – Based Solutions (RBS) CC
Delivering De-Risked Solutions

Purpose of the Meeting

1. To inform the stakeholders about the proposed **2D Seismic Survey** operations in PEL 73 by the **Proponent (ReconAfrica)** and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by **Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP)** in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations.

2. To obtain inputs from the stakeholders to be incorporated in the preparation of the Final Scoping, Draft EIA and EMP Reports that will support the application for the ECC for the proposed 2D Seismic Survey operations.

Hydrocarbons Map of Namibia



Legend

- Limit Exclusive Economic Zone
- Isobath
- Shore line
- Etosha national Park
- World Heritage Zone

Production License

- (PL 3) BW Kudu / NAMCOR

Exploration License

- (PEL 29) Jupiter Petroleum Namibia
- (PELs 30, 33, 50) Eco Oil & Gas
- (PEL 34) Azinam / ECO
- (PEL 37) Tullow / ONGC / Pancontinental
- (PEL 38) Hydrocarb Namibia Energy Corp
- (PEL 39) Shell Exploration & Production
- (PELs 43) Oranto Petroleum
- (PELs 44, 45) Maurel & Prom Namibia
- (PEL 46) Cowan Oil and Gas Namibia
- (PEL 47) Serica Energy Namibia
- (PEL 56) Total / Impact
- (PEL 58) Nabirm Energy Services
- (PEL 59) Lekoil E&P
- (PEL 67, 72, 86, 89) NAMCOR
- (PEL 68) Alumni Expl East Namibia
- (PEL 70) ACREP-Exploracao Petrolifera
- (PEL 71) Enigma Oil and Gas
- (PEL 73) Reconnaissance Energy
- (PEL 74) Tse Oil & Gas
- (PEL 75) Camelot Investment Group
- (PEL 76, 77, 84, 85) Rhino resources
- (PEL 78) Global Oil and Gas
- (PEL 79) Windfire Petroleum
- (PEL 80) Methacarb Investments
- (PEL 81) Sungu Sungu
- (PEL 82) Galp Energia / ExxonMobil
- (PEL 83) Galp Energia
- (PEL 87) Pancontinental Orange
- (PEL 88) Sezigyn Oil & Gas
- (PEL 90) Calima Energy

Reconnaissance License

- (02, 03) Tristone Africa Namibia
- (04) Atlantic Petroleum
- (05) Oshikoto Power
- (06) Namibia E Source Petroleum
- (07) CGP Energy

N W E S

0 55 110 220 nm
0 112.5 225 450 km

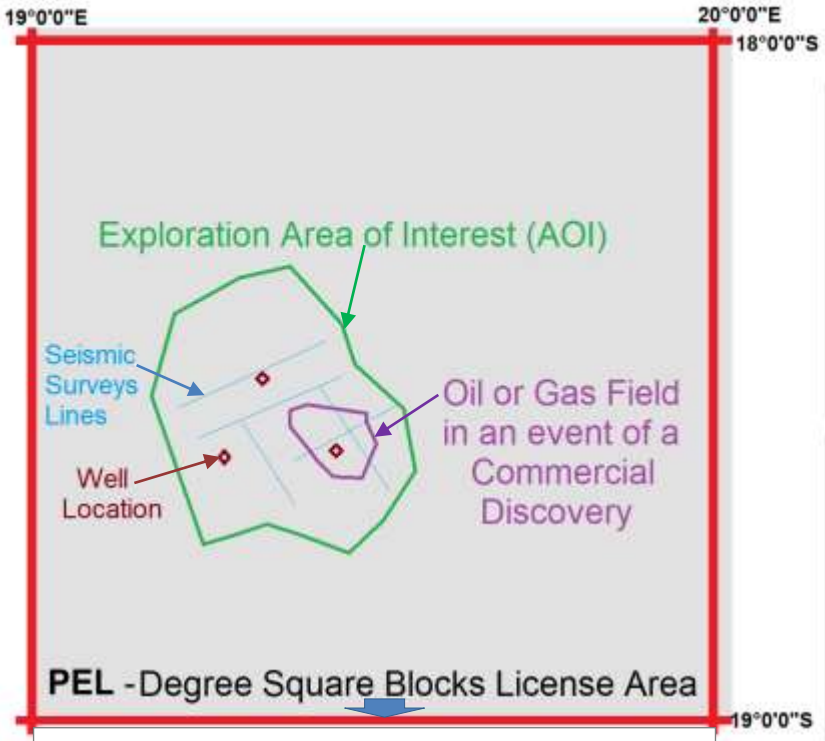
MME NAMCOR

For further information:

www.namcor.com.na
www.mme.gov.na

Updated: 09 August 2018

PEL, AOI, SEISMIC SURVEY, WELL & OIL /GAS FIELD

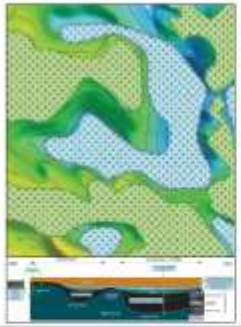


The environmental footprint of any ground-based oil and gas exploration operations is often the temporary campsite, operated less than 90 days and usually occupies an area ranging from 2 – 6 Ha (150m by 150m to 250m by 250m) depending on the type and size of the exploration operations.

Seismic survey operation is a nonintrusive exploration method used in validating the geologic sub model through imaging of the subsurface in the search for key geological structures that could hold oil or gas within a Sedimentary Basin.

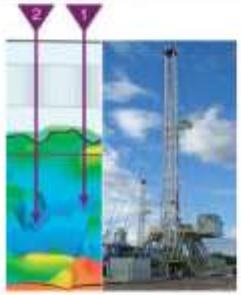
The size of an oil and gas exploration well (actual hole drilled) differs from well to well, but is generally around 12.5 to 90 centimetres wide and this is the footprint made into the ground with targets as deep as 3 - 4 km.

De Risking /Exploration Process from Degree Square Blocks to Oil or Gas Field



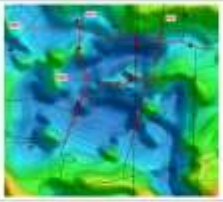
Collect existing key historical data sets pertaining to petroleum geology, aerial gravity, magnetics and define the Sedimentary Basin / Petroleum System

COVERAGE: PEL AREA



If the Sedimentary Basin is unknown, a site-specific stratigraphic well/s drilling operation is undertaken in order to confirm the existence

COVERAGE: HIGHLY LOCALISED WITHIN AOI



2D seismic survey is used to search for potential geological structures that could hold economic oil or gas called reservoirs

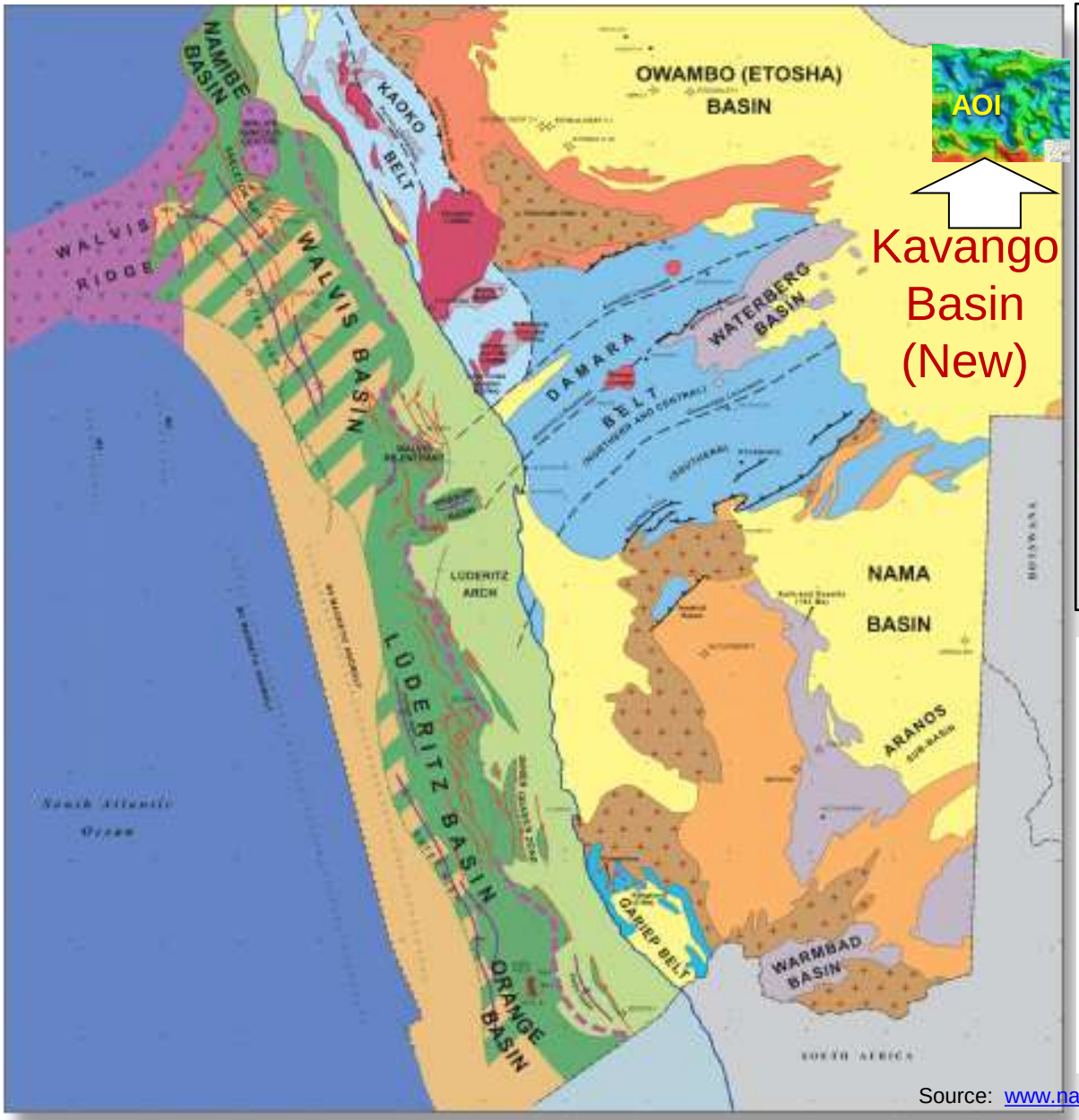
COVERAGE: WIDER AOI

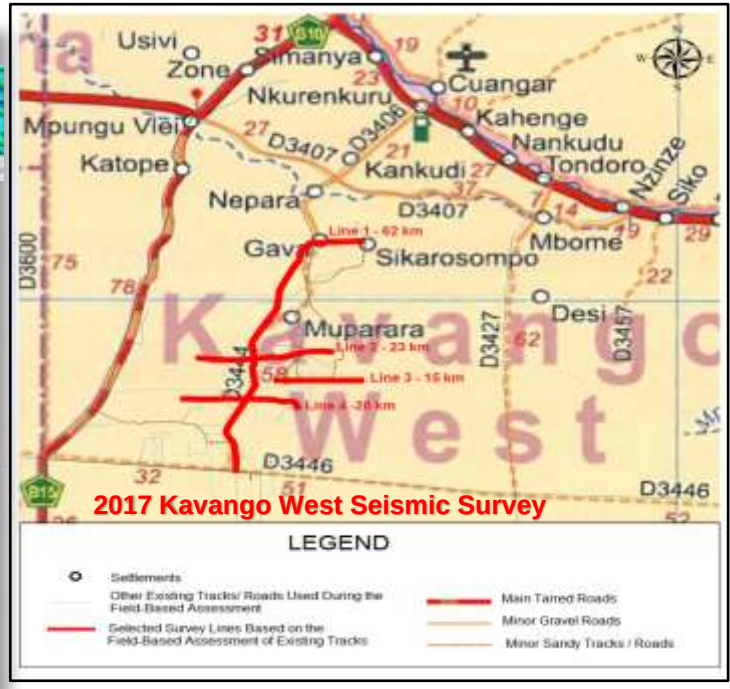
Exploration well drilling is undertaken on the identified geological structure (Potential reservoir). If there is oil or gas discovered, appraisal well drilling operations follows to test the size and economics of the discovered field

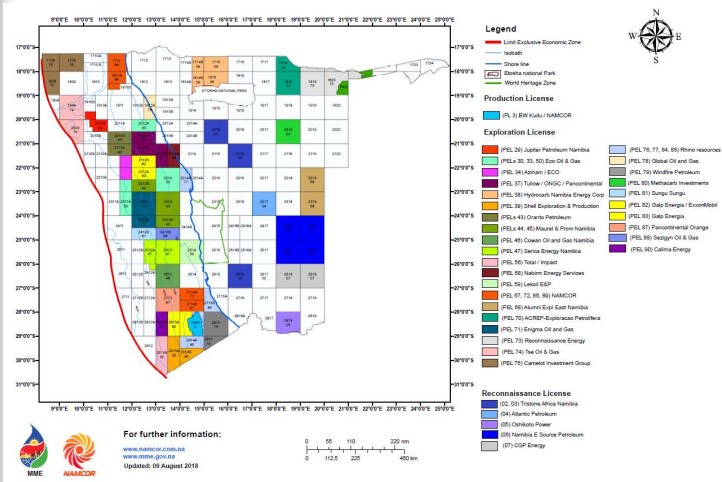
COVERAGE: LOCALISED AOI / FIELD IF A DISCOVERY

Sedimentary Basins Namibia & Historical Perspective

- A number of wells have been drilled onshore and onshore Namibia including in the Etosha National Park. Seismic survey has also been undertaken offshore and onshore Namibia and the recent one has been in Kavango West







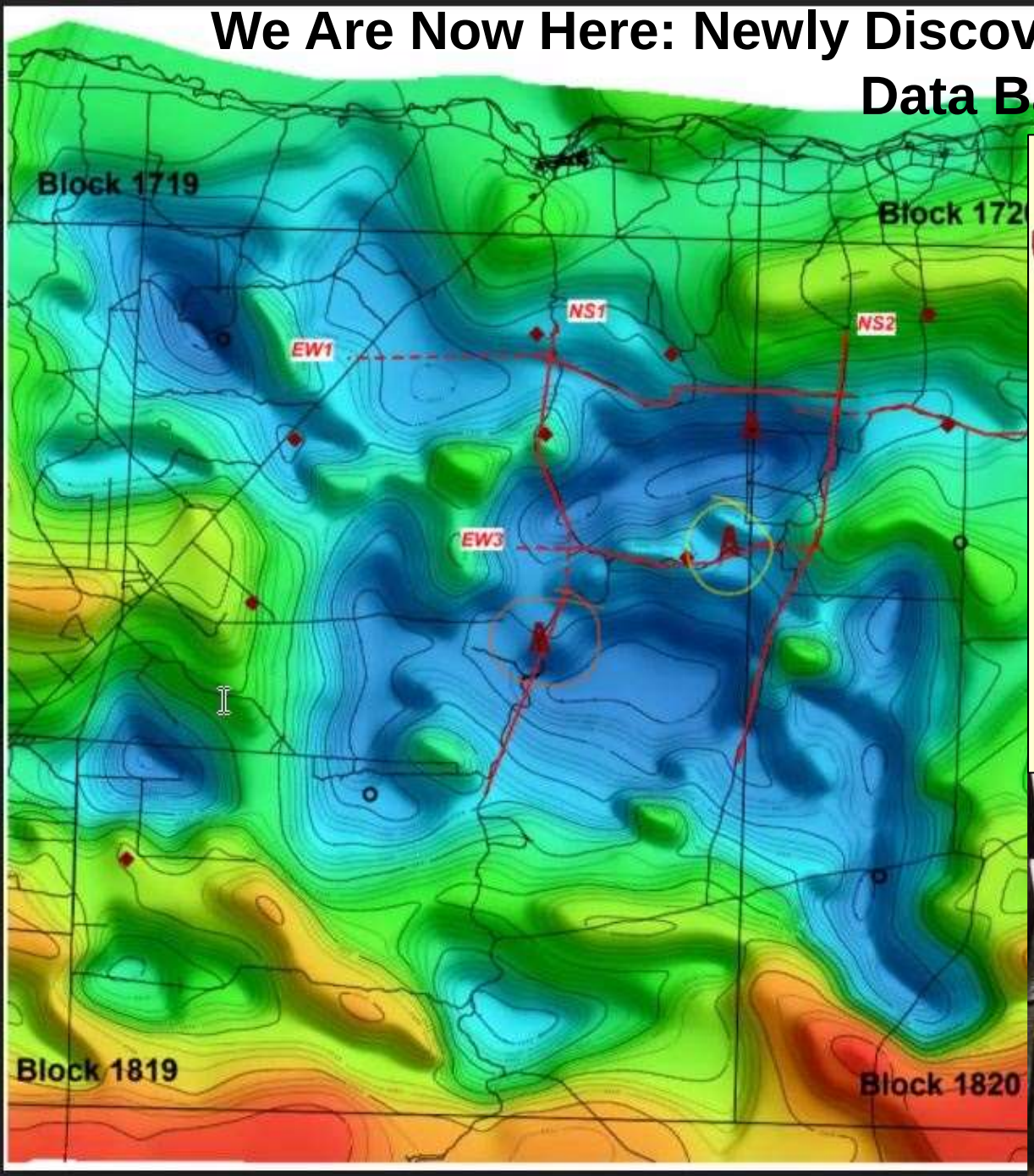
Source: www.namcor.na

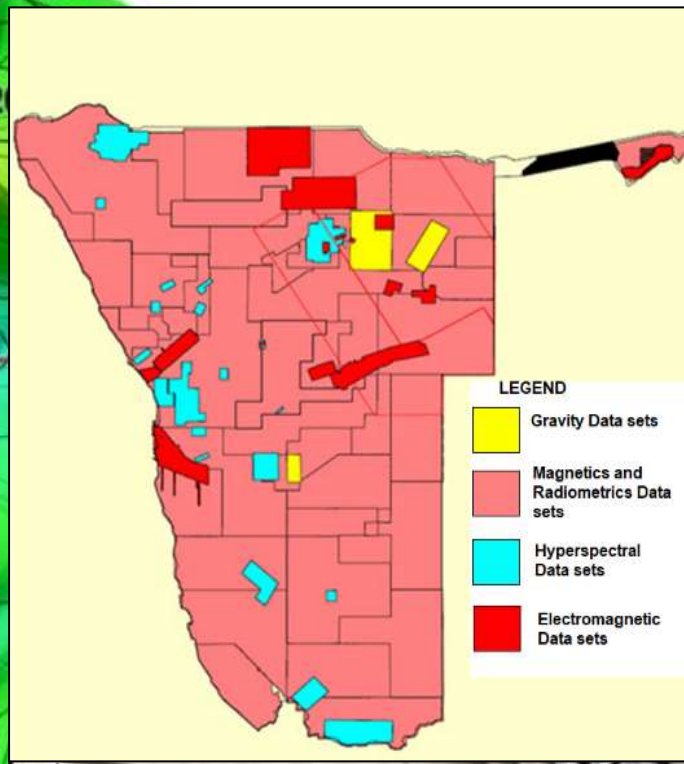
Expensive and High Risk Journey of Petroleum Exploration

Exploration programme is implemented in order to validate a developed theoretical hydrocarbon model and generate enough high-quality data that can de-risk the financial exposure to the investors funding the project. **Each of the following stages 2-5 requires separate EIA and EMP processes inclusive of stakeholder consultations to get ECCs**:

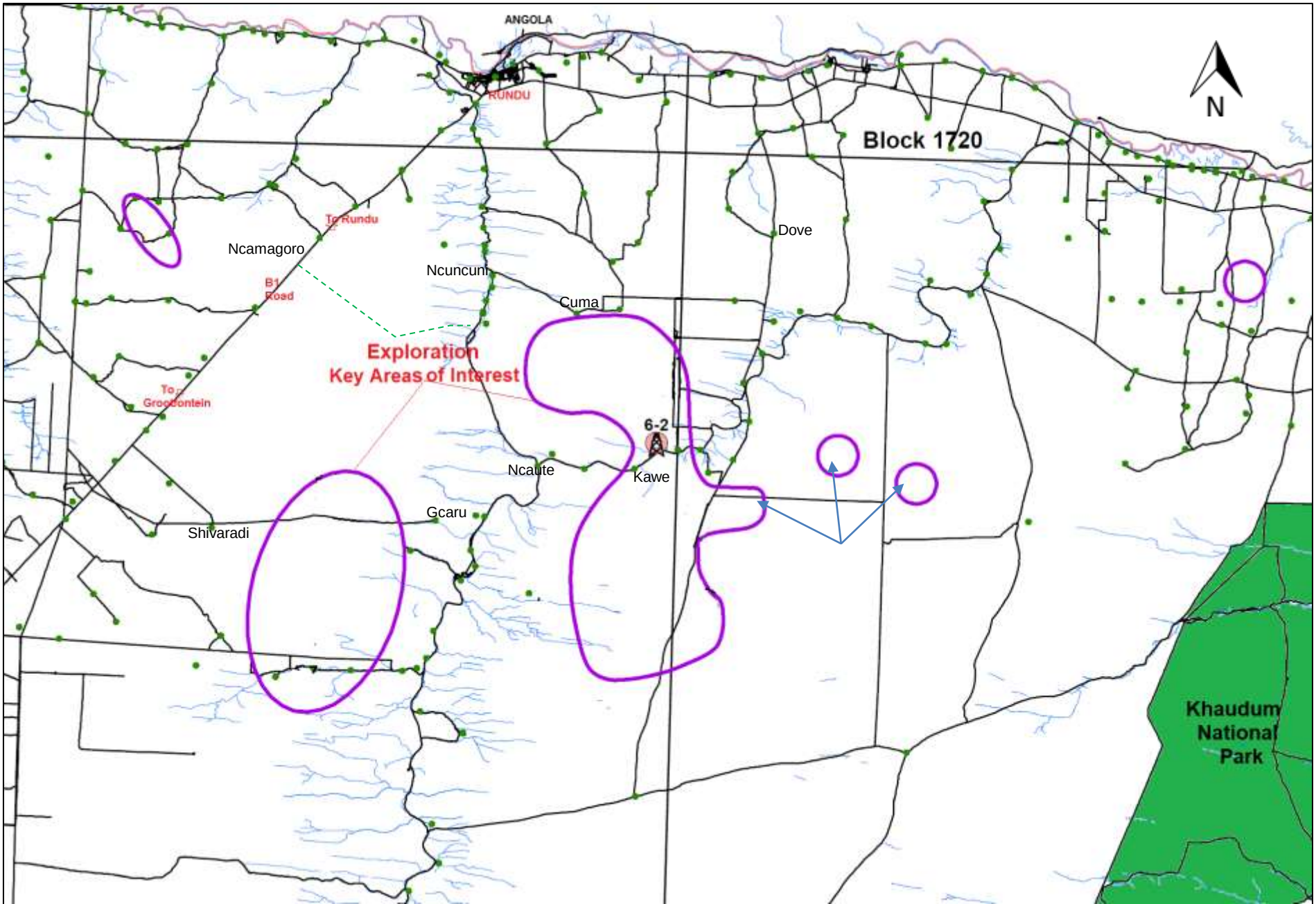
- ✓ **Step 1**: An applicant develops a theoretical hydrocarbon model and apply for a license.
- ✓ **Step 2**: Collect key data sets pertaining to the geology, aerial gravity, magnetics and stratigraphic well drilling (**ReconAfrica is now at this Stage of confirming the existence of the newly discovered Kavango Sedimentary Basin based on aerial geophysical data sets**).
- ✓ **Step 3**: Once the sedimentary basin has been confirmed from stratigraphic wells drilling, 2D seismic surveys will be used to search for potential geological structures (reservoirs) that **may** hold economic oil or gas within the AOI (Next Scope of Work and this meeting)
- ✓ **Step 4**: Geochemical Sampling or 3D seismic or exploration well drilling may be undertaken on the identified geological structure based on the results of the seismic survey in order to test if the seismic survey delineated geological structure/s contains any economic oil or gas.
- ✓ **Step 5:** If the drilled exploration well is dry it will be capped and abandoned safely. If there is oil or gas discovered, then appraisal well drilling operations may be undertaken to test the size and economics of the discovered oil or gas field. It is during the EIA for commercially discovered oil or gas possible production from either a conventional reservoir (with natural pores and permeability) or unconventional reservoir (natural pores but limited permeability) that fracking may be discussed if applicable. At present Namibia has ZERO (0) commercial or economic or even indicative oil or gas discovered onshore.

We Are Now Here: Newly Discovered Geophysical – Data Based Kavango Basin

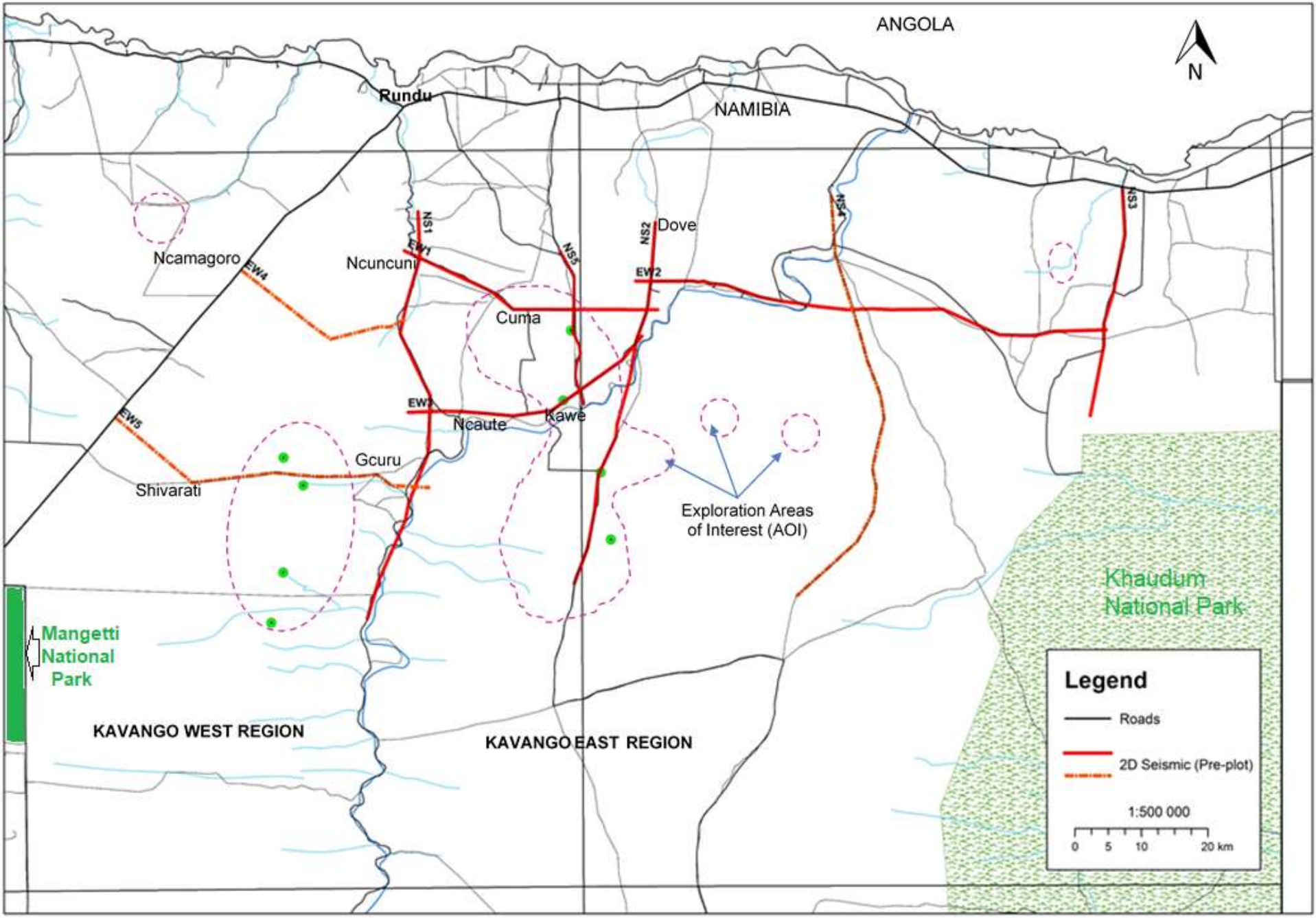




Kavango Basin AOI, Villages and Existing Roads



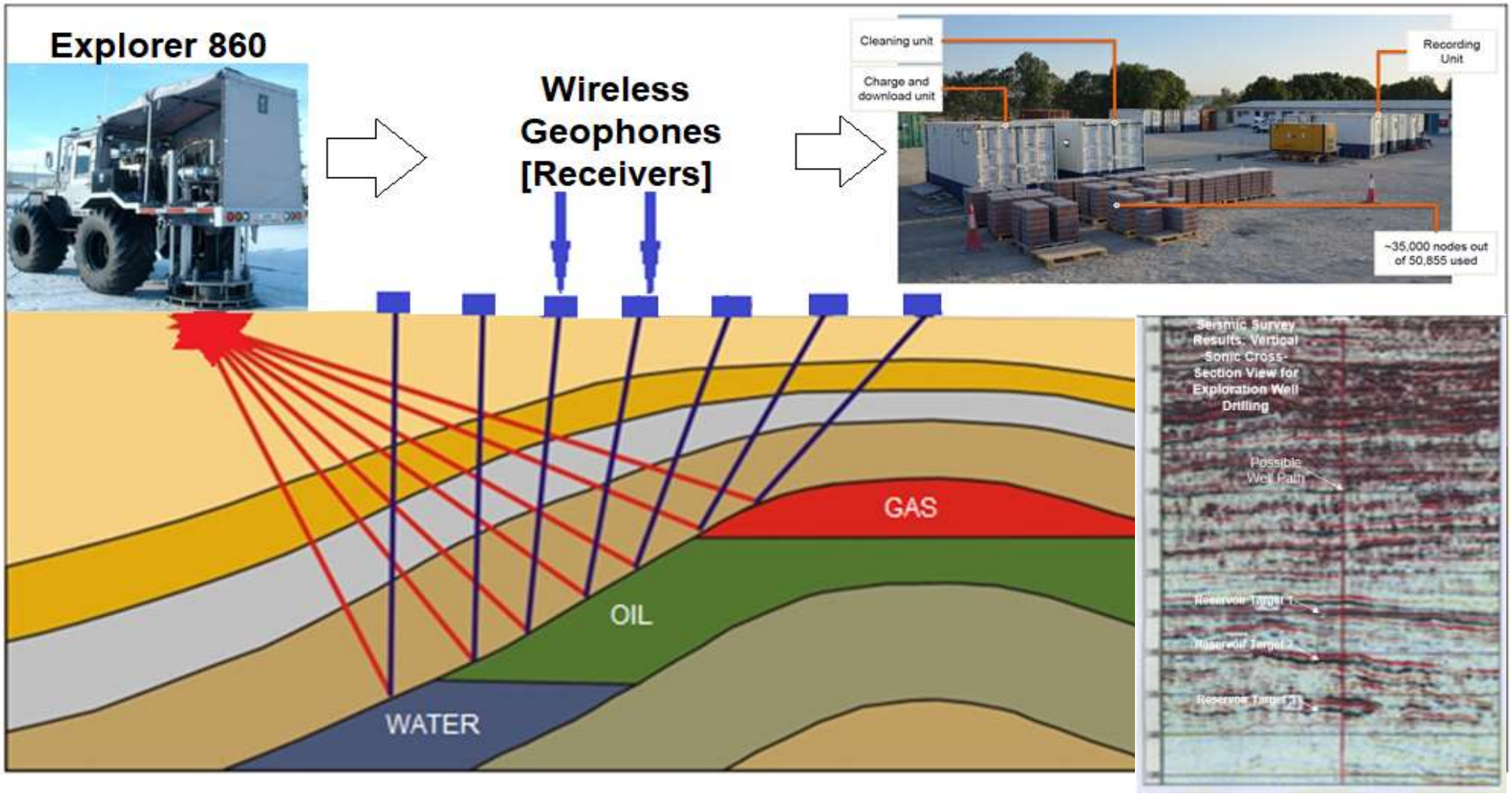
Detailed Proposed 450km long 2D Seismic



Terms of Reference (ToR)

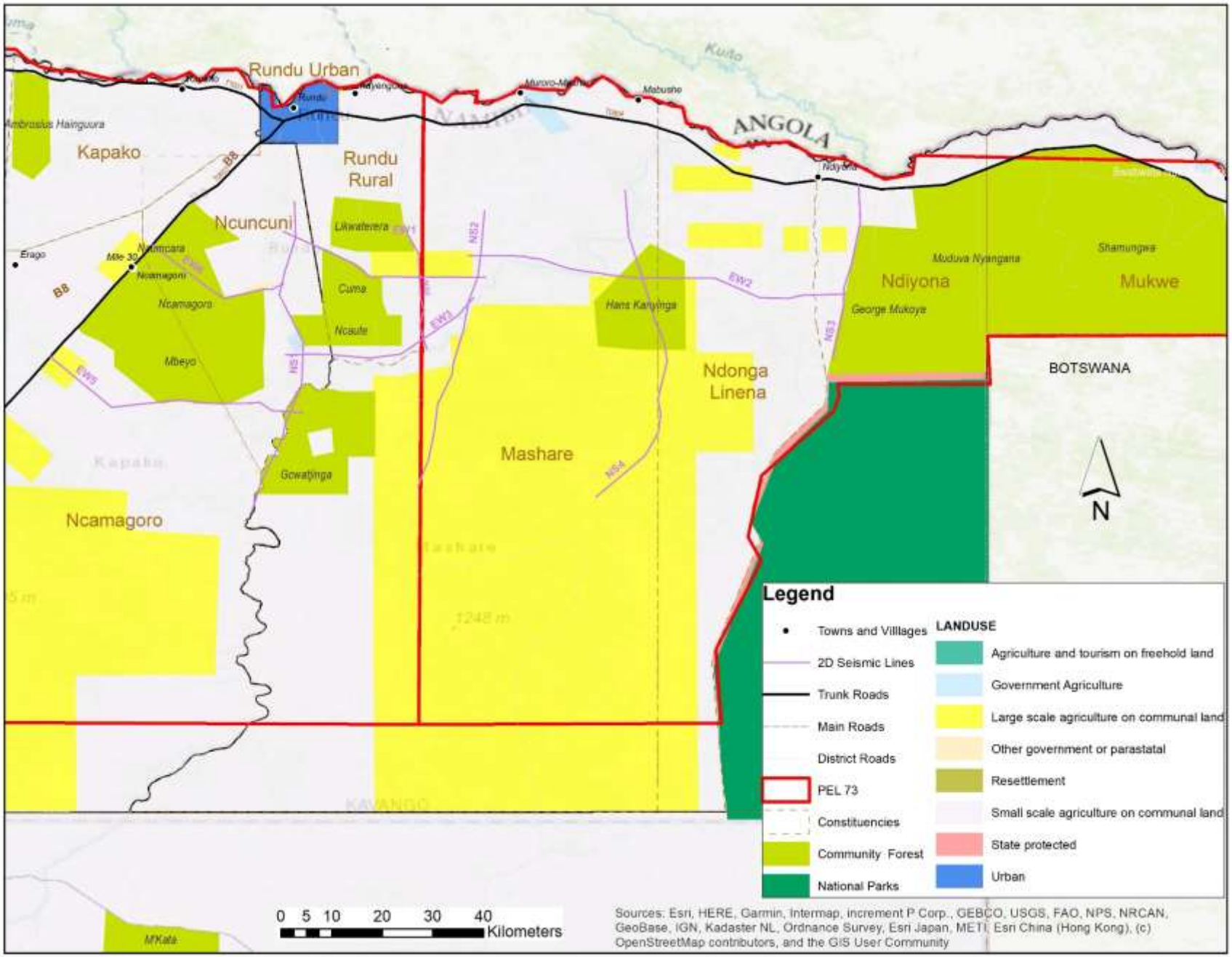
PROPOSED 2D SEISMIC SURVEY PROJECT ACTIVITIES	ALTERNATIVES CONSIDERED	KEY ISSUES EVALUATED AND ASSESSED WITH ENVIRONMENTAL MANAGEMENT PLAN (EMP) / MITIGATION MEASURES PREPARED	
(i) Planning and mobilisation (Pre-survey preparation). (ii) Camp sites setups and widening of tracks and creation of limited new access as may be applicable. (iii) Actual data acquisition, and. (iv) Demobilisation and Closure (Survey Completion).	(i) Survey location with respect to the PEL and Area of Interest (AOI) (ii) Profiles / survey lines kms length and location (iii) Energy source (Vibroseis, Explorer 860 or Dynamite) (iv) Receivers / Geophones (Wireless or Cabled) (v) Other alternative land, roads and tracks uses (vi) Ecosystem Function (What the Ecosystem Does (vii) Ecosystem Services (viii) Use Values (ix) Non-Use, or Passive Use (x) The No-Action Alternative	Potential land use conflicts / opportunities for coexistence between proposed exploration and other existing land uses such as agriculture, community forestry, timber harvesting conservation and tourism	
		Physical Environment	1. Water quality 2. Physical infrastructure and resources 3. Air quality, noise, and dust 4. Landscape and topography 5. Soil quality 6. Climate change influences.
		Biological Environment	1. Habitat 2. Protected areas and resources 3. Flora 4. Fauna 5. Ecosystem functions, services, use values and non-use or passive use.
		Socioeconomic, cultural, and archaeological environment	1. Local, regional, and national socioeconomic settings 2. Subsistence agriculture 3. Community forestry 4. Tourism and recreation 5. Cultural, biological, and archaeological resources
		Environmental Management Plan (EMP) Providing Mitigation Measures and Monitoring Plan	Mitigation shall focus on the following in order of preference: 1. Enhancement, e.g. provision of new habitats and local additional infrastructure through clearing appropriate tracks that local community can use to improve accessibility in area; 2. Avoidance, e.g. use of only existing roads, tracks and disturbed areas and use of alternative equipment design such as the use of Explorer 860 instead of Vibroseis to avoid effects on ecological receptors; 3. Reduction, e.g. limitation of effects on receptors through survey design changes; and 4. Compensation, e.g. Payments on crop fields and improved accessibility for the local communities.

Illustration of the Proposed 2D Seismic Survey

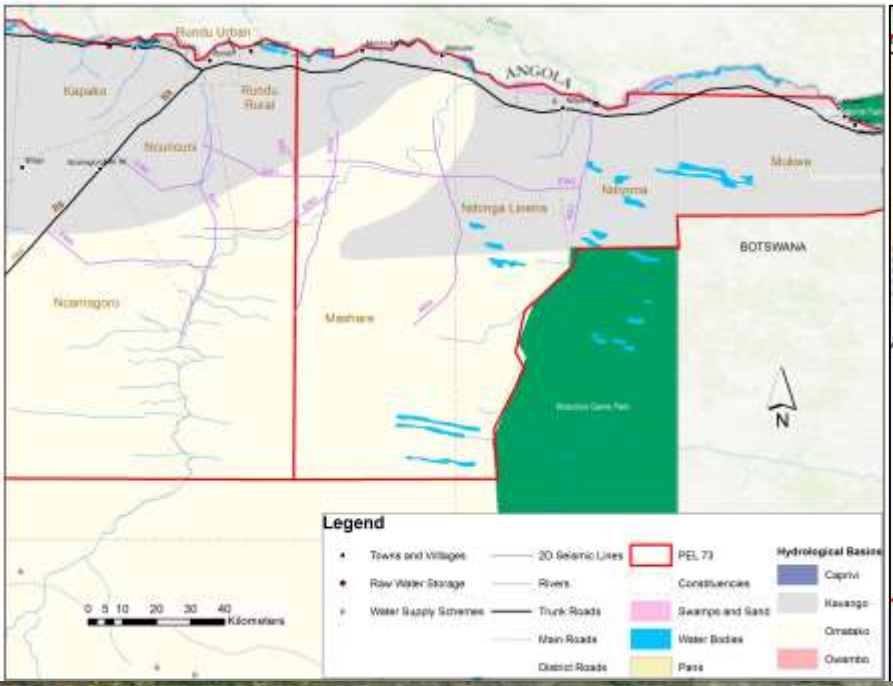


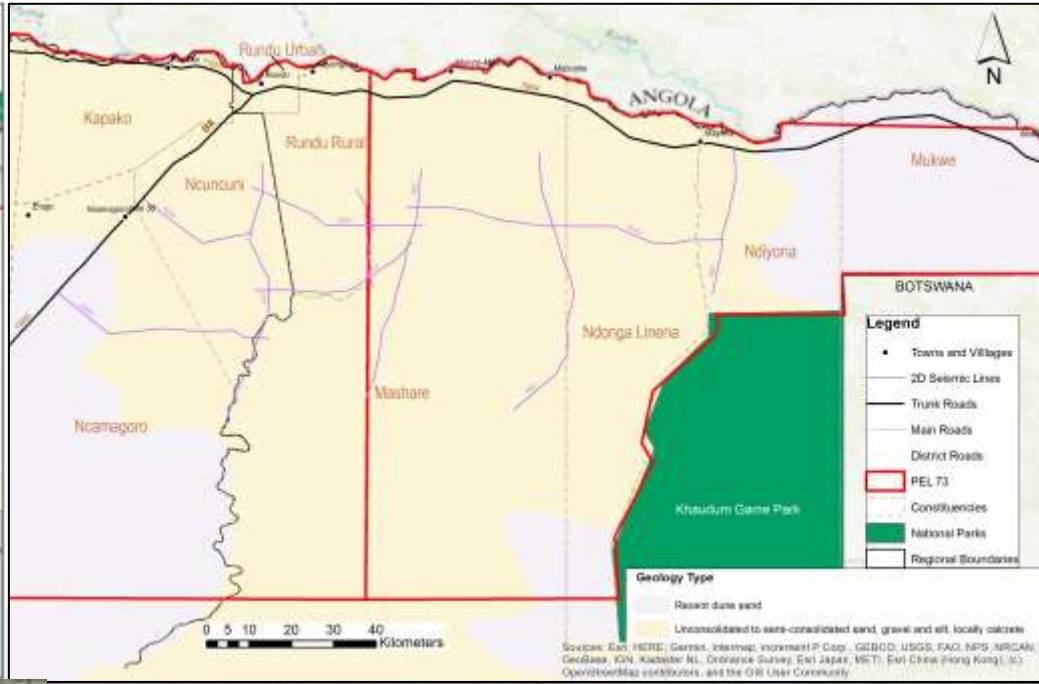
2D Seismic Survey Equipment

Proposed 2D Seismic Survey Lines Locations and Land Uses



Hydrology, Hydrogeology, Geology and Archaeology around the AOI





RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF STAKEHOLDERS ENGANGEMENT MEETING

Ministry of Environment, Forestry and Tourism (MEFT), Kavango East, Rundu

MEETING DETAILS	
DATE	18 January 2021
TIME:	10:00
VENUE:	AMTA Auditorium, Rundu, Kavango Region
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaisance Energy Africa (Pty) Ltd (ReconAfrica). Dr. Mwiya then introduced ReconAfrica's Environmental Social and Governance (ESG) Director Ms. Claire Preece as a guest speaker. Other key

Current Environmental Challenges Around the AOI

1. Large parts of the Omuramba Omatako has become degraded as a habitat due extensive agriculture with serious potential for groundwater and surface water pollution

2. Logging of Zambezi/Rhodesian Teak is evident throughout the area

3. Many areas close to the various tracks and roads and along the Omuramba Omatako and associated ephemeral river channels are clear cut for subsistence farming

Baseline Environment Conclusions: We at the Cross Roads on the effects of inherited indigenous generational poverty, under development, lack of economic opportunities, land uses pressures, environmental protection, sustainable recourses utilisation and Climate Change.

The Omuramba Ephemeral River: *Degraded as a habitat due extensive agriculture with serious potential for groundwater and surface water pollution*

Positive Impacts of the Proposed 2D seismic Survey (Project Motivation)

1. 3-4 months contractual employment opportunities for the local communities during the survey operations.

2. Payment of the annual license rental fees to the Central Government averaging N$2 million per year and this is vital revenue streams for the State paid by all petroleum exploration companies in Namibia and for the benefit of all Namibians.

3. USD50, 000.00 annual contributions to the Petroleum Training and Education Fund (PETROFUND) paid by all petroleum exploration companies in Namibia. The PetroFund provides local regional and international bursaries and scholarships to seventy (70) Namibians annually.

4. Expansion of the subsurface knowledge-base: The seismic survey data to be generated will be highly useful in the search for other subsurface resources such as minerals, water, geothermal and general geoscience research and development.

5. Contribution to the subsurface knowledge-base that will promote the coexistence of subsurface operations with other land users in Namibia.

6. Contribution to the development of local infrastructures such as rural water supply through CSR that the Proponent is current supporting in Kavango East Region.

Framework for Assessment of Likely Negative Impacts of the Proposed 2D Seismic Survey Operations

RECEIVING ENVIRONMENT SENSITIVITY

SENSITIVITY RATING		CRITERIA
1	Negligible	The receptor or resource is resistant to change or is of little environmental value.
2	Low	The receptor or resource is tolerant of change without detriment to its character, is of low environmental or social value, or is of local importance.
3	Medium	The receptor or resource has low capacity to absorb change without fundamentally altering its present character, is of high environmental or social value, or is of national importance
4	High	The receptor or resource has moderate capacity to absorb change without significantly altering its present character, has some environmental or social value, or is of district/regional importance.
5	Very High	The receptor or resource has little or no capacity to absorb change without fundamentally altering its present character, is of very high environmental or social value, or is of international importance.

SOURCES OF POTENTIAL IMPACT				PHYSICAL ENVIRONMENT						BIOLOGICAL ENVIRONMENT					SOCIOECONOMIC, CULTURAL, AND ARCHAEOLOGICAL ENVIRONMENT				
				Water Quality	Physical infrastructure and Resources	Air Quality, Noise and Dust	Landscape Topography	Soil Quality	Climate Change Influences	Habitat	Protected Areas	Flora	Fauna	Ecosystem functions, services, use values and non-Use or passive use	Local, regional, and national socioeconomic settings	Subsistence Agriculture	Community Forestry	Tourism and Recreation	Cultural, Biological and Archaeological Resources
	ROUTINE AND PHYSICAL PRESENCE OPERATIONAL ACTIVITIES	1.	Planning and mobilisation (Pre-survey preparation)																
		2.	Camp sites setups and widening of tracks and creation of limited new access as may be applicable																
		3.	Actual data acquisition along the individual profiles / survey lines																
		4.	Demobilisation and Closure (Survey Completion)																
	UNPLANNED ACCIDENTAL EVENTS	5.	Any accidental event that may be associated with the routine and physical presence operational activities																

Conclusions and Way Forward

1. The proposed 450km long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks.

2. Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for ECC.

3. We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.

4. Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Ncaute, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.

5. However, in order to fund the journey to the intended destination which is Ncaute, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.

6. We look forward to receiving your inputs and the deadline for submission of inputs is **Friday, 12th February 2021**

Question, Discussions, Inputs and Meeting Closure

1. **Question and Discussions for the Proposed 450km Long 2D Seismic Operations in Petroleum Exploration License (PEL) No. 73 covering the AOI**

2. **Meeting Closure**

For more information Please contact Dr Sindila Mwiya (EAP)
Mobile: +264-811413229
Emails: smwiya@rbs.com.na or frontdesk@rbs.com.na
Risk-Based Solutions (RBS) cc – *Delivering De-Risked Solutions*

Annex 3-4 - Posters Consultation Materials

March 2021

Proposed North-South (NS) 2D Seismic Survey Lines

1. **Line NS-1 runs along the D3425 road from Rundu to Ncaute**

2. **Line NS-2 runs along the existing tracks linking Dove to the D3400 and contuses along the D3400 into exiting track at Shakambu Lower Primary School and crosses the Omatako River towards the south.**

3. **Line NS-3 runs along the existing 4 by 4 from the north at the B8 Katere junction following the sandy track to Khaudum National Park.**

4. **Line NS-4 runs along the D3400 linked to the B8 and continues south into existing tracks.**

5. **Line NS-5 runs along the new Rundu to Mbambi Roads D3448 and D3468 from the junction to Cuma along the new D3401 Road**

Proposed East-West (EW) 2D Seismic Survey Lines

1. **Line EW-1 runs along the new D3401 Road from Ncuncuni to Cuma passing through the community forestry**

2. **Line EW-2 runs along the existing D3400 and passing through the community forestry.**

3. **Line EW-3 runs along the D3400 Road from western junction of the D3425 road from Rundu to Ncaute through Kawe (current stratigraphic well drilling location).**

4. **Line EW-4 from western B8 junction runs through an existing Community Forestry track to Hamoye situated along the D3400 Road from Rundu to Ncaute.**

5. **Line EW-5 runs along the existing track from the western B8 junction to Gcaru through Shivaradi**

Climatic, Fauna, Flora, Habitats around the AOI

- The mean annual summer rainfall is highly variable between 400-600 mm with mean annual gross evaporation is between 2600-2800 mm
- Socioeconomic centred on subsistence agriculture, timber & grass harvesting, cattle heading with obvious inherited generational poverty, under development and lack of economic opportunities
- Fauna: Cape rough-scaled lizard (Ichnotropis capensis) and Damaraland mole-rat (Cryptomys (Fukomys) damarensis observed during field work
- Protected Flora: Baikiaea plurijuga (Zambezi teak), Burkea africana (burkea), Guibourtia coleosperma (false mopane), Schinziophyton rautanenii (manketti), Pterocarpus angolensis (kiaat), Strychnos species (monkey orange spp.) observed along the roads

Annex 3-5 - Minutes of Stakeholders, Public, Communities Meetings & Attendance Register-JAN-MAR 2021

March 2021

participants introduced during the meeting included Mr. Shakwa Nyambe as the Energy, Natural Resources, Commercial and Dispute Resolution Consulting Lawyer. The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators. The Ministry of Environment, Forestry and Tourism (MEFT) invited officials were also given the opportunity to introduce themselves. Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 in the Kavango Region

2. PRESENTATION

Dr. Mwiya facilitated the meeting and provided an overall perspective of the EIA process for the proposed 2D Seismic Survey continued with a PowerPoint Presentation that covered the following topics:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey.
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process;

A Draft Environmental Scoping report was distributed to all attendees for reference and discussion where required. Prior to the meeting, electronic versions of the draft reports were also distributed via email correspondence.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table.

4. SITE VISIT (SEISMIC SURVEY LOCATIONS)

A site visit orientation/ field excursion with the MEFT officials was undertaken to the proposed 2D seismic survey lines locations. Due to the remoteness of the survey lines, long distances they cover and that some survey lines require 4x4 driving at most times, the site visit field excursion/ orientation was split into two days on the 18th and 19th of January 2021 covering locations within the communal areas of Ncamagoro and Mashare Constituencies of Kavango West and East respectively. Dr Mwiya site visit illustration made reference to information presented in the Draft Scoping Report including survey lines Maps and camera drone images. A camera drone was also used during the field excursion to demonstrate how the High Definition images presented in the Draft Scoping Report were taken and the extent of the existent gravel access roads that could only be captured at an elevated ariel imagery "footage". The proposed 2D survey lines localities visited, and corresponding localities are presented in Table 1. Figure 1 presents a photo with the MEFT officials during the site visit at Survey line EW5 (western extension). In addition to the proposed survey lines localities, the site visit was extended to the existing Well exploration drilling site at Kawe. This was required to familiarise the MEFT officials with an actual exploration drilling operational site looks like.

Table 1: Site Visit localities

Date	Site visit Location	Survey line
18 January 2021	Ncamagoro	EW4
		EW5
	Ncuncuni	NS1
19 January 2021	Gcaru	NS1 (southern extension)
		EW5 (western extension)
	Ncaute, Kawe, Cuma	EW3, NS5, EW1,
	Kawe, Mbambi	(6-1 and 6-2) Stratigraphic Well construction sites.

Figure 1: Site Visit with MEFT on Survey line EW5

5. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation and way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.

- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

6. CLOSE

The Stakeholders Engagement Meeting ended at 12:00 with site visit observation completed on the 19th of January 2021.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	We must substantiate social corporate responsibility especially when dealing with foreign investors, As the custodian of environmental matters in this country, our interests are not just to uplift or enhance social economic welfare we also look at the likely repercussions associated with exploration activities on the environment including such as fauna and flora. Specific attention to petroleum is the void it can create through the extraction process and global contribution to CO2 emissions. We will not only focus on localized impacts but look at a global scale also. A response was given such that ReconAfrica will ensure compliance to all the local regulations. Conducting this stakeholder engagement is complying to the EIA regulations. The EIA process takes accountability of all aspects associated with each activity proposed to be implemented. The proposed Oil and Gas Exploration project is being implemented into phases, each phase requires an EIA process undertaken. An EIA process for the ongoing stratigraphic well drilling operation has already been done and an ECC from MEFT has been issued. We are now focused on the proposed 2D Seismic Survey activities and not oil production activity. We are on a journey to that discovery and at this stage we so far away to that destination. We are just at the initial stage. In addition to the EIA process, the petroleum agreement specifications on environmental compliance is so detailed than the EIA regulations can provide. Every stage in the petroleum exploration process requires various commitments to both environment and social aspects.
2.	A question was raised regarding wether the delineated 2D Seismic lines would run beyond the area of interest? A response was given such that, the proposed 2D seismic survey lines would extend beyond the area of interest, this is required to understand the extent of subsurface structures and the potential hydrocarbon reservoirs that could be associated in basin margins. It is in these basin margin that feasible hydrocarbon could be found.
3.	A question was raised relating to how often the Seismic survey equipment would “Explorer 860” would have to move back and forth to collect the required readings during the process of surveying.

No.	Questions / Comment / Issue raised
4.	A question was raised regarding the potential impact associated with the emitted seismic energy wavelengths into the ground on wildlife. This aspect was compared to marine mammals such as dolphins that use wavelength to get around places, would the emitted energy have any implications on wildlife including elephants in the area. A response was given such that, a biodiversity specialists study is part of the EIA process. The findings from the study would be presented at a later stage. It was also further emphasized that elephants' migratory routes are not in the specific areas where seismic surveys would be undertaken. Elephants use wavelengths at night, seismic activities are only undertaken at daylight.
5.	A question was raised regarding how long the seismic operation would be undertaken? A response was given such that, the proposed 2D seismic operation will be implemented into different phases including Pre-survey scouting, Planning and Mobilization of equipment, The actual survey activity, Demobilization and completion of the survey. This could be executed within a 3 months period. However, the survey can't be undertaken without an EIA process and approved ECC.
6.	Community forests are part of the EPL area, how will these be managed? A response was given such that, the proposed 2D seismic survey lines are within already existent and disturbed gravel access roads to various locations including settlements. No forests are proposed to be cleared. Certain access routes may be too narrow, however, shall the community within the area of interest request the assistance in widening these roads, appropriate measures will be undertaken through consultation with the Forestry Department.
7.	Based on the Seismic Survey map presented, clarity was required regarding the number of stratigraphic wells to be drilled based on the existing ECC? A response was given such that, 3 wells have been approved as illustrated on the Map.
8.	Will the proposed 2D seismic survey lines be undertaken only to extend into the area of stratigraphic wells? A response was given such that, sedimentary basin margins are potential traps for oil reserve structures and therefore the boundary of the survey lines are extended beyond the specific area of interest to de-risk potential error in the survey.
9.	Clarity was requested on further illustration on how the current EIA process for the 2D Seismic Survey fits in with the existing stratigraphic well drilling operations at Kawe. A response was given such that a petroleum exploration programme is implemented into 5 different phases, phase 2 to 5 requires a separate EIA process for each phase. ReconAfrica is currently on phase 2 of the project implementation that pertains to the collection of key data sets including the geology, aerial gravity, magnetics and stratigraphic well drilling. An EIA was already undertaken for the ongoing Stratigraphic well drilling operation required to

No.	Questions / Comment / Issue raised
	confirm the sedimentary basin and MEFT approved the project in 2020 by issuing an Environmental Clearance Certificate. The next step in the process is to undertake a 2D seismic survey to understand the extent of the sedimentary basin, to search for potential geographical structures/ reservoirs within this basin that may hold feasible commercial oil or gas. The EIA process is currently for this 2D Seismic Survey.
10.	A question was raised as to whether any seismic activities are being undertaken currently? A response was given such that, no such activities are being implemented without an EIA process. We are at the Scoping phase of the EIA for the proposed 2D seismic activities until at such time an ECC is issued then we can implement the Seismic activities.

APPENDIX 2: Attendance Register

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (13 JAN 2021)

NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
J.S Niipadle	MEFT-DoF	0811599403	niipaes@yahoo.co.uk	
Moses M.	MEFT-DOF	0878669425	[illegible]	
Saima Angula	MEFT	0811222126		
Fillemon Kayoja	MEFT	0812690197	fillemon.kayoja@meft.gov.na	
Apollo Kannyinga	MEFT	0811464788	@meft.gov.na apollinaris.kannyinga	
Elis. Jikuua	MEFT	0812931088	jikuuaemain@gmail.com	
Claire Preece	ReconAfrica		claire.preece@reconafrica.com	
Cavalline A. Gaoseb	MEFT	+264811406406	cavalline.gaoseb@meft.gov.na	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (18 JAN 2021)

NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
F.S. Mayumbo	Risk-Based Solution	0812719171	fidelelio2012@gmail.com	
Meriam Kanyem	R.B.S	0818767555	MKanyem R.B.Sol	
Hiskia Mbaue	MET-DEAF	0812931568	hiskia.mbaue@met.gov.na	
Nick Steinsberger	ReconAfrica		nick.steinsberger@reconafrica.com	

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF PUBLIC CONSULTATION MEETING (MORNING AND AFTERNOON SESSION)

Kavango West Region, Nkurenkuru,

MEETING DETAILS	
DATE	20 January 2021
TIME:	10:00- 13:00 and 15:00- 18:00
VENUE:	Nkurenkuru Community Hall, Nkurenkuru
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2 (Morning Session) and Appendix 3 (Afternoon Session).

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). Dr. Mwiya then introduced ReconAfrica's Environmental Social and Governance (ESG) Director Ms. Claire Preece as a guest speaker. Other key participants introduced during the meeting included Mr. Shakwa Nyambe as the Energy, Natural Resources, Commercial and Dispute Resolution Consulting Lawyer. The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators. Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 in the Kavango Region. A key note address was offered by the Regional Governor of Kavango West Region, Hon. Sirkka Ausiku and that acknowledged all the invited guests including:

- Hompa Alfons Kaundu, Mbunza Traditional Authority
- Hon. Johannes K. Sikondo, Councilor of Ncamagoro Constituency
- Hon. Leopoldine Nseu, Councilor of Ncuncuni Constituency
- His Worship Jafet Muti, Mayor of Nkurenkuru Town
- Hon. Liveve Angelius, Charperson of the Management Committee
- Senior Service and Government officals
- Dr. Sindila Mwiya, Risk Based Solutions and Claire Preece of ReconAfrica
- Religious leaders

Hon. Ausiku acknowledged Dr Mwiya for organising the meeting and requesting the Governor's office to facilitate and identify stakeholders to attend the public consultation meeting. The governor further elaborated that, this was not the first time such a meeting has been arranged by Dr Mwiya, as previous consultations with him had also been undertaken through the office. The Governor then highlighted that to understand regional development challenges, The Regional Development Profile and Regional Economic Investment opportunities policies have been developed. Agriculture, Manufacturing and mining are among the sectors the region has identified and believes would improve the social economic status of the region and uplifting the livelihood of the local communities. The governor's office welcomes the various investors in these sectors. The governor believes a project such as Recon Africa's proposed Oil and Gas exploration will contribute in alleviating poverty in the region. The governor also requests ReconAfrica to directly support the Regional Development Fund for the Kavango West.

2. PRESENTATION

Dr Mwiya facilitated the meeting and provided an overall perspective of the EIA process for the proposed 2D Seismic Survey continued with a PowerPoint Presentation that covered the following topics:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

A Draft Environmental Scoping report was distributed to all attendees for reference and discussion where required. Prior to the meeting, electronic versions of the draft reports were also distributed via email correspondence.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the Morning public meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below is a picture to the public consultation meeting.

Figure 1: Public Consultation meeting at the Nkurenkuru Community Hall in Nkurenkuru, Kavango West Region.

The afternoon session allowed an opportunity for the public to walk in and ask questions, a group discussion was also offered by Dr Mwiya. Marvin Sanzila (RBS) also assisted with group discussions through posters illustration (Figure 2). Similar questions were asked, and these have been incorporated in Appendix 1. The attendance register for the afternoon Session is also presented in Appendix 3.

Figure 2: Poster illustrations for the Afternoon public consultation session

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation and way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The public consultation meeting ended at 18:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	(NOT RELEVANT TO SEISMIC PROJECT) A question was raised such that, shall the Oil and Gas Exploration turn out positive, where will the produced product be sold? A response was given such that the focus at this stage is the application for an Environmental Clearance Certificate (ECC) required for the 2D Seismic Survey. The 2D Seismic survey together with the ongoing Stratigraphic Well drilling operations will determine the existence of the sedimentary Basin and whether feasible petroleum reservoirs exists in the Area of Interest (PEL. 73), Kavango region. Shall the exploration drilling operation result in positive findings an entirely different process will have to be applied prior to the actual production. At this moment we are only collecting data and don't know oil exists.
2.	The general public is quite concerned due to the circulation of information from various media channels highlighting that the proposed Oil and Gas Exploration project will have adverse environmental impacts on the groundwater, the Kavango river banks and flora, can this be clarified? A response was given such that, based on the presentation given relating to the project background its location, the proposed 2D Seismic Survey activities that will be undertake in already existing road infrastructure. It is evident that the information shared in the public by the different media is wrong.
3.	A suggestion was raised such that public feedback sessions should be extended for a longer period to allow sufficient time for the public to raise their concerns relevant to the project.
4.	A question was raised as follows: Shall the proposed 2D Seismic survey result in positive findings on or close to a communal land belonging to a farmer, there is fear that the owner of that land has no exclusive rights to overrule the state's decision to go ahead with the actual production on that specific land. Will the owner of the land be relocated and how will this negotiation be undertaken? A response was given as follows: In Namibia there are various laws that governs access to exclusive rights to natural resources. The State has exclusive rights to Subsurface natural resources a process is followed in order to obtain access to these resource in this regard the Petroleum Exclusive Licenses relates to subsurface rights of petroleum exploration and possible production. ReconAfrica has applied for access to the subsurface rights in this regards PEL 78. In order for ReconAfrica to exercise these rights to conduct 2D Seismic Survey although these activities will be undertake in already existing roads there may be

No.	Questions / Comment / Issue raised
	certain sections of these road that may require widening or certain sections that could cross through communities, it is relevant in this regard to consult the surface rights owners in this regards the Traditional Authorities, headmen's and the local community in these areas prior to any activities. Shall seismic survey lines infringe on farming grounds or crop fields, there would be a sort of compensation agreement with the surface rights owner i.e. owner of the field, there is no need for relocation or move structures due to seismic activities this also applies to oil production, shall oil be discovered on your land it could be accessed from a different location without infringing on any of your surface rights activities. Shall there be a discovery of Gas, a similar process of consultations and agreements would be applied.
5.	During the public meeting it was acknowledged that the information presented from the presentation offered by Dr Mwiya and the posters displayed providing more additional information is totally different from that which the media has been sharing to the public. That specific information from the media has created a lot of fear and misunderstanding among people and their communities. We would like to encourage ReconAfrica to continue with the public consultations' meetings in the different communities especially at Ncuncuni, Ncamagoro and the surrounding communities at Kawe and Mbambi. Most of the questions and comments raised in this meeting are based on information currently circulating in the public. The meeting today clearly details the approach that only relates to collection of data at this stage.
6.	What is the long-term environmental impact that could result from the seismic operation in 5 to 10 years from now. A response was given as follows: Taking into consideration this is an EIA process at the Scoping phase and understanding the background to the seismic survey activities and proposed location within existing infrastructure, there is no long-term environmental impacts associated with the proposed 2D Seismic survey.
7.	Relevant to the seismic Survey, are you aware of community forests and conservancies both in the West and East regions of Kavango? There could be community members against the project perhaps due to the activities being undertaken in the community forests or the conservancies or within the boundaries. A response was given as follows: All the proposed 2D seismic survey lines will be undertaken in already existing roads. Relevant to the question and taking an example of the proposed survey line EW4 in Ncuncuni constituency. This line is through a community forest. However, it is through an existing access road that's being used by the community and the Forestry department of the Ministry of Environment Forestry and Tourism (MEFT) that we will be working closely with on this project. Another example is the EW1 survey line through the community forest, this line is in an existing gravel highway used by daily commuters and trucks.

No.	Questions / Comment / Issue raised
8.	How are you going to manage people that leave closer to the drilling operations and what are the distance restrictions from the area of operation. Refer to response point 4.
9.	Is there going to be feedback to the public after the data collection on both the seismic survey and stratigraphic well drilling operations have been undertaken? A response was given such that, there will be information sharing meetings after the process has been completed.
10.	A question was raised on whether an EIA process was undertaken for the current stratigraphic well drilling operation, does the current EIA process include both the ongoing drilling operation and proposed 2D seismic survey? A response was given such that a petroleum exploration programme is implemented into 5 different phases, phase 2 to 5 requires a separate EIA process for each phase. ReconAfrica is currently on phase 2 of the project implementation that pertains to the collection of key data sets including the geology, aerial gravity, magnetics and stratigraphic well drilling. An EIA was already undertaken for the ongoing Stratigraphic well drilling operation required to confirm the sedimentary basin and MEFT approved the project in 2020 by issuing an Environmental Clearance Certificate that is still valid. The next step (Step 3) in the process is to undertake a 2D seismic survey to understand the extent of the sedimentary basin, to search for potential geographical structures/ reservoirs within this basin that may hold feasible commercial oil or gas. The EIA process is currently for the 2D Seismic Survey.
11.	A comment was raised such that, there is a lot of misleading information presented by the printing and social media confusing the Kavango Delta which is in a different country connecting it into Namibia can ReconnAfrica organize or undertake monthly public briefings, or a press conference in order to refute some of this misleading information causing confusion in the local communities.
12.	The honorable Governor requested Mr. Isaack Viejo in attendance to give his personal experience on a 2D Seismic Survey Project he was once involved in a few years ago. Mr. Veijo emphasized the Seismic survey process previously undertaken is a very simplistic methods that only involves a Vibroseis Track as energy source and a team of local residents plotting wireless recording instruments and removing them. No relocations of communities, or damage to building facilities or any impacts on the environment were experienced.

No.	Questions / Comment / Issue raised
13.	A question was raised such that, after the data acquisition process of the stratigraphic well drilling and 2D seismic survey present positive findings, who is the proponent that will be appointed to undertake the production phase of the Oil and Gas. Will this data be sold off to a different entity? A response was given such that, the focus at this stage is the proposed stratigraphic well drilling and 2D seismic survey. ReconAfrica and the Namibian government have entered into a petroleum agreement for these activities. Shall the exploration activities prove positive finding, a totally different process will be implemented based on the petroleum agreement requirements.

APPENDIX 2: Attendance Register (Morning Session)

10–12:30
Meeting

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
1.	Apollinaris Kannyinga	MEFT	0811464788	apollinaris.kannyinga@meft.gov.na	
2.	I Neijo		081 423 0797	ineijo@yahoo.com	
3.	NAFTAL S. NGALANGI	IMM	0812460607	n.ngalangi@iam.edu.na	
4.	Elizabeth Hiyalwa	MICT	0611221188	ehiyalwa@gmail.com	
5	J. NAMBARA	MICT	081608960	Nambara.stefanus@mict.gov.na	
6.	WNN Polen	NAMPOL	0811483453	WNPolen@nampol.na	
7.	J Kanpoku	Nampol	0818452527		
8	Mickey Munembo	MUL	081-2722793	mickeymunembo@gmail.com	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
9.	ANDREAS M NGOMA	NCCI	0812027923	ngomaandreas77@gmail.com	
10.	Rev Hauku	FOTN	0812406699	—	
11.	Shyamba P. E.	F. A	0812363266		
12.	Mbangu	F. A	0812570118	ngomathomasm@gmail.com ~~thomasngoma@gmail.~~	
13.	Simon		0814797106	Simonnakwa7@gmail.com	
14.	N dapewoshali	Recon	0812261509	nkurenguva-shapwande@gmail.com	
15.	F Hausiku	NFA	0812591640	findlimecnthausiku.com	
16.	R. SIKONGO	NFA	0813197944	Robertsikongo@gmail.com	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
17.	Kaundu frans	Cleo Security cc	0813607270	Kaundufrans@gmail	
18.	Nsem Leopoldine	Councillor	0816375481	nsemupemba@gmail	
19.	CHRISTELLA MKENYO	KWRC	0811274962	ckwgunras@gmail.com	CKMkenyo
20.	KOTOKENI	KWYF	0813130689	K.willemk@yahoo.com	
21.	Aune Haingura	KWYF	0816510205	aunehaingura@gmail.com	Ahaingura
22.	MPONDA PITTO	KWYF	0812445523	Mpondapitto	
23.	Paulus Shihinga	NCAMAGORO Farmers Association (KW)	0811479310	shihingap@yahoo.com	
24	Josef Kandjimi	Chairperson of Pensioners	0812711041	—	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
25.	SINDIMBA P.S	NCuTC	0812183607	psimimba@gmail.com	20/01/2021
26.	O. Amutheni	Office of the Ombudsman	081160172	Oamutheni@ombudsman.org.na	
27.	J. INDONGO	Office of the Ombudsman	0811470074	Jindongo@ombudsman.org.na	
28.	Elizabeth Kannyng	Nkurenkuru Constituency	0816238677	cindy.elizab@gmail.com	
29	Johannes S.M	Mbeyo CF	0816036735	Johannes.simbaa@gmail.com	
30.	Lukano Jonas K	Ncamagoro CF	0813611565	lukanoJonas@gmail.com	
31	Stefanus LK	Min of Safety & Sec	081 279 7669	Kabom1982@gmail.com	
32.	JN /CA/CORE	MIN OF FINANCE	0812596135	Jlcakon@yahoo.com	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
33.	Mbunga K. Kamos	Shambyu T. Authority	081150149	Kalmos Kalal @gmail.com	
34	Petus Hamutenya	Kavango West Regional Council	0812210092	pinchaoch@gmail.com	
35	Tjarhu Paulus	Veterans Affairs	0811622710	ptjarhu@gmail.com	
36	JIC SIKONDO	KWRC.	081154547	Sayanee.com	
37	J. I. JOHANNES	NDF	0817692388	Junias johannes @gmail.com	
38	F. MURONGA	NDF	0814251760	Paracawa@yahoo.com	
39.	D. M. Mampondo	Nampol	0813559263	Mel19840504@g.mail	
40	J. P MARTIN	NAMPOL	0813797845		

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
41	Zepee Havanua	MIAWRL-DAPEES	0812862572	zhavarua@yahoo.com	
42	DHHAMUTENYA	SWAPO Party	0811522666	hhipulua@gmail.com	
43	J.M. Muti	NKurenkuru TC	0811479732	Mayaret@gmail.com	
44	T.N. Lasarus	UTA	0812276573	ttusnamukuwalasarus@gmail.com	
45	Ambuga E.N	MET	0813175441	eambuga@yahoo.com	
46	Kleopa S	Cf. Si	0812392783	Makuzutradinger.	
47	Ntusi mm	Kampegere	0812632803		
48	FR MALIMA NL	CATHOLIC Church	0812986767		
49	MARTIN SANZICA	RBS	0814786279	MARTINCONSULTANTS@OUTLOOK.com	

APPENDIX 3: Attendance Register (Afternoon Session)

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
1.	Haimbili Immanuel	community	0816238991, 0812705846	— Iugura	H.I.N
2	Lazarus Kahatae	Ministry of Lands	0812367076	Lazarus.kahatae mlr.gov.na	[illegible]
3	Paulus Ngoma	Community	0818786234	paulusngoma094.com	[illegible]
4	Kamungua Andreas	Community	0816824838	.	[illegible]
5	Sivewa Christine	community	0817222098		S.K.S
6	Kandjamba Naomi	Community	0818750008	Naomikandjiba@gmail.com	[illegible]
7					
8					

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN NKURENKURU, KAVANGO WEST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (20 JAN 2021)

NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
Changa	ReconAfrica	0813788871	donchanga@gmail	
Nessy.H	ReconAfrica	0812120417	nessyhe@gmail.com	
Mweue	NTC	0812263019		
Kudumo stefanus	CHAIRPERSON KEWCCFAssociation	0812251363	stefankudumo@gmail.com	
KOTOKENI W.K	KAVANGO WEST YOUTH FORUM	0813130689	K.willemk@yahoo.com	

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF PUBLIC CONSULTATION MEETING (MORNING SESSION)

Kavango East Region, Rundu, AMTA

MEETING DETAILS	
DATE	22 January 2021
TIME:	10:00- 13:00
VENUE:	AMTA Auditorium, Rundu, Kavango East Region
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). Dr. Mwiya then introduced ReconAfrica's Environmental Social and Governance (ESG) Director Ms. Claire Preece as a guest speaker. Other key participants introduced during the meeting included Mr. Shakwa Nyambe as the Energy, Natural Resources, Commercial and Dispute Resolution Consulting Lawyer. The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators. Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 in the Kavango Region. A key note address was offered by the Regional Governor of Kavango East Region, Hon. Bonifatius Wakudumo and was captured as below.

The "fear of the unknown can only be addressed by technical expertise with vast experience in the industry this is an acknowledgement to Dr Mwiya as a local and international consultant appointed to lead the EIA process required for ReconAfrica to implement the project accordingly. Hon. Wakudumo further emphasized that, it is important at an early stage of project development to inform and consult the public so that everyone feels a part of the process and the proposed activity to be undertaken. In the absence of consultation, the local community may feel left out as not being granted an opportunity to raise their concerns hence this opportunity allows for the public to raise their views and perhaps additional technical knowledge required will be identified during the process. Kavango East is one of the poorest regions in Namibia with high unemployment rate and teenage pregnancies. Teenange pregnancies can be related to economic development in an event that the youth have necessity that can't be meet by their lack of money and therefore become very vulnerable and in the process fall pregnant and infected with HIV. To address poverty, we need socio-economic development. The Namibian government is doing its best in addressing poverty through socio-economic development, making provision for access to water, electricity and physical infrastructures of education but hence we are saying this region is the poorest in the country. The government cannot address the aspect of poverty alone and equally the aspect of unemployment. We need private sectors and investors that can come in and build industries such as Oil and Gas, an industry that will create employment opportunities and change people's livelihoods. We need to develop this opportunity with the right technical skills and not compromise the environment and its ecosystem. Hon Wakudumo then thanked everyone for participating in the EIA process.

2. PRESENTATION

Dr Mwiya facilitated the meeting and provided an overall perspective of the EIA process for the proposed 2D Seismic Survey continued with a PowerPoint Presentation that covered the following topics:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

A Draft Environmental Scoping report was distributed to all attendees for reference and discussion where required. Prior to the meeting, electronic versions of the draft reports were also distributed via email correspondence.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below is a picture to the public consultation meeting.

Figure 1: Dr Mwiya during the presentation at the public consultation meeting in Rundu

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation and way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.

- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The public consultation meeting ended at 13:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	A question was raised on whether an EIA process was undertaken for the current stratigraphic well drilling operation, does the current EIA process include both the ongoing drilling operation and proposed 2D seismic survey? A response was given such that a petroleum exploration programme is implemented into 5 different phases, phase 2 to 5 requires a separate EIA process for each phase. ReconAfrica is currently on phase 2 of the project implementation that pertains to the collection of key data sets including the geology, aerial gravity, magnetics and stratigraphic well drilling. An EIA was already undertaken for the ongoing Stratigraphic well drilling operation required to confirm the sedimentary basin and MEFT approved the project in 2020 by issuing an Environmental Clearance Certificate that is still valid. The next step (Step 3) in the process is to undertake a 2D seismic survey to understand the extent of the sedimentary basin, to search for potential geographical structures/ reservoirs within this basin that may hold feasible commercial oil or gas. The EIA process is currently for the 2D Seismic Survey.
2.	A comment was raised such that, the period of 1 month proposed to undertake the 2D seismic survey operation is quite very short in relation to the 450km distance of survey lines to be covered. In addition to this, another comment was raised relating to the flora studies proposed to be undertaken within a similar timeframe of a month such that this is not adequate time required to undertake a detailed flora study covering a distance of 450 km. A response was given such that a scope of work is given to a biodiversity specialist. The specialists then decides “depending on the magnitude of the project and its location” what the terms of reference for undertaking a biodiversity study and associated timelines for completing the studies. A detailed flora survey study for the proposed 2D seismic survey lines in already disturbed and existing gravel access roads is irrelevant as there is no flora in the access roads used on daily basis by local commuters. A detailed flora survey would only be required if new cut lines are proposed through undisturbed areas such as community forests. However, ReconAfrica is undertaking a biodiversity specialist study to understand the type of flora and fauna that exists in the surrounding areas. This is required for planning purposes of the seismic survey. The Seismic survey operation will be mobilized by an international company. Various steps will be followed prior to the actual seismic survey activity “Data Acquisitions” that could be completed in a month.
3.	Why is ReconAfrica not discussing plans and methods to be implemented during production of oil and gas shall the existing operation result in positive findings. A response was given as follows: It is quite misleading to potential investors to confidently state Oil and Gas exists and already define the method of production as at this stage all that is being undertaken is data collection to confirm the existence of the sedimentary basin and geological structures that could hold potential feasible hydrocarbon for possible commercial production. There is no oil discovered at this stage, we are collecting data as part of the Stratigraphic Well drilling and 2D Seismic survey.

No.	Questions / Comment / Issue raised
4.	Are you aware that the owners of the land at Mbambi area proposed for the second stratigraphic well drilling operation were not adequately consulted and letter pledging answers to how this land was acquired has been circulating from different offices. A response was given such that, the land issue is being discussed with the Traditional Authority in the area and is not part of the Seismic Survey project.
5.	Does a business proposal/ plan exist for this operation, this is always a requirement in communal lands that a business plan is compiled for any proposed business? A response was given such that, in mineral resources industry the business plan provided to the regulators is an Explorations Plan. The Exploration Plan details the methodology and approach for the project implementation. This plan is also included on the first page in the Draft scoping report's project background. However, detail about the projects costs are underpinned in the petroleum agreement. The petroleum agreement is a confidential document. A generalized standard petroleum agreement is available on the Ministry of Mines and Energy (MME) online portal and is termed as Model Petroleum Agreement (MPA). It details all the requirements, percentages in share agreements etc. The standardised document is given to the Petroleum Exploration Applicant by the MME specifying the terms of agreement to be entered into with the Namibian government.
6.	Why is the petroleum agreement with the Namibian government secretly held and avoided from the public as people in the Kavango Region are unaware on what the terms and conditions raised in the agreement? Refer to above point 5, discussion on MPA.
7.	How will the local community especially Kawe and Mbambi benefit from the project apart from job creation opportunities? A response was given as follows: • The petroleum industry is highly regulated when it comes to local benefits relating to employment creation and use of contractors "service providers". An MPA is signed between the applicant "Recon Africa" and the Namibian government represented by the MME. • Provisions regarding preference to local recruitment of highly technical skills and service providers are part of the MPA. • Training provisions is also clearly stated in the MPA. • The petroleum act has separate regulations developed to supplement the income tax and Value Added Tax. Shall oil and gas be discovered, 5% royalties and 35% corporate tax agreements will be entered into. • License annual fees are charged per degree square block, mandatory annual contributions of up to 1.2 Millan NAD is also contributed toward the Petroleum Training and Education Fund (PetroFund). Noncompliance to these requirements and conditions would lead to sanctions that can lead to penalties and or revoking the MPA.

No.	Questions / Comment / Issue raised
8.	A question was raised such that, the Traditional Authorities are the custodian of communal land, what are the benefits this project will bring forward to the authority? Relevant to the Exploration and drilling programme, clauses to the benefits between the government and Petroleum Exploration Applicant are detailed in the Model Petroleum Agreement. Conditions relating to procurement of services and technical skills are clearly stated in the MPA.
9.	A point of clarity was requested in terms of the extent of the proposed survey lines covering an area of 450 km. A response to the above was given as follows: • The survey lines are measured in distance from one point to the next i.e. East to West and North to South direction, the totality in distance of all survey lines amounts to 450km. • The Survey line Map illustrated during the presentation details the extent of the survey lines at different locations.
10.	A point of clarity was raised regarding the existence of the Kavango basin as it seems that, the basin is known and therefore oil and gas production operations will be undertaken later on. A response was given such that, the Sedimentary Kavango Basin is not known. The ongoing site specific stratigraphic well drilling operation is intended to confirm the existence of such sedimentary basin. The proposed ground geophysical 2D seismic survey will be undertaken to search for potential geographical structures that could hold feasible/ economic oil and gas reservoirs.
11.	A comment was raised such that, regular maintenance of the access gravel roads proposed for the 2D Seismic Surveys and used for transportation purposes to the stratigraphic wells at Kawe and future proposed Well at Mbambi is necessary.
12.	A comment was raised such that ReconAfrica should look into other potential alternatives that could benefit the communities and could empower women in these areas.

APPENDIX 2: Attendance Register

A.M

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
41	A. Haingura	Governor's Office	0212413295	andrew.haingura@gmail.com	
42	M. Kampota	Councillor-Ndonga	0814108092	mskampota@kavangoeastgov.na	
43	Hon B. Wakudumo	Govenor			
44	MR SAM Nekaro	CEO			
45	Hon. G. Kanyungu	MAYOR			
46	Ho. P. Mbangu	R. Councilor			
47	Nkanga K.K.	Shambyu T.A.	0814206688		
48	Mukoya L.	Ndiyona Councilor	0817109920	laurentius.mukoya@	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
33	FAUSTINUS INAWAMA	NCCI	0812008873	tinuwalwadnng@gmail.com	
34	SHINKUMI, Heinrich WENZEL	FARMER	0812789900	ndinovesti@gmail.com	
35	LUCAS R. Kasera	Mashara FARMERS ASS.	0812800299	uncleluke75@yahoo.com	
36	W Mbe	SINIMBU	0818593386	W.Smu@gmail.com	
37	S.H. Kantema	Chiefs Council	0811244390	sebastian.kantema@gmail.com	
38	A 3131	NNF	0814244574	ajiji@nnf.org.na	
39	Max Muyembanda	KE&WRCCFA	081 2885 354	mmuyembanda@gmail.com	
40	ADOLF MUREMI	KERFU	0812576671	adoltina98@yahoo	

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ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
25	Claire Luca	ReconAfrica		claire.luca@reconafrica	
26	HANINLYZM		081449883	kadinHanin@gmail.com	
27	Rev M DaRoslan	farmer	0813188862	[illegible]	
28	Paulus Shiwunge	FARMER	0811487924	bepsy@lavoy.na	
29	Petrus Murongo	NAMPA	081358565	petrus@nampa.org	
30	B. Diaz Namadina	Rosh pinah	0814380122		
31	Eliz. Jilkuma	MEFT	0812751088	jilkumaerwin@gmail.com	
32	Selma Angolo	MEFT	0811431988	—	

A.M

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
17	Robert Mwanachilenge	Petrofund	+264 811240552	Robert@metprosol.com	
18	ALEX WARNE	PIONEER	0811286063	alexwarne1@gmail	
19	Yuri Prez	ReconAfrica	0811479809	yuri.prez@reconafrica.com	
20	F. Thikerete	KERC	0812891758	fthikerete@kavangoeast.gov.na	
21	P. K Haimbili	KERC	0812386730	phaimbili@kavangoeast.gov.na	
22	M. MANGUNDU	KERC	0814541057	mmangundu@gmail.com	
23	Haironga Japhet	farming	0814027646		
24	Mahongo John	farming	0817505709		

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ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
9	SHITJAVA C.M	IUM/ECN	0813507121	smashikaeyahoo.com	
10	Emilia E.N	RCHQ	081 3821085	endohafa@gmail	
11	ARNO	Aqua Drilling	0811275131	arno@aquadrilling	
12	Victoria Kauma	Regional Council	0811563979		Kauma
13	Fillipus MAUHAN	KERC	0811572280		
14	TINO Haingura	f. Shakumbu	0811720472	haingura	
15	I Veijo		081 423 0797	iveijo@yahoo.com	
16	Ignatius	Rent a Drum	0813721313	Rundurentadrum@gmail.com	

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ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
1	Hebuu Sikenzo DAMIAN	MAWLR	08123 27084	oksmcoffice@gmail.com	
2	MAGHAMBAYI	KERC	0812379017	maghambayi@gmail.com	
3	Ilen Indangu	Ombudsman	0811470074	indangu@ombudsman.org.na	
4	Ova Amuthem	Ombudsman	0811601172	oamuthem@ombudsman.org.na	
5	KOBUS	J.R. WELDING	0812050683	kobusinak@yahoo.com	
6	HC MAHNKE	L.A.C.	0855630949	hcmahnke@lac.org.na	
7	P. WATSON	LAC	0812336862	pwatson@lac.org.na	
8	KROBLER	MEDIA	0812401587	johnykrobler@icloud.com	

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AM

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
49	FUDGE A	SAMSITH.	0811293290	KAVHARM@iAFRICA.com.na.	
50	Clemence K.	CLOSDEC	0811472458	cmphukurenu.cosdec.org.na	

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF PUBLIC CONSULTATION MEETING (AFTERNOON SESSION)

Kavango East Region, Rundu, AMTA

MEETING DETAILS	
DATE	22 January 2021
TIME:	15:00- 18:00
VENUE:	AMTA Auditorium, Rundu, Kavango East Region
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). Dr. Mwiya then introduced ReconAfrica's Environmental Social and Governance (ESG) Director Ms. Claire Preece as a guest speaker. Other key participants introduced during the meeting included Mr. Shakwa Nyambe as the Energy, Natural Resources, Commercial and Dispute Resolution Consulting Lawyer. The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators. Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 in the Kavango Region.

2. PRESENTATION

Dr Mwiya facilitated the meeting and provided an overall perspective of the EIA process for the proposed 2D Seismic Survey continued with a PowerPoint Presentation that covered the following topics:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

A Draft Environmental Scoping report was distributed to all attendees for reference and discussion where required. Prior to the meeting, electronic versions of the draft reports were also distributed via email correspondence.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below is a picture to the public consultation meeting.

Figure 1: The Afternoon Public Consultation meeting in Rundu

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation and way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The public consultation meeting ended at 18:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	A question was raised such that, after the data acquisition process of the stratigraphic well drilling and 2D seismic survey present positive findings, who is the proponent that will be appointed to undertake the production phase of the Oil and Gas. Will this data be sold off to a different entity? A response was given such that, the focus at this stage is the proposed stratigraphic well drilling and 2D seismic survey. ReconAfrica and the Namibian government have entered into a petroleum agreement for these activities. Shall the exploration activities prove positive finding, a totally different process will be implemented based on the petroleum agreement requirements.
2.	(NOT RELEVANT TO SEISMIC SURVEY) A comment was raised as follows: The land at Mbambi currently being used for construction activities for the 2nd stratigraphic well drilling is an ancestral land belonging to our grandparents the Kalenga Family. The family was not consulted regarding this operation. We have drafted a letter and sent email and yet no response has been given A response was given as follows: ReconAfrica have just received the stated letter recently “less than 3 days ago”. The acquisition of land for the existing activities was through the Traditional Authority. It’s through this communication channel the issue can be discussed and will be addressed. The Traditional Authority will engage with all the affected party and decisions will be taken accordingly.
3.	Shall a resident of Rundu urban community acquire a job from the seismic operations, will accommodation be provided in the remote areas? A response was given such that, accommodation will be provided and dependent on what type of activity needs to be implemented. A temporary survey camp will be developed through appropriate consultation with the Traditional Authority and the headmen. There are various conditions that will be implemented to ensure this is done appropriately.
4.	(NOT RELEVANT TO SEISMIC SURVEY) A question was raised such that, is there an explanation for not consulting the local community prior to the ongoing stratigraphic drilling operations in order to gather their consent?

No.	Questions / Comment / Issue raised
5.	How many local people do you intend to employ from Cuma for the seismic operation? A response was given as follows: This will depend on the type of job skills required for the specific task. The Traditional Authority will also be involved in the process.
6.	A point of clarity was raised regarding the existence of the Kavango basin as it seems that, the basin is known and therefore oil and gas production operations will be undertaken later on. A response was given such that, the Sedimentary Kavango Basin is not known. The ongoing site specific stratigraphic well drilling operation is intended to confirm the existence of such sedimentary basin. The proposed ground geophysical 2D seismic survey will be undertaken to search for potential geographical structures that could hold feasible/ economic oil and gas reservoirs.
7.	A comment was raised such that, regular maintenance of the access gravel roads proposed for the 2D Seismic Surveys and used for transportation purposes to the stratigraphic wells at Kawe and future proposed Well at Mbambi is necessary.
8.	A comment was raised such that ReconAfrica should look into other potential alternatives that could benefit the communities and could empower women in these areas.

APPENDIX 2: Attendance Register

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
1	MANIKAREINO	NAMPOL	0816228848	reinholdmanikaregmail.com	
2	nseu Leopoldine	Councellor	0816375481	nseupemba@gmail.com	
3	EKANDJO EMILY	NAMPOL	0813821085	Ekandjondah@gmail.com	
4	MPAREKE RANDOLPH	Beyond Tech	0857182031	mparekerandolph@gmail.com	
5	ULRICH BERNIDENHEUDT	CYD	0816294451	ulrichevan@gmail.com	
6	Sepele Ann	Shambyu TA	0812272482	P.O.BOX 1584	
7	ANDREAS K.	MBAMBI	0812326189	andreaskawana@y	
8	Kalenga	Mbambi	0813297642	Po Box 2109	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
9	P. Kufuna	MBAMBI	0812304690		
10	Kakenge J.	Mbambi	0816430934	tsosimon9@gmail	
11	Simon S.	Mbambi	0811537755		
12	Kamagu Nthala	Sunset	0818210557	N/A	
13	Ikembu chrisin	Sunset	0813676767	N/A	
14	Apeta daniel	Sunset	0812113165	N/A	
15	Kauyt	Sunset	0813994461	N/A	
16	Zonas	Kehemu	0817203228	N/A	

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	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
17	Kabunga	Suncity	0818076411	—	
18	Mubuka	Sauyemwa	—	—	—
19	Kativa	SunCity	0813440146	—	
20	Himarwa	SunCity	0816103788	—	
21	Tikus	Sauyemwa	0812976992		
22	Kandjimi M	Sauyemwa	0816556658	—	
23	Sinkumba Frans	Vhunga Vhunga	0815963166	—	
24	Siweka Jeremia	Suncity, Rundu	0817582437	jsiweka@gmail.com	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
25	Pesa Andreas K	Sun City	0818457771	—	
26	Kandete Moses K	Sun City	0814126752		
27	Nyumba Alfinus	SNAfari Rundu	0816727449	—	Nyumba
28	Hom NDUMBA	City	0816828097		
29	Elizabeth	Sikanduko	0812000289		EN mcefers
30	Katemo Joseph	Sun City	0817386124		
31	Kambangi Thomas	Sun City	0813003253		
32	Kufuna C	Sikanduko	0818466842		

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
33	Walker Emma	Hamweyi	0817532333	—	
34	Amunyela Angeline	NCUMUSI	0813427027	—	
35	Podensiana Tamtswe Naito	NCUMUSI	0815923209	—	Tamtswe
36	Paulus Mushungo	Hamweyi	081353178	—	
37	B. Kudumu	Kehemu	0814182413	—	
38	Kaiki	Lethu	0812749407	—	
39	Nelitu Zydia	Sauyemwa	0817530716	—	
40	Ihemba	EITA	0817860536	—	

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
41	Jambaru Lynda	Sauyemwa	0816813229		
42	Kafene Lorensa	Sauyemwa	0814589258		
43	Hilen	Suncity	0816442335		
44	Mareangwa K.M	Sun City	0813947599		
45	Mushangora H.M	Ndama	0816601021		
46	Thomas	Leonard	081554820		
47	Tangeni	Ndeyaya	0814593593		
48	Mululu	Aquin	0814487632		

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

	NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
49	Fillemon Johnno	Sikanduko	081 270 1108		
50	Kavila Saurag	Sikanduko	0814440585		
51	Mbambi Petrus	Sun City	0812807820	petrumbambi[illegible]	
52	Frans M	NDAMA	0818735604	francommy[illegible]	
53	[illegible]	Kehenzu	081 3180972	[illegible]	
54	ALEX	K.	0813234420		

ATTENDANCE LIST FOR PUBLIC AND STAKEHOLDERS MEETING IN RUNDU, KAVANGO EAST REGION FOR THE PROPOSED PETROLEUM EXPLORATION (2D SEISMIC SURVEY OPERATIONS) IN PEL NO. 73 (22 JAN 2021)

NAME	ORGANIZATION	CONTACT NUMBER	EMAIL ADDRESS	SIGNATURE
JIKERWA ANDREAS	FARMER	0812566915	andreasjikerwa@gmail.com	
IGLECIAS MARUTA	FARMER	0814885865	marutaiglecias@gmail.com	
Rukude Ruko				

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango West Region, Siivaradi, Ncamagoro Constituency

MEETING DETAILS	
DATE	23 January 2021
TIME:	10:00 -13:00
VENUE:	Siivaradi, **under a community Tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

The community meeting was facilitated by the Councillor Hon. Johannes K. Sikondo of Ncamagoro constituency through the Traditional Authority. Hon Sikondo gave a key note address emphasising that Dr Sindila Mwiya a local and international independent consultant representing and appointed by ReconAfrica's purpose for his visit is to enlighten the community on the proposed project activities associated with the 2D Seismic Survey and most importantly highlight any possible impacts if any that could result from such a project. The councillor further indicated that, shall there be any clarity required regarding any public information reiterated earlier by different media channels and related to the proposed seismic Survey, this would be the opportunity to raise such concerns as the correct information would be shared.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English to Rukwangali was provided by Mr. Izaac Veijo. Mr Veijo has been involved on a 2D Seismic Survey project previously undertaken in the Kavango Region. His wealth of experience added more value to the translation and demonstration of how seismic survey activities are undertaken and whether there were any impacts associated with such an activity based on his opinion and experience in the Kavango Region. Mr Sanzila that understands the language could track the translation accordingly. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below is pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Shivaradi

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The public consultation meeting ended at 13:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	A question was raised as follows, what is the approximate distance from the existing site of the stratigraphic Well drilling operation at Kawe to Sivaradi and how does the community of Sivaradi relate to that project? A response was given such that, Kawe is about ± 60 km. The proposed 2D seismic survey line EW5 will be undertaken on an existing access road cutting through this community. This meeting is about the proposed 2D seismic survey line. All ReconAfrica activities concerns the Kavango East and West Regions, communities such Sivaradi are immediate within the immediate area of influence specific to the seismic survey.
2.	A question was raised such that shall the proposed 2D Seismic Survey and more stratigraphic drilling operations result in feasible economic oil and gas discovery in both Kavango West and East Region, is ReconAfrica going to choose one specific area for production, or is the production going to be logged in both regions? A response was given such that, wherever the discovery is feasible, is where the production will be undertaken. However, as the both Governors of Kavango West and East Regions stated, the project in its entirety will benefit both regions in terms of socio-economic development.
3.	The community acknowledged the good illustrative presentation. However, would not have many questions to raise at this stage as most of the false information doing the rounds in the public is totally different from what has been presented. Perhaps once the seismic survey has been completed and positive findings have been presented, then we will have more questions to raise. The community further acknowledged the presence of the Councilor and Headmen as they would have not had much interest in attending the meeting.
4.	The headmen emphasized that, she expects the community to raise questions related to how Sivaradi community could directly benefit from the proposed 2D Seismic survey and shall the discovery of oil be feasible for production how will this still benefit Sivaradi community?
5.	We understand ReconAfrica has invested a lot of money in the Oil and Gas Exploration programme, suppose nothing is found, do they park their equipment, leave and claim their investment back from the Namibian government? A response was given such that, ReconAfrica will definitely cease the operation. However, the data gathered will still remain a national asset.
6.	A suggestion was raised such that, shall there be future public consultation or information sharing meetings, the meetings should be organized at Mburundi area as it serves as a central area to for people to commute from Sivaradi 1 and Sivaradi 2. A response was given as follows:

No.	Questions / Comment / Issue raised
	A lot of considerations was put in place to agreeing to a meeting at Sivaradi as being the community with the biggest population in the area. In addition to this, the seismic survey activities would use the existing access road through the community forest that is closest to this community and therefore the council agreed to have this meeting in this community.

APPENDIX 2: Attendance Register

ATTENDANCE LIST IN Sivaradi..... (VILLAGE)
23 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Haindaka Alune	Mburundu	0812451013	23/01-2021
2. Lucas Anna	Sivaradi No.1	—	23/01-2021
3. Namukwaka pauline	Sivaradi No.1	—	23/01-2021
4. Siuhute Viola	Mburundu	0818837496	23-01-2021
5. Theresia - Nekaro	Sivaradi No.2		23-01-2021
6. Murere - magdalena	Sivaradi No2		23-01-2021
7. Muronga Magdalena	Sivaradi No: 1	0812311746	23-01-2021
8. Reino Verna	Sivaradi No: 1		23-01-2021
9. Shiwo Anna	Sivaradi No.1		23-01-2021
10. Isak Veijo	Sivaradi	0814230797	23-01-2021
11. SIFIRE VEIKKO	mburundu	0816011220	23-10-2021

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ATTENDANCE LIST IN ...SIVARADI..... (VILLAGE)

23 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. ISAKAR MULIKE	Sivaradi	0812495724	23/01/2021
2. Hashoshili Shifidi	Sivaradi	N/B	23/01/2021
3. MUROMGA PATRICK	SIKONGO	0815632624	23/01/2021
4. TOMAS	PETRUS	N/A	23/01/2021
5. MARTHIN SIHOVA	HAMWERE	4720161	23/01/2021
6. RUDENDO NDARA	JOHN	0813801907	23/01/2021
7. RUFUS SIPUHBU	Sivaradi I	0814434636	23/01/2021
8. WALTER Semele	Sivaradi I	—	23/01/2021
9. Reino V. Nambase	Sivaradi I	081 3229 664	23/01/2021
10. Muronga Markus	Sivaradi I	0813303143	23/01/2021
11. PETRUS Mbambo	Sivaradi I	0811606569 8	23/01/2021

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ATTENDANCE LIST IN Sivaradi..... (VILLAGE)

23 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. SIKONDO JOHANNES K	Sivaradi 1	0811545417	23/01/2021
2. Munango Hilleni	Sivaradi (1)	0812954061	23/01/2021
3. SINDILA MKUYA	"	0811413229	23/01/2021
4. Fidelis Muyundo	"	0812719171	23/01/2021
5. MARVIN SANZILA	SIVARADI	0814788279	23/01/2021
6. Meriam Kouyoma	Sikondi	0818787555	23/01/2021
7. Mbambo Rebekka	Sivaradi No.1		23/01/2021
8. Emilia Kkandjo	Rundu	0813821085	23/01/20
9. Mbambo Victoria	Sivaradi. No.1	0815588467	23/01/2021
10. Nterere Elisabeth	Sivaradi. No.1		23/01/2021
11. Kuyano Joseph	Sivaradi No-1	0814308272	23/01/202

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ATTENDANCE LIST IN ...Sivaradi..... (VILLAGE)
23 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
Albertina Hamutenya	Sivaradi	0817090513	23/01/2021
1. Aterere Apollonius Kotti	Sivaradi	0815522877	23/01/2021
2. Regina Karumbwena	Sivaradi		23/01/2021
3. Mise Hamunyuwa	Sivaradi		23/01/2021
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ATTENDANCE LIST IN Sivaradi..... (VILLAGE)
23 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Hashoshiki Shifida	Sivaradi 1	0814343425	23-01-2021
2. Mangunda Gretchens	Sivaradi NO. 2.	0818061939	23-01-2021
3. Christine Links		0813036654	23-01/2021
4. MANIKA REINO	Sivaradi	0816228848	23.01.2021
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RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango West Region, Gcaru, Ncamagoro Constituency

MEETING DETAILS	
DATE	24 January 2021
TIME:	14:00 -17:00
VENUE:	Gcaru **under a community Tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English to Rukwangali local language was provided by Mr. Izaac Veijo. Mr Veijo has been involved on a 2D Seismic Survey project previously undertaken in the Kavango Region. His wealth of experience added more value to the translation and demonstration of how seismic survey activities are undertaken and whether there were any impacts associated with such an activity based on his opinion and experience in the Kavango Region. Mr Sanzila that understands the language could track the translation accordingly. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below is pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Gcaru

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The community meeting ended at 17:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	A question was raised such that when the seismic survey activities begin, is it only technically skilled people that will be employed to support the operation? A response was given as follows: Shall the seismic survey be undertaken both local technical and non-technical skilled labor will be employed. Training will also be provided where required. The traditional authority and the Councilors will be requested to assist with identifying people from the communities that could support the survey activities in the area.
2.	A question was raised such that, where exactly at Gcaru will the seismic survey and possible stratigraphic well drilling will be undertaken? A response was given as follows: • There is no fixed location for stratigraphic well drilling yet it is anticipated it will be in this area. When ReconAfrica has made the decision, the Traditional authority will be consulted to advise whether that specific area is available for the future stratigraphic Well drilling activities. • The 2D seismic survey activities will be undertaken in the access road just opposite this meeting representing the proposed EW5 survey line.
3.	In what form is oil and gas present in the sedimentary basin and how will this be extracted? Oil is in liquid form either in thin liquid where it flows easily or thick liquid. Gas is in its natural gas form. Oil is formed in the same way as in for example cooking porridge in a pot. You have the liquid form cooking, boiling and forming gas above. If the lid is covered on the pot, pressure would be created this is similar to the surface matter on the ground and subsurface creating pressure to as deep as for instance “4 km” below. The deeper it gets the higher the temperature rises. If you open a hole through the lid, that pressure will force the gas upwards and the oil. This is a similar process to drilling through the earth where petroleum structure is present however the process is done with extra caution to avoid accidental eruption of gas and oil.
4.	A comment was raised by an elderly as follows: “All these young men and women gathered here are looking for jobs. God that knows our suffering has sent us a Doctor “Dr. Mwiya” to enlighten us about this knowledge and opportunity so that our children will benefit through employment and be able to take care of their elders”

No.	Questions / Comment / Issue raised
5.	A comment We would like to urge for all communities including Traditional Authorities, the councilors to work together especially in understanding the recruitment process and how it will be implemented. This will avoid conflicts between the different communities.

APPENDIX 2: Attendance Register

ATTENDANCE LIST IN ...Garu..... (VILLAGE)
24 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Sindimba Konrad	Garu	081 6585477	
2. Simaho Klaus	Gawatjinga	081 7073355	
3. Siwombe Justinus	Garu	081 8349599	
4. Ngunda Matheus	Sikali	081 6248059	
5. Murango Paulus	Garu		
6. Mukoya Ignatius	Geigeo	081 6824639	
7. Kandjeke Joseph	Garu		
8. Abel Jonas	Gawatjinga	081 2774630	
9. Katua David	Geigeo	081 4751407	
10. Jacinto Paulus	Sapirama	081 4221734	
11. Nseu Leopoldine	Hamweni	081 6395484	

Makunga Johannes K.	Ncaute	081 4496973	
Litwali Pladius	Ncaute	081 4146582	
Mukoya Semete	Geigeo	081 3811398	

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ATTENDANCE LIST IN ...Gcaru..... (VILLAGE)
24 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Karapo Friska	Gcaru	081275 1261	24-01-2021
2. Sikindo Rosalia	Gcaru	0817651200	" "
3. Simaho Martha K.	Gcwatjinga	0813784058	" "
4. Musisi Mariane	Sapirama	0817156255	
5. Adriano Secilia	Sapirama	0814136782	
6. Mukoya Annastasia	Gcigco		
7. Haupindi Johanna	Gcaru		
8. Mukoya Fransiska	Gcigco	0818469056	
9. Kupembana Rossalia	Gcaru		
10. Yiseipa Agnes	Gcaru		
11. Siwarango Nepemba	Gcaru	0812305718	

Ntjinano	Fransinano	Gcaru	0813138245	
Maseka	Helvi	Gcigco	081 5917795	
Mukoya	Emilie	Gcigco	0818205101	

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN ..Gcaru..... (VILLAGE)
24 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Mukoso Cunibert	Gcaru		
2. Mukaya Thobias	Gcigco		
3. Roseke Denis	Gcaru	081 525 7802	
4. Mandume Eusebius	Gcaru	0818517695	
5. Haugiku Sikukuta	Gcaru	~~0817880 30~~	
6. Nyangana Athanasias	Gcaru	081 831 6311	
7. Mbanze Paulus	Gcaru	0818592425	
8. Kaseta Joseph	Gcaru	0812139964	
9. Cuma Moira	Gcaru		
10. Sikombero Johannes	Gcigco	081 244 4182	
11. Daniel Kawifer	Gcaru	~~08~~	

Munkanda Sebastian	Gcaru		
Hamutenya Engelbert	Gcaru	0818513407	
Sindimba Conard	Gcaru		

ReconAFRICA

Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN ..Gcaru..... (VILLAGE)
24 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Pauline Namwhura	Gcaru		
2. Kapeto Jovita	Gcaru	081	
3. Haingura Eufemia	Gcaru		
4. Haimbanga Beatha	Gcaru		
5. Mandume Rachel	Gcaru		
6. Siwombe Rosina	Gcaru		
7. Kasera Mariane	Gcaru		
8. Mahongo Mestilde	Gcwatjunga	0817231634	
9. Ncani Nasira	Gcaru		
10. Siwombe Eufemia	Gcaru		
11. Tame Secina	Gcigco		
Nuhembo Pauline	Gcaru		
Kangombe Johanna	Gcaru	0817872047	
Nsimano Marko	Gcigco	0816791642	

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN ..Gcaru..... (VILLAGE)
24 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Andreas Manungu	Gcaru	0817156142	
2. Mandume Markus	Gcama	0818056102	
3. Adehard Siwambe	Gcaru		
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RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango West Region, Ncuncuni, Ncuncuni Constituency

MEETING DETAILS	
DATE	25 January 2021
TIME:	10:00 -13:00
VENUE:	Ncuncuni **under a community tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
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- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below is pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Ncuncuni

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The community meeting ended at 17:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	A comment was raised as follows: We would like to thank you for a good presentation for detailing what the process ReconAfrica is undertaking at this stage. We wished that this information was available or presented earlier on as our communities have been misled whereby we identified the operation as an actual mining operation opposed to an Exploration drilling and proposed 2D Seismic Survey. However, we still wish for more clarity based on the jobs recruitment process as we are still misled with information such that one has to pay to be considered for work, please clarify on this. A response was given that, this is indeed misleading information. The recruitment process for the proposed 2D seismic operation will be handled through the Traditional Authority, councilors and headmen.
2.	A question was raised such that, shall the data finally be collected from the 2D seismic Survey and stratigraphic drilling operation, where will it be sent for analysis? A response was given as follows: That data collected will only be analyzed out of the country, perhaps in the USA.
3.	A point of clarity was requested as to how long will the operation take from the point of data collection resulted from the proposed 2D seismic survey and the existing stratigraphic Well drilling operation to the actual Oil and Gas Production? A response was given as follows: Since 2015, it took ReconAfrica about 4 years to come to conclusive as in what specific locations in Kavango West and East regions to set up the stratigraphic well drilling. The stratigraphic well drilling operation will take at least a year to complete. The proposed 2 D seismic Survey will begin later this year and last until the end of the year. It will take another year to analyze all this data collected, perhaps then it will be required to confirm feasible oil reserve by undertaking further exploration drilling operation. Shall the drilling activities present more positive results, ReconAfrica will take another 4 years before any actual production.
4.	A question was raised such that, will training be offered to especially non-skilled labor where relevant, as some of us have no work experience related to seismic survey activities? A response was given such that, Training will be offered for all labor activities. This is part of the Petroleum agreement between the client and the Namibian government.

No.	Questions / Comment / Issue raised
5.	There have been similar seismic survey operations undertaken in Kavango Region, do you have insight on what the results of that operation have been? A response was given such that, there is no information at this moment present about the findings.

APPENDIX 2: Attendance Register

ATTENDANCE LIST IN Ncuncuni..... (VILLAGE)
25 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Pauline Hamutenya	Ncuncuni	0818949799	25-01-21
2. Muronga Anastasia	Ncuncuni	0817014492	25-01-21
3. GLEIGOR ALBERT	Kaukui	0814043413	25-01-21
4. Kandjara Johanes	Kaukui	0814376025	25-01-21
5. Sikaccca Angelika	Ncuncuni	0813210821	25-01-21
6. Icudumo Chrysostomus	Gcundu	0813939924	25-01-21
7. Mandema Bartholomeus	Ncuncuni	NA	25-01-21
8. NCAMG DANIEL	Ncuncuni		
9. NCANI KAVETO	~~Kaveto~~ Ncuncuncuni		
10. Kavau Mandema	Ncuncuni		
11. NGunda MATHEUS	Sikaci	0818248059	25/01/21
Hamusira Markus	Hamwey	081323187	25/01/21
Hakusama Eino	Hamwey	0815838494	25/01/21
SALOMO.R. JONAS	NCUNINGUNI	081 646 1997	25/1/2021

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ATTENDANCE LIST IN Ncuncuni..... (VILLAGE)

25 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Ndumba Johannes	NCUNCUNI	0818204922	25/01/2021
2. Meek Roger Kamba	Ncuncuni	0815948994	25/01/2021
3. Liparu Sipopa	Ncuncuni	N/A	25/01/2021
4. Kudumo Elina	NCUNCUNI	N/A	25/01/2021
5. Murongo Christine	Ncuncuni	0816981023	25/011/2021
6. Shindimba Adelheid	Ncuncuni	N/A	25/01/2021
7. Murongo Justina	NCUNCUNI	N/A	25/01-2021
8. Saimi kufuna	ncuncuni	0817309515	25/01-2021
9. Naintapo Kiothilde	Ncuncuni	N/A	25/01/2021
10. Nyumbu Michael	NCUNCUNI	N/A	25/01/21
11. Hausiku Napenlo	Ncundu	0814125022	25/01/21

Sabbi Dionisius	Ncuncuni	0818588843	25/01/21
MUPANGWA RICHARD	NCUNCUNI	0814540991	25/01/21
Shumbumbutu Maria	Kauti	0812878087	25/01/21

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Risk-Based Solutions (RBS) CC
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ATTENDANCE LIST IN ..Ncuncuni..... (VILLAGE)
25 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Kambinda Alloys	Kaisosi	0814823477	25/01/2021
2. Kapuleni . M	Kauti	0814421647	25-01/2021
3. Musumpuka G	Kauti	0813867327	25-01/2021
4. Nyangana B.	Ncuncuni	0814145892	25-01/2021
5. Kandjimi . L	Matundungu	0812669767	25-01-2021
6. Kahausiku . A.	Matundungu		
7. Kandjimi . T	Ncundu		
8. Siranda Michael H	Shinguruve	0816244655	25-01-2021
9. Ndjamba Manjor	Kauti	0813399962	25-01-2021
10. Hausiku Bernadine	Kauti	0813516446	25-01-2021
11. Sitareni Asser	Sharukwe	0817117816	25-01-2021

Kampanza Silas	Kauti	0813014469	25-01-2021
Ndara Michael	Shinguruve	0813381900	25-01-2021
Likuwa Annastasia	Kauti	0813394312	25-01-2021

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN ..Ncuncuni..... (VILLAGE)
25 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. KUFUNA MARTHA	NCUNCUNI	0813144179	25-01-2021
2. MURONGIA CECILIA	NCUNCUNI	0817766644	25-01-2021
3. MURONGIA SELESTINUS	NCUNCUNI	0816579994	25-01-2021
4. HAINGURA B.	NCUNCUNI	0812381238	25-01-2021
5. SITARARA FELIX	NCUNCUNI		25-01-2021
6. Kampandja Gisela	Ncuncuni	0812117110	25-01-2021
7. poulus simutwara	Ncuncuni	0813843869	25-01-2021
8. mbangu Hellena	Ncuncuni		25-01-2021
9. Mughongora Hermine	Ncuncuni	—	25.01.2021
10. Hausiku Benonia	ncuncuni	—	25-01-2021
11. Shirunda Jonas	Kauti	0817882121	25-01-21

Kalembo Petrus M	Ncuncuni	0813070842	25/01/2021
Kativa Maria	Ncuncuni	—	25/01/21
Sikaredo Kidian	Ncundu	0818201695	25/01/21

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN Ncuncuni..... (VILLAGE)
25 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Murora Benediktus	Shikali	0818215483	25/01/2021
2. Murora Martha	Shikali	0817455052	25/01/2021
3. Kambinda Immanuel	Shinguruve	0813302572	25/01/2021
4. Segyara Elizabeth	Kauti	0818139547	25/01/2021
5. Leti Siyakomba	Kauti	0	25/01/2021
6. Paulus Mukure	Ncuncuni		25/01/2021
7. Shiranda Markus	Kauti	0812057188	25/01/2021
8. Mwinda Petrus	Hamweyi	0814516777	25/01/2021
9. Kandjimi Bathame	Ncuncuni	0812203422	25/01/2021
10. Fransiskus Kemba	Ncuncuni	0818469056	25/01/2021
11. Kudumo Magnus	Ncuncuni	0814246691	25/01/2021
12. Muthongora Basilius	Ncuncuni	0813258605	25/01/2021
13. Adelheid Kudumo	Ncuncuni	0812222252	25/01/21
Linuwa Benoida	Ncuncuni	0817994249	25/01/2

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN Ncuncuni..... (VILLAGE)
25 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Kampanza Athanasius H	Ncuncuni	0816447113	25-01-21
2. Nyumbu Michael	NCUNCUNI	N/A	25-01-12
3. Sinaimba Jonas	NCUNCUNI	0814764138	25-01-21
4. Mangunda Bonface	Hamweyi	081 4687905	25-10-21
5.			
6.			
7.			
8.			
9.			
10.			
11.			

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango East Region, Ncaute Community, Ncaute Area

MEETING DETAILS	
DATE	26 January 2021
TIME:	10:00 -13:00
VENUE:	Ncaute, under **a community Tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

The community meeting was facilitated by the Headman Mr. Alois Gende that thanked everyone for making the effort to attend the meeting. Mr Gende further elaborated that, the meeting presents an opportunity to learn about the proposed 2D Seismic Survey activities and perhaps where there is clarity needed or concerns, this would be the platform to address them.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English to Rukwangali language was volunteered by the Headmen Mr. Gende. Mr. Gende provided detailed information in the translation. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below are pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Ncaute.

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The community meeting ended at 13:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	A comment was raised as follows There has been earlier information communicated through newspapers relating to employment such that one would have to register their names for possible employment, there is still a lot of confusion in terms of what is the right channel to send resumes/ CVs. The earlier information required the public to register through submission of CVs online, by post and or at AMTA offices in Rundu. We are not sure whether such employment request has to do with ReconAfrica directly for the Stratigraphic well drilling operations or the contractor Cowboys. In this regard, is the contractor Cowboys related with the actual well drilling operation? The headmen responded to this query as follows: The company cowboys are not appointed to undertake stratigraphic Well drilling activities. They are subcontracted to provide containers and catering services for the team working at the drill site. If cowboys advertised, it must have been for such related activities.
2.	Based on the presentation offered, it is very clear how the 2D Seismic activities will be undertaken and how the short-term recruitment process in each area where the seismic activities will be undertaken through the Traditional Authority and headmen. We do understand there is limited employment at this stage however shall the data collection process result in positive findings a totally different process will be implemented and perhaps assuming the production stage of Oil and Gas is regarded feasible, them more employment opportunities will be available.
3.	During the presentation, the headmen pointed out that certain journalists have visited communities ahead of the community consultation meetings without the consent of the Headmen and or Traditional Authorities.

APPENDIX 2: Attendance Register

ATTENDANCE LIST IN Ncaute..... (VILLAGE)
26 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Kamwanga Ambrosius M	Ncaute	0814341478	26-01-2021
2. Mwambo Ebinezer	Mubenga	0812722179	26/01/20
3. Kamburu Theresia	Ncaute	0813346733	26/01/2021
4. Hamushira Eugenia	Ncaute	0813410180	26/01/202
5. Marungu David	Ncaute	0813088187	26/01
6. Nangolo Meinhard	Ncaute	0818369951	26/01/2021
7. Mukunga Joseph	Ncaute	0818684623	26/01/2021
8. Kupembona Amandas	Kawe	0814488551	26/01/20
9. Mukunga Johannes K.	Ncaute	0814496973	26/01/20
10.			
11.			

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN .Ncaute..... (VILLAGE)
26 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. IUTANUKE ANNA	NCAUTE	0817741122	26.01.2021
2. KUDUMU MESTILDE	RUZAZA	0818920400	26/01/2021
3. Matheus Sindimba	Ncaute	0818016099	26/01/2021
4. MOYO MATIAS	NCUMEZAU	0812355 0292	26/01/2021
5. Kanyetu Magdalena	Ncaute	0816760315	26/01/2021
6. Annastasia Kasekere	Ncaute	0813316550	26/01/2021
7. Kupembona Aloisia	Ncaute	0814843804	26/01/2021
8. Haingura Andreas	NCaute	0814253858	26/01/2021
9. KANYETU AMATUS . S	NCAUTE	081699955 6	26/01/2021
10. Godhard Licius	Ncaute	0813570940	26/01/2021
11. Kamburu frankilde	Ncaute	0817513455	26/01/2021

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Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN Ncaute..... (VILLAGE)
26 JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. SHINDIMBA H.	NCAUTE	N/A	26/01/21
2. ANDREW H.	NCAUTE	0811477273	26/01/21
3. HAMUNYERA E.	NCAUTE	N/A	26/01/21
4. Manaund T	NCAUTE	8805700	26/01
5. Kasera J K	NCAUTE	72110200472	26.01.2021
6. Ndango. T	NCAUTE	0817375796	26/01/20
7. RWANGORO Paulinus	NCaute	0817137141	26/01/2021
8. Hamusira petrus K	NCaute	081 8374805	26/01/2021
9. Alois Gende	Mohungu-mohungu	0815290678	" "
10. Petrus Kufere	Ncaute	0812957126	26/01/2021
11. Muronga Paulus	Ncaute	0815965980	26/01/2021

Sindimba Kandjimi Andreas	NCaute	0818450059	26-01-2021
Ntambanga Gregor	Ncaute	0818054442	26-01-2021
Ntambanga Tobias		0818038265	26-01-2021

Kapiji	0818038873	PC No 01	EA OA
Kudjo Kawa	Ncaute	08	26-01-2021
Hausiku Thimotheus	Ncaute	0815596167	26-01-2021

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango East Region, Makandina Community, Kawe Area

MEETING DETAILS	
DATE	27 January 2021
TIME:	14:00 -17:00
VENUE:	Makandina, **under a community Tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

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COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English to Romanyo local language also known as Gciriku language was volunteered by Mr. Hausiku Hubert Sindimba, a resident of Makandina Village. Mr Sindimba is fluent in Romanyo and presented so much confidence and professionalism in his translations and illustrations. Mr Hubert would also assist with translation in other meetings in the Kavango East Region. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below are pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Makandina.

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The community meeting ended at 17:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	Prior to the existing stratigraphic well drilling operation. There were jobs promised to the community by the various contracting companies working on site presently and so far, there has not been any communication around the recruitment of people from the community for possible employment could you please clarify how this process has been implemented? A response was given such that, sometimes a subcontracted It depends which contractor promised communities for jobs. ReconAfrica have appointed a main contractor that is a highly specialized technical skills service. The main contractor has also appointed subcontractors. The subcontractors must ensure community involvement in delivery of their services. Perhaps at the stage they communicated information. There are certain jobs that do not require specialized skills perhaps instead of advertising nationally for these and creating the perception it's a big operation needing a large number of people they should have involved the traditional authorities and headmen from the community. For the seismic survey the approach is different and will involve traditional authorities for short term recruitment in each community where the survey will be undertaken.
2.	(NOT RELEVANT TO SEISMIC) We the community of Makandina are curious about what activities are being undertaken on the project site that is not far away from this area. Pubic access to the area is restricted, structures including the drill rig is already set up, how will we know exactly what's being undertaken in our neighborhood if access is restricted? A response was given as follows: The stratigraphic well drilling site is not for public access due to security and safety protocols that needs to be adhered to in order to avoid any injury to any member of the public including the team working on the rig. We can't even get access to the site without communication and an approval from the management. There is safety and security protocol that is undertaken before we even enter the site. The current team on site also have restrictions to certain areas on site that is not within their terms of services.
3.	There is a lot of negative information circulating around communities concerning the entire project in terms of it destroying the immediate environment. What is the motive behind these negative claims if the project entirely will bring much development to the community? A response was given as follows: The false information circulating about this project has no relation to the locality, neither the detail of the proposed exploration activities of the project. It would be easier to respond if the claim is related to what is being undertaken now at the well drilling location in Kawe and what is proposed as 2D seismic

No.	Questions / Comment / Issue raised
	Survey activities in existing gravel access roads infrastructure. From our understanding none of the information raised relates to what is proposed now.
4.	(NOT RELEVANT TO SEISMIC) There is more misleading information regarding the submission of resumes for work opportunity at AMTA (the designated office for Pioneers Energy and Minerals Consulting in Rundu) and the promises made possibly by the same contractor of job opportunities for our community. It seems we are all wasting our money since we don't have mailing/ post office infrastructure and making an effort to get transportation and travel to Rundu town for resume submissions. It seems preference will be for people in Rundu Urban while our community that is quite close to the drill rig will never have work opportunity. We would like clarity on who is responsible for such information. ReconAfrica have contracted a recruitment company to appoint people for different services and jobs not only in Kavango but as far as Walvis Bay and Windhoek. Perhaps the public may have not read quite well what's been requested in the adverts placed in the newspapers and created an impression that there is actually a lot of work opportunities being requested.
6.	A comment was raised such that, it seems for now the job opportunities for the immediate community is limited and perhaps only during the Oil and Gas production stage shall the project transpire to that. A response was given as follows: The Oil and Gas production phase brings its own myriad of job opportunities interrelated to the project. Training will also be offered for many job skills. The focus at this stage is data collection through stratigraphic well drilling and 2D Seismic survey.
	(NOT RELEVANT TO SEISMIC) We do know that shall there be a discovery of Oil and Gas, community consultation meetings such as this one will no longer be encouraged. ReconAfrica will not be seen in the communities. This is a common practice in other countries.
	NOT RELEVANT TO SEISMIC - Shall Oil and Gas be discovered in Kawe, what are the direct benefits to the community? A response was given such that: This community consultation meeting is about the proposed 2D Seismic Survey activities. We do not know there is feasible amount of Oil and Gas at this stage. Shall Oil and Gas be discovered, another community consultation process will be undertaken based on an Environmental Impact Assessment process. At this stage of Exploration activities, there is clauses in the Petroleum Agreement between Recon Africa and the Namibian government on

No.	Questions / Comment / Issue raised
	community development. The opportunity to raise such concerns will be given at that time.
	A comment was raised as follows: We have observed that some of the subcontractors have brought their own non-technical skilled labor including cleaners, catering services, laundry service providers and security services. We do have people locally capable of delivering such services. It still seems the communities around the project area will not benefit much from this project this applies to the current project activities being undertaken.

APPENDIX 2: Attendance Register

ATTENDANCE LIST IN Kawe..... (VILLAGE)

27 ~~28~~ JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Musongo Ezekiel	Makandina.	081 748 9902	
2. Sirongu Ernud	Makandina	081 29 51 514	
3. Timoteus k. Karembe	Makandina	N/A	
4. Siputi Gotrieb	Makandina	081 3252467	
5. Nyangana Johames	Ngana	081 4528439	
6. Liunda Vines	Mupapama	N/A	
7. Sindimba H. Sindimba	Makandina	081 362646	
8. Muronga Andreas	Makandina	N/A	
9. Munkanda Bathlomeus	Ngana	N/A	
10. Kantema Petrus	Makandina	081 2768232	
11. Sindimba Sikwaya	Makandina	081 8081829	

Kakomba Andreas	kawe	081 2124899	
H aiungu Silongu	Kawe	081 46 25889	
Makayi Immanuel	Kawe	081 237 4848	

ReconAFRICA

Risk-Based Solutions (RBS) CC
Delivering the Solutions

ATTENDANCE LIST IN Kawe..... (VILLAGE)

27 ~~28~~ JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Faustina Lishaka	Makandina	0816577123	
2. Fatima Matumbo	Kawe	0812721424	
3. Laureta Maria	Makandina	0817004177	
4. Kupembona Amondus	Kawe	0814488551	
5. Mahupe Paulus	Kawe	0814575868	
6. Andreas Kampali	Makandonina	N A	
7. Mukungwa Kangoraj	Ncaute	0812296973	
8. Danien Hausiku	Makandina	0812234826	
9. Petrus Kanganzi	Makandina	0817368218	
10. Martin Luther	Makandina	0817044710	
11. Nyambe Gabriel	Makandina	N/A	

Bonifatius Mbambi	Kawe	N/A	
Makayi Hilde	Kawe	0816943913	
Tutauke Martina	Kawe	0816406161	

ReconAFRICA

Risk-Based Solutions (RBS) CC

ATTENDANCE LIST IN Kawe..... (VILLAGE)

27 ~~28~~ JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Ndara Mathew	Makandina	081 8173549	
2. Asser Joseph	Makandina	081 4199326	
3. Hausiku Mathew	Makandina	~~08~~ N/A	
4. Sindumba Petrus	Makandina	081 3524983	
5. Hausiku E. Ndara	Makandina	081 8135419	
6. Muronga P. Muronga	Makadina	081 2751543	
7. Kudumo P. Sasova	Makandina	081 7474214	
8. Mbundu Petrus	Kawe	081 4780002	
9. Kavera Isala	Kawe	081 4277512	
10. Mahupe Pontianus	Makandina	081 5577691	
11. Ndumba Manfred	Makandina	N/A	

Moses Paulus	Makandina	N/A	
Sipeto Lukas	Makandina	081 3335387	
Mbangu Andreas	Makandina	081 7818995	

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Risk-Based Solutions (RBS) CC

ATTENDANCE LIST IN Kawe..... (VILLAGE)

27 ~~28~~ JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Moreki Lydia	Makandina	–	28/01/21
2. Sinano Susan	Makandina	–	28/01/21
3. Paulina Pantana	Makandina	–	28/01/21
4. Berlinda Gabriel	Makandina	0813295200	
5. Kaveto Maggreth	Makandina	0816815060	
6. Karola Ihemba	Mandina	N/n	
7. Kapumburu Innocentia	Makandina	0813424983	
8. Shimupuleni Scholastic	Makandina	0817860552	
9. Kampali Sophia	Mukandina	0813232372	
10. Sikwaya Pandelwiana	Makandina	N/A	
11. Sikwaya Maria	Makandina	N/A	

Mbimbi Lombo	Mutwegombahe	0817479554	
~~Vati~~ V.T Thikundeko	Kawe	0812889444	
Lukas Kandjimi	Kawe	0813668886	

ReconAFRICA

Risk-Based Solutions (RBS) CC

ATTENDANCE LIST IN Kawe..... (VILLAGE)

27 ~~28~~ JANUARY 2021

NAME	VILLAGE NAME	CELLPHONE NUMBER	DATE
1. Nandjira Dortea	Makandina	N/A	
2. Veronika Maruta	Makandina	081 5544852	
3. Annastacia Nangura	Makandina	N/A	
4. Losuitha Ruhepo	Makandina	0812176860	
5. Emegard Nankali	Makandina	081 32 117814	
6. Ottilie Namutenya	Makandina	081792163	
7. Muhembo Rembia	Makandina	N/A	
8. Renate Kunyande	Makandina	N/A	
9. Hausiku Emma	Makandina	0812241107	
10. Fransisca Ngonde	Makandina	N/A	
11. Portea Mate	Makandina	0814678789	

Likuwa Reginalds	Kawe	081 3299664	
Kakomba Elizabeth	Kawe	081 6050441	
Hainungu Secilia	Kawe	081 4778649	

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Windhoek, Khomas Region

MEETING DETAILS	
DATE	2 February 2021
TIME:	10:00 -12:00 and 13:00 to 15:00
VENUE:	**Hotel Thule**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaisance Energy Africa (Pty) Ltd (ReconAfrica). Dr Mwiya then introduced ReconAfrica's Environmental Social and Governance (ESG) Director Ms. Claire Preece as a guest speaker. Other key participants introduced during the meeting included Mr. Shakwa Nyambe as the Energy, Natural Resources, Commercial and Dispute Resolution Consulting Lawyer. The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators.

Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 and the now proposed 2D Seismic Survey activities of which an EIA process as part of the application for an Environmental Clearance Certificate (ECC) through the competent authority is being undertaken. It was with this background that she indicated the project implementation phase is at a very early stage with the core activity of data collection as part of the initial exploration activities. This data collected would need to be analysed and then a decision will be made on the way forward followed by a feedback consultation process. It is very hard to compare where we are as most countries are years ahead with their onshore exploration activities. We would like to not only work with the environmental community and interested stakeholders but with Namibians at large, because this country has diverse expertise including in communities that will help us move forward. Perhaps communities may not have the same level of expertise and education, but they have the indigenous knowledge and experience that will be helpful to everyone of us. We need to value their input like we value everyone's else because everyone is equal. We would like to be transparent and share this information with the communities for their input and move forward as part of a collaborative effective engagement strategy. The communities out there are frustrated because of opposing beliefs in the media as opposed to getting an insight on their opinion and trying to work together in unison.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey to be undertaken in Kavango East and West Regio through a PowerPoint presentation. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the morning and afternoon meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Most of the questions and comments raised had less to do with the EIA process for the proposed 2D Seismic survey activities but rather the already approved and ongoing Stratigraphic Well drilling operation. All the comments raised at the meeting have been included in appendix 1. Below are pictures to the public consultation meeting.

Figure 1: Public consultation meeting at Hotel Thule in Windhoek

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was extended from 29 January 2021 to **12 February 2021**.

5. CLOSE

The Morning session of the public consultation meeting ended 12:00 while the afternoon session ended at 16hrs.

APPENDIX 1: Questions / Comments / Concerns raised

	Questions / Comment / Issue raised
	Morning Session Questions and Comments
1.	A comment was raised as follows: An Environmental Impact Assessment (EIA) is incomplete until you have had all the questions from the Interested and Affected Parties (IAPs) answered and built in into the EIA report. The EIA for the stratigraphic well drilling and seismic survey are incomplete because you haven't had the questions raised and haven't yet answered them. They need to be built into the final EIA with the list questions and answers. We need to raise questions for the drilling EIA because its ongoing and there are shortcomings that needs answers.
2.	Reference to the presentation given, there is a statement that says at least 2 wells will be developed. It sounds like there is a possibility of more than 2 wells, can you explain what transparent objective indicators would motivate more than 2 wells? A response was given as follows: With petroleum agreements, there are actions that needs to take place, these actions need to be stated prior to an EIA process or any documentation of permitting. This the standard practice internationally. The commitment in the Petroleum Agreement is 3 wells. Because we want to be transparent we stated 3 wells that's the commitment in the Petroleum Agreement. We must do certain actions at a certain period of time, this is the standard practice everywhere in the world.
3.	According to international standards, ReconAfrica is not supposed to undertake any Well drilling activities prior to conducting a 2D Seismic Survey, why is this being undertaken the other way around? A response was given as follows: This is due to the planning, permitting and petroleum agreement set forward to ensure the process is done within the proposed timeframe otherwise the process takes longer than anticipated. There is also a performance agreement with the government, shall this not be fulfilled there would be penalties.
4.	The appointed Environmental Practitioner is not registered with the International Association of Impact Assessment (IAIA), how does that qualify the practitioner to undertake an EIA process?

	Questions / Comment / Issue raised
5.	What kind and how many community engagements have been undertaken? Within these meetings how many women and men attended the meetings? Was the presentation material presented translated into indigenous languages? A response was given as follows: More of this detail will be available when the minutes have been completed. 5 community meetings have been undertaken and more are still being planned. We had multiple translators to ensure consistency and additional translation where required. The presetation was simplified in an illustrative manner. Footage is available for how this was undertaken in the communities.
6.	The stratigraphic well drilling site has been developed on someone's Mahangu Crop field and right next to a community. The community is therefore being polluted? A response was given as follows: All issues and activities related with land acquisition for the stratigraphic Well drilling is done in consultation with the Traditional Authorities, Councilors and Headmen. An Environmental Management Plan exists for the implementation of the project. No pollution of any such is being emitted.
7.	The drill's cuttings pit on the project site has not been lined. This means toxins will pollute the groundwater and further into the Okavango delta through the Omatako river, as the well drilling operation is right next to Omatako river? The technical team is not available to give you a better perspective of the design infrastructure including the Cuttings Pit. We are at an early stage of project implementation and we will take the point raised into consideration.
8.	What is the long-term vision, does that include fracking and unconventional play? A response was given as follows: Fracking is not our cards, we would be dealing with conventional play.
9.	Please disclose the PTOs from the 3 sites being drilled currently at Kawe and Mbambi. There has not been a Shambyu King since 2 years ago, who signed those land agreements and at what authority, as expropriating of communal land requires a full council meeting and resolution to do so under the Communal Land Act.

	Questions / Comment / Issue raised
	A response was given as follows: The administrator of communal land Act is through the community courts, the Traditional Authority. Any issues related to land has to be undertaken in consultation with the Traditional Authorities. No activities can be done on a land without an authorization. All documentation is obtained through the Traditional Authority, Communal Land Board and the Councilors. If we are allowed to share such documents after consultation with the Traditional Authority, then we will be able to.
10.	Oil and Gas is a mining activity and ReconAfrica's project location is on communal land, why are we not protecting our indigenous people from this operation and what does the communal Land Reform Act state about this?
11.	The PR for ReconnAfrica is someone that works for media, is this not conflict of interest?
12.	Why are we investing in fossil fuel while on a global scale Oil and Gas prices are crushing while the newly elected American president's administration plans to cease funding for fossil fuel related projects. On a global scale, everyone is investing into renewable energy? Why are we not investing into projects with less environmental destruction such as renewable energy?
13.	What depth is the drilled hole at the moment?
14.	Is the plan to still to drill up to 900m, set casing, cement casing and placing the Blow Out Preventer (BOP)? if this is not done properly the deeper water from below could be forced up by pressure and contaminate useful good water aquifers close to the surface. The project area has potential for supplying water further south where good water is difficult to find. The BOP has to placed and developed properly and thoroughly approved by the right authority. A response was given as follows: The EIA previously completed indicates that information.
15.	There is quite a confusion, ReconAfrica previously has been talking about billions of barrels of oil to be discovered. at this stage and now talking about a sedimentary basin that is unknown. This is a complete conflict in information. A response was given as follows:

	Questions / Comment / Issue raised
	Sometimes companies are private and not publicly trading. When a company is publicly trading like ReconAfrica, the company needs to present what's being undertaken at that time based on the available geological data being used as this tie down to the operational activities on the ground but also be able to present a foreseeable future based on legal available data/information. This information is also presented with reasons why its foreseeable in that way. The investors relations will talk about what the potential is and we as a junior exploration company are going to talk about what our actions will be in terms of exploration activities step by step. In the beginning of the project, the geological review of existing aeromagnetic data was at a high level after additional reviews and more research it was abandonedly clear that it is convectional oil that would be look at and convectional oil does not do fracking, and that's where we are.
16.	On behalf of Kampinga Kamwale Conservancy (KKC), you have stated in a radio advertisement that you were going to have to send out invitations to conservancies management committees amongst those the KKC. The meeting that was held in Mbambi, did not invite the conservancy, the members of the management committee would like to know why? A response was given as follows: The meeting at Mbambi has not yet been undertaken and thereof is still being arranged.
17.	There is information claiming that anyone within 10 km radius of the stratigraphic Well drilling activities will be relocated? A response was given such that, we have clarified this in all meetings, during an oil exploration project there is no need to relocate any community.
18.	A comment was raised such that we certainly know there is a viable oil resource and the only way to acquire that resource is through fracking. A response was given such that, a response will be given at a later stage at such a comment.
19.	Do you feel fit to be absolutely independent and unbiased as an EIA practitioner as invested by law to undertake such a project? A response was given as follows: Yes, 100%. We have the appropriate experience to carry out all permitting requirements including EIAs for an Oil and Gas project.
20.	What type of gas are you managing? A response was given as follows: We are monitoring from C1 to C5.

	Questions / Comment / Issue raised
21.	Are you managing the rate of penetration in terms of the type of rocks being drilled? Response given: Yes
22.	What is your sampling intervals? A response was given as follows: We are trying to get as much information on this as possible, some detail we can't share at this stage.
23.	Are the following parameters being undertaken at the ongoing stratigraphic well drilling, wireline logging, gamma ray logging, deep resistivity, shallow resistivity and eutrophic? Response given: Correct.
24.	If your target Permian shales are much shallower than expected, are you still going to still drill down to 4000m and what is the target below the Permian shales? A response was given as follows: Yes, it is important for the country to understand the geology of the area. No information at present on the target below the Permian shales.
25.	If you encounter coal in your boreholes, will you be analyzing the quality of the coal? Calorific value, content and total volatility? A response was given as follows: Yes, we will sample every distinctive matter we find and try to preserve for more analysis.
26.	If you drill into granite, which is a possibility, please collect a big sample so that the Namibian Geological Survey can analyse it, those granite samples can be Aiken granite. A response was given as follows: The staff of the Geological survey are a member of the technical committee and yes that's a possibility.

	Questions / Comment / Issue raised
27.	Some of the aquifers could be deep and could be artisan, we know from the Owambo basin that some of that deep water is very saline, three times seawater salinity, please ensure the plug design plugs off all the aquifers in particular the deep ones so that these are not contaminated. We need the Water affairs, NAMCOR and Ministry of Mines and Energy to approve the plugs before they are used and should be cemented to ensure there is no absolute leakage
28.	If all the wells (3 Wells) are done, we are very worried that at that stage, the operation will cease, and wells not plugged properly. This needs to be approved.
29.	The 10% holding of NAMCOR is this carried holding, or do they have to pay a share of the exploration? A response was given as follows: This is being negotiated with NAMCOR. Based on past project experience, the 10% is carried over.
30.	A representative from the Ministry of Agriculture Water and Land Reform (MAWLR) stated that, MAWLR will collaborate with ReconAfrica and intends to visit the project site. All the input gathered from this public meeting is important such that when we visit the site we can ask the right questions. The MAWLR is already involved in the process. This is an ongoing process and there will be further investigations especially specific to water and possibly other issues. We need proper sound information in order for us to understand what is happening rather than stating claims and accusations without basis.
31.	When the EIA process for the Stratigraphic Well drilling was undertaken. A consultation process with the Regional Councils and Regional Governors and the high-level people was undertaken. In that EIA report I quote “overall this is discussion of input raised by site stakeholders they say overall proposed project activities has received greater positive support from IAPs because shall the results of the proposed petroleum drilling operation prove positive, it will tremendously and positively transform the local, regional, national status and economy landscape for the Kavango East, West and Namibia as a whole. This justifies our concern that this must be a wider EIA than just a 2D seismic Survey. They are telling people in the North that yes it’s going to transform your landscapes. There is no record of anyone raises issues of potential negatives, to me that shows that it is a potentially unbiased reporting to the presentation of the people in rural area. Therefore, It is important they need to know the potential negatives and as well as the potential positives. A response was given as follows:

	Questions / Comment / Issue raised
	Minutes to public consultation meetings are still being prepared and will be shared as part of the EIA Scoping Report. The comment quoted was not the consultants comment but a comment raised by one of the people gathered at the consultative meetings even through we tried to highlight we are still far away from a discovery. The broader picture of a discovery is a step to step process and that each step requires an EIA as it is a listed activity and therefore not all the steps are covered in the initial EIA. There is an accountability mechanism in each process that is in the law that allows ReconAfrica to make sure each step undertaken is accounted for in terms of environmental reporting and consultation. And if any step has a major negative impact I don't see how this will be given a go ahead and be implemented. By doing this approach you are able to account the entire process in a much more strategic and precise manner than try to have speculative assessment that has no facts because we don't even know the specific location of that geological structure in terms of the Area of Interest and the Petroleum agreement with the Ministry of Mines and Energy is also very clear on that, in terms of implementing the process step by step based on the results of the previous step. And that step by step is a listed activity in the Environmental Management Act hence we account it with the EIA
32.	We need a strategic Environmental Assessment for mining including Oil production in the Kavango Area.
	Afternoon Session Questions and Comments (Similar questions to Point 7 and 12 from the morning session were repeated in the afternoon session)
33.	Elephants are very sensitive to seismic anomalies for more than hundreds of kilometers. We have the largest population of savannah elephants in that area. It would be a great approach if we could trace the elephants and time log it to the seismic activities and implement a monitoring plan to ensure there is no interference with their whereabouts and or migratory routes. A response was given as follows: We do acknowledge your contribution to this. ReconAfrica is working closely with the National Parks and Wildlife division of MEFT to ensure that there is no interference with any elephant activities, this will be done through the implementation of a wildlife survey and monitoring programme. We also have to take into consideration that the seismic activities will be undertaken on already existing access roads used on daily basis for different commuters. The communities in these areas have not come across elephants, however this is something we will look at. The Seismic activities will be undertaken during the daytime elephants if present in the area are more sensitive to seismic survey wavelengths emissions at night time.
34.	What will be the timeframe of seismic surveys? A response was given as follows: One month.

	Questions / Comment / Issue raised
35.	We must all look at this project aspect on a much broader context in the sense that it's not only a Kavango project but the whole nation should be consulted this is due to the possibility of discovering commercially viable oil that becomes more of a national interest than a localized one we should early on start thinking the process of what if this is the case.
36.	The public consultation meetings should also include a virtual presentation that would allow those not available to attend such meetings to raise their concerns at a later stage.
37.	From an environmentalist's perspective, do we as Namibians want to go down this road when the world out there is getting out of fossil fuel? This is a conversation that really needs to start at a national level. The country is still granting exploration including Petroleum licenses, cancelling them would put the country in a different financial state. However, this could be discussed at a very high level, and the licensing regime would have to be revised and we should understand which direction we all want to go and whether we can afford that. All the associated Mineral laws and regulations will also need to be revised. Cancelling all the explorations licenses will also become battle in the court of law as a lot of investment has been put through these. It's also important to take into consideration that the process being implemented should be in compliance to all governing laws including the Environmental Management Act, and that an EMP being implemented on the ground raises all these requirements.
38.	The extension of comments submission is until the 12th of February 2021.

APPENDIX 2: Attendance Register

Morning session.

NCE Namibian Chamber of Environment

ATTENDANCE REGISTER

ReconAfrica Information Session

Group 1- 09:00 to 11:00, Hotel Thule,1 Gorges Street, Windhoek

No	Name	Organization/ Institution	Signature	Contact Number and Email address	Temperature
1	Andre du Pisani	University of Namibia		081212778	36.4
2	Auriol Ashby	Ashby Associates CC		ashby@acc.com.na	36.6
3	Bertchen Kohrs	Earthlife Namibia		08129 38085	36.4
4	Brigitte Weidlich	Freelance journalist		0811280961	36.0
5	Chris Brown	Namibian Chamber of Environment		ceo@m-c-e.org	36.
6	Clinton Hay	Namibia Nature Foundation		081405 9746 clinton.hay@gmail.com	36.3
7	Detlef Eberle	Consultant exploration & mining geophysics		081 778 1480 dgee@gmx.net	36.3
8	Ellanie Smit	Senior Journalist (Namibian Sun)		ellanie@namibiasun.com 081 205 05 18	35.5
9	Frank Steffen	Algemeine Zeitung			
10	Gunkila Friedhelm Voigts	Cactus Clean-up		081 381 2020	36.2 36.4
11	Frowin Becker	PHD Candidate		081 257 2573	36.2

NCE Namibian Chamber of Environment

ATTENDANCE REGISTER

No			Signature	Contact Number and Email address	Temperature
12	Gundula Wagner	Private		gundelwagner@gmail.com	36.1
13	Helge Bendl	Journalist		NEWS@HELGEBENDL.COM	36.2
14	Hilda Basson Namundjebo	Individual		md@oxygen.com.na	36.3
15	Hildegard Titus	Journalist		0817786607	36.6
16	Hilma N Angula-Neumbo	NACSO		scharleenangula@yahoo.com	36.6
17	Ina Shikongo	Private		Fridaysforfuture Windhoek@gmail.com	36.4
18	Jessica Bezuidenhout	Environmental Compliance Consultancy		"	36.5
19	John Hazam	Namibia Nature Foundation		081-396-3620 jh@nnf.org.na	36.3
20	Juliane Zeidler	WWF			
21	Jurgen Wagner	Private		0812460377 US294210@gmail.com	36.1
22	Karl-Heinz Hoffmann	Consulting Geologist		[illegible] 081 2723636	36.1
23	Lima Maartens	LM Environmental Consulting			
24	Ludwig Dieter	Consultant		~~[illegible]~~ 0811270693	36.1

NCE Namibian Chamber of Environment

ATTENDANCE REGISTER

No			Signature	Contact Number and Email address	Temperature
25	Martin Helm	Sinclair Services CC		081 277 8707	36.1
26	Mat Totten	Private		081 477 0573	36.3
27	Mathias Ricardo	Journalist (NMH)			36.6
28	Mbaitavera Kavari,	LLM Graduate		0818205826	37
29	Mr Waldo Junius	Namibia's National Commission for UNESCO			
30	Natalie van Wyk	Journalist (NMH)			34.4
31	Nichola Knox	Namibia University of Science and Technology		081 7300975	36.1
32	Pasquale (PV) Scaturro	Solitaire Land Trust		081 143 6166	36.1
33	Piet Smit	EAPAN		0817063051 pietjsmit@gmail.com	36.4
34	Rev Mike Yates	Anglican Diocese of Namibia		081-1244226	36.4
35	Robert de Villeirs	Staffing Specialist		232647	36.1
36	Rodney Amster	Individual		081 475 3300	36.2
37	Roger Swart	Consulting Geologist		081 1290957.	34.5.

NCE Namibian Chamber of Environment

ATTENDANCE REGISTER

No			Signature	Contact Number and Email address	Temperature
38	Ronelle Rademeyer	Journalist (NMH)		087127 8159	34
39	Rosalia Iileka	NACSO		0813581174	36.1
40	Rosalia Nuuyoma	Namibia's National Commission for UNESCO		0813061946	36.3
41	Roy Miller	Consulting Geologist		081 424 9886	36.1
42	Ruan Hough	Staffing Specialist		061237647	36.2
43	Samson Mulonga	WWF			
44	Shuu Mufika	Journalist (NMH)			35.7
45	Suzie Shifeni	Private			
46	Vera De Cauwer	Namibia University of Science and Technology		0812856334	36.5
47	Veston Malango	Chamber of Mines		0811276381	36.6
48	Werner Milke	Bushman Art Gallery cc		0811412455	36.3
49	ANDRE MOSTERT	NAMWATER		081 127 9266	3.4,8
50	SINDILA MWIYA	RBS		0814132 29	36.3
	Shakwa Nyamba	Recon		0811444585	36.3
	Nora Kasiteny	Recon			36.3
	Esther Kwangi	Recon			35.7
	Carla Amatheus	Recon.		081231705	36.1
	Annie Symonds	EDS		061220555	36.8

ReconAFRICA

Risk-Based Solutions (RBS) CC

Trace	Garren	0812487779	Townhouse Media	36.5
MARVIN	SANZILA	0814788279	RBS	36.6
July	Nafuka	0813656488	NBC	36.2
Festus	Mbendeka		NBC	36.1
FRANK	STEFFEN	0811240882	A2	36
~~Roy~~	~~Walters~~	~~0814249386~~		
CLEMENT	LAWRENCE	0813678090	WILDERNESS SAFARIS	36.3
Timo	Mufeti	0812444417	MEFT	36.0
Althea	Brandt	0812988682	EDS	36.4
Okia	Kaimbaraka	0813903066	SBD	37.0
Julius	Ngaikumbale	0816553104	SBD	36.4
Walter	Jumo	0814233434	Nature	36.2
Rayden	Tonia	0816592054	POGC	32.01
Ndapewoshali	Shapwanale	0812264509	RECO	36.4

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango East Region, Mutwegombahe Community, Kawe Area

MEETING DETAILS	
DATE	8 February 2021
TIME:	10:00 -12:00
VENUE:	Mutwegombahe **under a community Tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English into Rukwangali was done by the headmen Mr. Alois Gende. additional translation was assisted by Mr. Hausiku Hubert Sindimba, that has assisted with translations required in other meetings. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below are pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Mutwegombahe

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The community meeting ended at 12:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	We do understand that the seismic survey will be undertaken on existing access roads. Shall it so happen that an Oil and Gas field is discovered on the access road close to a community or on someone's land, what will happen to that specific land will that land be expropriated?
2.	Its clear that the community and land owners have surface rights and the state/ Government in terms of minerals exploration have subsurface rights. We also do understand that shall oil and gas be discovered below a land belonging to an individual person or community, production in terms of abstraction of the oil could be done elsewhere without infringing on the land owners' surface right. Will there at least be benefits for the owner of the land understanding the oil is below their grounds? A response was provided as follows: There will be an opportunity to discuss and negotiate benefits to not only the owners of the land but the entire community. The approach is similar to that of the mining industry and there are laws within the Traditional Authority and communal land rights that addresses this aspect. The Namibian government and ReconAfrica have entered into a petroleum agreement that also ensures not only the state benefits but also looks at direct community development opportunities. However, this will be entirely a different process and consultation will be undertaken at that stage when Oil and Gas has been discovered and feasible for economic purposes. The focus at this stage is data collection through the 2D Seismic survey and Stratigraphic Well drilling activities.
3.	We acknowledge Dr. Mwiya for a good illustrative presentation. However, can you discuss some of the negative impacts associated with the Seismic activities? The EIA process allows us to assess every detail of activity and determine its significant impacts on the environment. Where an impact is significant, management and mitigation measures are proposed. Specific to the on-going stratigraphic well drilling operation an Environmental Impact Assessment process was already undertaken, the potential impacts associated with that activity are not significant. A small portion of already disturbed land was cleared for construction of a temporary site. The drilling process is engineered in such a way that casing is used throughout the drilling process to avoid any potential water pollution. The 2D seismic Survey will not have any significant impacts either unless the survey activities divert from the proposed already existing access roads this would mean we would have to cut new lines and some vegetation will be removed in the process.

APPENDIX 2: Attendance Register

Community Meetings Stakeholders Register

Meeting Place (Village) Name. Mutwegombahe ...Date..08/02/2021... Time..10:30.....

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
1. Hausiku Albert	Mutwegombahe	0814278557		08/02/21
2. Matjai Daniel	" "	0814174600		08/02/21
3. Mazambo Eduard	" "	0813984404		08/02/21
4. Dumani Christian	" "	0812837134		08/02/21
5. Simon Kasinga	" "	0812594444		08/02/21
6. Maboforo Solom	" "	0818219442	Nganji sm	08/02/21
7. Gerson Shucerete	" "	0814666536		08/02/21
8. Alexander Kapinga K	" "	0816631354		08/02/21
9. Muzaal Mwambu A	" "	0813319043		08/02/21
10. Shihumbu Steven Nalumba	Mute	0814772869		08/02/21
11. Simaho Musese Andreas	" "	0817888870		08/02/21
12. Johannes Ngoma	" "	0814680187		08/02/21
13. Hiromno Paulus	" "	0812766734		

1

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
14. Mutumba Masikili		0814495238		08/02/2024
15. Martin Elias Anton		0817308338		08/02/2024
16. Veronika Siyema		0816052811		08/02/2024
17. Agatha Kaundu		0813192976		08/02/2024
18. Muteka Magnus	Mutweghombahe	0813048748		08/02/2024
19. Joseph Uparekre		N/A.	J.M	08/02/2024
20. Edward Kudumo	Mutweghombahe	0813469005		08/02/2024
21. Leopoldine Mundombe		N/A		08/02/2024
22. Astrid Musijida		0817485100		08/02/2024
23. Hamutenya Olotilde		0814423702		08/02/2024
24. Ndjamba Faustinus		0812927075		08/02/2024
25. Mushongo Kahare		N/A.	Mushongo	08/02/2024
26. Alois Gende	"	0812290613		08/02/2024
27. TIMOTEUS SINDIMBA	MUTWEGHOMBE	—	—	
28.				
29.				
30.				

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango East Region, Mbambi Community, Mbambi Area

MEETING DETAILS	
DATE	8 February 2021
TIME:	12:00 -14:00
VENUE:	Mbambi, **under a community Tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English to Romanyo local language also known as Gciriku language was volunteered by Mr. Hausiku Hubert Sindimba, a resident of Makandina Village. Mr Sindimba is fluent in Romanyo and presented so much confidence and professionalism in his translations and illustrations. Mr Hubert would also assist with translation in other meetings in the Kavango East Region. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below are pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Mbambi.

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was indicated as Friday, **29th January 2021**.

5. CLOSE

The community meeting ended at 14:00.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	We do understand that the seismic survey will be undertaken on existing access roads. Shall it so happen that an Oil and Gas field is discovered on the access road close to a community or on someone's land, what will happen to that specific land will that land be expropriated?
2.	Its clear that the community and land owners have surface rights and the state/ Government in terms of minerals exploration have subsurface rights. We also do understand that shall oil and gas be discovered below a land belonging to an individual person or community, production in terms of abstraction of the oil could be done elsewhere without infringing on the land owners' surface right. Will there at least be benefits for the owner of the land understanding the oil is below their grounds? A response was provided as follows: There will be an opportunity to discuss and negotiate benefits to not only the owners of the land but the entire community. The approach is similar to that of the mining industry and there are laws within the Traditional Authority and communal land rights that addresses this aspect. The Namibian government and ReconAfrica have entered into a petroleum agreement that also ensures not only the state benefits but also looks at direct community development opportunities. However, this will be entirely a different process and consultation will be undertaken at that stage when Oil and Gas has been discovered and feasible for economic purposes. The focus at this stage is data collection through the 2D Seismic survey and Stratigraphic Well drilling activities.
3.	We acknowledge Dr. Mwiya for a good illustrative presentation. However, can you discuss some of the negative impacts associated with the Seismic activities? The EIA process allows us to assess every detail of activity and determine its significant impacts on the environment. Where an impact is significant, management and mitigation measures are proposed. Specific to the on-going stratigraphic well drilling operation an Environmental Impact Assessment process was already undertaken, the potential impacts associated with that activity are not significant. A small portion of already disturbed land was cleared for construction of a temporary site. The drilling process is engineered in such a way that casing is used throughout the drilling process to avoid any potential water pollution. The 2D seismic Survey will not have any significant impacts either unless the survey activities divert from the proposed already existing access roads this would mean we would have to cut new lines and some vegetation will be removed in the process.

APPENDIX 2: Attendance Register

Community Meetings Stakeholders Register

Meeting Place (Village) Name..Mbambi.....Date..08/02/2021.. Time..12:49....

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
1. Antonia Belotia	mbambi	N/A.	A.B.	08/02/21
2. Ngondo Norini	mbambi	N/A.	N.N.	08/02/21
3. Makaka Cesilia	mbambi	N/A.	M.C.	08/02/21
4. Hanselim Shinna	mbambi	N/A	H.S	08/02/21
5. Ngondo Paulus	mbambi	0817670351	[illegible]	08/02/21
6. Alex Ngondo	mbambi	0812386899	A.N	08/02/21
7. Bonifatius Sikiwa	mbambi	0813961301	B.S	08/02/21
8. Ngondo Matheus	mbambi	0818200409	[illegible]	08/02/21
9. Sintango Joseph	mbambi	0817679694.	[illegible]	08/02/21
10. Makaka Indjawba	mbambi	081290052	[illegible]	08/02/21
11. Mandalena Mbezi	mbambi	N/A.	M.M	08/02/21
12. Eveline Kondo.N.	mbambi	~~081~~ N/A.	E.K.N.	08/02/21
13. Sintango Frans	mbambi	N/A.	S.F.	08/02/21

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
14. Muyaub & John. K.		0818190837	John	08/02/21
15. Kapindi Veronica		0813030701	[illegible]	08/02/21.
16. Mpande Elizabeth	Mbambi	0816437769	M.E.	08/02/21
17. Evalistus Shiimi	Mbambi	0812830991	[illegible]	08-02-21
18. Mahina Veronica	Mbambi	0813048931	Mahina	08-02-21
19. Mahina Virginia	Mbambi	0818048958	Mahina	08-02-21
20. Kamtongo Juakin	Mbambi	0812841415	K.J	08.02.21
21. Ndara Feblonia	Mbambi	0813385970	N.F	08-02-21
22. Jameya Emilia	Mbambi	0812601719	T.E	08-02-21
23. Kambinda Secika	Mbambi	N/A	K.S	08-02-21
24. Kamtongo Aune	Mbambi	N/A	K.A	08-02-21
25. Shihova Erica	Mbambi	0817045725	S.E	08-02-21
26. Shihova Regina	Mbambi	0812238951	S.R	08-02-21
27. Matamu Felistas	Mbambi	N/A	[illegible]	08-02-21
28. Linu Christine	Mbambi	0816952483	L.N	08-02-21
29. Simende A. Frans	Mbambi	0812749700	[illegible]	08-02-21
30. Ndara Evastus	Mbambi	N/A	Ndara	08-02-21

	NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
48.	Johand. JOKi		N/A.	J.J	8/02/2021
					8/02/2021
49.	felisia Vipandd		~~f.v~~ N/A	f.v	8/02/2021
50.	Angelind. Ihembd.			D.A.I	8/02/2021
51.	Domingo Vihembd.			D.V	8/02/2021
52.	Muyamba Clementine			M.C	8/02/2021
53.	~~Hun~~ Nangd Elizabetw		0816560015	N.E	8/02/2021
54.	Sinonge Anastasia		0818659907.	[illegible]	8/02/2021
55.	Cesilia Kavundd.		N/A	C.K	8/02/2021
56.	Mundu Alfonsine		N/A.	N.A.	8/02/2021
57.	ndarci Isabella		N/A	N.I	9/02/2021
58.	Mangbilita mundi		N/A	M.M	8/02/2021
59.	Thobias Ntjinano		0817902759	[illegible]	8/02/2021
60.	MBwanga Hoptin		Hoptim		8/02/2021
61.	Siremo Naimi		—	Siremo	8/02/2021
62.	Daniel Ntjamba	Mbambi	N/A	N/A	8/02/2021
63.					

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
64. Elizabeth Johaness	Mbambi	N/A		08/02/2021
65. Samba Pius	Mbambi	0818702360		08/02/2021
66. Namufinda Laurence	Mbambi	0812371090		08/02/2021
67. Ntjamba Markus	Mbambi	0816122901		08/02/2021
68. Joseph Mbundu	Mbambi	0814202591		08/02/2021
69. Vinashua Peter	Mbambi	0818957750		08/02/2021
70. Nelson Mapoghani	Mbambi	0813756997		08/02/2021
71. Sieline Kateua	Mbambi	N/A		08/02/2021
72. Petrus Kapenda	Mbambi	0812007894		08/02/2021
73. Mbuinga Ntjamba	Mbambi	0816573953		08/02/2021
74. Mbuinga Florias	Mbambi	0817024670		08/02/2021
75. Rufeny Fernando	Mbambi	0815504882	Rufenando!	08/02/2021
76. Munda Kateua	Mbambi	N/A	N/A	08/02/2021
77. Mashake Secilia	Mbambi	081 N/A	Kamba	08/02/2021
78. Dominga Paulina	Mbambi	N/A	N/A	08/02/2021
79. Sabele Kavo	Mbambi	N/A	N/A	08/02/2021
80. Immanuel Mayambi	Mbambi	N/A		08/02/2021

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
31. Petrus Mbumba	KIBAMBI	0818625548	Mbumba.	08/02/2021
32. Kangathi Annastasi		N/A.	Kangathi A.	
33. Lukas · M · Ndondi		0812476096		08-02-2021
34. Laurentius Sipango		0818684840		08-02-2021
35. Petrus Likuwa L		0815730553		08-02-2021
36. Petrus Mateyo		0812429750	P.M.	08.02-2021
37. Dominicus		N/A.	D.	08-02/2021
38. Mahina Andreas		N/A.	M.A.	08/02/2021
39. Sinkanga J	Vilambi	0812214136		08-02-2021
40. Thomas Sophia		0812686206	Sophia	08-02-2021
41. Muhepo Hausiku		0813529005	M.H.	08-02-2021
42. Kanjetu Amos		0811807767		08-02-2021
43. Lumubu George		0817355604	L.G.	08-02-2021
44. Musenge Manuel.		~~081~~ N/A	M.M.	08-02-2021
45. Kufunda Micheal.		0816935854		08-02-2021
46. Kandunda Maria		N/A.	N/A	08-02-2021
47. Shampapi B. M				08-02-2021

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
81 Nandjone Tjaimi	Mbambi	0813294060	[illegible]	8/02/2021
82. Anton Paulina	Mbambi	0812270029	[illegible]	8/02/2021
83. Kangangu Selma	Mbambi	0818767078	Selma	8/02/2021
84. Pauline Mukisi	Mbambi	N/A	[illegible]	8/02-2021
85. Sipena Alfons	Mbambi	0812976752	S. A	
86. Sasipapo Alex	Mbambi	0815946689	S. A	
87. Shivera Martinus	Mbambi	N/A	S. M	
88. Oliva Chihinga	Mbambi	N/A	O. C	
89. Haninga J Mbuna	Mbambi	N/A	H. M	
90. Mutero Kaunda	Mbambi	N/A	M. K	
91. Kamungendjo Maria	Mbambi	N/A	K. M	
92. Matendi Rosutha	Mbambe	0812212227	~~Km~~ M.K	
93. Cecilia Peter	Mbambi	N/A	C. Peter	
94.				
95.				
96.				
97.				

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING

Kavango East Region, Cuma Community

MEETING DETAILS	
DATE	8 February 2021
TIME:	16:00-17:30
VENUE:	Cuma **under a community tree used for meetings**
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

Dr. Sindila Mwiya thanked the attendant(s) for their availability and used the opportunity to introduce himself as the appointed Environmental Practitioner from (an independent environmental consulting company) Risk-Based Solutions CC (RBS) to undertake the EIA process for the proposed 2D Seismic Survey in PEL 73 on behalf on the proponent Reconnaissance Energy Namibia (Pty) Ltd a subsidiary of Reconnaissance Energy Africa (Pty) Ltd (ReconAfrica). The rest of RBS team including Mr. Marvin Sanzila as the EIA-Scoping Process Stakeholders Engagement Coordinator, Mr. Fidel Muyunda the Health and Safety Officer, Ms. Christine Links and Ms. Meriam Kauyama as Projects Administrators introduced themselves.

2. PRESENTATION

Dr Mwiya provided an overall perspective of the EIA process and project background to the proposed 2D Seismic Survey by using high definitive resolution printed posters for illustration of the project activities. Translation from English into Rukwangali was done by the headmen Mr. Alois Gende. additional translation was assisted by Mr. Hausiku Hubert Sindimba, that has assisted with translations required in other meetings. Dr Mwiya covered the following topics during the illustration presentation:

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);
- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. Below are pictures to the public consultation meeting.

Figure 1: Community consultation meeting at Cuma

4. CONCLUSION AND THE WAY FORWARD

Dr Mwiya outlined the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.
- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.
- The deadline for submission of comments for inclusion in the EIA process was extended from 29 January 2021 to **12 February 2021**.

5. CLOSE

The community meeting ended at 18:30.

APPENDIX 1: Questions / Comments / Concerns raised

No.	Questions / Comment / Issue raised
1.	There has been communication circulating regarding the submission of CVs for the stratigraphic well drilling operation at Kawe, we are assuming a lot of CVs has been received, has any of the people from the local communities employed? We have heard most contractors bring in their own team from out of the region and leaving no locals employed. A response was given such that, ReconAfrica has appointed a contractor that has appointed subcontractors to deliver different services from non-technical activities to specialized technical activities. The contractor including its subcontractors have requirements that needs to be fulfilled in terms of recruitment of localized services. There is local people working on site. We are at the very early stage of implementing the project, as the process carries on there will be other short-term employment opportunities that could also require recruitment of local people from Cuma to assist with the 2D seismic survey activities. This will be discussed with the Traditional Authority and the headmen.
2.	The headmen acknowledged the interactive illustration presented and reminded everyone that such a project has been done in many countries around the world and the process presented is similar to that undertaken on an international standard. The headman further expressed that, it would be difficult to disregard such a project of national interest that could bring about economic development in the communities. However, he emphasized that the project should directly benefit communities in the Kavango Region. Shall the area of interest reach Cuma area and specific to the 2D Seismic Survey at this stage, we would like to request for ReconAfrica to directly employ the local community of Cuma in assisting with the operation. We do understand we will not get employment if the area of interest is in Mbambi, as that should benefit the Mbambi community.
3.	The headman acknowledged all the community members for being present to such an important meeting and further highlighted that it is at such a meeting where clarity is provided on all misleading information circulating the communities. The illustration provided has answered many questions.

APPENDIX 2: Attendance Register

Community Meetings Stakeholders Register

Meeting Place (Village) Name....Cuma.....Date...08-02-2021. Time...16:27.....

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
1. Katiya willibard K	Cuma	0814834119		8/2/2021
2. Kandjimi Justinus	Cuma	0812225491		08/2/2021
3. Kufuna Nicolaus	Cuma	0814343211		8/02/2021
4. Kasera Magrath	cuma	N/A		08/02/2021
5. Kalimbwe Cornelius	cuma	081 472586		08/02/2021
6. Kupembona Benhard	cuma	N/A	K.B	08/02/2021
7. Karuli mathias	Cuma	N/A	K.M	08/02/2021
8. Sivombe petrus	cuma	0813037638		08/02/2021
9. Kashyeta pontianus	Cuma	N/A	K.P	08/02/2021
10. Sikali Bonifasius	Cuma	0812430015	S.B	08/02/2021
11. Sikongo Rifinus	Cuma	081 823309	S.R	08/02/2021
12. Likuwa moses	cuma	N/A		
13. Kasera Nicolaus	Matapi	0812050256		08/02/2021

1

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
14. Muronga Annamary		0815642309		
15. NKANDU FRANKILDE		0813202310	Nkandu	
16. Matamu Rosalia		0813163367	Matamu	
17. Nsamenki Martha		0813525571		
18. Fernando Regina		0816602670		
19. Katiua Reginalda		0814316504		
20. Ndumba Malita		N/A		
21. Kalunga Nicolous		N/A		
22. Kanyetu Shimaluba		0812871562		
23. Musiego				
24. Paulus Kambaro				
25. Karomo Molina				
26. Kangandhi Michael				
27. Kalomo Faustinus		0813993907	Kalomo	
28. Muyenga Andreas M		0814138871		
29. SHIRENDA ANDRAS C		0813767377		
30. Ntjamba George				

2

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
31. Shindipukol T.	Cuma			08/2/21
32. Ndara ~ Fabianus - D	Cuma			08/2/21
33. Kubumo Elizabeth	cuma	0812976203		08/02/21
34. Shiputa Lucia	Cuma	0813418928		08/02/21
35. Mupunga Anna	cuma	0816396182		08/02/21
36. Siguru Serafine	Cuma	0818177268		08/02/21
37. Siguru Susan	cuma	0814568192		08/02/21
38. Nyumba Aloys	Cuma	0 N/A	N. A	08/02/21
39. Rukoko Claus	Cuma	N/A		08/02/21
40. Pauline Uma	Cuma	N/A	N. A	08/02/21
41. Christine Kadumba	Cuma	N/A	N/A	08/02/21
42. Mupunga F	Cuma	0816213299		08/02/21
43. Edison - F Sipopa	CUMA	0814781194		08/02/21
44. Matamu Velalia	Cuma	N/A	M.V	08/02/21
45. Kalomo Susan	Cuma	N/A	K. S	08/02/21
46. Elizabeth Kaveto	Cuma	N/A	E. K	08/02/21
47. Mingeli Secilia	Cuma	N/A	M. S	08/02/21

NAME AND SURNAME	VILLAGE NAME	MOBILE NO.	SIGNATURE	DATE
48. Annastacia Liuma	Cuma	N/A	A. L	08/02/21
Susan Mwake	Cuma	N/A	S. N	05/02/21
49. Haushiku Kanunda	Cuma	N/A	H. K	08/02/21
50. Siguni Frolina	Cuma	N/A	S. F	08/02/21
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RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING WITH THE SAN COMMUNITY

Masambo, Bwabwata National Park, Western Zambezi Region

MEETING DETAILS	
DATE	18 March 2021
TIME:	16:30 -19:00
VENUE:	Masambo Community, Bwabwata National Park
VILLAGES REPRESENTED	• Masambo • Poca • Omega 3 • Chetto • Muteiku • Pipo • Ionxei
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2. **Key Notable Attendees:** • Chief Bennie Ngombara - (Chief of the Khwe Traditional Authority) and Facilitator of the meeting; • Mr. Mushavanga Tienie – Translator; • Ms. Claire Preece - ESG Director Reconnaissance Energy Africa (Pty) Ltd; • Mr. Robert Mwanachilenga- Reconnaissance Energy Africa (Pty) Ltd Namibian Consultant Project Manager; • Mr. Marvin Sanzila – EIA Practitioner - Risk Based Solutions CC; • Community members from various villages mentioned above.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

The honorable Chief Bennie Ngombara (Chief of the Khwe Traditional Authority) opened the meeting and welcomed the community that have made time to attend the meeting. Chief Ngombara emphasized the purpose of the meeting. This was followed by additional introductory remarks by the honourable Chief Bennie Ngombara (Chief of the Khwe Traditional Authority). Chief Ngombara acknowledged the presence of ReconAfrica and its team including Risk Based Solutions and the San community that have travelled from different villages to meet at this occasion. Cheif Ngombara further elaborated that he has been informed about misleading information brought to the attention of the San community through an earlier meeting undertaken at a campsite in the Bwabwata National Park without his consent. With the fact that the project is not being undertaken in the San community and that the earlier mentioned misleading meeting was undertaken in Bwabwata National Park that includes the San community, it is a great honour to finally have this opportunity for ReconAfrica to present what their project is about first hand in the sight of the San community. It is very important for ReconnAfrica to highlight any positive and negative outsets of the project activities and how this relates to the San community and understand whether such similar activities would extend to this area. The Chief's opening remarks were then followed by Ms Claire Preece (ReconAfrica ESG Director) illustrative presentation about ReconAfrica's project activities.

Ms Preece thanked the various communities for their availability and introduced ReconnAfrica's support team present at the meeting. She then emphasized that an agreement with the Namibian government exists for undertaking Petroleum Oil and Gas exploration activities in the Kavango Region. A map was presented to highlight the various Petroleum Exploration Licences in the country and point out where ReconAfrica's PEL No. 73 is located in the Kavango Region. Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 and the now proposed 2D Seismic Survey activities of which an EIA process as part of the application for an Environmental Clearance Certificate (ECC) through the competent authority is being undertaken. It was with this background that she indicated the project implementation phase is at a very early stage with the core activity of data collection as part of the initial exploration activities. This data collected would need to be analysed and then a decision will be made on the way forward followed by a feedback consultation process. The Namibian government have various laws that govern the petroleum exploration activities and it is within this framework that the exploration activities are being implemented and that an Environmental Impact Assessment has t be undertaken prior to any such activities. The technical aspect of the Stratigraphic Well drilling activity is engineered to avoid any cross contamination of groundwater aquifer. The process is monitored throughout, and measures are implemented to avoid any such impacts.

2. PRESENTATION

Ms Preece with additional input from Mr. Mwanachilenga provided an overall perspective of the project's technical background process to both the 2D Seismic Survey and the current Stratigraphic Well drilling operation at Kavango East. The following topics were covered during the illustrative presentation, additional material including High Resolution posters were used to guide the presentation and detail about the EIA process.

- Background to Oil and Gas origin and exploration process;
- Background to the proposed petroleum exploration (2D seismic Survey);

- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. All the comments raised at the meeting have been included in appendix 1. Below are pictures to the public consultation meeting.

Figure 1: Public consultation meeting at Masambo community

4. CONCLUSION AND THE WAY FORWARD

The following points were outlined as the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.

- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.

5. CLOSE

The community meeting ended at 12hrs.

APPENDIX 1: Questions / Comments / Concerns raised

	Questions / Comment / Issue raised
	Questions and Comments
1.	A comment was raised such that, as a community of Masambo, we would like to voice our own opinion and not an opinion raised on our behalf by the associations. Having said that, perhaps these associations have the knowledge and understands the possible nnegative outcomes of ReconnAfrica's project on the environment and the San community.
2.	A comment was raised such that the Namibian government may have approved the ReconnAfrica's project due to potential financial kickbacks/ benefits on certain individuals in the government while at the same time are ignorant of the potential impacts of the project on the environment and the community. A response was given such that, such a statement is based on misleading information. There are many examples around the world where Oil and Gas Exploration projects have been undertaken successful by the relevant and qualified technical expertise. The similar project can be undertaken in Namibia without significant impacts. Environmental Impact Assessment studies are undertaken prior to any project implementation and there are other governing laws that need to be complied to prior to any of the activities. ReconnAfrica's proposed project is based on facts and appropriate technical expertise substitiated by research and analysis. The same approach undertaken in other country can be applied here without compromising the environment and its people. Technology has advanced over the years and based on learned lessons we have the advantage implement a better project. Ebnvoironmentla Laws have gotten better over the years and therefore this can be done appropriately.,
3.	Clarification was requested relating to the proposed 2D seismic survey operation and the seismic survey lines. Illustrative posters material were used to explain the process required in undertaking a 2D Seismic Survey and all the equipment used. Relevant to the proposed survey, all activities would be undertaken in existing road access infrastructure.
4.	A comment was raised such that, ReconnAfrica's project is being undertaken in the Kavango Region and has no influence on the San community and therefore we should continue to support it as the government has approved it and perhaps at later stage this will benefit our community also.
5.	It is clear the information shared earlier before this meeting was the wrong information. As it is a total different picture from what has been presented in the media and meetings undertaken in the Bwabwata National Park.

Appendix 2: Attendance Register

ReconAFRICA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

COMMUNITIES ENGANGEMENT ATTENDANCE REGISTER

Date: 17/03/2021
Venue: MASAMBO
Time: 16:42

Please write clearly!

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
Thomas frankie	Musambo			
Benson Obert	Masambo			
Diwadamo Abel	masambo			
MASILISO STANLY	MASAMBO			
Malambo Morison	Mashambo	0818[illegible]2925		
Dixon Sikumbo	pocu	0817880649		
Ndala Isibi				
Tanaho Lucas				

ReconAFRICA

Risk-Based Solutions (RBS) CC

ReconAFRICA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
Andreas Nullo	Mukoi poca			
Masiliso At Teffy	Masambo			
Messi Zulu	Masamba			
Veronica Kasamba	Shega 3			
UGORO BEAUTY	Masambo			
July Piyens	Masambo	0812398032	www.julypiyens@gmail.com	
Robert frech	Masambo	0812527243	N/A	
Munyingwa Dennis	Masambo	0815656427	N/A	
Diwadamo Sagaria	Masambo	0817334884	N/A	Sagaria
Munyingwa likezo	Masamba	0817514751	N/A	
Joga Johanna	Poca	0818355629	N/A	

ReconAFRICA

Risk-Based Solutions (RBS) CC

ReconAFRICA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
Boonsen Folin	Masambo	0817203515		[illegible]
Elias Sentia	Masambo	0817615977		SENTIA
Selo Diwanamo	Masambo	0818152527		SELO
Amos Julia	Masambo			M. AMOS
Nduho Kashenu	Masambo			Nduho
George Thitako	Masambo			Thitako
Anderson yanda	Masambo			Yanda
Joga Somoli	Poca	0813608766		[illegible]
Abraham Iiya	Poca	081 7060591		L.A
Joga Diana	Poca	N/A		[illegible]
Andraham frieda	Poca	N/A		[illegible]

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
Shorty Willy	Masamba	081 454741	N/A	willy
Simangolova Vasco	Masamba	0817632548	N/A	Vasco
Pieter Masiliso	Masamba	081444965 7	"	
Were Kadefa	Masamba	081 6246736	kadefawer	
STALINE KADIRA	MASAMBO	081605027 5	kadirae gmail.com	
BLACK MAHINGI	OMEGA 3	—	—	—
John Kambathi	Muteiku	—	—	—
Mayundu Wilson	Pipo	—	—	
Mahingi Frans	PiPo	—	✓	frans
Pretorius Nauti	Pipo	—	N/A	
Muyambango Joseph	chetto	0816522427	N/A	

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
Erica muyatwa	Chetto	0815563633	N/A	erica
Diria Jerina patricia	Chetto	0816922139	N/A	Diria
SINGWANGWA Boonsen	Masambo	0813491253	N/A	[illegible]
Quaba Petrus	Masambo		N/A	[illegible]
Jotter J	Masambo		N/A	[illegible]
Masiliso NDELINDELU	Masambo		N/A	X
Boster Mautu	omega3	0812326176	N/A	B'Mautu
Luckroo Treza	IONXEI	–	–	TRE
DIJOHN ALBERT	IONXEI	–	–	[illegible]
william petrus	IONXEI	–	–	[illegible]

RECONNAISSANCE ENERGY NAMIBIA (PTY) LTD

PUBLIC CONSULTATION PROCESS

ENVIRONMENTAL SCOPING PROCESS TO SUPPORT THE APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE (ECC) FOR THE PROPOSED 2D SEISMIC SURVEY COVERING THE AREA OF INTEREST (AOI) IN PETROLEUM EXPLORATION LICENCE (PEL) NO. 73, KAVANGO BASIN, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

MINUTES OF COMMUNITY MEETING WITH THE SAN COMMUNITY

Omega 1, Bwabwata National Park, Western Zambezi Region

MEETING DETAILS	
DATE	18 March 2021
TIME:	10:00 -12:00
VENUE:	Omega 1 Community, Bwabwata National Park
VILLAGES REPRESENTED	• Omega 1; • Chetta • Mangarangandja • Mutjiku • Mushashani • Mshasho
PURPOSE:	1. To inform the stakeholders about the proposed 2D Seismic Survey operations in PEL 73 by the Proponent (ReconAfrica) and the ongoing environmental permitting process for the proposed 2D seismic survey being undertaken by Risk-Based Solutions CC, the Independent Environmental Consultant led by Dr Sindila Mwiya, the Environmental Assessment Practitioner (EAP) in order to obtain Environmental Clearances Certificate (ECC) for the proposed activities as required by the national legislations and regulations. 2. To obtain inputs from the stakeholders as part of the permitting requirements to obtain the ECC.
ATTENDANCE:	Refer to Attendance Register in Appendix 2. **Key Notable Attendees:** • Chief Bennie Ngombara - (Chief of the Khwe Traditional Authority) and Facilitator of the meeting; • Mr. Thidhiringo Sakoi – Headman; • Mr. Mushavanga Tienie – Translator; • Ms. Claire Preece - ESG Director Reconnaissance Energy Africa (Pty) Ltd; • Mr. Robert Mwanachilenga- Reconnaissance Energy Africa (Pty) Ltd Namibian Consultant Project Manager; • Mr. Marvin Sanzila – EIA Practitioner - Risk Based Solutions CC; • Community members from various villages mentioned above.

1. OPENING OF THE MEETING AND GENERAL INTRODUCTION

COVID-19 Regulations regarding sanitisation, masks and keeping a distance were emphasized during the meeting. Each participant was requested to complete an attendance register for record purposes.

The headman Mr Sakoi opened the meeting and welcomed the community that have made time to attend the meeting. Mr. Sakoi emphasized the purpose of the meeting such that, this is an opportunity for all present to clarify any misleading information brought to the San community's attention earlier regarding an Oil and Gas operation being undertaken in the Kavango East and West Region. This was followed by additional introductory remarks by the honourable Chief Bennie Ngombara (Chief of the Khwe Traditional Authority). Chief Ngombara acknowledged the presence of ReconAfrica and its team including Risk Based Solutions and the San community that have travelled from different villages to meet at this occasion. Cheif Ngombara further elaborated that he has been informed about misleading information brought to the attention of the San community through an earlier meeting undertaken at a campsite in the Bwabwata National Park without his consent. With the fact that the project is not being undertaken in the San community and that the earlier mentioned misleading meeting was undertaken in Bwabwata National Park that includes the San community, it is a great honour to finally have this opportunity for ReconAfrica to present what their project is about first hand in the sight of the San community. It is very important for ReconnAfrica to highlight any positive and negative outsets of the project activities and how this relates to the San community and understand whether such similar activities would extend to this area. The Chief's opening remarks were then followed by Ms Claire Preece (ReconAfrica ESG Director) illustrative presentation about ReconAfrica's project activities.

Ms Preece thanked the various communities for their availability and introduced ReconnAfrica's support team present at the meeting. She then emphasized that an agreement with the Namibian government exists for undertaking Petroleum Oil and Gas exploration activities in the Kavango Region. A map was presented to highlight the various Petroleum Exploration Licences in the country and point out where ReconAfrica's PEL No. 73 is located in the Kavango Region. Ms. Preece offered a background perspective on the Project Planning and Implementation progress associated with ReconAfrica's Oil and Gas exploration drilling activities of Stratigraphic Wells in PEL 73 and the now proposed 2D Seismic Survey activities of which an EIA process as part of the application for an Environmental Clearance Certificate (ECC) through the competent authority is being undertaken. It was with this background that she indicated the project implementation phase is at a very early stage with the core activity of data collection as part of the initial exploration activities. This data collected would need to be analysed and then a decision will be made on the way forward followed by a feedback consultation process. The Namibian government have various laws that govern the petroleum exploration activities and it is within this framework that the exploration activities are being implemented and that an Environmental Impact Assessment has t be undertaken prior to any such activities. The technical aspect of the Stratigraphic Well drilling activity is engineered to avoid any cross contamination of groundwater aquifer. The process is monitored throughout, and measures are implemented to avoid any such impacts.

2. PRESENTATION

Ms Preece with additional input from Mr. Mwanachilenga provided an overall perspective of the project's technical background process to both the 2D Seismic Survey and the current Stratigraphic Well drilling operation at Kavango East. The following topics were covered during the illustrative presentation, additional material including High Resolution posters were used to guide the presentation and detail about the EIA process.

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- Background to the proposed petroleum exploration (2D seismic Survey);

- An Overview of the natural receiving environment around the proposed Survey Lines (Detailed Survey Lines Locations) for the proposed 2D Seismic Survey;
- The likely positive and negative environmental impacts to be assessed as part of the Impact Assessment Phase of the EIA process;
- An opportunity for Interested and Affected Parties (I&AP) to provide input throughout the EIA Scoping process.

3. DISCUSSION (QUESTIONS AND ANSWERS SESSION)

A number of questions, comments and issues were raised during the meeting. These have been recorded in Appendix 1 and will be addressed as part of the EIA process. Where a response was provided, the response has been included in the table. All the comments raised at the meeting have been included in appendix 1. Below are pictures to the public consultation meeting.

Figure 1: Public consultation meeting at Omega 1, community Hall

4. CONCLUSION AND THE WAY FORWARD

The following points were outlined as the conclusion of the presentation/ illustration and the way forward as follows:

- The proposed 450 km Long 2D seismic survey is nonintrusive methods, will use environmentally friendly equipment, will be conducted along existing roads and tracks, will create local temporary job opportunities, contribute to the national fiscus and will have temporary, localised and low negative impacts on the receiving environment.

- Field-based flora, fauna, review the existing socioeconomic, archaeological, vibrations, dust, and noise reports and preparation of EIA and EMP Reports shall be undertaken to support the application for Environmental Clearance Certificate (ECC).
- We are committed to working with all the stakeholders with respect to the proposed 2D Seismic survey and we will continue to work with the Kavango East Region regional leaderships, traditional leaders and local communities and all I&APs.
- Oil and gas exploration is indeed an expensive journey and if we are to compare it to a journey from Windhoek to Rundu, ReconAfrica has left Windhoek but has not yet even arrived in Okahandja since they left in 2015 when the license was granted.
- However, in order to fund the journey to the intended destination which is Rundu, ReconAfrica or any other resources exploration company must market a vision about the final destination even though there are no guarantees that the final destination will be indeed Rundu which could be equated to a commercial discovery at the end of an exploration / prospecting programme.

5. CLOSE

The community meeting ended at 12hrs.

APPENDIX 1: Questions / Comments / Concerns raised

	Questions / Comment / Issue raised
	Questions and Comments
1.	A comment was raised such that, a detailed consultation process is required with the San community shall the proposed project need to be implemented in the Bwabwata National Park. A response was given such that, the project is not being implemented in the Bwabwata National Park but such that the stakeholder engagement meeting is required to provide detail about ReconnAfrica's ongoing Stratigraphic Well drilling operation at Kawe in Kavango East and the EIA process to the proposed 2D Seismic survey operation
2.	A question was raised such that, shall the exploration project both the Stratigraphic Well drilling and 2D Seismic survey be implemented in the San Community, what would be the process implemented for possible jobs recruitment as most of the San community do not have the technical skills neither the appropriate education qualification to be employed. A response was given such that, after undertaking the required EIA process in the San community and obtaining the appropriate permits including the Environmental Clearance Certificate (ECC) the employment recruitment process would entail looking at the available technical skills and where required training will be provided. It is also important to understand that the Exploration process would provide short-term employment.
3.	A comment was raised such that, the San community welcomes any project providing positive socio-economic impact to the community. However, it seems ReconnAfrica's project may also have negative impacts on the environment, either way, we the san community are desperate for work.
4.	What is the intention of such a presentation meeting provided as this project does not concern this community? A response was given such that, this is an information sharing meeting and ReconnAfrica has identified the need to share project information with the San Community
5.	A comment was raised such that, the socio-economic development in the San community is being guided and also hindered by the Nature Conservation and Karamas Association in such a way that the community does not benefit directly from development. Shall ReconnAfrica decide to implement the project in the community, these association would be involved. What is the stratergy that would be implemented to ensure this is not the process? A response was given such that, ReconnAfrica acknowledges such a comment. It would be within its mandate to ensure that, the community is aware of such of such practices raised in this meeting and that each member of the community is given a voice and a fair opportunity to raise such concerns. We do understand that such associations may have good intentions but not that of the community's direct opinion. Shall we intend to implement the project in this area, we would like to build a strong relationship with the community at this instance ReconnAfrica is only sharing information about the project in Kavango

	Questions / Comment / Issue raised
	East and West regions.
6.	A comment was also raised such that, the San community would like to focus its attention on the intended purpose of the stakeholder's engagement and avoid discussions relating to the different associations hindering development in the community.
7.	A question was raised such that can ReconnAfrica confirm that the project will not bring about irreversible environmental impacts wherever its being undertaken, this is based on the information circulating in the media? A response was given such that, the Namibian government including the guiding constitution have laws to ensure a project related to petroleum exploration undergoes an EIA process prior to its implementation and that the project is implemented based on an Environmental Management Plan. There is no significant environmental impacts anticipated neither is the project being undertaken on the said river banks. An illustrative poster was used to explain the locations of the stratigraphic well drilling and proposed 2D Seismic operation and findings relation to potential environmental impacts.
8.	A question was raised such that, is there any opportunity that a couple of water boreholes can be drilled in our community as water is a scarce resource in this area? A response was given such that, this could be discussed at a later stage as the current focus is the proposed Wells and 2D seismic operation in the Kavango East and West region. However further internal discussions around this will need to be undertaken as the Chief has also raised the need for such an opportunity in the community.

Appendix 2: Attendance Register

ReconAFRICA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
Erica muyatwa	Chetto	0815563633	N/A	erica
Diria Jerina patricia	Chetto	0816922139	N/A	Diria
SINGWANGWA Boonsen	Masambo	0818491253	N/A	[illegible]
Quaba Petrus	Masambo		N/A	Petrus
Jotter J	Masambo		N/A	JTP
Masiliso NDELINDELU	Masambo		N/A	X
Boster Mautu	omega3	0812326176	N/A	B' Mautu
Lackroo Treza	Ionxei	–	–	TPE
Diuoka Albert	Ionxei	–	–	[illegible]
william petrus	Ionxei	–	–	[illegible]

ReconAFRICA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
9. Stephanus Dikosthi	Mutjiku	0818149082	—	
10. MBONG GERTJIE	Mutjiku	0817651557	mbonggerk75@gmail.com	
11. KUNI DANGO	" "	—	—	X
12. BENARD POKKO	" "	081-3837886	—	
13. KAPINGA FRANKIE	Mushashani	0818235894	chrispienndu.11@gmail	
14. KAMBATHI DANIEL	Mushashani	0815516820	Kambathidaniel7@gmail.com	
15 Sitengu Botha	Mushashani	0813224253		
16 Johaness Thomas	Mushashani	0817072566	—	Tomas
17. Amico Muhako	Mushashani	—	—	
18 NDJUNGA John	Chetto	0813606803	ndjungaj@gmail.com	
19. Govaque Jankie	Omega	0817874072/ 0814122997	Jackiesankiejohannes	Jankie

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

	NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
20.	RONGWAM TEON	MSHASHO	—	—	
21.	Mundjumo Lindeku	Mangarangandja	0814181886	—	
22.	Mambe Eugenie	Omega 1	0810107643	-	
23	Ndara Maria	Omega 1	0814057486	—	Maria
24	Kazungo Rungura	Omega 1	081 6295362	—	
25	mushongo Pankrasia	omega 1	—	—	P.m.s
26	Ashipala Michael	Omega 1	0818733351	—	
27	Haugoe maritin	Omega 1	0812425517	—	
28	MRS Ngungwe Sonia	Omega 1	0813413419	Singugwe@gmail	
29	Mambo Munyinta	Omega 1	—	—	
30	Jennie Demumanonga	Omega 1	—	—	

ReconAFRICA

Risk-Based Solutions (RBS) CC

ReconAFRICA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

	NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
31.	TSUPA GUFFY	Omega 1	0814187874	—	GUFFY
32.	FESTUS Hafeni P	Omega 1	0816290954	festusH93	[illegible]
33.	Dinako Cynthia	Omega 1	0815592891	—	[illegible]
34.	Jacobous Tuhafeni	Omega 1	0860510418	—	[illegible]
35.	KANDJIMI SIMSON SIYAYE	OMEGA 1	0818570075	Kandjimisimson@gmail.com	[illegible]
36.	Kazunao Buhefa	omega 1	—	—	nita
37.	Laura Nashipili	Omega 1	081 898 4050	unliciousuno@gmail.com	[illegible]
38.	Maria Shivolo	Omega 1	081 5728574	mariashivolo@gmail.com	Sh.m
39.	Tumane yakomena	Omega 1	081 1732948	—	[illegible]
40.	Dinako Sendia	Omega 1	081 5592891	—	DINAKO
41.	OSHA Rosalia	omega 1	0816243973	—	OSHA

RECONNAISANCE ENERGY NAMIBIA (PTY) LTD
STRATIGRAPHIC WELL DRILLING OPERATIONS & PROPOSED 2D SEISMIC SURVEY IN PEL NO. 73, KAVANGO WEST AND EAST REGIONS, NAMIBIA

ReconAFRICA

	NAME AND SURNAME	VILLAGE	TEL/ CELL NUMBER	E-MAIL	Signature
42.	THOMAS WINDJAS	OMEGA 1	N/A	N/A	[illegible]
43.	Sheehama muaidiva	Omega 1	N/A	N/A	[illegible]
44.	moyo mate	omega 1	N/A	N/A	mate
45	NEGAGO MATHEUS	OMEGA 1	0812115597	N/A	[illegible]
46	manu LOUENUS	Omega 1	0815807682	N/A	M Louenus
47	KANGUNGU JOSEPH	OMEGA 1	0815935844	N/A	[illegible]
48	Mbunga Pauline	omega 1	N/A	N/A	Pauline
49	Tsupa Nduva	Omega 1	0846817 12	N/A	nduva
50	Mushavanga Lenny	Omega 1	N/A	N/A	Lenny
51	DCAMIAN ALFRED	OMEGA 1	0817474085	dcamian860@gmail.com	[illegible]

NAME	VILLAGE	TEL
Kapinga Kepie	Omega 3	0812838241
Kapinga William	Omega 1	0817707580
Dhako Basani	Mshatho	0812828086
Kawana Tuife	Omega	~~0812~~ 2 6905987 081
Hausiku Joseph	Omega	0813285002
Petrus Aupindi	Omega	0814074701
Johannes Soubios	omega	0814630508
Patila Mushavanga	Omega	0812081652
10 Mupairo Meriam	Omega	0814054699
11 Muhunga	omeg	
12 Shanamange Linea	omega 1	061-244860 7

Annex 3-6- Public Notices Adverts Stakeholder Register Detailed for 2D Seismic Survey

March 2021

DETAILED STAKEHOLDER REGISTER AND COMMUNICATIONS

Submitted Registrations Based on the Draft Scoping Report Public Advertisements and Where a Submission has been Made an Insert has been included in this Register

NOTE: This Stakeholder Register Excludes Separate Registers for the Various Meetings Undertaken

OPENED 7TH JANUARY 2021

PROPOSED 2D SEISMIC SURVEY OVER THE AOI IN PEL 73, KAVANGO WEST AND EAST REGIONS, NORTHERN NAMIBIA

No.	**STAKEHOLDER DETAILS**
1.	From: Emma Wareus <emma@hellodobby.com> Sent: Friday, 26 February 2021 9:29 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance
2.	From: Savvy Ridge <savvyridge@gmail.com> Sent: Thursday, 25 February 2021 11:41 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Sent from my Huawei Mobile
3.	**From:** Nabeelah Mia <nmia@cer.org.za> **Sent:** Monday, 8 February 2021 6:33 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Nabeelah Mia (she/her) Attorney Centre for Environmental Rights NPC A non-profit company with registration number 2009/020736/08 PBO No. 930032226, NPO No. 075-863, VAT No. 4770260653 and a Law Clinic registered with the Legal Practice Council First Floor, DJ du Plessis Building, West Campus, University of the Witwatersrand Braamfontein, 2001, South Africa

	M: +27736370048 nmia@cer.org.za www.cer.org.za www.facebook.com/CentreEnvironmentalRights www.twitter.com/CentreEnvRights
4.	From: Nicole Macheroux-Denault <nicole.macheroux@gmail.com> Sent: Monday, 8 February 2021 4:54 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Kind regards Nicole Macheroux-Denault
5.	**From:** Nahor Howoseb <nahordave@gmail.com> **Sent:** Monday, 8 February 2021 11:31 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
6.	**From:** Kayleigh Murray <kayleigh.mur@gmail.com> **Sent:** Monday, 8 February 2021 10:49 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Cc:** savetheokavangodelta@gmail.com **Subject:** I&AP for EIA on ReconAfrica's 2D Seismic survey Dear Dr. Mwiya, I would like to register as an I&AP for the EIA on ReconAfrica's proposed 2D seismic survey operations and receive all relevant documents. My phone number is 0825217666, full name Kayleigh Murray, Organisation Stellenbosch University, Department of Botany and Zoology. Kind regards, Kayleigh Murray.

7.	**From:** Corinna Van Cayzeele <cc.vancayzeele@outlook.com> **Sent:** Saturday, 13 February 2021 1:28 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; smwiya@rbs.com.na **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya, In the absence of further guidance for submission of statements, I am sending my brief comments to you by e-mail. My name is Corinna Van Cayzeele, phone number +44 75 1720 9670, I write as a conservation scientist and global citizen, not as representative of an organization. First, it is not clear to me why test drilling already began in January, when the application process for Environmental Clearance is only at the Scoping Stage and affected parties, including indigenous peoples, were not comprehensively consulted before. While this makes me strongly question the validity of your approach, I hope to see a turnaround as the ECC application process proceeds. The argument of only conducting a survey and testing for oil does not count as the plan is unambiguously to exploit any oil fields found. How is the potential damage to local communities and the wider affected human population, the ecosystem and wildlife supposed to be equally offset? However, the devastating impacts on people's lives, ecological balance and endangered species would start before that. Pump testing for oil could contaminate the groundwater in the aquifer underlying the area. Most of the trees in the area have deep roots to tap into the groundwater, so will also suffer if the groundwater is contaminated which could trigger an ecosystem collapse. Furthermore, as you will be aware, the Kalahari lies on a connate sea- if this water table is raised due to drilling activities the freshwater ellipse could also be contaminated. In your scoping, you say how important the oil exploitation following the Seismic survey would be to help future generations escape poverty and reach the climate goals in the long term. The fact that this statement proves a misunderstanding of the urgency of the climate crisis and required actions to slow it is only the least concerning part of it. The poverty and misery you are describing will hardly improve if you put the groundwater supply and its quality at risk and destroy large parts of a network of ecosystems vital to prevent desertification. The joint expertise, energy and power within Recon Africa and its funding providers could be used to promote the financial potential of sustainable energy business in Southern Africa, such as solar energy. It could help enable people, biodiversity, and the health of the planet on which we all depend to thrive rather than to restrict this possibility and start to destroy one of the world's most precious forest systems and wetlands. In the hope of a more thorough and complete EIA, adequate consultation of stakeholders not reached by internet, and the compliance with Canadian and international environmental best practice standards in any future venture, I remain with Kind regards, Corinna Van Cayzeele --- **From:** Corinna Van Cayzeele <cc.vancayzeele@outlook.com> **Sent:** Sunday, 7 February 2021 7:30 PM

	To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Corinna Van Cayzeele M.Sc. International Nature Conservation Officer 2 Environmental Assessments, Natural Resources Wales Project Development Advisor, African Alliance for Developmental Action
8.	**From:** Dylan Luke <dylanmethinks@gmail.com> **Sent:** Friday, 5 February 2021 10:41 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
9.	**From:** Haita Werner <haitawerner8@gmail.com> **Sent:** Thursday, 4 February 2021 7:13 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
10.	**From:** Karen <kreidsa@gmail.com> **Sent:** Friday, 29 January 2021 7:28 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
11.	**From:** Anja Plessis <anja.dup2@gmail.com> **Sent:** Tuesday, 2 February 2021 1:24 PM

To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com
Subject: Interested Party for 2-D Seismic Survey EIA

Dear Dr Mwiya,

I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies.

Thank you so much for your kind assistance,
Anja du Plessis

From: Anja Plessis <anja.dup2@gmail.com>
Sent: Tuesday, 2 February 2021 1:18 PM
To: Teofilus.Nghitila@met.gov.na; frontdesk@rbs.com.na
Subject: REF ReconAfrica's Seismic EIA Scoping Report.

Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya Environmental Assessment Practitioner (EAP).
Please see my previous email on the issue, and note that I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia.
This is a letter to formally register my very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I am concerned to hear that while it states on
Page 80 Table 3.2 of the scoping report says that "No removal of protected species or mature trees are anticipated because the activity will require the widening the existing tracks as may be applicable." This is concerning considering, as I am sure you are aware, there are a number of protected species in the license area. This plan to run huge teams of trucks hundreds of kilometres through deep bush in a protected wilderness area will obviously do huge amounts of damage. This is obvious from the photo of Line EW5 on Plate 1.24 on page 37 of the Scoping Report, where hundreds if not thousands of trees will have to clear hundreds of kilometres to widen the road for the huge trucks.
I could not find any studies on whether nesting birds will be killed, what kind of plants will have to be destroyed and where, or what indigenous trees might be killed. This is especially distressing as most of the tracks they want to use are in the bed of the Omatako river, meaning this activity would definitely fall within 100 meters of a watercourse, see Plate 1.21 page 34, where the line is right next to the riverbed.
It is clear to me that this rushed scoping report, which is designed to eliminate the need for environmental oversight like the Forestry Act, 12 of 2001 and The Nature Conservation Ordinance 4, 1975. What are the long-term implications of these new wide roads on poaching? On illegal plant harvesting? The EAP doesn't include any data about this at all! Due to this, we ask you to set aside this ECC request until proper scientific studies on these impacts can be done.
In Texas, 142 homes were damaged by seismic testing like the sort ReconAfrica wants to carry out along the settled roads of Kavango East and West. Many hundreds of homes, many made from mud or light brick and concrete, are within a hundred meters of the roads that ReconAfrica wants to shoot their seismic test lines on. Serious home damage, not to mention harm to human beings, may occur and the EAP has not mentioned anything about this in the draft Scoping Report, an egregious error that should be rectified in the EIA and again, necessitates a strategic environmental assessment in order to understand the full effects of this operation on the people and the environment of Namibia.
I find it EXTREMELY concerning that there is absolutely no mention of or investigation into the effects of seismic testing on shallow water wells in the region. Hundreds of small communities line the roads that ReconAfrica wants to shoot seismic lines on with huge Adjusted Drop Weight method "thumper" trucks. There should be a full study of the effect of these seismic testing trucks on shallow water wells next to the roads used by the survey. According to the Canadian province of New Brunswick's Conservation Council, seismic testing can damage the wells people get their drinking water from, and has led to the loss of water in at least 60 homes there. They say that only by doing baseline (before-seismic) water testing at every well location, then doing it after the seismic testing can any possible damage or pollution from the activity be understood. There does not appear to be any plan to do any baseline water tests at all and no possible impacts of the testing on water wells appear to be considered.
It seems highly improbable that people in the region could possibly make an informed decision about what ReconAfrica is calling "the largest oil discovery of the decade" without a multi-year engagement process that examines this project as a whole. I hope you consider these points carefully, as overlooking them may prove catastrophic.
Sincerely,
Anja du Plessis

12.	From: Kirsten du Preez <kirsten.dupreez@gmail.com> Sent: Tuesday, 2 February 2021 11:54 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Kirsten du Preez
13.	From: Cathy Allen <cathyallen65@outlook.com> Sent: Tuesday, 2 February 2021 8:54 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
14.	**From:** 222327@soas.ac.uk <222327@soas.ac.uk> **Sent:** Monday, 1 February 2021 4:56 PM **To:** smwiya@rbs.com.na; smwiya@rbs.com.na **Cc:** N King <nking@gecko-net.com> **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to **specialist studies** on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Melissa de Kock Student no. 222327 Email: 222327@soas.ac.uk mobile number +27825539966 SOAS, University of London Department of Development Studies

	MPhil/PhD in Development, Environment and Policy (PT)
15.	**From:** Stefanie Zimmermann <ingomar.steffi@gmx.de> **Sent:** Sunday, 31 January 2021 2:27 PM **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** frontdesk@rbs.com.na Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
16.	From: Nelde <neldeusa@aol.com> Sent: Sunday, 31 January 2021 2:22 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Norbert Nelde
17.	**From:** debbie <debbie@burchells.co.za> **Sent:** Sunday, 31 January 2021 5:19 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
18.	**From:** Pato Kelesitse <pkloveisart@gmail.com> **Sent:** Saturday, 30 January 2021 12:36 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,

	Sent from Mail for Windows 10
19.	From: Hannah Dean-Wood <hdeanwood@gmail.com> Sent: Saturday, 30 January 2021 2:24 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, -Hannah Dean-Wood Sent from my iPhone=
20.	**From:** Sharon Eckman <sharoneck.se@gmail.com> **Sent:** Friday, 5 February 2021 6:15 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr Sindila Mwiya Please see below for my concerns regarding the initial 2D seismic surveying: 1. From what I have read and also seen on photographs, it is unclear whether the drill pit close to Kawe was lined properly - this despite assurances that it had been. The drill pit is in close proximity to the village and if it has not been properly lined, will potentially have a serious impact on Kawe - fracking drills go deep into the ground and can release toxic material when doing so. 2. Were the local communities properly consulted? This seems unclear both from what I have read and watched online (public meeting of concern) and it appeared to me that they were not and also that there concerns were not taken that seriously. In addition, there was a cancellation of a community meeting - can you explain this? 3. What is being done to reduce the risk to damage of local buildings when the seismic surveying is carried out? 4. What happens if oil is found following the initial surveying? Conservation is enshrined in the Namibian constitution, and the government has always said it would oppose fracking. How is this even being allowed? Namibia is renowned for its pristine environment and indeed environmental protection for its diversity of flora and fauna. The Kavango is home to endangered animals such as wild dogs and pangolins - and pangolins are already the most traffiked animals on earth. 5. We are in a climate emergency. What possible justification can there be for trying to access more fossil fuels? Solar power is a much more sustainable and obvious option for Namibia apart from anything else. ReconAfrica's project is retrograde, reactionary and undoubtedly not in the best interest of the country and indeed the planet. Best wishes Sharon Eckman Additional information: Full name: Sharon Frances Eckman

	Contact number: +(00)44 7855975213 Organisation represented: Concerned member of the public **From:** Sharon Eckman <sharoneck.se@gmail.com> **Sent:** Friday, 29 January 2021 8:09 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
21.	From: Sean Brown <sean@safcei.org.za> Sent: Friday, 29 January 2021 11:57 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
22.	From: Okavango Delta <savetheokavango@gmail.com> Sent: Friday, 29 January 2021 11:45 PM To: Sindila Mwiya <smwiya@rbs.com.na>; Dr Sindila MWIYA <frontdesk@rbs.com.na>; Teofilus.Nghitila@met.gov.na Cc: savetheokavango@gmail.com; josephineamwaalwa@gmail.com; veruschka0107@gmail.com Subject: Registered stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73 Dear Dr Mwiya and Commissioner Nghitila As a registered IAP, Frack Free Namibia & Botswana hereby wishes to submit our objection to the planned seismic survey by Recon Africa. Ms Verushka Dumeni (mobile number 0814680571) and Ms Josephine Amwaalwa (0816682995) are our contact persons. Kind regards Frack Free Namibia & Botswana

23.	**From:** Johan M. Edholm <edholm1988@gmail.com> **Sent:** Friday, 29 January 2021 10:27 PM **To:** smwiya@rbs.com.na **Subject:** Environmental impact assessment Hello! I would like to register for the impact assessment on seismic survey operations in the Kavango. Kind greetings, Johan
24.	**From:** Enya Munting <enya.firefly@gmail.com> **Sent:** Friday, 29 January 2021 9:51 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Registration as an Interested and Affected Party for Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance Best Wishes Enya Munting
25.	**From:** Tara <taradejongh18@gmail.com> **Sent:** Friday, 29 January 2021 9:42 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Register for Environmental impact assessment To the concerned party, I want to register for the environmental impact assessment on seismic survey operations in the Kavango. I do not agree with exploration nor any seismic surveying, which would disrupt behavioural patterns in Elephants or animal sensitive to this type of exploration. Tara de Jongh

26.	**From:** Silke Ahrens <silkeahrens@hotmail.com> **Sent:** Friday, 29 January 2021 8:57 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** IAP Registration; Submission of Objection to the proposed application for ECC, ReconAfrica-related activities in KavangoBasin and affected areas Dear Dr Mwiya and Team of RBS, please find attached my submission of : The request of IAP registration on this topic The submission of my questions and request for further research in the matter of all current ECCs, drafted applications of PEL No 73, Kavango Bason The submission of my concerns re 2D Seismic Survey process and exploratory drilling and all related activities as stated in the first submitted report of Dr Mweya and RBS on this matter. Thank you very much for your kind attention. Silke Ahrens Windhoek Namibia Contributor: Silke Ahrens Tel: 061 244 295 Mail: silkeahrens@hotmail.com Submitted: 29 Jan 2021 At smwiya@rbs.com.na At frontdesk@rbs.com.na Written submission to the EIA Public consultation process regarding the currently issued ECC as defined here and referenced below AS WELL AS written submission valid for the 2nd phase assessment, after drilling, in case there are positive results and submission for types of exploration would start. This also serves as contribution to the public participation process for a 2nd EIA pertaining to 2D Seismic survey linked to ReconAfrica's exploratory drilling. It also serves as my current contribution to the to be logged application for EIS Friday 05th Feb 2021, as declared by RBS Team. Guidance for the submission is amongst others, this EIA report: Final Environmental Impact Assessment Report Vol 2 of 3 to support the application for Environmental Clearance Certificate (ECC) for the proposed petroleum and Gas exploration operations (Drilling of multiple Stratigraphic Wells) in the petroleum exploration License (PEL) No 73, covering Blocks 1719, 1720in 1721, 1819, 1820 and 1821, Kavango Basin, Kavango West and East Regions, Northern Namibia Dear Dr Mwiya, I would like to register as an interested and affected party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all document of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment being used and the contact of the scientists who have carried out the specialist studies. The concern of the matter is the overall impact of seismic testing, exploratory drilling, oil exploration; lack of clarity on fracking plans or supposed plans under which term, definition or description they might be stated or implied. Public engagement including various scientists and experts is important. The legal framework of Namibia has made provision for public involvement in this process and private persons can have a voice in the quest for preservation of persons, animals, livelihoods, water resources, air resources; tourism income source and conservancy management. Ecocide is a term under discussion and it is a sign of the times that the protection of Earth and what is beans has to have its place in considerations this process. Reviews need to consider plans of ReconAfrica in case there are successful drilling results. Multiple countries ad multiple communities; cross-border impact. This is a concern in terms of stakeholder engagements. How are citizens educated and informed of the impact of the project: by whom, in which way and language. Who choses the Contribution to the EIA Process RBS, ReconAfrica, Silke Ahrens| 1 | Page
27.	**From:** Mark Boorman <felix@afol.com.na> **Sent:** Friday, 29 January 2021 6:56 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Regards, Mark Boorman

28.	From: Dr Lueesse <doc.lueesse@icloud.com> Sent: Friday, 29 January 2021 6:32 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Dr Hans Gerd Lüesse Life begins outside your comfort zone +264 811247508=
29.	From: David Cartwright <lottiebond@me.com> Sent: Friday, 29 January 2021 4:50 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Cc: Bond Charlotte <charlotte@ati-holidays.com> Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
30.	**From:** Louis Lambrechts <louis@naturaljustice.org> **Sent:** Monday, 8 March 2021 11:22 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Melissa Groenink <melissa@naturaljustice.org> **Subject:** RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya, I trust you are well. From now on, could you please refer to Melissa Groenink (melissa@naturaljustice.org) as your point of contact from Natural Justice (registered stakeholder) on matters related to the ReconAfrica exploration in the Okavango and the EIA process, and provide her with all future related documents. Many thanks, Best regards, Louis Lambrechts

	From: Louis Lambrechts <louis@naturaljustice.org> **Sent:** Friday, 12 February 2021 5:43 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Melissa Groenink <melissa@naturaljustice.org> **Subject:** ReconAfrica's 2D Seismic Surveys Draft Scoping Report - Comments Dear Dr. Mwiya, Natural Justice, as a registered I&AP, hereby submits the comments on the draft scoping report for ReconAfrica's 2D seismic surveys found in the document here attached. Please confirm receipt hereof. Natural Justice is working directly with several communities living within or near the licensed area in both Namibia and Botswana. We ask for these comments to be carefully considered and answered for in the final scoping report. Sincerely, Louis Lambrechts **From:** Louis Lambrechts <louis@naturaljustice.org> **Sent:** Friday, 29 January 2021 4:02 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr Mwiya, As requested, please find the required details below: Louis LAMBRECHTS +32499734586 Natural Justice Melissa GROENINK +27846027050 Natural Justice Best regards, Louis Lambrechts NATURAL JUSTICE To the attention of: Dr Sindila Mwiya Environmental Assessment Practitioner Risk Based Solutions (RBS) CC frontdesk@rbs.com.na From: Natural Justice louis@naturaljustice.org and/or melissa@naturaljustice.org Comments on the Draft Environmental Scoping Report to Support the Application for Environmental Clearance Certificate (ECC) for the Proposed 2D Seismic Survey covering the Area of Interest (AOI) in Petroleum Exploration License (PEL) No. 73, Kavango Basin, Kavango West and East Regions, Northern Namibia. About Natural Justice: Natural Justice: Lawyers for Communities and the Environment is a non-profit organisation specialising in environmental and human rights law in Africa – with a focus on the pursuit of social and environmental justice for local and indigenous communities. Natural Justice offers direct support to local and indigenous communities impacted by the ever-increasing demand for land and resources, through legal empowerment. Natural Justice also conducts comprehensive research on environmental and human rights laws, as well as engaging in key national and international processes with, for and alongside indigenous peoples and local communities. Natural Justice is working directly with several communities living within or near the licensed area in both Namibia and Botswana. By virtue of sec. 23 of the EIA Regulations, Natural Justice, a registered I&AP, submits the following comments: consideration and response by the Environmental Assessment Practitioner ("EAP") and submission to the relevant competent authorities as per sec. 7(1) and 7(2) of the EIA Regulations. Please confirm receipt hereof. 1. Failure to perform the work relating to the application in an objective manner. By virtue of Sec. 4(b) of the EIA Regulations, the EAP is bound to perform the work relating to the application in an objective manner. The report includes no statement of impartiality. In the statement of qualifications of the environmental assessment practitioner, it is stated that Dr Sindila Mwiya is "fully aware of all the competing interests [in energy companies] and niche
31.	**From:** Timoteus Mufeti <Timoteus.Mufeti@meft.gov.na> **Sent:** Wednesday, 10 February 2021 3:14 PM **To:** Oliver Freyer <olifreyer@outlook.com> **Cc:** frontdesk@rbs.com.na **Subject:** Re: ReconAfrica's Seismic EIA Scoping Report Dear Oliver, This is an acknowledgement of receipt of your message and submission. Please make sure that this is received by the proponent as well. Mufeti

	From: Oliver Freyer <olifreyer@outlook.com> **Date:** Wednesday, 10 February 2021 at 15:05 **To:** Timoteus Mufeti <Timoteus.Mufeti@meft.gov.na> **Cc:** "frontdesk@rbs.com.na" <frontdesk@rbs.com.na> **Subject:** Re: ReconAfrica's Seismic EIA Scoping Report Dear Mr. Mufeti I would kindly like to inquire whether you have received my submitted concerns as an I&AP of the proposed seismic survey by ReconAfrica on the 29th January. I am attaching the letter to this email again and would appreciate an acknowledgement of receipt. Many thanks and kind regards, Oliver Freyer **From:** Oliver Freyer <olifreyer@outlook.com> **Sent:** Monday, 1 February 2021 3:40 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya Thank you very much for the Scoping Report and for registering me as an I&AP. My full name is Oliver Freyer, cellphone number 0814214092, and I represent myself. Other than being concerned about the social and environmental consequences of the project, I am also interested in following this EIA process as I am an aspiring environmental practitioner myself. Regards, Oliver Freyer **From:** Oliver Freyer <olifreyer@outlook.com> **Sent:** Saturday, 30 January 2021 12:32 AM **To:** frontdesk@rbs.com.na; Timoteus.Mufeti@met.gov.na **Subject:** ReconAfrica's Seismic EIA Scoping Report Dear Mr. Mufeti, Dear Dr. Mwiya

	Re: ReconAfrica's Seismic EIA Scoping Report As a registered Interested and Affected Party for the proposed seismic survey operations conducted in PEL 73 in northeastern Namibia, I would formally like to submit my concerns in the attached letter. It would be much appreciated if you consider them. I kindly ask for an acknowledgement of receipt. Sincerely, Oliver Freyer **From:** Oliver Freyer <olifreyer@outlook.com> **Sent:** Friday, 29 January 2021 3:45 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** I&AP registration for seismic survey operations Dear Dr Mwiya As a Namibian citizen, environmental science graduate and current sustainable development Masters student, I would herewith like to register as an Interested and Affected Party (I&AP) for the Environmental Impact Assessment (EIA) conducted by Risk-Based Solutions (RBS) CC on the proposed seismic survey operations in Petroleum Exploration License (PEL) No. 73 by Reconnaissance Energy Namibia (Pty) Ltd. I would like to be kept informed as an I&AP and receive all documents of any kind concerning this activity, including but not limited to a Non-Technical Summary/Background Information Document (BID), specialist studies on seismic testing in the area, maps of proposed and potential survey locations, an outline of the equipment to be used, contact details of the scientists who are conducting the specialist studies, as well as the scoping report, Environmental Management Plan and EIA. Many thanks and kind regards, Oliver Freyer Mr. Oliver Freyer P.O. Box 9869 Windhoek Mr. Timoteus Mufeti Environmental Commissioner Ministry of Environment and Tourism Private Bag 13306 Windhoek 29. January 2021 Dear Mr. Mufeti Dear Dr. Mwiya **Re: ReconAfrica's Seismic EIA Scoping Report** I have registered as an Interested and Affected Party (I&AP) for the Environmental Impact Assessment (EIA) conducted by Risk-Based Solutions (RBS) CC on the behalf of Reconnaissance Energy Namibia (Pty) Ltd (under ReconAfrica), regarding the seismic survey operations in Petroleum Exploration License (PEL) No. 73 in the Kavango East and -West regions of Namibia. This letter is to formally register my concerns about how the EIA process is conducted, as well as the potential impacts of the proposed activities if the application for an Environmental Clearance Certificate (ECC) would be approved. I would like to point out, that: 1) Considering the scope of what ReconAfrica claims to be a "major onshore oil discovery", the current method of applying for individual ECC's for each phase of the project is not enough. I am afraid that, by using a step-by-step approach, the overall negative impact on people and biodiversity is not recognised. In my opinion, a Strategic Environmental Impact Assessment (SEA) is needed, covering the entire lifespan of the project. 2) The current limits to travelling and gathering in groups, due to COVID-19, is reducing the amount of citizen participation. This is exacerbated by the fact that people are not enabled to participate in public consultations for the proposed activities. I suggest postponing the application until after the pandemic has ended in order to allow a fair chance of affected people to be heard. 3) While ReconAfrica claims to use existing road through the wilderness, it will be inevitable to widen them, cutting down a considerable number of trees along a 450 km distance. What effect does this have on bird species, on erosion close to watercourses
32.	**From:** Alta De Vos <alta.devos@gmail.com> **Sent:** Friday, 29 January 2021 3:25 PM **To:** frontdesk@rbs.com.na **Subject:** Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya, I would like to register as a stakeholder and affected party for the proposed 2D Seismic Survey Over AOI in PEL 73. My details are as follows **Full names:** Aletta De Vos **Mobile Phone Number:** +27826913278 **Organisation Representing:** Personal Capacity

	With thanks, Alta De Vos
33.	**From:** Geoff Davies <geoff.davies@safcei.org.za> **Sent:** Friday, 29 January 2021 3:24 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Thank you for confirming my registration as a stakeholder. My full name is: Geoffrey Francis Davies. My mobile number: +27837545275 My organization is: the Southern African Faith Communities' Environment Institute (SAFCEI) I write in principle from the perspective of the natural environment and our responsibility to care for it. In particular I write as a bishop in the global Anglican communion. We know that we have been commanded by God to look after, care for and protect this incredible creation of life on this planet. We write to object in principle to Exploration on environmental grounds, knowing that we are answerable to God. First, on local environmental grounds. The whole of the Okavango Area is uniquely valuable and sacred in its geological formations, its wildlife and the habitat which is provided for the people of that region. There are few wilderness areas remaining in the world. Once damaged, they are gone for ever. We have to look to the heritage we leave to our children and not base our decisions on money that can be made now. Secondly, on global grounds, we know that climate change is threatening the well-being of future life on this planet. To counter global warming, we know we have to stop burning fossil fuels, whether it be oil, gas or coal. It is therefore highly irresponsible to even explore for further fossil fuel resources. All financial resources should be directed to developing renewable energy. Spending financial resources on exploration for fossil fuel is sheer irresponsibility. Pope Francis, The ecumenical patriarch of the Orthodox church and most mainline Christian churches including the Lutheran Church have declared that to destroy the natural environment and God's creation is a sin. We therefore call upon ReconAfrica to cease this activity, which is clearly sinful, forthwith. Bishop Geoffrey Davies Sent from my iPhone Geoff Davies The Green Bishop SAFCEI
34.	From: Zach Abraham <zabraham@wwfint.org> Sent: Friday, 29 January 2021 3:23 PM

To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com
Subject: Interested Party for 2-D Seismic Survey EIA

Dear Dr Mwiya,

I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies.

Thank you so much for your kind assistance,

Zach

35.

From: nndfn@africaonline.com.na <nndfn@africaonline.com.na>
Sent: Friday, 29 January 2021 3:23 PM
To: timoteus.mufeti@met.gov.na; frontdesk@rbs.com.na
Cc: Ben Begbie-Clench <benbegbie@gmail.com>
Subject: ReconAfrica's Seismic EIA Scoping - Letter NNDFN

Please find attached letter for your consideration.

With best wishes,

Saskia Sheehama
Director NNDFN

timoteus.mufeti@met.gov.na
frontdesk@rbs.com.na

29 January 2021

Dear Mr. Mufeti and Dr. Mwiya,

RE: ReconAfrica's Seismic EIA Scoping

We have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia.

This letter serves to register concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. We are concerned that:

1) Consultations with community members, specifically members of the San communities in the area, who are in part extended members of communities found in the Nyae Nyae and N!a Jaqna Conservancies that we support, appear to be limited in inclusion and scope. As you'll appreciate, the most marginalised communities in any area are likely to have limited inclusion and benefits.

2) We would like clarity on whether there is a possibility of site access through Kanovlei in N!a Jaqna Conservancy, which would bring environmental and social impacts to the Conservancy.

3) Given the "resource curse" economics widely acknowledged with oil producing countries, any potential benefits of the project for communities should be clearly defined AND potential negative impacts clearly illustrated, rather than more generic promises of "jobs and development" that seem to have been presented to communities thus far.

4) Limitations of the COVID-19 pandemic to safe and accessible consultations on this important matter.

We look forward to addressing these issues in more detail at a later date.

Yours sincerely,

Saskia Sheehama
Director NNDFN

Registered Interested and Affected Party
Name: Nyae Nyae Development Foundation Namibia (NNDFN)
Address: PO Box 9026, Eros, Windhoek, Namibia
Phone number: + 264 (0)61 236 327 / nndfn@iafrica.com.na

From: nndfn@africaonline.com.na <nndfn@africaonline.com.na>
Sent: Friday, 29 January 2021 3:10 PM
To: frontdesk@rbs.com.na
Cc: smwiya@rbs.com.na; Ben Begbie-Clench <benbegbie@gmail.com>
Subject: FW: FW: Public Meetings in Windhoek - ReconAfrica oil and gas exploration in Kavango Regions
Importance: High

Dear Dr Sindile Mwiya,

The Nyae Nyae Development Foundation Namibia (NNDFN) would like to make a request to be an interested and affected party for the ReconAfrica EIA on seismic testing.

Email contact: nndfn@iafrica.com.na
Phone: + 264 (0)61 236 327

Many thanks.

Yours sincerely,

Saskia Sheehama

	Director NNDFN
36.	From: Lee Buchsbaum <leebu2014@gmail.com> Sent: Friday, 29 January 2021 1:16 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
37.	**From:** Jessica Lavelle <jessicajanelavelle@gmail.com> **Sent:** Friday, 29 January 2021 2:50 PM **To:** Teofilus.Nghitila@met.gov.na; frontdesk@rbs.com.na **Subject:** ReconAfrica's Seismic EIA Scoping Report Dear Mr. Mufeti and Dr. Mwiya, I have registered as an Interested and Affected Party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. With this letter I would like to formally register concerns regarding the application for an Environmental Clearance Certificate to conduct seismic testing and request an acknowledgement of receipt of this letter. The nature of my concerns are as follows: 1) **Inadequate and exclusionary consultation processes** due to COVID-19 placing severe restrictions on stakeholder meetings and travel; an unwillingness of the Environmental Assessment Practitioner to live-stream public consultations for people to attend safely; and the use of online submissions only for the registration of Interested and Affected Parties. This, despite the communities most affected by ReconAfrica's proposed seismic activities not having access to electricity or internet. There are more than six hundred communal farms and many more communities where there is no internet access at all inside the license area. **This exclusion is in breach of the communities' legally mandated right of full disclosure of the impact of such activities on their lives and livelihoods and their right to raise concerns regarding such impacts.** I request that the application of an ECC is put on hold until comprehensive consultations can take place. 2) The Scoping Report provides **insufficient data regarding the impact on high-value trees** including Zambezi teak and rosewood as a result of road widening. Table 3.2 (pg 80) of the scoping report says that, "No removal of protected species or mature trees are anticipated because the activity will require widening the existing tracks as may be applicable." This is a contradictory statement as road widening does require the removal of trees and not anticipating removal does not qualify as a commitment to protecting high-value trees and associated species including insects and birds. The photo of Line EW5 on Plate 1.24 (pg 37) of the Scoping Report indicates that trees will be removed to accommodate the widening of roads. Further, **long-term implications of increased road networks have not been adequately addressed** in the Scoping Report including increased poaching and illegal harvesting of plants. I request that this ECC is put on hold until proper scientific studies on these impacts can be done. 3) Globally there is a call for the phasing out of fossil fuels due to their detrimental effect on the environment and their contribution to Anthropogenic climate change. Namibia is blessed with immense solar energy that is more than sufficient to fulfill the population's energy requirements. Not only is solar energy infrastructure faster and cheaper to install (approximately

five months), it is cheaper to maintain and has minimal effect on the environment. **According to the Act, alternative energy systems must be explored in the EIA, which has not been done**, either in this Scoping Report or the first one for the exploration drilling, a major error on the part of the EAP.

I trust you will take my concerns into serious consideration. A project of this scale is not to be undertaken without the necessary due diligence. Recent events in the Juukan Gorge, Australia by Rio Tinto have explicitly shown that mining companies do not obtain Free, Prior and Informed Consent, do not adequately address the concerns of local communities and there is a dire need to improve governance processes to include indigenous peoples and local communities in authoritative decision-making processes. I sincerely hope that the issues I have raised are taken into account with the correct engagement, science and outreach at a time that enables all affected parties to participate without the threat of COVID-19.

It seems improbable that people in the region could possibly make an informed decision about what ReconAfrica is calling "the largest oil discovery of the decade" without a multi-year engagement process that examines this project as whole: a massive oil and gas development that needs to be carefully looked at before any other environmental clearance is issued.

Regards,
Jessica Lavelle
Registered Interested and Affected Party

Address: Kob Cottage, 12 Harris Road, Kalk Bay, South Africa, 7975
Phone number (if known): +27 72 198 8687
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Jessica-Jane Lavelle
Postdoctoral Research Fellow
DSI/NRF SARChI: Environmental and Social Dimensions of the Bio-economy
Department of Environmental and Geographical Science
University of Cape Town
Cape Town (//Hui !Gaeb)
+27 (0) 72 198 8687
jessicajanelavelle@gmail.com
www.bio-economy.org.za
www.voices4biojustice.org

From: Jessica Lavelle <jessicajanelavelle@gmail.com>
Sent: Friday, 29 January 2021 1:07 PM
To: smwiya@rbs.com.na; frontdesk@rbs.com.na
Cc: savetheokavangodelta@gmail.com
Subject: Interested Party for 2-D Seismic Survey EIA

Dear Dr Mwiya,

I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies.

Thank you so much for your kind assistance,
Jessica Lavelle
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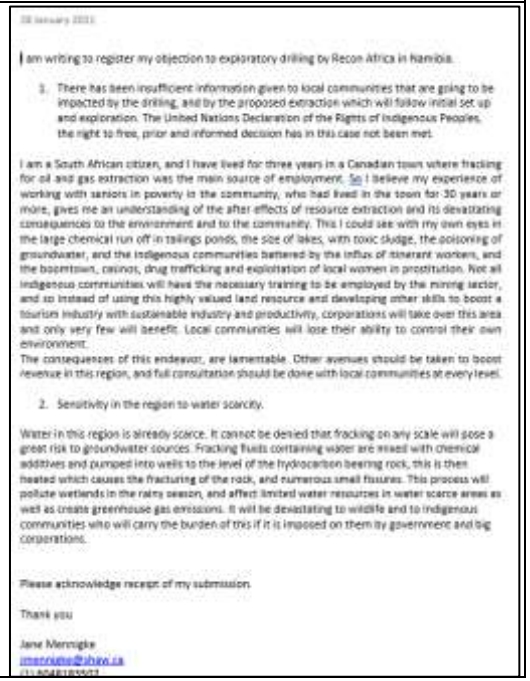
Jessica-Jane Lavelle

	Postdoctoral Research Fellow DSI/NRF SARChI: Environmental and Social Dimensions of the Bio-economy Department of Environmental and Geographical Science University of Cape Town Cape Town (//Hui !Gaeb) +27 (0) 72 198 8687 jessicajanelavelle@gmail.com www.bio-economy.org.za www.voices4biojustice.org
38.	**From:** S S <sueshe@hotmail.co.za> **Sent:** Friday, 29 January 2021 11:52 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
39.	**From:** witvrouwen christa <christa.witvrouwen@hotmail.be> **Sent:** Friday, 29 January 2021 10:17 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies.
40.	From: ama gaoses <ama.gaoses@gmail.com> Sent: Friday, 29 January 2021 10:02 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Ama Gaoses

41.	**From:** Rachael Harlech-Jones <rachael@visitnamibia.net> **Sent:** Thursday, 4 February 2021 10:57 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; 'Sindila Mwiya' <smwiya@rbs.com.na> **Cc:** Teofilus.Nghitila@met.gov.na **Subject:** RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr Sindila Mwiya Below are my concerns about the initial 2D seismic surveying: 1. There seems to be mixed reports about whether the drill pit close to Kawe was properly lined. Considering its proximity to the village, this is extremely worrying especially considering the depths that the drill is going and the possibl radioactive material that may be accessed. 2. I appreciate that the seismic surveying proposed is using more environmentally senstive equipment but this does not seem to negate the danger of contamination through unforseen ground movement. Creating local boreholes does not seem to tackle the more concerning long-term effects. 3. There seem to be mixed reports regarding the involvement of the local communities in the exploration region. For instance the cancellation of the Mbambi community meeting. 4. The seismic surveying may damage local buildings. What is being done to reduce this risk and if damage does occur, are adequate measures in place to properly compensate those affected? However, for me, and I believe most people who are opposing this project, the real issue is not the initial seismic surveying but the end game if oil is discovered. Cutting the process up into more palatable sections does not diminish this concern. Repeatedly saying that this is only an exploratory stage does not remove this fact. Namibia is one of the few places on earth that has not been trashed by human development and is a sanctuary to a great diversity of wildlife and flora. The fact that the Kavango is home to endangered animals such as wild dogs and pangolins is just one of many reasons this project should not go ahead. On top of this, the idea that we should be embracing the development of fossil fuels when solar is clearly a much more sustainable option in Namibia, makes ReconAfrica's project entirely unacceptable. regards Rachael Additional info requested: Full name: Rachael Katherine Harlech-Jones Contact Numbers: +264 (0)61 225345 / +264 81 3171304 Organisation that you are representing: Member of the public **From:** Rachael Harlech-Jones <rachael@visitnamibia.net> **Sent:** Friday, 29 January 2021 11:36 AM **To:** Teofilus.Nghitila@met.gov.na **Cc:** frontdesk@rbs.com.na **Subject:** ReconAfrica's Seismic EIA Scoping Report Dear Mr. Mufeti (Environmental Commissioner) and Dr. Mwiya (Environmental Assessment Practitioner) I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. This is a letter to formally register very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I am concerned about numerous conservation factors connected to this project. However, a more immediate concern is the fact that today, 29 Jan 2021, is the final date for the public to register their comments/objections and yet ReconAfrica have arranged meetings through NCE for 2 Feb. How do these meetings have any validity if they are being held after the EIA application cut-

	off date? It makes a mockery of the entire process. regards Rachael Harlech-Jones **From:** Rachael Harlech-Jones <rachael@visitnamibia.net> **Sent:** Friday, 29 January 2021 9:25 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr. Mwiya I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Rachael Harlech-Jones
42.	**From:** Nadine Kohlstaedt <info@scientificsocietyswakopmund.com> **Sent:** Friday, 29 January 2021 8:56 AM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na **Subject:** Petroleum Exploration in Namibia Dear Sir/Madam, I would like to register as interested and affected person for the above mentioned project. Furthermore, I would like to express my deep concern about the activities that will negatively affect wild life in the area. Maybe not so much the surveying, but the possible extraction, if viable amounts of oil are found. The tracks of your survey do not seem to follow existing tracks, contrary wot what is mentioned in the advert. I am concerned if your words do not match the actions in this instance, how it will be in others. Yours sincerely, N. Kohlstaedt Nadine E. Kohlstaedt, info@scientificsocietyswakopmund.com; Tel: 064-402 695; private capacity
43.	**From:** Stephanie <steph@feathagrafix.com> **Sent:** Friday, 29 January 2021 8:15 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya,

	I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Best regards Stephanie Faul
44.	**From:** kreidsa@gmail.com <kreidsa@gmail.com> **Sent:** Friday, 29 January 2021 7:26 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Save the Okavango Delta **Importance:** High I wish to register as an interested/affected party to receive all official updates and specialty assessments from scientists surveying the drilling project in the Okavango region. Thank you Karen Reid
45.	**From:** Jane Mennigke <jmennigke@shaw.ca> **Sent:** Friday, 29 January 2021 10:18 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** I am writing to register my objection to exploratory drilling by Recon Africa in Namibia.docx **From:** Jane Mennigke <jmennigke@shaw.ca> **Sent:** Friday, 29 January 2021 12:17 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Registration as an IAP Dear Dr Mwiya, I would like to register as an interested and affected party for the ReconAfrica Seismic Testing EIA. My email address is jmennigke@shaw.ca My phone number is (1) 604-818-3507 I look forward to confirmation of my registration. Yours sincerely Jane Mennigke  I am writing to register my objection to exploratory drilling by Recon Africa in Namibia. 1. There has been insufficient information given to local communities that are going to be impacted by the drilling, and by the proposed extraction which will follow initial set up and exploration. The United Nations Declaration of the Rights of Indigenous Peoples, the right to free, prior and informed decision has in this case not been met. I am a South African citizen, and I have lived for three years in a Canadian town where fracking for oil and gas extraction was the main source of employment. So I believe my experience of working with seniors in poverty in the community, who had lived in the town for 30 years or more, gives me an understanding of the after effects of resource extraction and its devastating consequences to the environment and to the community. This I could see with my own eyes in the large chemical run off in tailings ponds, the size of lakes, with toxic sludge, the poisoning of groundwater, and the indigenous communities battered by the influx of itinerant workers, and the boomtown, casinos, drug trafficking and exploitation of local women in prostitution. Not all indigenous communities will have the necessary training to be employed by the mining sector, and so instead of using this highly valued land resource and developing other skills to boost a tourism industry with sustainable industry and productivity, corporations will take over this area and only very few will benefit. Local communities will lose their ability to control their own environment. The consequences of this endeavor, are lamentable. Other avenues should be taken to boost revenue in this region, and full consultation should be done with local communities at every level. 2. Sensitivity in the region to water scarcity. Water in this region is already scarce. It cannot be denied that fracking on any scale will pose a great risk to groundwater sources. Fracking fluids containing water are mixed with chemical additives and pumped into wells to the level of the hydrocarbon bearing rock, this is then heated which causes the fracturing of the rock, and numerous small fissures. This process will pollute wetlands in the rainy season, and affect limited water resources in water scarce areas as well as create greenhouse gas emissions. It will be devastating to wildlife and to indigenous communities who will carry the burden of this if it is imposed on them by government and big corporations. Please acknowledge receipt of my submission. Thank you Jane Mennigke jmennigke@shaw.ca

46.	**From:** Medwin Swartbooi <medwinswartbooi@gmail.com> **Sent:** Thursday, 28 January 2021 6:30 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
47.	**From:** First People Southern Africa FPSA remote assistance <indigiyouthexchange@gmail.com> **Sent:** Monday, 25 January 2021 9:35 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; Okavango Delta <savetheokavango@gmail.com> **Subject:** Registration as an interested/affected party Good day Dr Mwiya First People Southern Africa (2020/568411/08) Non-profit Organisation who is currently working hand in hand with Frack Free Namibia and Botswana in the form of an Environmental-Indigenous walk to raise awareness for the San homelands that will be affected by this project would kindly like to register as an interested/affected party in order to receive all official updates from the drilling project in the Okavango Region. Please advise if you require any additional information Thank you Kind regards Sharri Cannell **Email**: indigiyouthexchange@gmail.com **Cell**: 082 578 9834 **Social Media:** Instagram - @iyxafrica Facebook - @iyxafrica7 - @firstpeoplesouthernafrica
48.	**From:** Carla Saayman <carlasaay@gmail.com> **Sent:** Thursday, 28 January 2021 1:26 PM **To:** frontdesk@rbs.com.na **Subject:** Register as I&AP for Kavango oil and gas project Good day I would hereby like to register as an interested and affected party for the 'Gas and oil exploration project in the Kavango Regions'. Please add me to the list for ongoing information sharing and review processes.

	Kind regards, Carla Saayman 081-337-1166 carlasaay@gmail.com
49.	**From:** du Plessis Nicolaas <PlessisN@namwater.com.na> **Sent:** Thursday, 28 January 2021 12:12 PM **To:** Claire Preece <claire.preece@ReconAfrica.com>; Dr Sindila MWIYA <frontdesk@rbs.com.na>; Yuri Perez <yuri.perez@ReconAfrica.com> **Cc:** Kamburona Jolanda <KamburonaJ@namwater.com.na>; shakwa@shakwanyambeinc.com; Aupokolo Fillemon <AupokoloF@namwater.com.na>; Saima.Angula@met.gov.na; damian.nchindo@met.gov.na; smwiya@rbs.com.na; 'npdupl@gmail.com' <npdupl@gmail.com> **Subject:** RE: *EXTERNAL*Kavango Basin - Environmental Reports (Scoping, EIA and EMP) Good day Your prompt response is much appreciated. We will peruse the attached documentation and then liaise with you. Kind regards NP du Plessis **From:** Claire Preece <claire.preece@ReconAfrica.com> **Sent:** Thursday, 28 January 2021 11:59 **To:** du Plessis Nicolaas <PlessisN@namwater.com.na>; Dr Sindila MWIYA <frontdesk@rbs.com.na>; Yuri Perez <yuri.perez@ReconAfrica.com> **Cc:** Kamburona Jolanda <KamburonaJ@namwater.com.na>; shakwa@shakwanyambeinc.com; Aupokolo Fillemon <AupokoloF@namwater.com.na>; Saima.Angula@met.gov.na; damian.nchindo@met.gov.na; smwiya@rbs.com.na; 'npdupl@gmail.com' <npdupl@gmail.com> **Subject:** RE: *EXTERNAL*Kavango Basin - Environmental Reports (Scoping, EIA and EMP) **Importance:** High Good Morning: Thank you for sending your emails to ReconAfrica. I have attached one of the many public notices for the EIA on seismic and the steps that are to be taken. Dr. Sindila is copied on the various emails so please feel free to follow the required protocols and we will work with you and your organisation. If you have any further requests, please send to me, Claire Preece, ReconAfrica's ESG Technical Director and to Dr. Sindila (copied on the email), EIA consulting company and to Shakwa (copied on the email), our legal representative. We appreciate and will follow required approaches and protocols. All information requested that is outside of these required protocols, will follow MEFT requirements and procedures. Please feel free to correspond with the three of us – myself, Dr. Sindila and Shakwa, as much as you would like. Thanks again, Claire Preece ESG and Corporate Communications

50.	**From:** Kate Davies <kate@safcei.org.za> **Sent:** Friday, 29 January 2021 12:33 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 I A P: Katherine Claire Davies Mobile: +27 834681798 Liaison officer SAFCEI Southern African Faith Communities Environment Institute. To whom it may concern: Comments on the proposed seismic survey, leading to fossil fuel extraction in the Kavango basin. There is NO justification for the proposed exploration. We all know that there is a global climate crisis. Any future development and exploration of fossil fuel extraction processes is short sighted and madness in terms of the long term well-being of future generations and survival on the planet. This is the bottom line. This project will have short term financial gains for 'early bird' investors, but will leave late comers with stranded assets and Botswana and Namibia a legacy of broken promises, desolation and destruction for future generations to deal with. The region is one of exceptional and unique beauty and isolation, parts of which have been identified as UNESCO world heritage sites, with enormous and long term ecotourism potential. It is arrogant and outrageous that a Canadian company can even consider undertaking such a project in a natural sanctuary of such global significance. Is there no place that is sacrosanct from human avarice and greed? The promise of job creation is a distraction from the truth. Jobs will be short lived with little long-term benefit In a water scarce subcontinent, to contemplate the extraction of fossil fuels is outrageous. Indigenous peoples and the other than human community of life have adapted to living sustainably in the region over eons. In a few decades this will be destroyed forever. To steal the subterranean water if the Kavango basin for climate changing oil and gas extraction is unethical and outrageous. There is no valid argument for this project to proceed. The Kavango region and her people must be protected from greedy, profit seeking foreign companies. Companies that will take advantage of less resistance from unsuspecting people in Africa than they would get from climate and environmental activists in their own countries. Should this project proceed, there will be a global outcry. Katherine Davies 29 January 2021 **From:** Kate Davies <kate@safcei.org.za> **Sent:** Thursday, 28 January 2021 10:34 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Registration as an I and AP Dear Dr Mwiya,

	I would like to register as an interested and affected party for the ReconAfrica Seismic Testing EIA. My email address is kate@safcei.org.za My phone number is +27 83 4681798 I look forward to confirmation of my registration With good wishes, Kate Davies **Kate Davies** **Liaison and Resources** **t** + 27 21 701 8145 **c** + 27 83 468 1798 kate@safcei.org.za PO Box 106, Kalk Bay, 7990, South Africa **www.safcei.org**
51.	**From:** Glen Tyler-Davies <glen@350.org> **Sent:** Thursday, 28 January 2021 10:00 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, **full names** Glen Tyler-Davies **mobile \telephone numbers** +27 71 645 7946 **Organisation that you are representing** 350Africa.org
52.	**From:** Sandra Steingraber <ssteingraber@ithaca.edu> **Sent:** Thursday, 28 January 2021 7:46 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Request to register as an interested party Dear Dr. Mwiya,

	I am a Ph.D. biologist who studies the health and environmental impacts of hydraulic fracturing. I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. As such, I would like to receive a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. I appreciate your kind assistance. Warm regards, Sandra Steingraber -- Sandra Steingraber, PhD Distinguished Scholar in Residence Department of Environmental Studies and Sciences Ithaca College www.steingraber.com @ssteingraber1
53.	**From:** Nuno José de Castro Carvalho <nunodalegria@gmail.com> **Sent:** Thursday, 28 January 2021 1:03 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
54.	**From:** Douglas Flynn <douglas.flynn@systemiq.earth> **Sent:** Wednesday, 27 January 2021 5:44 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com; Martin R. Stuchtey <martin.stuchtey@systemiq.earth> **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you in advance,

	Douglas Flynn douglas.flynn@systemiq.earth +44 7421 385820 www.systemiq.earth SYSTEMIQ – catalysing good disruptions London | Munich | Jakarta
55.	**From:** Rachel Mackenna <RachelMackenna@eia-international.org> **Sent:** Wednesday, 27 January 2021 2:54 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Cc:** timoteus.mufeti@met.gov.na; Shruti Suresh <ShrutiSuresh@eia-international.org>; Mary Rice <MaryRice@eia-international.org> **Subject:** Request to register as an interested & affected party for ReconAfrica Seismic Testing EIA Dear Dr Mwiya, I am writing today to register the Environmental Investigation Agency UK as an interested and affected party for the ReconAfrica Seismic Testing EIA. My email address is rachelmackenna@eia-international.org I would appreciate a confirmation that we have been registered. Thank you and kind regards, Rachel **Rachel Mackenna** **Wildlife Campaigner** Environmental Investigation Agency, 62-63 Upper Street, London N1 0NY RachelMackenna@eia-international.org Skype: rachelrachelmackenna eia-international.org • Full name: Rachel Mackenna • Telephone: +44 20 7354 7960 • Organisation: Environmental Investigation Agency

56.	**From:** Liz Hosken <liz@gaianet.org> **Sent:** Wednesday, 27 January 2021 1:53 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Request to register as an I and AP Dear Dr Mwiya, I would like to register as an interested and affected party for the ReconAfrica Seismic Testing EIA please. My email address is liz@gaianet.org. And my current phone no is +44 77 68 344 096 I would appreciate a confirmation please. Thank you very much. Best wishes, Liz Hosken	
57.	**From:** chriszanne@sclc.co.za <chriszanne@sclc.co.za> **Sent:** Wednesday, 27 January 2021 12:27 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of Support Centre for Land Change (SCLC). I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Chriszanne Janse van Vuuren Support Centre for Land Change (SCLC)	
58.	From: Piet Theron <piettheron@me.com> Sent: Wednesday, 27 January 2021 11:03 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya,	

	I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
59.	From: Henry Hallward (Mirada Travel Group) <henry.hallward@miradatravelgroup.com> Sent: Wednesday, 27 January 2021 7:30 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Henry Hallward CEO The Safari Guild Letcombe Bowers Farm Wantage OX12 9NG United Kingdom
60.	**From:** Elephanatics <elephanaticsinfo@gmail.com> **Sent:** Wednesday, 27 January 2021 2:17 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Registration for Seismic Survey and EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance. -- The Elephanatics Team ELEPHANATICS: Conservation | Education | Action facebook: facebook.com/elephanatics

	twitter: elephanaticsbc web: elephanatics.org instagram: elephanaticsbc
61.	**From:** Job Morris <jobjfmorris@gmail.com> **Sent:** Tuesday, 26 January 2021 9:00 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
62.	**From:** Jackie King <jackie.king@watermatters.co.za> **Sent:** Tuesday, 26 January 2021 3:45 PM **To:** frontdesk@rbs.com.na **Subject:** Seismic survey of PEL73 Good Day I would like to register as a Stakeholder for the above exploratory work and any further allied work going forward. I am a river scientist, and led the river ecosystem part of the Okavango Transboundary Diagnostic Analysis in 2009/2010. I worked further within the catchment on an advisory basis for several more years, but retired as a consultant in 2019 and have no current links with OKACOM or the Member States. I do write scientific papers on the basin and am co-developer of an ecosystem-social model presently being used in the basin. Thank you Dr Jackie King Owner: Water Matters Honorary Professor, University of the Western Cape 2019 Laureate: Stockholm Water Prize Tel: +27-21-7129559 Mobile: +27-83-3929905
63.	From: Luke Pato <luke.pato@anglicanjoburg.org.za> Sent: Tuesday, 26 January 2021 12:15 PM To: smwiya@rbs.com.na Subject: Emailing: ReconAfrica 1. Rev Timothy Michael Yates . Tel 081 124 4226 representing the Anglican Diocese of Namibia 2. The Rt Rvd Luke Lungile Pato. Tel. 081 127 7158 representing the Anglican Diocese of Namibia
64.	**From:** #FridaysforFuture Windhoek <fridaysforfuturewhk@gmail.com> **Sent:** Monday, 25 January 2021 4:12 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; save the okavango delta <savetheokavangodelta@gmail.com> **Subject:** Interested Party for 2-D Seismic Survey EIA

Dear Dr Mwiya,

I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies.

Bellow are my concerns

- The EIA had incomplete baseline data. The assessment, consisting only of desktop studies without any fieldwork, is not robust enough to justify the proposed drilling.
- Habitat fragmentation: extracting and transporting oil and gas fragments the habitat and cuts across animal migration routes. The project will require new roads that could fragment the habitat affecting wildlife (facilitate poaching, affecting elephants, lions, primates and other high-value species).
- Noise can affect local people and wildlife (elephants, birds, etc.).
- Wildlife loss will affect local people's livelihood: "Biodiversity is a determinant of public health—without these wild animals doing ecosystem services for us, we can't survive." Elephants, for example, fertilize and seed trees with their dung and excavate the ground, opening up water sources for other animals. [Sandra Steingraber].
- The pits to store drilling mud and water described in the assessment are so big that ReconAfrica's plans for its test wells already may include fracking and may not have been fully disclosed to the Namibian government. (ReconAfrica denies that it plans to use fracking during the exploratory phase, and the Namibian government did not respond to questions about potential fracking plans.)
- ReconAfrica's test wells will require large quantities of water. They'll also produce large volumes of "cuttings"—polluted rock removed from the drill hole. ReconAfrica's assessment says the source for the water will be the Omatako River, which flows underground most of the time.
- Details about water needs for the test wells, which should be addressed, are neglected in the EIA. That includes the volumes of water needed, the number of boreholes, where the water will be taken from the Omatako, how the extraction of water could affect nearby water wells or surrounding communities, and the disposal and treatment of wastewater from drilling. The assessment acknowledges, however, that ephemeral rivers are of "special ecological importance in Namibia due to [their] biotic richness, large mammals, high value for human subsistence and tourism."
- There is no certainty that the drilling fluids would be managed and disposed of safely.
- People in the area rely on groundwater for their subsistence. There is no assessment of how the exploratory drilling could affect the local people's access to water.
- ReconAfrica's assessment "does not meet with the standards of comprehensive unbiased and scientific investigation required," said Jan Arkert, a consulting engineering geologist who's based in Uniondale, South Africa, and has worked for decades on drilling-related projects.
- "It is shocking that this EIA was authorized at all," said Avena Jacklin, a former environmental consultant in the mining sector. She confirmed that the assessment didn't include interested and affected parties and "left out key assessments and specialist studies…and has not identified alternatives to fracking," such as solar and wind power. "None of this has been laid out in the EIA."
- [The U.S. Environmental Protection Agency estimates that it takes about 1.5 million gallons of water to frack a single oil and gas well. A water tanker that holds 3,000 gallons would have to make 500 journeys for each well].
- An influx of oil workers into this remote landscape—and the money, roads, alcohol, and pollution they'd bring—would jeopardize the traditional way of life of the San, said Jennifer Hays, a professor of social anthropology at the Arctic University of Norway.

Lack of public participation in the EIA process

- The local people (including some indigenous groups) did not know about it and it is very difficult to get a copy of the EIA report.
- Namibian law provides for a powerful environmental safeguard, which allows any person, organization, or agency to be an active part of the review process for projects such as this by becoming registered as interested and affected parties; the interested parties are then supposed to be informed and consulted as the review proceeds. This legal protection for the environment and communities apparently was not fulfilled during the environmental impact assessment process.
- "People in the area get their water from hand-dug wells and small hand pumps, Arkert said. "What happens if the company drops the groundwater table and people who live there can no longer access the water they have relied upon for generations?"

	Thank you so much for your kind assistance,
65.	**From:** Elise Tempelhoff <eliset@24.com> **Sent:** Monday, 25 January 2021 11:28 AM **To:** save <smwiya@rbs.com.na> **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Please register me as an interested and affected party *Dear Dr Mwiya,* *I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies Thank you so much for your kind assistance,.* *Elise Tempelhoff* *+27 833091192*
66.	**From:** Michael Beiler <michael.beiler@gmail.com> **Sent:** Monday, 25 January 2021 10:32 AM **To:** frontdesk@rbs.com.na **Subject:** Interested Party to Drilling Exploration Okavango Namibia Dear Madam/Sir, kindly register me at this email address as interested party. Sincerely, Dr. Michael Beiler
67.	**From:** kgositau Reed <kgositau@yahoo.com> **Sent:** Sunday, 24 January 2021 9:58 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
68.	**From:** ateenyi@protonmail.com <ateenyi@protonmail.com> **Sent:** Saturday, 23 January 2021 12:36 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,

	Ateenyi Sent from ProtonMail mobile
69.	From: Cassi Goodman <cassi@icon.co.za> Sent: Saturday, 23 January 2021 11:53 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
70.	**From:** Jim Emberger <shaleinfo.nb@gmail.com> **Sent:** Friday, 22 January 2021 9:14 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Seismic Survey EIA - registration Dear Dr. Mwiya: I am writing to register as an Interested Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. Could you please send me: • a full suite of the BID documents, • all documents pertaining to this activity, including, but not limited to, specialist studies on seismic testing in the area, • maps showing where the testing will occur and could occur, • an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. And, of course, any instructions on submitting comments. Thank you for your kind assistance, Jim -- Jim Emberger, Spokesperson New Brunswick Anti-Shale Gas Alliance www.noshalegasnb.ca
71.	**From:** Junias Amunyela <jnbamunyela@gmail.com> **Sent:** Friday, 22 January 2021 6:43 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Good day Dr Sindila MWIYA this is my submission Junias Nghilifavali Amunyela +264 812001383

	+264 61212905 Company N/A Thank you so much regards Mr J N Amunyela +264 81 200 1383
72.	**From:** Lisa Steyn <leef.tenvolle@gmail.com> **Sent:** Friday, 22 January 2021 4:03 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Lisa Steyn Lisa Steyn 083 758 7765 I am a concerned citizen of southern Africa and an environmentalist. I am also a member of the Frack Free Namibia & Botswana Community.
73.	**From:** Sarah Koß <sarah.koss@gmx.net> **Sent:** Friday, 22 January 2021 2:19 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** ReconAfrica Dear Dr. Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA, being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including, but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Sarah Koß (Germany) My full name: Sarah Jessica Koß Mobile \telephone number: 0049 176 63725757 Organisation that I am representing: No explicit organisation
74.	**From:** Vernon Hartung <cyprian.hartung@gmail.com> **Sent:** Friday, 22 January 2021 12:21 PM

	To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Sent from my Huawei phone
75.	**From:** Mala Mareachealee <mala.mareachealee@gmail.com> **Sent:** Friday, 22 January 2021 11:29 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Request for ReconAfrica meeting Dear Dr Sindile Mwiya, The Indigenous Peoples of Africa Coordinating Committee(IPACC) would like to make an official request to be an I and AP for the ReconAfrica Seismic testing EIA our email address is ipacc @iafrica.com Phone number is 27 82 904 5736 We would also be grateful if you could SMS to the list we previously sent the address and date of the village meetings . They would like to attend the Rundu meeting Many thanks Mala Marachealee
76.	**From:** klaus <klaus@coachplan.co.za> **Sent:** Friday, 29 January 2021 7:34 PM **To:** smwiya@rbs.com.na **Cc:** Carl.Schlettwein@mawlr.gov.na; Esau.Mbako@mawlr.gov.na **Subject:** RecondAfrica Oil and gas Prospecting in Namibia - Comments and EIA shortfalls - Interested and Effeted Party **Importance:** High RBS cc Risk Based Solutions - Windhoek / Namibia Attention : Dr. Sindila Mwiya ; cc Minister of Water Affairs <u>RE ; Oil and Gas exploration by RecondAfrica – Licence PEL 073 – Kavango Area</u> <u>Aggrieved and opposed to the oil and gas industry :</u> The bad news of an oil and gas exploration company in North East Namibia should be investigated and properly explained with the many shortages to their present developments and activities . They have obtained a prospecting licence in 2014/2915 from the Ministry of Mines . This without any pre consultations and discussions with

	the tribal leadership nor the local population affected, and no EIA done of the proposed prospecting areas . Some locals have heard about an oil company to operate in their region only about 2 months ago . The complete non transparency how the licences PEL 073 was obtained , by whom and under which conditions and costs must be investigated . That start in Namibia of RecondAfrica is very suspicious of the completion of all required formalities , and public notices as required by law. Why the total silence from RenondAfrica and the Namibia Government ,(who hold a 10% share in the company) , over the past 5 years.? Was the application made known through the Government Gazette in 2015 ? Were press releases made.? Which Minister approved this prospecting licence ? Was the Govt. Cabinet involved in the process ? Why was a permit granted in an important Conservation area , that is shared by 5 Nations - Angola , Namibia , Botswana , Zimbabwe and Zambia. The KAZA - TFCP - Kavango Zambezi - Trans Frontier Conservation Parks.? Why is such a bad polluting and environmental damaging Industry allowed , and handed an exploration licence. ? Now after 5 years of silence by RecondAfrica they state that they have that permit for the next 25 years ? Did they on this prospecting Licence application explain that "fracking"will be used to gain production efficiencies ? The above points specifically need to be addressed by the aurthorities and answer to the public , to prove that this prospecting Permit PEL 073 was obtained correctly , and complies to all rules and legal regulations required. **Water is Life !!** Namibia is an environmentally hard and beautiful country, that is very dependent on natural water supply and seasonal rains. There are times with severe droughts and water shortages , forcing the environment and local population to survive in sometimes very difficult times. Therefore no industry such as oil and gas production should be allowed where water supply is in short supply. The pollution factor is to great , and the amount of water consumed by the prospecting and production will deplete fresh water and underground water supplies. The dangers of poisoning by " fracking " is very real , resulting in waterways in the Swamps and wetlands to die and disappear. **Water is Life !!!** This industry is "environmentally a suicide", and to consider allowing the oil and gas production anywhere near or in the area of these environmental delicate areas is unbelievable . The company RecondAfrica is so desperate to push production with this poisonous hydraulic "fracking " that they have placed top "Fracking " officials in charge for the local Namibia exploration. It is well known how the "fracking "adversely has affected areas in the USA , poisoning fresh water supply and also groundwater , rivers and streams, and polluted the air with poisoned gases. The Canadians can stay at home with these environment destructive and poisoning industries. Do your "fracking " and oil production at home in Canada. RecondAfrica , don't rob the Namibians of their valuable and beautiful natural assets , such as wild life , biodiversity and conservation areas and valuable tourism parks and areas , in order to enrich yourselves as fast as possible with dirty oil sales ! All this to the expense of the country Namibia and the people of Namibia. Theodore Rooseveld said : Support Conservation ; " The Wildlife and its inhabitants cannot speak --- So we must and we will " . ! The pollution effects are the threat of existence of wild life species , Fauna and Flora , and total loss of biodiversity and conservation. These most important wetlands of the Okavango , are well known worldwide , and as such are treasured by both Namibia and Botswana. This invasion of a dirty oil and gas industry is threatening the existence of the huge natural wild life wetland areas .

	The attitude of this foreign Canadian company is arrogant and very bad. They have no respect for human rights and local life . An example is the San bushmen tribe living the area of Tsodilo Hills . These San sacred and holy grounds around the hills , are part of a UNESCO World Heritage Site . The whole area is now affected by this pollutant oil and gas prospecting industry. RecondAfrica took no notice of that when applying for the prospecting licence. They disregarded the human tribes that has lived in these areas for thousands of years. The San are so accustomed to their way of life in the bush as hunter gatherers, and now their future is threatened. They have not been consulted at all , and are frightened of their future. This is absolute disgusting that these money greedy foreigners don't give a dam towards the local tribes and communities , that are effected now and in future with this oil prospecting and production. The climate change factors and air pollution , are vastly affected by these oil and gas prospecting and productions. The world is moving towards saving our planet , with clean air for the survival of mankind , biodiversity and environment. This outdated " Fracking "method of obtaining cheap oil and gas at the expense of the environment and the local population and their way of life living on mother earth , should be respected and honoured. This is not done by RecondAfrika at all. The established position by the World Heritage Committee that mineral ,oil and gas explorations or developments is **incompatible** with World Heritage status . This is also for Conservation areas. IPIECA further states that this position is an important consideration for companies when assessing opportunities in or near World Heritage Sites. The ICIMM , representing the leading mining companies in the world together with the oil companies Shell made a landmark " No Go Commitment " not to explore or exploit for oil ,gas or minerals in and around World Heritage properties. Since 2013 , more companies made commitments , Total , Tullow , Soco and more to follow. The solution is therefore that RecondAfrika as a junior beginner , must undertake also this " No Go Commitment " , by handing in their prospecting Licences and fold up the Oil Rig and leave Namibia and Botswana. It is the duty of the Government to act and protect all the people of Namibia , and the beautiful environments and wetlands of Namibia. Klaus Gastrow - Individual – 29/1/2021 -- 18:25 klaus@coachplan.co.za **From:** klaus <klaus@coachplan.co.za> **Sent:** Monday, 25 January 2021 10:00 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA **Importance:** High Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Kind Regards Klaus Gastrow klaus@coachplan.co.za

	From: klaus <klaus@coachplan.co.za> **Sent:** Friday, 22 January 2021 10:42 AM **To:** frontdesk@rbs.com.na **Subject:** Virtual Meeting - Rundu **Importance:** High To : RBS Consultants - Windhoek Good morning , As requested by you I am sending you information to complete my registration for the virtual meeting this morning in Rundu at 10 : 00 Mr. Klaus Gastrow Private and Interested person Email : klaus@coachplan.co.za Mobile and office phone number : +49 152 3882 1253 Kind Regards Klaus Gastrow klaus@coachplan.co.za +49 152 3882 1253 mobile and whatsapp
77.	**From:** Hanneke Dempsey <hanneke@africanwanderer.com> **Sent:** Friday, 22 January 2021 10:16 AM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na **Subject:** ReconAfrica Kavango Oil + Gas exploration - registration to attend public meetings in Windhoek Good morning, I hereby register my interest in attending both public meetings about the ReconAfrica travesty that is planned for the Kavango East. I would also like to request a copy of the BID and available information about the environmental impact of current exploration activities and project timeline etc. I look forward to your reply and receiving the information. Hanneke

	Hanneke Dempsey Director African Wanderer Tours + Safaris Mobile/WhatsApp +264813644936 www.africanwanderer.com Based in Windhoek, Namibia VAT # 2481342015 NTB Reg # TS0016
78.	From: Sarah Ibrahim <saraha.ibrahim@outlook.com> Sent: Friday, 22 January 2021 4:19 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na Cc: savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Sarah=
79.	**From:** zan le roux <zanleroux@gmail.com> **Sent:** Thursday, 21 January 2021 7:58 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
80.	**From:** Divina Naidoo <NaidooD@Schindlers.co.za> **Sent:** Friday, 19 February 2021 4:19 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Marc Gevers <gevers@schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>; Phumzile Rabula <Rabula@schindlers.co.za>; Denis Mitole <Mitole@schindlers.co.za> **Subject:** RE: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia **Importance:** High Dear Dr. Mwiya,

We trust this email finds you well.

Kindly advise on the status of our submissions, as previously sent, and the processes that follow with regard to lodgement of the ECC.

We anticipate your responses herein.

Kind regards,

Divina

From: Divina Naidoo <NaidooD@Schindlers.co.za>
Sent: Friday, 12 February 2021 5:29 PM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Cc: Marc Gevers <gevers@schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>; Phumzile Rabula <Rabula@schindlers.co.za>; Denis Mitole <Mitole@schindlers.co.za>
Subject: RE: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia
Importance: High

SCHINDLERS

Dear Dr. Mwiya,

The above, together with you email, below, refer.

Kindly see attached hereto our extended submissions to the Draft Scoping Report for the proposed 2D seismic survey operation.

Should you have any queries or concerns please do not hesitate to contact us.

We look forward to future meaningful engagement.

Kind regards,

Divina

From: Divina Naidoo <NaidooD@Schindlers.co.za>
Sent: Friday, 29 January 2021 6:50 PM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Cc: Sindila Mwiya <smwiya@rbs.com.na>; Anja van Wijk <vanwijk@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>; timoteus.mufeti@met.gov.na; ceo@n-c-e.org; Nicole Rens <Rens@Schindlers.co.za>
Subject: RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73
Importance: High

Dear Dr. Mwiya,

The above, together with our correspondence, below, refer.
Kindly find attached hereto our submissions in relation to the Proposed 2D Seismic Survey Over AOI in PEL 73.

	We welcome your further commentary and engagement in regard to same. Best regards, Divina **From:** Divina Naidoo **Sent:** 28 January 2021 22:35 **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na>; Anja van Wijk <vanwijk@Schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya, Noted - with thanks. Best regards, Divina **From:** Divina Naidoo <NaidooD@Schindlers.co.za> **Sent:** Thursday, 28 January 2021 10:35 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na>; Anja van Wijk <vanwijk@Schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya,

Noted - with thanks.
Best regards,

Divina

SCHINDLERS

attorneys and notaries

From: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Sent: Thursday, 28 January 2021 10:28 PM
To: 'Divina Naidoo' <NaidooD@Schindlers.co.za>; 'Sindila Mwiya' <smwiya@rbs.com.na>
Cc: 'Anja van Wijk' <vanwijk@Schindlers.co.za>; 'Nicole Rens' <Rens@Schindlers.co.za>; 'Marc Gevers' <gevers@schindlers.co.za>; 'Danisha Naidu' <naidu@schindlers.co.za>; 'Lesai Seema' <seema@schindlers.co.za>
Subject: RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73
Importance: High

Dear Stakeholder,

In line with the regulatory requirements, the deadline for submission of comments / inputs is 29th January 2021 and will not be extended.

Many thanks,

Dr. Sindila Mwiya
PhD, PG Cert, MPhil, BEng (Hons

From: Divina Naidoo <NaidooD@Schindlers.co.za>
Sent: Thursday, 28 January 2021 1:53 PM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>; 'Sindila Mwiya' <smwiya@rbs.com.na>
Cc: Anja van Wijk <vanwijk@Schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>
Subject: RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73
Importance: High

Dear Dr. Mwiya,

The above, together with my e-mail, below, refer.

We write to you in respect of an update in relation to our humble request for an indulgence regarding the deadline for submissions.

Whilst we are cognisant of the fact that certain procedures are in place and cannot be removed, without the requisite authorities approval of same, we have required experts to assess our submissions in order to be mindful of your time and expertise when it comes to your consideration of same.

In light of the above, we seek the indulgence in order to be able to put something before you of substance addressing all issues and findings in relation to the Report and interrelated issues.

We look forward to hearing from you.

Best regards,

Divina

From: Divina Naidoo <NaidooD@Schindlers.co.za>
Sent: Monday, 25 January 2021 9:11 PM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>; 'Sindila Mwiya' <smwiya@rbs.com.na>
Cc: Anja van Wijk <vanwijk@Schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>
Subject: RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73

Dear Dr. Mwiya,

Thank you for your response and the confirmation of our team's registration as Stakeholders for the proposed 2D Seismic Survey Operation over the AOI within PEL 73, situated in the Kavango and East Regions.

As per your request, attached hereto is a list of each member of the team, along with the relevant details.

In consideration of the draft scoping report ("**the Report**"), as previously attached, we kindly request an extension in which to provide our written submissions. Given the highly technical scientific nature and the sheer volume of the Report together with the material risk to the livelihood of the local communities as well as the irreversible environmental damage we would need more time to consider and have our experts asses the Report.

Whilst we note that the intended lodgment of the ECC is **5 February 2021** we kindly request that our submissions be accepted by **1 February 2021** due to the aforementioned reasons provided.

We look forward to hearing from you and to further meaningful engagement.

Best regards,

Divina

From: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Sent: 22 January 2021 08:02
To: 'Sindila Mwiya' <smwiya@rbs.com.na>
Subject: RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73
Importance: High

Dear Interested /Affected Party,

I hereby confirm your registration as a Stakeholder for the proposed 2D Seismic Survey Operation over the exploration Areas of Interest (AOI) within PEL 73 situated in Kavango West and East Regions.

Please Note: If NOT provided, you are hereby required to provide us with the following additional information in validating your registration and email address on our AI existence screening system: **Your full names, mobile \telephone numbers and Organisation that you are representing.**

	Please see attached to this message the Draft Scoping Report for your information. The following public meetings and open days sessions are organised as part of the stakeholder and public consultation process for the proposed 2D seismic survey operations in PEL 73 and specifically targeting the regional and local communities of Kavango West and East Regions and an opportunity for a factual field visits for I&APs from outside the two (2) regions: (i) **Kavango West Region, Nkurenkuru, Nkurenkuru Community Hall, Wednesday, 20th January 2021, Morning Session from 10hrs00 to 12hrs00 Formal Meeting and Afternoon Session from 14hrs30 to 16hrs30 Open Sessions Public walk in as needed.** (ii) **Kavango East Region, Rundu, AMTA, Friday 22nd January 2021, Morning Session from 10hrs00 to 12hrs00 Formal Meeting and Afternoon Session from 14hrs30 to 16hrs30 Open Sessions Public walk in.** (iii) **Field-based public / local villages community meetings and poster sessions at key settlements such as Ncamagoro, Gcuru, Ncuncuni, Cuma, Mbambi, Ncaute and Kawe, all situated along the various seismic survey lines. The field-based meetings / sessions will be undertaken in coordination with the regional councillors and traditional authorities from Saturday 23rd to Monday 25th January 2021.** REGISTER BY EMAIL AND RESERVE A PLACE FOR THE MEETINGS: frontdesk@rbs.com.na or Contact Dr Sindila Mwiya for more Information: smwiya@rbs.com.na, Mobile: +264-811413229 DEADLINE FOR WRITTEN SUBMISSIONS IS: **FRIDAY 29th January 2021**, date for the lodgement of the application for Environmental Clearance Certificate (ECC) is **FRIDAY 5th February 2021** Additionally, all the environmental reports that will be submitted to the Environmental Commissioner will be subjected to further public consultation and disclosure by the Environmental Commissioner for a period of fourteen (14) days. All registered stakeholders will be informed once the environmental reports are available at www.eia.met.gov.na. Many thanks, **Dr. Sindila Mwiya** **From:** Divina Naidoo <NaidooD@Schindlers.co.za> **Sent:** Thursday, 21 January 2021 7:03 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Cc:** Jeffrey Barbee <jeffrey.barbee@gmail.com>; Anja van Wijk <vanwijk@Schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za> **Subject:** RECONNAISSANCE ENERGY AFRICA // OKAVANGO BASIN - Enlisting as Interested and Affected Party **Importance:** High Dear Dr. Mwiya, The above matter refers. By way of introduction, my name is Divina and I am an Associate at Schindlers Attorneys, a law firm based in Johannesburg, South Africa. Our firm's Eco-Forensics Department, our team cc'd herein, has partnered with Alliance Earth, a global non-profit reporting initiative, to report on illegal energy investments and assist the affected communities in protecting their rights and conserving the environment. We have been following the proposed seismic testing by Reconnaissance Energy Africa (ReconAfrica) in the Okavango-Epukiro Basin, and accordingly address this correspondence as an Interested and Affected Party in the ReconAfrica Seismic Testing Environmental Impact Assessment, to you as the Environmental Assessment Practitioner on the project.

	As citizens of a fellow Southern African state, we feel compelled to assist with the protection and conservation of the world's diverse ecosystems, which is also a UNESCO World Heritage Site. Whilst we are neither based in Namibia nor Botswana, we would appreciate an invitation to be a part of the public participation process and, as aforementioned, listed as an Interested and Affected party. We look forward to your future meaningful engagements and correspondences herein. Kind regards, Divina Divina Naidoo Associate 2nd Floor, 3 Melrose Boulevard Melrose Arch, Johannesburg Docex 10, Hyde Park P O Box 10909, Johannesburg, 2000 Website: www.schindlers.co.za Tel: +27(11) 448-9600 Direct Tel: 011 448-9738 Direct fax: 086 572 2844 Emergency/Bail: +27 83 631 2023
81.	**From:** Hafeni Hiveluah <hafexx@gmail.com> **Sent:** Thursday, 21 January 2021 5:30 PM **To:** Sindila Mwiya <smwiya@rbs.com.na> **Cc:** Dr. S. Mwiya (RBS-Foresight Group) <frontdesk@rbs.com.na> **Subject:** IP registration Afternoon. Pls register me as an IP for the proposed 2D seismic survey on PEL NO 73.Pls do sent BID info if available. Thanks in advance. Hafeni Let us be your compass🧭-Hiveluah Consult +264813216911

82.	**From:** Allan Jiji <ajiji@nnf.org.na> **Sent:** Thursday, 21 January 2021 3:24 PM **To:** frontdesk@rbs.com.na **Subject:** Confirmation of your registration as a Stakeholder for the proposed 2D Seismic Survey Operation in PEL 73 Dear Sir On behalf of my organization (The Namibia Nature Foundation), I would like to confirm my presence at Fridays stakeholder engagement meeting to be held at AMTA premises as an interested party. I also want to officially submit my comments with regards to the proposed 2D Seismic Survey Operation over the exploration Areas of Interest (AOI) within PEL 73 situated in Kavango West and East Regions. through the document attached in this email. Kind Regards Allen Namibia Nature Foundation
83.	From: Stephanie Mouton <steffi.j.m@gmail.com> Sent: Thursday, 21 January 2021 12:49 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Kind regards Stephanie
84.	**From:** John Rainbird <johnrainbird@iprimus.com.au> **Sent:** Thursday, 21 January 2021 11:39 AM **To:** smwiya@rbs.com.na **Cc:** savetheokavango@gmail.com **Subject:** Seismic Testing in the Kavango region

	Dear Dr Mwiya, It is with great concern I note the proposal to allow seismic testing and fracking to occur in the Kavango. Fracking has been a disaster for us here in many parts of Australia, with contamination of ground water supplies and disruptions to communities. It is also contributing to the issue of global climate disruption which is a threat to all nations, all peoples and all economies. I work professionally in the area of Climate Change for the Australian Government, it is my areas of expertise. I add my voice to those requesting an extension to the consultation process for this project. This initiative is gaining international attention because the Kavango region is of course globally significant for its environmental and cultural values. My qualifications are initially in Conservation Biology from the University of Cape Town, and I am deeply aware of how such projects create long term impacts on human and ecological communities that tend to outweigh the short term economic gains. I urge you and your government to focus on building wealth through sustainable development options rather than such projects which will have to be paid for by your children and their children in terms of the lasting negative impacts. This has been demonstrated in many parts of the world already. I'm sure you are a very wise man with a good heart focused on doing the right thing by your people and the Kavango region. Thank you for your consideration. John Rainbird Msc Consv . Biol. **www.johnjrainbird.com.au**
85.	**From:** JUNIOR <jnbamunyela@gmail.com> **Sent:** Thursday, 21 January 2021 10:57 AM **To:** smwiya@rbs.com.na **Subject:** Request for the information how to register Good day Dr Sindila Mwiya I am humble requesting you to provide me with the information about the registration of Kavango Basin meeting. Thank you so much Regards Mr Junias N Amunyela
86.	**From:** Glynis Humphrey <humphrey.glynis@gmail.com> **Sent:** Thursday, 21 January 2021 10:42 AM **To:** frontdesk@rbs.com.na **Cc:** smwiya@rbs.com.na **Subject:** Registration as IAP stakeholder: ReconAfrica Kavango oil & gas exploration - Seismic EIA Please register me as a stakeholder for this project. Please may I have a copy of the RBS Background and Information document for this study? Regards, Glynis -- Glynis Humphrey (PhD) Postdoctoral Research Fellow Plant Conservation Unit

	Department of Biological Sciences University of Cape Town South Africa http://www.pcu.uct.ac.za/pcu/about Cell: +27784114236 Skype: glynis.humphrey1 Email: humphrey.glynis@gmail.com
87.	**From:** Danie Toerien <ToerienD@ufs.ac.za> **Sent:** Tuesday, January 19, 2021 10:28 AM **To:** Caroline Gelderblom <caroline@gelderblom.co.za> **Subject:** Re: Shale Gas SEA. - new proposal for Oil and Gas Exploration in the Okavango Dear Dr Mwiya Because of limited information at this stage, I am concerned about the proposal that seismic testing be done in the Okavango catchment. Please extend the time for comment for a further 30 days given the impacts of the holiday season and complications caused by the Covid-19 pandemic. I was personally involved with the former Namibian Department of Water Affairs in assessment of *Salvinia molesta* infestation and its control in the Linyanti swamp in Caprivi. In addition, I was part of a team that studied Lake Liambezi as well as the team that carried out the Strategic Environmental Assessments for Shale Gas Exploration in the Karoo. I am aware that the planned exploration could significantly impact the environment and could be to the detriment of freshwater resources, activities such as tourism and of nature conservation. Given the decreasing importance of non-renewable energy sources in the world, the decisions about the proposed exploration in the Okavango catchment should be based on the best available knowledge, which seems to be lacking now. Yours sincerely Dr Daan Toerien **Danie Toerien** Research Fellow: Centre for Environmental Management Navorsingsgenoot: Sentrum vir Omgewingsbestuur Faculty / Fakulteit: Natural and Agricultural Sciences / Natuur- en Landbouwetenskappe PO Box / Posbus 339, Bloemfontein 9300, Republic of South Africa / Republiek van Suid-Afrika +27 (0)28 754 3623 +27 (0)82 770 9473 ToerienD@ufs.ac.za
88.	**From:** Max Muyemburuko <max.muyemburuko@gmail.com> **Sent:** Wednesday, 20 January 2021 10:19 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Interested & Affected Party Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, and all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used, the contacts of the scientists who have carried out the specialist studies, and again all other documents pertaining to this application.

	Thank you so much for your kind assistance, Many thanks Max Muyemburuko Chairperson Kavango East and West Regional Conservancy and Community Forestry Association
89.	**From:** Caroline Gelderblom <caroline@gelderblom.co.za> **Sent:** Monday, January 18, 2021 9:27 AM **To:** 'smiwiya@rbs.com.na' <smiwiya@rbs.com.na> **Cc:** 'savetheokavango@gmail.com' <savetheokavango@gmail.com> **Subject:** Okavango Oil and Gas exploration Dear Dr Mwiya I would like to register my concern about the proposal to do seismic testing in the Okavango and request that the time for comment is extended for a further 30 days in view of it being over the holiday season and with further complications caused by the Covid-19 pandemic. There was not enough time to scrutinise a project of this complexity and significant potential impact. From my personal involvement in the Strategic Environmental Assessments for Shale Gas Exploration in the Karoo I know that the exploration is undertaken in a systematic grid pattern which will result in substantial off road disturbance which will significantly impact the environment. This would reduce the wilderness characteristics of the area which is critical for tourism – this was the area of my expert input in the previous SEA. The sonic disturbance associated with the testing is also likely to have a significant negative impact on sensitive local wildlife especially elephants. This is a major concern in view of the international importance of this area for conservation. Any increased traffic in this area also increases risks of poaching. This is aside from the significant impacts that any actual exploitation would have on the freshwater resources of the region. It is also important to note that most of the long-term jobs are technical and unlikely to benefit people currently living in the area – this needs to be made clear to local communities in addition the fact that once extractive activities are withdrawn the viability of tourism would be significantly reduced as a result of the altered sense of place. Yours sincerely Caroline Gelderblom (Registered Professional Scientist)
90.	**From:** Tamara Guhrs <tamara.guhrs@gmail.com> **Sent:** Wednesday, 20 January 2021 9:01 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Tamara Guhrs (Schulz) My name is Tamara Guhrs Schulz Phone number +27732270777 I am an independent writer and consultant, specialising in working with communities that live in proximity to protected areas. I represent Seka Theatre from Zambia.

91.	**From:** Veruschka Pate <veruschka0107@gmail.com> **Sent:** Wednesday, 20 January 2021 8:18 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
92.	**From:** Jc Faul <fauljc@gmail.com> **Sent:** Wednesday, 20 January 2021 7:48 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Registration: for Seismic Survey and EIA Good day, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Kind regards JC Faul
93.	From: Jakaa K <faithkandanga@gmail.com> Sent: Wednesday, 20 January 2021 6:47 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Sent from my iPhone=
94.	**From:** Klaudia Schachtschneider <klaudia.schacht@gmail.com> **Sent:** Wednesday, 20 January 2021 4:20 PM **To:** frontdesk@rbs.com.na **Subject:** registration as a Stakeholder for the proposed 2D Seismic Survey Operation in PEL 73 Good day,

	I would like to register as an I&AP at your public meetings. I understand that one will be held in Windhoek at a later date and I would like to request the option to dial in remotely to that meeting, given covid precautions. Thank you kindly, Klaudia Schachtschneider
95.	From: annette.erbsloeh@namib-sunrise.de <annette.erbsloeh@namib-sunrise.de> Sent: Wednesday, 20 January 2021 3:51 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: save the okavango delta Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies Thank you so much for your kind assistance. Best regards Annette Erbslöh
96.	**From:** Maxi Louis <maxi@nacso.org.na> **Sent:** Thursday, 28 January 2021 4:10 PM **To:** 'Dr Sindila MWIYA' <frontdesk@rbs.com.na>; 'Annette Hubschle' <Annette.Hubschle@uct.ac.za> **Cc:** 'Chris Brown' <ceo@n-c-e.org>; 'Corinna van Wyk' <cvanwyk@lac.org.na> **Subject:** RE: Request for specialist reports and details of experts consulted Dear all, I have never come across this level of rudeness, it also discourages people to engage as he is rude to everyone sometimes just asking questions? Regards Maxi **From:** Maxi Louis <maxi@nacso.org.na> **Sent:** Wednesday, 20 January 2021 11:47 AM **To:** smwiya@rbs.com.na **Cc:** admin@reconafrica.com; sigridnyambe@gmail.com; 'Mighty Uguanga' <mightygng@gmail.com>; 'Chris Brown' <ceo@n-c-e.org>; 'Britta Hackenberg' <bh@nnf.org.na> **Subject:** Registration Good day, I trust this email finds you well. Kindly find attached for your attention.

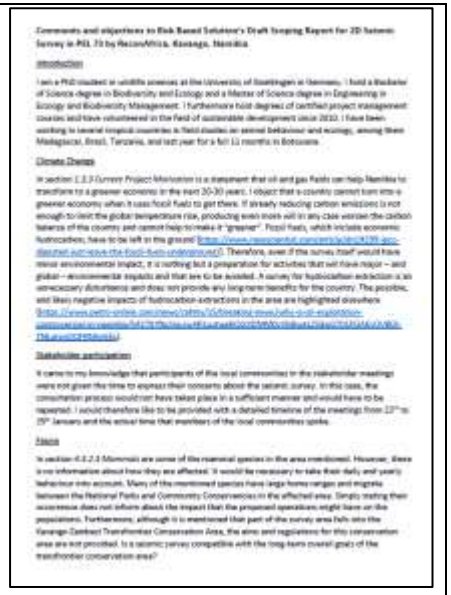
	Kindest regards, Maxi Louis **Maxi Pia Louis|Director** *19 Lossen Street| Ausspannplatz | 2nd Floor |P.O.Box 98353 Pelican Square Windhoek* *Tell : 00 264 (0)61 230 888 | Fax: 00 264 (0)61 237 036 | Cell: 00 264 (0) 81 322 6303* *E-mail: maxi@nacso.org.na | Website: www.nacso.org.na*
97.	**From:** Botha Ellis <botha.ellis1@gmail.com> **Sent:** Wednesday, 20 January 2021 8:35 AM **To:** frontdesk@rbs.com.na **Subject:** Registration as stakeholder Good morning, I'd like to register as stakeholder for your exploration work in northern Namibia. Please let me know what information you need? Kind regards, Botha Ellis 081 286 0456
98.	**From:** Goofy Jack <jackgoofy30@gmail.com> **Sent:** Tuesday, 19 January 2021 7:30 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, br>I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, yours In community safety and health, Goofy Jack
99.	**From:** Reeler, James <jreeler@wwf.org.za> **Sent:** Tuesday, 19 January 2021 2:21 PM

	To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Kind regards, **James Reeler** **:: Bioenergy Project Manager: WWF South Africa::** 1st Floor, Bridge House, Boundary Terraces, Mariendahl Lane, Newlands P.O.Box 23273, Claremont 7735 **Tel:** +27 21 657 6600 | **Direct:** +27 21 657 6688 | **Mobile:** +27 76 144 3678 | **Fax:** +27 86 535 9433 **Email:** jreeler@wwf.org.za | **Web:** www.wwf.org.za **Facebook:** WWF South Africa | **Twitter:** @WWFSouthAfrica | **Instagram:** @wwfsouthafrica
100.	**From:** Margie Pretorius <barefoot.margie@gmail.com> **Sent:** Thursday, 28 January 2021 11:20 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Submission as an IAP Good day I write to register my objection to exploratory drilling by Recon Africa in Namibia. 1) **There has been inadequate information given to local communities that will be impacted by the drilling, and by the extraction that will follow exploration, in order for them to make a free, prior and informed decision as to whether they consent to the project. The right to FPIC is recognised in the UN Declaration on the Rights of Indigenous People.** I am not a citizen of Namibia but in my work with Sustaining the Wild Coast (www.swc.org.za) I have learnt how governments and corporates worldwide work to persuade rural indigenous communities that extractive industries will benefit them. Governments fail to provide such communities with basic services (such as electricity or water) They then, hand-in-hand with corporates, tell these communities that they are poor and that they need the jobs and so called "benefits" that mining will bring. They fail to inform these communities of the negative impacts that mining will have on their land based livelihoods, and that very few of them will have the necessary skills to be employed by the mining companies. They fail to mention that any short term gains of a mining boom will be far eclipsed by the multifaceted and longterm negative impacts of mining. Governments fail to acknowledge that basic service delivery to all citizens should not be dependent on them being willing to accept use of their land for extractive industries which primarily benefits the companies executing the mining projects and the government officials that approve them. 2) **The cumulative impacts of the project have not been adequately assessed in the scoping report.** In response to objections to exploratory drilling governments and corporates always emphasize that exploratory drilling does not constitute extraction, and that environmental approval processes prior to extraction will protect residents and the environment from any negative impacts of extraction.Unfortunately, this piecemeal/compartmentalized approach to extractive processes is misleading, because exploration inevitably leads to extraction. It is irresponsible of governments and corporates not to ensure that the cumulative impacts of projects are not evaluated prior to any exploration taking place. 3) **The cumulative impacts of gas extraction in the Kavango Basin will be devastating from a water security and climate change perspective and will constitute a significant violation of human rights - both to affected residents in Namibia and Botswana, the Southern African region and the entire human species**. We have to transition away from

	fossil fuels to avoid an ongoing rise in global greenhouse gas emissions and climate change. Canada cannot responsibly honour its commitment to the Paris agreement whilst allowing Recon Africa to explore for gas in Kavango? Please acknowledge receipt of my submission. Thankyou Margie Pretorius Chairperson - Sustaining the Wild Coast www.swc.org.za **From:** Margie Pretorius <barefoot.margie@gmail.com> **Sent:** Tuesday, 19 January 2021 1:20 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Reigrastration as an IAP Dear Dr Mwiya I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Margie Pretorius
101.	**From:** Matt Totten <mwtotten@gmail.com> **Sent:** Tuesday, 19 January 2021 12:41 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Matthew W. Totten Jr.
102.	**From:** Hazel Milne <admin@ecoawards-namibia.org> **Sent:** Tuesday, 19 January 2021 12:00 PM **To:** frontdesk@rbs.com.na **Subject:** Registration for Eco Awards Namibia as stakeholder in the ReconAfrica Kavango oil & gas exploration Dear Dr. Mwiya

	Herewith I am applying for Eco Awards Namibia, to be registered as stakeholder in the above. I would also like to request the Project BID, and that one of the Public Consultation Meetings in this regard, be conducted in Windhoek. Thanks Hazel **Hazel Milne** **Program Coordinator** **Tel** (Weekdays 08h00 – 12h00)**: +264 (0)61 306 450; Fax : +264(0)61 306290; Mobile +264 (0)811285105** **Email:** admin@ecoawards-namibia.org **Web Site**: www.ecoawards-namibia.org
103.	**From:** pietjlsmit@gmail.com <pietjlsmit@gmail.com> **Sent:** Tuesday, 19 January 2021 11:49 AM **To:** frontdesk@rbs.com.na **Cc:** smwiya@rbs.com.na **Subject:** Register as an Intersted and Affected Party - Recon Africa Exploration project Dear Dr Mwiya, Can you please register me as an interested and affected party, as the current President of EAPAN, for this project and forward all relevant information in relation to it. I would also like to attend your public meetings if possible – could you please send the dates for these to me? Thanks and regards **Piet Smit** **On behalf of EAPAN** pietjlsmit@gmail.com **+264 81 706 3051 (NAM)** **+27 82 786 5881 (RSA)**
104.	**From:** Vera Pfannerstill <vpfanne@gwdg.de> **Sent:** Thursday, 11 February 2021 11:37 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia

Dear Dr. Mwiya,
I am a PhD student in wildlife sciences at the University of Goettingen in Germany. I hold a Bachelor of Science degree in Biodiversity and Ecology and a Master of Science degree in Engineering in Ecology and Biodiversity Management. I furthermore hold degrees of certified project management courses and have volunteered in the field of sustainable development since 2010. I have been working in several tropical countries in field studies on animal behaviour and ecology, among them Madagascar, Brazil, Tanzania, and last year for a full 11 months in Botswana.
Thank you for your thorough Draft Scoping Report for the proposed 2D seismic survey operations. I acknowledge your expertise in geology and your practical field-based technical industry experience. I also acknowledge that you have taken into account that the operations have environmental impacts such as noise pollution and waste production.
However, I have some points of critique. One major point is your statement that oil and gas fields can help Namibia to transform to a greener economy in the next 20-30 years (page 6, section *1.3.3 Current Project Motivation*). A country cannot turn into a greener economy when it uses fossil fuels to get there. If already reducing carbon emissions is not enough to limit the global temperature rise, producing even more will in any case worsen the carbon balance of the country. Fossil fuels, which include economic hydrocarbon, have to be left in the ground (https://www.newscientist.com/article/dn24299-ipcc-digested-just-leave-the-fossil-fuels-underground/). Therefore, even if the survey itself would have minor environmental impact, it is only a preparation for activities that will have major – and global – environmental impacts and are to be avoided. A survey for hydrocarbon extraction is an unnecessary disturbance and does not provide any long-term benefits for the country. The possible, and likely negative impacts of hydrocarbon extractions in the area are highlighted elsewhere (https://www.petro-online.com/news/safety/15/breaking-news/why-is-oil-exploration-controversial-in-namibia/54278?fbclid=IwAR1uxhagBQGXDMM0yVbBwgLZGkpG701KGAEvOVBOI-TNLorsnOOFRMmItEs).
Furthermore, it came to my knowledge that participants of the local communities in the stakeholder meetings were not given the time to express their concerns about the seismic survey. Could you provide me with a detailed timeline of the meetings from 23rd to 25th January and the actual time that members of the local communities spoke?
In section *4.3.2.3 Mammals* you mention some of the mammal species in the area. However, there is no information about how they are affected. It would be necessary to take their daily and yearly behaviour into account. Many of the mentioned species have large home ranges and migrate between the National Parks and Community Conservancies in the affected area. Simply stating their occurrence does not inform about the impact that the proposed operations might have on the populations. Furthermore, although you mention that part of the survey area falls into the Kavango Zambezi Transfrontier Conservation Area, you do not provide the aims and regulations for this conservation area. Is a seismic survey compatible with the long-term overall goals of the transfrontier conservation area?
In section *5.3.2 Proposed Project Alternatives and Ecosystem Assessments* you mention the “No Action Alternative”. It is stated that negative environmental impacts are still likely to take place even in the absence of the proposed petroleum explorations. While this might be true, you do not propose any other alternative of better projects. Instead of a seismic survey, a survey of solar energy, wind or the effects of reforestation and improvements of the wetlands in the area could be undertaken. Yes, development might be poor in the area and the people likely do seek employment. However, this does not have to take place with compromising the region’s and the world’s future. Please provide a long-term environmental impact assessment including worst-case-scenarios where the consequences of a completion of the seismic survey, ongoing oil extractions, ground water pollution, oil spill into the adjoining rivers, air pollution and health effects for the local communities are explained. Please include the costs of these worst cases. Then, please seek examples of sustainable, environmentally friendly projects that could also be undertaken in the area and their possible benefits. You may compare the long-term costs of worst-case scenarios of the sustainable projects with the long-term costs of worse-case scenarios of the seismic survey, but one should not compare the best case of the one with the worst case of the other. The seismic survey with its prospect to oil extractions does stand in contrast to the 17 UN sustainable development goals by providing only short-term jobs and long-term environmental, health, water supply and food production risks. Therefore, the decision for an Environmental Clearance Certificate for the seismic survey is a decision that will stand for the future of Namibia's development and its position in between countries leading towards carbon emission free economies and should be taken in favour of sustainable, emission-free solutions.
Thank you very much for your consideration.
Kind regards,
Vera Pfannerstill
Vera Pfannerstill
M. Sc. Engineering in Ecology and Biodiversity Management
PhD candidate Wildlife sciences, University of Göttingen
vpfanne@gwdg.de



	From: Vera Pfannerstill <vpfanne@gwdg.de> **Sent:** Tuesday, 19 January 2021 11:31 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Seismic survey Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Vera Pfannerstill
105.	**From:** Hamutenya Jacob Haungenda <hamutenyajacobh@gmail.com> **Sent:** Monday, 18 January 2021 6:33 PM **To:** frontdesk@rbs.com.na **Subject:** Effected Community Hi! Good afternoon,i hope you are doing well in your good office to assist me with the following information: a). The drilling Gas and Fuel in Kavango East, Ndiyona Constituancy in George Mukoya conservancy and Community Forest program. I heard some rumours by next month February 2021 the company responsible will start transporting the machine in the Katere Road to Khaudom National Park. Thanks, With regards Jacob Hamutenya
106.	**From:** Christiian Mahnke <hcmahnke@lac.org.na> **Sent:** Tuesday, 19 January 2021 10:46 AM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na **Cc:** pwatson@lac.org.na; 'Corinna van Wyk' <cvanwyk@lac.org.na> **Subject:** Attendance at Public Consultation Meetings for proposed 2D Seismic Survey, PEL No 73 Dear Mr Mwiya, My name is Hans-Christian Mahnke, from the Legal Assistance Centre's (LAC) Land, Environment and Sustainable Development Department (LEAD). I herewith register myself and my colleague Peter Watson as interested and affected parties, representing the LAC. The LAC/LEAD has been registered via Corinna van Wyk, coordinator of LEAD at the LAC. Our full details are: Hans-Christian Mahnke, Laurie Stevens Str 6, Windhoek, Tel: 0855630949. Organisation: Legal Assistance Centre, Windhoek. Peter Watson, Plot 57, Brakwater, Tel: 0812336862. Organisation: Legal Assistance Centre, Windhoek. Please confirm receiving this email and noting down our registration. Furthermore, if you would please send us asap the specific places, venues and times for the public consultation meetings taking place Saturday, 23, and Sunday, 24 Jan, this would be highly appreciated. Best Hans-Christian Mahnke

107.

From: Mala Mareachealee <mala.mareachealee@gmail.com>
Sent: Friday, 22 January 2021 10:46 AM
To: smwiya@rbs.com.na
Subject: Community meetings on Saturday

Dear Dr Sindile Mwiye,

Thank you so much for taking time to speak with me. I'm emailing you the list of delegates who would like to attend the community meeting on Saturday. Please advise them by SMS on the venue of the meeting

Many thanks
Mala Marachealee
IPACC Secretariat

Name and Surname	Institution	Contact Details	Place
Alfred Cheddau	IRDNC facilitator of Kyaramacan Association	0813319810	Kavango East
Margret Kamba	IRDNC; Women's Empowerment Project		Kavango East
Thaddeus Cheddau	Senior Khwe Council Member	0818984088	Kavango East
Teddy Mushavanga	Senior Khwe Council Member	**0818065661**	Kavango East
Kudumo Stephanus	Ambrosius Haingura Forestry	081 255 1363	Kavango West
Mutonga Thomas	Kapinga Kamwali	081 625 3029	Kavango East
Max Muyemburuko;	Muduva Myangana	081 288 5354	Kavango East
Kanyetu Joseph;	Ncaute Community Forestry	081 443 6581	Kavango West
Shaningwa Klepas;	Katope Community Forestry	081 443 6581	Kavango East

From: Mala Mareachealee <mala.mareachealee@gmail.com>
Sent: Tuesday, 19 January 2021 10:35 AM
To: frontdesk@rbs.com.na
Subject: Public Consultation Registration

Dear Colleague,

	I'm writing from the Indigenous Peoples of Africa coordinating Committee(IPACC) and would like to register the following delegates to attend the public consultations taking place on the 22nd of January in Okavango East. I would also like to find out routing of the meetings scheduled for the 23 to 25 January as we would like to make arrangements for community members to attend 1. Mr Abraham Bokko, Headman, Khwe Traditional Authority 2. Mr Alfred Cheddau, IRDNC/Kyaramacane Trust 3. Ms Margret Kamba, Women's Empowerment Project/IRDNC 4. Mr Thaddeus Cheddau, Senior Khwe Council Member 5. Tennie Mushavanga, Youth Representative, Kyaramacane Trust. Please advise Many thanks Mala Wicksteed
108.	**From:** Alexandra Speiser <amspeiser@yahoo.com> **Sent:** Tuesday, 19 January 2021 9:00 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** registration as an IAP for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Sindila could you register me for the above project and send me the relevant documents for review. My contact details: Alexandra Speiser, Director of ASECcc Tel: 0811245655 email: amspeiser@yahoo.com Thanks a lot Alexandra Speiser ASECcc P.O. Box 40386 Windhoek Namibia cell +264 (0)81 124 5655

109.	**From:** I Van Wyk <ivanwyk@ombudsman.org.na> **Sent:** Monday, 18 January 2021 11:47 AM **To:** frontdesk@rbs.com.na **Subject:** RISK BASED SOLUTIONS Dear Sir/Madam Please find attach letter for your attention. Regards I C VAN WYK PRIVATE SECRETARY OFFICE OF THE OMBUDSMAN: NAMIBIA TEL: +264 61 2073224 FAX: +264 61 220550 EMAIL: ivanwyk@ombudsman.org.na OMBUDSMAN: NAMIBIA 18 January 2021 Ikani Indongo & Diva Amutenu Office of the Ombudsman RISK-BASED SOLUTIONS (RBS) CC Dear Sir/Madam With reference to your advertisement in the local news papers, the Ombudsman wishes to register his office as an interested party; Mr. Ikani Indongo and Mr. Diva Amutenu are nominated to attend both public meetings at Nkurenkuru on 20 January and Rundu on 22 January 2021 respectively. Kindly reserve places for them at the meetings. Trusting that you will comply with my request, I look forward to hearing from you soon. Yours sincerely JOHN N NETUMBO OMBUDSMAN
110.	**From:** Auriol Ashby <Ashby@aacc.com.na> **Sent:** Wednesday, 10 February 2021 11:19 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; smwiya@rbs.com.na **Cc:** Marvin Sanzila <marvinconsultants@outlook.com> **Subject:** Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia Dear Sandila, Here is a further comment which I would like recorded in the Scoping Report regarding the EIA Process for the 2D Seismic Survey. Please include this in full in the IAP report. The Environmental Impact Assessment Regulations (No 30 of 2012), in terms of the Environmental Management Act 7 of 2007, clearly state the general requirements for an Environmental Assessment Practitioner (EAP). In Section 4, the Regulations state "4. An EAP designated in terms of Section 3, **must** ….(b) **perform the work relating to the application in an objective manner**, even if this results in views and findings that are not favourable to the applicant". 1. At the public meeting held in Windhoek on 2nd February 2021 at 10am, Dr Sandila Mwiya's introduction clearly demonstrated his lack of objectivity towards the EIA process. He said "On this specific project, I am actually a consultant to ReconAfrica, supporting them to get a permit for the proposed 2D seismic survey". A Live recording is available on https://www.facebook.com/namibiansun/videos/252377499630086 2. The Draft Scoping Report, is boldly entitled "Application for ECC …", which again implies little or no objectivity to the EIA. 3. In the same Draft Scoping Report, Piii, Dr Mwiya's Statement of Qualifications includes the following: "Currently, (2020 - 2023) Dr. Sindila Mwiya is responsible for **permitting planning through to operational and completion compliance monitoring** …. for multiple major upstream onshore and offshore petroleum, mineral and mining projects, Solar and wind projects .." **I believe that the EIA process and scoping report demonstrate a lack of objectivity which disqualifies Dr Mwiya from being an EAP for this project.**

	Please only include your response to this comment in the Scoping Report. I do not want to be bullied and insulted again, as per your email of the 18th January. Perhaps I should raise your intimidation tactics towards IAPs as another objection to the EIA process of RBS. Regards Auriol Auriol Ashby Ashby Associates cc P.O. Box 11513 Windhoek, Namibia Tel: (+264) 61 233679 Cell: (+264) 81 240 9678 Fax: (+264) 88637016 **From:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Sent:** Thursday, 21 January 2021 11:22 AM **To:** 'Auriol Ashby' <Ashby@aacc.com.na> **Cc:** 'marvinconsultants@outlook.com' <marvinconsultants@outlook.com> **Subject:** RE: Comments as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 **Importance:** High Dear Auriol, Please see my comments in red below. Many thanks, **Dr. Sindila Mwiya** **From:** Auriol Ashby <Ashby@aacc.com.na> **Sent:** Monday, 18 January 2021 6:16 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Comments as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Sindila, Thank you for registering me for the above project and sending me Volume 2 of 3 for petroleum exploration. (You may not be aware but when it opens in Acrobat it is called "Vol. 2 of 3 EIA for Solar Energy (SECURED)". The details of my contact details were in my email footer: Ms Auriol Ashby, Director of Ashby Associates cc Tel: (+264) 61 233679 Cell: (+264) 81 240 9678 I am a practicing socio-economist in Namibia since 1994 and I have provided specialist services to many proponents requiring EIAs since 2008. I support projects which bring sustainable development to Namibia's people and I strongly believe in the value of well researched and objective EIAs which have been clearly presented to all IAPs. My comments, which I expect you to attach to the EIA Scoping Report to be submitted to MEFT, are as follows: 1. Re: Draft Scoping Report, Jan-2021: P1, paragraph 2 refers to a Petroleum Agreement already signed between ReconAfrica and the GRN. For full public transparency, this agreement should be copied in the Final Scoping Report, as the seismic surveys are only a small part of the overall project plan. This full transparency is essential as ReconAfrica published on LinkedIn on 18 September 2020 the following details: *"RECON AFRICA DISCOVERS KAVANGO BASIN IN NAMIBIA*

ReconAfrica is a junior oil and gas company engaged in the exploration and development of oil and gas in Namibia. ReconAfrica holds a 90% interest in a petroleum exploration licence in northeast Namibia which covers the entire Kavango sedimentary basin. The exploration licence covers an area of approximately 25,341.33 sq km (6.3 million acres), and based on commercial success, it entitles ReconAfrica to obtain a 25 year production licence. The Kavango Basin offers both large scale conventional and non-conventional play types." (My highlight in yellow")

ReconAfrica acquired a high resolution geomagnetic survey of the licence area and conducted a detailed analysis of the resulting data and other available data, including reprocessing and reinterpretation of all existing geological and geophysical data. The survey and analysis confirm that the Kavango Basin reaches depths of up to 30,000 feet, under optimal conditions to preserve a thick interval of organic rich marine shales, and is anticipated to hold an active petroleum system".

1.1. A Petroleum Agreement is a confidential document. All the key provision of the Agreement are provided in the Draft Scoping. Secondly you can download the MPA from www.mme.gove.na. The Seismic survey is one of the exploration commitments that ReconAfrica must undertake. Promotional materials of ReconAfrica has nothing to do with the current proposed scope of work of undertaking a 2D seismic survey and requiring an ECC.

2. Re: Draft Scoping Report, Jan-2021: Pxi, paragraph 4: This paragraph is confusing. It states that "following on the drilling of the stratigraphic wells, the company intends to conduct 450km long 2D seismic survey operations …. Depending on the outcomes of the proposed 2D seismic survey, exploration drilling … may be undertaken..". Please clarify in the Scoping Report whether the drilling of the 2 wells, for which RBS conducted at Environmental Assessment in June 2019, have been drilled already and if so, what were the results?

2.1 It not confusing. The only problem is that so many people want to be experts of highly technical field of oil and gas exploration that they do not understand, have no experience and no technical training whatsoever. Despite the fact that it fully explained in the Draft Scoping Report, some stakeholders have already made-up their mind based on social media uninformed and opportunistic donation-based business postings that is claiming that oil has been discovered and production will taking place in the Okavango Delta. The current project activities are greenfield exploration. In brief oil exploration involves, application for license, geophysical desktop study to look for areas of interest within the license area, if the sedimentary basin is known, seismic survey is implemented to search for potential reservoir structures and if found exploration well drilling is conducted. If there is a discovery, then appraisal drilling is conducted to assess the economics of the discovery and possible development options. ReconAfrica only has geophysical data-based confirmed basin and the current ongoing drilling of the stratigraphic well is meant to validate and confirm the presence of basin to be followed by 2D seismic survey.

3. In the RBS June 2019 EIA volume 2 of 3 for the drilling of 2 wells in Blocks 1819 and 1820, page 68: RBS reports that the Regional political and traditional leaders consulted, have given "greater positive support from IAPs because if the results of the proposed petroleum drilling operations prove positive, it will tremendous and positively transform the local, regional and national socioeconomic landscapes of Kavango West Region and Kavango East Region and Namibia as a whole". **RBS documents that the project is of national importance and therefore at least one public meeting should be held in Windhoek** AND that meeting should enable virtual access via Teams or Zoom so that IAPs can attend and comment virtually without being at risk of spreading COVID-19.

3.1 Auriol, just like in many minerals EPLs, this project is a very early stage exploration project with zero guarantees for discovery because it is exploration situated in Kavango West and East and has nothing do to with any other region, town or village outside the area of interest. Over the last 15 years, I have managed 8 offshore well drilling operations and plenty more minerals and petroleum exploration projects that I am current supporting and also being supported by many other consultants in different parts of the onshore and offshore Namibia and where the investors have promoted the potential of their exploration projects to international markets but I have not seen public meetings being conducted in Windhoek just because there is an assumed "potential" for a discovery that does not yet exists. This project is no difference, it just an exploration project with assumed sub-knowledgebase and an overall knowledge-base that must be de-risked in order to improve the boundary conditions that underscores the exploration knowledge-base model objectives.

4. The current draft scoping report for the 2D seismic survey does not indicate any potential negative impacts. You have set up an Assessment matrix used for assessing the likely significant impacts (p111), yet you have not documented any potential positive or negative impacts to be assessed in the EIA phase.
   a. What are the potential cumulative impacts of 450km of seismic surveys? Localised temporarily. To in the EIA report.
   b. Will new cutlines be opened between existing roads? This is clear in the report please read it. I have very clear drone images and maps showing each and every survey line and you're a still asking questions on cutline, why??
   c. What impact will the seismic work have on wildlife, particularly elephants? There are no elephants roaming in the roads where the survey is going to take place.
   d. What are the potential impacts from extraction should a petroleum resource be discovered, given that ReconAfrica seems to have been granted a 25 year production licence already? Extraction of what? There is nothing to extract. The current Scopes of work or activities requiring an ECC is **2D SEISMIC SURVEY it is not oil or gas production**. It does not exists. How do you expect me to provide you with potential impacts of oil and gas production that does not exists. Even the existence of

	the Kavango Basin is current unknown and waits the outcome of the ongoing stratigraphic (geological logging) drilling operations. If there is a **commercial** discovery a separate EIA will be done. Production is completely irrelevant to the current scope of work. 5. RBS can be congratulated for arranging field-based meetings /sessions in local villages along the survey lines. The full content of the presentations given at all public and focus group meetings should be included in the Scoping Report. For RBS to present a balanced and objective summary of the project, you should include the short, medium and long-term potential positive and negative impacts of not only the 2D surveys, but also of exploration drilling and full petroleum extraction. These descriptions should be presented in layman's language, as for as is possible. There is no objectivity that can be achieved by writing on resource that do not exist with zero guarantee that there will be a commercial discovery. That is called speculation and is very dangerous and irresponsible misleading of the Capital Markets especially if it is coming from some of us who are supporting multiple international listed companies. The Scope of Work is clear **2D seismic survey, okay**. Please do not ever try to teach me how to do EIA,s of what not to include and include I really hate this level of disrespect, I am highly technically qualified and experienced and know exactly what I am doing. 6. The EIA Scoping Report should present the context of petroleum exploration (and future potential production) in terms of Namibia's current and future commitments to reducing activities that promote climate change. Please see a point 5. Production is irrelevant to the current scope of work, which is 2D seismic survey. In my view you seem not to understand oil and gas exploration. You are talking of including future production, production of what. There is nothing to produce!! In comparison to what many may be familiar with and in this case minerals and mining, imagine a greenfield minerals exploration EPL EIA where nothing is known and a client is only doing seismic survey to identify potential targets within the EPL and you expect such an EIA to discuss and assess potential impacts of mining operations (underground, open pit IRM etc). If there is a commercial discovery appropriate multiple EIAs will be done and final one will be undertake as part of oil or gas field development feasibility study. Please inform all IAPs as soon as a date for a virtual Windhoek meeting date has been set. Best wishes, Auriol Auriol Ashby Ashby Associates cc P.O. Box 11513 Windhoek, Namibia Tel: (+264) 61 233679 Cell: (+264) 81 240 9678 Fax: (+264) 88637016
111.	**From:** Brigid pohl <brigidpohl@gmail.com> **Sent:** Sunday, 17 January 2021 5:09 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Concerns about oil exploration in Namibia Dear Dr Mwiya I have 4 questions which I hope you can answer. I am one of a group of South Africans who are deeply concerned about oil exploration in Namibia and the implications that it has in terms of impacting on the ecology of the Okavango River and the Delta. My concerns deepened when I saw the call for objections that is required for the purposes of providing an ECC - with a very short time lapse between the public meetings (place and time still to be advised) and the deadline for objections. Pictures have been published of ReconAfrica's drilling rig arriving by ship in Namibia and drilling operations already underway (with a great deal of denuding of vegetation at the drill site.) My question to you here is - how is it possible for ReconAfrica to start drilling before the ECC requirements have been fulfilled?

	In your paper you provide reassurances about environmentally friendly use of existing roads and pathways. My second question to you is, how did RBS manage to find these routes that so conveniently follow the path of the testing that you propose to do? With respect, this legend has a feel of disingenuity about it as do most legends about preserving all that is good and providing a better life for all. I have written to ReconAfrica and the Canadian High Commissioner in Pretoria and am in the process of contacting as many influential conservation organisations globally that I can find with the hope that small voices will become loud. My third question to you is, at a time when most of the thinking world is concerned about environmental degradation and the possible role it has had in creating a global pandemic, why is a Canadian company like ReconAfrica doing business in a country where they will bear no consequences for the damage that they cause? I see that the Government of Namibia has a purported 10% stake in ReconAfrica. My fourth question is - do you think this a big enough share for giving away the resources and heritage of the people of Namibia? My full name is: Diana Brigid Pohl My mobile number: 082 823 3681 I represent: Grandmothers defending the Heritage of Southern Africa for Future Generations (GDHSAFG)
112.	**From:** Lebogang Seitshiro <lseitshiro@yahoo.com> **Sent:** Sunday, 17 January 2021 3:01 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Registration as Interested and Affected Party (I&AP) for Public Consultations on the 2D Seismic Survey EIA Dear Dr Mwiya, I hope this email finds you well. I hope you and your family are faring well in this present time that we're experiencing in human history. I saw your advertisement for registration as an interested and affected party (I&AP) for consultation on the 2D Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica and I am registering. Please could you provide me with the BID and any other documents pertaining to this. This would include all documents pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Will there be any online consultations? I look forward to hearing back from you and thank you for your assistance. Kind regards, Lebogang Seitshiro
113.	**From:** Rosalia Ruben <rruben@murd.gov.na> **Sent:** Friday, 15 January 2021 4:29 PM **To:** aloysia sitoka <upithe81@gmail.com>; 'Anita L Hausiku' <Anita-hausiku@kavangorc.gov.na>

	Cc: Nghidinua Daniel <ndaniel@murd.gov.na>; Big-Don Kondunda <dkondunda@murd.gov.na>; tobias newaya <tnewaya@murd.gov.na>; F Sindano <fsindano@murd.gov.na>; Bernice Van Wyk <bvanwyk@murd.gov.na>; hsecretary@murd.gov.na; frontdesk@rbs.com.na **Subject:** Proposed 2D Seismic Survey Operations in the Petroleum Exploration Licence (PEL) No. 73 Public and Stakeholder Consultation Invitation and copy of the draft Environmental Scoping Report **Importance:** High **Dear Aloysia and Anita,** **Compliments for the new year. Attached, kindly find the letter from Risk-Based Solutions (RBS)cc, for your CRO's information and for them to liaise with the company where necessary.** **Kindly acknowledge the receipt of this email.** ***Rosalia Ruben*** ***Private Secretary to the ED*** ***Ministry of Urban and Rural Development*** ***Tel: 061-297 5180*** ***Fax: 061-258131*** ***Email: rruben@murd.gov.na*** Risk – Based Solutions (RBS) CC Consulting Arm of Foresight Group Namibia (FGN) (PEL) LTD Dr Sindila Mwiya Technical Consultant / EAP Risk-Based Solutions (RBS) CC
114.	**From:** Vanessa Black <black@ispace.co.za> **Sent:** Friday, 15 January 2021 3:50 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Registration as I&AP Seismic Testing in Kavanago Dear Dr Mwiya I would like to register as an Interested and Affected Party for the Seismic EIA being carried out by RBS on behalf of ReconAfrica. I request a full suite of documents pertaining to this application including *inter alia* the BID documents; public scoping and consultation plans; maps showing where the testing will occur and could occur, an outline of the equipment to be used, specialist studies on the impacts of seismic testing in the area, and the list of names, CVS and contacts of the specialists involved in producing these. Thank you so much for your kind assistance, Vanessa Black
115.	From: Okavango Delta <savetheokavango@gmail.com> Sent: Friday, 15 January 2021 3:44 PM To: smwiya@rbs.com.na; Dr Sindila MWIYA <frontdesk@rbs.com.na> Cc: savetheokavangodelta@gmail.com Subject: Registration as I&AP for 2-D seismic survey

	Dear Dr Mwiya, We would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. We would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Frack Free Namibia and Botswana
116.	**From:** Tanya-African Bush Bird Tours cc <info@bushbird.com> **Sent:** Friday, 29 January 2021 11:06 AM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na; admin@reconafrica.com **Subject:** ReconAfrica Dear Sir, Dear Madam, With this letter, I would like to express my absolute highest concerns and VETO with the oil and gas drilling in the Kavango Basin / Kavango-Zambezi Transfrontier Conservation Area and many other conservancies and wildlife reserves. This prospect area also includes the UNESCO World Heritage Site of Tsalido Hills. This is taking place in a protected nature area – many livelihoods are at stake here and those of many animals, especially elephants. To that, the seismic testing harms the animals a lot, as they are very sensitive to these frequencies. I am convinced, that these testing are liked with the many elephants deaths in that area. ReconAfrican is a unethical company, I would like to raise may voice! This exploration must be stopped by our government, to protect the Namibia's and also the wildlife, Namibia as to offer. Please be so kind as to the EIA to me. **Mit freundlichen Grüßen / Kind regards** **Tanya Förtsch** African Bush Bird Tours cc/2004/2355 P / Bag 13100 Windhoek 10001 Namibia Tel: +264-61-256848 Cell: +264-81-889 9199

	From: Tanya-African Bush Bird Tours cc <info@bushbird.com> **Sent:** Friday, 15 January 2021 11:39 AM **To:** smwiya@rbs.com.na **Subject:** Okavango Oil Hi there, We have great worries about the new ventures planned for the oil production in the Okavango area and would like to be registered as I&AP. Can you please assist in this matter? Thank you. **Mit freundlichen Grüßen / Kind regards** **Tanya Förtsch** African Bush Bird Tours cc/2004/2355 P / Bag 13100 Windhoek 10001 Namibia Tel: +264-61-256848 Cell: +264-81-889 9199
117.	**From:** Ina Wilkie <ina@worldfuturecouncil.org> **Sent:** Friday, 15 January 2021 7:36 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** register as an Interested and Affected Party for the Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Ina Neuberger Wilkie Senior Project Manager World Future Council Windhoek, Namibia Hamburg, Germany ina@worldfuturecouncil.org mobile Namibia: +264 (0) 81 244 39 81

	www.worldfuturecouncil.org www.futurepolicy.org
118.	**From:** mkh.hoffmann@iway.na <mkh.hoffmann@iway.na> **Sent:** Thursday, 14 January 2021 9:34 PM **To:** frontdesk@rbs.com.na **Cc:** smwiya@rebs.com.na **Subject:** Registration as interested and affected party, EIA Recon-Africa Okavango Basin Oil and Gas Exploration Project Good day, I hereby wish to register as an interested and affected party for the EIA of the Recon-Africa Okavango Basin oil and gas exploration drilling project in the Kavango Region of northeast Namibia. Kindly let me know should you require any additional information for qualifying as interested and affected party. Thank you and kind regards, Karl-Heinz Hoffmann Geological Consultant P.O. Box 5531 16 Sanderburg Street, Windhoek - Namibia Tel +264 61 252312 Fax2email:+264 88 638 448 Cell +264 81 279 3636
119.	**From:** MagdaLena <ndengumagdalena1@gmail.com> **Sent:** Thursday, 14 January 2021 6:01 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
120.	**From:** Chris Sand <christsand517@gmail.com> **Sent:** Thursday, 14 January 2021 4:55 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya,

	I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Chris Sand
121.	From: ya mom <zialydia123@gmail.com> Sent: Thursday, 14 January 2021 4:16 PM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
122.	**From:** Lea-Liezer N <lealiezer@gmail.com> **Sent:** Thursday, 14 January 2021 3:36 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
123.	**From:** gundula wagner <gundelwagner@gmail.com> **Sent:** Thursday, 14 January 2021 2:25 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Gundula Wagner
124.	**From:** Simorne Januarie <simornejanuarie56@gmail.com> **Sent:** Thursday, 14 January 2021 2:04 PM

	To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance. Simorné Januarie
125.	**From:** Jess Northey <jessnorthey@gmail.com> **Sent:** Thursday, 14 January 2021 1:18 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Interested and affected party Dear Dr. Mwiya, I hope all is well. I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you for your kind assistance, Dr. Jessica Ayesha Northey
126.	**From:** Corinna van Wyk <cvanwyk@lac.org.na> **Sent:** Thursday, 14 January 2021 12:41 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Cc:** 'Dandago !Gaoses' <dandagogaoses@gmail.com> **Subject:** Application to be Registered as an Interested Party Good day Dr Mwiya I hope this correspondence finds you well. My name is Corinna van Wyk, the coordinator of the Legal Assistance Centre's Land, Environment and Development Project. Given our mandate and interest in matters affecting the environment, I hereby apply to have the Legal Assistance Centre registered as an interested party in terms of the "Public Notice for the Application for the Environmental Clearance Certificate for the Proposed 2D Seismic Survey Covering the Area of Interest in the Petroleum Exploration License No. 73 Kavango Basin, Kavango West and East Regions, Northern Namibia." I hereby also request the Project Background Information Document, and any relevant information currently at your disposal. Further, also provide specific dates and times for the field-based public/local community meetings in Ncamagoro, Gcuru, Ncuncuni, Cuma, Mbambi, Ncaute and Kawe.

	Thank you in advance for your timely response. Kind regards *Corinna van Wyk* *Project Coordinator,LEAD* *Legal Assistance Centre* *4 Marien Ngouabi Street* *Windhoek* *Tel: +264 61 223356* *Fax: +264 61 234953* Web: www.lac.org.na
127.	From: Eveline Amwaalwa <amwaalwaeveline@gmail.com> Sent: Thursday, 14 January 2021 10:21 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Importance: High Dear Dr Mwiya I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Sent from my Huawei Mobile
128.	**From:** Anne und Wolfgang Ramdohr <info@ibenstein-weavers.com.na> **Sent:** Thursday, 14 January 2021 11:49 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na **Subject:** Register as in interested party for the EIA being carried out for ReconAfrica Dear Dr Mwiya, My name is Wolfgang Ramdohr, and I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Wolfgang Ramdohr
129.	**From:** Nashilongweshipwe <jacquesmushaandja@gmail.com> **Sent:** Thursday, 14 January 2021 11:33 AM

	To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
130.	**From:** Tumweneni <kristytina6@gmail.com> **Sent:** Thursday, 14 January 2021 10:50 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance,
131.	From: Shishani M <mweutas@gmail.com> Sent: Thursday, 14 January 2021 10:26 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com Subject: Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance Etuhole Mweuta
132.	**From:** Pena Hamutengela <penahamutengela@gmail.com> **Sent:** Thursday, 14 January 2021 10:15 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Pena
133.	**From:** shen nanyanga <shen.nanyanga@gmail.com> **Sent:** Thursday, 14 January 2021 10:05 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA

	Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Shen Nanyanga +264 85 122 6971 EDEN NAMIBIA
134.	**From:** Eldin Lawrence <eldinlawrence@gmail.com> **Sent:** Thursday, 14 January 2021 10:03 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Kind Regards Eldin Lawrence
135.	**From:** Donovan Wagner <donovan.wagner@mail.com> **Sent:** Thursday, 14 January 2021 8:43 AM **To:** frontdesk@rbs.com.na **Subject:** Re: ReconAfrica Seismic Survey EIA On 14/01/2021, 08:37 Donovan Wagner <donovan.wagner@mail.com> wrote: Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thank you so much for your kind assistance, Donovan Wagner
136.	**From:** Petu K. Hamutenya <pinchaah@gmail.com> **Sent:** Thursday, 14 January 2021 8:20 AM **To:** frontdesk@rbs.com.na **Cc:** smwiya@rbs.com.na **Subject:** Registration: Public Notice for the proposed 2D Seismic Survey in the Petroleum Exploration Area

	To whom it may concern This email is just to inform your office to reserve a place for me, **Petrus Kudumo Hamutenya,Development Planner at Kavango West Regional Council**, for the upcoming meeting in regards with Public Notice for application for environmental clearance certificate (ECC) for the proposed 2D Seismic survey covering the area of interest (AOI) in the petroleum exploration. Should you need any additional information on my profile, you may contact me directly,0812210092, or contact our office, 066-264875/264853. Thank you Best regards **Petrus Kudumo Hamutenya** **Development Planner** **Kavango West Regional Council** **Tel: 061-264875** **Cell: 0812210092**
137.	**From:** Sharifah Farah Debah Syed Mohammad <farahd.mohammad@gmail.com> **Sent:** Thursday, 14 January 2021 5:08 AM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Okavango Delta Seismic Testing Dear Dr Mwiya, Greetings and i hope this email finds you and your team well. I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica, and hereby, request for a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Thanking you in advance for your kind understanding and assistance in this matter. Thank you and regards, Farah Debah
138.	**From:** Nikola Fahrbach <nikola.fahrbach@gmail.com> **Sent:** Wednesday, 13 January 2021 10:00 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** Registration as an interested and affected party Dear Dr Mwiya,

	I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies Thank you so much for your kind assistance, Nikola Fahrbach
139.	Mr. Stefanus Sitoka, Owner of the Communal Farm where the well 5-6 is located, Mobile Phones: +264816055218/813120998, Email: sitoka.sitoka@gmail.com
140.	**From:** Roy Miller <roymm36@mweb.com.na> **Sent:** Thursday, 17 December 2020 9:41 AM **To:** Sindila Mwiya <smwiya@rbs.com.na> **Cc:** 'Pauline Lindeque' <paulinel@agra.com.na> **Subject:** Seismic EIA Dear Sindila, As an I and AP I would like you to send me a copy of the seismic EIA for Recon Africa as soon as it is available. Roy. Dr. Roy McG. Miller Consulting Geologist PO Box 11222 Windhoek 11009 Namibia
141.	Thomas Ngoma – Farmer wishing to attend field meetings to be informed on the times (send by sms) Email: ngomathomasm@gmail.com Mobile: +264 812570118
142.	From: Aya de Ruiter <ayaderuiter@telfort.nl> Sent: Wednesday, 13 January 2021 3:12 PM To: frontdesk@rbs.com.na Subject: Okavango oil drilling Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies Thank you so much for your kind assistance, Aya de Ruiter
143.	From: Matheus Kasera <kmatheuz@gmail.com> Sent: Wednesday, 13 January 2021 2:59 PM To: frontdesk@rbs.com.na Subject: Nkurenkuru Public meeting Good day,

	I hereby request for a seat reservation on the stakeholder and public consultation on the proposed 2D seismic survey operation in the Kavango East and West region. Kindly book me a seat for a meeting in Nkurenkuru on the 20th for both sessions.
144.	**From:** Marilyn Lilley <marilyn@rsaweb.co.za> **Sent:** Friday, 12 February 2021 11:54 PM **To:** Teofilus.Nghitila@met.gov.na; smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** I&AP - additional comments re extended deadline 12 Feb 2021 FW: comments - Proposed 2D Seismic Survey Operation in PEL 73 Additional comments to those that I have previously submitted – as per extended deadline 12 Feb 2021 Please reply with A WRITTEN ACKNOWLEDGEMENT OF RECEIPT Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya Environmental Assessment Practitioner (EAP). REF ReconAfrica's Seismic EIA Scoping Report. I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. This is a letter to formally register very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I am concerned about many issues: **From:** Marilyn Lilley <marilyn@rsaweb.co.za> **Sent:** Saturday, 30 January 2021 12:04 AM **To:** Teofilus.Nghitila@met.gov.na; frontdesk@rbs.com.na; smwiya@rbs.com.na **Cc:** 'marilyn' <marilyn@rsaweb.co.za> **Subject:** comments - Proposed 2D Seismic Survey Operation in PEL 73 Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya Environmental Assessment Practitioner (EAP). REF ReconAfrica's Seismic EIA Scoping Report. I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. Please reply with A WRITTEN ACKNOWLEDGEMENT OF RECEIPT This is a letter to formally register my very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I believe that the Public Participation is flawed – I believe that it is not a fair and reasonable PPProcess and for several reasons I believe that it should be completely redone. • A Problematic comment period • The notice period was sent out during a holiday period • only 17 working days were given to the public to research and understand a very complex topic and many complex related issues. Two full extra weeks should be given for comments. • The notice was sent out during a holiday period when it is known that many people are not able to spend time researching a complex topic like this and sending comments • Only one notice appeared in a public newspaper instead of in two newspapers • Notices were not put up in the affected areas for the local communities to be informed of the proposed seismic survey and to register as I&AP's • They were not given the opportunity to inform themselves about seismic surveying . • Many people do not have the ability to send emails to register and to comment. Yours sincerely Interested and affected party Marilyn Lilley Cape Town South Africa

From: Marilyn Lilley <marilyn@rsaweb.co.za>
Sent: Thursday, 21 January 2021 12:53 AM
To: 'Dr Sindila MWIYA' <frontdesk@rbs.com.na>
Cc: smwiya@rbs.com.na; 'marilyn' <marilyn@rsaweb.co.za>
Subject: Online meeting RE: Confirmation of your Registration as a Stakeholder for the Proposed 2D Seismic Survey Operation in PEL 73
Importance: High

Dear Dr Mwiya

Thank you for my registration as an I&Ap

I would like to book to attend an online public meeting as due to Covid I do not feel safe in places where there are many people.
I avoid public places and public events.
Please can you book me a place in the online meeting.

Thank you,
Regards,
Marilyn Lilley

From: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Sent: 13 January 2021 07:07 PM
To: 'Sindila Mwiya' <smwiya@rbs.com.na>
Subject: RE: Confirmation of your Registration as a Stakeholder for the Proposed 2D Seismic Survey Operation in PEL 73
Importance: High

Dear Interested /Affected Party,

From: Marilyn Lilley <marilyn@rsaweb.co.za>
Sent: Wednesday, 13 January 2021 11:00 AM
To: smwiya@rbs.com.na
Cc: marilyn@rsaweb.co.za
Subject: Register as an I&AP re PEL 73 2D Seismic survey
Importance: High

Dear Dr Mwiya,

I wish to please register as an Interested and Affected Party for the PEL 73 2D Seismic Survey .
Please can all the relevant related documents, and including the BID document be forwarded to me.

1. Please can you confirm the exact total area applied for that will be covered by 2-D seismic testing.
2. Can you confirm if any 3-D seismic testing planned? Will it be included as additional seismic testing as part of or during this seismic survey process?
3. Is there an EIA for 2D and for 3Dseismic testing and is it available?
4. Are there regulations in place for seismic testing and is this available?

	5. I believe that a public meeting should also be held in Windhoek as part of the democratic inclusive public participation process. 6. Is a meeting in Windhoek being arranged? if so can you please confirm the date, venue and time? 7. Has an impact assessment been done on any possible impacts on animals, and especially elephants? https://www.youtube.com/watch?app=desktop&feature=player_embedded&v=tQxC8ahSdkg&fbclid=IwAR3ykDn4rRF_BZJe0dAp1wDrKh4EUkbWD_YyLRETvbizdk-r5KVO16G4s0s8. 8. Will any communities need to be moved out of the vicinity of the lines of thumper trucks and related equipment? 9. How will ground water be protected from any impacts? 10. Have any recent indepth surveys been conducted in these areas under 2D – and any 3D- application in the past year to determine the structures below ground as there may have been movement from the time that any past surveys were conducted with changes to structures and paths of ground water. – that may impact the water availability to communities that depend on this existing ground water. Thank you Kind regards, Marilyn Lilley
145.	**From:** Fernando Razu Muhopi's Finest <fnmarungu@gmail.com> **Sent:** Wednesday, 13 January 2021 10:26 AM **To:** smwiya@rbs.com.na **Subject:** Request For Documentations Pertaining to the Oil Exploration in for the EIA in the Kavango East Good day Sir.... Following media reports on social media regarding public meetings that will be conducted in due course, I'd like to request for any documentation pertaining to the the EIA for me to familiarize myself with the scope of the project so that we could make informed contributions to the success this particular project. Your prompt response is thus appreciated in advance. Kind regards. Fernando Marungu Resident, Former Land Board Secretary and Communal Farmer of the Kavango East Region.
146.	From: Laina Wilhelm <laina@eccenvironmental.com> Sent: Wednesday, 13 January 2021 8:52 AM To: frontdesk@rbs.com.na Cc: smwiya@rbs.com.na; Mariska Kuschke <mariska@eccenvironmental.com>; Stephan Bezuidenhout <stephan@eccenvironmental.com>; Jessica Mooney <jessica@eccenvironmental.com> Subject: ReconAfrica Kavango oil & gas exploration - Seismic EIA announcement Good day, Kindly register us Environmental Compliance Consultancy (ECC), as stakeholders for this project "ReconAfrica Kavango oil & gas exploration, PEL 77 - Seismic". Please provide for us the BID (Background Information Document) as well. Thank you.

	-- Kind regards, Laina Wilhelm Environmental Compliance Consultancy (ECC) Position: Assistant Environmental Practitioner Office Tel: +264 81 669 7608 Postal: PO BOX 91193 | Klein Windhoek | Namibia Address: 1 Jan Jonker St | Wasserberg Park | Klein Windhoek | Namibia Email: laina@eccenvironmental.com Website: www.eccenvironmental.com
147.	From: Laurel Neme <laurel@laurelneme.com> Sent: Tuesday, 12 January 2021 6:44 PM To: Mwiya Sindila <smwiya@rbs.com.na>; frontdesk@rbs.com.na Cc: Neme Laurel <laurel@laurelneme.com> Subject: Fwd: Registration for seismic survey EIA Dear Mr. Mwiya, I am writing again to confirm my registration as an Interested and Affected Party for the Seismic EIA being carried out by RBS on behalf of ReconAfrica, in accordance with the NEMA regulations of 2011. I would also like to request all of the background information documents as well as other documents pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, details on additional roads to be built, an outline of the equipment to be used, the contacts of the scientists who have carried out the specialist studies, and again all other documents pertaining to this application. Thank you so much for your kind assistance. Best regards, Laurel Neme, PhD
148.	**From:** Annette Hubschle <Annette.Hubschle@uct.ac.za> **Sent:** Tuesday, 23 February 2021 3:18 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; Sindila Mwiya <smwiya@rbs.com.na> **Cc:** Corinna van Wyk <cvanwyk@lac.org.na>; maxi@nacso.org.na; Scot Evans <scot.evans@ReconAfrica.com>; Claire Preece <claire.preece@ReconAfrica.com>; Craig Steinke <craig@reconrecon.com>; Chris Brown <ceo@n-c-e.org>; savetheokavango@gmail.com; josephineamwaalwa@gmail.com; jan@africaexposed.co.za; veruschka0107@gmail.com **Subject:** Re: Request for specialist reports and details of experts consulted Dear Dr Mwiya Could you please update me as regards progress on the EIA process for the 2-D seismic survey? Some people were informed of an extension to the submission deadline. I never received a notification.

I have been checking daily on the MET portal and have not found any environmental reports to date.

"Additionally, all the environmental reports that will be submitted to the Environmental Commissioner will be subjected to further public consultation and disclosure by the Environmental Commissioner for a period of fourteen (14) days. All registered stakeholders will be informed once the environmental reports are available at www.eia.met.gov.na."

As previously requested, could you please forward all specialist studies, fieldwork notes and the details of the experts consulted?

Could you also please make available the environmental management plan for the EIA process on the exploratory boreholes?

Kind regards

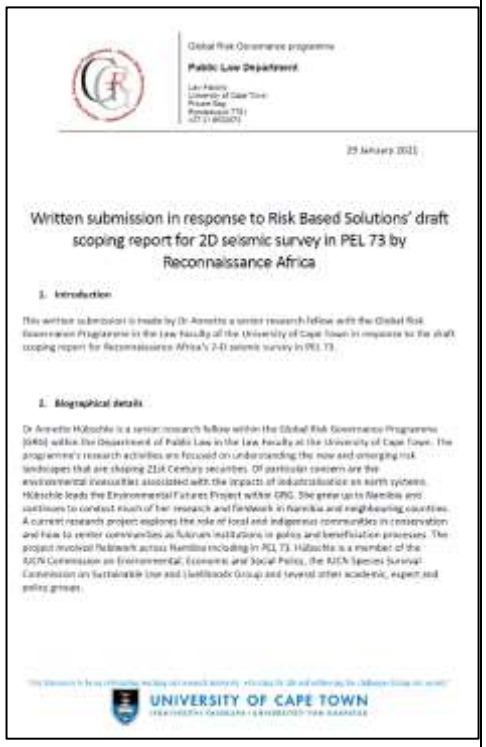
Annette

From: Annette Hubschle <Annette.Hubschle@uct.ac.za>
Sent: Friday, 29 January 2021 10:57 PM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>; Teofilus.Nghitila@met.gov.na
Cc: savetheokavango@gmail.com
Subject: Registered stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73

Dear Sirs
Please find attached my written submission regarding ReconAfrica's proposed 2D Seismic Survey in PEL 73.
Kind regards

Annette Hübschle

Dr Annette Hübschle
Global Risk Governance Programme
Faculty of Law
University of Cape Town
Email: a.hubschle@uct.ac.za | Mobile: +27 (0) 73 171 2841 |
LinkedIn | Twitter | Academia | Researchgate


Global Risk Governance programme

Public Law Department

29 January 2021

Written submission in response to Risk Based Solutions' draft scoping report for 2D seismic survey in PEL 73 by Reconnaissance Africa

1. Introduction

2. Biographical details

UNIVERSITY OF CAPE TOWN

From: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Sent: Thursday, 28 January 2021 06:19
To: 'Annette Hubschle' <Annette.Hubschle@uct.ac.za>
Cc: Christopher Brown <ceo@n-c-e.org>; 'Corinna van Wyk' <cvanwyk@lac.org.na>; maxi@nacso.org.na
Subject: RE: Request for specialist reports and details of experts consulted

Dr Hubschle,

	As a so called expert / specialist in oil and gas exploration and on the receiving environment of Kavango West and East Regions that you wholly claim to be and elevated by your uninformed clique, you should know better that the reason I send the Draft Scoping Report to you is for you to provide me with your so called expertise in oil and gas exploration and specifically the proposed 2D seismic survey operations and the receiving environment of the Area of Interest (AOI) in Kavango West and East Regions and by the way please note that the AOI is not inthe Okavango Delta or the Banks of the Okavango River or San Community land. The Draft Scoping Report has been provided to you and it is not for you come back to me and demand reports and documents that have been cited. Many other documents have been reviewed as part of EIA process for the proposed 2D seismic survey and I am under no obligations whatsoever to now send you all the documents that have been reviewed and yet you claim to be an expert / specialist in oil and gas exploration and on the receiving environment of Kavango West and East Regions and specifically the Area of Interest which you believed was on the banks on the Okavango River. We are all accountable to the State, not to you, your clique or any NGO or entity whatsoever. Please provide your technical / expertise inputs to the EIA Process not demands for reports that have only been cited. Many thanks **Dr. Sindila Mwiya** **From:** Annette Hubschle <Annette.Hubschle@uct.ac.za> **Sent:** Wednesday, 27 January 2021 9:42 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na>; Chris Brown <ceo@n-c-e.org>; Corinna van Wyk <cvanwyk@lac.org.na>; maxi@nacso.org.na **Subject:** Request for specialist reports and details of experts consulted **Importance:** High Good morning Dr Mwiya The Draft Scoping Report for the 2D seismic survey makes reference to specialist studies including fieldwork (p 76). Could you please share these studies and provide details of the experts that conducted these studies and the fieldwork? Many thanks for your assistance Annette **Dr Annette Hübschle** Global Risk Governance Programme Faculty of Law University of Cape Town Email: a.hubschle@uct.ac.za | Mobile: +27 (0) 73 171 2841 | LinkedIn | Twitter | Academia | Researchgate On 13 Jan 2021, at 19:06, Dr Sindila MWIYA <frontdesk@rbs.com.na> wrote:

CAUTION: This email originated outside the UCT network. Do not click any links or open attachments unless you know and trust the source.

Dear Interested /Affected Party,

I hereby confirm your registration as a Stakeholder for the proposed 2D Seismic Survey Operation over the exploration Areas of Interest (AOI) within PEL 73 situated in Kavango West and East Regions.

Please see attached to this message the Draft Scoping Report for your information. The following public meetings and open days sessions are organised as part of the stakeholder and public consultation process for the proposed 2D seismic survey operations in PEL 73 and specifically targeting the regional and local communities of Kavango West and East Regions and an opportunity for a factual field visits for I&APs from outside the two (2) regions:

Kavango West Region, Nkurenkuru, Nkurenkuru Community Hall, Wednesday, 20th January 2021, Morning Session from 10hrs00 to 13hrs00 Formal Meeting and Afternoon Session from 15hrs00 to 18hrs00 Open Sessions Public walk in as needed.

Kavango East Region, Rundu, AMTA, Friday 22nd January 2021, Morning Session from 10hrs00 to 13hrs00 Formal Meeting and Afternoon Session from 15hrs00 to 18hrs00 Open Sessions Public walk in.

Field-based public / local villages community meetings and poster sessions at key settlements such as Ncamagoro, Gcuru, Ncuncuni, Cuma, Mbambi, Ncaute and Kawe, all situated along the various seismic survey lines. The field-based meetings / sessions will be undertaken in coordination with the regional councillors and traditional authorities from Saturday 23rd to Monday 25th January 2021.

REGISTER BY EMAIL AND RESERVE A PLACE FOR THE MEETINGS: frontdesk@rbs.com.na or Contact Dr Sindila Mwiya for more Information:smwiya@rbs.com.na, Mobile: +264-811413229

DEADLINE FOR WRITTEN SUBMISSIONS IS: **FRIDAY 29th January 2021**, date for the lodgement of the application for Environmental Clearance Certificate (ECC) is **FRIDAY 5th February 2021**

Additionally, all the environmental reports that will be submitted to the Environmental Commissioner will be subjected to further public consultation and disclosure by the Environmental Commissioner for a period of fourteen (14) days. All registered stakeholders will be informed once the environmental reports are available at www.eia.met.gov.na.

Many thanks,

Dr. Sindila Mwiya

<Vo. 1 of 3 - Draft Scoping Report for the Proposed Petroleum Exploration covering PEL 73 AOI-JAN 2020.pdf>

From: Annette Hubschle <Annette.Hubschle@uct.ac.za>
Sent: Tuesday, 12 January 2021 5:03 PM
To: smwiya@rbs.com.na
Cc: Dr Sindila MWIYA <frontdesk@rbs.com.na>; Annette Hubschle <Annette.Hubschle@uct.ac.za>
Subject: Registration as an interested and affected party for 2-D seismic survey in PEL 73

Dear Dr Mwiya

	Compliments of 2021. May the year offer us all some reprieve. Congratulations on winning the tender for conducting the tender. Following up from your kind offer to register me as an IAP for the seismic survey in case your bid was successful, I would like to officially register as an interested and affected party for the EIA for the 2-D seismic survey carried out by RBS on behalf of Recon Africa. Could you also please provide me with all supporting documentation including the project BID documents, any other relevant documents relating to the seismic survey including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used, the contacts of the scientists who have carried out the specialist studies, and any other documents pertaining to this application? Could you also clarify whether the seismic survey takes places along 450 km or 450 square kilometres? Many thanks and kind regards Annette **Dr Annette Hübschle** Global Risk Governance Programme Faculty of Law University of Cape Town Email: a.hubschle@uct.ac.za | Mobile: +27 (0) 73 171 2841 | LinkedIn | Twitter | Academia | Researchgate
149.	From: John Grobler <john.grobler@icloud.com> Sent: Tuesday, 12 January 2021 3:48 PM To: frontdesk@rbs.com.na Cc: smwiya@rbs.com.na Subject: Registration as Interested Party Dear Sir / Madam Please add me as an Interested Party to the Renaissacance-Africa consultation process for all correspondence and public events. I represent various international and South African media outlets and have a special interest in environmental matters. Thank you. John Grobler John Grobler Journalist Windhoek, Namibia +264 81 240 15 87 john.grobler@icloud.com
150.	**From:** Neil <neil@botalafarm.com> **Sent:** Tuesday, 12 January 2021 11:05 AM **To:** smwiya@rbs.com.na

	Cc: frontdesk@rbs.com.na **Subject:** Interested party to the ReconAfrica explorations in both Botswana and Namibia. God morning Dr Mwiya I would like to register my interest in the ReconAfrica explorations in both Botswana and Namibia, as an interested and concerned party. I do have quite a bit of info on the Namibian operation, but would appreciate it if you could pass on the EMP document, I have the EIA report. However I can not find much info for the Botswana prospecting / exploration, if you could pass any info that would be very much appreciated or could point me in the right direction to try and get info, especially any EIA/EMP and the location maps, etc. Thank you and best regards Neil Fitt Agricultural, Environmental & Natural Resource Consultant Botswana Mobile / Whatspp: +267 71306796
151.	From: Jeffrey Barbee <jeffrey.barbee@gmail.com> Sent: Friday, 29 January 2021 11:19 AM To: frontdesk@rbs.com.na; timoteus.mufeti@met.gov.na; elly.hamunyela@met.gov.na Subject: Dear Mr. Mwiya REF Submission: Seismic survey comments ATTN: For the EAP for the ReconAfrica Seismic Survey EIA Scoping Report. I am registered as an interested and affected party for this seismic survey. I have a background in oil and gas development from working offshore of Angola in oil exploration, as well as working as the climate reporting fellow for the Open Society in 2010 to 2012, and then again following the global oil and gas business as the Director of the award winning film The High Cost of Cheap Gas. I am also the writer of the series about this current development for National Geographic. After reading the scoping report for the seismic survey I am struck by three very important facts that should be included in any further EIA to come and in any ongoing investigation into the current drilling program.. 1) Baseline water studies of every well within a kilometer of the seismic lines appear to not be called for or done. There is ample evidence from around the world to suggest that seismic surveying can disrupt underground aquifers, especially in soft sand. Before this testing is allowed to go forward, it is imperative to do water testing at every borehole and well along the 450km route that the drop weight trucks would go. To that end please provide me with any water studies that the EAP has done or commissioned to have done both for this EIA and the previous one for the Stratigraphic wells in PEL73. 2) I am concerned that only 15% of all the people living in the two regions of Kavango have access to the internet regularly as per this study: https://beta.documentcloud.org/documents/20464488-statistics-namibia-nids_2016#document/p66/a2013739 How are people who will be impacted by these developments supposed to register or get informed about something that could affect them for the rest of their lives? Real consultations in person should take place, and by only allowing people to participate through electronic means that they don't possess the EAP is preventing real public participation. The Environmental Management Act is clear that people must be informed of anything that could impact them and impinge upon their rights granted through article 95 of the constitution, and your means of communication disenfranchises the majority of people who have a right to know about this potentially dangerous activity. To that end I officially request a copy of the list of interested and affected parties to the first EIA for ReconAfrica's stratigraphic wells, as well as the one for this EIA, including all written comments from the IAPs for both projects.

	3) In the communication to me, the EAP has suggested that fracking is a fantasy, suggested I buy stock in the company, and has promoted this project both in the scoping report and in his personal emails. This is against the published regulations. According to page 9, regulation 4b in the published EIA regulations in the Government Gazette of 2012: An EAP must "perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;" It is clear from the scoping report, which reads like a piece of advertising for ReconAfrica that the EAP has not carried out this fundamental duty and should be removed, the Environmental Clearance Certificate should be revoked for the current drilling program and a full investigation of his actions for this and the previous EIA should be launched. A new strategic environmental assessment is clearly needed that takes in the entirety of this project in line with international best practice. Thank you for your time and attention, Jeffrey Barbee From: Jeffrey Barbee <jeffrey.barbee@gmail.com> Sent: Tuesday, 12 January 2021 9:30 AM To: smwiya@rbs.com.na; frontdesk@rbs.com.na Subject: Registration As An Interested And Affected Party 1Seismic EIA for ReconAfrica Dear Mr. Mwiya, In accordance with the NEMA regulations of 2011 I would like to register as an Interested and Affected Party for the Seismic EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, and all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used, the contacts of the scientists who have carried out the specialist studies, and again all other documents pertaining to this application. Thank you so much for your kind assistance, Jeffrey Barbee, National Geographic Contributor

152.	**From:** Niko Kisting <nicolaaskisting@gmail.com> **Sent:** Monday, 11 January 2021 11:03 PM **To:** frontdesk@rbs.com.na **Cc:** bertchenk@iway.na; black@ispace.com.za **Subject:** Registering as an Interested or Affected Party Dear Sir/Madam, How are you? Best wishes for the New Year! I would hereby like to register as an Interested and Affected party i.t.o. the drilling and prospecting for oil in northeastern Namibia and in northwestern Botswana by Recon Africa. I'm a Namibian and a retired teacher, as well as an environmental and social activist. I've been a member of Earthlife, Africa Namibia Branch, for many years. I'm furthermore part San and Khoi, and so consider myself to have indigenous roots and rights in this country. I'm furthermore an avid nature lover and nature conservator. I love traveling and camping in our beautiful country. I have visited Kavango and Bushmanland and found them to be exceptionally beautiful and special. Many areas, like Bushmanland are wilderness areas with very special biodiversity like the African Elephant, lions, and many more. Bushmanland is also the home of the San indigenous community who are very few in number and very fragile socially. I would like to be informed about the proposed project and to give input, where possible and appropriate, to make the undertaking as sustainable as possible, with as little damage to the environment and to local communities and livelihoods as possible. As you know, the Kavango Region and Okavango Delta are very sensitive, parts of it are conservation areas and attract tourists, who bring in valuable income, as well as many jobs in the tourism and hospitality sectors of Botswana and Namibia. Some areas in Botswana are also UNECO heritage sites, meaning that they have special value and should be conserved for the benefit and enjoyment of people the world over. The Okavango Delta is also the source of very special and fragile biodiversity and ecosystems and the area is the source of thousands of local livelihoods. I therefore feel that I would like to be fully informed and to be able to make inputs into the proposed activities in Namibia and Botswana. I thank you. Niko Kisting **From:** Niko Kisting <nicolaaskisting@gmail.com> **Sent:** Monday, 11 January 2021 9:09 PM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na **Cc:** bertchenk@iway.na; black@ispace.za **Subject:** Oil Drilling in Kavango Dear Sir/Madam, I am writing re. the drilling and prospecting for oil which has purportedly started today in the Kavango.

	I would like to know, please: Have consultative meetings with local communities and other affected parties taken place already? The planned meetings reported in the media: What is the use of holding them after the drilling has already started? How are the local communities, special vulnerable groups like the San and the wider Namibian and Botswana societies going to benefit,? Specifically i.t.o job creation, training and skills creation, infrastructure development, scholarships and projected taxes paid into Namibian Government coffers? Is Recon Africa taking responsibility for environmental pollution to underground and surface water sources, biodiversity disturbance and loss, damage to landscapes, etc. or are they going to make their profits and leave for Canada and leave the mess for Namibians and Batswana to clean up and sort out? Thank you very much Niko Kisting Namibian Environmental & Social Activist

153.

From: Andy Gheorghiu <andy.gheorghiu@mail.de>
Sent: Thursday, 28 January 2021 10:35 PM
To: frontdesk@rbs.com.na; smwiya@rbs.com.na
Cc: marvinconsultants@outlook.com; Teofilus.Nghitila@met.gov.na
Subject: Registered stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73

Dear Dr. Sindila Mwiya,

as a confirmed and registered stakeholder, I herewith contribute to the submission process.

Please find my submission attached. It would be nice if you could confirm receipt.

However, I have noted Recon's proposed public meetings to be held in Windhoek on Tuesday 2nd February (ie after the deadline for written submissions). I personally was also denied access to local consulations via livestream. Apart from that, I reckon that - due to CoVid restrictions - consultations couldn't have taken place in a manner that would have allowed access and participation on a much larger scale for interested and affected parties.

I therefore also ask for the deadline for written submissions and public consultations to be extended until CoVid restrictions have been lifted.

Please don't hesitate to get back to me with any question that might occur.

My best regards

Andy Gheorghiu

Per email: frontdesk@rbs.com.na / smwiya@rbs.com.na
Dr. Sindila Mwiya
PhD, PG Cert, MPhil, BEng (Hons), Pr Eng
International Resources Consultant /Founder RBS CC & FGN (Pty) Ltd
Risk-Based Solutions (RBS) CC, Consulting Arm of Foresight Group Namibia (FGN) (Pty) Ltd
Investments and International Resources Technical Consultants in Petroleum/Mining/Energy/ Environmental
Assessment /Property Development/ Programmes and Projects Management/ Training/ Research
41 Feld Street Ausspannplatz
Cor of Lazarett and Feld Street
P. O. Box 1888, WINDHOEK, NAMIBIA

28 January 2021

Stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73
Shale development project of ReconAfrica in Kavango Basin

Dear Dr. Sindila Mwiya,

as a confirmed and registered stakeholder, I herewith contribute to the submission process in relation to the proposed 2D Seismic Survey Operation in PEL 73 as follows:

1. **Seismic survey represents first stage for field development – cumulative impacts need to be taken into account**

As you know, seismic surveys represent the first stage of a field development – in this case the Kavango basin where ReconAfrica wants to predominantly exploit shale oil and/or gas. The company was founded by Craig Sterbin, who – despite being the owner of shale licenses in France[1], Poland, Germany[2] and Spain[3] – wasn't able to develop shale and/or start fracking operations in Europe.

Exploratory drilling is already underway and the current proposed seismic surveys shall pave the way for more exploratory drillings. Seismic surveys are therefore an inseparable part of the exploration phase that will end up in at least one hydraulic fracturing or fracking operation.

Fracking is a crucial part of the exploration phase of oil and gas extraction. The so-called "Stimulation drilling" allows a company to ascertain if there is enough economically viable oil or gas in the underground. Once companies make that positive determination, full scale fracking will inevitably ensue. Individual applications must therefore be viewed and assessed as part of a larger plan by the companies to develop an extraction industry more broadly in the targeted regions – in this case a rural, non-industrialized arid area.

From: Andy Gheorghiu <andy.gheorghiu@mail.de>
Sent: Monday, 11 January 2021 8:51 PM
To: frontdesk@rbs.com.na; smwiya@rbs.com.na
Subject: Registration as interested party for EIAs related to Recon Africa

Dear Madam / Sir, Dear Dr Sindila Mwiya,

I want to register as interested party for EIAs related to ReconAfrica's exploration/exploitation plans.

It would be great to receive a confírmation per email.

Thank you for everything in advance.

My best regards
Andy Gheorghiu

	-- **Andy Gheorghiu Consulting** Campaigner & Consultant for climate/environmental protection, energy policy & further development of democratic processes Stechbahn 9 34497 Korbach Germany **Phone: +49 5631 50 69 507** **Mobile: +49 160 20 30 974** **Twitter: @GheorghiuAndy** **Skype: andy.gheorghiu2**
154.	From: Brigitte Weidlich <weidlich@mweb.com.na> Sent: Monday, 11 January 2021 8:26 PM To: frontdesk@rbs.com.na Cc: smwiya@rbs.com.na Subject: Registration as IP for seismic survey of ReconAfrica Dear Dr Mwiya, I trust this mail finds you well - all the best for 2021. I saw your advertisement in the NEW Era newspaper about ReconAfrica wnatign to undertake a seismic survey with regard ot thier oil/gas exploration in NE Namibia. Herewith I would like to register as interested party for that ReconAfrica undertaking. Kindly also forward me the background information document (BID). Thanks in advance. Kind regards Brigitte Weidlich P.,O Box 20893 WINHDOEK

155.

From: John Hazam <jh@nnf.org.na>
Sent: Thursday, 28 January 2021 2:38 PM
To: smwiya@rbs.com.na
Subject: FW: Windhoek Meetings?

Dear Dr. Mwiya,
I represent **Namibia Nature Foundation** and registered through you earlier (11 January) as an I&AP.
Also a week ago, I emailed you again after hearing informally that Windhoek meetings were being planned (but no date or venue at that time).
I have heard through another party today that 2 sessions will be conducted at Hotel Thule on Tuesday, 2nd February.

I called Thule and they confirmed they were hosting the event but they said they were not doing the registration of places.
I would like to ensure NNF is represented by 'pre-registering' through you for Session 1 in the morning.
I was also given an number by Thule, for Karla – (081-231-7805). But she did not pick up.
Please can you direct me or ensure that I will have a **place at Session 1**
Sincerely yours,

John Hazam
Senior technical Advisor
Namibia Nature Foundation

From: John Hazam
Sent: Thursday, 21 January 2021 2:50 PM
To: smwiya@rbs.com.na
Subject: Windhoek Meetings?

Dear Dr Mwiya,

I am hearing through the grapevine that there will be a meeting in Windhoek. If so can you notify me of the date.

Best, John Hazam, NNF

From: John Hazam <jh@nnf.org.na>
Sent: Monday, 11 January 2021 3:24 PM
To: frontdesk@rbs.com.na; smwiya@rbs.com.na
Subject: Kavango Seismic Survey

Dear RBS and Dr. Mwiya,

I am John Hazam, Senior Technical Advisor for the Namibia Nature Foundation. On behalf of NNF I would like to register as an I&AP. NNF has had and continues to have a number of projects in the Kavango Regions, and we have an office and staff based in Rundu.

I am based in Windhoek, but travel monthly to different projects across Namibia. [By chance I just agreed to a tentative date for my next visit to the region in late January.]

Would you please confirm NNF's registration as an I&AP and send me the Background Information Document.

Some Comments on Proposed 2D Seismic Survey in Kavango West and East

Namibia Nature Foundation

The Namibia Nature Foundation among many other environmental projects throughout Namibia, has supported a number of community projects, largely through Community Forests and Conservancies in the 2 Kavango Regions for many years. Some of the comments below come especially from that perspective.

1.2.1 "a minimum of 2 wells"
A. What indicators or criteria might lead to more than 2 wells being drilled?
B. What indicators or criteria might lead to no seismic survey? [5.3.2 (vi) – No-Action Alternative]

1.3.2 2D Seismic Survey Influences on Local Communities
A How are the communities along the survey lines going to be consulted? [in order to avoid fear of strange activities, and to avoid innocent or ignorant tampering of the geophones]
B Community Forests and Conservancies are organized community institutions established by government with an interest and mandate in the environment and should be formally consulted.

1.4.4 Location of Proposed 2D Seismic Survey Lines
A None of the Figures label Conservancies – though some constituencies and some Community Forests are indicated. (Figure 1.5 & 1.6 seem to indicate seismic survey lines along George Mukoya Conservancy for instance)
B The legend on some figures is incomplete – what are the differences between solid lines and dotted lines, and lines of different colours (for instance Figures 1.4 – 1.7)
C The list of regional and traditional authorities along the proposed survey lines should be expanded to include Community Forests and Conservancies which are organized community institutions established by government with an interest and mandate in the environment and should be formally consulted.

2.3.3.1 Proposed Survey Design and Layout
A The legend is incomplete [see 1.4.4 A & B above]

2.3.3.2 Proposed Seismic 2D Ground Survey Implementation Stages
A. There must be adequate consultation with local communities along the survey lines [see 1.3.2 A & B, and 1.4.4 C above]

2.4.2 Fly Camp Site
[See 2.3.3.2 A above]

	My contacts: John Hazam Cell – 081-396-3626 Office – 61-248-345 Email - jh@nnf.org.na
156.	From: Christopher Brown <ceo@n-c-e.org> Sent: Monday, 11 January 2021 10:59 AM To: frontdesk@rbs.com.na; smwiya@rbs.com.na Cc: NCE Admin <admin@n-c-e.org> Subject: Proposed 2D seismic survey in petroleum exploration license area No. 73 - Kavango regions Dear Sir or Madam, I would hereby like to register as an interested and affected party on the EIA for the proposed 2D seismic survey in petroleum exploration license area No. 73 in the Kavango regions as advertised by your company (see attached). I would be grateful if you would send me the Background Information Document (BID) for this initiative. Kind regards, Chris Dr Chris Brown 20 Nachtigal Street, Ausspannplatz, Windhoek PO Box 40723, Ausspannplatz, Windhoek, Namibia Tel: +264 (0)61 240 140 NCE Mobile: +264 (0)81 162 5807 e-mail: ceo@n-c-e.org www.n-c-e.org
157.	**From:** Jan Arkert <jan@africaexposed.co.za> **Sent:** Thursday, 28 January 2021 3:25 PM **To:** 'Dr Sindila MWIYA' <frontdesk@rbs.com.na> **Cc:** timoteus.mufeti@met.gov.na **Subject:** 2D Seismic Survey Draft Scoping Report Submission **Importance:** High Dear Dr. Mwiya I have attached a copy of my submission with comments and objections to the proposed 2D Seiesmic Survey in Kavango Namibia. I trust that you will peruse my report and consider the comments and objections that I have included. Please acknowledge receipt of this email.

	Regards **Jan Arkert** Pr.Sci.Nat C: 083 656-0900 F: 086 633-7332 From: Jan Arkert <jan@africaexposed.co.za> Sent: Monday, 11 January 2021 10:28 AM To: 'Dr Sindila MWIYA' <frontdesk@rbs.com.na> Subject: [SPAM]Kavango Seismic Survey Importance: High Good morning Dr Mwiya As a registered IAP (see trailing email below), I am interested to find out about the status of the EIA for the proposed 2D and 3D seismic survey that ReconAfrica propose carrying out in the PEL 73 licence area. Despite my previous email of 17th December 2020, which I received a delivery and read receipt, you have selected not to respond. I have the same rights as all other IAP's and therefore expect to be treated with the same respect. I am aware that your company has been appointed to conduct the said EIA, and I would appreciate it if you could keep me abreast of developments, and wish to know what the arrangements are for the public participation process for the Draft Scoping Report I trust that you will reply to my request for information Jan Arkert Pr.Sci.Nat C: 083 656-0900 F: 086 633-7332
158.	**From:** Jessica Kemper <jkemper01@gmail.com> **Sent:** Thursday, 28 January 2021 8:10 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: NEWS comments on draft scoping report re 2D seismic survey operation in PEL 73 Dear Dr. Mwiya, thank you very much for the feedback. We look forward to the Draft EIA/EMP documents and the specialist reports when they become available. Jessica On Thu, Jan 28, 2021 at 6:46 PM Dr Sindila MWIYA <frontdesk@rbs.com.na> wrote: Dear Dr Kemper, Thank you very much for your contributions / inputs. They are highly appreciated. We will update you once the Draft EIA, EMP and specialist reports are released for public review.

	Many thanks, **Dr. Sindila Mwiya** Dear Sindila, apparently ReconAfrica is planning two public meetings in Windhoek regarding the above-mentioned planned project, as per request by various stakeholders, including the Namibian Environment & Wildlife Society (NEWS). The NEWS therefore requests that these meetings be held as online meetings (or at least offer the opportunity for active online participation) in order to cater for covid-related restriction and to allow out of town stakeholders to take part. I look forward to your feedback, including an announcement of the date(s) on which the two meetings will take place. Regards, Jessica Dr. J. Kemper Committee Member Namibian Environment & Wildlife Society PO Box 3508, Windhoek 76/78 Frans Indongo St Windhoek Namibia Office: 061306450 Cell (J Kemper): 0813231110 **From:** Jessica Kemper <jkemper01@gmail.com> **Sent:** Monday, 11 January 2021 7:49 AM **To:** Risk-Based Solutions (Dr. Sindila Mwiya) <smwiya@rbs.com.na>; Dr. S. Mwiya (RBS-Foresight Group) <frontdesk@rbs.com.na> **Subject:** Fwd: Seismic survey EIA for Reconnaissance Energy Africa in the Kavango Basin area Dear Sindila, as per my previous two email requests of 17 December 2020 and 23 December 2020, I would like to register on behalf of the Namibian Environment & Wildlife Society (NEWS) as an IAP for the proposed 2D seismic survey planned for PEL No. 73 in the Kavango Basin for which you are undertaking the EIA. Our registration details are: Dr. Jessica Kemper Committee Member Namibian Environment & Wildlife Society PO Box 3508, Windhoek 76/78 Frans Indongo St Windhoek Namibia Office: 061306450 Cell (J Kemper): 0813231110 Please confirm that the NEWS has been registered and kindly forward me any background information that is available at this stage.

	Thank you in advance and regards, Jessica
159.	**From:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Sent:** Wednesday, 3 February 2021 8:01 PM **To:** 'Samson Mulonga' <mulongas@gmail.com> **Cc:** 'shakwa@shakwanyambeinc.com' <shakwa@shakwanyambeinc.com>; 'Claire Preece' <claire.preece@ReconAfrica.com>; 'Yuri Perez' <yuri.perez@pioneeroilgas.com> **Subject:** RE: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia **Importance:** High Dear Samson, I was present at the said Rundu meeting, made a presentation and I never head Recon Team (Claire or Yuri) admitting to the statements as included in the attached submission and in your email communication below which I assume are both the official inputs and position of WWF Namibia. Please note that I have copied the ReconAfrica legal counsel and team that was present at the said meeting in Rundu on the matter because your email below and submissions that you are saying that is based on facts will need to be fully qualified as requested in my email below. I am sure there are official minutes for this meeting that took place in Rundu. Many thanks, **Dr. Sindila Mwiya** **From:** Samson Mulonga <mulongas@gmail.com> **Sent:** Wednesday, 3 February 2021 5:31 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia Dear Dr. Mwiya The statement is based on the fact that the public participation for the first EIA for drilling was limited to two meetings in Rundu and Nkurenkuru and there were no consultations and engagements with CBOs and communities on the ground. Subsequently you were present at the stakeholder meeting in Rundu where the minister of MME engaged the CBOs and other stakeholders and this was raised at that meeting. Feedback from CBOs who attended that meeting indicates that there was admission from the Recon team that consultations should have taken place in the villages and stakeholders such as conservancies and community forests should have been consulted. In contrast your 2D seismic survey EIA consultation process has been robust and you have had meetings and engaged with communities and I am impressed you agreed to have engagements with stakeholders in Windhoek and I must admit you handled the situation better with the seemingly visibly unsettled audience. This is what the statement means. Thank you very much. Samson On Wed, Feb 3, 2021 at 2:55 PM Dr Sindila MWIYA <frontdesk@rbs.com.na> wrote: Dear Samson,

Thank you for your email and attached submission. Before I can provide feedback to your submission and email may you please qualify your statements as quoted below in your Background Submission:

This follows the preparation of an environmental impact assessment (EIA) that was extremely limited in scope and where, by the company's admission, the follow-up consultation process was flawed and failed to reach key stakeholders including local communities. Subsequently, the company has commissioned another EIA for the 2D seismic testing in the basin which will lead to identification of further drilling sites.

Please also provide evidence of the company's admission you are referring to.

Many thanks,

Dr. Sindila Mwiya

From: Samson Mulonga <mulongas@gmail.com>
Sent: Tuesday, 2 February 2021 6:03 PM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Cc: smwiya@rbs.com.na
Subject: Re: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia

Dear Dr. Mwiya

Thank you very much for sharing the scoping report and for the presentations today during the PP meeting for the 2D seismic survey. I couldn't get in as by the time I arrived it was already full. However please find attached the WWF Namibia statement which encourages the Strategic Environmental Assessment. While watching online one lady towards the end of the session asked if a SEA would be done and you responded that Recon will look into it. Is this something you think is possible? with maybe MEFT driving it?

We feel a SEA is the best way to go for all involved (Recon, government, stakeholders and communities).

Regards

Samson

Oil and Gas drilling in Kavango: the case for a Strategic Environmental Assessment.

02-02-2021

Background

Reconnaissance Energy Africa Ltd has commenced drilling operations on the first well (6-2), of an initial three well program, in the deep Kavango Basin in the Kalahari Desert of North East Namibia. This follows the preparation of an environmental impact assessment (EIA) that was extremely limited in scope and where, by the company's admission, the follow-up consultation process was flawed and failed to reach key stakeholders including local communities. Subsequently, the company has commissioned another EIA for the 2D seismic testing in the basin which will lead to identification of further drilling sites.

The case

The company is taking the approach that decisions on further test drilling would only be taken on the basis of the seismic testing, and decisions on the extent and method of extraction would only be taken on the basis of test drilling. Based on this approach it will only assess environmental impacts in a stepwise fashion.

However, given the potential scale of the operation, the size of the Kavango basin, its complex hydrology, and the worst-case scenario for long-term impacts if, for example if hydraulic fracturing (fracking) is employed, this stepwise approach to assessment of the impacts is not satisfactory and does not comply with best practice. Major economic and political difficulties could ensue if, for example, it is discovered late in the process - when considerable resources and political capital have already been committed - that there are potentially serious risks to biodiversity, water security quality and the welfare of local rural communities.

It is submitted, therefore, that the interests of conservation, of local communities, of the relations between Namibia and its neighbours and of the company will be best served by conducting a strategic environmental assessment (SEA), carried out according to international standards and subject to independent review. Such a SEA would provide much more certainty on the following points of concern:

From: Samson Mulonga <mulongas@gmail.com>
Sent: Sunday, 10 January 2021 10:20 PM
To: frontdesk@rbs.com.na
Cc: smwiya@rbs.com.na
Subject: Registration as an IAP for the EIA for 2D seismic survey

Dear Dr. Mwiya

I would like to register as an IAP for the EIA for the 2D seismic survey as advertised in the papers.

Regards

Samson

160.	**From:** earthl@iway.na <earthl@iway.na> **Sent:** Thursday, 28 January 2021 12:34 PM **To:** Sindila Mwiya, Dr <smwiya@rbs.com.na>; frontdesk@rbs.com.na **Cc:** Timoteus Mufeti <Timoteus.Mufeti@meft.gov.na>; Percy Misika <ED@mawf.gov.na>; ReconAfrica <admin@reconafrica.com>; Bertchen Kohrs <earthl@iway.na> **Subject:** Comments_Earthlife Namibia_Draft Environmental Scoping Report for the Proposed 2D Seismic Survey by ReconAfrica **Importance:** High Dear Dr Sindila Mwiya, Attached please find comments from Earthlife Namibia on the Draft Scoping Report for the Proposed 2D Seismic Survey. Kind regards, Bertchen Kohrs Earthlife Namibia Mobile: 081 2938085 From: earthl@iway.na <earthl@iway.na> Sent: Saturday, 9 January 2021 8:40 PM To: Sindila Mwiya, Dr <smwiya@rbs.com.na> Cc: Bertchen Kohrs <earthl@iway.na> Subject: Please register Earthlife as I&AP for oil exploration Dear Dr Sindila Mwiya, I kindly ask you to forward me the form to register as I&AP for the oil exploration project by ReconAfrica. Thank you and kind regards, Bertchen Kohrs Earthlife Namibia Earthlife Namibia Date: 28 January, 2021 Inquiries: Bertchen Kohrs Dr. Sindila Mwiya Director of Risk-Based Solutions Cc: Mr Timoteus Mufeti Environmental Commissioner Ministry of Environment, Forestry & Tourism Mr Percy Misika Executive Director Ministry of Agriculture, Water & Land Reform ReconAfrica Re: "Draft Environmental Scoping Report for the Proposed 2D Seismic Survey" Please receive comments from Earthlife Namibia on the above-mentioned report. Earthlife is grateful for the generous assistance of an experienced scientist. 1. By its own admission, Dr. Sindila Mwiya of Risk-Based Solutions has been active since 2010 as an industry specialist to petroleum exploration companies in Northern Namibia, for more than 10 years. It is thus highly questionable if he is fit as the independent and unbiased Environmental Practitioner as required by law in Namibia. 2. Your timing seems strange to us. Usually, a seismic survey is done as part of the pre-drilling, not AFTER initial drilling has occurred. The purpose of the seismic survey is to determine where to drill next. Even in the 2D seismic survey application (pg. 9), you yourself stress that seismic is the first step, followed by exploratory drilling. Can you explain that to us?
161.	From: Josephine Amwaalwa <josephineamwaalwa@gmail.com> Sent: Friday, 8 January 2021 8:16 AM To: frontdesk@rbs.com.na Subject: Registration as an Interested Party in the 2D Seismic Survey Dear Sir/Madam I hope this email finds you well. I am writing to register as an interested party for the proposed clearance certificate for the 2D seismic survey by the company Reconnaissance Africa, in the petroleum exploration (PEL) No. 73,Kavango Basin, Kavango West and East Regions, Northern Namibia. Compliments for the new year. Regards, Josephine Amwaalwa

Annex 3-7- Combined Stakeholders Submissions

March 2021

SCHINDLERS

attorneys and notaries

RECONNAISSANCE ENERGY AFRICA LTD
c/o Pioneer Oil and Gas Consulting
City View Building Unit 13,
Cnr of Pasteur & Freud Street
P.O. Box 2393,
Windhoek, Namibia
admin@reconafrica.com

Our Ref: E01180
Date: 29 January 2021

RISK-BASED SOLUTIONS (RBS) CC
Cnr of Lazarett and Feld Street
P.O. Box 1839,
Windhoek, Namibia
smwiya@rbs.com.na

DEPARTMENT OF ENVIRONMENTAL AFFAIRS
OFFICE OF THE ENVIRONMENTAL COMMISSIONER
Phillip Troskie Building
Windhoek
Namibia
timoteus.mufeti@met.gov.na

***** PER EMAIL ATTACHMENT *****

***** ATTENTION: DR. SINDILA MWIYA *****

Dear Sir,

RE: COMMENTS AND OBJECTIONS TO THE DRAFT SCOPING REPORT FOR PROPOSED 2D SEISMIC SURVEY IN PEL 73, KAVANGO BASIN, BY RECONAFRICA

1. In this document, Schindlers Forensics ("**Schindlers**") submits comments and objections in their own name and on behalf of Interested and Affected Parties and Communities within the jurisdiction the proposed 2D seismic project is intended to occur, in response to the *Draft Scoping Report to Support the Application for Environmental Clearance Certificate (ECC) for the Proposed 2d Seismic Survey covering the Areas of interest (AOI) in Petroleum Exploration Licence (PEL) No. 73, Kavango Basin, Kavango West and East Regions, Northern Namibia, Volume 1 of 3* ("**Draft Scoping Report**"), as proposed by

Reconnaissance Energy Namibia (Pty) Ltd and compiled by Risk Based Solutions ("**Risk Based Solutions**") and the environmental assessment practitioner ("**EAP**") Dr. Sindila Mwiya.

2. Therefore, all the comments, suggestions, and/or recommendations made herein will refer to the Draft Scoping Report.

3. Our overall submission is that there should be an immediate withdrawal of the ECC issued to ReconAfrica for all petroleum exploration activities in Kavango, Namibia. Our main submissions are summarised below:

   3.1. The Draft Scoping Report fails to adequately and clearly consider the potential and/or actual impacts of the proposed project on climate change, biodiversity, ecosystem services, and indigenous and local communities' values and rights.

   3.2. The EAP does not appear to have any academic environmental qualifications, and further appears to have a career intrinsically linked with the oil and gas industry. Which brings into question whether the EAP has the requisite authority and expertise to prepare the Draft Scoping Report, and make the submissions therein, and further brings into question his impartiality and objectiveness in preparing same.

   3.3. It is unclear whether RBS has any conflict of interest in preparing this report, and the submissions made therein.

   3.4. The requirements for public participation have not been properly complied with, in terms of the Environmental Impact Assessment Regulations: Environmental Management Act, 2007 ("**EIA Regulations**").

   3.5. The Draft Scoping Report is contradictory, overly broad, and exceeds its mandate, in sections.

   3.6. The Draft Scoping Report, and the project as a whole, evinces a clear threat to Article 95 of the Namibian Constitution.

FAILURE TO CONSIDER POTENTIAL IMPACTS

4. The Draft Scoping Report fails to adequately and/or clearly consider the negative impacts of the proposed project on the environment, biodiversity, and climate change, in that it, *inter alia*:

4.1. Fails to give regard to current best practices as advised by the Intergovernmental Panel on Climate Change ("**IPCC**") as per the IPCC Special Report of 2018. While the Draft Scoping Report mentions, in passing,[1] that climate change is an issue to be resolved in the next few decades, the proposed project is in blatant contradiction of the IPCC current best practices which highlights the urgent need to reduce emissions and prevent a global average temperature increase over 1.5°C by 2030.

4.2. There is no substantive consideration given to the Paris Climate Agreement,[2] of which Namibia is a signatory. The Draft Scoping Report fails to address or discuss any negative environmental and socioeconomic impact which may occur should the proposed project proceed, and ReconAfrica begin oil and gas production in Namibia. The EAP makes multiple broad statements about the *possible* future economic benefits of the proposed project,[3] yet fails to mention the negative socioeconomic and environmental impact. Considering the scope of the Paris Climate Agreement and the IPCC Special Report, by not identifying and discussing the same, the EAP and RBS have failed, *alternatively* neglected, and/or *further alternatively* refused to address the environmental issues which are related to the proposed project.

4.3. The Draft Scoping Report fails to identify the actual risks of the proposed project and the risk of oil and gas production on the groundwater of the area, and the potential contamination thereof.

4.4. The Draft Scoping Report argues that there may be current and future negative impacts on the receiving environment if petroleum exploration does not occur, however, while the EAP speculates as to these potential negative impacts from 'normal' indigenous and local communal life, the EAP fails to give the same consideration to the negative environmental impacts of oil and gas production which would ultimately affect the aforementioned indigenous peoples' normal life. failure seems to indicate that the EAP views only the indigenous and local community as negative (which also highlights a lack of impartiality).

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[1] See paragraph 1.3.3, page 6, of the Draft Scoping Report
[2] Ratified on 21 September 2016.
[3] See for example, paragraph 1.3.3, page 5, of the Draft Scoping Report.

4.5. The United Nations Declaration on The Rights of Indigenous Peoples ("**The Declaration**") was also, clearly, not considered when the Draft Scoping Report was submitted. Of which specific importance pertains to all Articles of the aforementioned Declaration in regard to indigenous people. The link to the Declaration inserted here for your ease of reference: www.un.orgUNDRIP_E_WEB.

4.6. While there is a mention in the Draft Scoping Report that a desktop study was conducted on the fauna and flora of the area,[4] the EAP has failed to identify the details of the alleged specialist who conducted this study and has failed to make the study available. Furthermore, while indication is also made to the fact that fieldwork was conducted, again the above is not provided.

4.7. While some endangered, and at risk, species of fauna and flora are identified there is little to no regard given to the impact that the proposed project will have on such species. Further, the EAP displays an apparent disregard toward the effect of the project on elephants in the greater area, and while comment is made on the fact that elephants communicate through low frequency vocalisations (generally 14 Hz to 35 Hz)[5], the Draft Scoping Report fails to indicate what the frequency range and amplitude of the accelerated drop weight, which is intended to be used for the 2D seismic survey. The failure to identify this frequency is a critical failure in identifying the potential impact on elephants in the area.

EAP AND RBS

5. The EAP, in his comprehensive statement of qualifications, displays a career intrinsically linked to the oil and gas industry. His career history evidences a potential lack of impartiality, this coupled with the focus on speculative positives in the Draft Scoping Report with an apparent disregard for the negative and the dismissive comments of the affected environment and people, evinces that the EAP has not sufficiently, in an objective and unbiased manner, prepared the Draft Scoping Report.

6. In addition, the EAP does not appear to have any environmental qualifications, academic or otherwise, as would be part of the expected requisite expertise required to compile an expert report on the environmental impact of any project akin to the proposed project. Furthermore, the EAP (which his background specialising in

[4] See paragraph 4.3.1, page 76, of the Draft Scoping Report.
[5] See paragraph 5.4.2.2, page 101, of the Draft Scoping Report.

geotechnical engineering) makes a number of statements in the Draft Scoping Report which are beyond his expertise.

7. The EAP's apparent lack of expertise in environmental impact, a career intrinsically linked with the oil and gas industry, alongside the below extract from Risk Based Solutions (RBS) website www.rbs.com.na accessed on 28 January 2021, displays the apparent failure of impartiality and objectiveness as required by an EAP in preparing an environmental assessment:

About Us

Founded in 2004, Risk-Based Solutions (RBS) CC, Reg. No., CC/2004/1305, is the consulting arm of Foresight Group Namibia (FGN) (PTY) LTD. Both RBS and FGN are Namibian local owned companies established with the objective to meet the demand and for the promotion of Local Knowledge-Based Solutions (LKBS) in the following investments and consultancy portfolios of our specialisation:

- Minerals Exploration and Mining
- Petroleum (Oil and Gas)
- Energy (Solar, Wind and Thermal)
- Tourism Investments and Experiences
- Property Development and Management
- Waste Management
- Environmental Assessments (EIA, EMP, SEA, SEMP)
- Geological (Geoenvironmental and Geotechnical)
- Engineering Programme and Project Management and Logistics
- Specialised Training and Industry Research

8. In terms of the EIA Regulations the EAP must have knowledge of and experience in conducting the relevant assessment,[6] is submitted that the EAP, Dr. Mwiya, should remove himself from the process.

9. It should be noted that RBS, and/or the EAP, have failed to include any declaration within the Draft Scoping Report as to potential conflicts of interest and/or their independence in the process.

10. According to the EIA Regulations the EAP must:[7]

> (b) perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
>
> …

[6] Section 4(a) of the EIA Regulations
[7] Section 4(b) and (d) of the EIA Regulations

(d) disclose to the proponent, competent authority and the Environmental Commissioner all material information in the possession of the EAP that reasonably has or may have the potential of influencing –

(i) any decision to be taken with respect to the application in terms of the Act and these regulations; or

(ii) the objectivity of any report, plan or document to be prepared by the EAP in terms of the Act and these regulations.

11. It is apparent from the above extract, and the information highlighted above, that the EAP and RBS do not properly comply with these legislative requirements and further evidence the high potential of a biased and unobjective report.

PUBLIC PARTICIPATION

12. According to the EIA Regulations, it is required that the EAP attends to:[8]

> advertising the application once a week for two consecutive weeks in at least two newspapers circulated widely in Namibia

13. While the Draft Scoping Report notes that there was a public notice published in the New Era newspaper, on or about 7 January 2021, this is the only paper noted in which the notice was published. This is a clear contravention of the requirement that the notice must be advertised in ***at least two*** widely circulated newspapers.

14. It is possible for the publication requirements to be deviated from at the discretion of the Environmental Commissioner, however, there is no indication in the Draft Scoping Report that the Environmental Commissioner has made any such agreement, and thus the process followed by the EAP is procedurally flawed.

15. It does not appear that the EAP or RBS have taken into consideration, or taken steps to implement, virtual public participation hearings or being reasonably considerate and indulgent with regard to timelines for public participation given the very real impact and threat of the current global corona virus pandemic. In light of this pandemic, the fact that many people (including interested and affected parties and members of the indigenous and local community) are either unable to attend such participations due to being prevented from travelling internationally and/or due to the very real health risks of this

[8] Section 21(2)(c) of the EIA Regulations

pandemic. As such it is apparent that the EAP and RBS have failed to reasonably take into consideration the substantive requirements of public participation.

VAGUE, OVERLY BROAD, AND CONTRADICTORY

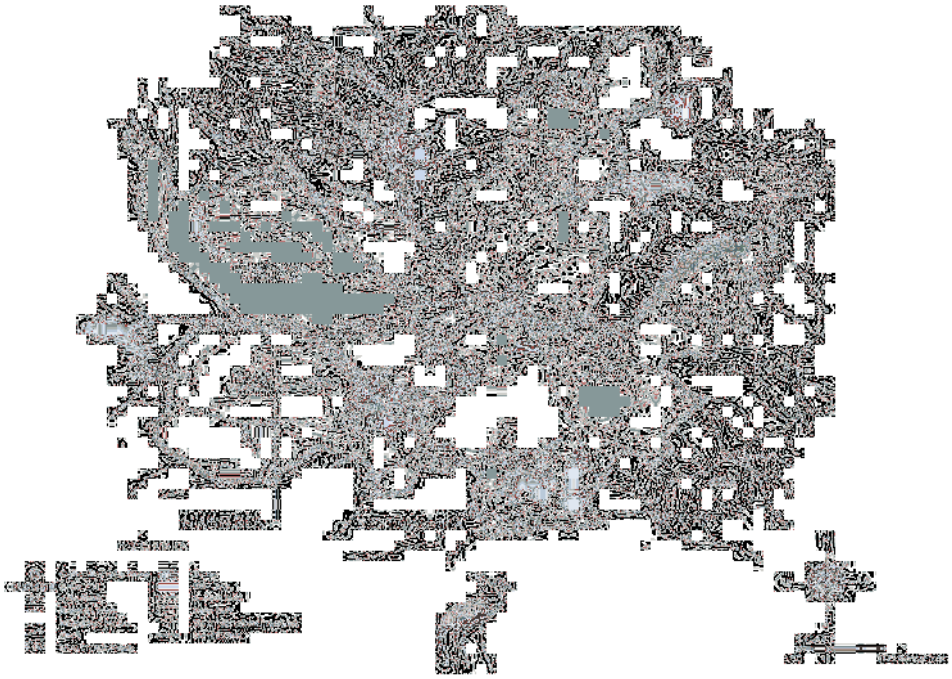
16. The Draft Scoping Report is fatally flawed in its failure to properly address the issues which would reasonably be expected to be addressed, specifically all reasonable impacts of the proposed project (**both** positive **and** negative) and a quantification and qualification of how the proposed project's impact will be evaluated.

17. In addition to the information discussed above, the EAP makes submission that there is no purpose in discussing the real and potential risks of conventional and/or unconventional oil and gas production (which is the obvious expectation of the applicant) as "one cannot measure the unknown".[9] Yet, the EAP finds it appropriate to measure the unknown with regard to supposed socioeconomic benefits to Namibia and its people,[10] as well as the unsubstantiated statements with regard to the effect of 'normal' indigenous and communal life on the environment (as discussed above).[11]

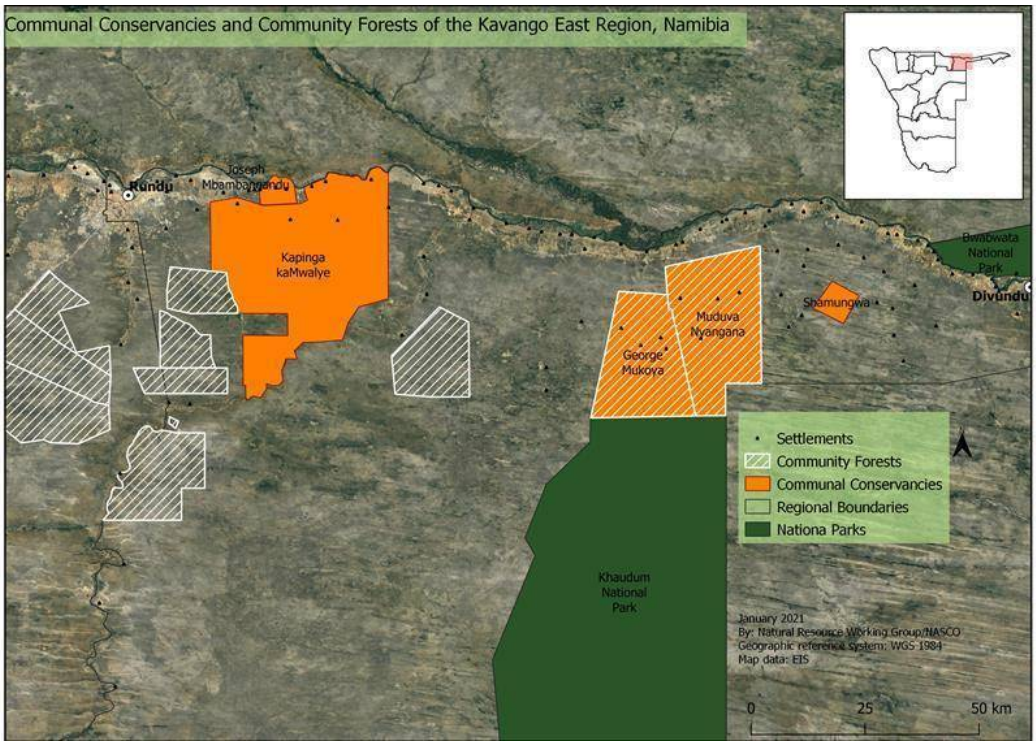
18. The Draft Scoping Report makes numerous statements that the receiving environment and area of interest for the proposed project is far/well-enough removed from areas such as the Okavango Delta, Okavango River, Tsodilo Hill, Khaudum National Park and Mangetti National Park.[12] However, no mention is made to whether the proposed exploration area falls within any conservation areas (either nationally or internationally recognised.

19. From a brief internet search, one can clearly see that the proposed exploration area falls within the internationally recognised Kavango Zambezi Transfrontier Conservation Area ("**KAZA TFCA**")[13], as seen from the maps below:

[9] See paragraph 1.3.4, page 6, of the Draft Scoping Report.
[10] See paragraph 5.4.1, page 100, of the Draft Scoping Report.
[11] See, for example, paragraph 4.2.2, page 75, of the Draft Scoping Report.
[12] See paragraph 1.4.3., page 7, of the Draft Scoping Report.
[13] The KAZA TFCA is a multi-national initiative between Angola, Botswana, Namibia, Zambia, and Zimbabwe, with the intention of establishing a treaty for the conservation and sustainable management of the Kavango Zambesi ecosystem, with a focus on best practices for environmental and socioeconomic benefit.



20. It is also apparent from the above images that there are a number of conservancies, and protected areas, none of which are adequately included in the report if at all. Furthermore, the Draft Scoping Report fails to identify and discuss a number of communal conservancies which are in close proximity to the areas of interest, some of which are identified in the below map:



21. It is evident that the proposed project, and any petroleum exploration activities, within KAZA TFCA will have a definite impact on the area, and have potential implications on international relationships and this multi-national initiative. Therefore, it is evident that the Draft Scoping Report is incomplete and fatally flawed in that it has not properly and clearly discussed the implications on clearly relevant areas.

22. The Draft Scoping Report provides a number of tables which are (presumably) intended to be used to quantify the effect and nature of the proposed project on the receiving environment.[14] However, these tables are not consistent with each other, and more importantly it is not explained how this grading will be qualified and achieved. It appears to be an arbitrary oversimplified measure, which indicates that any outcome thereof could be equally arbitrary and potentially and intentionally result in biased results.

23. It should be noted that there appears to be irrelevant information and sections provided in the Draft Scoping Report, the purpose of which can be presumed to mislead and overwhelm the reader with superfluous information.[15]

[14] See Table 5.4 to 5.8, pages 107-109, of the Draft Scoping Report.
[15] For example, see paragraph 3.2.2, page 60, of the Draft Scoping Report where the EAP provides and explanation on how to obtain a petroleum exploration licence, which is irrelevant to an environmental impact assessment and to the proposed seismic project.

24. Without derogating from the above, it should be noted that ReconAfrica have failed to adhere to best international and national practices with regard to drilling,[16] as shown in the below image of an unlined waste pit in Kawe, Kavango East:

25. The failure of the EAP to consider the above (as evidence of clear negative consequences should the proposed project proceed) while taking the time to list numerous unrelated projects in Namibia, only further displays a lack of impartiality and/or negligence in the preparation of the Draft Scoping Report.

ARTICLE 95 OF THE NAMIBIAN CONSTITUTION

26. Article 95 of the Namibian Constitution, provides that the State must:

> …actively promote and maintain the welfare of the people [which *inter alia* includes]
> …

[16] Such conduct is a violation of the obligations imposed in section 38(2) of the Petroleum (Exploration and Production) Act.

(ii) maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both future and present…

27. It is clear from the comments made in this report that the proposed project, to which this Draft Scoping Report is clearly intended to promote, poses a significant and real threat to, *inter alia*, Article 95 of the Namibian Constitution.

28. Furthermore, the Human Rights element contained within Articles 5,6,7 and 8 (*inter alia*) of the Namibian Constitution were not considered, to any degree, within the Draft Scoping Report. This submission is made based on the public participation processes and assertions made, within the Report, which does not canvass a clear protection of indigenous and local communities' rights to protection of life, protection of liberty and respect for human dignity. The public participation processes, that have been held, in and of themselves limit the amount of people allowed to attend and no virtual presence has been accepted even in light of a global pandemic.

CONCLUSION

29. It is therefore submitted, without reservation, as a result of the apparent bias of the EAP and the unexplored threat to the environment, the people, and the biodiversity of Namibia, as well as the undeniable exacerbating threat of oil and gas industry on climate change, that the proposed project immediately be withdrawn and denied.

30. Furthermore, it is submitted that the ECC issued to ReconAfrica be withdrawn for any and all petroleum exploration activities in Kavango, Namibia.

31. Lastly, it is submitted that a thorough and comprehensive environmental assessment, by impartial and unbiased experts in the field, be conducted to evaluate *inter alia* the impact of any/all oil and gas activities and/or production within PEL 73, and the results thereof be made publicly available.

Yours Faithfully,

PER: DIVINA NAIDOO OBO SCHINDLERS ECOFORENSICS

Earthlife Namibia

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Date: 28 January, 2021
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Dr. Sindila Mwiya
Director of Risk-Based Solutions

Cc **Mr Timoteus Mufeti**
Environmental Commissioner
Ministry of Environment, Forestry & Tourism

Mr Percy Misika
Executive Director
Ministry of Agriculture, Water & Land Reform

ReconAfrica

Re: "Draft Environmental Scoping Report for the Proposed 2D Seismic Survey"

Please receive comments from Earthlife Namibia on the above-mentioned report. Earthlife is grateful for the generous assistance of an experienced scientist.

1. By its own admission, Dr. Sindila Mwiya of Risk-Based Solutions has been active since 2010 as an industry specialist to petroleum exploration companies in Northern Namibia, for more than 10 years. It is thus highly questionable if he is fit as the **independent and unbiased Environmental Practitioner** as required by law in Namibia.

2. **Your timing seems strange to us**. Usually, a seismic survey is done as part of the pre-drilling, not AFTER initial drilling has occurred. The purpose of the seismic survey is to determine where to drill best. Even in the 2D seismic survey application (pg. 5), you yourself stress that seismic is the first step, followed by exploratory drilling. Can you explain that to us?

3. It is also noteworthy that you apply only **for 2D seismic survey** as compared to the more applicable and informative 3D seismic survey. A 2D seismic survey is cheaper and faster but yields less reliable results with a lower resolution. The price difference is not much. Why that choice?

4. The exploration plan was approved in 2015. The plan now, **5 years later**, is for 250 km of 2D lines until January 2022. The basin is believed to be 3-4 km deep (pg. 7). You propose to use exclusively existing roads and tracks and not to cut lines into the bush. The resulting patchwork of 2D seismic lines makes interpretation very sketchy (see map on pg. 10). You state that the seismic survey is only to be undertaken within the boundaries of the *Areas of Interest* (AOI), but actually the lines cover the entire Namibian part of the concession area far outside the currently defines AOI (see maps on pg. 11 and 12).

5. The document contains **loads of information not typically required** in a Draft Scoping Report. It is thus artificially blown out of proportion by the usual copy-and-paste methods from various documents. The result is a **confusing document**, lots of typographical, grammatical and editing errors and incomplete sentences (striking examples in §3.3, pg. 66-67). In addition, non-related issues are discussed at length which have no relevance for the current application (example pg. 71-72).

6. The study **on flora and fauna diversity is very sketchy** and does not include relevant and important to data on the endangered species occurring in the area and the need for biodiversity protection. This will have to be part of the proper EIA document to follow.

7. The report does not mention that the exploration sites are within the **Kavango-Zambezi Transfrontier Conservation Area**, generally known as KAZA (Earthlife apologises if this has been overlooked). KAZA includes land in Angola, Namibia, Botswana, Zambia and Zimbabwe. The park was declared as a protected area for its rich biodiversity and also to safeguard the livelihood of the approximately 200.000 people who live there. Here are the migration routes of elephants and many other wild animals, some of which are endangered species e.g. wild dogs. Can the proponent guarantee that the reason for the establishment of the park is respected, that the rights of people and the environment are not violated and that poaching is kept under control?

8. Major risks of seismic surveys are **increased traffic**, **human presence**, **camp disturbances**, **noise and dust emissions**. There are reports of **groundwater disturbance** by seismic surveys, especially when using dynamite. Local sources can

become contaminated and/or disrupted by shifting groundwater flow patterns induced by seismic activities. Can you rule that out?

9. One of the main impacts is **ground vibration** introduced by the selected "Explorer 860" technology. This introduces ground vibrations that can travel for many kilometres in the ground. Their impact on wildlife (e.g. elephants) at a distance has not been assessed nor is it discussed at all. You claim that the frequencies used are not easily felt by wildlife, but no details are given to back up this claim. What is frequency spectrum to be used in your 2D seismic campaign? Can leakage and migration of vibration frequencies be ruled out?

10. The objectives of the scoping report are explained, but they seem to be very similar to the objectives of a full EIA. **The key function of a scoping report seems to be overlooked.** A scoping report should identify the impacts of the proposed activity and prioritise/point out the areas of primary concern/impact and thus the key focus of the full EIA. In the report a list of impacts is presented, without any prioritisation. So, when can the EIA be expected for public scrutiny and comments?

11. It is **not clear which benchmarks** the company will adhere to. The report plainly states that all relevant legislation to be observed.

12. The company promises to apply "*Good Oilfield Practices*". This is a set of rules defined by the industry for self-monitoring. They differ from country to country and are not enforceable. Can you please elaborate on this?

13. The work on **hydrogeology** for this study is a quick resumé of earlier work and of little relevance to the current proposal. It does, however, indicate that the "Kalahari Aquifers" prevalent in the region are extensive aquifers with good lateral permeability. Thus, any activity in the *Area of Interest* will have potential hydrogeological ramifications in faraway places. Can you rule that out? Under what hydrogeological model?

14. **Groundwater**: Recent (2018) research[i] by the German BGR (Bundesanstalt für Geowissenschaften und Rohstoffe) with the Namibian Department of Water Affairs and Forestry has shown that there are substantial deep-seated groundwater resources in the area. Can you rule out that they might be affected by your campaign?

15. Oil and gas contribute to climate change and put stress on the global ecosystem. Namibia has ratified the **Paris Climate Agreement** and approved to reduce global greenhouse gas emissions.

16. The proponent promises (pg. 5) **to make the data available** to the national geoscience database held by NAMCOR. This is not usually the case as the results of surveys are commercially sensitive. Civil society will be vigilant that this promise is kept.

17. The project by ReconAfrica is of **national interest** and is not limited to the concerns of communities in Northern Namibia. We demand that proper consultations also be held in Windhoek and in other regions of Namibia.

Summary:

1. The document is (deliberately?) **confusing with lots of unnecessary data** while missing on essential items.

2. The authors are **missing the essence of a Scoping Process** and lack definition and prioritisation of issues and items for the proper EIA document.

3. The document **lacks proof-reading and proper editing**.

4. The exploration sites are within the **Kavango-Zambezi Transfrontier Conservation Area** declared as a protected area.

5. It is the **piecemeal approach to environmental licensing** that is inherent to the Namibian legislation that is the most troublesome. In this case, the much more invasive drilling has been approved without proper due diligence and public participation process, whereas the comparatively low impact 2D seismic survey which usually done before drilling, is submitted in full force. **All steps, if successful, will eventually lead to hydrocarbon production**, and in particular fracking in an incredibly sensitive environment.

We therefore register our continued opposition to the ongoing application for a licence to do a 2D seismic survey.

Yours sincerely

……..

(Bertchen Kohrs, for Earthlife Namibia)

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[i] Hydrogeology and geochemistry of a tectonically controlled, deep-seated and semi-fossil aquifer in the Zambezi Region (Namibia)

FFNB

FRACK FREE NAMIBIA & BOTSWANA

COMMENTS AND OBJECTIONS TO RISK BASED SOLUTIONS' DRAFT SCOPING REPORT FOR 2D SEISMIC SURVEY IN PEL 73 BY RECONAFRICA. KAVANGO, NAMIBIA

INTRODUCTION

Frack Free Namibia & Botswana (FFNB) is an alliance of Namibian and southern African civil society organisations and activists as well as international organisations promoting social, climate and environmental justice with more than 1030 members. We have been vocal in our resistance to the application by ReconAfrica (Pty) Ltd, a Canada-based petroleum exploration company, to explore for fossil fuels – in particular, shale oil - in Kavango East and West, Namibia and neighbouring Bostwana.

For reasons outlined below, we wish to lodge our objections to the 2D Seismic Survey that ReconAfrica proposed carrying out in the Kavango Region of northern Namibia

PUBLIC PARTICIPATION PROCESS

A public notice was placed in the New Era newspaper on 7th January 2021 inviting stakeholders and IAP's to attend the information sessions. The notice indicates that both "formal meetings" and "afternoon sessions" are to be held at Rundu on Friday 22nd January 2021, followed by field based public meetings in the area on Saturday

23rd to Monday 25th January 2021. Whilst the reasons for restrictions in numbers of attendees and times that have to be applied to these meeting are fully understood, this cannot be used as an excuse for ReconAfrica to limit public participation. Additional meetings should have been laid on at each venue to enable participants to become familiar with the project and to voice their concerns. It is apparent that approximately 75% of the time allocated was used by ReconAfrica and Risk Based Solutions and limited time was made available to IAP's to express their opinions.

Furthermore, the notice in the New Era made special mention of "specifically targeting the regional and local communities….". At the last moment the field based public meetings were cancelled, leaving many communities waiting after having travelled long distances. Not only is this totally disrespectful to the most directly affected people but also a breach of Namibian environmental legislation.
The current EIA process cannot be considered as inclusive, transparent or democratic without the voice of these communities being heard. We therefore call upon the Environmental Commissioner to cancel the current application for a clearance certificate.

Subsequently, invitations have also been extended by ReconAfrica to stakeholders to attend information sessions to be held in Windhoek on 2nd February 2021. These meetings are completely unacceptable for the following reasons;

i. PPP meetings are intended to enable IAP's to gather information and then to make an informed submission addressing objections and comments. This is clearly not possible if the meeting is held after the closure date for submissions.
ii. An extension to the closure date for submissions must be granted for a reasonable time after the Windhoek PPP.
iii. Limiting the meeting to 50 participants is understandable but it must be emphasised that for the same reasons many IAP's are not able to travel and therefore virtual meetings must be arranged on Zoom or similar.
iv. Due to the extensive international interest, the meeting must facilitate local, regional and international stakeholders. Recon has set the precedence by creating significant international exposure in their own interest.
v. The purpose of the meetings is to consult with stakeholders and IAP's. The restricted times available does not allow this process to be inclusive. At best under the current COVID restriction must allow equal time allocation between the proponent and stakeholders.

It is therefore apparent that the proponent i.e. ReconAfrica have set the schedule and timetable for the submission of this environmental impact assessment to suite their program. This is totally contrary to the intention and rational behind an EIA. It must be completed in a manner that satisfies stakeholders that all aspects of the project have been considered and that their voices have been heard and are being considered.

ENVIRONMENTAL ASSESSMENT PRACTITIONER

We wish to express our deepest concerns about Dr. Sindila Mwiya, the Environmental Assessment Practitioner (EAP). A polite request for copies of the specialist reports that are referred to in the draft Scoping Report was refused in an exceptionally rude and impolite manner. The disrespectful and unprofessional attitude displayed by Dr. Mwiya towards IAPs that oppose the proposed 2D Seismic Survey and potential future developments of an oil and gas industry in Kavango, is unacceptable and displays the EAP's lack of objectivity. It is also with keen interest that we notice the list of oil and gas related projects that Risk Based Solutions have participated in previously. This list as well as Dr. Mwiya's personal CV suggests that the objectives and aspirations of RBS appear to contradict the requirements of an EAP who is meant to be objective and impartial to the outcome of the environmental assessment.

ENVIRONMENTAL ASSESSMENT PROCESS

The staggered and disjointed EIA process does not enable an overview of the entire project to be evaluated. ReconAfrica are applying a typical "divide and conquer" type of strategy that is used to release separate aspects of the project, thereby masking the big picture. Initially an EIA was conducted for 2 exploration holes, subsequently it is for the 2D seismic survey, subsequently it will be for some other aspect, probably drilling a horizontal well and fracking for evaluation purposes. Each aspect appears to have limited socioeconomic and environmental impacts, and the cumulative impacts of the entire project are ignored.

Therefore, we demand, in the strongest terms possible, that the current disjointed EIA process is halted with immediate effect and that a transboundary Strategic Environmental Assessment (SEA) of the regional and international impacts is initiated.

FRACKING

It is critical to emphasise that the ultimate intention of ReconAfrica is to explore the Kavango Basin to determine the presence of shale based oil and gas. This fact has been displayed prominently in their presentations to investors as well as in their employment of senior personnel with extensive fracking experience. It is therefore naive to imply that this project is not about fracking as implied in the draft scoping report. It is stated that "…the derisking process covers the drilling of multiple appraisals testing wells in order to define the size of the oil and gas field discovered". In the event of unconventional shale oil and gas resources being discovered, these "testing wells" must be stimulated by means of hydraulic fracturing or fracking to determine the economic viability of progressing to a productive oil and gas play.

COMMUNITY CONSERVATION AREAS

No mention is made in the draft scoping report that two Community Conservation Areas (CCA) will be directly impacted by the proposed 2D seismic survey.

The northern portion of Seismic line NS 2 traverses through Kapinga Kamwalye Conservancy (No. 84) and also follows the eastern boundary of the southern portion of the same conservancy. Similarly, seismic line NS 3 follows approximately 25km of the George Mukoya Conservancy (No. 41) western boundary.

In a dereliction of the basic function of an EIA process, neither the community nor the chairman of the Kavango East and West Regional Conservancy & Community Forestry Association, Max Muyembu-ruko, have been consulted or notified of the intended project. When denied an opportunity to raise appropriate questions at the Rundu PP meeting, Mr Muyemburuko forwarded his questions by email. No comprehensive reply was received to the fair and legitimate questions, but rather impolite and unprofessional insults from Dr Mwiya.

It is therefore appropriate to emphasise that conservation on state and communal land in Namibia is the legal responsibility of the Ministry of Environment and Tourism (MET), and is carried out by the Ministry, by self-governing Communal Conservancies. In 1996 an amendment was made to the Nature Conservation Ordinance of 1975, which devolved rights to communities over natural resources, which includes wildlife, and established rights for communities to set up tourism enterprises. These rights are exercised through communal conservancies.

FAUNA AND FLORA

The draft Scoping Report indicates that follow up fieldwork has been carried out to supplement the desktop specialist studies that were conducted for the initial drilling EIA. No copies of the original studies were made available to IAP's and neither have copies of the field studies that were apparently conducted during November and December 2020 been made available to IAP's. Despite requests from IAP's for these reports that are already in the public domain, the requests have been refused.

The names, qualifications and experience of the specialists that have been appointed have not been disclosed in either this draft scoping report neither in the drilling EIA, which does not foster a sense of confidence in the process currently being adopted by Risk Based Solutions.

It must also be strongly emphasised that a comprehensive and inclusive fauna and flora survey cannot be conducted within the limited time allocated. From a scientific perspective, to determine the baseline presence of fauna and flora in the region the survey must consider seasonal variations which affect migrant avifauna and mammals as well as the presence of invertebrates and reptilian fauna. Variations in animals, breading seasons and cycles as well as blooming, fruiting and dormancy in plants must be considered.

Elephants vocalise by means of deep rumbles that produce seismic energy and Rayleigh waves that enable elephants to communicate over long distances. These vocalisations are in the frequency range of 15 to 30htz and include contact calls and answers and warning calls. Breeding males use infrasonic communication to locate and breed with receptive females.

The accelerated drop weight (ADW) that ReconAfrica propose using will produce seismic waves in the frequency range that elephants can detect and will inhibit communication, which will be particularly relevant in the areas adjacent to Khaudum NP and the George Mukoya Community Conservation Area where breeding herds of elephants occur in both these areas.

The ADW has not been used previously in Namibia and in particular in areas inhabited by elephant herds. It will therefore be critical that the potential impact on the resident elephant population within and adjacent to PEL 73 is fully studied and evaluated prior to the 2D seismic survey being conducted.

GROUNDWATER

The poor understanding of the potential effects of conventional and unconventional oil and gas extraction on the water resources and the poor understanding of the current state of the water resources in the Okavango basin are of biggest concerns. Allowing oil and gas extraction while these unknowns have not yet been addressed, poses a dire risk to the water resources, environment, and livelihoods of the people in the Okavango basin. The knowledge about the groundwater balance (recharge versus abstraction) in this basin, is also poor because of a lack of monitoring data for these aquifers. This makes it difficult to predict the long-term sustainable yield of an aquifer. Abstracting groundwater from the shallow aquifers for drilling and/or possible fracking in the future could cause competition with local groundwater users. And if water for drilling and/or fracking is abstracted from deeper fossil aquifers that are not significantly recharged, it could draw these deep aquifers dry. Oil and gas exploration activities can affect groundwater levels in the area and could contaminate the groundwater, which would impact the livelihoods of local communities. The groundwater in the area is especially vulnerable since the water tables are shallow (less than 30m deep) and therefore easily contaminated by surface activities.

The many scientific unknowns increase the environmental risk of oil and gas extraction in this basin, be it conventional or unconventional. For instance, the groundwater recharge mechanisms within the Omatako river basin and the wider Okavango basin is not fully understood. This is because many of the rainfall events are of relatively short duration and highly localized, which makes it difficult to sensibly quantify any hydrological response to determine aquifer recharge. Apart from rainfall intensity, a complex variety of factors, including soil conditions, the slope of the surface topography, vegetation cover, and the specific hydrogeological environment also play a role in the amount of recharge to an aquifer. Since large groundwater recharge events linked to high volume episodic rainfall in areas contaminated by oil and gas extraction, can irreparably damage the groundwater resources, it is important to develop a better understanding of aquifer recharge in this basin.

The lack of specialized baseline water studies before allowing oil and gas exploration is a serious omission. The main predicted future water resource developments in this area will be along the river systems and the associated Kalahari aquifer systems in the Okavango basin. Because groundwater and surface water resources interact, it is necessary to know what the baseline water quality of each resource is. Over the long term, this baseline information would provide reference conditions to identify any oil and gas extraction impacts on water resources.

No indication of potential surface or groundwater contamination is addressed in the draft scoping report and neither in the previous drilling EIA. This illustrates the lack of consideration applied to the cumulative impacts of the petroleum related exploration activities in the region. An absolute bare minimum requirement is to retrieve representative groundwater samples from boreholes throughout the area in order to obtain baseline data sets of current water quality.

CLIMATE CHANGE

Only limited acknowledgement is provided in the draft scoping report of climate change. No mention is made of Namibia's commitment to the Paris Agreement or the contribution of continued exploitation of fossil fuels to our collective undertaking to limit global warming to below two degrees Celsius this century.

Namibia is a signatory to the Paris Climate Agreement, which was ratified on 21st September 2016. No negative socioeconomic and environmental impacts that may accrue due to ReconAfrica's intention to bring oil and gas production to Namibia are addressed in the draft Scoping Report.

Omitting to draw attention to the significance of climate change particularly how it may impact upon marginalised rural communities is a grave dereliction. Instead, ReconAfrica and its appointed local consultants, Risk Based Solutions displayed a slide at the Rundu PP meeting on 22nd January 2021, that implied that by exploiting potential oil and gas reserves for an assumed period of 15 years, will assist Namibia to make the transformation to invest in green energy. This poor argument clearly does not consider the investment required to establish a petroleum based industry and to apply funding to the inevitable transition to renewable energy. It also blatantly neglects to heed the international urgency required to reduce greenhouse gas emissions by suggesting that the transition to green energy will be resolved over the long-term in 20 to 30 years. These statements are fabricated and need to be reconsidered particularly in-light of the commitments Namibia has made to the United Nations Framework Convention on Climate Change.

INTERNATIONAL EXTENT OF PROJECT

Dr Mwiya, in his correspondence has been dismissive of the concerns expressed about the proximity of the petroleum exploration area to the Okavango River and the Okavango Delta, a UNESCO world heritage site located downstream of the project area. It must be borne in mind that ReconAfrica created media material in which it is clearly shown that the company intends to extend their petroleum exploration activities into Botswana. The success or failures of the current exploration activities in Namibia will have a direct influence on the future

ventures in Botswana. It is therefore not prudent to exclude mention of potential impacts further afield in adjacent countries.

Even though the Omatako river system is ephemeral, it does contribute water to the Okavango river during large episodic rainfall events. Contaminants might be mobilized and transported to the Okavango river during large rainfall events. the Okavango delta is the terminal sink of the Okavango river and captures contaminants over time. This is seen from the increase in salinity of the shallow alluvial aquifers along the fringes of the delta because of the weathering of rock formations that contribute salts to the river systems that feed the delta. Organic pollutants that emanate from oil and gas extraction operations may become permanent long-term pollutants in the delta because the delta does not have an outlet to the sea.

Furthermore, the current exploration falls within the catchment area of the Kavango/Okavango River Basin that is manage by OKACOM, in a tri-nation agreement between Namibia, Botswana and Angola. It is therefore apparent that the current activities have repercussions that extend well beyond the borders of Namibia.

Despite the best efforts by ReconAfrica and Risk Based Solutions to dispel the potential risks to downstream water users and the Okavango Delta, neither party can exclude the possible negative environmental impacts. It is therefore appropriate that OKACOM must be engaged as a stakeholder and included in the environmental assessment process.

In addition to the comments made above it must be recognised that the entire petroleum exploration area falls within the boundaries of the Kavango Zambesi Trans Frontier Conservation Area (KAZA TCA). This is a multi-national initiative between the governments of Namibia, Botswana, Angola, Zambia and Zimbabwe and a memorandum of understanding (MOU) was signed by the Ministers of Environment and Tourism of the five partner countries on 7th December 2006 agreeing to negotiate and work towards the establishment of the TFCA. This process is ongoing and the MoU will be repealed when the treaty to formally establish the KAZA TFCA is signed by these partner countries. These facts have also been omitted from the draft scoping report.

CONCLUSIONS

For the reasons stated above Frack Free Namibia & Botswana has no hesitation in demanding the rejection of a permit for seismic activities and an immediate withdrawal of the Environmental Certificate issued to ReconAfrica for all petroleum exploration activities in Kavango, Namibia.

We also call for a moratorium on all stages of the exploration phase until the conclusion of a transboundary Strategic Environmental Assessment that includes the potential cumulative impacts of oil and gas activities within the PEL 73 exploration area and beyond are conducted.

28 January 2021

I am writing to register my objection to exploratory drilling by Recon Africa in Namibia.

1. There has been insufficient information given to local communities that are going to be impacted by the drilling, and by the proposed extraction which will follow initial set up and exploration. The United Nations Declaration of the Rights of Indigenous Peoples, the right to free, prior and informed decision has in this case not been met.

I am a South African citizen, and I have lived for three years in a Canadian town where fracking for oil and gas extraction was the main source of employment. So I believe my experience of working with seniors in poverty in the community, who had lived in the town for 30 years or more, gives me an understanding of the after effects of resource extraction and its devastating consequences to the environment and to the community. This I could see with my own eyes in the large chemical run off in tailings ponds, the size of lakes, with toxic sludge, the poisoning of groundwater, and the indigenous communities battered by the influx of itinerant workers, and the boomtown, casinos, drug trafficking and exploitation of local women in prostitution. Not all indigenous communities will have the necessary training to be employed by the mining sector, and so instead of using this highly valued land resource and developing other skills to boost a tourism industry with sustainable industry and productivity, corporations will take over this area and only very few will benefit. Local communities will lose their ability to control their own environment.
The consequences of this endeavor, are lamentable. Other avenues should be taken to boost revenue in this region, and full consultation should be done with local communities at every level.

2. Sensitivity in the region to water scarcity.

Water in this region is already scarce. It cannot be denied that fracking on any scale will pose a great risk to groundwater sources. Fracking fluids containing water are mixed with chemical additives and pumped into wells to the level of the hydrocarbon bearing rock, this is then heated which causes the fracturing of the rock, and numerous small fissures. This process will pollute wetlands in the rainy season, and affect limited water resources in water scarce areas as well as create greenhouse gas emissions. It will be devastating to wildlife and to Indigenous communities who will carry the burden of this if it is imposed on them by government and big corporations.

Please acknowledge receipt of my submission.

Thank you

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Risk Based Solutions cc
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Namibia

28th January 2021

Attention Dr. Sindila Mwiya

COMMENTS AND OBJECTIONS TO RISK BASED SOLUTIONS DRAFT SCOPING REPORT FOR 2D SEISMIC SURVEY IN PEL 73 BY RECONAFRICA. KAVANGO, NAMIBIA

Dear Sir,

The following report is presented in response to the Draft Scoping Report (volume 1), for 2D Seismic Surveys within PEL 73, Kavango, Namibia, as proposed by Reconnaissance Energy Namibia (Pty) Ltd, and prepared by Risk Based Solutions

All the comments, suggestions and recommendations in this response will therefore refer to the following document:

> *Draft Environmental Scoping Report Scoping, for the application for Environmental Clearance Certificate (ECC) for the Proposed 2D Seismic Survey covering the Area of Interest (AOI) Petroleum Exploration Operations (Drilling of Stratigraphic Wells) in Petroleum Exploration License (PEL) 73 Kavango Basin, Kavango West and East Regions, Northern Namibia.*

This report is in response to an invitation to Interested and Affected Parties (IAP's) to submit comments and objections to the draft Scoping Report by no later than 29th January 2021.

In accordance with the Environmental Regulations clause 23 (1) (b), I wish to state that I have no direct business, financial, personal or other interest in the approval or refusal of the application.

Yours Faithfully

Jan Arkert Pr.Sci.Nat

cc. The Environmental Commissioner Mr. Timoteus Mufeti

COMMENTS AND OBJECTIONS TO RISK BASED SOLUTIONS DRAFT SCOPING REPORT FOR 2D SEISMIC SURVEY IN PEL 73 BY RECONAFRICA. KAVANGO, NAMIBIA

1. INTRODUCTION

The following report is presented in response to the Draft Scoping Report (volume 1), for 2D Seismic Surveys within PEL 73, Kavango, Namibia, as proposed by Reconnaissance Energy Namibia (Pty) Ltd. The reports were compiled by Risk Based Solutions, and the environmental assessment practitioner (EAP) is Dr. Sindila Mwiya.

All the comments, suggestions and recommendations in this response will therefore refer to the following document:

Draft Environmental Scoping Report Scoping, for the application for Environmental Clearance Certificate (ECC) for the Proposed 2D Seismic Survey covering the Area of Interest (AOI) Petroleum Exploration Operations (Drilling of Stratigraphic Wells) in Petroleum Exploration License (PEL) 73 Kavango Basin, Kavango West and East Regions, Northern Namibia.

This report is in response to an invitation to Interested and Affected Parties (IAP's) to submit comments and objections to the draft Scoping Report by no later than 29th January 2021.

The report has been compiled by Jan Arkert who holds a BSc (Honours) degree in geology and engineering geology and a MPhil degree in Wildlife Management. He is registered as a Professional Natural Scientist with the South African Council for Natural Scientific Professions (SACNASP).

Jan Arkert, is a registered Interested and Affected Party

2. PUBLIC PARTICIPATION PROCESS

2.1. A public notice has been placed in the New Era newspaper on 7th January 2021. The EIA Regulations section 21 (2) (c) states that *"advertising the application once a week for two consecutive weeks in at least two newspapers circulated widely in Namibia*". The EAP has not complied with this requirement as the advert has only been placed in one newspaper.

2.2. It is also apparent that the EAP has not complied with section 21 (2) (a) and (b) (i) of the regulations, which requires that the EAP must place notices at appropriate locations in the area that will be affected by the proposed activities.

Whilst the Regulations do make provision in section 21 (5) for deviation from sub-regulation (2), it is not stated in the report that the required manner and extent of the deviation has been agreed to by the Environmental Commissioner.

2.3. The noticed placed in the New Era indicates that both "formal meetings" and "afternoon sessions" are to be held. It is not clear what the difference in the meetings will be and why there appears to be a need to differentiate them. Furthermore, the notice also requires that participant register by email to reserve a place. This implies that the meetings will be closed meetings in which participants with dissenting opinions may be excluded. It also effectively excluded any IAP's and members of the community who do not have access to email or other electronic media.

2.7. With the devastating impacts of Covid-19 being felt across the entire planet, Namibia and Kavango East and West are not immune to the ravages of the disease. ReconAfrica and Risk Based Solutions however, are of the opinion that the EIA process and the stakeholder engagement must proceed. Many national regulations are currently enforced to minimise the spread of the virus, it therefore begs the questions:

i. What measure will be implemented and enforced during the EIA process to reduce the exposure of IAP's and stakeholders to Covid-19 during the public participation meetings?
ii. Will the public meetings be fully inclusive and participatory under current circumstances?
iii. Why is the EIA following a schedule with timelines set by the proponent during the current pandemic?
iv. Why are webinar and virtual conferences not being established for many IAP's who currently cannot travel internationally and are therefore excluded from the process?

3. SETTING THE RECORD STRAIGHT

3.1. Reference is made in section 1.2.1 on page 4 to *"…for a minimum two test wells"* to be drilled in the lease area. Similarly, reference is made in numerous of the proponent media announcements referring to the drilling of **three (3)** stratigraphic wells in Kavango. It must be pointed out that the EIA and EMP for the exploratory drilling program only addresses **two (2)** drill positions, namely BH 5-7 and BH 6-2. Drilling of any additional exploratory wells will constitute a breach of the Environmental Clearance Certificate.

Further reference to three stratigraphic wells is provided in section 4 on page 47.

3.2 An explanation is provided in section 5 on page 1 that no fracking will occur in PEL 73. Whilst this is reassuring, it is also well known from other shale oil/gas plays, particularly in the USA that fracking will be required in the event of shale based hydrocarbons being discovered. ReconAfrica have chosen to draw similarities to the "*Shell Whitehill play"* in South Africa in which fracking was

proposed. ReconAfrica refers explicitly in their July 2020 report to Shell's play in SA, highlighting that required water access for the fracking operations won't be a problem for Recon in the Kavango Basin:

"*Of tremendous concern in South Africa is water, a significant requirement for unconventional plays requiring fracture stimulation. Shell is looking at conservation, recycling, and brackish water as to not compete with locals for fresh water resources. ReconAfrica's situation is significantly better in that surface rights and access are held by the government, and abundant ground water supplies should be a source of building, not breaking, relationships with the local population. (page 17)*"

The company has also drawn analogies to the Eagle Ford play in the USA and has announced in the media that they have employed new senior staff to the company with considerable fracking experience to provide technological experience to open the conventional and unconventional resources in the Kavango Basin.

The WoodMacKenzie "Kavango Basin Review & Global Benchmarking" report compares the Kavango Basin with the Permian play in the US. The conclusion highlights "s*hould exploration undertaken by ReconAfrica in the Kavango Basin be successful, the details of how exploration and development has progressed in these three basins provides a useful benchmark as to what basin evolution may look like."* In the May 2020 presentation the founder of ReconAfrica, Craig Steinke, makes it more than clear that the company is after the shale play and that any possible so-called conventional resources would be merely a by-catch. It is therefore no secret that it is the intention of the proponent to ultimately apply hydraulic fracturing stimulation techniques in PEL 73. It is also obvious that following the current exploration process, fracking must be applied to determine the economic potential of extracting oil and gas from the Kavango Basin during the envisaged production period of at least 25 years. It is therefore disingenuous of the EAP to deny the potential introduction of fracking to Namibia.

Similarly, on page 6 in paragraph 1.3.4. the EAP has included a statement that the environmental assessment has nothing to do about conventional or unconventional oil and gas production, *"…because one cannot measure the unknown"* How then is it possible that the EAP is able to provide comments on the potential economic and social benefits that may accrue to the state of Namibia and the people of Kavango East and Kavango West if the unknown cannot be measured, as presented in para. 5.4.1 on page 100? Once again this is an illustration of the prejudiced attitude of the EAP.

Paragraph 7 on page 47 provides an indication of what processes will be followed in the event of oil or gas being discovered in the Kavango Basin. It is stated that *"…the derisking process covers the drilling of multiple appraisals testing wells in order to define the size of the oil and gas field" discovered"*. In the event of unconventional shale oil and gas resources being discovered, these *"testing wells"* must be stimulated by means of hydraulic fracturing or **fracking** to determine the

economic viability of progressing to a productive oil and gas play. Why is there no mention in the dSR that fracking will be a natural progression of activities in the event of ReconAfrica being successful in their endeavours?

4. CLIMATE CHANGE

4.1 Reluctant comments are made in paragraph 1.3.3. on page 6 acknowledging that climate change is an issue that will be resolved over the next 20 to 30 years. The statement is fallacious and does not regard current best practice as advised by the IPCC Special Report 18 (IPCC 2018). This internationally respected report clearly spells out the urgent requirements by the international community to prevent a global average temperature increase of 1.5^{0}C by 2030, i.e., 9 years from now. In essence the IPCC recommendations do not include the exploration and production of fossil fuel but do include dire warnings to reduce emissions.

4.2. Namibia is a signatory to the Paris Climate Agreement, which was ratified on 21st September 2016. No negative socioeconomic and environmental impacts that may accrue due to ReconAfrica's intention to bring oil and gas production to Namibia are addressed in the draft Scoping Report (dSR) Omitting to draw attention to the significance of the IPCC (2018) warnings and recommendations to maintain global warming below 1.5^{o}C, the EAP has neglected to address one of the primary environmental issues relating to the proposed petroleum exploration project.

4.3. In May 2018, the Permanent Peoples Tribunal (PPT) on Human Rights, Fracking and Climate Change heard testimony and received other evidence relating to fracking and its impact. Included were very substantial reports from four prior PPT Citizens' Tribunals that had gathered scientific, technical, social, cultural and experiential testimony from many community organizations, experts and individual citizens.

According to the preliminary statement of the PPT judges, "*the evidence clearly demonstrates that the processes of fracking contribute substantially to anthropogenic harm, including climate change and global warming, and involve massive violations of a range of substantive and procedural human rights and the rights of nature…. The evidence also shows that governments have, in general, failed in their responsibility to regulate the industry so as to protect people, communities and nature. In addition, they have failed to act promptly and effectively to the dangers of climate change that fracking represents."*[i] In the final Advisory Opinion, the PPT recommended that *"fracking be banned"* and that *"the Special Rapporteur on Human Rights and the Environment be asked to investigate the violations of the rights of humans and nature by the Unconventional Oil and Gas Extraction industry."*[ii]

This finding is echoed elsewhere: In October 2018, the UN's CESCR issued an official warning concerning fracking for shale gas in Argentina, saying that „*the Committee is concerned that this hydraulic fracturing project contradicts the State party's commitments to the Paris Agreement, with a negative impact on global warming and the enjoyment of the economic and social rights of the world population and future generations. (Article 1 (1) and 2 ((1))"*

In March 2019 the United Nations Committee on the Elimination of Discrimination Against Women (CEDAW) urged the British Government to "*consider introducing a comprehensive and complete ban on fracking*."

In June 2019, the Human Rights Council published a report on climate change and poverty, clearly highlighting the fact that "*fossil fuel companies are the main driver of climate change*" and that "*the track record of the fossil fuel industry makes clear that overreliance on profit-driven actors would almost guarantee massive human rights violations*".[iii]

4.4. Simple research on the internet revealed the existence of two documents prepared by the Climate Change Unit (CCU) of the Namibian Ministry for Environment and Tourism (MET) namely, "Intended Nationally Determined Contributions (INDC) of The Republic of Namibia to the United Nations Framework Convention on Climate Change" of September 2015 (CCU, 2015) and "Third Biennial Update Report (BUR3) to the United Nations Framework Convention on Climate Change"(CCU 2018).

A few relevant extractions from these revealing reports are included below to dispel some of the casual comments included in the dSR;

- The country is geared towards a progressive decoupling of carbon emissions from economic growth to match the low carbon pathway embedded in its policies and strategies. (page 2 CCU (2015).
- Namibia aims at a reduction of about 89% of its GHG emissions at the 2030 time horizon compared to the BAU scenario. The projected GHG emissions to be avoided in 2030 is of the order of 20000 Gg CO2-eq inclusive of sequestration in the AFOLU sector and compared to the BAU scenario page 2, CCU (2015).
- Increase share of renewable energy (hydro, solar, wind and biomass) in electricity production from 33% in 2010 to about 70% in 2030; (page 7, CCU (2015).
- Mitigation actions in the energy sector focus on the shift from fossil fuels to renewable energy sources, improved energy efficiency through various DSM measures and reduced fossil fuel consumption through a series of measures in the road transportation sector (page 14, CCU (2018).
- Namibia has significant renewable energy potential and has taken steps to direct investment and creating an enabling environment for private sector investment in renewables. (page 15, CCU (2018).
- The stated economic priorities of Namibia in the NDP5 are Logistics, Tourism, Manufacturing and Agriculture. (page 24, CCU (2018).
- According to Article 95 of the Namibian Constitution "the State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at the following: (l) maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future; in particular, the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory

These extracts are not exhaustive but serve to illustrate that the comments on Climate Change in the dSR bear no resemblance to the stated and published policies of the Namibian government.

5. PROJECT LOCATION AND EXTENT.

5.1. The entire extent of PEL 73 and the so-called Areas of Interest (AOI) fall within the boundaries of the Kavango Zambesi Trans Frontier Conservation Area (KAZA TCA). This is a multi-national initiative between the governments of Namibia, Botswana, Angola, Zambia and Zimbabwe and a memorandum of understanding (MOU) was signed by the Ministers of Environment and Tourism of the five partner countries on 7th December 2006 agreeing to negotiate and work towards the establishment of the TFCA. This process is well underway and the MoU will be repealed when the Treaty to formally establish the KAZA TFCA is signed by these partner countries.

The current petroleum exploration activities within the borders of KAZA therefore, haves international bearing on the MOU and potential implications must be included in the dSR, failing which the report is incomplete.

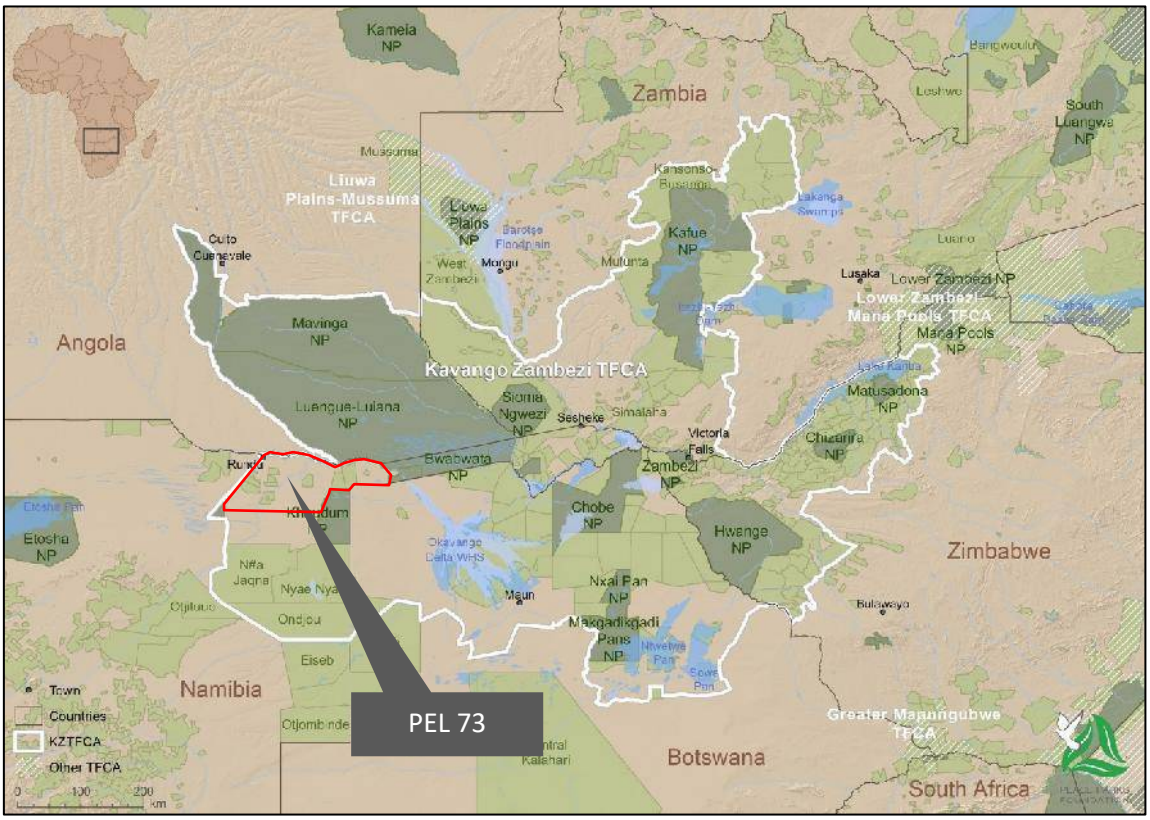

Figure 1. Boundaries and extent of KAZA, which fully encompasses PEL 73

5.2. On page 7 of the dSR the EAP, verbosely, explains that the AOI within PEL 73 are well away from the Okavango Delta, Tsodilo Hills, Okavango River and Khaudom and Mangetti National Parks.

Indicated in the report is that the Okavango River is located 80km to the north and Khaudom NP is more than 40km away, while Mangetti NP is some 70km from the project site. This is clearly not correct and casual perusal of figure 1.5 on page 11 and figure 1.6 on page 12, reveals the following;

- The northern limit of seismic line NS 3 is located some 3km south of the Okavango River.
- The southern limit of NS 3 is located at the boundary of Khaudom NP.
- Seismic line EW 5 is located 22km north of Mangetti NP.

5.3. Whilst the EAP is correct in pointing out the distances to the Okavango Delta and to Tsodilo Hills, which are both located in Botswana. It must be borne in mind that ReconAfrica created media material in which it is clearly shown that the company intends to extend their petroleum exploration activities into PEL 001 in Botswana. The success or failures of the current exploration activities in Namibia will have a direct influence on the future ventures in Botswana. It is therefore not prudent to exclude mention of potential impacts further afield in adjacent countries.

Furthermore, the current exploration falls within the catchment area of the Cavango/Okavango River Basin that is manage by OKACOM, in a tri-nation agreement between Namibia, Botswana and Angola. It is therefore apparent that the current activities have repercussions that extend well beyond the borders of Namibia.

The continual efforts by the EAP to enclose the spatial and temporal impacts of the petroleum exploration activities to PEL 73 cannot be justified, when it has been clearly stated by the proponent that their objective is to open *"One of the most significant undeveloped basins of such depth globally*" (Recon 2020).

5.4. A glaring omission in the dSR is the lack of reference to the existence of communal conservation area (CCA) that occur within PEL 73. Five such community conservancies fall within PEL 73 and are listed in table 1 below.

Conservation on state and communal land in Namibia is the legal responsibility of the Ministry of Environment and Tourism (MET), and is carried out by the Ministry, by self-governing Communal Conservancies. In 1996 an amendment was made to the Nature Conservation Ordinance of 1975, which devolved rights to communities over natural resources, which includes wildlife, and established rights for communities to set up tourism enterprises. These rights are exercised through communal conservancies.

Region	Conservancy	Gazetted	Approximate No. people (2019)
Kavango East Region	George Mukoya	September 2005	1,109
Kavango East Region	Joseph Mbambangandu	March 2004	1,796
Kavango East Region	Muduva Nyangana	September 2005	1,744
Kavango East Region	Shamungwa	September 2005	140
Kavango East Region	Kapinga Kamwalye	July 2018	3,761

Table 1. Gazetted Community Conservancies within PEL 73 (NACSO 2021)

The dSR make no mention of the fact that two of the CCA's listed above will be directly impacted by the proposed 2D seismic survey.

The northern portion of Seismic line NS 2 traverses through Kapinga Kamwalye Conservancy (No. 84) and also follows the eastern boundary of the southern portion of the same conservancy. Figure 2 is included to illustrate the boundaries of the affected CCA's and the proposed seismic survey lines.

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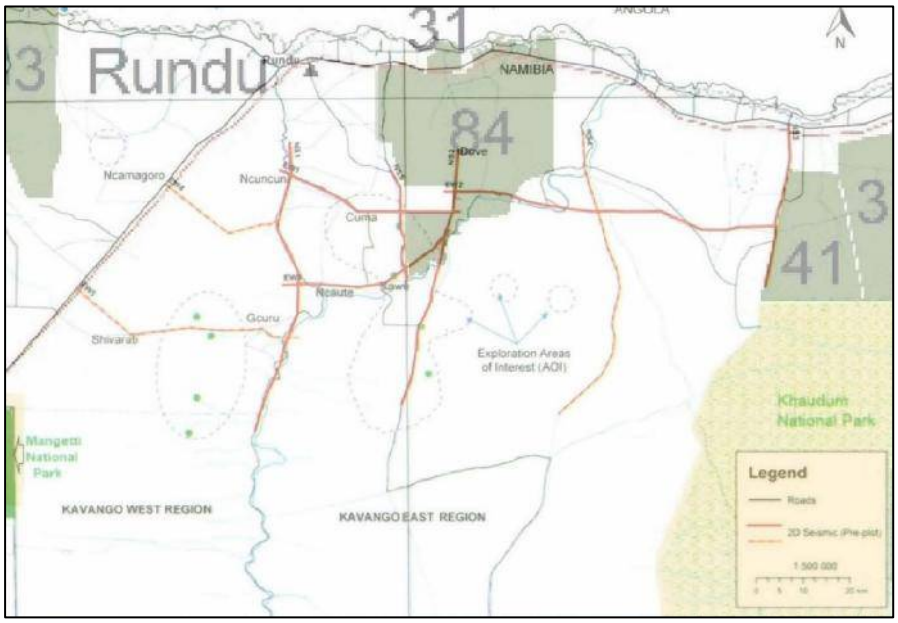

Figure 2. Location of community conservation area and proposed 2D seismic lines.

Similarly, seismic line NS 3 follows approximately 25km of the George Mukoya Conservancy (No. 41) western boundary.

5.5. It is stated repeatedly throughout the dSR that the seismic survey will follow existing roads and tracks, with some marginal widening required in a few places and no new cut lines will be created (page 8, 51, 57, 89).

Perusal of the proposed location of the cut lines on appropriate satellite imagery has revealed that approximately **29km** of the line's traverse areas in which **no** roads or tracks exist.

Despite the EAP's poor practice of not providing co-ordinates on any of the maps that show the location of the proposed seismic survey lines it was possible to overlay the maps provided in the dSR onto satellite images. Figure 2 below is a reproduction of the satellite image.

Studies of the image indicates that **23km** of the eastern portion of seismic line EW 2 east of Taratara traverses through virgin territory. It is also noted that the EAP selected not to include photographs of this section of the line in the dSR.

Similarly, a **6km** section of Line NS 1, immediately west of Ncaute will also need to be cleared of vegetation to enable the movement of vehicles.

It would therefore be appropriate for the EAP to provide evidence of the oft repeated statement that no new cutlines will be required, and to include geo-referenced photographic evidence of the sections mentioned above in the EIA.

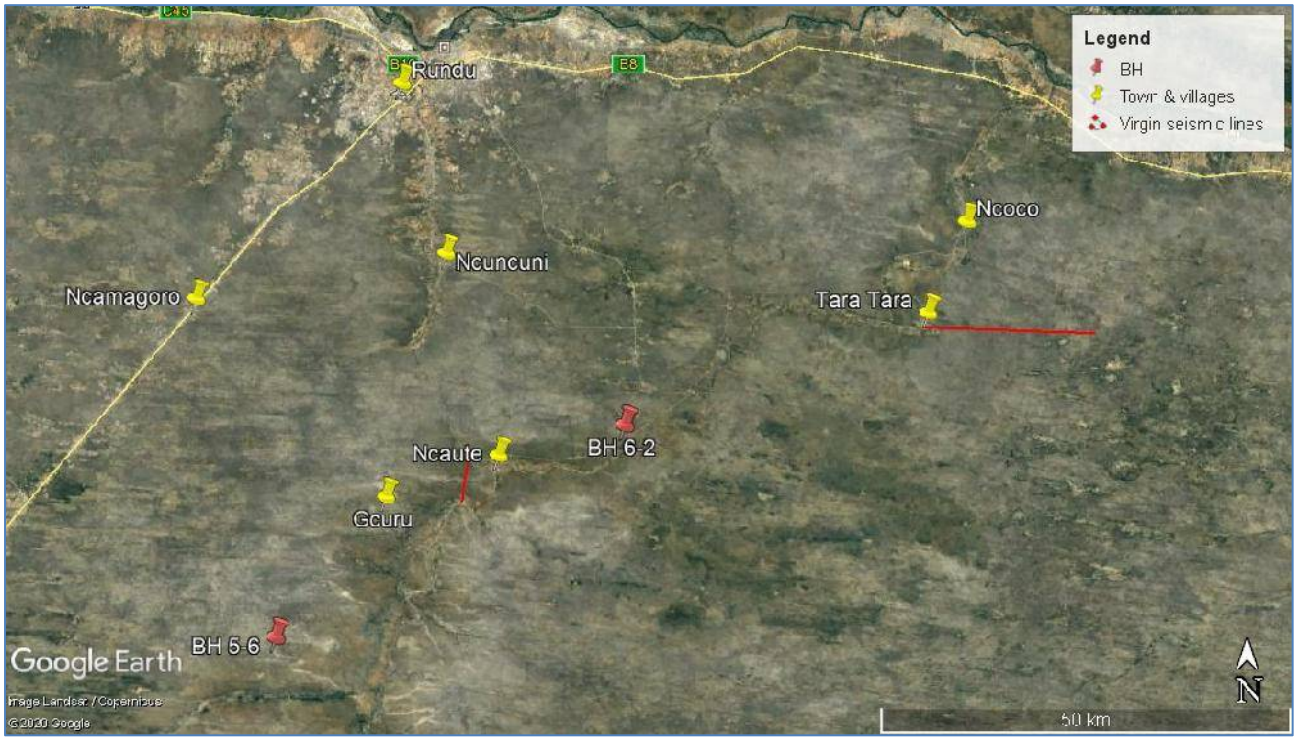

Figure 3. Sections of the proposed seismic lines that do not follow existing roads or tracks.

5.6. Reference was made to the possible presence of unexploded ordinances being present within the PEL 73 area in the EIA prepared for the drilling of 2 stratigraphic well. No mention of this risk is included in the dSR, which appears to be a glaring omission, when considering the activities that are proposed.

Not only is there a possibility of detonation of undetected ordinances in the temporary fly camps, but also along the virgin tracks that need to be cleared and along tracks that requiring widening. The risks are exacerbated by the heavy machinery as well as the heavy impact provided by the AWD.

6. THE RECEIVING ENVIRONMENT

6.1 *Groundwater*

6.1.1 Table 3.3 that appears on page 71 provides a comparison of international drinking water standards. It is not obvious why this table has been included in the dSR unless it is the intention of the proponent to drill additional water wells for the use of the 2D seismic survey. Are ReconAfrica or its nominated contractors planning to drill water wells at the location of the fly camps or elsewhere for use during the 2D seismic survey?

6.1.2 On page 72, table 3.4 has been included in the dSR that provides discharge limits for industrial effluent. Once again it must be questioned why this table has been included in the report? Although not stated in the report or discussed in detail it would appear from the information contained in the dSR that additional groundwater abstraction is planned, that will be used in an industrial application and subsequently discharged.

Will the quality of the effluent be tested prior to discharge, and if it does not meet the minimum requirements, how will the effluent be disposed of?

6.1.3 The description of the hydrogeological characteristics of Kavango East and West can, at best, be described as incoherent, and has clearly been compiled by means of “cut and paste” from disparate sources. Sentences are incomplete and paragraphs are inconsistent.

6.1.4 Furthermore, figures included such as figure 4.5 on page 87 are overly simplistic. This conceptualised plan of groundwater flow patterns is meaningless. It is so simplified that it includes no indication of vertical or horizontal scale or any geographical orientation. Neither is a reference provided which would enable the reader to contextualise the diagram. The diagram also appears to have been adapted for the purposes of this report with no credit provided, and in the opinion of this author, this constitutes meaningless, literary garbage, the inclusion who’s purpose is to appear scientific while offering no real information.

6.1.5. No hydrogeological information of special significance is provided in the dSR, and therefore SOUL approached Dr. S. Esterhuyse, (pers com) a hydrogeologist at Free State University to provide

additional groundwater information relevant to the PEL 73 area and her comments are included below:

> The Omatako river is ephemeral, rural people rely predominantly on groundwater in this area, especially close to the river (Jones, 2010). The Omatako river basin is underlain by two types of aquifers – the shallow Kalahari aquifers and the deeper fractured bedrock aquifers. The shallow aquifers are important in this region. They commonly yield more than 1m^3/h - and even up to 70m^3/h (Mapani 2012) - and have a drilling success rate of 100% (Christelis and Struckmeier 2011). These shallow aquifers receive recharge either directly during episodic rainfall events or indirectly from ephemeral runoff (Christelis and Struckmeier 2011). Rainfall in this area ranges from 400-600 mm/a (Jones, 1010). The deep fractured bedrock aquifers contain fossil water and only receive limited recharge (Christelis and Struckmeier 2011).
>
> The Okavango river basin is still relatively pristine (OKACOM, 2020a). However, oil and gas extraction could affect groundwater levels in the area and could contaminate the groundwater, which would impact the livelihoods of these people. Aquifers in arid areas cannot be cleaned once contaminated. Because recharge of the shallow groundwater mainly occurs via the river systems (Jones, 2010), the groundwater would most likely be contaminated if the river course is contaminated. Abstracting water from the local shallow aquifers for exploration and possible eventual oil and gas extraction can negatively affect the groundwater levels. And if groundwater is abstracted from the deeper fractured bedrock aquifers, these would not be recharged.
>
> Contamination in the Omatako river may affect water quality in the Okavango river system. Even though the Omatako river system is ephemeral, it does contribute water to the Okavango river during large episodic rainfall events. Contaminants might be mobilized and transported to the Okavango river during large rainfall events.
>
> The lack of specialized baseline water studies before allowing oil and gas exploration is a serious concern. The main predicted future water resource developments in this area will be along the river systems and the associated Kalahari aquifer systems in the Okavango basin (Jones, 2010). The 2010 OKACOM groundwater hydrology report however highlighted the serious lack of knowledge on groundwater resources in this area (Jones, 2010). Because groundwater and surface water resources interact, it is necessary to know how much water is available and is being used from both surface water and groundwater resources, and what the baseline water quality of each resource is. Over the long term, this baseline information would provide reference conditions to identify any oil and gas extraction impacts on water resources.
>
> Because of the limited knowledge, the EU currently funds an OKACOM project entitled *'Programme for Transboundary Water Management in the Cubango – Okavango River Basin'.* The project aims to address the lack of available transboundary funding for water resources management and land management, two of the main aspects that will be affected by oil and

gas exploration and development (EU 2017). The water resources aspect of the study would focus on developing a basin-wide hydrological and meteorological monitoring system to determine surface water resource yields and groundwater recharge and to strengthen drought and flood event predictions.

OKACOM facilitates the development of the Basin wide Environmental Monitoring Framework for the Cubango-Okavango River Basin (CORB) for this project, which will subsequently guide and inform monitoring projects and programmes within the basin. It held the Inception Workshop for the Groundwater Assessment of the CORB in March 2020 in Gaborone, Botswana. At this meeting, the OKACOM Executive Secretary again noted the lack of knowledge on the groundwater resources in the basin. The study will inform the development of a groundwater monitoring framework to determine the status of groundwater resources, by focusing on the current and future groundwater use in the CORB and will further inform the basin-wide conjunctive water utilization (OKACOM, 2020b). Ideally, these studies should be finalized and a water resources baseline monitoring system for the Kavango basin should be in place before allowing oil and gas exploration so that these studies could guide the licensing (and possible regulatory development) of oil and gas exploration and extraction.

Differences between riparian countries always complicate transboundary river cooperation. Different levels of water resources management capacity, infrastructure, and institutional and legal contexts all represent challenges to the joint management and protection of transboundary waters (EU 2017). Agreements also become outdated as new pressures have additional impacts on water resources in a basin, and the OKACOM agreement is therefore currently being reviewed (OKACOM 2020c). One of the shortcomings of the OKACOM agreement that has been specifically highlighted is the lack of cooperation in terms of groundwater resources (Mapani, 2012).

Oil and gas extraction, which could have yet unknown impacts on both the surface water and groundwater resources in the sensitive Okavango basin, is an aspect that must be addressed in the current review of the OKACOM agreement. Specifically, cooperation and information sharing on oil and gas license applications, and proposed water use and wastewater management practices during oil and gas extraction, must receive urgent attention. Joint standardised regulations to minimise the possible negative transboundary effects of oil and gas extraction on water resources must also be drafted as a matter of urgency. OKACOM could guide the process of developing such regulations.

The poor understanding of the potential effects of conventional and unconventional oil and gas extraction on the water resources and the poor understanding of the current state of the water resources in the Okavango basin are of biggest concerns. Allowing oil and gas extraction while these unknowns have not yet been addressed, poses a dire risk to the water resources, environment, and livelihoods of the people in the Okavango basin.

The fact that the Namibian government did not follow proper EIA procedures (Barbee and Neme, 2020) and allow oil and gas exploration (Terblanché, 2020) before having established a regional water resources baseline while at the same time not having suitable regulations in place to protect water resources during oil and gas extraction, all point to a serious lack of understanding of the possible negative environmental effects of oil and gas extraction in this sensitive region.

The many scientific unknowns increase the environmental risk of oil and gas extraction in this basin, be it conventional or unconventional. For instance, we do not properly understand the groundwater recharge mechanisms within the Omatako river basin and the wider Okavango basin. This is because many of the rainfall events are of relatively short duration and highly localized, which makes it difficult to sensibly quantify any hydrological response to determine aquifer recharge (Jones, 2010). Apart from rainfall intensity, a complex variety of factors, including soil conditions, the slope of the surface topography, vegetation cover, and the specific hydrogeological environment also play a role in the amount of recharge to an aquifer. Since large groundwater recharge events linked to high volume episodic rainfall in areas contaminated by oil and gas extraction, can irreparably damage the groundwater resources, it is important to develop a better understanding of aquifer recharge in this basin.

We also do not know the scale of surface-water groundwater interaction within the wider Okavango basin, which would influence contaminant movement from the surface water to the groundwater and the other way around. In addition, the Okavango delta is the terminal sink of the large Okavango river (Oromeng et al 2020) and captures contaminants over time. This is seen from the increase in salinity of the shallow alluvial aquifers along the fringes of the delta because of the weathering of rock formations that contribute salts to the river systems that feed the delta (Milzow et al 2009).

The knowledge about the groundwater balance (recharge versus abstraction) in this basin, is also poor because of a lack of monitoring data for these aquifers. This makes it difficult to predict the long-term sustainable yield of an aquifer. Abstracting groundwater from the shallow aquifers for possible fracking in the future could cause competition with local groundwater users. And if water for fracking is abstracted from deeper fossil aquifers that are not significantly recharged, it could draw these deep aquifers dry.

These are just some of the unknowns. There are many more. Because of all these unknowns, and because the Okavango basin is so sensitive and important to this region, a precautionary approach must be followed. Unfortunately, this does not seem to currently be the case.

6.1.6 Shale development is also linked to substantial volumes of freshwater consumption (in particular over the envisaged production period of at least 25 years). It has already outlined that Recon compares the Kavango basin with the Permian basin. According to the report *"The intensification of the water footprint of hydraulic fracturing"* (Kondash *et. al* 2018) the Permian basin used the most water during shale development operations (42,500 m³ per well in 2016).

"When water use per well is normalized to the length of lateral section of the horizontal well, in almost every case among oil producing regions, we observed an increase in water use per length of the horizontal well. This pattern is most evident in the Permian region, where water use increased from 4.4 m^3 per meter in 2011 to 29.3 m^3 per meter in 2016 for gas-producing wells, and from 3.9 m^3 per meter in 2011 to 21.1 m^3 per meter in oil-producing wells.."

6.1.7 The Ministry of Health and Social Services recently signed an agreement with Vienna-based International Atomic Energy Agency to assess how climate change is impacting Namibia's groundwater resources. We ask for a moratorium on the further steps of the exploration phase (including seismic surveys) until the results of the project called "Assessing the impact of climate change and variability on groundwater resources in major aquifers in Namibia" have been provided.

6.2 *Fauna*.

6.2.1 Section 4.3.1 on page 76 of the dSR provides an indication that a comprehensive desktop study of fauna and flora was conducted during December 2018. The EAP has failed to make the specialist report available for public scrutiny and has also failed to provide the name, qualifications and relevant experience of the specialist.

6.2.2 On page 76, section 4.3.1 the EAP has indicated that follow up fieldwork that is studying the fauna and flora in PEL 73 has been conducted during November and December 2020. Once again, the details of the specialists who conducted the survey have been excluded from the dSR. This survey cannot be comprehensive or relevant as it has clearly not considered seasonal variations which affect migrant avifauna and other animals, breading seasons and cycles, or blooming, fruiting and dormancy in plants. Similarly, the appearance or absence of invertebrates are also seasonal.

6.2.3 The EAP has included a dismissive comment on page 101 in section 5.4.2.2 in which the presence of migratory elephants that occur in the area is dispelled and suggests that this fallacious concept has been created by people unfamiliar with the area. The EAP, however, has ambiguously included a statement in the third paragraph on page 101 of the dSR referring to the movement of elephants in the area by acknowledging that the animals are not sedentary.

It is therefore appropriate to reproduce figure 4.1 and the caption that appears on page 42 of Risk Based Solutions Environmental Impact Report Volume 2 of 3 for exploratory drilling in PEL 3 dated June 2019, to remind the EAP of the content of that report.

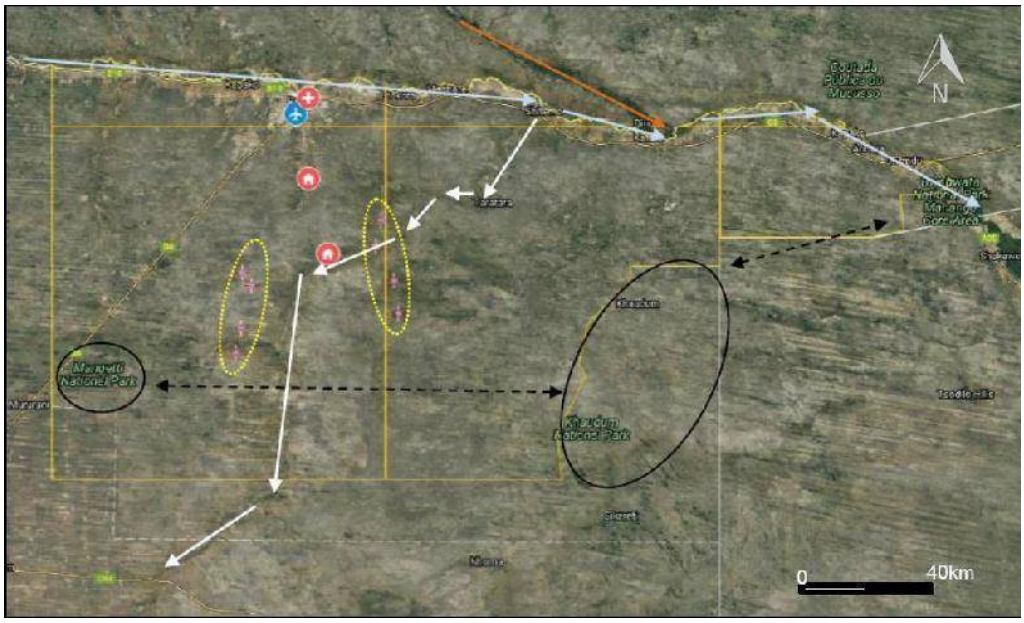

Figure 4.1: Important habitats in the general area are: Okavango River (blue arrows); Quito River (orange arrow); Omuramba Omatako (white arrows) and the Kaudum and Mangetti National Parks (black oblongs). **Elephant movement between Kaudum and Mangetti NP's and Kaudum NP and Bwabwata NP (Mahangu Core Area) are indicated (dotted black lines).** Important prospecting sites indicated (dotted yellow lines).

Portions of the cation have been highlighted to emphasise the EAP's clear and unambiguous comments contained in the previous EIA report. It is therefore apparent that the EAP is confused as to whether elephants are sedentary or mobile. Paragraph 6.2.4 below has been included to provide some scientific background to the state of affairs.

6.2.4 The presence of occasional and rare migrant bull elephants (and other ungulates) (Martin 2003) that migrate between Mangetti NP and Khaudom NP are documented in scientific literature (Stoldt *et. al* 2020, De Beer & van Aarde 2008, Roever et.al 2013, van Aarde *et. al* 2006, van Aarde & Jackson 2007, Olivier 2009, Purdon *et al* 2018)

Conservation, and in particular management of elephant populations have progressed from the colonial style "fence and fine" or fortress concept. Modern concepts are inclusive of the needs of local communities as well as maintenance and functioning of ecosystems. The concept of transnational conservation areas such as KAZA and national parks (Khaudom and Mangetti NP) and community conservation areas (Kapinga Kamwalye Conservancy No. 84 and George Mukoya Conservancy No. 41), such as those that exist within the boundaries of PEL 73 are representative of the concept of metapopulation conservation management.

Metapopulation theory applies to situations where the habitat of individuals, and in this case, elephants, is not homogenous, but consists of discrete islands or patches such as Khaudom and Mangetti NP and adjacent CCA's. Due to isolation from other patches, the populations in individual

patches have their own dynamics. However, these patches are not completely isolated because dispersers (usually migrant bull elephants) may occasionally cross the distances and barriers between patches. A patch that becomes empty due to local extinction may consequently be re-colonized by dispersers from occupied patches (Olivier 2009)

Olivier (2009) indicated that metapopulation dynamics depend on immigration and emigration and sub-population dynamics depend on habitat patch size and quality. Regional dynamics depend on habitat patch position, connectivity, and environmental processes. The balance between these two levels of dynamics, local and regional is determined by various features of the patch network, and of the species. It is into this inter-patch network that ReconAfrica propose introducing petroleum exploration and ultimately production, with no apparent concerns expressed by the EAP in the dSR.

6.2.5. Included on page 101, section 5.4.2.2 paragraph 2 is a statement describing the fact the elephants communicate through low frequency vocalisations, typically in the range of 14 to 35Hz. Vocalisations such as rumbles produce seismic energy and Rayleigh waves that enable elephants to communicate over long distances (Gunther et al 2004, O'Connell-Rodwell 2007). Poole *et al* (1987) describe typical infrasonic signals and seismic waves that include contact calls and answers and warning calls. Musth calls by sexually aggressive male with elevated testosterone levels are usually received and responded to by a female chorus within a family herd, thus enabling the bulls to locate and breed with receptive females.

An accelerated drop weight is intended to be used which will produce seismic waves, including Rayleigh waves that elephants are capable of sensing. No indication of the frequency range and amplitude of the seismic signal that is produced by this method is provided in the dSR. This information is critical to be able to determine the potential impacts on elephants in the region. As indicated in section 6.2 of this report the proposed seismic lines will extend to the Khaudom NP northern boundary and along the eastern boundary of the George Mukoya Community Conservation Area and breeding herds of elephants occur in both these areas.

It will therefore be prudent that the potential impact on the resident elephant population within and adjacent to PEL 73 due to the proposed 2D seismic surveys is fully studied and evaluated by qualified, independent researchers.

6.3 *Flora*

6.3.1. In section 4.3.1, the last paragraph that appears on page 77 refers to the presence of large trees and grasses that occur in the general vicinity of PEL 73. No effort has been made to identify the presence of geophytes, and small perennial and non-perennial plants. These include traditional medicinal plants that are commonly used by local communities.

This is an omission that must be rectified during the EIA process.

6.3.2. As indicated in section 67.2.2 of this report a fauna and flora survey cannot be conclusive or relevant if it does not consider seasonal variations and cycles.

7. ENVIRONMENTAL RISK ASSESSMENT

7.1. Section 5.3.2 point (v) on page 99 argues that the current and future negative impact on the receiving environment may still occur if petroleum exploration does not take place. Land degradation, deforestation, new homesteads, land clearing for agriculture are some of the negative factors that are cited. It must be emphasised that these factors are continual impacts due to increasing population densities in Kavango East and West, and it is clear the EAP considers these customary communal activities as negative.

Clearly the EAP finds it appropriate to speculate on the potential negative environmental outcomes of normal communal life within PEL 73, without applying similar speculation and consideration to the negative environmental impacts of an oil and gas industry, in particular based on perspective shale development and fracking operations over the envisaged production period of at least 25 years. Documented and researched socioeconomic and environmental impacts on the receiving environment due to exploration and production of a shale oil /gas play have been included below to illustrate the negative impact of shale oil and gas exploration and production (CHPNY & PSR, 2020). These environmental and social impacts can be attributed directly to conventional and unconventional oil and gas extraction activities and do not include predicted impacts due to Climate Change which will be aggravated by the proposed mining of fossil fuel in PEL 73.

- Industrialization of a former rural area
- Greenhouse gas emissions
- Habitat fragmentation and degradation
- Surface and groundwater pollution and contamination
- Water stress and deficit
- Air pollution
- Inherent engineering problems that worsen with time
- Radioactive releases
- Occupational health and safety hazards
- Public health effects
- Noise pollution, light pollution,
- Earthquakes and seismic activity
- Abandoned and active wells as pathways for gas and fluid migration
- Threats to agriculture, soil quality, and forests
- Threats from fracking infrastructure
- Inaccurate jobs claims, increased crime rates, threats to property values
- Local government burden
- Threats to the climate system

It must also be borne in mind that the many social and environmental impacts shown above will occur in addition to the influences from customary communal activities that the EAP identified on page 99.

7.2. Without providing any further details of ecosystem and ecosystem services in paragraphs (vii) and (viii) on page 99, it may be appropriate to provide some additional insight into the potential impact on the functioning and services provided by ecosystems within and shale oil and gas environment.

Whilst under conventional EIA process, comments and objections are typically confine to the environmental impacts associated with the development or activity under consideration, the EAP has chosen to exceed the usual mandate in the dRS. This has also been aggravated by ReconAfrica's chosen strategy of separating the EIA process into smaller units to undermine public scrutiny of the cumulative effects.

With the distorted attitudes displayed by ReconAfrica and the EAP, it is appropriate that this report illuminates potential impacts to ecosystem functions and ecosystem services that may be affected by potential future oil and gas activities in PEL 73 (Arkert 2015).

7.2.1 *Provisioning Services*

The four categories of ecosystem services that were identified in the Millennium Ecosystem Assessment (MA 2005) are all applicable to the Kavango East and West. The ability of ecosystems to provide arable land, clean water, energy and genetic resources for the benefit of human well-being are termed provisioning services. The value of end products provided by provisioning services are generally determined by the surface area of productive agricultural land or volumes of clean water that are typically easy to quantify and can be expressed in monetary terms. In PEL 73, the direct loss of land currently used for agricultural purposes, the potential loss of water through direct competition with shale mining and the loss of genetic diversity due to habitat transformation and introduction of non-native species all have direct implications for the continued quality of provisioning ecosystem services. Removal of vegetation and the associated reduction of leaf litter and organic material, including animal waste from the uppers soil horizons will limit the introduction of nitrogen, organic carbon and phosphorus and hence the fertility of the soils that are already considered to be nutrient deficient.

7.2.2. *Regulating services.*

Regulating services prevalent in Kavango East and West include, but are not confined to, the stabilisation and regulation of the hydrological cycle, erosion control and air quality. The spatial extent, as well as the temporal scales over which regulating services operate, are such that the ecosystem services described as regulation services are subject to considerable anthropocentric abuse. In a modern display of the tragedy of the commons, (Hardin 1968), upstream exploitation of regulating services such as the discharge of pollutants into a natural water system that may provide financial benefit to a few, could result in deprivation or direct financial implications to many downstream users.

Shale gas mining in PEL 73 will introduce a widely distributed industrial process to the region in which extensive linear infra-structure will be required and large volumes of water will be eventually be made unavailable to alternative use. The extent of roads, pipelines and drilling pads that will be

developed will require thousands of hectares of land to be cleared of vegetation, which will exacerbate the rate of removal of topsoil from the area due to increased stormwater run-off. Concentrated run-off of water from un-vegetated and unprotected surfaces will reduce water infiltration into the soil horizon and will reduce groundwater recharge, thereby increasing the severity of periodic flood event, which on the other hand will increase the risk of water contamination through highly toxic substances (chemicals used in the drilling process and waste water often stored on-site in pits).

Rehabilitation and revegetation of land in arid and semi-arid areas is a gradual process requiring time; decades and even centuries (Van Den Berg and Kellner 2005). Initial exploration, production and subsequent closure of gas mining activities are anticipated to span a period of at least 25 years (Recon 2020) during which time it is assumed that maintenance will be provided to limit and control soil erosion, however, it is more probable that low level of supervision and maintenance will be applied following closure.

The deleterious impacts on a regulating ecosystem service due to the homogenisation of plant species and the impacts of abiotic components of an ecosystem are illustrated by the effects of introduced non-native flora. Seeds of non-native vegetation that propagate along roads and pipelines are transported by traffic and storm water drainage facilities that discharge into natural drainage system.

The temperature gradient will increase from east to west across southern Africa together with progressive xeric conditions extending across the sub-continent and the geographical locations of suitable habitat for species will shift towards the east. Sedentary and specialist species, unable to spread propagules beyond geological and topographic boundaries are less likely to adapt to rapidly changing biotic and abiotic conditions and suitable habitat will diminish in extent or disappear altogether. Co-evolutionary symbiotic relationships between species will be affected by the climatic changes, resulting in the demise of biodiversity due to the loss of one or more of the species dependent on such relationships.

The anticipated effects of climate change on biodiversity and the demise of ecosystems will directly affect the ecosystem services that provide well-being to populations inhabiting the northern Namibia.

7.2.3 *Cultural services*.

Cultural services are intangible human benefits derived from ecosystems that include spiritual and creative inspiration, a sense of aesthetic fulfilment as well as present and future scientific discovery. Further cultural ecosystem services are the preservation of ecosystems for future generations to apply options that may not be considered by current generations (Daily 1997).

Shale oil/gas mining in the PEL 73 will convert the current rural ambiance of the region to a more intensively used and industrialised area. The visual intrusion of oil/gas mining infrastructure, such as roads, drill rigs, gas flares, pipelines and compressor stations will reduce the aesthetic allure and

serenity of the areas affected. Furthermore, the potential reduction of biodiversity and degradation of traditional, cultural and historical sites may impact on the existing socio-economic well-being of indigenous populations.

7.2.4 *Supporting services*.

Habitat degradation and fragmentation, barriers and edge effects, introduction of invasive species and potential increase of mortality by road accidents and poaching are activities that may be introduced to the PEL 73 area by shale gas mining. Viability of existing populations of endangered and rare species may be affected by all the species limiting factors listed. The associated reduction of nutrient distribution resulting from the demise of wildlife populations and the potential increase in populations of alien species may result in the further homogenisation of vegetation in the area. Figure 5 has been included to illustrate the interaction between shale oil and gas extraction and the effects on ecosystem services.

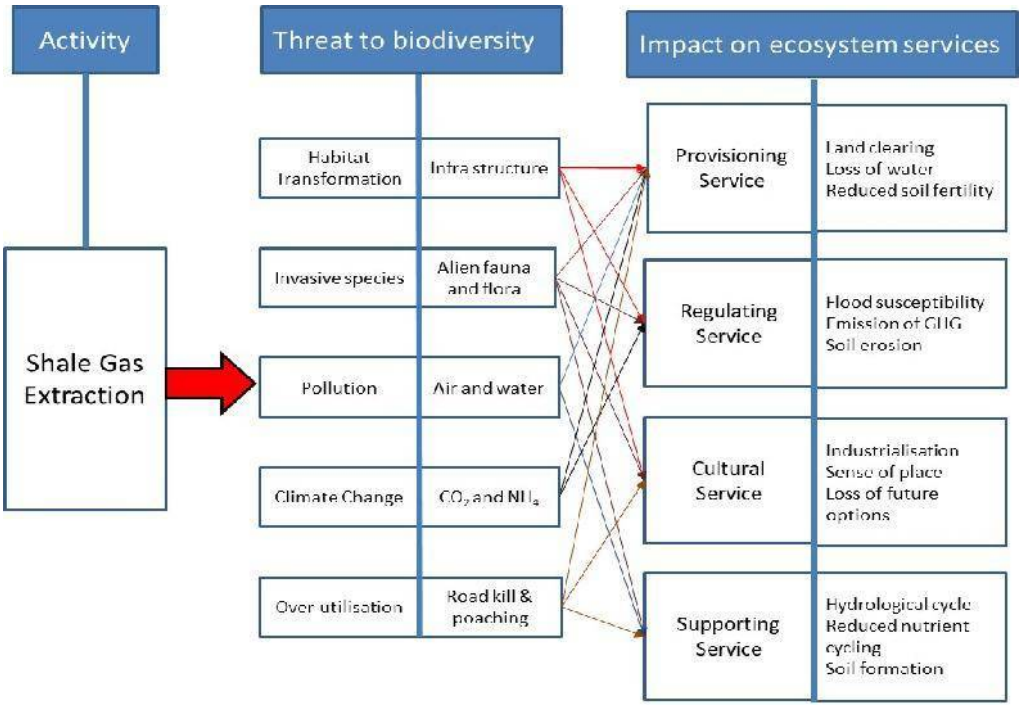

Figure 4. Relationships displayed of the impact of shale gas mining, potential threats to biodiversity and impacts to existing ecosystem services in PEL 73, Namibia (Arkert 2015).

7.3. *Environmental Risk Matrix*

7.3.1 Section 5 of the dSR on page 106 presents the proposed environmental risk assessment of likely impacts. The section goes onto providing tables 5.4, 5.5 and 5.6 which list the evaluation criteria for the magnitude, duration and extent of impacts, respectively. A numerical 6-point grading scale

has been included for magnitude, but the duration consists of a 2-point scale, reflecting that the impact is either permanent or temporary. The spatial extent of the impact is measure on a 5 point alphabetic grading scale. Likewise, on page 107, table 5.7 presents a 5-grade alphabetic evaluation scale for the probability of an event occurring.

In table 5.8 on page 109 a receiving environment sensitivity rating scale, which is graded in 5 steps from negligible to very high. It is not explained how this final sensitivity scale is achieved, particularly when it is considered that different alpha-numeric values are used the determine the various input factors.

There are no means by which the incongruent grading scales can be summarised into a coherent risk assessment that can be understood. The proposed grading of the social and environmental impact that the EAP intends to apply in the EIA constitutes a complete oversimplification of the means to evaluate the severity of environmental risk.

For example, assuming an activity has been assessed to have a ***magnitude*** rating of tolerable effect and scores a value of 2. The same activity is however deemed to be ***permanent*** in duration and scored a P. Similarly, the geographical ***extent*** is of a regional extent, R. The ***probability*** of the impact occurring is medium and is assigned a D. How are these disparate alpha-numeric grades combined to assign an appropriate ***sensitivity*** rating?

7.3.2 Furthermore, on page 109 an environmental impact matrix that vaguely resembles a Leopold Matrix is shown, which has been modified by the EAP. No indication is provided how the matrix will be compiled using the assessment criteria as discussed in 8.3 above.

The indications are that commonly recognised environmental evaluation method will not be applied to this EIA process and it is evident that an overly simplified, customised evaluation method will be applied. This cannot be considered acceptable or adequate for a large and complex project of this nature that has potential international ramifications.

7.3.3. Table 5.8 on page 109 includes 5 line items that are potential sources of impacts to be considered during the environmental risk assessment. These are limited to:

1. Planning and mobilisation
2. Campsite set ups and widening of tracks and creation of limited new access as may be applicable.
3. Actual data acquisition along individual profiles/survey lines.
4. Demobilisation and closure.
5. Any accidental event that may be associated with the routine and physical presence operational activities.

This list of potential impact sources represents a dramatic oversimplification of the site activities during the proposed 2D survey that may be sources of social and environmental impacts. A suggestion of the activities that are likely to take place during the seismic survey that will enable a more comprehensive and inclusive assessment to be made must include the following:

J. Arkert

1. Planning and mobilisation
   - 1.1 Road widening during mobilisation, i.e. destruction of habitat.
   - 1.2 Vehicle emissions.
   - 1.3 Covid-19 expose to staff and community.

2. Campsite set ups and widening of tracks and creation of limited new access.
   - 2.1. Number of fly camps required, and total area cleared.
   - 2.2. Number of people to be accommodated and volume of waste generation.
   - 2.3. Waste type and disposal.
   - 2.4. Covid-19 exposure of crew
   - 2.5. Covid-19 exposure of communities.
   - 2.6. Length and width of roads requiring widening.
   - 2.7. Length and width of new roads needed to be cleared.
   - 2.8. Total vehicle fuel emissions
   - 2.9. Dust emission by total vehicle usage.
   - 2.10 Noise pollution.
   - 2.11 Impact of activities on fauna and flora

3. Actual data acquisition along individual profiles/survey lines.
   - 3.1. Duration of seismic survey.
   - 3.2 Impact on existing groundwater infrastructure
   - 3.3 Frequency of seismic energy and proximity to receptive animal.
   - 3.4 Total vehicle fuel emissions
   - 3.5. Dust emission by total vehicle usage.
   - 3.6 Noise pollution.
   - 3.7 Community crop damage.
   - 3.8. Damage to community housing and facilities
   - 3.7 Covid-19 exposure of communities and crew

4. Demobilisation and closure.
   - 4.1. Vehicle emissions.
   - 4.2 Covid-19 exposure of crew and community.
   - 4.3 Rehabilitation of campsites
   - 4.4 Rehabilitation of roads and tracks

5. Any accidental event that may be associated with the routine and physical presence operational activities.
   - 5.1. Fuel spillage
   - 5.2. Vehicle accident.
   - 5.3. Fire, camp and veld.
   - 5.4. Outbreak of Covid19 in crew and adjacent communities.

Each of these potential impact activities must be evaluated against the proposed physical environment, biological environment and the socio-cultural environment. A rational sensitivity rating must be assigned to each so that a comprehensive environmental risk assessment of the proposed 2D seismic survey can be determined.

8. GENRAL COMMENTS ON REPORT QUALITY

8.1 It is very apparent from the poor quality of the report that it was compiled under conditions of duress. The dSR is littered with spelling, typing and editorial errors and a few examples are included below:

- Page 38 aeromagtics (repeated several times) should read aeromagnetics
- Page 39 3200m depth of the exploratory drill holes must read 2500m
- Page 46 conventional and conventional must read conventional and unconventional.
- Page 48 Explorer 680 must read Explorer 860
- Page 56 si6tes must read sites.
- Page 60 section 3.2.3 is missing from the report.
- Page 92 Figure 4.7, New Ear must read New Era.
- Page 120 Maggs (1998) citation is missing from the reference list

This list is by no means complete but is included to illustrate the poor application of simple editing and spell-checking tools that are available. To the reader there appears to be a general lack of diligence applied to the compilation of the dSR.

8.2. A comment that is included on page 57 section 2.4.3 refers to *"…**we** lessen the impact and damage costs…"* The word **"we"** is repeated further down in the same section. In the context in which the word has been used insinuates that the EAP, together with ReconAfrica will lessen the costs. Does this perhaps imply that either ReconAfrica were the authors of this section or alternatively that Risk Based Solutions will be directly involved in the activities.

8.3. Significant aspects of the report are irrelevant, and it appears that sections were included to embellish the dSR. Once again examples are cited below:

- Page 40, figure 1.8. depicts exploration activities that occurred in the Ovambo Basin, located some 300km west of PEL 73. What possible bearing or significance is this figure to the current project?
- Page 42, figure 1.10, shows a historical seismic survey that was conducted approximately 180km west of PEL 73. The caption includes a reference to Acrep, the company that Risk Based Solutions have acknowledged to have provided technical assistance to. A further comment indicates that the project was completed to the satisfaction of the Governor of Kavango West and Councillors. The figure once again bears no relevance to the current project other than to accentuate the image of the EAP.

- Page 46, section 2.2 presents an explanation to the reader of the risks and procedures associated with petroleum exploration. The analogies provided are exceptionally simplistic and belittling. It is also not clear why the EAP needs to go to such lengths to explain the risks that ReconAfrica and their investors have chosen to take. Further on in the dSR, on page 48 in section 2.3, a detailed and technical explanation of the use of seismic surveys as an exploration tool is included. This is very technical to the lay reader, however, the EAP did not see the need to simplify this section by including patronising analogies.
- Page 60, section 3.2.2. provides an explanation of the process required to obtain a petroleum exploration licence. This is neither relevant to an EIA and has no bearing on the environmental process at hand.
- Page 92 and 97, depict the notice that was placed in the New Era newspaper. It is not apparent why two figures are required depicting the same notice.
- Page 105 once again repeats information about the stakeholder meetings which is included on pages 91, 92, and 97.

8.4. The use of emotive or persuasive language is not appropriate in a dSR, where it is required that the EAP must be impartial. On page 50 the Explorer 860 is described as *"…environmentally friendly".* This comment is neither accurate nor appropriate and appears to be included to persuade the reader of the suitability of using this equipment for the propose seismic survey.

9. GENERAL COMMENT ON INTERNATIONAL ENVIRONMENTAL IMPACT TRENDS

Fidler and Noble (2012) provided an overview of international trends in environmental management from managing individual projects to more regional approaches. This includes EIA studies which have been subject to much criticism for being focussed on individual project activities such as the current draft Scoping Report under review. Constraints of project-based EIA's include inadequate consideration of cumulative effects and development thresholds (Duinker and Greig, 2006); insufficient regional baseline data to detect environmental change (Dubé, 2003); loss of alternative options because assessment occurred too late in the development sequence (Vicente and Partidário, 2006) and limited public influence over the direction of development activity (O'Faircheallaigh, 2010).

Recognising the limits of project-based EIA's in proactively planning and managing oil and gas activities like this one, it is advocated that a moratorium is declared by the appropriate Namibian Authority with immediate effect and that a Strategic Environmental Assessment (SEA) of the regional and international impacts is initiated. To effectively deliver on the benefits of SEA, and to ensure appropriate planning for environmental and social impacts, a multi-sectoral approach is required, with terms and conditions for project-specific developments and regional monitoring programs

10. ENVIRONMENTAL ASSESSMENT PRACTITIONER

10.1 The EAP, has presented a comprehensive personal CV, which lists numerous positions and projects completed while in the employ of many multinational oil and gas companies. It is also stated that his academic qualifications and background in the field of the earth sciences and specialising in geology and geotechnical engineering. The EAP has made several pronunciations and statements in the reports that are beyond his skills and qualifications.

With a career deeply embedded within the oil and gas industry the impartiality of the EAP must be raised. The following extract was obtained from the home page of Risk Based Solutions (RBS) website www.rbs.com.na accessed on 19th January 2021. The objectives and aspirations of RBS appear to contradict the requirements of an EAP whose obligations are to be objective and impartial to the outcome of the environmental assessment.

About Us

Founded in 2004, Risk Based Solutions (RBS) CC, Reg No CC/2004/1305, is the consulting arm of Foresight Group Namibia (FGN) (PTY) LTD. Both RBS and FGN are Namibian local owned companies established with the objective to meet the demand and for the promotion of Local Knowledge Based Solutions (LKBS) in the following investments and consultancy portfolios of our specialisation:

- Mineral exploration and mining.
- Petroleum (Oil and Gas)
- Energy (Solar, Wind and Thermal)
- Tourism Investments and experiences.
- Property development and management.
- Waste Management.
- Environmental Assessments (EIA, EMP, SEA, SEMP).
- Geological (Geo-environmental and Geotechnical)
- Engineering Programme and Project Management and Logistics.
- Specialised Training and Industry Research.

Risk Based Solutions (2021)

10.2 No signed declaration of independence or potential conflicts of interest is included in the document. In terms of Environmental Impact Assessment Regulations: Environmental Management Act, 2007, an environmental assessment practitioner (EAP) must "*perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant*" EIA Regulations, sec. 4(b).

Considering the information provided above, it is apparent that the EAP does not comply with these legislated requirements. Additional evidence of the prejudicial attitude and lack of objectivity of the EAP has been provided in this report.

10.3 Paragraph 1.3.3 on page 5 includes a broad statement about possible future positive economic benefits from an oil and gas industry located in Namibia. The current draft Scoping Report (dSR) however, only address the impacts of the current proposed 2D seismic survey under consideration. The EAP has therefore exceeded his mandate and qualifications and provides a sweeping statement which cannot be justified. The comments are unreferenced which imply that they are a personal observation and are unsubstantiated and clearly demonstrate a lack of objectivity.

The splintered manner in which the environmental impact assessments process for petroleum exploration is currently being conducted by ReconAfrica is a strategic tactic to avoid exposure of cumulative negative potential social and environmental impacts. The provocation and hard sell of the possible future benefits as presented by the EAP are not appropriate and if a reasonable balanced and considered opinion is to be achieved, the negative environmental and socioeconomic impacts must also be mentioned.

10.4. Further indication of the EAP's vested interest in a positive Record of Decision in the current EIA process is provided on in paragraph 1.5.2 section (ii) on page 39, where indications of technical assistance that was provided to petroleum exploration efforts are included.

- Permitting and technical assistance was provided to Preview Energy Pty Ltd by Risk Based Solutions in 2010.
- Permitting and technical assistance was provided to Preview Energy Pty Ltd by Risk Based Solutions in 2012.
- Permitting and additional support was provided to Acrep Exploracao Petrolifera SA by Risk Based Solutions in 2018.

The list suggests that Risk Based Solutions may have vested interests in providing support work and other technical input into the exploration activities being carried out by ReconAfrica in PEL 73. This constitutes a serious conflict of interest and provides additional evidence that the EAP must recuse himself from this EIA process.

10.5 Clause 21 (6) of The Environmental Impact Assessment Regulations: Environmental Management Act, 2007 states the following:

Public consultation process

21. (1) This regulation only applies where specifically required by a provision of these regulations.

(6) When complying with this regulation, the person conducting the public consultation process must ensure that –
(a) information containing all relevant facts in respect of the application is made available to potential interested and affected parties; and
(b) consultation by potential interested and affected parties is facilitated in such a manner that all potential interested and affected parties are provided with a reasonable opportunity to comment on the application.

A request was made by me for copies of the fauna and flora, as well as the socioeconomic and archaeological specialist reports which are mentioned and referenced in the dSR.

In response to an email sent on 26th January 2021, the EAP chose to refuse to make copies of the requested specialist reports, in part, with the following reply

"…It not for you come back to me and demand previous specialist studies done by our specialist and recommended to be reviewed not referenced, okay. Many other documents have been reviewed as part of EIA process for the proposed 2D seismic survey and I am under no obligations whatsoever to now send you documents that have been reviewed and yet you claim to be an expert / specialist in oil and gas exploration and on the receiving environment of Kavango West and East Regions."

The EAP has shown absolute distain and contravened the environmental regulations and is therefore, in my opinion, unfit to continue to conduct and manage the EIA process on behalf of ReconAfrica.

11. CONCLUSIONS

Considering that Article 95 of Namibia's Constitution mandates the *"maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of the Namibians, both present and future."* In addition, for reasons that have been spelt out in this report, the morally and ethically correct and scientifically appropriate decision must be to terminate the current Environmental Impact Assessment process.

Recognising the limits of project-based EIA's in proactively planning and managing oil and gas activities, it is advocated that a moratorium is declared by the appropriate Namibian Authority with immediate effect and that a transboundary Strategic Environmental Assessment (SEA) of the regional and international impacts is initiated. To effectively deliver on the benefits of SEA, and to ensure appropriate planning for environmental and social impacts, a multi-sectoral approach is required, with terms and conditions for project-specific developments and regional monitoring programs.

I, therefore, have no hesitation in demanding the rejection of a permit for seismic activities, and an immediate withdrawal of the Environmental Certificate issued to ReconAfrica for all petroleum

J. Arkert

exploration activities in Kavango, Namibia. Furthermore, I request that a transboundary Strategic Environmental Assessment that includes the potential cumulative impacts of oil and gas activities within the PEL 73 exploration area and beyond are conducted.

Due to the vested interests, lack of objectivity, and blatant disregard for the environmental regulations of the Republic of Namibia, I also call for the removal of the EAP to from the current EIA process with immediate effect.

[redacted]

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To the attention of:

Dr Sindila Mwiya

Environmental Assessment Practitioner

Risk Based Solutions (RBS) CC

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From:

Natural Justice

louis@naturaljustice.org and/or melissa@naturaljustice.org

Comments on the Draft Environmental Scoping Report to Support the Application for Environmental Clearance Certificate (ECC) for the Proposed 2D Seismic Survey covering the Area of Interest (AOI) in Petroleum Exploration License (PEL) No. 73, Kavango Basin, Kavango West and East Regions, Northern Namibia.

About Natural Justice:

Natural Justice: Lawyers for Communities and the Environment is a non-profit organisation specialising in environmental and human rights law in Africa – with a focus on the pursuit of social and environmental justice for local and indigenous communities.

Natural Justices offers direct support to local and indigenous communities impacted by the ever-increasing demand for land and resources, through legal empowerment. Natural Justice also conducts comprehensive research on environmental and human rights laws, as well as engaging in key national and international processes with, for and alongside indigenous peoples and local communities.

Natural Justice is working directly with several communities living within or near the licensed area in both Namibia and Botswana.

By virtue of sec. 23 of the EIA Regulations, Natural Justice, a registered I&AP, submits the following comments consideration and response by the Environmental Assessment Practitioner ("EAP") and submission to the relevant competent authorities as per sec. 7(1) and 7(2) of the EIA Regulations. Please confirm receipt hereof.

1. **Failure to perform the work relating to the application in an objective manner.**

By virtue of Sec. 4(b) of the EIA Regulations, the EAP is bound to perform the work relating to the application in an objective manner. The report includes no statement of impartiality. In the statement of qualifications of the environmental assessment practitioner, it is stated that Dr Sindila Mwiya is "fully aware of all the competing interests [to energy companies] and niche

donation-based business environmental advocacy opportunism that exists in the resources sector from the local, regional, and international perspectives." This seemingly biased criticism towards environmental advocacy was also clear in comments made throughout the public consultation process. Conjunctively with his background predominantly focused on fossil fuel developments, this raises important concerns as to the impartiality of the EAP. As a professional appointed to conduct the EIA, the EAP is required to act objectively and professionally in the exercise of his functions. The report includes no statement of impartiality. His personal opinions cannot at any time and in any way impinge on his work. This predisposition may also unduly affect the information given to both decision-makers and affected communities. The law is clear – work must be performed in an objective manner "even if this results in views and findings that are not favourable to the applicant." At this stage, the documents prepared by the EAP, do not, on the face of it, appear to have been prepared by an EAP acting impartially in the best interest of the environment. Ecological sustainability and the protection of the environment for the Namibian people is embedded in the Constitution, hence environmental concerns raised by experts and the public alike cannot and must not be discredited and set aside by the EAP. A national certification system for environmental assessment practitioners is being considered to promote best practice. In the meantime, the Environmental Assessment Professionals Association of Namibia ('EAPAN') and its code of conduct provides guidance on best practice. The EAP is not a registered member of EAPAN. If he was, he would have breached the very first rule of its code of conduct. The International Association for Impact Assessment also stated that the EAP's conduct during the public consultation process contradicted their code. Considering the scale and possible impact of the project, it is imperative that best practice is strictly adhered to.

2. The compartmentalization of the EIA process hinders communities' understanding of the risks associated with the Application.

Affected communities must have an understanding of the compound effect of all exploration phases. It is principled in the *Environmental Management Act no 7 of 2007* ('EMA') that: "the participation of all interested and affected parties must be promoted and decisions must take into account the interest, needs and values of interested and affected parties." To promote participation, sufficient information should be provided as to what may impact them in the future.

Due process would require a Strategic Environmental Assessment ('SEA') to be conducted to provide a clear and comprehensive understanding of the project for both government, society and companies, as was for instance done for the uranium mining in the Erongo region. The size and significance of the petroleum exploration and the potential subsequent production call for a holistic approach to this environmental assessment. An SEA, which would assess all aspects of both the exploration and production phases, is internationally recognised as a best practice tool to support decision-makers and stakeholders to reach an informed decision on oil and gas developments. The current fragmented approach does not provide a sufficient basis for affected communities to reach an informed conclusion about how the environment and their livelihoods will be affected, and consequently to participate meaningfully in the process.

The law recognises that "community involvement in natural resources management and the sharing of benefits arising from the use of the resources, must be promoted and facilitated" (s.3(2)(b) EMA). Likewise, both the precautionary principle and prevention principle are enshrined in Namibian law (s.3(2) EMA): "(k) where there is sufficient evidence which establishes that there are threats of serious or irreversible damage to the environment, lack of full scientific certainty may not be used as a reason for postponing cost-effective measures to prevent environmental

degradation;" and "(l) damage to the environment must be prevented and activities which cause such damage must be reduced, limited or controlled." An SEA provides a cost-effective measure to appropriately assess the potential risks of environmental degradation and the corollary impact on local populations, and how to prevent, reduce, limit or control it. Furthermore, the EMA states that "Namibia's cultural and natural heritage including, its biological diversity, must be protected and respected for the benefit of present and future generations" (s3(2)(g)). Intergenerational equity and the protection and restoration of biological diversity, cultural and natural heritage cannot be duly preserved in the absence of a holistic assessment of the exploration project and potential production. The current unnecessarily fragmented approach is misleading. The entire life-cycle of the project should be taken into consideration.

Accordingly, impacts on communities, heritage and culture, water resources and biodiversity for the full exploration activities are not assessed in the Report, and remain a significant concern.

3. **Failure to mitigate for the adverse effects of the COVID-19 pandemic on public consultation.**

In its stakeholder consultation plan, the Report fails to acknowledge and adapt to the constraints on public gatherings caused by the current COVID-19 crisis. Public and community meetings were limited in time and attendance, and cannot be considered sufficient or satisfactory. Travelling is still not recommended making active participation more difficult. Live streaming was not set up for all consultations, and not all I&APs are able to participate in online fora, particularly because the level of electrification and internet access in the region is one of the lowest in Namibia. The process should not go ahead until the circumstances allow for fair, safe and sufficient public consultation where all interested parties can provide an input to be registered. These limitations must also be acknowledged and addressed in the Report.

4. **Failure to sufficiently consider the non-action alternative, and renewable energy alternatives.**

Para. 5.4.2(v) on the no-action alternative is poorly drafted, and appears to be influenced by bias and based on flawed assumptions. Contrary to what is advanced, the negative environmental impacts of the proposed petroleum exploration activities will to a large extent occur in addition to, rather than instead of, other negative environmental impacts from other current and future land uses. Certain impacts listed will also be exacerbated by these activities (e.g. land degradation due to droughts, erosion). It also assumes that no other development project could take place in the area. The current Report may as such be misleading to decision-makers and affected communities. It also fails to discuss renewable energy alternatives, which could bring similar socio-economic benefits without threatening the health of local communities and the surrounding environment.

5. **Failure to promote meaningful participation of indigenous/vulnerable/marginalised local communities as potential stakeholders.**

The Constitution requires that the state shall "actively promote and maintain the welfare of the people by adopting policies which include the maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilisation of living natural resources on a sustainable basis for the benefit of all Namibians" (art. 95(1)). Inadequate consultation with the custodians of the land contravenes the aforementioned.

The area is of high cultural significance to numerous indigenous communities whose livelihoods directly rely upon its fragile ecosystems, such as San communities, who have already voiced their concerns about the proposed exploration. Their interests should be considered *ab initio* in the scoping report rather than at a later stage.

The Report fails to indicate that any meaningful consultation has taken place with indigenous/vulnerable/marginalised communities to understand their concerns and to assess impacts relating to heritage and culture. No decision on the application should be considered until their concerns are fully accounted for and addressed.

6. **Inadequate stakeholder consultations.**

The Report states that "The project team will focus heavily on working with the regional, local and traditional leaders who will be responsible for informing their local communities about the proposed activities." It fails however to provide concrete measures as to how meaningful participation will be achieved, besides community meetings, and how the views and concerns of the communities will then be understood and addressed. It is also unclear as to which measures will be taken to ensure that groups/persons who don't have the capacity to participate, or where local culture may inhibit effective and meaningful participation, are adequately supported in their will to participate in stakeholder consultations. It is imperative that the stakeholder participation process ensures that all interests, including those from non-represented or underrepresented groups, are respected regarding the distribution of impacts, compensation and benefits. The participation or defence of the interests of less represented groups including indigenous peoples, women, children, elderly and poor people should be encouraged regularly.

7. **Misrepresentation of impacts associated with future phases of the exploration**.

The EAP repeatedly expressed that this Report focuses solely on the proposed 2D seismic survey (page XI; 2), and that discussions as to the environmental impacts associated with later stages of the exploration fall outside the scope of this assessment. Yet, the socio-economic benefits of future exploration and production are discussed in different places (e.g. para 5.4.2).

The potential benefits of future developments cannot be presented without discussing the potential associated risk. By virtue of s.4(d) of the EIA Regulations, the EAP is required to disclose all material information in his possession which may influence decision-making. As per s.8(h), the EAP must provide "a description and assessment of the significance of any significant effects, including cumulative effects, that may occur as a result of the undertaking of the activity or identified alternatives or as a result of any construction, erection or decommissioning associated with the undertaking of the proposed listed activity". The Report falls short on this obligation by failing to sufficiently discuss the associated risks. An SEA would provide a much clearer picture as to both the benefits and risks of oil and gas exploration and production in comparison to alternatives.

8. Failure to sufficiently assess the exploration impact on tourism.

Tourism is an important industry in the area. The project may significantly impact tourism by interfering with the unique local ecosystem and damaging the international image of the area as a pristine, preserved region. The socio-economic consequences of this for local communities are not sufficiently considered in the Report.

9. Failure to account for the transboundary nature of the project.

Although there are no explicit requirements in the EMA or the EIA Regulations to consider trans-boundary impacts in an EIA, Namibia is a signatory to several trans-boundary agreements which require sharing of information e.g. Orange-Senqu River Commission, the Okavango Commission, the Benguela Current Commission, the Permanent Joint Technical Commissions with Angola (Kunene River) and South Africa (Orange River), as well as some trans-frontier conservation initiatives such as the Kavango-Zambezi Transfrontier Conservation Area. In the light of the above, it appears clear and crucial that an SEA taking into account the transboundary effects of the project should be conducted.

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29 January 2021

Dear Mr. Mufeti and Dr. Mwiya,

RE: ReconAfrica's Seismic EIA Scoping

We have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia.

This letter serves to register concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. We are concerned that:

1) Consultations with community members, specifically members of the San communities in the area, who are in part extended members of communities found in the Nyae Nyae and N‡a Jaqna Conservancies that we support, appear to be limited in inclusion and scope. As you'll appreciate, the most marginalised communities in any area are likely to have limited inclusion and benefits.

2) We would like clarity on whether there is a possibility of site access through Kanovlei in N‡a Jaqna Conservancy, which would bring environmental and social impacts to the Conservancy.

3) Given the "resource curse" economics widely acknowledged with oil producing countries, any potential benefits of the project for communities should be clearly defined AND potential negative impacts clearly illustrated, rather than more generic promises of "jobs and development" that seem to have been presented to communities thus far.

4) Limitations of the COVID-19 pandemic to safe and accessible consultations on this important matter.

We look forward to addressing these issues in more detail at a later date.

Yours sincerely,

Saskia Sheehama
Director NNDFN

Registered Interested and Affected Party
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28 January 2021
Submission: ReconAfrica's Seismic EIA Scoping Report

Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya, Environmental Assessment Practitioner (EAP),

I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia.

I am sending this letter to formally register my concerns about ReconAfrica's application for an Environmental Clearance Certificate to conduct seismic testing.

Given the disastrous global track record of the fracking and oil industry in terms of human rights violations and ecological destruction, and of course climate change, my concerns are many.

In the specific case of ReconAfrica's planned seismic testing, my concerns include the following:

1) The potential impacts on wildlife, including endangered species, and the ecosystems people's livelihoods depend upon

Namibia is recognized globally as a very unique tourist destination, which both creates jobs for the local people and revenue for the country while protecting Namibia's rich natural and cultural heritage, for generations to come. The scoping report says that *"No removal of protected species or mature trees are anticipated because the activity will require the widening of the existing tracks as may be applicable" (page 80).*

However, considering there are protected species in the license area, we question this claim for the following reasons:

- ReconAfrica plans to penetrate 450km into wilderness areas using large trucks, widening roads to access the license area. The photo of Line EW5 on Plate 1.24 (page 37) of the Scoping Report clearly shows this. In order to widen the roads hundreds of trees would need to be destroyed.
- There is no consideration of the impact on other species in this area and the overall biodiversity of the ecosystem.
- Nor is there any reference to the fact that some of the tracks are in or near the Omatako River, plate 1.21 (page 34) and the impact this would have on this ecosystem.
- In the context of worsening climate change, what is the impact of destabilizing such a fragile area for biodiversity, the water system and hence the people whose lives depend on this ecosystem?

We know from other experiences that when roads penetrate into such fragile areas there are many consequences such as enabling access for poaching. All of these unaccounted for impacts would further undermine local livelihoods and cohesion, Namibia's iconic tourist industry, and in turn the government's revenue. Supplying some boreholes to local people is not going to compensate for an intergenerational impact. There is no assessment of these interconnected consequences.

We therefore ask you to set aside this Environmental Clearance Certificate request until proper and exhaustive scientific studies on all foreseeable impacts can be done.

2) The barriers to citizen participation, consultation and consent processes

Given the concerns above, and that people living in Kavango East and West, who will be affected, have limited if any internet access, what effort has been made to inform and consult them? How are the many communal farmers and communities expected to respond to the call for registration as an Interested and Affected Person for ReconAfrica's Seismic EIA when the only means is via an internet address? And what about those who do not speak English?

Beyond issues of technological and linguistic access, the current COVID-19 restrictions on peoples' freedom to travel and gather - whilst medically justified- are another barrier to citizens' meaningful participation in this vital Seismic EIA process.

We understand that despite these extraordinary circumstances, the EAP has also shown unwillingness to live-stream public consultations for people to attend safely. This combined with the other factors outlined above, means that the vital inclusion of registered interested and affected parties, has not and cannot go ahead freely or fairly.

The people of the Kavango region have a legally mandated right to understand and comment on this huge oil and gas development that could impact them and their families for the rest of their lives and generations to come. Yet at this time, they are being denied that right.

We ask that ReconAfrica's Environmental Clearance Certificate application be put on hold until such a time as local people can be fully informed, have their input registered and their rights realised.

We would also urge Namibia to accord its people the full, globally recognised right not only to consultation, but to Free Prior and Informed Consent, as enshrined in the UN Declaration of Indigenous Peoples, in this and all future licensing processes.

With good leadership and respect for due process and citizens' rights, Namibia can avoid repeating the mistakes of many administrations of the past around the world who - due to mismanagement and oil extraction's inherent destructiveness- have seen their dreams of prosperity turn into an oil nightmare.

Rushing through permitting processes on the basis of an incomplete Scoping Report, in the midst of a global pandemic and in some of the world's most important wilderness is an unconscionable and reckless approach to an issue of this magnitude.

For the sake of Namibia's citizens, and the lands, waters and wildlife they and future generations rely upon, and the impact of this proposed project on climate change, I urge you to take heed of this and other requests to put ReconAfrica's ECC application on hold.

Sincerely,

Registered Interested and Affected Party

Liz Hosken, Director, The Gaia Foundation

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Mr. Oliver Freyer
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Windhoek

Mr. Timoteus Mufeti
Environmental Commissioner
Ministry of Environment and Tourism
Private Bag 13306
Windhoek

29. January 2021

Dear Mr. Mufeti

Dear Dr. Mwiya

Re: ReconAfrica's Seismic EIA Scoping Report

I have registered as an Interested and Affected Party (I&AP) for the Environmental Impact Assessment (EIA) conducted by Risk-Based Solutions (RBS) CC on the behalf of Reconnaissance Energy Namibia (Pty) Ltd (under ReconAfrica), regarding the seismic survey operations in Petroleum Exploration License (PEL) No. 73 in the Kavango East and -West regions of Namibia.

This letter is to formally register my concerns about how the EIA process is conducted, as well as the potential impacts of the proposed activities if the application for an Environmental Clearance Certificate (ECC) would be approved. I would like to point out, that

1) Considering the scope of what ReconAfrica claims to be a "major onshore oil discovery", the current method of applying for individual ECC's for each phase of the project is not enough. I am afraid that, by using a step-by-step approach, the overall negative impact on people and biodiversity is not recognised. In my opinion, a Strategic Environmental Impact Assessment (SEA) is needed, covering the entire lifespan of the project.

2) The current limits to travelling and gathering in groups, due to COVID-19, is reducing the amount of citizen participation. This is exacerbated by the fact that people are not enabled to participate in public consultations for the proposed activities. I suggest postponing the application until after the pandemic has ended in order to allow a fair chance of affected people to be heard.

3) While ReconAfrica claims to use existing road through the wilderness, it will be inevitable to widen them, cutting down a considerable number of trees along a 450 km distance. What effect does this have on bird species, on erosion close to watercourses

(the drilling site being in the Omatako River), and on increased access by potential poachers, to name the least?

4) Putting it into a global perspective and considering the efforts and promises Namibia made in its Intended Nationally Determined Contributions (INDC's) to move away from fossil fuel intensive energies, this project goes against what Namibia stands for. This, in addition to the country's relationship to the Green Climate Fund, should be considered as well.

Thank you for considering these issues. I sincerely hope that the best science and citizen engagement will be applied to the decision making process.

Sincerely,

Oliver Freyer

Global Risk Governance programme

Public Law Department

Law Faculty
University of Cape Town
Private Bag
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29 January 2021

Written submission in response to Risk Based Solutions' draft scoping report for 2D seismic survey in PEL 73 by Reconnaissance Africa

1. Introduction

This written submission is made by Dr Annette a senior research fellow with the Global Risk Governance Programme in the Law Faculty of the University of Cape Town in response to the draft scoping report for Reconnaissance Africa's 2-D seismic survey in PEL 73.

2. Biographical details

Dr Annette Hübschle is a senior research fellow within the Global Risk Governance Programme (GRG) within the Department of Public Law in the Law Faculty at the University of Cape Town. The programme's research activities are focused on understanding the new and emerging risk landscapes that are shaping 21st Century securities. Of particular concern are the environmental insecurities associated with the impacts of industrialisation on earth systems. Hübschle leads the Environmental Futures Project within GRG. She grew up in Namibia and continues to conduct much of her research and fieldwork in Namibia and neighbouring countries. A current research project explores the role of local and indigenous communities in conservation and how to center communities as fulcrum institutions in policy and beneficiation processes. The project involved fieldwork across Namibia including in PEL 73. Hübschle is a member of the IUCN Commission on Environmental, Economic and Social Policy, the IUCN Species Survival Commission on Sustainable Use and Livelihoods Group and several other academic, expert and policy groups.

3. Disclosure of interests

I have no direct business, financial, personal or other material interests in the outcome of this EIA.

4. Comment on staggered EIA process and cumulative impact

It is noted with concern that the petroleum licensing process has been staggered into separate EIA processes for the drilling of exploratory wells, the seismic survey, and possibly, further applications should viable oil or gas reserves be found. Up to this point IAPs and the general public have not been afforded the complete picture of the cumulative environmental impacts of establishing an oil field at a yet to be defined location in the Kavango regions and neighbouring Botswana. The EIAs of the overall project should be weighed up as a whole instead of splitting it up into smaller 'projects' which according to the EAP show no or negligible impacts.

5. Request for specialist reports denied

The environmental assessment practitioner Dr Sindila Mwiya is an expert in geology and geotechnical engineering. He would have had to obtain specialist reports/expertise on the environmental (fauna and flora), community, health, social and livelihood impacts of the seismic survey. The draft scoping report mentions specialist reports and that fieldwork was undertaken (p.76). As a registered IAP, I requested these specialist reports and details of consulted experts on 28 January 2021. Dr Mwiya refused to send the requested information (see Addendum A) thus contravening clause 21 (6) (a) and (b) of the Environmental Impact Assessment Regulations. Dr Chris Brown of the Namibian Chamber of the Environment confirmed via email that transparency, full disclosure, honesty and professional competence are at the heart of the EIA process in Namibia and that the EAP should enable full disclosure of project documentation.

6. Public participation process

A public notice was placed in the New Era newspaper on 7th January 2021 inviting stakeholders and IAPs to attend the information sessions. The notice indicates that both "formal meetings" and "afternoon sessions" were to be held at Rundu on Friday 22nd January 2021, followed by field-based public meetings in the area on Saturday 23rd to Monday 25th January 2021. Whilst the reasons for restrictions in numbers of attendees and times that have to be applied to these meeting are fully understood in terms of the prevailing COVID-19 restrictions, this cannot be used as an excuse for ReconAfrica to limit public participation. Additional meetings should have been arranged at each venue to enable participants to become familiar with the project and to voice their concerns. Alternatively, these meetings should be moved to a future date when COVID-19 related regulations allow social gatherings of more than 50 people meeting for longer than two hours in safe conditions.

Furthermore, the notice in the New Era made special mention of "specifically targeting the regional and local communities….". Several field-based public meetings were cancelled due to heavy rains, leaving community members waiting after having travelled long distances. It remains unclear whether the meetings have been postponed or cancelled altogether. Not only is this

disrespectful to the most directly affected people but also a breach of Namibian environmental legislation. Moreover, due to limited cell phone signal and communication channels during the recent heavy rains, many affected community members are unaware of the planned work and consultations by ReconAfrica. The current EIA process cannot be considered as inclusive, transparent or democratic without the voice of these communities being heard.

Although ReconAfrica has agreed to two meetings to be held in Windhoek on 2 February 2021, no provision has been made for vulnerable people with comorbidities or in high risk categories and IAPs from neighbouring countries or elsewhere in the world to join the consultative process on-line. It is recommended that virtual meetings be held via zoom or similar platforms. As the public participation process serves the purpose of informing IAPs about the project, the closure date for written submissions on 29 January 2021 should be extended to a future date once the consultative meetings have been completed.

7. Impact on community conservancies

The draft scoping report fails to mention that two Community Conservation Areas (CCA) will be directly impacted by the proposed 2D seismic survey. The northern portion of seismic line NS 2 traverses through Kapinga Kamwalye Conservancy (No. 84) and also follows the eastern boundary of the southern portion of the same conservancy. Similarly, seismic line NS 3 follows approximately 25km of the George Mukoya Conservancy (No. 41) western boundary. Frack Free Namibia and Botswana received feedback from affected community members and the chairperson of the Kavango East and West Regional Conservancy & Community Forestry Association, Max Muyemburuko, who stated that they were not consulted or notified of the intended project. When denied an opportunity to raise appropriate questions at the Rundu meeting on 22 January 2021, Mr Muyemburuko forwarded his questions by email to the EAP. No comprehensive reply was received to the fair and legitimate questions instead the EAP accused Mr Muyemburuko of acting in the interest of foreign nationals (Steffen 2021).

It is important to note here that conservation on state and communal land in Namibia is the legal responsibility of the Ministry of Environment and Tourism (MET). The 1996 amendment to the Nature Conservation Ordinance of 1975 formally recognized the devolution of rights to communities over natural resources, including income from wildlife and tourism. These rights are exercised through Namibia's communal conservancies, and as such, conservancy members, beneficiaries and employees should be considered crucial IAPs to be informed and consulted about the planned project, potential follow-up phases and cumulative impacts of the overall project.

8. Fauna and flora

The draft scoping report states that fieldwork was carried out to supplement the desktop specialist studies that were conducted for the initial drilling EIA. No copies of the original studies were made available to IAPs. The EAP also declined to provide IAPs with copies of the field studies that were conducted during November and December 2020 (compare with complaint raised under 5).

It is of uttermost importance that a comprehensive and inclusive fauna and flora survey is conducted for the seismic survey. From a scientific perspective, the EAP has to consider seasonal variations which affect migrant birdlife and mammals as well as the presence of invertebrates, reptilians and charismatic megafauna (with a special focus on elephants – also see

9) in order to present a baseline presence of fauna and flora in the region. Variations in population numbers, migration patterns, breeding seasons and cycles as well as blooming, fruiting and dormancy in plants must be considered. PEL 73 is home to several endangered species including African wild dogs, pangolins, spotted rubber frogs, dwarf pythons, white-backed vultures and many others. Conservation scientists specializing in the study of these often endemic and endangered species should assess how ReconAfrica's proposed seismic survey would impact species survival, regeneration, reproduction and other biological processes. The current sections on fauna and flora lack the required detail and evaluation.

9. Expert impact assessment on resident and migrating elephant populations required

It is imperative that the EAP draw upon the expertise of elephant experts to assess and evaluate the potential impact of the 2D seismic surveys upon resident and migrating savanna elephant populations within and adjacent to PEL 73 prior to the 2D seismic survey being conducted.

Elephants vocalise by means of deep rumbles that produce seismic energy and Rayleigh waves that enable elephants to communicate over long distances (Günther/O'Connell-Rodwell/Klemperer 2004). These vocalisations are in the frequency range of 15 to 30htz and include contact calls and answers, and warning calls. Breeding males use infrasonic communication to locate and breed with receptive females. The accelerated drop weight (ADW) that ReconAfrica propose using will produce seismic waves in the frequency range that elephants can detect and is likely to inhibit communication, which will be particularly relevant in the areas adjacent to Khaudum National Park and the George Mukoya Community Conservation Area as breeding herds of elephants occur in both these areas. The ADW has not been used previously in Namibia and in particular in areas inhabited by elephant herds.

It is also uncertain how the seismic survey will affect elephant transboundary migration and ranging patterns. From two studies conducted in Uganda's Murchison Falls National Park (MFNP), we know that oil exploration and seismic surveys negatively impacted elephants (Plumptre/Ayebare/Mudumba 2015; Wildlife Conservation Society Uganda 2015). Elephants were shown to move away from well pad sites while under construction and when they were being drilled as much as 5 kilometres away from the pad. Elephant movement behaviour changed in the vicinity of well pads or seismic activity including moving shorter distances in a day except when traversing areas where oil activities were taking place.

10. Concluding remarks

The draft scoping report for ReconAfrica's 2D seismic survey lacks the required depth, evidence-based evaluation and analysis to pass muster. The EAP and ReconAfrica have not followed due process in terms of providing IAPs with the required information (specialist reports) and arranging sufficient public and local community participation. The Environmental Commissioner should reject the application for environmental clearance.

References

Günther, Roland/Caitlin O'Connell-Rodwell/Simon Klemperer, 2004: Seismic waves from elephant vocalizations: A possible communication mode? In: *Geophysical Research Letters - GEOPHYS RES LETT* 31.

Plumptre, Andrew/Samuel Ayebare/Tutilo Mudumba, 2015: *An Assessment of Impacts of Oil Exploration and Appraisal on Elephants in Murchison Falls National Park, Uganda*.

Steffen, Frank, 2021: Kavango ist nicht ökologisch sensibel. In: *Allgemeine Zeitung*, 28 January 2021.

Wildlife Conservation Society Uganda, 2015: *Evaluation of oil impacts on elephants shows changes in their behaviours*<https://uganda.wcs.org/DesktopModules/Bring2mind/DMX/Download.aspx?EntryId=30390&PortalId=141&DownloadMethod=attachment>

Addendum A:

From: Annette Hubschle <Annette.Hubschle@uct.ac.za>
Sent: Wednesday, 27 January 2021 9:42 AM
To: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Cc: Sindila Mwiya <smwiya@rbs.com.na>; Chris Brown <ceo@n-c-e.org>; Corinna van Wyk <cvanwyk@lac.org.na>; maxi@nacso.org.na
Subject: Request for specialist reports and details of experts consulted
Importance: High

Good morning Dr Mwiya

The Draft Scoping Report for the 2D seismic survey makes reference to specialist studies including fieldwork (p 76).

Could you please share these studies and provide details of the experts that conducted these studies and the fieldwork?

Many thanks for your assistance

Annette

Dr Annette Hübschle
Global Risk Governance Programme
Faculty of Law
University of Cape Town
Email: a.hubschle@uct.ac.za | Mobile: +27 (0) 73 171 2841 |
LinkedIn | Twitter | Academia | Researchgate

Recent publications:

Mackenzie, Simon, Annette Hübschle and Donna Yates, 2020: Global Trade in Stolen Culture and Nature as Neocolonial Hegemony *The Emerald Handbook of Crime, Justice and Sustainable Development.* Emerald Publishing Limited. https://doi.org/10.1108/978-1-78769-355-520201023

Gore, Meredith L., Annette Hübschle et al , 2020: A conservation criminology-based desk assessment of vulture poisoning in the Great Limpopo Transfrontier Conservation Area, *Global Ecology and Conservation*, https://doi.org/10.1016/j.gecco.2020.e01076.

Hübschle, Annette, 2019: Fluid interfaces between flows of rhino horn. In: A. Amicelle, et al. (eds.), *The Policing of Flows: Challenging Contemporary Criminology.* London: Routledge https://www.researchgate.net/publication/318709650_Fluid_interfaces_between_flows_of_rhino_horn

Hübschle, Annette and C Shearing, 2018: Ending wildlife trafficking: Local communities as change agents. Geneva: Global Initiative against Transnational Crime, 2018 http://globalinitiative.net/wpcontent/uploads/2018/08/TGIATOC-Wildlife-Trafficking-Report-WEB-4.pdf

From: Dr Sindila MWIYA <frontdesk@rbs.com.na>
Sent: Thursday, 28 January 2021 06:19
To: 'Annette Hubschle' <Annette.Hubschle@uct.ac.za>
Cc: Christopher Brown <ceo@n-c-e.org>; 'Corinna van Wyk' <cvanwyk@lac.org.na>; maxi@nacso.org.na
Subject: RE: Request for specialist reports and details of experts consulted

Dr Hubschle,

As a so called expert / specialist in oil and gas exploration and on the receiving environment of Kavango West and East Regions that you wholly claim to be and elevated by your uninformed clique, you should know better that the reason I send the Draft Scoping Report to you is for you to provide me with your so called expertise in oil and gas exploration and specifically the proposed 2D seismic survey operations and the receiving environment of the Area of Interest (AOI) in Kavango West and East Regions and by the way please note that the AOI is not inthe Okavango Delta or the Banks of the Okavango River or San Community land.

The Draft Scoping Report has been provided to you and it is not for you come back to me and demand reports and documents that have been cited. Many other documents have been reviewed as part of EIA process for the proposed 2D seismic survey and I am under no obligations whatsoever to now send you all the documents that have been reviewed and yet you claim to be an expert / specialist in oil and gas exploration and on the receiving environment of Kavango West and East Regions and specifically the Area of Interest which you believed was on the banks on the Okavango River.

We are all accountable to the State, not to you, your clique or any NGO or entity whatsoever.

Please provide your technical / expertise inputs to the EIA Process not demands for reports that have only been cited.

Many thanks

Dr. Sindila Mwiya
PhD, PG Cert, MPhil, BEng (Hons), Pr Eng
International Resources Consultant /Founder RBS CC & FGN (Pty) Ltd
Risk-Based Solutions (RBS) CC, Consulting Arm of **Foresight Group Namibia (FGN) (Pty) Ltd**
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Global Office / URL : www.rbs.com.na

Foresight Group Namibia (FGN) (Pty) Ltd – *Perfecting the Future*
Risk-Based Solutions (RBS) CC – *Delivering the Solutions*

From: Christopher Brown <ceo@n-c-e.org>
Subject: RE: Request for specialist reports and details of experts consulted
Date: 28 January 2021 at 14:40:59 SAST
To: 'Annette Hubschle' <Annette.Hubschle@uct.ac.za>
Cc: 'Corinna van Wyk' <cvanwyk@lac.org.na>, "maxi@nacso.org.na" <maxi@nacso.org.na>, Dr Sindila MWIYA <frontdesk@rbs.com.na>, Scot Evans <scot.evans@ReconAfrica.com>, Claire Preece <claire.preece@ReconAfrica.com>, Craig Steinke <craig@reconrecon.com>

CAUTION: This email originated outside the UCT network. Do not click any links or open attachments unless you know and trust the source.

Dear Dr Hubschle,

I apologise for the bad manners being displayed by ReconAfrica's consultant. This does the company no good in terms of PR, undermines confidence in the process and runs the risk of strengthening any resistance and hostility that people might have to the project. Insulting and bullying tactics intimidates no one.

The public is entitled to full disclosure on all aspects of any proposed development (with the exception of very specific intellectual property rights issues related to unique processes, etc). Indeed, proper public consultations are not possible without such disclosure. The whole point of public engagement is to allow the public (from specialists to those with an interest in due process to essentially everyone who is interested in the project or area) to assist the consultant to identify the key environmental and social issues – as well as the public's perceptions of issues – so that these can be properly addressed in the EIA documents. An important part of the process is to allow the public (interested and affected parties) to obtain a level of comfort in the integrity of the process. Hostile responses to simple enquiries certainly do not foster a sense of comfort, but rather raise red flags. Transparency, full disclosure, honesty and professional competence are at the very heart of the EIA process in Namibia. I know, because the national EIA policies and legislation were developed under my guidance at the DEA.

Another point that is not fully appreciated by some consultants is that, when they take on an EIA consultancy, their job is to the represent the best interests of the environment in all its components, including the welfare and rights of both locally impacted people and the whole nation, including future generations. To achieve this requires open, transparent public engagement with full disclosure. I cannot understand why there is resistance to sharing important documents such as the specialist studies and the environmental management plans (EMPs) – these should automatically and unquestioningly be in the public domain.

Kind regards,
Chris

Dr Chris Brown

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NCE democratizes access to environmental information at www.the-eis.com - Namibia's one-stop-shop for retrieving, submitting and publishing environmental information

Contributor: Silke Ahrens

Tel: 061 244 195

Mail: silkeahrens@hotmail.com

Submitted: 29 Jan 2021

At smwiya@rbs.com.na

At frontdesk@rbs.com.na

Written submission to the EIA Public consultation process regarding the currently issued ECC as defined here and referenced below AS WELL AS written submission valid for the 2nd phase assessment, after drilling, in case there are positive results and submission for types of exploration would start. This also serves as contribution to the public participation process for a 2nd EIA pertaining to 2D Seismic survey linked to ReconAfrica's exploratory drilling. It also serves as my current contribution to the to be logged application for ESS Friday 05th Feb 2021, as declared by RBS Team.

Guidance for the submission is amongst others, this EIA report:

Final Environmental Impact Assessment Report Vol 2 of 3 to support the application for Environmental Clearance Certificate (ECC) for the proposed petroleum and Gas exploration operations (Drilling of multiple Stratigraphic Wells) in the petroleum exploration License (PEL) No 73, covering Blocks 1719, 1720m 1721, 1819, 1820 and 1821, Kavango Basin, Kavango West and East Regions, Northern Namibia

Dear Dr Mwiya,

I would like to register as an interested and affected party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all document of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment being used and the contact of the scientists who have carried out the specialist studies.

The concern of the matter is the overall impact of sesmic testing, exploratory drilling; oil exploration; lack of clarity on fracking plans or supposed plans under which term, definition or description they might be stated or implied.

Public engagement including various scientists and experts is important. The legal framework of Namibia has made provision for public involvement in this process and private persons can have a voice in the quest for preservation of persons, animals, livelihoods, water resources, air resources; tourism income source and conservancy management. Ecocide is a term under discussion and it is a sign of the times that the protection of Earth and what is bears has to have its place in considerations this process.

Reviews need to consider plans of ReconAfrica in case there are successful drilling results Multiple countries ad multiple communities; cross-border impact.

This is a concern in terms of stakeholder engagements: How are citizens educated and informed of the impact of the project: by whom; in which way and language. Who chooses the

translators; who ensure the information is objective; science explained and time provided for critical analysis and insights.

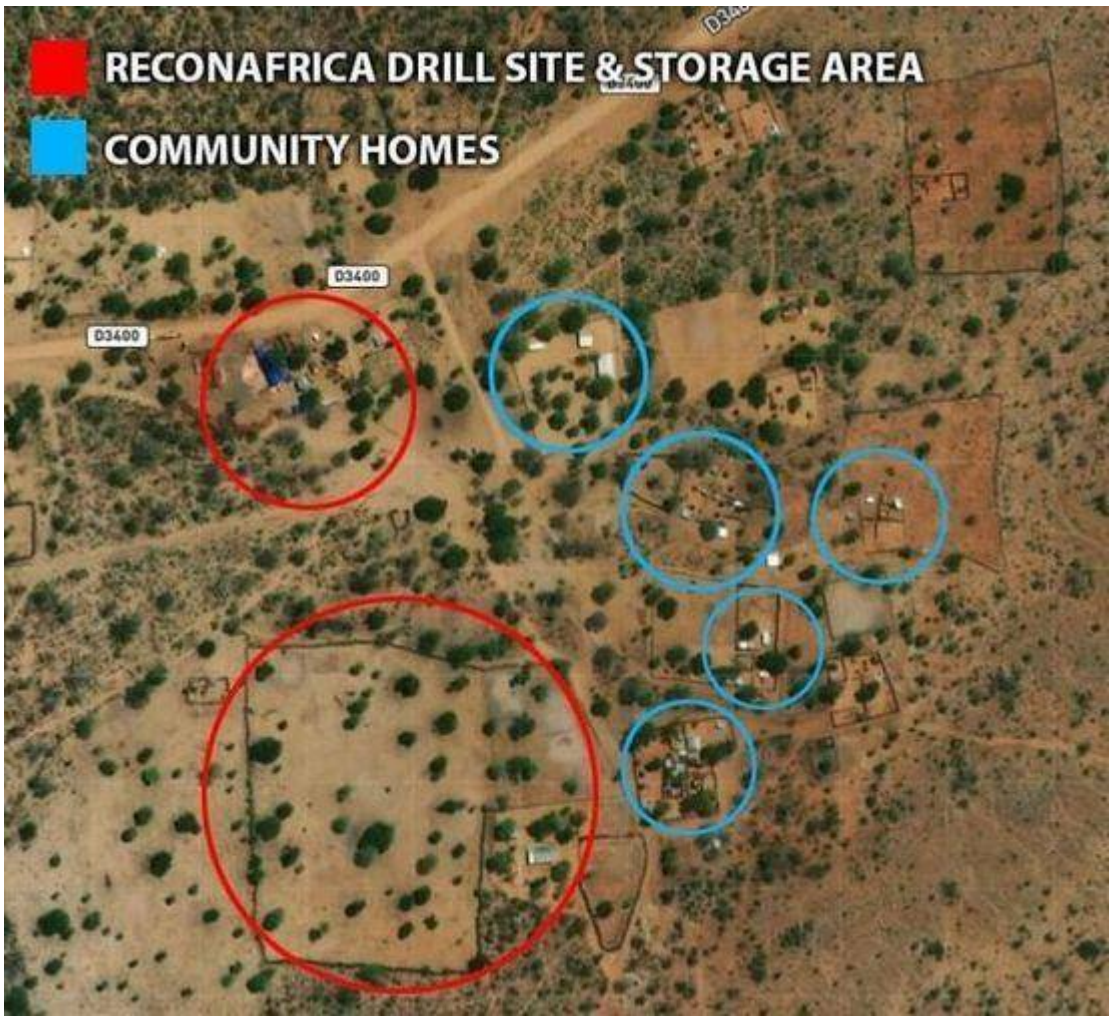
My submission is not conclusive and independent scientific assessment and research of the impact important.

Referring to the Draft Environmental Scoping report to support the application for ECC for the proposed 2D Seismic Survey covering Areas of Interest PEL 73, Kavango Basin: 134 pages of scientific information need to be verified, examined and discussed in detail und all available scientific information / required independent research / relevant considerations of applicable national and international laws. This work is beyond the purpose and scope of this submission.

I am not a scientist. I am a member of the public. If I do interpret statements in error, it is done in good faith.

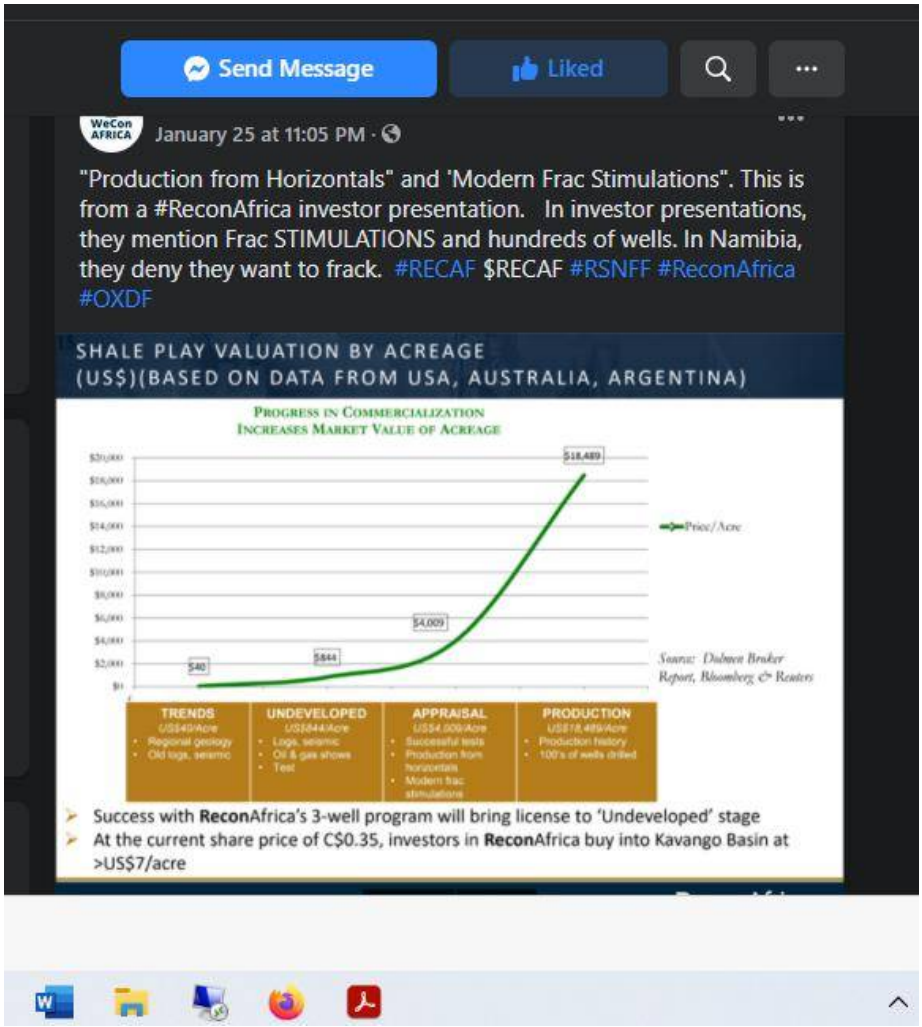
Question 1, Picture 1

Drilling Sites near Communal Areas: please explain the consultation process with the communal farmers. As concluded in the recommendations of the EIA document, these are in distance between 500 – 1000m?



(1) Re-Con Africa | Facebook Source

Question 2, Picture 2



Relates to	Detail	Remark
Question 1 Picture 1) Drilling sites and communal farmland	Drilling near Communal Farmland	Please provide evidence of public consultation process with local community. Communal Land Reform Act
Question 2, Picture 2 Excerpt from Recon Investor Presentation, Page 16, Sept 2019. Fracking and horizontal drilling	Recon investor Presentation Jay Park QC, CEO Jay.park@Reconafrica.com ReconAfrica.com	Please explain the conflict between investor presentations indicating fracking and horizontal drilling vs the statements that no

(based on a Bloomber-developed presentation on market value proposition stating examples of generic development and operations per step of investment. However, statements remain and need to be clarified (Will Traylor)		drilling/fracking will take place.
		In case there is fracking, based on the investor report plans, why are these plans not clarified. As Mr Traylor commented on question to the above by the public in a forum, Picture 2 is a generically development Bloomberg Presentation. It does reference Kavango Basin though. Please clarify use of terminology and exact plans.
Question 3 Sediments in this area lay vertical.	How are vertical sediments explored?	How is exploration in communal land next to planting fields is environmentally and economically save. The process is described as save. Is there an independent scientific confirmation?
Question 4 Effect on Aquifer(s)	Measurement and data of fracking fluid, flow-back waste recording Analysis of waste water	EIA points out that potential liability exists. I would like to know more about the complete risk to the aquifer, its connecting waterways and how the operators plan to anticipate problems; involve science; make an informed risk assessment before any exploration may happen.
	Omuramba Omatako is a tributary of Kavango River.	I would like to understand better how the effects of this is on downstream areas and Okavango details
Question 5 International, Independent Scientific research and critical, constructive exchange is essential	Concernedhealthny.org article: Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking (Unconventional Gas and Oil Extraction)	Reports and international scientific research and discussion is expected in this process.

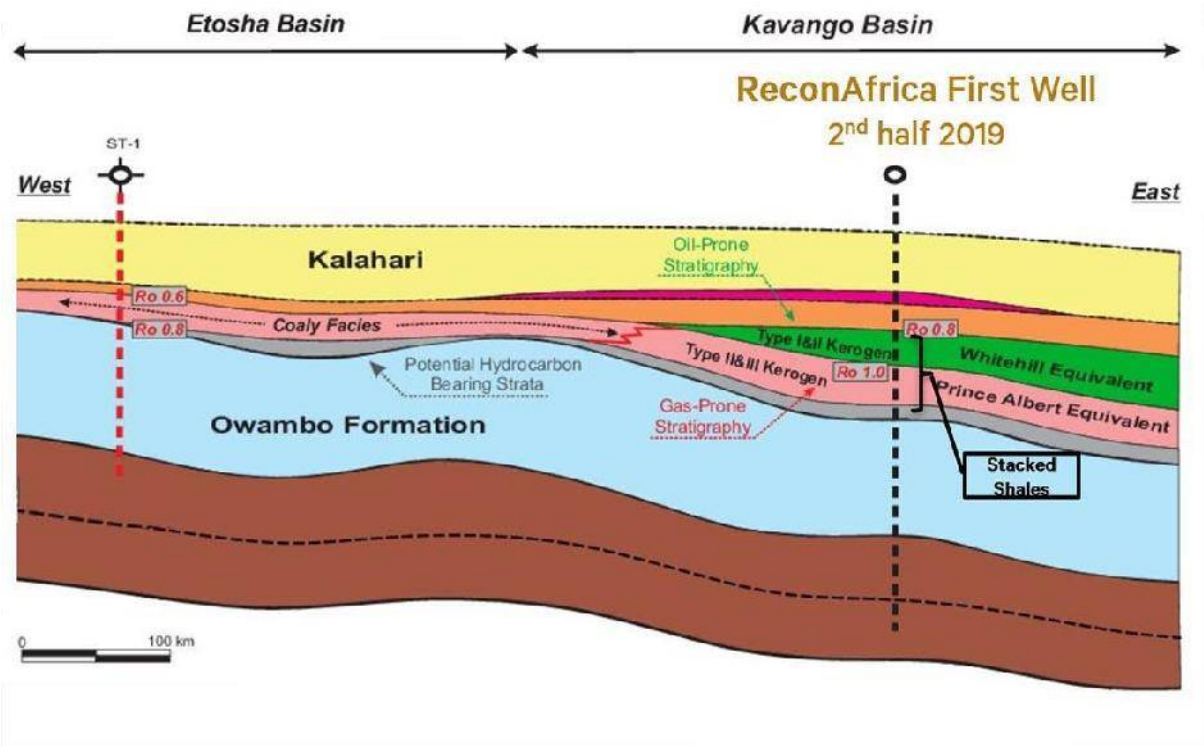
Question 6 **Public stakeholder engagement follow up:** KERFU Kavango East and West Regional Conservancy and community forest Association Letters 27. October 2020 Source: Stockhouse.com kenya@namibiansun.com Article from Nov 20, 2020 Reconnaissance Energy Africa Ltd | V.RECO Stock Message Board & Forum | Stockhouse	“”Fact were presented during a marathon meeting, during which all parties agreed that there was no danger re the planned operations. Confirmation after meeting that no fracking will be conducted. The stakeholders were united in the hope that if oil was discovered, it will have a positive effect on the economy. While many stakeholders said they did not understand the process as they only read negative headlines, ReconAfrica Deputy General Manager Yuri Martinez and Minister Alweendo’s delegation schooled the concerned group on what the project entails	Stakeholders who did not understand the process were briefed by representatives of the company that wants to action the operations and the ministry that supports the project. **Question to RBS** How is understanding of these highly complex plans gained in one stakeholder engagement, conducted by supporter of the project. Copies of protocol of meeting and information presented can be accessed where? Did the information also discuss the process after the exploratory drilling and is this protocolled.
Question 8	7 ways oil and gas drilling is bad for the environment | The Wilderness Society (on dangers of hydro Carbon Exploration)	-Drilling disrupts wildlife habitat -Oil spills can be deadly to wildlife -Air and Water pollution hurt local communities -Dangerous emissions contribute to climate change -Oil and gas ruins pristine landscapes -Fossil fuel extraction turns visitors away -Light pollution The article is self explanatory.

Question 9 Wood McKenzie Report states hydrocarbon exploration data (amongst other) McKenzie reference to: Q1 2021 2DSeismic Campaign and 3 drilling wells	7251_ncea_final_review_eia_scoping_report_2d_seismic_keta_delta_block-ghana.pdf The report refers to the ecological impact of 2D Seismic Campaigns. All my questions are relevant to this scientific document. Please note, there is no reference to Q1 2021 in the EIA as published by Dr Mweya. Mention of Q1 2021 I could only find in the Wood McKenzie Article. **Remarks** How is the Wood McKenzie report relevant to the current plans and is it part of the current ECC or part of the process of the (supposed) next application for an ECC allowing for further exploration.	
Question 8 Presentation OGGN & API Houston Chapter: The opening of the Deep Kavango Basin November 10th 2020 Presentation, involvement of Craig Steinke Dan Jarvie Bill Cathey Scot Evans	"after benefit of sub surface insights, he realized what Recon was sitting on"… Claire Preece: Her statement of fracking not being applicable to the exploration license is contradicted by statement of CEO Scot Evans that possibility of modern fracking can be used, if exploratory drilling looks promising.	I did not have time to analyse the full content of the presentation to investors. As applicant, ReconAfrica needs to be prepared for post-exploratory drilling findings and thus the whole process is under discussion. Not just the current explorative drilling and seismic testing ECC.
Question 9 National Geographic Article, dated 28 Jan 2021 Oil drilling upstream of Okavango Delta moves closer to reality (nationalgeographic.com) Amongst others: Impact of Seismic drilling on elephant populations	"Recon Africa's map of the planned seismic survey shows that part of it will run along the entire western border of the George Mukoya Conservancy. Jacob Hamutenya is the conservancy's chairman. He says he had heard nothing about the seismic testing plan and fears for his community and the elephants that attract tourists to his area." George Mukoya Conservancy states that they were not consulted on seismic testing plans and impact on elephants, community, tourism, fauna, flora and domestic animals.	Not all communities and conservancies feel fully informed. More stakeholder engagements are required and more time is required to follow-up on these concerns.
	Drilling to be done in an elephant migration corridor to carry out seismic survey. Further the article states concerns of environmentalist of the impact of seismic survey on the elephant community.	Are these cross-border elephant migration corridors and how are these factors relevant to the cross-border

	"…Mwiya's previous environmental impact assessment, for ReconAfrica's test drilling, noted that it would be done in an elephant migration corridor between two national parks, which is also where the company plans to carry out its seismic survey. (Coincidentally, on December 2, 2020, Namibia announced that it would hold an auction to sell 90 elephants that live in the vicinity of ReconAfrica's test wells.)	stakeholder engagements. How are the national parks protected from seismic drilling effects?

Question 10 EIA report, RBS Non Technical Summary, Background 1:	excerpt: Reconnaissance Energy Namibia (Pty) Ltd is the operator of the license situated in the Kavango Basin which is the eastern extension of the greater Etosha Basin in northern Namibia and the greater Kalahari Basin of Southern Africa. PEL 73 cover parts of the Kavango West and Kavango East Regions of northern Namibia.	Is the relevance Greater Etosha Basin explored in terms of aquifers and underground waterways. In case there is a link, how are the conservancies and communal land near and in Etosha Basin involved in the stakeholder process as directly impacted communities. See image below.
Question 11 EIA report, RBS **4.6.2 Summary of the Impact and Risk Assessment on Water** In the context of the impact assessment of the risk posed by the proposed oil and gas exploration drilling in the study area, it is concluded that most of the risk categories are moderate to negligible if proposed measures are adhered to. However, the risks associated with aquifer pollution vulnerability, impacts due to	Continued: to tank bursts or/and pipe breaks and that associated with impacts due to backwash water have high to moderate impacts with regard to water resources negative impacts in the study area. It is therefore recommended that the proposed mitigation measures be considered as integral part of the	**Questions** On the vulnerability of (leaky) aquifers: 11.1 How are the vulnerabilities of waterways connected underground researched and considered. 11.2 Who establishes EMP 11.3 Which independent experts oversee EMP 11.4 which ministry receives the reports 11.5 How does ReconAfrica and partners assure industrial commitment to ecological impact. (payment, insurance, compensation for spillage of any kind)

contaminated water discharge, impacts due Final EIA Report Vol. 2 of 3 - 58 - PEL No. 70 Blocks 1719, 1720, 1721, 1819, 1820 and 1821 Continued next column	environmental management plan (EMP).	11.6 Are financial deposits placed to the relevant Ministry in advance to ensure clean-up is financed. 11.7 Which insurance company is involved and do they have a track record of paying. Shell had to be ordered by Dutch court to pay for clean-up in Nigeria. 11.8 What is the standard practice of above and verification been shared with international scientists? 11.9 Which Public stakeholder meetings have occurred on this topic and where can one review the minutes and protocols? (4.8.1)



Question 12 EIA report, RBS Public notices were published in the Confidente Weekly Newspaper dated 16th – 22nd May 2019 and Namibian Daily Newspaper	Statement by Mr Max Muyemburuko from community concession states that Community-based organizations and communities were not consulted. 'We are in the dark regarding the impact of	Have similar stakeholder meeting been held in Angola, Botswana, Namibia, Zambia and Zimbabwe, pending on scope and reach of the project?

dated Tuesday 21st May 2019 (Figs. 5.10 and 5.11 and Annex 6). A feature article was also published in the Namibian Sun dated Monday 27th May 2019 (Figs. 5.12 and 5.13) in order to complement the two (2) notices. The feature article was based on information provided to the Journalist. The closing date for submission of written inputs /comments /objection is Friday 31st May 2019.	this project and the plans and activities and how these will impact our livelihoods' Namibian 24.11.2020	Who consults SADC neighbouring countries?
	Impact on Unesco World Heritage Site, Tsodilo hills, was only brought under the attention of the UNESCO by the public in late 2020, not via stakeholder meetings	How are the international agreements of SADC member states and Namibia in particular recognized in the considerations of the current EIA and next EIA?
	UNESCO steps in to protect heritage sties from oil exploration In conclusion of the message by Dr Mechthild Roessler, Director of Unesco World heritage centre, she explains that the state of conservation of the Okavango Delta will be examined by the World heritage committee at its next session in 2021	We can deduct that despite all the efforts and tracking of stakeholder engagements listed in the EIA of officials in Kavango West and Kavango East, mostly, the stakeholder engagements are not conclusive.
Question 13 Rainforest-Rescue.org petition	This petition gained 112.679 signatures (28th Jan 2021 status). The globally community in times of global warming, movement towards renewable energy investment and preservation of national habitats, reacted to the the proposed plans	This mirrors international concerns about the project and its impact at the Kavango Delta. This petition needs to be recognized as stakeholder engagement of the public.
Point 13 27 Nov 2020 Tweet by Minister Calle Schlettwein	Ministry of Agriculture, Water and Land Reform has not been consulted	-How is this ministry involved in the stake holder engagement
Point 14 Alarm as exploratory drilling for oil begins in northern Namibia (mongabay.com) 28.12.2020	Northern Namibia and Botswana have a number of interconnected watersheds including the Okavango Delta – the potential for pollutants to enter watercourses and spread throughout the region are a particular concern.	Additional article summarizing concern of the impact of spillage during project plans and future plans.
Question 15 **Exploration License 001/2020** Republic of Botswana and ReconAfrica	Republic of Botswana and ReconAfrica Amend Exploration License to exclude entire Tsodilo Hills Area ` Exploration licence 001/2020	Exclusion only after direct intervention from UNESCO. The World Heritage Site was not recognized in the Environmental Impact Assessment. Respectfully, this needs clarification on the comprehensiveness of cross-border stakeholder and recognition of the role of the SAN community

amend Exploration License to Exclude Entire Tsodilo Hills Area | 2021-01-05 | Press Releases | Stockhouse		specifically. The marginalized SAN community should be recognized as one of the most important stakeholder engagement parties of the complete process. Please also see in the source attached the details paragraph on cautionary statements for investors.

Namibia Nature Foundation

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21 January 2021

Dear Sir,

As an affected and interested party, on behalf of my organisation I would like to raise a few points with regards to the proposed 2D Seismic Survey Operation over the exploration Areas of Interest (AOI) within PEL 73 situated in Kavango West and East Regions.

1. As an organisation working and providing support in the Kavango East and Kavango West Regions, NNF appreciates the opportunity, however the short notice is inadequate for such a long and technically detailed document. The document requires more consultation and engagements as it has numerous technical details not easily comprehended without full explanations. Thus, the short notice provided makes it even more difficult to go through the document and ask the appropriate questions.
2. Under the current COVID-19 regulations it will not be feasible to have interactive meetings due to the limitations in numbers as well as the time limits.
3. Some of the figures (maps) do not have a clear key explaining what the different types of survey lines mean (different colours, some solid lines, some dotted) – for example Figure 1.6 on page 12
    - In some such figures, some Community Forests are indicated without names, while Conservancies do not appear at all (one apparent survey line runs along George Mukoya Conservancy)
    - Consultations with local communities along survey lines will be difficult during COVID restrictions yet will be necessary for instance to avoid innocent tampering with geophones due to ignorance.

I trust that you will find these concerns to be useful as you continue to engage with other parties on proposed 2D Seismic Survey Operation over the exploration Areas of Interest (AOI) within PEL 73 situated in Kavango West and East Regions.

Yours in Conservation
Allen Jiji
Regional Coordinator
Kavango East and Kavango West (0814249579)

Board of Trustees: Mr M. Böttger, Dr S. Heita, Mr M. Hill, Dr P. Lindeque (Vice Chair), Mr A. G. Middleton (Director), Dr R. Miller (Chair), Mr K. Uiseb

Namibian Association of CBNRM Support Organisations

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20 January 2021

Dear Sir/ Madam

RE: Request for registration for the meeting in Windhoek

My name is Maxi Louis, I am the Director of Namibia Association of Community-Based-Natural Resources Support Organisations (NACSO), and I am writing this letter to request for my name and that of my colleagues to be registered on the list of people who want to participate for the meeting that will be held in Windhoek. Below is the list of names that need to be registered for the meeting in Windhoek and Kavango East and West regions;

Names to be registered for the meeting in Windhoek;

Name and Surname	Institution	Contact Details	Place of attendance
Maxi Louis	NACSO	081 322 6303	Windhoek
Sigrid Nyambe	NACSO	081 658 8629	Windhoek
Mighty Ugwanga	NACSO	081 753 4016	Windhoek

Names to be registered for the meeting in Kavango East and West Regions;

Name and Surname	Institution	Contact Details	Place
Alfred Cheddau	IRDNC facilitator of Kyaramacan Association	0813319810	Kavango East
Margret Kamba	IRDNC; Women's Empowerment Project		Kavango East
Thaddeus Cheddau	Senior Khwe Council Member	0818984088	Kavango East
Teddy Mushavanga	Senior Khwe Council Member	**0818065661**	Kavango East
Kudumo Stephanus	Ambrosius Haingura Forestry	081 255 1363	Kavango West
Mutonga Thomas	Kapinga Kamwali	081 625 3029	Kavango East
Max Muyemburuko;	Muduva Myangana	081 288 5354	Kavango East
Kanyetu Joseph;	Ncaute Community Forestry	081 443 6581	Kavango West

Yours sincerely,

Director of NACSO (Maxi Louis)

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Some Comments on Proposed 2D Seismic Survey in Kavango West and East

Namibia Nature Foundation

The Namibia Nature Foundation among many other environmental projects throughout Namibia, has supported a number of community projects, largely through Community Forests and Conservancies in the 2 Kavango Regions for many years. Some of the comments below come especially from that perspective.

1.2.1 "a minimum of 2 wells"

A. What indicators or criteria might lead to more than 2 wells being drilled?

B. What indicators or criteria might lead to no seismic survey? [5.3.2 (vi) – No-Action Alternative]

1.3.2 2D Seismic Survey Influences on Local Communities

A How are the communities along the survey lines going to be consulted? [in order to avoid fear of strange activities; and to avoid innocent or ignorant tampering of the geophones]

B Community Forests and Conservancies are organized community institutions established by government with an interest and mandate in the environment and should be formally consulted.

1.4.4 Location of Proposed 2D Seismic Survey Lines

A None of the Figures label Conservancies – though some constituencies and some Community Forests are indicated. (Figure 1.5 & 1.6 seem to indicate seismic survey lines along George Mukoya Conservancy for instance)

B The legend on some figures is incomplete – what are the differences between solid lines and dotted lines, and lines of different colours (for instance Figures 1.4 – 1.7)

C The list of regional and traditional authorities along the proposed survey lines should be expanded to include Community Forests and Conservancies which are organized community institutions established by government with an interest and mandate in the environment and should be formally consulted

2.3.3.1 Proposed Survey Design and Layout

A The legend is incomplete [see 1.4.4 A & B above]

2.3.3.2 Proposed Seismic 2D Ground Survey Implementation Stages

A. There must be adequate consultation with local communities along the survey lines [see 1.3.2 A & B; and 1.4.4 C above]

2.4.2 Fly Camp Site

[See 2.3.3.2 A above]

2.4.3 Lines Widening, / Clearing

A Again consultation will be necessary and helpful, and where there are Community Forests and Conservancies, they offer organized community institutions established by government with an interest and mandate in the environment.

B Given that the equipment appears to have been specified, should there not be a more accurate description of the minimum and maximum width for line widening and clearing?

4.3.2.3 Mammals

A Neither the potential impact of the movement of elephant herds on the implementation activities, nor the potential impact of the survey (e.g., shock waves) appear to have been considered

4.7.2 Stakeholders Consultation Process to be Undertaken

A Consultations should be conducted in Windhoek as well, as some expertise and interest exists there, yet COVID restrictions make travel to the Kavango Regions difficult for a 2 hour meeting.

B While initial consultations need to be conducted as part of the EIA, if and when actual implementation is to be conducted along confirmed survey lines (especially if alternative lines are to be used), then timely consultations need to be conducted along those survey lines for reasons stated above.

5.3.2 Proposed project Alternatives & Ecosystems Assessments

(ii) Are the 'alternative' survey lines clearly identified in the legends of the Figures?

5.4.2.2 Fauna and Flora Receptors

A Elephants (3rd paragraph) – "the weight-drop …..is not expected to have any frequency specific interference with the natural receiving environment" – based on what research, experience. General reference is made to Kavango West in 2018 – yet not specifically to elephants, and there are more elephants in Kavango East near the Khaudom N.P.

5.4.3.1 List of Potential Stakeholders

A The list of stakeholders should be expanded to include Community Forests and Conservancies which are organized community institutions established by government with an interest and mandate in the environment.

5.4.2.5 Socioeconomic Components

A Again consultation will be necessary and helpful, and where there are Community Forests and Conservancies, they offer organized community institutions established by government with an interest and mandate in the environment.

SUBMISSION BY THE ANGLICAN DIOCESE OF NAMIBIA

FROM

RT REVD LUKE LUNGILE PATO

(BISHOP OF NAMIBIA)

&

REV MICHAEL YATES

PUBLIC INVITATION FOR THE NAMIBIAN PUBLIC TO SUBMIT WRITTEN SUBMISSIONS ON THE PROPOSED APPLICATION BY CANADIAN COMPANY

ReconAFRICA

FOR AN

ENVIRONMENTAL CLEARANCE CERTIFICATE AND PETROLEUM EXPLORATION LICENCE (PEL 73)

FOR

A SEISMIC SURVEY COVERING THE AREA OF INTEREST

GENERAL COMMENTS

I would like to thank the Namibian Government and Risk-Based Solutions for the opportunity to respond to the newspaper notice of Friday 15th January 2021 inviting interested and effected parties to submit their comments and concerns.

General Comments:

1. It would now appear that the GRN and its State-Owned-Enterprise NAMCOR, have been in discussions with ReconAFRICA for quite some time, and have either by oversight or by choice, deliberately kept the Namibian public in the dark on these discussions.
2. It is widely recognized that unless the whole world moves away from fossil fuels and into what is called Renewable Energy, our planet is doomed. Namibia, (probably more than any other country on earth) has plenty of renewable energy in the form of sunlight, so why not do the right thing now for future generations and develop this solar energy? Fossil fuels should remain in the ground.
3. The potential environmental damage of petroleum extraction to Kavango East and Kavango West, not to mention any encroachment into the Okavango Delta Basin itself, is likely to be irreversible and permanent. This will not be just a tragedy for the communities who have lived there for many centuries, but also a tragedy for the ecosystems of the delta area which boasts unique fauna and flora. If we are doubtful about the environmental safety of the environment, why is the GRN allowing petroleum exploration at all?
4. We call on Government to insist that ReconAfrica holds virtual public meetings in Windhoek, on the proposed 2D seismic surveys, and on the wider implications of potential petroleum drilling and extraction in the Kavango Regions.

Some important questions to Sindila's company

- To what extent were local communities in the immediate 2D Seismic survey and drilling areas consulted, or were the discussions only with the Headmen and senior political leaders? We would like to see the records of what various people were told about the project and what the individual community members said about the risks and rewards.

Some important comments and questions to Government

- There is a concern being discussed by the Namibian public that ReconAFRICA, as a junior oil and gas company engaged in the exploration and development of oil and gas, does not have a proven track record to undertake the 2D Seismic survey, and future drilling and petroleum extraction.
- There are further rumours that ReconAFRICA may have taken money from vulnerable Canadians, to pursue this project in Namibia, as their website in 2020 was boosting "The exploration licence covers an area of approximately 25,341.33 sq km (6.3 million acres), and based on commercial success, it entitles ReconAFRICA to obtain a 25 year production licence".
- If this petroleum extraction scheme goes ahead, who will be held accountable for any damage to our Namibian environment?
- What guarantees will the GRN make to protect the potential removal of numerous rural families who can no longer stay on the land because of dangerous pollution and the destruction of their communal lands?
- If this petroleum venture turns out to be a human disaster and leads to the destruction of a world heritage ecology site, the Namibian Government and those senior officials in positions of influence who actively promoted this scheme and authorized it, should be held accountable under the law.
- We remain deeply opposed to this questionable scheme that our government is now apparently pursuing.
- We call on our government to look to a better future for Namibians, a future away from fossil fuels to clean, renewable, cost efficient energy. Solar panels and the energy they generate can be locally produced, bringing income and livelihood opportunities to our rural poor.

Let us together take hands and do what is best for the future of this Land of the Brave and the home of the Free.

+ Luke Pato
LUKE LUNGILE PATO
ANGLICAN BISHOP OF NAMIBIA

T. M. Yates

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28 January 2021

Stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73
Shale development project of ReconAfrica in Kavango Basin

Dear Dr. Sindila Mwiya,

as a confirmed and registered stakeholder, I herewith contribute to the submission process in relation to the proposed 2D Seismic Survey Operation in PEL 73 as follows:

1. **Seismic survey represents first stage for field development – cumulative impacts need to be taken into account**

As you know, seismic surveys represent the first stage of a field development – in this case the Kavango basin where ReconAfrica wants to predominantly exploit shale oil and/or gas. The company was founded by Craig Steinke, who – despite being the owner of shale licenses in France[i], Poland, Germany[ii] and Spain[iii] – wasn't able to develop shale and/or start fracking operations in Europe.

Exploratory drilling is already underway and the current proposed seismic surveys shall pave the way for more explorational drillings. Seismic surveys are therefore an inseparable part of the exploration phase that will end up in at least one hydraulic fracturing or fracking operation.

Fracking is a crucial part of the exploration phase of oil and gas extraction. The so-called "stimulation drilling" allows a company to ascertain if there is enough economically viable oil or gas in the underground. Once companies make that positive determination, full scale fracking will inevitably ensue. Individual applications must therefore be viewed and assessed as part of a larger plan by the companies to develop an extraction industry more broadly in the targeted regions – in this case a rural, non-industrialized arid area.

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The cumulative impacts must therefore be taken into account from the beginning of the proposed development (including seismic surveys and exploratory wells).

2. **Intended shale oil development and fracking clearly on the table**

In your draft scoping report you write that "*it is during the EIA for appraisal drilling for commercially discovered oil or gas and for possible production … that one can now start to talk about fracking. … Fracking is not an exploration drilling technique but an oil or gas production method applied after a commercial proved discovery in a reservoir with poor primary permeability*."

According to the 2013/2014 study published by the German Federal Environment Agency[iv]

*"**Project-related impacts in connection with exploration** and exploitation **of unconventional natural gas deposits (intervention)** depend primarily on the techniques and equipment used, which can vary from site to site. The **key aspects in this regard include**:*

•Drilling techniques and well completion,
•Techniques for stimulation of the deposit (fracking), along with the substances used in the process,
•Disposal (flowback), gas extraction and water drainage.

*The **key characteristics of exploration** and exploitation **of unconventional natural gas deposits include use of the following two technologies (cf. Tab. 1):***

•Horizontal drilling
•Hydraulic fracturing (fracking)"

Even if fracking wouldn't be clearly on the table for the exploration phase it is undeniable that the company will have to frack during the envisaged production phase of at least 25 years.

ReconAfrica has constantly and repeatedly highlighted the fact that they're after the shale play. Any so-called conventional resources will be merely a by-catch. This is also clearly outlined by the presentation given by the founder of ReconAfrica, Craig Steinke, in May 2020[v] and by the fact that the company has hired – amongst other shale experts – the "father of modern-day fracking", ie Nick Steinsberger.[vi]

Recon also confirms the need for fracking operations in the July 2020 report where the company also compares the Kavango Basin with the Karoo/Permian Whitehill Basin in South Africa.[vii] What's really worrying, is that Recon is very confident to get access to water over the envisaged production period of at least 25 years – although they are clearly operating in a very arid area:

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"*Of **tremendous concern in South Africa is water, a significant requirement for unconventional plays requiring fracture stimulation**. Shell is looking at conservation, recycling, and brackish water as to not compete with locals for fresh water resources. **ReconAfrica's situation is significantly better in that surface rights and access are held by the government, and abundant ground water supplies should be a source of building, not breaking, relationships with the local population**. (page 17)*"

3. **Fracking impacts**

More than a decade of large-scale use of fracking to extract fossil fuels from the ground has shown how harmful and destructive this extraction process can be, as confirmed and acknowledged by countless peer-reviewed scientific studies. There are numerous proven risks and impacts related to the development of fracking projects, such as industrialization of former rural areas, heavy freshwater consumption, water and soil contamination, public health impacts and the significant contribution to global warming.[viii]

In June 2019, the Human Rights Council published a report on climate change and poverty, clearly highlighting the fact that "*fossil fuel companies are the main driver of climate change*" and that "*the track record of the fossil fuel industry makes clear that overreliance on profit-driven actors would almost guarantee massive human rights violations*".[ix]

I urge you therefore to take this foreseeable development serious and to address the future unfolding cumulative impacts of shale development in the Kavango basin.

It makes no sense to allow seismic surveys and explorational drillings to go ahead – knowing where this will lead if the company finds recoverable shale hydrocarbons.

4. **Strategic Environmental Assessment and Moratorium on current Exploration Phase**

To truly assess the cumulative impacts of ReconAfrica's plans in the Kavango basin, a transboundary Strategic Environmental Assessment is required and should be conducted.

The Namibian Ministry of Health and Social Services recently signed an agreement with Vienna based International Atomic Energy Agency to assess how climate change is impacting Namibia's groundwater resources.[x] A moratorium on the further steps of the exploration phase (including seismic surveys) should be put in place until the results of the project called "*Assessing the impact of climate change and variability on groundwater resources in major aquifers in Namibia*" have been provided and can be properly assessed.

My best regards

Andy Gheorghiu

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[i] https://www.marketscreener.com/quote/stock/REALM-ENERGY-INTERNATIONA-7878990/news/Realm-Energy-International-Corp-Joint-Participation-with-ConocoPhillips-in-Paris-Basin-13710358/
[ii] https://www.ogj.com/home/article/17267187/realm-energy-builds-european-shale-acreage
[iii] https://www.rigzone.com/news/oil_gas/a/111077/realm_energy_acquires_shale_play_in_spain/
[iv] https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/texte_83_2013_environmental_impacts_of_fracking.pdf
[v] Reconnaissance Africa Zoom Presentation with co-founder Craig Steinke - May 27, 2020
Available at: https://www.youtube.com/watch?v=cGbnB-aEsu0
[vi] https://oilprice.com/Interviews/The-Worlds-Last-Great-Oilfield-An-Interview-With-Nick-Steinsberger.html
[vii] https://reconafrica.com/wp-content/uploads/ReconAfrica-Research-Report-July-2020.pdf
[viii] Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking (Unconventional Gas and Oil Extraction).
Available at: http://concernedhealthny.org/. Sixth edition (December 2020): https://concernedhealthny.org/
[ix] UN Human Rights Council. „Climate Change and Poverty: Report of the Special Rapporteur on extreme poverty and human rights“. 25 June 2019.
Available at: https://srpovertyorg.files.wordpress.com/2019/06/unsr-poverty-climate-change-a_hrc_41_39.pdf
[x] https://www.namibian.com.na/98236/read/Climate-change-and-Namibias-aquifers

Comments and objections to Risk Based Solution's Draft Scoping Report for 2D Seismic Survey in PEL 73 by ReconAfrica, Kavango, Namibia

Introduction

I am a PhD student in wildlife sciences at the University of Goettingen in Germany. I hold a Bachelor of Science degree in Biodiversity and Ecology and a Master of Science degree in Engineering in Ecology and Biodiversity Management. I furthermore hold degrees of certified project management courses and have volunteered in the field of sustainable development since 2010. I have been working in several tropical countries in field studies on animal behaviour and ecology, among them Madagascar, Brazil, Tanzania, and last year for a full 11 months in Botswana.

Climate Change

In section *1.3.3 Current Project Motivation* is a statement that oil and gas fields can help Namibia to transform to a greener economy in the next 20-30 years. I object that a country cannot turn into a greener economy when it uses fossil fuels to get there. If already reducing carbon emissions is not enough to limit the global temperature rise, producing even more will in any case worsen the carbon balance of the country and cannot help to make it "greener". Fossil fuels, which include economic hydrocarbon, have to be left in the ground (https://www.newscientist.com/article/dn24299-ipcc-digested-just-leave-the-fossil-fuels-underground/). Therefore, even if the survey itself would have minor environmental impact, it is nothing but a preparation for activities that will have major – and global – environmental impacts and that are to be avoided. A survey for hydrocarbon extraction is an unnecessary disturbance and does not provide any long-term benefits for the country. The possible, and likely negative impacts of hydrocarbon extractions in the area are highlighted elsewhere (https://www.petro-online.com/news/safety/15/breaking-news/why-is-oil-exploration-controversial-in-namibia/54278?fbclid=IwAR1uxhagBQGXDMM0yVbBwgLZGkpG701KGAEvOVBOI-TNLorsnOOFRMmItEs).

Stakeholder participation

It came to my knowledge that participants of the local communities in the stakeholder meetings were not given the time to express their concerns about the seismic survey. In this case, the consultation process would not have taken place in a sufficient manner and would have to be repeated. I would therefore like to be provided with a detailed timeline of the meetings from 23rd to 25th January and the actual time that members of the local communities spoke.

Fauna

In section *4.3.2.3 Mammals* are some of the mammal species in the area mentioned. However, there is no information about how they are affected. It would be necessary to take their daily and yearly behaviour into account. Many of the mentioned species have large home ranges and migrate between the National Parks and Community Conservancies in the affected area. Simply stating their occurrence does not inform about the impact that the proposed operations might have on the populations. Furthermore, although it is mentioned that part of the survey area falls into the Kavango Zambezi Transfrontier Conservation Area, the aims and regulations for this conservation area are not provided. Is a seismic survey compatible with the long-term overall goals of the transfrontier conservation area?

Sustainable development and Namibia's contribution to the 17 UN sustainable development goals

In section *5.3.2 Proposed Project Alternatives and Ecosystem Assessments* is the "No Action Alternative" mentioned. It is stated that negative environmental impacts are still likely to take place even in the absence of the proposed petroleum explorations. While this might be true, there are no alternatives of better projects provided. Instead of a seismic survey, a survey for solar energy, wind or the effects of reforestation and improvements of the wetlands in the area could be undertaken. These are likely to have much more advantages and long-term benefits than risky oil extractions. Yes, development might be poor in the area and the people likely do seek employment. However, this does not have to take place with compromising the region's and the world's future. A good example is the developing Carpathia Wilderness Reserve Project in Romania (https://www.carpathia.org/conservation-enterprise/) or the community empowerment by Africa GreenTec (http://www.africagreentec.com/). I object that a long-term environmental impact assessment including worst-case-scenarios has to be provided, where the consequences of a completion of the seismic survey, ongoing oil extractions, ground water pollution, oil spill into the adjoining rivers, air pollution and health effects for the local communities are explained. The costs including environmental costs of these worst cases should be outlined. Additionally, examples of sustainable, environmentally friendly projects that could also be undertaken in the area and their possible benefits should be presented. Local communities should be given options of possible developments instead of no development or risky, health and livelihood-compromising development. The long-term costs of worst-case scenarios of the sustainable projects may be compared with the long-term costs of worse-case scenarios of the seismic survey, but one should not compare the worst case of the one with the best case of the other.

The decision for the Environmental Clearance Certificate for the seismic survey is not only the decision to allow a seismic survey. It is a decision point on whether Namibia wants to invest in fossil fuels, allow land grabbing, and undermine traditional land use, or whether it wants to take a stand for sustainable development. The goals of sustainable development are to minimise the depletion of natural resources when creating new developments and to create a development that can be maintained without causing further harm to the environment. Both would not be given when the aims of the seismic survey, oil extractions, would be carried out. Therefore, the seismic survey in itself is a threat to the sustainable development in the area and a severe disturbance of the environment that would have only very short-term (four months) benefits in form of jobs for the local communities. This would also be in contradiction to the 17 UN goals of sustainable development until 2030.

Conclusion

In the current climate- and biodiversity crisis, a seismic survey with prospect to oil drilling is a step in the wrong direction. All permits and licenses for petroleum exploration in the Kavango area should be withdrawn. Instead, already available sustainable land uses should be supported and surveys for further sustainable investment and climate mitigation be undertaken.

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Oil and Gas drilling in Kavango: the case for a Strategic Environmental Assessment.

02-02-2021

Background

Reconnaissance Energy Africa Ltd has commenced drilling operations on the first well (6-2), of an initial three well program, in the deep Kavango Basin in the Kalahari Desert of North East Namibia. This follows the preparation of an environmental impact assessment (EIA) that was extremely limited in scope and where, by the company's admission, the follow-up consultation process was flawed and failed to reach key stakeholders including local communities. Subsequently, the company has commissioned another EIA for the 2D seismic testing in the basin which will lead to identification of further drilling sites.

The case

The company is taking the approach that decisions on further test drilling would only be taken on the basis of the seismic testing, and decisions on the extent and method of extraction would only be taken on the basis of test drilling. Based on this approach it will only assess environmental impacts in a stepwise fashion.

However, given the potential scale of the operation, the size of the Kavango basin, its complex hydrology, and the worst-case scenario for long-term impacts if, for example if hydraulic fracturing (fracking) is employed, this stepwise approach to assessment of the impacts is not satisfactory and does not comply with best practice. Major economic and political difficulties could ensue if, for example, it is discovered late in the process - when considerable resources and political capital have already been committed - that there are potentially serious risks to biodiversity, water security quality and the welfare of local rural communities.

It is submitted, therefore, that the interests of conservation, of local communities, of the relations between Namibia and its neighbours and of the company will be best served by conducting a strategic environmental assessment (SEA), carried out according to international standards and subject to independent review. Such a SEA would provide much more certainty on the following points of concern:

- Worst-case environmental impact in the event of a full-scale extractive operation;
- Exploration of the sensitivity of the area, considering potential impacts in a fully holistic way, and over time
- Implications for local rural communities;
- Implications for water security in the region, with particular regard to downstream neighbouring countries, such as Botswana;
- Potential constraints for the company, such as no-go zones and restrictions on certain drilling and extraction methods.
- Mitigation and management options for potential impacts of the proposed exploration/mining activities

A comprehensive SEA, in place of piecemeal EIA's over time, will avoid the situation where the Namibian government gets progressively drawn into a situation that will be increasingly difficult to reverse should extreme adverse impacts emerge in time. In addition, such a SEA should outline the appropriate rehabilitation measures that would be required should drilling proceed, with the estimated costs, which would become an integral part of any environmental clearance issued by MEFT. The need for a SEA was further raised at the Public Participation meeting for the 2D Seismic Survey that was held at Hotel Thule in Windhoek on the 2nd of February 2021. At that meeting the consultant representing Recon Africa indicated that Recon would consider the development of the SEA for the area in question.

Given the transboundary nature of ecological processes in the region, and the fact that Recon Africa has plans for exploration in both Namibia and Botswana, the SEA should be of transboundary nature, covering the entire basin between the two countries.

There is already a precedent for the SEA in similar circumstances, as one was carried out for the Uranium Province in the Central Namib which resulted in the Strategic Management Plan (SEMP) which outlined mitigation measures and led to the formation of a multidisciplinary coordination committee overseeing the implementation of the SEMP.

Therefore, WWF thus urges the Namibian government not to approve any more piecemeal EIA's or the commencement of any further operational activities relating to exploration in the Kavango Basin until such a holistic SEA has been conducted, and the full set of exploration implications assessed.

Annex 3-8 - Issues and Response Record_EIA Scoping_2D Seismic Activities PEL 73_Kavango East and West Region

March 2021

PUBLIC, REGISTERED STAKEHOLDER AND COMMUNITY ISSUES AND RESPONSE RECORD

Based on Public, Registered Stakeholder and Community Meetings Undertaken from January – March 2021 and Submissions by Stakeholders with respect to the Draft Scoping Report Public Advertisements for the Proposed 2D Seismic Survey over the Area of Interest in PEL 73, Kavango West and East Regions, Northern Namibia

March 2021

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
1.	**Petroleum Exploration (2D Seismic and Stratigraphic Well Drilling) and the associated Environmental and Social Impacts**			
1.1	**Environmental Aspects**			
1.1.1	We must substantiate social corporate responsibility especially when dealing with foreign investors, as the custodian of environmental matters in this country, our interests are not just to uplift or enhance social economic welfare we also look at the likely repercussions associated with exploration activities on the environment including such as fauna and flora. Specific attention to petroleum is the void it can create through the extraction process and global contribution to CO2 emissions. We will not only focus on localized impacts but look at a global scale also.	🗣 = Stakeholders Engagement Meeting with the Ministry of Environment Forestry and Tourism (MEFT), 18 January 2021.	A response was given such that ReconAfrica will ensure compliance to all the local regulations. Conducting this stakeholder engagement is complying to the EIA regulations. The EIA process takes accountability of all aspects associated with each activity proposed to be implemented. The proposed Oil and Gas Exploration project is being implemented into phases; each phase requires an EIA process undertaken. An EIA process for the ongoing stratigraphic well drilling operation has already been done and an ECC from MEFT has been issued. We are now focused on the proposed 2D Seismic Survey activities and not oil production activity. We are on a journey to that discovery and at this stage we so far away to that destination. We are just at the initial stage. In addition to the EIA process, the petroleum agreement specifications on environmental compliance is so detailed than the EIA regulations can provide. Every stage in the petroleum exploration process requires various commitments to both environment and social aspects.	EIA Chapters 5 (Receiving Environment) and 6 (Impact Assessment) EMP Chapter 3 (Specific Mitigation Measures)
1.1.2	A question was raised such that shall the proposed 2D Seismic Survey and more stratigraphic drilling operations result in feasible economic oil and gas discovery in both Kavango West and East Region, is ReconAfrica going to choose one specific area for production, or is the production going to be logged in both regions?	🗣 = Community Consultation Meeting at Sivaradi, Kavango West Region, 23 January 2021	A response was given such that, wherever the discovery is feasible, is where the production will be undertaken. However, as the both Governors of Kavango West and East Regions stated, the project in its entirety will benefit both regions in terms of socio-economic development.	EIA Report Chapter 6 Subsection 6.4.2.1
1.1.3	We acknowledge Dr. Mwiya for a good illustrative presentation. However, can you discuss some of the negative impacts associated with the Seismic activities?	🗣 = Community Consultation Meeting at **Mutwegombahe** and **Mbambi** community, Kavango East Region, 8 February 2021 and	The EIA process allows us to assess every detail of activity and determine its significant impacts on the environment. Where an impact is significant, management and mitigation measures are proposed. Specific to the on-going stratigraphic well drilling operation an Environmental Impact Assessment process was already undertaken, the potential impacts associated with that activity are not significant. A small portion of already disturbed land was cleared for construction of a temporary site. The	For 2D seismic please refer to EIA Chapters 5 (Receiving Environment) and 6 (Impact Assessment)

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			drilling process is engineered in such a way that casing and cementing is used throughout the drilled hole to avoid any potential water pollution between aquifers. The Blow Out Preventer is engineered and designed to prevent eventual blow out from pressure built up in the drilled hole. The entire process is managed and mitigated through an existing EMP. The 2D seismic Survey will not have any significant impacts either unless the survey activities divert from the proposed already existing access roads this would mean we would have to cut new lines and some vegetation will be removed in the process.	EMP Chapter 3 (Specific Mitigation Measures) For stratigraphic well drilling, refers to the previous EIA and EMP Reports
1.1.4	What is the long-term environmental impact that could result from the seismic operation in 5 to 10 years from now.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	Taking into consideration this is an EIA process at the Scoping phase and understanding the background to the seismic survey activities and proposed location within existing infrastructure, there is no long-term environmental impacts associated with the proposed 2D Seismic survey.	EIA Chapters 5 (Receiving Environment) and 6 (Impact Assessment) EMP Chapter 3 (Specific Mitigation Measures)
1.1.5	The honorable Governor requested Mr. Isaack Viejo in attendance to give his personal experience on a 2D Seismic Survey Project he was once involved in a few years ago. Mr. Veijo emphasized the Seismic survey process previously undertaken is a very simplistic methods that only involves a Vibroseis Track as energy source and a team of local residents plotting wireless recording instruments and removing them. No relocations of communities, or damage to building facilities or any impacts on the environment were experienced.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	Comments / inputs	
1.2	**Social Aspects (Socio Economic Benefits from 2D Seismic and Stratigraphic Well Drilling)**			
1.2.1	The headmen emphasized that, she expects the community to raise questions related to how Sivaradi community could directly benefit from the proposed 2D Seismic survey and shall the discovery of oil be feasible for production how will this still benefit Sivaradi community?	🗣 = Community Consultation Meeting at Sivaradi, Kavango West Region, 23 January 2021	Comments / inputs	
1.2.2	How will the local community especially Kawe and Mbambi benefit from the project apart from job creation opportunities?	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021	A response was given as follows:	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			• The petroleum industry is highly regulated when it comes to local benefits relating to employment creation and use of contractors "service providers". An MPA is signed between the applicant "Recon Africa" and the Namibian government represented by the MME. • Provisions regarding preference to local recruitment of highly technical skills and service providers are part of the MPA. • Training provisions is also clearly stated in the MPA. • The petroleum act has separate regulations developed to supplement the income tax and Value Added Tax. Shall oil and gas be discovered, 5% royalties and 35% corporate tax agreements will be entered into. • License annual fees are charged per degree square block, mandatory annual contributions of up to 1.2 Millan NAD is also contributed toward the Petroleum Training and Education Fund (PetroFund). Noncompliance to these requirements and conditions would lead to sanctions that can lead to penalties and or revoking the MPA.	EIA Report Chapter 6 Subsection 6.4.2.1
1.2.3	A comment was raised such that ReconAfrica should look into other potential alternatives that could benefit the communities and could empower **women** in these areas.	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021		EIA Report Chapter 6 Subsection 6.4.2.1
1.2.4	How many local people do you intend to employ from Cuma for the seismic operation?	🗣 = Public Consultation Meeting at AMTA, (Afternoon session), Rundu 22 January 2021	This will depend on the type of job skills required for the specific task. The Traditional Authority will also be involved with the process.	
1.2.5	We understand ReconAfrica has invested a lot of money in the Oil and Gas Exploration programme, suppose nothing is found, do they park their equipment, leave and claim their investment back from the Namibian government?	🗣 = Community Consultation Meeting at Sivaradi, Kavango West Region. 23 January 2021	A response was given such that, ReconAfrica will definitely cease the operation. However, the data gathered will still remain a national asset.	EIA Report Chapter 6 Subsection 6.4.2.1
1.2.6	Shall Oil and Gas be discovered in Kawe, what are the direct benefits to the community?	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	A response was given such that: This community consultation meeting is about the proposed 2D Seismic Survey activities. We do not know there is feasible amount of Oil and Gas at this stage. Shall Oil and Gas be discovered, another community consultation process will be undertaken based on an Environmental Impact Assessment process. At this stage of Exploration activities, there is clauses in the Petroleum Agreement between	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			Recon Africa and the Namibian government on community development. The opportunity to raise such concerns will be given at that time.	
1.2.7	The headmen acknowledged the interactive illustration presented and reminded everyone that such a project has been done in many countries around the world and the process presented is similar to that undertaken on an international standard. The headman further expressed that, it would be difficult to disregard such a project of national interest that could bring about economic development in the communities. However, he emphasized that the project should directly benefit communities in the Kavango Region. Shall the area of interest reach Cuma area and specific to the 2D Seismic Survey at this stage, we would like to request for ReconAfrica to directly employ the local community of Cuma in assisting with the operation. We do understand we will not get employment if the area of interest is in Mbambi, as that should benefit the Mbambi community.	🗣 = Community Consultation Meeting at Cuma, Kavango East Region. 8 February 2021	Comments / inputs	
1.2.8	It's clear that the community and land owners have surface rights and the state/ Government in terms of minerals exploration have subsurface rights. We also do understand that shall oil and gas be discovered below a land belonging to an individual person or community, production in terms of abstraction of the oil could be done elsewhere without infringing on the land owners' surface right. Will there at least be benefits for the owner of the land understanding the oil is below their grounds?	🗣 = Community Consultation Meeting at Cuma, Kavango East Region. 8 February 2021	A response was provided as follows: There will be an opportunity to discuss and negotiate benefits to not only the owners of the land but the entire community. The approach is similar to that of the mining industry and there are laws within the Traditional Authority and communal land rights that addresses this aspect. The Namibian government and ReconAfrica have entered into a petroleum agreement that also ensures not only the state benefits but also looks at direct community development opportunities. However, this will be entirely a different process and consultation will be undertaken at that stage when Oil and Gas has been discovered and feasible for economic purposes. The focus at this stage is data collection through the 2D Seismic survey and Stratigraphic Well drilling activities.	EIA Report Chapter 4. Legislative Framework
1.3	**Social Aspects (Employment and Recruitment process)**			
1.3.1	A question was raised such that when the seismic survey activities begin, is it only technically skilled people that will be employed to support the operation?	🗣 = Community Consultation Meeting at Gcaru, Kavango West Region. 24 January 2021	A response was given such that, shall the seismic survey be undertaken both local technical and non-technical skilled labor will be employed. Training will also be provided where required. The traditional authority and the Councilors will be requested to assist with identifying people from the communities that could support the survey activities in the area.	EIA Report Chapter 6 Subsection 6.4.2.1 and EMP Report Chapter 3 Specific Mitigations on
1.3.2	A comment was raised by an elderly as follows: "All these young men and women gathered here are looking for jobs. God that knows our suffering has sent us a Doctor "Dr. Mwiya" to enlighten us about this knowledge and opportunity so that our children will benefit through employment and be able to take care of their elders"	🗣 = Community Consultation Meeting at Gcaru, Kavango West Region. 24 January 2021		

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
1.3.3	A comment was raised as follows: We would like to urge for all communities including Traditional Authorities, the councilors to work together especially in understanding the recruitment process and how it will be implemented. This will avoid conflicts between the different communities.	🗣 = Community Consultation Meeting at Gcaru, Kavango West Region. 24 January 2021		Social Negative Impacts
1.3.4	A comment was raised as follows: We would like to thank you for a good presentation for detailing what the process ReconAfrica is undertaking at this stage. We wished that this information was available or presented earlier on as our communities have been misled whereby we identified the operation as an actual mining operation opposed to an Exploration drilling and proposed 2D Seismic Survey. However, we still wish for more clarity based on the employment recruitment process as we are still misled with information such that one has to offer cash as a sort of payment to be considered for work, please clarify on this.	🗣 = Community Consultation Meeting at Ncuncuni, Kavango West Region. 25 January 2021	A response was given that, this is indeed misleading information. The recruitment process for the proposed 2D seismic operation will be handled through the Traditional Authority, councilors and headmen.	
1.3.5	A comment was raised as follows: There has been earlier information communicated through newspapers relating to employment such that one would have to register their names for possible employment, there is still a lot of confusion in terms of what is the right channel to send resumes/ CVs. The earlier information required the public to register through submission of CVs online, by post and or at AMTA offices in Rundu. We are not sure whether such employment request has to do with ReconAfrica directly for the Stratigraphic well drilling operations or the contractor Cowboys. In this regard, is the contractor Cowboys related with the actual well drilling operation?	🗣 = Community Consultation Meeting at Ncaute, Kavango West Region. 26 January 2021	The headmen responded to this query as follows: The company cowboys are not appointed to undertake stratigraphic Well drilling activities. They are subcontracted to provide containers and catering services for the team working at the drill site. If cowboys advertised, it must have been for such related activities.	EIA Report Chapter 6 Subsection 6.4.2.1 and EMP Report Chapter 3 Specific Mitigations on Social Negative Impacts
1.3.6	Based on the presentation offered, it is very clear how the 2D Seismic activities will be undertaken and how the short-term recruitment process in each area where the seismic activities will be undertaken through the Traditional Authority and headmen. We do understand there is limited employment at this stage however shall the data collection process result in positive findings a totally different process will be implemented and perhaps assuming the production stage of Oil and Gas is regarded feasible, them more employment opportunities will be available.	🗣 = Community Consultation Meeting at Ncaute, Kavango West Region. 26 January 2021		
1.3.7	Prior to the existing stratigraphic well drilling operation. There were jobs promised to the community by the various contracting companies working on site presently and so far, there has not been any communication around the recruitment of people from the community for possible employment could you please clarify how this process has been implemented?	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	A response was given such that, It depends which contractor promised communities for jobs. ReconAfrica have appointed a main contractor that is a highly specialized technical skills service. The main contractor has also appointed subcontractors. The subcontractors must ensure community involvement in delivery of their services. Perhaps at the stage they communicated information. There are certain jobs that do not require specialized skills perhaps instead of advertising nationally for these and creating the perception it's a big operation needing a large number of people they should have involved the traditional authorities and headmen from the community. For the seismic survey the approach is different and will involve traditional authorities for short term recruitment in each community where the survey will be undertaken.	
1.3.8	There is more misleading information regarding the submission of resumes for work opportunity at AMTA (the designated office for Pioneers Energy and Minerals Consulting in Rundu) and the promises made possibly by the same contractor of job opportunities for our community. It seems we are all wasting our money since we don't have mailing/ post office infrastructure and making an effort to get transportation and travel to Rundu town for resume submissions. It seems preference will be for people in Rundu Urban while our community that is quite close to the drill rig will never have work opportunity. We would like clarity on who is responsible for such information.	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	ReconAfrica have contracted a recruitment company to appoint people for different services and jobs not only in Kavango but as far as Walvis Bay and Windhoek. Perhaps the public may have not read quite well what's been requested in the adverts placed in the newspapers and created an	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			impression that there is actually a lot of work opportunities being requested.	
1.3.9	A comment was raised such that, it seems for now the job opportunities for the immediate community is limited and perhaps only during the Oil and Gas production stage shall the project transpire to that.	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	A response was given as follows: The Oil and Gas production phase brings its own myriad of job opportunities interrelated to the project. Training will also be offered for many job skills. The focus at this stage is data collection through stratigraphic well drilling and 2D Seismic survey.	EIA Report Chapter 6 Subsection 6.4.2.1 and EMP Report Chapter 3 Specific Mitigations on Social Negative Impacts
1.3.9.1	We have observed that some of the subcontractors have brought their own non-technical skilled labor including cleaners, catering services, laundry service providers and security services. We do have people locally capable of delivering such services. It still seems the communities around the project area will not benefit much from this project this applies to the current project activities being undertaken.	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	A response was given as follows: This information will be relayed to the responsible party.	
1.3.9.2	There has been communication circulating regarding the submission of CVs for the stratigraphic well drilling operation at Kawe, we are assuming a lot of CVs has been received, has any of the people from the local communities employed? We have heard most contractors bring in their own team from out of the region and leaving no locals employed.	🗣 = Community Consultation Meeting at Cuma, Kavango East Region. 8 February 2021	A response was given such that, ReconAfrica has appointed a contractor that has appointed subcontractors to deliver different services from non-technical activities to specialized technical activities. The contractor including its subcontractors have requirements that needs to be fulfilled in terms of recruitment of localized services. There is local people working on site. We are at the very early stage of implementing the project, as the process carries on there will be other short-term employment opportunities that could also require recruitment of local people from Cuma to assist with the 2D seismic survey activities. This will be discussed with the Traditional Authority and the headmen.	
1.4	**Social Aspects (Training)**			
1.4.1	A question was raised such that, will training be offered to especially non-skilled labor where relevant, as some of us have no work experience related to seismic survey activities?	🗣 = Community Consultation Meeting at Ncuncuni, Kavango West Region. 25 January 2021	A response was given such that, Training will be offered for all labor activities. This is part of the Petroleum agreement between the client and the Namibian government.	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
2.	**The Kavango Sedimentary Basin**			
2.1	A point of clarity was raised regarding the existence of the Kavango basin as it seems that, the basin is known and therefore oil and gas production operations will be undertaken later on.	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021 and during the Afternoon Session.	A response was given such that, the Sedimentary Kavango Basin is not known. The ongoing site specific stratigraphic well drilling operation is intended to confirm the existence of such sedimentary basin. The proposed ground geophysical 2D seismic survey will be undertaken to search for potential geographical structures that could hold feasible/ economic oil and gas reservoirs.	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment) EMP Chapter 3 (Specific Mitigation Measures)
2.2	In what form is oil and gas present in the sedimentary basin and how will this be extracted?	🗣 = Community Consultation Meeting at Gcaru, Kavango West Region. 24 January 2021	A response was given such that, oil is in liquid form either in thin liquid where it flows easily or thick liquid. Gas is in its natural gas form. Oil is formed in the same way as in for example cooking porridge in a pot. You have the liquid form cooking, boiling and forming gas above. If the lid is covered on the pot, pressure would be created this is similar to the surface matter on the ground and subsurface creating pressure to as deep as for instance “4 km” below. The deeper it gets the higher the temperature rises. If you open a hole through the lid, that pressure will force the gas upwards and the porridge. This is a similar process to drilling through the earth where petroleum structure is present however the process is done with extra caution to avoid accidental eruption of gas and oil.	
3.	**2D Seismic Survey and or Stratigraphic Well drilling Activities**			
3.1	A question was raised regarding whether the delineated 2D Seismic lines would run beyond the area of interest? .	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, the proposed 2D seismic survey lines would extend beyond the area of interest, this is required to understand the extent of subsurface structures and the potential hydrocarbon reservoirs that could be associated in basin margins. It is in these basin margin that feasible hydrocarbon could be found	
3.2	A question was raised relating to how often the Seismic survey equipment would “Explorer 860” would have to move back and forth to collect the required readings during the process of surveying.	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	The seismic survey will be undertaken on seismic survey lines that includes already existing gravel roads by the use of the Explorer 860’s Accelerated Weight Drop as energy source emitted into the subsurface. Geophones as receiver points that collects the emitted energy will be plotted along the survey line, spaced at distances. Once the energy source has been emitted and the geophones have collected the	EIA Report Chapter 3 Proposed Project Description

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			feedback energy the process will move forward and cover another distance in a single file. There will not be a back and forth process.	
3.3	A question was raised regarding the potential impact associated with the emitted seismic energy wavelengths into the ground on wildlife. This aspect was compared to marine mammals such as dolphins that use wavelength to get around places, would the emitted energy have any implications on wildlife including elephants in the area.	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, a biodiversity specialists study is part of the EIA process. The findings from the study would be presented at a later stage. It was also further emphasized that elephants' migratory routes are not in the specific areas where seismic surveys would be undertaken. Elephants use wavelengths at night, seismic activities are only undertaken at daylight.	EIA Report Chapter 3 Proposed Project Description
3.4	A question was raised regarding how long the seismic operation would be undertaken?	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, the proposed 2D seismic operation will be implemented into different phases including Pre-survey scouting, Planning and Mobilization of equipment, The actual survey activity, Demobilization and completion of the survey. This could be executed within a 3 months period. However, the survey can't be undertaken without an EIA process completed and approved ECC.	
3.5	Will the proposed 2D seismic survey lines be undertaken only to extend into the area of stratigraphic wells?	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, sedimentary basin margins are potential traps for oil reserve structures and therefore the boundary of the survey lines are extended beyond the specific area of interest to de-risk potential error in the survey.	
3.6	A question was raised as to whether any seismic activities are being undertaken currently?	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, no such activities are being implemented without an EIA process. We are at the Scoping phase of the EIA for the proposed 2D seismic activities until at such time an ECC is issued by the regulating authority MEFT then we can implement the Seismic activities.	
3.7	A comment was raised such that, the period of 1 month proposed to undertake the 2D seismic survey operation is quite very short in relation to the 450km distance of survey lines to be covered. In addition to this, another comment was raised relating to the flora studies proposed to be undertaken within a similar timeframe of a month such that this is not adequate time required to undertake a detailed flora study covering a distance of 450 km.	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021	A response was given such that a scope of work is given to a biodiversity specialist. The specialists then decides "depending on the magnitude of the project and its location" what the terms of reference for undertaking a biodiversity study and associated timelines for completing the studies. A detailed flora survey study for the proposed 2D seismic survey lines in already disturbed and existing gravel access roads is irrelevant as there is no flora in the access roads used on daily basis by local commuters. A detailed flora survey would only be required if new cut lines are proposed through undisturbed areas such as community forests. However, ReconAfrica is undertaking a biodiversity specialist study to understand the	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment)

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			type of flora and fauna that exists in the surrounding areas. This is required for planning purposes of the seismic survey. The Seismic survey operation will be mobilized by an international company. Various steps will be followed prior to the actual seismic survey activity "Data Acquisitions" that could be completed in a month.	EMP Chapter 3 (Specific Mitigation Measures)
3.8	A point of clarity was requested in terms of the extent of the proposed survey lines covering an area of 450 km.	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021	A response to the above was given as follows: • The survey lines are measured in distance from one point to the next i.e. East to West and North to South direction, the totality in distance of all survey lines amounts to 450km. • The Survey line Map illustrated during the presentation details the extent of the survey lines at different locations.	
3.9	A comment was raised such that, regular maintenance of the access gravel roads proposed for the 2D Seismic Surveys and used for transportation purposes to the stratigraphic wells at Kawe and future proposed Well at Mbambi is necessary.	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021		
3.9.1	Shall a resident of Rundu urban community acquire a job from the seismic operations, will accommodation be provided in the remote areas?	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021 (Afternoon Session)	A response was given such that, accommodation will be provided and dependent on what type of activity needs to be implemented. A temporary survey camp will be developed through appropriate consultation with the Traditional Authority and the headmen. There are various conditions that will be implemented to ensure this is done appropriately.	
3.9.2	A question was raised as follows, what is the approximate distance from the existing site of the stratigraphic Well drilling operation at Kawe to Sivaradi and how does the community of Sivaradi relate to that project?	🗣 = Community Consultation Meeting at Sivaradi, Kavango West Region. 23 January 2021	A response was given such that, Kawe is about ± 60 km. The proposed 2D seismic survey line EW5 will be undertaken on an existing access road cutting through this community. This meeting is about the proposed 2D seismic survey line. All ReconAfrica activities concerns the Kavango East and West Regions, communities such Sivaradi are immediate within the immediate area of influence specific to the seismic survey.	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment)
3.9.3	The community acknowledged the good illustrative presentation. However, would not have many questions to raise at this stage as most of the false information doing the rounds in the public is totally different from what has been presented. Perhaps once the seismic survey has been completed and positive findings have been presented, then we will have more questions to raise. The community further acknowledged the presence of the Councilor and Headmen as they would have not had much interest in attending the meeting.	🗣 = Community Consultation Meeting at Sivaradi, Kavango West Region. 23 January 2021		EMP Chapter 3 (Specific Mitigation Measures)
3.9.4	A question was raised such that, where exactly at Gcaru will the seismic survey and possible stratigraphic well drilling will be undertaken?	🗣 = Community Consultation Meeting at Gcaru, Kavango West Region. 24 January 2021	A response was given as such that, there is no fixed location for stratigraphic well drilling yet it is anticipated it will be in this area. When ReconAfrica has made the decision, the Traditional authority will be consulted to advise	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			whether that specific area is available for the future stratigraphic Well drilling activities. The 2D seismic survey activities will be undertaken in the access road just opposite this meeting representing the proposed EW5 survey line.	
3.9.5	A question was raised such that, shall the data finally be collected from the 2D seismic Survey and stratigraphic drilling operation, where will it be sent for analysis?	🗣 = Community Consultation Meeting at Ncuncuni, Kavango West Region. 25 January 2021	A response was given as follows: That data collected will only be analyzed out of the country, perhaps in the USA.	
3.9.6	A point of clarity was requested as to how long will the operation take from the point of data collection resulted from the proposed 2D seismic survey and the existing stratigraphic Well drilling operation to the actual Oil and Gas Production?	🗣 = Community Consultation Meeting at Ncuncuni, Kavango West Region. 25 January 2021	A response was given as follows: Since 2015, it took ReconAfrica about 4 years to come to conclusive as in what specific locations in Kavango West and East regions to set up the stratigraphic well drilling. The stratigraphic well drilling operation will take at least a year to complete. The proposed 2 D seismic Survey will begin later this year and last until the end of the year. It will take another year to analyze all this data collected, perhaps then it will be required to confirm feasible oil reserve by undertaking further exploration drilling operation. Shall the drilling activities present more positive results, ReconAfrica will take another 4 years before any actual production.	
3.9.7	There have been similar seismic survey operations undertaken in Kavango Region, do you have insight on what the results of that operation have been?	🗣 = Community Consultation Meeting at Ncuncuni, Kavango West Region. 25 January 2021	A response was given such that, there is no information at this moment present about the findings.	
3.9.8	We the community of Makandina are curious about what activities are being undertaken on the project site that is not far away from this area. Public access to the area is restricted, structures including the drill rig is already set up, how will we know exactly what's being undertaken in our neighborhood if access is restricted?	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	A response was given as follows: The stratigraphic well drilling site is not for public access due to security and safety protocols that needs to be adhered to in order to avoid any injury to any member of the public including the team working on the rig. We can't even get access to the site without communication and an approval from the management. There is safety and security protocol that is undertaken before we even enter the site. The current team on site also have restrictions to certain areas on site that is not within their terms of services.	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
4.	**2D Seismic Survey activities' potential impacts associated with community forests**			
4.1	Community forests are part of the PEL area, how will these be managed? assistance in widening these roads, appropriate measures will be undertaken through consultation with the Forestry Department.	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, the proposed 2D seismic survey lines are within already existent and disturbed gravel access roads to various locations including settlements. No forests are proposed to be cleared. Certain access routes may be too narrow, however, shall the community within the area of interest request the assistance in widening these roads, appropriate measures will be undertaken through consultation with the Forestry Department.	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment) EMP Chapter 3 (Specific Mitigation Measures)
4.2	Relevant to the seismic Survey, are you aware of community forests and conservancies both in the West and East regions of Kavango? There could be community members against the project perhaps due to the activities being undertaken in the community forests or the conservancies or within the boundaries.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	All the proposed 2D seismic survey lines will be undertaken in already existing roads. Relevant to the question and taking an example of the proposed survey line EW4 in Ncuncuni constituency. This line is through a community forest. However, it is through an existing access road that's being used by the community and the Forestry department of the Ministry of Environment Forestry and Tourism (MEFT) that we will be working closely with on this project. Another example is the EW1 survey line through the community forest, this line is in an existing gravel highway used by daily commuters and trucks.	
5.	**2D Seismic Survey activities and or existing Oil & Gas Stratigraphic Well drilling activities' potential impacts to land owners**			
5.1	Shall the proposed 2D Seismic survey result in positive findings on or close to a communal land belonging to a farmer, there is fear that the owner of that land has no exclusive rights to overrule the state's decision to go ahead with the actual production on that specific land. Will the owner of the land be relocated and how will this negotiation be undertaken?	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	In Namibia there are various laws that governs access to exclusive rights to natural resources. The State has exclusive rights to Subsurface natural resources a process is followed in order to obtain access to these resource in this regard the Petroleum Exclusive Licenses relates to subsurface rights of petroleum exploration and possible production. ReconAfrica has applied for access to the subsurface rights in this regards PEL 78. In order for ReconAfrica to exercise these rights to conduct 2D Seismic Survey although these activities will be undertaken in already existing roads there may be certain sections of these road that may require widening or certain sections that could cross through communities, it is relevant in this regard to	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment)
5.2	How are you going to manage people that leave closer to the drilling operations and what are the distance restrictions from the area of operation.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021		

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			consult the surface rights owners in this regards the Traditional Authorities, headmen's and the local community in these areas prior to any activities. Shall seismic survey lines infringe on farming grounds or crop fields, there would be a sort of compensation agreement with the surface rights owner i.e. owner of the field, there is no need for relocation or move structures due to seismic activities this also applies to oil production, shall oil be discovered on your land it could be accessed from a different location without infringing on any of your surface rights activities. Shall there be a discovery of Gas, a similar process of consultations and agreements would be applied.	EMP Chapter 3 (Specific Mitigation Measures)
5.3	Are you aware that the owners of the land at Mbambi area proposed for the second stratigraphic well drilling operation were not adequately consulted and letter pledging answers to how this land was acquired has been circulating from different offices.	🗣 = Public Consultation Meeting at AMTA (**Morning and Afternoon session**), Rundu 22 January 2021.	A response was given such that, the land issue is being discussed with the Traditional Authority in the area and is not part of the Seismic Survey project.	EIA Report Chapter 4. Legislative Framework
5.4	A question was raised such that, the Traditional Authorities are the custodian of communal land, what are the benefits this project will bring forward to the authority?	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021	Relevant to the Exploration and drilling programme, clauses to the benefits between the government and Petroleum Exploration Applicant are detailed in the Model Petroleum Agreement. Conditions relating to procurement of services and technical skills are clearly stated in the MPA.	
5.5	We do understand that the seismic survey will be undertaken on existing access roads. Shall it so happen that an Oil and Gas field is discovered on the access road close to a community or on someone's land, what will happen to that specific land will that land be expropriated?	🗣 = Community Consultation Meeting at **Mutwegombahe** and **Mbambi** community, Kavango East Region, 8 February 2021.	Refer to Meeting response Reference 5.2 above.	
5.6	It's clear that the community and land owners have surface rights and the state/ Government in terms of minerals exploration have subsurface rights. We also do understand that shall oil and gas be discovered below a land belonging to an individual person or community, production in terms of abstraction of the oil could be done elsewhere without infringing on the land owners' surface right. Will there at least be benefits for the owner of the land understanding the oil is below their grounds?	🗣 = Community Consultation Meeting at **Mutwegombahe** and **Mbambi** community, Kavango East Region, 8 February 2021.	A response was provided as follows: There will be an opportunity to discuss and negotiate benefits to not only the owners of the land but the entire community. The approach is similar to that of the mining industry and there are laws within the Traditional Authority and communal land rights that addresses this aspect. The Namibian government and ReconAfrica have entered into a petroleum agreement that also ensures not only the state benefits but also looks at direct community development opportunities. However, this will be entirely a different process and consultation will be undertaken at that stage when Oil and Gas has been discovered and feasible for economic purposes. The focus at this stage is data collection through the 2D Seismic survey and Stratigraphic Well drilling activities.	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
6.	**Media backflash**			
6.1	During the public meeting it was acknowledged that the information presented from the PowerPoint presentation offered by Dr Mwiya and the posters displayed providing more additional information is totally different from that which the media has been sharing to the public. That specific information from the media has created a lot of fear and misunderstanding among people and their communities. We would like to encourage ReconAfrica to continue with the public consultations' meetings in the different communities especially at Ncuncuni, Ncamagoro and the surrounding communities at Kawe and Mbambi. Most of the questions and comments raised in this meeting are based on information currently circulating in the public. The meeting today clearly details the approach that only relates to collection of data at this stage.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021		EIA Report Chapter 1 Project Background
6.2	A comment was raised such that, there is a lot of misleading information presented by the printing and social media confusing the Kavango Delta which is in a different country connecting it into Namibia can ReconnAfrica organize or undertake monthly public briefings, or a press conference in order to refute some of this misleading information causing confusion in the local communities.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021		
6.3	During the presentation, the headmen pointed out that certain journalists have visited communities ahead of the community consultation meetings without the consent of the Headmen and or Traditional Authorities.	🗣 = Community Consultation Meeting at Ncaute, Kavango West Region. 26 January 2021		
6.4	There is a lot of negative information circulating around communities concerning the entire project in terms of it destroying the immediate environment. What is the motive behind these negative claims if the project entirely will bring much development to the community?	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021	A response was given as follows: The false information circulating about this project has no relation to the locality, neither the detail of the proposed exploration activities of the project. It would be easier to respond if the claim is related to what is being undertaken now at the well drilling location in Kawe and what is proposed as 2D seismic Survey activities in existing gravel access roads infrastructure. From our understanding none of the information raised relates to what is proposed now.	
6.5	The headman acknowledged all the community members for being present to such an important meeting and further highlighted that it is at such a meeting where clarity is provided on all misleading information circulating the communities. The illustration provided has answered many questions.	🗣 = Community Consultation Meeting at Cuma, Kavango East Region. 8 February 2021		
7.	**<u>Existing Oil & Gas stratigraphic wells drilling operation</u>**			
7.1	Based on the seismic survey map presented, clarity was required regarding the number of stratigraphic wells to be drilled based on the existing ECC?	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021	A response was given such that, 3 wells have been approved as illustrated on the presented Map.	
7.2	Shall the Oil and Gas Exploration turn out positive, where will the future produced product be sold?	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	A response was given such that the focus at this stage is the application for an Environmental Clearance Certificate (ECC) required for the 2D Seismic Survey. The 2D Seismic survey together with the ongoing Stratigraphic Well drilling	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			operations will determine the existence of the sedimentary Basin and whether feasible petroleum reservoirs exists in the Area of Interest (PEL. 73), Kavango region. Shall the exploration drilling operation result in positive findings an entirely different process will have to be applied prior to the actual production. At this moment we are only collecting data and don't know oil exists.	EIA Report Chapter 1 Project Background and Chapter 3 Proposed Project Description
7.3	The general public is quite concerned due to the circulation of information from various media channels highlighting that the proposed Oil and Gas Exploration project will have adverse environmental impacts on the groundwater, the Kavango river banks and flora, can this be clarified?	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	A response was given such that, based on the presentation given relating to the project background its location, the proposed 2D Seismic Survey activities that will be undertake in already existing road infrastructure. It is evident that the information shared in the public by the different media is wrong.	
7.4	A question was raised such that, after the data acquisition process of the stratigraphic well drilling and 2D seismic survey present positive findings, who is the proponent that will be appointed to undertake the production phase of the Oil and Gas. Will this data be sold off to a different entity?	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021 and 🗣 = Public Consultation Meeting (Afternoon Meeting) at AMTA, Rundu, 22 January 2021	A response was given such that, the focus at this stage is the proposed stratigraphic well drilling and 2D seismic survey. ReconAfrica and the Namibian government have entered into a petroleum agreement for these activities. Shall the exploration activities prove positive finding, a totally different process will be implemented based on the petroleum agreement requirements.	
7.5	Why is ReconAfrica not discussing plans and methods to be implemented during production of oil and gas shall the existing operation result in positive findings.	🗣 = Public Consultation Meeting at AMTA, Rundu, 22 January 2021	A response was given as follows: It is quite misleading to potential investors to confidently state Oil and Gas exists and already define the method of production as at this stage all that is being undertaken is data collection to confirm the existence of the sedimentary basin and geological structures that could hold potential feasible hydrocarbon for possible commercial production. There is no oil discovered at this stage, we are collecting data as part of the Stratigraphic Well drilling and 2D Seismic survey.	
7.6	A question was raised such that, is there an explanation for not consulting the local community prior to the ongoing stratigraphic drilling operations in order to gather their consent?	🗣 = Public Consultation Meeting at AMTA, Rundu (Afternoon Session) 22 January 2021		
8.	**Petroleum Agreement**			
8.1	Does a business proposal/ plan exist for this operation, this is always a requirement in communal lands that a business plan is compiled for any proposed business?	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021	A response was given such that, in mineral resources industry the business plan provided to the regulators is an Explorations Plan. The Exploration Plan details the methodology and	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
			approach for the project implementation. This plan is also included on the first page in the Draft scoping report's project background. However, detail about the projects costs are underpinned in the petroleum agreement. The petroleum agreement is a confidential document. A generalized standard petroleum agreement is available on the Ministry of Mines and Energy (MME) online portal and is termed as Model Petroleum Agreement (MPA). It details all the requirements, percentages in share agreements etc. The standardised document is given to the Petroleum Exploration Applicant by the MME specifying the terms of agreement to be entered into with the Namibian government.	EIA Report Chapter 1 Project Background, Chapter 3 Proposed Project Description and EIA Report Chapter 4. Legislative Framework
8.2	Why is the petroleum agreement with the Namibian government secretly held and avoided from the public as people in the Kavango Region are unaware on what the terms and conditions raised in the agreement?	🗣 = Public Consultation Meeting at AMTA, Rundu 22 January 2021	See above	
9.	**EIA process for the proposed 2D seismic survey**			
9.1	Clarity was requested on further illustration on how the current EIA process for the 2D Seismic Survey fits in with the existing stratigraphic well drilling operations at Kawe.	🗣 = Stakeholders Engagement Meeting with MEFT, 18 January 2021 and The Public consultation Meeting at Rundu.	A response was given such that a petroleum exploration programme is implemented into 5 different phases, phase 2 to 5 requires a separate EIA process for each phase. ReconAfrica is currently on phase 2 of the project implementation that pertains to the collection of key data sets including the geology, aerial gravity, magnetics and stratigraphic well drilling. An EIA was already undertaken for the ongoing Stratigraphic well drilling operation required to confirm the sedimentary basin and MEFT approved the project in 2020 by issuing an Environmental Clearance Certificate. The next step in the process is to undertake a 2D seismic survey to understand the extent of the sedimentary basin, to search for potential geographical structures/ reservoirs within this basin that may hold feasible commercial oil or gas. The EIA process is currently for this 2D Seismic Survey.	EIA Report Chapter 1 Project Background and Chapter 3 Proposed Project Description and
9.2	Is there going to be feedback to the public after the data collection on both the seismic survey and stratigraphic well drilling operations have been undertaken?	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	A response was given such that, there will be information sharing meetings after the process has been completed.	

Reference #	Questions / Comment / Issue raised	Public / Stakeholders Meeting	Response Given	Additional response and corresponding chapter in EIA / EMP Reports
9.3	A question was raised on whether an EIA process was undertaken for the current stratigraphic well drilling operation, does the current EIA process include both the ongoing drilling operation and proposed 2D seismic survey? .	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region), 20 January 2021	A response was given such that a petroleum exploration programme is implemented into 5 different phases, phase 2 to 5 requires a separate EIA process for each phase. ReconAfrica is currently on phase 2 of the project implementation that pertains to the collection of key data sets including the geology, aerial gravity, magnetics and stratigraphic well drilling. An EIA was already undertaken for the ongoing Stratigraphic well drilling operation required to confirm the sedimentary basin and MEFT approved the project in 2020 by issuing an Environmental Clearance Certificate that is still valid. The next step (Step 3) in the process is to undertake a 2D seismic survey to understand the extent of the sedimentary basin, to search for potential geographical structures/ reservoirs within this basin that may hold feasible commercial oil or gas. The EIA process is currently for the 2D Seismic Survey	EIA Report Chapter 1 Project Background, Chapter 3 Proposed Project Description and EIA Report Chapter 4. Legislative Framework
10.	**Future Public Consultation Meetings**			
10.1	A suggestion was raised such that public feedback sessions should be extended for a longer period to allow sufficient time for the public to raise their concerns relevant to the project.	🗣 = Public Consultation Meeting at Nkurenkuru (Kavango West Region),	A suggestion was raised such that public feedback sessions should be extended for a longer period to allow sufficient time for the public to raise their concerns relevant to the project.	EIA Report Chapter 5, Subsection 5.7 Stakeholder and Public Consultation
10.2	A suggestion was raised such that, shall there be future public consultation or information sharing meetings, the meetings should be organized at Mburundi area as it serves as a central area to for people to commute from Sivaradi 1 and Sivaradi 2.	🗣 = Community Consultation Meeting at Sivaradi, Kavango West Region. 23 January 2021	A response was given as follows: A lot of considerations was put in place to agreeing to a meeting at Sivaradi as being the community with the biggest population in the area. In addition to this, the seismic survey activities would use the existing access road through the community forest that is closest to this community and therefore the council agreed to have this meeting in this community.	
10.3	We do know that shall there be a discovery of Oil and Gas, community consultation meetings such as this one will no longer be encouraged. ReconAfrica will not be seen in the communities. This is a common practice in other countries regarding oil and gas projects.	🗣 = Community Consultation Meeting at Makandina, Kavango East Region. 27 January 2021		

11. REGISTERED STAKEHOLDERS SUBMISSIONS

Reference #	Questions / Comment / Issue raised	Response Given if Any	Formal Response as Addressed in Respective EIA / EMP Reports Chapter
11.1	**From:** Caroline Gelderblom <caroline@gelderblom.co.za> **Sent:** Monday, January 18, 2021 9:27 AM **To:** 'smiwiya@rbs.com.na' <smiwiya@rbs.com.na> **Cc:** 'savetheokavango@gmail.com' <savetheokavango@gmail.com> **Subject:** Okavango Oil and Gas exploration Dear Dr Mwiya I would like to register my concern about the proposal to do seismic testing in the Okavango and request that the time for comment is extended for a further 30 days in view of it being over the holiday season and with further complications caused by the Covid-19 pandemic. There was not enough time to scrutinise a project of this complexity and significant potential impact. From my personal involvement in the Strategic Environmental Assessments for Shale Gas Exploration in the Karoo I know that the exploration is undertaken in a systematic grid pattern which will result in substantial off road disturbance which will significantly impact the environment. This would reduce the wilderness characteristics of the area which is critical for tourism – this was the area of my expert input in the previous SEA. The sonic disturbance associated with the testing is also likely to have a significant negative impact on sensitive local wildlife especially elephants. This is a major concern in view of the international importance of this area for conservation. Any increased traffic in this area also increases risks of poaching. This is aside from the significant impacts that any actual exploitation would have on the freshwater resources of the region. It is also important to note that most of the long-term jobs are technical and unlikely to benefit people currently living in the area – this needs to be made clear to local communities in addition the fact that once extractive activities are withdrawn the viability of tourism would be significantly reduced as a result of the altered sense of place. Yours sincerely Caroline Gelderblom (Registered Professional Scientist)	The Proponent only agreed to extend the time for comment from 29th January to 12 February 2021. The concerns of the stakeholders have been addressed in the EIA and EMP Reports.	EIA Report Chapters 4 and 5
11.2	**From:** Danie Toerien <ToerienD@ufs.ac.za> **Sent:** Tuesday, January 19, 2021 10:28 AM **To:** Caroline Gelderblom <caroline@gelderblom.co.za> **Subject:** Re: Shale Gas SEA. - new proposal for Oil and Gas Exploration in the Okavango Dear Dr Mwiya Because of limited information at this stage, I am concerned about the proposal that seismic testing be done in the Okavango catchment. Please extend the time for comment for a further 30 days given the impacts of the holiday season and complications caused by the Covid-19 pandemic. I was personally involved with the former Namibian Department of Water Affairs in assessment of *Salvinia molesta* infestation and its control in the Linyanti swamp in Caprivi. In addition, I was part of a team that studied Lake Liambezi as well as the team that carried out the Strategic Environmental Assessments for Shale Gas Exploration in the Karoo. I am aware that the planned exploration could significantly impact the environment and could be to the detriment of freshwater resources, activities such as tourism and of nature conservation. Given the decreasing importance of non-renewable energy sources in the world, the decisions about the proposed exploration in the Okavango catchment should be based on the best available knowledge, which seems to be lacking now.	From: Dr Sindila MWIYA <frontdesk@rbs.com.na> Sent: Thursday, 21 January 2021 9:09 AM To: 'Danie Toerien' <ToerienD@ufs.ac.za> Cc: 'marvinconsultants@outlook.com' <marvinconsultants@outlook.com> Subject: RE: Seismic testing in Okavango catchment Importance: High Dear Dr Toerien, Thank you very much for your inputs below. Unfortunately, there will be no extension provided and the environmental assessment process we have implemented is in full compliant with the regulatory requirements. I am familiar with the areas and projects you are referring to in your email below. I grow-up in Zambezi Region (former Caprivi) and know the area very well right into Western province of	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment) EMP Chapter 3 (Specific Mitigation Measures)

	Yours sincerely Dr Daan Toerien **Danie Toerien** Research Fellow: Centre for Environmental Management Navorsingsgenoot: Sentrum vir Omgewingsbestuur Faculty / Fakulteit: Natural and Agricultural Sciences / Natuur- en Landbouwetenskappe PO Box / Posbus 339, Bloemfontein 9300, Republic of South Africa / Republiek van Suid-Afrika +27 (0)28 754 3623 +27 (0)82 770 9473 ToerienD@ufs.ac.za	Zambia. Since 2010, I have supported many companies conducting petroleum exploration operations in northern and north-eastern Namibia. I have been involved in aerial and ground seismic survey operations and as such I do not see how a 2D seismic survey being conducted along existing roads and tracks used by many other road users will now have major negative impacts on the Okavango Catchment area, freshwater resources and other non-existences activities around Ncaute, the general area of interest. What is being undertaken is nothing but subsurface resources exploration operations in a greenfield area. Please see attached Draft Scoping Report in case you did not receive it and if possible pay a field visit to the area of interest and see for yourself. Many thanks, Dr. Sindila Mwiya	
11.3	**From:** Marilyn Lilley <marilyn@rsaweb.co.za> **Sent:** Wednesday, 13 January 2021 11:00 AM **To:** smwiya@rbs.com.na **Cc:** marilyn@rsaweb.co.za **Subject:** Register as an I&AP re PEL 73 2D Seismic survey **Importance:** High Dear Dr Mwiya, I wish to please register as an Interested and Affected Party for the PEL 73 2D Seismic Survey . Please can all the relevant related documents, and including the BID document be forwarded to me. 1. Please can you confirm the exact total area applied for that will be covered by 2-D seismic testing. 2. Can you confirm if any 3-D seismic testing planned? Will it be included as additional seismic testing as part of or during this seismic survey process? 3. Is there an EIA for 2D and for 3Dseismic testing and is it available? 4. Are there regulations in place for seismic testing and is this available? 5. I believe that a public meeting should also be held in Windhoek as part of the democratic inclusive public participation process. 6. Is a meeting in Windhoek being arranged? if so can you please confirm the date, venue and time? 7. Has an impact assessment been done on any possible impacts on animals, and especially elephants? https://www.youtube.com/watch?app=desktop&feature=player_embedded&v=tQxC8ahSdkg&fbclid=IwAR3ykDn4rRF_BZJe0dAp1wDrKh4EUkbWD_YyLRETvbizdk-r5KVO16G4s0s8. 8. Will any communities need to be moved out of the vicinity of the lines of thumper trucks and related equipment? 9. How will ground water be protected from any impacts? 10. Have any recent indepth surveys been conducted in these areas under 2D – and any 3D- application in the past year to determine the structures below ground as there may have been movement from the time that any past surveys were conducted with changes to structures and paths of ground water. – that may impact the water availability to communities that depend on this existing ground water. Thank you Kind regards, Marilyn Lilley	No written was issued. The question was asked prior to registration as stakeholder and a Scoping Report was provided. Appropriate considerations to the submission have been made. However, much of the 2nd part of the submission deals with oil production which is completely outside the scope of this EIA.	EIA Report Chapter 3 Proposed Project Description and Chapters 5 (Receiving Environment) and 6 (Impact Assessment) EMP Chapter 3 (Specific Mitigation Measures)

From: Marilyn Lilley <marilyn@rsaweb.co.za>
Sent: Friday, 12 February 2021 11:54 PM
To: Teofilus.Nghitila@met.gov.na; smwiya@rbs.com.na; frontdesk@rbs.com.na
Subject: I&AP - additional comments re extended deadline 12 Feb 2021 FW: comments - Proposed 2D Seismic Survey Operation in PEL 73

Additional comments to those that I have previously submitted – as per extended deadline 12 Feb 2021
Please reply with A WRITTEN ACKNOWLEDGEMENT OF RECEIPT
Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya Environmental Assessment Practitioner (EAP).
REF ReconAfrica's Seismic EIA Scoping Report.
I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia.
This is a letter to formally register very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I am concerned about many issues:

1. Are **helicopters planned to be used for any related purpose during the entire seismic survey activities and period**.

This is a known practice used especially **in remote areas for transporting eg. Related seismic recording equipment to the testing sites.**
1a.This can have **impacts on domestic animals and wildlife, there are reports on this issue**.
1b. Have the impacts of related helicopters on wildlife and domestic animals been researched and the report findings included in the Seismic survey EIA?
1c. Where is this report to be found?

2. Will any **3D seismic surveying** be undertaken **using explosives materials in** the **shot hole seismic survey method?**

2a. Has research been carried out on the **impacts of 2D thumper trucks and 3D shot hole seismic testing on animals including burrowing and nesting underground animals?**
2b. If so where can this report be found?

3. **Seismic testing is known to impact walls of homes and water wells.**

In the scoping report there is no discussion or investigation of the effects of seismic testing on shallow water wells in the region.
There are Hundreds of small communities along the roads where Recon Africa has plans to shoot seismic lines on with huge drop weight method thumper trucks.
Has a full study been carried out of the effect of these seismic testing trucks on shallow water wells next to the roads used for the survey?
In Brunswick, Canada it has been found that seismic testing can damage the wells that people depend of for their drinking water, at least 60 homes there have lost their drinking water.
Baseline water testing needs to be done at every well location then repeating this after seismic testing to assess any possible damage or pollution from the seismic testing.
In the Scoping report there does not appear to be any plans to do any baseline water tests at all and no possible impacts of the testing on water wells appear to be considered. A link to this serious issue in Canada is here: **https://tinyurl.com/y4rygzld**

3a. How will any **damage to local wells** and related pipes and infrastructure, and **damage to building** be mitigated, repaired and compensated?
3b. Who will carry out all repair work?
3c. Who is responsible for all the costs?

4. Are there any **regulations for onshore Seismic Surveying**?
4a. If yes, where is this to be found? **If not, why not**?
4b. If not, How is it possible to permit seismic testing without existing related regulations?

4. Are **there trained expert inspectors in O&G exploration and related activities to monitor all exploration activities in place including seismic testing activities,** and as inspectors able to **un-announced independently**

monitor, inspect, investigate and report on findings, environmental violations and take actions as required? If, not, why not?

5. Where can the **public report any impacts to** that they may experience from seismic survey activities -and from exploration and related activities?

5a. Where can the public find the information on reporting procedures? If no reporting procedures are in place, will this be in place before any seismic testing is permitted to begin?
5b. Where will this be easily found and accessible?

6. The movement of seismic testing crews increases the chances of exposure and spread of COVID-19 among the seismic testing crews and communities, and the outbreak of COVID-19 among crews and communities.

6a. What was the rate of Covid infection in PEL 73 and including data from the drilling areas in September 2020 – and what is the current rate of Covid infections in these same areas to date?
6b. All influx of people -travelling in and out of these areas -including local and foreign crews and personal -by drilling and seismic survey related crews into these areas should be halted until the level of infection drops to protect all rural communities in the drilling and seismic affected areas, including Rundu

Seismic testing is not an essential service – and in any case the rush for gas or oil is for the profits of the company who in their own words will truck it to Grootfontein then transport it by rail to Walvis Bay – where one can surmise that it will be exported by ship and sold on the open markets for company profits.

Protect local populations from Covic spread – stops seismic testing and related travel into these areas by oil and gas related businesses and activities by foreign and local businesses and industries who have never had any business in these areas before.

7. As the results of the seismic testing will ultimately lead to the exploitation or production stage it is important to note the related transport methods of the produced oil or gas from the production well sites by truck to Grootfontein them by rail to Walvis Bay as indicated in Recon Africas presentations.
8. As there was little opportunity to submit comments to the Exploration EIA I include this below as related activities to the seismic testing results here.

9. Below: Some information and examples on the transportation of gas and oil by truck and by rail below:

<u>The safety of the Namibian people should always be above profit.</u>
Oil and gas transportation by truck and train 'Bomb Trucks' and 'Bomb Trains' - health, safety and climate risks
Recon Africa indicates in their presentations that the oil or gas that they find would be taken by truck – from the production area - to Grootfontein, then by train to Walvis Bay – as in other similar instances probably for export for sale on the international markets. Very little if any of this would likely be for Namibia's energy mix or supply.
Recon Africa omits to mention that a large network of gas pipelines infrastructure would need to be constructed from the producing well sites – laid underground, under rivers, or above ground, connected to industrial sized compressor stations constructed at regular intervals along the pipeline needed to compress the gas, with the known related venting and emissions of global warming greenhouse gasses

To transfer the gas to trucks -
'Virtual pipeline trucks, such as those operated by XNG and NG Advantage, pull gas out of pipelines at special compression facilities that compress the gas to 3600 pounds per square inch — more than two and half times the pressure of a typical interstate gas pipeline — and inject it into state-of-the-art cylinders that are then loaded onto the virtual pipeline trucks.'
These trailers are known to be top-heavy & rollover risk

1. Is Namibia responsible for the infrastructures, costs and maintenance of the railway and road infrastructures used by the extremely heavy rail trucks and road trucks transporting this oil and/or gas?
2. What other costs related to oil and/or gas transport by truck and rail is Namibia liable for?
3. Who ensures these infrastuctures and carries the liabilities for any related accidents and costs for any repairs to road and rail infrastructures?

1. Transporting natural gas by truck - Hazardous Materials: Liquefied Natural Gas by Truck

'High-Pressure, 3600 psi Type-4 Carbon Fiber Composite CNG pressure vessels, "Virtual Pipelines"

‘Compressed natural gas- Ultra-High-Pressure CNG #BombTrucks
‘Bomb Trucks’ Ultra-High-Pressure CNG "Virtual Pipeline" tube trailers.
Trailer -eg. @HexagonASA Titan-4
‘Features: ►Increased Rollover Risk ► Completely unregulated! ► MASSIVE risk of fire and EXPLOSION! ► Equal to 130 tons of TNT ► Equal to 11x MOABs (Mother of all Bombs) ► Trucks are MISCONFIGURED! ► Combos weigh 80,000 lbs w/a tractor rated for 53,300’

a. **Virtual Pipelines: A Dangerous New Way to Transport Fracked Gas by Truck**
Read time: 9 mins
By Justin Nobel • Tuesday, May 21, 2019 -
https://www.desmogblog.com/2019/05/21/virtual-pipelines-fracking-compressed-natural-gas-trucks?fbclid=IwAR2sXXf5N2DGWh6KX3uX_XW63XrsAVYfZog7JQBqw_Ml1tcY_0IDNyfQ26c

b. JANUARY 23, 2020 10:37 PM UPDATED A YEAR AGO
Gas truck explodes in Lima, killing two and injuring dozens
https://www.reuters.com/article/us-peru-accident/gas-truck-explodes-in-lima-killing-two-and-injuring-dozens-idUSKBN1ZM2ZJ?fbclid=IwAR2NkQfsPebATjqR93Jqlkbwm8_O1hQUmSoidY6OukabSJYuN8PLTVgRNa4

Lima, Peru: natural gas tanker truck explodes after hitting a speed bump, 2 dead, at least 48 injured, 20 homes destroyed. Health Minister Elizabeth Hinostroza said more than 50 per cent of the victims were in "very critical" condition, with burns covering more than 80 per cent of their bodies. At least 11 children were sent to local hospitals with severe burns, the authorities said.
‘NOTE: This is a steel bottle tank, with a much lower capacity than Virtual Pipeline Tube-Trailers. Also note the visible vapor cloud. The industry says this can't happen! ‘

2. Transporting natural gas by train #BombTrains- Hazardous Materials: Liquefied Natural Gas by Rail

a. **What You Should Know About Liquefied Natural Gas and Rail Cars**

https://earthjustice.org/features/liquefied-natural-gas-lng-by-rail-tanker-car

How dangerous is it to transport liquefied natural gas by rail tank cars?
The liquefied natural gas from just *one rail tank car* — without even considering a whole train — could be enough to destroy a city.
It would only take 22 tank cars to hold the equivalent energy of the Hiroshima bomb. A train of 110 tank cars filled with liquefied natural gas would have five times the energy of the Hiroshima bomb.
In the event of any loss of containment, liquefied natural gas rapidly expands by six hundred times its volume to become a highly flammable gas — and can turn into a “bomb train.”
Since liquefied natural gas must be contained in a pressurized and temperature-controlled storage unit, it can also produce a BLEVE — “boiling liquid expanding vapor explosion.”
During a BLEVE, pressurized liquid ‘explodes’ both chemically and physically (simultaneously vaporizing and combusting). A BLEVE creates three primary dangers:
A blast wave,
Projections of the container fragments, and
In the case of flammable vapors, a fireball…

3. Transporting crude oil by truck
a. **Crude Oil Transportation** by **Truck**
Over-the-road **transportation** is the most expensive and inefficient means of **crude oil transportation**. The amount of **crude oil** an average **truck** can **transport** is only between 200-250 barrels of **oil** per movement. This makes it an expensive and inefficient option.01 Nov 2019 https://www.breakthroughfuel.com/blog/oil-in-motion-visibility-into-crude-oil-transportation/#:~:text=Crude%20Oil%20Transportation%20by%20Truck,an%20expensive%20and%20inefficient%20option.
An analysis **of** studies on suitability **of** tanker **trucks** as a mode **of crude oil transportation** has demonstrated that it is highly inefficient, ineffective, and hazardous. **The** studies indicate that tanker **trucks** have an elevated **risk of** explosion, a high collision **risk**, and are hazardous to **the** environment.

b. From Tanker Trucks to Trains. Safety in Oil Transportation
Term Paper, 2016
MUSAAD ALRUWAILI (AUTHOR)
https://www.grin.com/document/503718#:~:text=An%20analysis%20of%20studies%20on,are%20hazardous%20to%20the%20environment.

'Despite the company's awareness of the need for effective, efficient, and safe strategy for oil transportation, it is heavily reliant on a mode of oil transportation (tanker trucks) that it is anything, but safe, efficient, and effective. '
'
'Nonetheless, it is important to note that each means of transportation differently affects public health, the environment, and safety. In this perspective, a risk is a possible occurrence of an incident.'

'Conclusion
'An analysis of studies on suitability of tanker trucks as a mode of crude oil transportation has demonstrated that it is highly inefficient, ineffective, and hazardous. The studies indicate that tanker trucks have an elevated risk of explosion, a high collision risk, and are hazardous to the environment.'

4. Transporting crude oil by train

a. Canada
Are rail tanker cars vulnerable to explosive disasters?
Yes. In 2013, a train carrying crude oil — less explosive than liquefied natural gas — derailed in Lac Mégantic, Quebec. The resulting fire led to BLEVEs — "boiling liquid expanding vapor explosions" — of numerous tank cars, which leveled the town center and killed 47 people.
A BLEVE of a liquefied natural gas tank car would be expected to produce a fireball up to a mile wide and would be significantly more powerful than what happened in Lac Mégantic.
"It would only take 22 tank cars to hold the equivalent energy of the Hiroshima bomb," said Earthjustice attorney Jordan Luebkemann. "It's unbelievably reckless to discard the critical, long-standing safety measures we have in place to protect the public from this dangerous cargo. That's why we're filing this challenge."
https://earthjustice.org/features/liquefied-natural-gas-lng-by-rail-tanker-car

b. Canada
Bomb Trains,' a New Book on the Deadly, Ongoing Threat of Oil by Rail
Read time: 7 mins
By Justin Mikulka • Tuesday, July 9, 2019
https://www.desmogblog.com/2019/07/09/bomb-trains-oil-rail-threat-book

c. Transporting crude oil by rail tanker
Are rail tanker cars vulnerable to explosive disasters?
Yes. In 2013, a train carrying crude oil — less explosive than liquefied natural gas — derailed in Lac Mégantic, Quebec. The resulting fire led to BLEVEs — "boiling liquid expanding vapor explosions" — of numerous tank cars, which leveled the town center and killed 47 people.
A BLEVE of a liquefied natural gas tank car would be expected to produce a fireball up to a mile wide and would be significantly more powerful than what happened in Lac Mégantic.

d. Canada
Canadian Town Evacuated After Another Oil Train Derails and Burns
Read time: 3 mins
By Justin Mikulka • Thursday, February 6, 2020
https://www.desmogblog.com/2020/02/06/guernsey-canada-evacuated-second-cp-oil-train-derail-fire

e. Canada
Canadian train derailment highlights debate over crude oil transportation
http://america.aljazeera.com/articles/2013/10/20/canada-train-derailmenthighlightsdebateovercrudeoiltransportatio.html
A train carrying crude oil and liquefied petroleum gas derailed and caught fire in western Canada Saturday, raising more questions about rail safety that became a major issue after a runaway oil train derailed in a Quebec town in July, triggering deadly explosions.

	f. Canada **Are rail tanker cars vulnerable to explosive disasters?** Yes. In 2013, a train carrying crude oil — less explosive than liquefied natural gas — derailed in Lac Mégantic, Quebec. The resulting fire led to BLEVEs — "boiling liquid expanding vapor explosions" — of numerous tank cars, which leveled the town center and killed 47 people. A BLEVE of a liquefied natural gas tank car would be expected to produce a fireball up to a mile wide and would be significantly more powerful than what happened in Lac Mégantic. "It would only take 22 tank cars to hold the equivalent energy of the Hiroshima bomb," said Earthjustice attorney Jordan Luebkemann. "It's unbelievably reckless to discard the critical, long-standing safety measures we have in place to protect the public from this dangerous cargo. That's why we're filing this challenge." https://earthjustice.org/features/liquefied-natural-gas-lng-by-rail-tanker-car g. Canada The **Lac-Mégantic rail disaster** occurred in the town of Lac-Mégantic, in the Eastern Townships region of Quebec, **Canada**, at approximately 01:15 EDT,[1][2] on July 6, 2013, when an unattended 73-car freight train carrying Bakken Formation crude oil rolled down a 1.2% grade from Nantes and derailed downtown, resulting in the fire and explosion of multiple tank cars. Forty-two people were confirmed dead, with five more missing and presumed dead.[3] More than 30 buildings in the town's centre, roughly half of the downtown area, were destroyed,[2][4] and all but three of the thirty-nine remaining downtown buildings had to be demolished due to petroleum contamination of the townsite.[5] Initial newspaper reports described a 1-kilometre (0.6 mi) blast radius.[6] The death toll of 47 makes it the fourth-deadliest rail accident in Canadian history,[7] and the deadliest involving a non-passenger train. It is also the deadliest rail accident since Canada's confederation in 1867.. https://en.wikipedia.org/wiki/Lac-M%C3%A9gantic_rail_disaster 10. Are the signatories to the agreements with Recon Africa and the granting of permits, the exploration licence and possible granting of the seismic survey licence aware of all the following related activities and infra structures required, and the possible extremely high financial costs including the high costs to health, water, environment, health, and safety ongoing to Namibia- for 20 years or more? 11. I believe that the seismic survey licence should not be granted for among many others, the reasons above Thank you, Yours sincerely, Marilyn Lilley Cape Town South Africa		
11.4	**From:** #FridaysforFuture Windhoek <fridaysforfuturewhk@gmail.com> **Sent:** Monday, 25 January 2021 4:12 PM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na; save the okavango delta <savetheokavangodelta@gmail.com> **Subject:** Interested Party for 2-D Seismic Survey EIA Dear Dr Mwiya, I would like to register as an Interested and Affected Party for the Seismic Survey EIA being carried out by RBS on behalf of ReconAfrica. I would like a full suite of the BID documents, all documents of every kind pertaining to this activity including but not limited to specialist studies on seismic testing in the area, maps showing where the testing will occur and could occur, as well as an outline of the equipment to be used and the contacts of the scientists who have carried out the specialist studies. Bellow are my concerns • The EIA had incomplete baseline data. The assessment, consisting only of desktop studies without any fieldwork, is not robust enough to justify the proposed drilling.	**From:** #FridaysforFuture Windhoek <fridaysforfuturewhk@gmail.com> **Sent:** Thursday, 28 January 2021 12:45 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** save the okavango delta <savetheokavangodelta@gmail.com>; marvinconsultants@outlook.com **Subject:** Re: Interested Party for 2-D Seismic Survey EIA Just a special reply to this one, What we are witness and will continue to see is environmental protection-based colonialism aimed at perpetuating the current and future generational poverty in Kavango West and East Regions, Namibia and Africa as a whole. It is typical of the colonial times, when religious books were waved in villages,	EIA and EMP Reports and Annexes

	• Habitat fragmentation: extracting and transporting oil and gas fragments the habitat and cuts across animal migration routes. The project will require new roads that could fragment the habitat affecting wildlife (facilitate poaching, affecting elephants, lions, primates and other high-value species). • Noise can affect local people and wildlife (elephants, birds, etc.). • Wildlife loss will affect local people's livelihood: "Biodiversity is a determinant of public health—without these wild animals doing ecosystem services for us, we can't survive." Elephants, for example, fertilize and seed trees with their dung and excavate the ground, opening up water sources for other animals. [Sandra Steingraber]. • The pits to store drilling mud and water described in the assessment are so big that ReconAfrica's plans for its test wells already may include fracking and may not have been fully disclosed to the Namibian government. (ReconAfrica denies that it plans to use fracking during the exploratory phase, and the Namibian government did not respond to questions about potential fracking plans.) • ReconAfrica's test wells will require large quantities of water. They'll also produce large volumes of "cuttings"—polluted rock removed from the drill hole. ReconAfrica's assessment says the source for the water will be the Omatako River, which flows underground most of the time. • Details about water needs for the test wells, which should be addressed, are neglected in the EIA. That includes the volumes of water needed, the number of boreholes, where the water will be taken from the Omatako, how the extraction of water could affect nearby water wells or surrounding communities, and the disposal and treatment of wastewater from drilling. The assessment acknowledges, however, that ephemeral rivers are of "special ecological importance in Namibia due to [their] biotic richness, large mammals, high value for human subsistence and tourism." • There is no certainty that the drilling fluids would be managed and disposed of safely. • People in the area rely on groundwater for their subsistence. There is no assessment of how the exploratory drilling could affect the local people's access to water. • ReconAfrica's assessment "does not meet with the standards of comprehensive unbiased and scientific investigation required," said Jan Arkert, a consulting engineering geologist who's based in Uniondale, South Africa, and has worked for decades on drilling-related projects. • "It is shocking that this EIA was authorized at all," said Avena Jacklin, a former environmental consultant in the mining sector. She confirmed that the assessment didn't include interested and affected parties and "left out key assessments and specialist studies…and has not identified alternatives to fracking," such as solar and wind power. "None of this has been laid out in the EIA." • [The U.S. Environmental Protection Agency estimates that it takes about 1.5 million gallons of water to frack a single oil and gas well. A water tanker that holds 3,000 gallons would have to make 500 journeys for each well]. • An influx of oil workers into this remote landscape—and the money, roads, alcohol, and pollution they'd bring—would jeopardize the traditional way of life of the San, said Jennifer Hays, a professor of social anthropology at the Arctic University of Norway. Lack of public participation in the EIA process • The local people (including some indigenous groups) did not know about it and it is very difficult to get a copy of the EIA report. • Namibian law provides for a powerful environmental safeguard, which allows any person, organization, or agency to be an active part of the review process for projects such as this by becoming registered as interested and affected parties; the interested parties are then supposed to be informed and consulted as the review proceeds. This legal protection for the environment and communities apparently was not fulfilled during the environmental impact assessment process. • "People in the area get their water from hand-dug wells and small hand pumps, Arkert said. "What happens if the company drops the groundwater table and people who live there can no longer access the water they have relied upon for generations?" Thank you so much for your kind assistance,	jungles, savannahs, wetlands, and deserts while at the same time those who were waving the religious books were busy harvesting local resources including slaves and today environmental placards and online messaging are being pushed by opportunistic environmental messiahs benefiting or wanting to benefit in the name of environmental protection through donations and for their own personal, family and friends incomes drives, while the local masses in Namibia continue to swim in multiple inherited generational poverty. The advocacy space has become crowded with environmental champions including opportunistic and blinded local people seeking some limelight. Ahh you make me laugh, stop you reverse racism, it's pathetic . Because you are totally right here, it's a perfect text in our decolonisation work. I love it but you are doing the same here. You are giving your birth place to a bunch of Jesus slaves as well. When I read this I think, yes we as African people have the power to do things on our own in our ways. No we don't need all that bull from the west. we have our own knowledge . So yes I agree but you are doing exactly what those Church Slave traders did. you are selling out to the White people 90% to 10% is a sell out. And the reason why those people are still poor is because of corruption in Namibia. So please sir. Mind your tongue. we are a black led movement ! oh and definitely not Christian so yes I agree with but dude i am black women. Best regards , **From:** #FridaysforFuture Windhoek <fridaysforfuturewhk@gmail.com> **Sent:** Thursday, 28 January 2021 12:34 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** save the okavango delta <savetheokavangodelta@gmail.com>; marvinconsultants@outlook.com **Subject:** Re: Interested Party for 2-D Seismic Survey EIA Thank you very much for the clarification and registration You are indeed a very educated man who knows the misery of his people and i highly respect that. But accusing me of being paid is far fetched, I am a SWAPO pioneer for life and we were indoctrinated in the camps. Am talking of SWAPO and not FISHROT so please sir with all due respect, control your temper.	

		So now that we are in a conversation here, tell me what is the difference between fracking and shale. if your investment is really clean, then you really have nothing to worry about. Its just that pipelines are being shut down. Fracking being banned and we are introducing it here. Its quite hilarious actually . Many banks are speaking of stopping to fund the fossil fuels which is why I am wondering what this deal is all about. if you really wanted to help the people of that region you would have and had the means to do it as well but when looking at how much money the state lost to corruption, oh my god, it explains it very well. But for now, I will be patiently waiting for the updates and expect decent replies and not those that intimidate people because you don't intimidate me. Thank you Best regards On Wed, Jan 27, 2021 at 5:56 AM Dr Sindila MWIYA <frontdesk@rbs.com.na> wrote: Dear Interested Stakeholder, I hereby confirm your registration as stakeholder. Your comments / inputs below are misplaced and irrelevant to the scope of the proposed 2D seismic Survey operations. Please see attached the Draft Scoping Report with more detailed information on what oil and gas exploration entails and the facts on the key area of interest which is not the Okavango River or the Okavango Delta as being pushed by uninformed groups like yours with no knowledge or experience about oil and gas exploration. Having worked in the most remote areas of both Kavango West and East Regions since 2010 undertaking petroleum aerial gravity and magnetic surveys, ground seismic surveys and geochemical soil sampling for oil and gas feeding bacterial profiling operations, I have come across families who twice a week leave their woody and grassy homesteads in so called “sensitive environment” and walk for four (4) hours one way to reach the nearest public school where they could fetch water, came across homestead dilapidated to the state that makes your heart sink, came across many educated local people without jobs and with no prospects of emerging out the cycle of multiple generational poverty, came across young people with	

		no any other economic opportunity whatsoever except cattle herding, grass and wood harvesting, came across young people with HIV / AIDS and have stopped taking their antiretroviral therapy due to lack of food or could not reach the nearest clinic in the general area because it is just too far to reach on foot and I have driven through extreme sandy poor access tracks connecting majority of the villages, it is appalling to see that nonindigenous privileged individuals with no knowledge whatsoever about Kavango East and West Regions, the Area of Interest and oil and gas exploration want to see the current status core of underdevelopment and poverty prevailing in both the Kavango West and East Regions centred on inherited generational poverty while themselves thrives in name of environmental protection by soliciting for donations using the project. It is high time that Governments in Africa and especially Southern Africa, Namibia included, move swiftly to regulate the emergence of opportunistic foreign funded environmental clique movements because for one to choose the World-renowned Okavango Delta, Okavango River as well as the San People as the backdrop for personal fund-raising campaigns and drives for donations to the so called “non-profits” and for own personal, family and friends incomes, while the majority of Namibians in Kavango West and East where the true project is situated continue to languish in poverty and illiteracy is unacceptable and such an awful act. What we are witness and will continue to see is environmental protection-based colonialism aimed at perpetuating the current and future generational poverty in Kavango West and East Regions, Namibia and Africa whole. It is typical of the colonial times, when religious books were waved in villages, jungles, savannahs, wetlands, and deserts while at the same time those who were waving the religious books were busy harvesting local resources including slaves and today environmental placards and online messaging are being pushed by opportunistic environmental messiahs benefiting or wanting to benefit in the name of environmental protection through donations and for their own personal, family and friends incomes drives, while the local masses in Namibia continue to swim in multiple inherited generational poverty. The advocacy space has become crowded with environmental champions including opportunistic and blinded local people seeking some limelight. Many thanks, **Dr. Sindila Mwiya**	

11.5	**From:** Margie Pretorius <barefoot.margie@gmail.com> **Sent:** Thursday, 28 January 2021 11:20 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** Submission as an IAP Good day I write to register my objection to exploratory drilling by Recon Africa in Namibia. 1) **There has been inadequate information given to local communities that will be impacted by the drilling, and by the extraction that will follow exploration, in order for them to make a free, prior and informed decision as to whether they consent to the project. The right to FPIC is recognised in the UN Declaration on the Rights of Indigenous People.** I am not a citizen of Namibia but in my work with Sustaining the Wild Coast (www.swc.org.za) I have learnt how governments and corporates worldwide work to persuade rural indigenous communities that extractive industries will benefit them. Governments fail to provide such communities with basic services (such as electricity or water) They then, hand-in-hand with corporates, tell these communities that they are poor and that they need the jobs and so called "benefits" that mining will bring. They fail to inform these communities of the negative impacts that mining will have on their land based livelihoods, and that very few of them will have the necessary skills to be employed by the mining companies. They fail to mention that any short term gains of a mining boom will be far eclipsed by the multifaceted and longterm negative impacts of mining. Governments fail to acknowledge that basic service delivery to all citizens should not be dependent on them being willing to accept use of their land for extractive industries which primarily benefits the companies executing the mining projects and the government officials that approve them. 2) **The cumulative impacts of the project have not been adequately assessed in the scoping report.** In response to objections to exploratory drilling governments and corporates always emphasize that exploratory drilling does not constitute extraction, and that environmental approval processes prior to extraction will protect residents and the environment from any negative impacts of extraction.Unfortunately, this piecemeal/compartmentalized approach to extractive processes is misleading, because exploration inevitably leads to extraction. It is irresponsible of governments and corporates not to ensure that the cumulative impacts of projects are not evaluated prior to any exploration taking place. 3) **The cumulative impacts of gas extraction in the Kavango Basin will be devastating from a water security and climate change perspective and will constitute a significant violation of human rights - both to affected residents in Namibia and Botswana, the Southern African region and the entire human species**. We have to transition away from fossil fuels to avoid an ongoing rise in global greenhouse gas emissions and climate change. Canada cannot responsibly honour its commitment to the Paris agreement whilst allowing Recon Africa to explore for gas in Kavango? Please acknowledge receipt of my submission. Thankyou Margie Pretorius Chairperson - Sustaining the Wild Coast www.swc.org.za	No written was issued. The Draft Scoping Report provided all the information. The EIA and EMP reports that addressed all the key concerns raised by the stakeholder was not yet ready at the time of the submission. The issues raised have been addressed in the EIA and EMP Reports. Please refer to the relevant Chapter of the Reports as indicated.	EIA and EMP Reports and Annexes

11.6	**From:** earthl@iway.na <earthl@iway.na> **Sent:** Thursday, 28 January 2021 12:34 PM **To:** Sindila Mwiya, Dr <smwiya@rbs.com.na>; frontdesk@rbs.com.na **Cc:** Timoteus Mufeti <Timoteus.Mufeti@meft.gov.na>; Percy Misika <ED@mawf.gov.na>; ReconAfrica <admin@reconafrica.com>; Bertchen Kohrs <earthl@iway.na> **Subject:** Comments_Earthlife Namibia_Draft Environmental Scoping Report for the Proposed 2D Seismic Survey by ReconAfrica **Importance:** High Dear Dr Sindila Mwiya, Attached please find comments from Earthlife Namibia on the Draft Scoping Report for the Proposed 2D Seismic Survey. Kind regards, Bertchen Kohrs Earthlife Namibia Mobile: 081 2938085	The issues raised by the stakeholders have been addressed in the EIA and EMP Reports. Please refer to the relevant Chapter of the Reports as indicated.	EIA and EMP Reports and Annexes
11.7	**From:** Jan Arkert <jan@africaexposed.co.za> **Sent:** Thursday, 28 January 2021 3:25 PM **To:** 'Dr Sindila MWIYA' <frontdesk@rbs.com.na> **Cc:** timoteus.mufeti@met.gov.na **Subject:** 2D Seismic Survey Draft Scoping Report Submission **Importance:** High Dear Dr. Mwiya I have attached a copy of my submission with comments and objections to the proposed 2D Seiesmic Survey in Kavango Namibia. I trust that you will peruse my report and consider the comments and objections that I have included. Please acknowledge receipt of this email. Regards **Jan Arkert** Pr.Sci.Nat C: 083 656-0900 F: 086 633-7332	The issues raised by the stakeholders have been addressed in the EIA and EMP Reports. Please refer to the relevant Chapter of the Reports as indicated.	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken
11.8	**From:** John Grobler <john.grobler@icloud.com> **Sent:** Thursday, 28 January 2021 3:58 PM **To:** frontdesk@rbs.com.na; timoteus.mufeti@meft.gov.na **Subject:** ReconAfrica EIA program Dear Dr Mwiya		

	As you likely know from ReconAfrica's Community Coordinator Mr Alois Gende, I spent a few days in the Kavango East after attending your presentation at the AMTA offices in Rundu last Friday. I need to bring a few matters to your official attention: 1. The waste pond at the Kawe drill site is not lined - see attached picture. - Does this not pose a potential threat to the aquifer, which is very porous? - Does this conform with standard practises in Canada and Namibia? - Was ReconAfrica issued with a water use permit for their Kawe site yet? 2. ReconAfrica's drill site at Kawe was constructed on a part of Mr Andreas Hawano's mahangu field. I confirmed with the local headman Daniel Haufiku that Mr Hawano had been farming that place since 2014, but neither Mr Hawano or Mr Haufiku were consulted or even informed in advance of ReconAfrica's occupation of part of his farm and constructing their drill site right next to Mr Hawano's homestead. A similar situation also prevails at Mbambi, where ReconAfrica occupied land allocated to Mr Andreas Sinonge by the late headman Fulayi Kalenga Mbwenge under authority of late Hompa Maria Mwengere. The Kavango Land Board also was not aware of ReconAfrica's impending arrival and occupation of communal land, according to their current chairman. - Is this not a serious violation of the Communal Land Reform Act (Act 5 of 2002) provisions to protect security of tenure and prevent illegal evictions? - Has ReconAfrica consulted with anyone at the Land Board on their plans? - Who signed these agreements that ReconAfrica claim to have for their three drill target sites and under whose authority were these agreements entered into? 3. RBS was to hold community meetings to inform the people of the seismic program. At the presentation last Friday, you stated that the people were working their fields during the day and that they would indicate when the meetings would take place. Mr Gende however is the person who informs the communities of when the RBS meetings are to take place. In spite of this, RBS and ReconAfrica kept the Mbambi community waiting for three hours last Saturday before Mr Gende arrived to inform them the meeting was cancelled because of a dispute over ReconAfrica's sub-contractors using gravel from the quarry at Mbambi Mabure. The community meeting scheduled for Monday at Nçamagoro was also similarly cancelled, and the meeting at Nçaute also did not take place, I am informed from my contacts in those places. - Which of the community meetings did now actually take place? - By failing to attend the Mbambi community meeting - and cancelling the meetings at Nçamagoro and Nçaute - does this not constitute a major failing in the EIA process in respect of local consultations? 4. In the Rundu meeting to discuss the seismic testing program, no mention was made of the potential risk of such testing causing damage to local people's huts and boreholes, should the seismic rig have to be operated in close proximity of either.	Most of the issues raised falls outside the scope of work for the proposed 2D seismic survey operations. Issues relevant to the proposed 2D seismic survey raised by the stakeholder have been addressed in the EIA and EMP Reports. Please refer to the relevant Chapter of the Reports as indicated. The questions were forwarded to ReconAfrica to be addressed as may be applicable and relevant to the current scope of work.	

	- Why was this risk not explicitly mentioned at the meeting, and are the people being appraised of this risk at all at the community meetings (insofar as those had happened)? I am looking forward to hearing from you and trust you will add this to the EIA record, of course. Yours, etc John Grobler John Grobler Journalist Windhoek, Namibia +264 81 240 15 87 john.grobler@icloud.com 		
11.9	**From:** Liz Hosken <liz@gaianet.org> **Sent:** Thursday, 28 January 2021 9:57 PM **To:** frontdesk@rbs.com.na; Commissioner <Teofilus.Nghitila@met.gov.na>; Environmental Commissioner <timoteus.mufeti@met.gov.na> **Subject:** Submission: ReconAfrica Seismic EIA Scoping Report Dear Mr Mufeti and Dr Mwiya, I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL licence 73 in northeast of Namibia. I am sending the attached letter to formally register my concerns about ReconAfrica's application for an Environmental Clearance Certificate to conduct seismic testing. I kindly request for you to acknowledge receipt of this email and the attached letter. Thank you. Yours sincerely, Liz Hosken The Gaia Foundation	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	
11.10	**From:** Andy Gheorghiu <andy.gheorghiu@mail.de> **Sent:** Thursday, 28 January 2021 10:35 PM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na **Cc:** marvinconsultants@outlook.com; Teofilus.Nghitila@met.gov.na **Subject:** Registered stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73 Dear Dr. Sindila Mwiya, as a confirmed and registered stakeholder, I herewith contribute to the submission process.		

	Please find my submission attached. It would be nice if you could confirm receipt. However, I have noted Recon's proposed public meetings to be held in Windhoek on Tuesday 2nd February (ie after the deadline for written submissions). I personally was also denied access to local consulations via livestream. Apart from that, I reckon that - due to CoVid restrictions - consultations couldn't have taken place in a manner that would have allowed access and participation on a much larger scale for interested and affected parties. I therefore also ask for the deadline for written submissions and public consultations to be extended until CoVid restrictions have been lifted. Please don't hesitate to get back to me with any question that might occur. My best regards Andy Gheorghiu -- **Andy Gheorghiu Consulting** Campaigner & Consultant for climate/environmental protection, energy policy & further development of democratic processes Stechbahn 9 34497 Korbach Germny **Phone: +49 5631 50 69 507** **Mobile: +49 160 20 30 974** **Twitter: @GheorghiuAndy** **Skype: andy.gheorghiu2**	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes
11.11	**From:** Jane Mennigke <jmennigke@shaw.ca> **Sent:** Friday, 29 January 2021 10:18 AM **To:** smwiya@rbs.com.na; frontdesk@rbs.com.na **Subject:** I am writing to register my objection to exploratory drilling by Recon Africa in Namibia.docx Greetings. I am writing to register my objection to exploratory drilling by Recon Africa in Namibia. 1. There has been insufficient information given to local communities that are going to be impacted by the drilling, and by the proposed extraction which will follow initial set up and exploration. The United Nations Declaration of the Rights of Indigenous Peoples, the right to free, prior and informed decision has in this case not been met.	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	

	I am a South African citizen, and I have lived for three years in a Canadian town where fracking for oil and gas extraction was the main source of employment. So I believe my experience of working with seniors in poverty in the community, who had lived in the town for 30 years or more, gives me an understanding of the after effects of resource extraction and its devastating consequences to the environment and to the community. This I could see with my own eyes in the large chemical run off in tailings ponds, the size of lakes, with toxic sludge, the poisoning of groundwater, and the indigenous communities battered by the influx of itinerant workers, and the boomtown, casinos, drug trafficking and exploitation of local women in prostitution. Not all indigenous communities will have the necessary training to be employed by the mining sector, and so instead of using this highly valued land resource and developing other skills to boost a tourism industry with sustainable industry and productivity, corporations will take over this area and only very few will benefit. Local communities will lose their ability to control their own environment. The consequences of this endeavor, are lamentable. Other avenues should be taken to boost revenue in this region, and full consultation should be done with local communities at every level. 2. Sensitivity in the region to water scarcity. Water in this region is already scarce. It cannot be denied that fracking on any scale will pose a great risk to groundwater sources. Fracking fluids containing water are mixed with chemical additives and pumped into wells to the level of the hydrocarbon bearing rock, this is then heated which causes the fracturing of the rock, and numerous small fissures. This process will pollute wetlands in the rainy season, and affect limited water resources in water scarce areas as well as create greenhouse gas emissions. It will be devastating to wildlife and to Indigenous communities who will carry the burden of this if it is imposed on them by government and big corporations. Please acknowledge receipt of my submission. Thank you Jane Mennigke jmennigke@shaw.ca (1) 6048183507		EIA and EMP Reports and Annexes and provided
11.12	**From:** Tanya-African Bush Bird Tours cc <info@bushbird.com> **Sent:** Friday, 29 January 2021 11:06 AM **To:** frontdesk@rbs.com.na; smwiya@rbs.com.na; admin@reconafrica.com **Subject:** ReconAfrica Dear Sir, Dear Madam, With this letter, I would like to express my absolute highest concerns and VETO with the oil and gas drilling in the Kavango Basin / Kavango-Zambezi Transfrontier Conservation Area and many other conservancies and wildlife reserves. This prospect area also includes the UNESCO World Heritage Site of Tsalido Hills. This is taking place in a protected nature area – many livelihoods are at stake here and those of many animals, especially elephants. To that, the seismic testing harms the animals a lot, as they are very sensitive to these frequencies. I am convinced, that these testing are liked with the many elephants deaths in that area. ReconAfrican is a unethical company, I would like to raise may voice! This exploration must be stopped by our government, to protect the Namibia's and also the wildlife, Namibia as to offer.	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes and provided

	Please be so kind as to the EIA to me. **Mit freundlichen Grüßen / Kind regards** **Tanya Förtsch** African Bush Bird Tours cc/2004/2355 P / Bag 13100 Windhoek 10001 Namibia Tel: +264-61-256848 Cell: +264-81-889 9199		
11.13	From: Jeffrey Barbee <jeffrey.barbee@gmail.com> Sent: Friday, 29 January 2021 11:19 AM To: frontdesk@rbs.com.na; timoteus.mufeti@met.gov.na; elly.hamunyela@met.gov.na Subject: Dear Mr. Mwiya REF Submission: Seismic survey comments ATTN: For the EAP for the ReconAfrica Seismic Survey EIA Scoping Report. I am registered as an interested and affected party for this seismic survey. I have a background in oil and gas development from working offshore of Angola in oil exploration, as well as working as the climate reporting fellow for the Open Society in 2010 to 2012, and then again following the global oil and gas business as the Director of the award winning film The High Cost of Cheap Gas. I am also the writer of the series about this current development for National Geographic. After reading the scoping report for the seismic survey I am struck by three very important facts that should be included in any further EIA to come and in any ongoing investigation into the current drilling program.. 1) Baseline water studies of every well within a kilometer of the seismic lines appear to not be called for or done. There is ample evidence from around the world to suggest that seismic surveying can disrupt underground aquifers, especially in soft sand. Before this testing is allowed to go forward, it is imperative to do water testing at every borehole and well along the 450km route that the drop weight trucks would go. To that end please provide me with any water studies that the EAP has done or commissioned to have done both for this EIA and the previous one for the Stratigraphic wells in PEL73. 2) I am concerned that only 15% of all the people living in the two regions of Kavango have access to the internet regularly as per this study: https://beta.documentcloud.org/documents/20464488-statistics-namibia-nids_2016#document/p66/a2013739 How are people who will be impacted by these developments supposed to register or get informed about something that could affect them for the rest of their lives? Real consultations in person should take place, and by only allowing people to participate through electronic means that they don't possess the EAP is preventing real public participation. The Environmental Management Act is clear that people must be informed of anything that could impact them and impinge upon their rights granted through article 95 of the constitution, and your means of communication disenfranchises the majority of people who have a right to know about this potentially dangerous activity. To that end I officially request a copy of the list of interested and affected parties to the first EIA for ReconAfrica's stratigraphic wells, as well as the one for this EIA, including all written comments from the IAPs for both projects. 3) In the communication to me, the EAP has suggested that fracking is a fantasy, suggested I buy stock in the company, and has promoted this project both in the scoping report and in his personal emails. This is against the published regulations.	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	According to page 9, regulation 4b in the published EIA regulations in the Government Gazette of 2012: An EAP must "perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;" It is clear from the scoping report, which reads like a piece of advertising for ReconAfrica that the EAP has not carried out this fundamental duty and should be removed, the Environmental Clearance Certificate should be revoked for the current drilling program and a full investigation of his actions for this and the previous EIA should be launched. A new strategic environmental assessment is clearly needed that takes in the entirety of this project in line with international best practice. Thank you for your time and attention, Jeffrey Barbee		
11.14	**From:** Rachael Harlech-Jones <rachael@visitnamibia.net> **Sent:** Friday, 29 January 2021 11:36 AM **To:** Teofilus.Nghitila@met.gov.na **Cc:** frontdesk@rbs.com.na **Subject:** ReconAfrica's Seismic EIA Scoping Report Dear Mr. Mufeti (Environmental Commissioner) and Dr. Mwiya (Environmental Assessment Practitioner) I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. This is a letter to formally register very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I am concerned about numerous conservation factors connected to this project. However, a more immediate concern is the fact that today, 29 Jan 2021, is the final date for the public to register their comments/objections and yet ReconAfrica have arranged meetings through NCE for 2 Feb. How do these meetings have any validity if they are being held after the EIA application cut-off date? It makes a mockery of the entire process. regards Rachael Harlech-Jones	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	
11.15	**From:** Kate Davies <kate@safcei.org.za> **Sent:** Friday, 29 January 2021 12:33 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 I A P: Katherine Claire Davies Mobile: +27 834681798 Liaison officer SAFCEI Southern African Faith Communities Environment Institute. To whom it may concern: Comments on the proposed seismic survey, leading to fossil fuel extraction in the Kavango basin. There is NO justification for the proposed exploration. We all know that there is a global climate crisis. Any future development and exploration of fossil fuel extraction processes is short sighted and madness in terms of the long term well-being of future generations and survival on the planet. This is the bottom line. This project will have short term financial gains for 'early bird' investors, but will leave late comers with stranded assets and Botswana and Namibia a legacy of broken promises, desolation and destruction for future generations to deal with. The region is one of exceptional and unique beauty and isolation, parts of which have been identified as UNESCO world heritage sites, with enormous and long term ecotourism potential. It is arrogant and outrageous that a Canadian company	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes and provided especially Annex 2 Fauna and Flora

	can even consider undertaking such a project in a natural sanctuary of such global significance. Is there no place that is sacrosanct from human avarice and greed? The promise of job creation is a distraction from the truth. Jobs will be short lived with little long-term benefit In a water scarce subcontinent, to contemplate the extraction of fossil fuels is outrageous. Indigenous peoples and the other than human community of life have adapted to living sustainably in the region over eons. In a few decades this will be destroyed forever. To steal the subterranean water if the Kavango basin for climate changing oil and gas extraction is unethical and outrageous. There is no valid argument for this project to proceed. The Kavango region and her people must be protected from greedy, profit seeking foreign companies. Companies that will take advantage of less resistance from unsuspecting people in Africa than they would get from climate and environmental activists in their own countries. Should this project proceed, there will be a global outcry. Katherine Davies 29 January 2021		
11.16	**From:** Jessica Lavelle <jessicajanelavelle@gmail.com> **Sent:** Friday, 29 January 2021 2:50 PM **To:** Teofilus.Nghitila@met.gov.na; frontdesk@rbs.com.na **Subject:** ReconAfrica's Seismic EIA Scoping Report Dear Mr. Mufeti and Dr. Mwiya, I have registered as an Interested and Affected Party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. With this letter I would like to formally register concerns regarding the application for an Environmental Clearance Certificate to conduct seismic testing and request an acknowledgement of receipt of this letter. The nature of my concerns are as follows: 1) **Inadequate and exclusionary consultation processes** due to COVID-19 placing severe restrictions on stakeholder meetings and travel; an unwillingness of the Environmental Assessment Practitioner to live-stream public consultations for people to attend safely; and the use of online submissions only for the registration of Interested and Affected Parties. This, despite the communities most affected by ReconAfrica's proposed seismic activities not having access to electricity or internet. There are more than six hundred communal farms and many more communities where there is no internet access at all inside the license area. **This exclusion is in breach of the communities' legally mandated right of full disclosure of the impact of such activities on their lives and livelihoods and their right to raise concerns regarding such impacts.** I request that the application of an ECC is put on hold until comprehensive consultations can take place. 2) The Scoping Report provides **insufficient data regarding the impact on high-value trees** including Zambezi teak and rosewood as a result of road widening. Table 3.2 (pg 80) of the scoping report says that, "No removal of protected species or mature trees are anticipated because the activity will require widening the existing tracks as may be applicable." This is a contradictory statement as road widening does require the removal of trees and not anticipating removal does not qualify as a commitment to protecting high-value trees and associated species including insects and birds. The photo of Line EW5 on	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	Plate 1.24 (pg 37) of the Scoping Report indicates that trees will be removed to accommodate the widening of roads. Further, **long-term implications of increased road networks have not been adequately addressed** in the Scoping Report including increased poaching and illegal harvesting of plants. I request that this ECC is put on hold until proper scientific studies on these impacts can be done. 3) Globally there is a call for the phasing out of fossil fuels due to their detrimental effect on the environment and their contribution to Anthropogenic climate change. Namibia is blessed with immense solar energy that is more than sufficient to fulfill the population's energy requirements. Not only is solar energy infrastructure faster and cheaper to install (approximately five months), it is cheaper to maintain and has minimal effect on the environment. **According to the Act, alternative energy systems must be explored in the EIA, which has not been done**, either in this Scoping Report or the first one for the exploration drilling, a major error on the part of the EAP. I trust you will take my concerns into serious consideration. A project of this scale is not to be undertaken without the necessary due diligence. Recent events in the Juukan Gorge, Australia by Rio Tinto have explicitly shown that mining companies do not obtain Free, Prior and Informed Consent, do not adequately address the concerns of local communities and there is a dire need to improve governance processes to include indigenous peoples and local communities in authoritative decision-making processes. I sincerely hope that the issues I have raised are taken into account with the correct engagement, science and outreach at a time that enables all affected parties to participate without the threat of COVID-19. It seems improbable that people in the region could possibly make an informed decision about what ReconAfrica is calling “the largest oil discovery of the decade” without a multi-year engagement process that examines this project as whole: a massive oil and gas development that needs to be carefully looked at before any other environmental clearance is issued. Regards, Jessica Lavelle Registered Interested and Affected Party Address: Kob Cottage, 12 Harris Road, Kalk Bay, South Africa, 7975 Phone number (if known): +27 72 198 8687 -- Jessica-Jane Lavelle Postdoctoral Research Fellow DSI/NRF SARChI: Environmental and Social Dimensions of the Bio-economy Department of Environmental and Geographical Science University of Cape Town Cape Town (//Hui !Gaeb) +27 (0) 72 198 8687 jessicajanelavelle@gmail.com www.bio-economy.org.za www.voices4biojustice.org		

11.17	**From:** nndfn@africaonline.com.na <nndfn@africaonline.com.na> **Sent:** Friday, 29 January 2021 3:23 PM **To:** timoteus.mufeti@met.gov.na; frontdesk@rbs.com.na **Cc:** Ben Begbie-Clench <benbegbie@gmail.com> **Subject:** ReconAfrica's Seismic EIA Scoping - Letter NNDFN Please find attached letter for your consideration. With best wishes, Saskia Sheehama Director NNDFN	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	
11.19	**From:** Geoff Davies <geoff.davies@safcei.org.za> **Sent:** Friday, 29 January 2021 3:24 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Thank you for confirming my registration as a stakeholder. My full name is: Geoffrey Francis Davies. My mobile number: +27837545275 My organization is: the Southern African Faith Communities' Environment Institute (SAFCEI) I write in principle from the perspective of the natural environment and our responsibility to care for it. In particular I write as a bishop in the global Anglican communion. We know that we have been commanded by God to look after, care for and protect this incredible creation of life on this planet. We write to object in principle to Exploration on environmental grounds, knowing that we are answerable to God. First, on local environmental grounds. The whole of the Okavango Area is uniquely valuable and sacred in its geological formations, its wildlife and the habitat which is provided for the people of that region. There are few wilderness areas remaining in the world. Once damaged, they are gone for ever. We have to look to the heritage we leave to our children and not base our decisions on money that can be made now. Secondly, on global grounds, we know that climate change is threatening the well-being of future life on this planet. To counter global warming, we know we have to stop burning fossil fuels, whether it be oil, gas or coal. It is therefore highly irresponsible to even explore for further fossil fuel resources. All financial resources should be directed to developing renewable energy. Spending financial resources on exploration for fossil fuel is sheer irresponsibility. Pope Francis, The ecumenical patriarch of the Orthodox church and most mainline Christian churches including the Lutheran Church have declared that to destroy the natural environment and God's creation is a sin. We therefore call upon ReconAfrica to cease this activity, which is clearly sinful, forthwith. Bishop Geoffrey Davies Geoff Davies, The Green Bishop, SAFCEI	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	

	From: John Hazam <jh@nnf.org.na> **Sent:** Friday, 29 January 2021 4:44 PM **To:** smwiya@rbs.com.na **Subject:** Some Comments on Proposed 2D Seismic Survey in Kavango Regions from NNF	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes
11.19	**From:** Divina Naidoo <NaidooD@Schindlers.co.za> **Sent:** Friday, 29 January 2021 6:50 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na>; Anja van Wijk <vanwijk@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za>; timoteus.mufeti@met.gov.na; ceo@n-c-e.org; Nicole Rens <Rens@Schindlers.co.za> **Subject:** RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 **Importance:** High Dear Dr. Mwiya, The above, together with our correspondence, below, refer. Kindly find attached hereto our submissions in relation to the Proposed 2D Seismic Survey Over AOI in PEL 73. We welcome your further commentary and engagement in regard to same. Best regards, Divina **From:** Divina Naidoo **Sent:** 28 January 2021 22:35 **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Sindila Mwiya <smwiya@rbs.com.na>; Anja van Wijk <vanwijk@Schindlers.co.za>; Nicole Rens <Rens@Schindlers.co.za>; Marc Gevers <gevers@schindlers.co.za>; Danisha Naidu <naidu@schindlers.co.za>; Lesai Seema <seema@schindlers.co.za> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya, Noted - with thanks. Best regards, Divina	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken
11.20	**From:** klaus <klaus@coachplan.co.za> **Sent:** Friday, 29 January 2021 7:34 PM **To:** smwiya@rbs.com.na **Cc:** Carl.Schlettwein@mawlr.gov.na; Esau.Mbako@mawlr.gov.na **Subject:** RecondAfrica Oil and gas Prospecting in Namibia - Comments and EIA shortfalls - Interested and Effeted Party **Importance:** High RBS cc Risk Based Solutions - Windhoek / Namibia Attention : Dr. Sindila Mwiya ; cc Minister of Water Affairs		

	RE ; Oil and Gas exploration by RecondAfrica – Licence PEL 073 – Kavango Area Aggrieved and opposed to the oil and gas industry : The bad news of an oil and gas exploration company in North East Namibia should be investigated and properly explained with the many shortages to their present developments and activities . They have obtained a prospecting licence in 2014/2915 from the Ministry of Mines . This without any pre consultations and discussions with the tribal leadership nor the local population affected, and no EIA done of the proposed prospecting areas . Some locals have heard about an oil company to operate in their region only about 2 months ago . The complete non transparency how the licences PEL 073 was obtained , by whom and under which conditions and costs must be investigated . That start in Namibia of RecondAfrica is very suspicious of the completion of all required formalities , and public notices as required by law. Why the total silence from RenondAfrica and the Namibia Government ,(who hold a 10% share in the company) , over the past 5 years.? Was the application made known through the Government Gazette in 2015 ? Were press releases made.? Which Minister approved this prospecting licence ? Was the Govt. Cabinet involved in the process ? Why was a permit granted in an important Conservation area , that is shared by 5 Nations - Angola , Namibia , Botswana , Zimbabwe and Zambia. The KAZA - TFCP - Kavango Zambezi - Trans Frontier Conservation Parks.? Why is such a bad polluting and environmental damaging Industry allowed , and handed an exploration licence. ? Now after 5 years of silence by RecondAfrica they state that they have that permit for the next 25 years ? Did they on this prospecting Licence application explain that “fracking”will be used to gain production efficiencies ? The above points specifically need to be addressed by the aurthorities and answer to the public , to prove that this prospecting Permit PEL 073 was obtained correctly , and complies to all rules and legal regulations required. **Water is Life !!** Namibia is an environmentally hard and beautiful country, that is very dependent on natural water supply and seasonal rains. There are times with severe droughts and water shortages , forcing the environment and local population to survive in sometimes very difficult times. Therefore no industry such as oil and gas production should be allowed where water supply is in short supply. The pollution factor is to great , and the amount of water consumed by the prospecting and production will deplete fresh water and underground water supplies. The dangers of poisoning by “ fracking “ is very real , resulting in waterways in the Swamps and wetlands to die and disappear. **Water is Life !!!** This industry is “environmentally a suicide”, and to consider allowing the oil and gas production anywhere near or in the area of these environmental delicate areas is unbelievable . The company RecondAfrica is so desperate to push production with this poisonous hydraulic “fracking “ that they have placed top “Fracking “ officials in charge for the local Namibia exploration. It is well known how the “fracking “adversely has affected areas in the USA , poisoning fresh water supply and also groundwater , rivers and streams, and polluted the air with poisoned gases. The Canadians can stay at home with these environment destructive and poisoning industries. Do your “fracking “ and oil production at home in Canada.	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes

	RecondAfrica , don't rob the Namibians of their valuable and beautiful natural assets , such as wild life , biodiversity and conservation areas and valuable tourism parks and areas , in order to enrich yourselves as fast as possible with dirty oil sales ! All this to the expense of the country Namibia and the people of Namibia. Theodore Rooseveld said : Support Conservation ; " The Wildlife and its inhabitants cannot speak --- So we must and we will " . ! The pollution effects are the threat of existence of wild life species , Fauna and Flora , and total loss of biodiversity and conservation. These most important wetlands of the Okavango , are well known worldwide , and as such are treasured by both Namibia and Botswana. This invasion of a dirty oil and gas industry is threatening the existence of the huge natural wild life wetland areas . The attitude of this foreign Canadian company is arrogant and very bad. They have no respect for human rights and local life . An example is the San bushmen tribe living the area of Tsodilo Hills . These San sacred and holy grounds around the hills , are part of a UNESCO World Heritage Site . The whole area is now affected by this pollutant oil and gas prospecting industry. RecondAfrica took no notice of that when applying for the prospecting licence. They disregarded the human tribes that has lived in these areas for thousands of years. The San are so accustomed to their way of life in the bush as hunter gatherers, and now their future is threatened. They have not been consulted at all , and are frightened of their future. This is absolute disgusting that these money greedy foreigners don't give a dam towards the local tribes and communities , that are effected now and in future with this oil prospecting and production. The climate change factors and air pollution , are vastly affected by these oil and gas prospecting and productions. The world is moving towards saving our planet , with clean air for the survival of mankind , biodiversity and environment. This outdated " Fracking "method of obtaining cheap oil and gas at the expense of the environment and the local population and their way of life living on mother earth , should be respected and honoured. This is not done by RecondAfrika at all. The established position by the World Heritage Committee that mineral ,oil and gas explorations or developments is **incompatible** with World Heritage status . This is also for Conservation areas. IPIECA further states that this position is an important consideration for companies when assessing opportunities in or near World Heritage Sites. The ICIMM , representing the leading mining companies in the world together with the oil companies Shell made a landmark " No Go Commitment " not to explore or exploit for oil ,gas or minerals in and around World Heritage properties. Since 2013 , more companies made commitments , Total , Tullow , Soco and more to follow. The solution is therefore that RecondAfrika as a junior beginner , must undertake also this " No Go Commitment " , by handing in their prospecting Licences and fold up the Oil Rig and leave Namibia and Botswana. It is the duty of the Government to act and protect all the people of Namibia , and the beautiful environments and wetlands of Namibia. Klaus Gastrow - Individual – 29/1/2021 -- 18:25 klaus@coachplan.co.za		

	From: Silke Ahrens <silkeahrens@hotmail.com> **Sent:** Friday, 29 January 2021 8:57 PM **To:** smwiya@rbs.com.na **Cc:** frontdesk@rbs.com.na; savetheokavangodelta@gmail.com **Subject:** IAP Registration; Submission of Objection to the proposed application for ECC, ReconAfrica-related activities in KavangoBasin and affected areas Dear Dr Mwiya and Team of RBS, please find attached my submission of : The request of IAP registration on this topic The submission of my questions and request for further research in the matter of all current ECCs, drafted applications of PEL No 73, Kavango Bason The submission of my concerns re 2D Seismic Survey process and exploratory drilling and all related activities as stated in the first submitted report of Dr Mweya and RBS on this matter. Thank you very much for your kind attention. Silke Ahrens Windhoek Namibia	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes
11.21	**From:** Annette Hubschle <Annette.Hubschle@uct.ac.za> **Sent:** Friday, 29 January 2021 10:57 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; Teofilus.Nghitila@met.gov.na **Cc:** savetheokavango@gmail.com **Subject:** Registered stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73 Dear Sirs Please find attached my written submission regarding ReconAfrica's proposed 2D Seismic Survey in PEL 73. Kind regards Annette Hübschle **Dr Annette Hübschle** Global Risk Governance Programme Faculty of Law University of Cape Town Email: a.hubschle@uct.ac.za | Mobile: +27 (0) 73 171 2841 | LinkedIn | Twitter | Academia | Researchgate	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	From: Okavango Delta <savetheokavango@gmail.com> Sent: Friday, 29 January 2021 11:45 PM To: Sindila Mwiya <smwiya@rbs.com.na>; Dr Sindila MWIYA <frontdesk@rbs.com.na>; Teofilus.Nghitila@met.gov.na Cc: savetheokavango@gmail.com; josephineamwaalwa@gmail.com; veruschka0107@gmail.com Subject: Registered stakeholder submission in relation to proposed 2D Seismic Survey Operation in PEL 73 Dear Dr Mwiya and Commissioner Nghitila As a registered IAP, Frack Free Namibia & Botswana hereby wishes to submit our objection to the planned seismic survey by Recon Africa. Ms Verushka Dumeni (mobile number 0814680571) and Ms Josephine Amwaalwa (0816682995) are our contact persons. Kind regards Frack Free Namibia & Botswana	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	
11.22	**From:** Marilyn Lilley <marilyn@rsaweb.co.za> **Sent:** Saturday, 30 January 2021 12:04 AM **To:** Teofilus.Nghitila@met.gov.na; frontdesk@rbs.com.na; smwiya@rbs.com.na **Cc:** 'marilyn' <marilyn@rsaweb.co.za> **Subject:** comments - Proposed 2D Seismic Survey Operation in PEL 73 Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya Environmental Assessment Practitioner (EAP). REF ReconAfrica's Seismic EIA Scoping Report. I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. Please reply with A WRITTEN ACKNOWLEDGEMENT OF RECEIPT This is a letter to formally register my very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I believe that the Public Participation is flawed – I believe that it is not a fair and reasonable PPProcess and for several reasons I believe that it should be completely redone. • A Problematic comment period • The notice period was sent out during a holiday period • only 17 working days were given to the public to research and understand a very complex topic and many complex related issues. Two full extra weeks should be given for comments. • The notice was sent out during a holiday period when it is known that many people are not able to spend time researching a complex topic like this and sending comments • Only one notice appeared in a public newspaper instead of in two newspapers • Notices were not put up in the affected areas for the local communities to be informed of the proposed seismic survey and to register as I&AP's • They were not given the opportunity to inform themselves about seismic surveying . • Many people do not have the ability to send emails to register and to comment. Yours sincerely Interested and affected party Marilyn Lilley Cape Town South Africa	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken
11.23	**From:** Oliver Freyer <olifreyer@outlook.com> **Sent:** Saturday, 30 January 2021 12:32 AM **To:** frontdesk@rbs.com.na; Timoteus.Mufeti@met.gov.na **Subject:** ReconAfrica's Seismic EIA Scoping Report	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the	

	Dear Mr. Mufeti, Dear Dr. Mwiya **Re: ReconAfrica's Seismic EIA Scoping Report** As a registered Interested and Affected Party for the proposed seismic survey operations conducted in PEL 73 in northeastern Namibia, I would formally like to submit my concerns in the attached letter. It would be much appreciated if you consider them. I kindly ask for an acknowledgement of receipt. Sincerely, Oliver Freyer	relevant annexes on flora, fauna, public, stakeholders and community consultation processes	
11.24	**From:** Anja Plessis <anja.dup2@gmail.com> **Sent:** Tuesday, 2 February 2021 1:18 PM **To:** Teofilus.Nghitila@met.gov.na; frontdesk@rbs.com.na **Subject:** REF ReconAfrica's Seismic EIA Scoping Report. Dear Mr. Mufeti, Environmental Commissioner and Dr. Mwiya Environmental Assessment Practitioner (EAP). Please see my previous email on the issue, and note that I have registered as an interested and affected party to the application by ReconAfrica to conduct seismic testing in their PEL license 73 in the northeast of Namibia. This is a letter to formally register my very serious concerns about the application for an Environmental Clearance Certificate to conduct seismic testing. I am concerned to hear that while it states on Page 80 Table 3.2 of the scoping report says that "No removal of protected species or mature trees are anticipated because the activity will require the widening the existing tracks as may be applicable." This is concerning considering, as I am sure you are aware, there are a number of protected species in the license area. This plan to run huge teams of trucks hundreds of kilometres through deep bush in a protected wilderness area will obviously do huge amounts of damage. This is obvious from the photo of Line EW5 on Plate 1.24 on page 37 of the Scoping Report, where hundreds if not thousands of trees will have to clear hundreds of kilometres to widen the road for the huge trucks. I could not find any studies on whether nesting birds will be killed, what kind of plants will have to be destroyed and where, or what indigenous trees might be killed. This is especially distressing as most of the tracks they want to use are in the bed of the Omatako river, meaning this activity would definitely fall within 100 meters of a watercourse, see Plate 1.21 page 34, where the line is right next to the riverbed. It is clear to me that this rushed scoping report, which is designed to eliminate the need for environmental oversight like the Forestry Act, 12 of 2001 and The Nature Conservation Ordinance 4, 1975. What are the long-term implications of these new wide roads on poaching? On illegal plant harvesting? The EAP doesn't include any data about this at all! Due to this, we ask you to set aside this ECC request until proper scientific studies on these impacts can be done. In Texas, 142 homes were damaged by seismic testing like the sort ReconAfrica wants to carry out along the settled roads of Kavango East and West. Many hundreds of homes, many made from mud or light brick and concrete, are within a hundred meters of the roads that ReconAfrica wants to shoot their seismic test lines on. Serious home damage, not to mention harm to human beings, may occur and the EAP has not mentioned anything about this in the draft Scoping Report, an egregious error that should be rectified in the EIA and again, necessitates a strategic environmental assessment in order to understand the full effects of this operation on the people and the environment of Namibia. I find it EXTREMELY concerning that there is absolutely no mention of or investigation into the effects of seismic testing on shallow water wells in the region. Hundreds of small communities line the roads that ReconAfrica wants to shoot seismic lines on with huge Adjusted Drop Weight method "thumper" trucks. There should be a full study of the effect of these seismic testing trucks on shallow water wells next to the roads used by the survey. According to the Canadian province of New Brunswick's Conservation Council, seismic testing can damage the wells people get their drinking water from, and has led to the loss of water in at least 60 homes there. They say that only by doing baseline (before-seismic) water testing at	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	every well location, then doing it after the seismic testing can any possible damage or pollution from the activity be understood. There does not appear to be any plan to do any baseline water tests at all and no possible impacts of the testing on water wells appear to be considered. It seems highly improbable that people in the region could possibly make an informed decision about what ReconAfrica is calling “the largest oil discovery of the decade” without a multi-year engagement process that examines this project as a whole. I hope you consider these points carefully, as overlooking them may prove catastrophic. Sincerely, Anja du Plessis		
11.25	**From:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Sent:** Monday, 1 February 2021 5:59 PM **To:** 'mwanyengwa@ReconAfrica.com' <mwanyengwa@ReconAfrica.com> **Subject:** Max Muyemburuko Push Back **Importance:** High Below are the questions and answers I provided to Max just for your information. The journalist decided to cherry pick the answers without the full question or answers provided. A good example is the question 4 and answer where I used the word stupidity for him saying that it is unacceptable to plan to run huge trucks 450km through deep bush, widening roads as we go and yet he had the scoping reports with clear roads shown that will be used for this survey. Many thanks, Sindila …….. **From:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Sent:** Tuesday, 26 January 2021 6:47 AM **To:** 'Max Muyemburuko' <max.muyemburuko@gmail.com> **Cc:** 'marvinconsultants@outlook.com' <marvinconsultants@outlook.com> **Subject:** RE: Questions **Importance:** High Dear Max, Please see my responses to your question in red below. Please note that I hold a PhD and you can call me Sindila but cannot refer to me as Mr Mwiya in case you did not know the difference. I know how much you respect foreigners and nonindigenous people in your circles, but do not forget that even the rural people of Kavango West and East that you think need support from your foreign experts have far much great knowledge and insight about their area than a foreigner and nonindigenous person will ever learn or claim to know about the local areas. Leaner to respect your own people first and their great wisdom in local knowledge, in the same way they are respecting you. It is so disheartening for you to think that local people of Kavango West and East cannot decide on what is best for their areas or regions. Yes, I know that on Social Media you have been behaving as if you are the spokesperson for the Office of the Environmental Commissioner or MEFT to which you are not, while at the same time you are offering foreign international media companies and Interested parties (foreigners) for translations and guiding them around the project area with your fees quoted in USD as per your recent previous quotation. Just like the other many so called non-profits that have emerged and are now using the project, the Okavango River, the Okavango Delta, San People and the non-existence so called sensitive environment as backdrop for soliciting donations to the NGOs and for friends and family not necessary for the rural people of Kavango West and East who are swimming in inherited generation poverty, you also seems to have taken the project as new business opportunity. However, in most instance, you are just being used by those non-profits bodies that are making more money through EUR and USD donation receipts based on your uninformed noise rattle.	Response was requested and provided to the issues raised and these issues where applicable have been considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Annex 3: Detailed consultation process undertaken

It is really a shame and answers to your questions are provided below in full technical detail.

Many thanks,

Dr. Sindila Mwiya

From: Max Muyemburuko <max.muyemburuko@gmail.com>
Sent: Friday, 22 January 2021 2:28 PM
To: smwiya@rbs.com.na
Subject: Questions

Dear Dr. S. Mwiya

May you highlight me on this questions as in the meeting i did not get chance to ask this.

1) In the scoping report there is no discussion or investigation of the effects of seismic testing on shallow water wells in the region. Hundreds of small communities line the roads that ReconAfrica wants to shoot seismic lines on with huge "thumper" trucks. According to the Canadian province of New Brunswick's Conservation Council, seismic testing can damage the wells people get their drinking water from, and has led to the loss of water in at least 60 homes there. They say that only by doing baseline (before-seismic) water testing at every well location, then doing it after the seismic testing can any possible damage or pollution from the activity be understood. There is no attempt by Mr. Mwiya to do any baseline water tests at all and he does not even consider this possible impact in the context of the extremely shallow groundwater level (less than 30m deep) in most of their license area. A link to this serious issue in Canada is here: https://tinyurl.com/y4ryqzld

You article link is 100% irrelevant to the proposed scope of work, source energy and receivers to be used for the proposed 2D Seismic survey. In your so called reference document and I quote "*Use of **explosive devises**, which create shot-holes in the ground, can create access to surface contaminants into groundwater if not properly filled in, and it is possible seismic waves sent out by thumper trucks can mobilize sedimentation into a well or cause well integrity problems.*

There are no explosive devices whatsoever that will be used as the source of energy for the proposed survey. The source of energy for the proposed survey will be free weight drop from the Explorer with wireless geophones. The survey will use existing roads and I did not see any boreholes in Kavango West and east located in the middle of roads. If there are issues with existing boreholes designs integrate, then that should have happened when these roads were constructed using very heavy compacting road construction equipment. Additionally, these roads are today being used by all types of vehicles at presents and some vehicles are even heavier than the proposed survey tracks. Seismic survey have been successfully conducted in Namibia before and I have been involved in Maltahöhe survey conducted in 2007 and Kavango West Region survey conducted in 2017 and both surveys had no environmental issues whatsoever and I know what I am talking about and I studied geophysics including seismic survey.

2) The lack of ability for people to travel and be an active part of this process is extremely limited right now given the current COVID crisis. Given the limitations of gathering to only fifty people and the EAP's unwillingness to live stream public consultations means that the vital inclusion of registered interested and affected parties, and community meetings to help local people understand this process cannot go ahead freely. We ask that this application be put on hold until such a time after the pandemic when local people can be informed and have their input registered.

I am so shocked that in your right mind you think local people in Kavango East and West Regions do not know what they want in their lives and the type of development projects they would like to see in their area. Why should you expect privileged foreigners who do not even know where Ncute is located or where the Area of Interested is situated and have already made-

	up their mind that the Proponent is drilling on the Banks of the Okavango River and inside the Okavango Delta to now be advisers to the local communities. Well attended public meetings have been organised by the Regional Councils and Traditional Authorities, and the local communities fully supports the developments being proposed in their areas. The application is indeed going ahead and has nothing to do with COVID. 3) The piecemeal approach of ReconAfrica to the mandated EIA process, starting with the previous EIA for the current well drilling program, and then continuing with this next one for seismic surveying seems tailored to slowly ratchet up approval of this project in an effort to get approvals without looking at the project as a whole. I feel that an Integrated Environmental Assessment is needed to fully inform the decision making process. This would mean setting aside the last EIA and creating a whole-project approach that looks at the entire life cycle of this development, from exploration, surveying and eventually even production and how the environmental effects of it can be taken into full account. It very sad to see that people like you Max Muyemburuko who have zero experience or training in oil and gas exploration now want to be overnight experts. What you are proposing is absolutely irrelevant. Mr. Max, Oil and Gas exploration is not want think it is and let not try to be clever on highly technical issues that you do not understand. Despite the fact that it fully explained in the Draft Scoping Report, some stakeholder including yourself, have already made-up their mind based on social media uninformed and opportunistic donation-based business postings that is claiming that there is fracking taking place on the Banks of the Okavango River and the Okavango Delta. The current project activities are greenfield exploration. In brief oil exploration involves, application for license, geophysical desktop study to look for areas of interest within the license area, if the sedimentary basin is known, seismic survey is implemented to search for potential reservoir structures and if found exploration well drilling is conducted. If there is a discovery, then appraisal drilling is conducted to assess the economics of the discovery and possible development options. Each of the exploration stage requires separate EIA to be conducted. And fracking which is used in water abstraction is a production method after a commercial discovery of oil or gas in a reservoirs with limited permeability. ReconAfrica only has geophysical data-based confirmed basin and the current ongoing drilling of the stratigraphic well is meant to validate and confirm the presence of the sedimentary basin they named Kavango Basin to be followed by 2D seismic survey. Over the last 15 years, I have been involved in eight (8) offshore well drilling operations in Namibia and plenty more minerals and petroleum exploration projects that I am current supporting and also being supported by many other consultants in different parts of the onshore and offshore Namibia and where the investors have promoted the potential of their exploration projects to international markets. This project is no difference, it just an exploration project with assumed sub-knowledgebase and an overall knowledge-base that must be de-risked in order to improve the boundary conditions that underscores the exploration knowledge-base model objectives. 4) On page 80 Table 3.2 of the scoping report Mr. Mwiya states that “No removal of protected species or mature trees are anticipated because the activity will require the widening the existing tracks as may be applicable.” This is unacceptable, considering there are a number of protected species in the license area and they plan to run huge trucks 450km through deep bush, widening roads as they go. This is obvious from the photo of Line EW5 on Plate 1.24 on page 37 of the Scoping Report, where hundreds if not thousands of trees will have to cleared over many kilometers to widen the road for the huge trucks. There are no studies to say whether nesting birds will be killed, what kind of plants will have to be destroyed and where, what indigenous trees might be killed and most especially some of the tracks they want to use are in the bed of the Omatako river, meaning this activity would definitely fall within 100meters of a watercourse, see Plate 1.21 page 34, where the line is right next to the riverbed. It is clear that this rushed scoping report is designed to eliminate the need for environmental oversight like the Forestry Act, 12 of 2001 and The Nature Conservation Ordinance 4, 1975. What are the long-term implications of these new wide roads on poaching? On illegal plant harvesting? Mr. Mwiya doesn’t include any data about this at all and due to this we ask you to set aside this ECC request. Max, you wrote and quote: “*This is unacceptable, considering there are a number of protected species in the license area and they plan to run huge trucks 450km through deep bush, widening roads as they go”*. Are you okay and do you really understand and see images provided and what is proposed or you are just tyring to seek some limelight out of nothing and out of a project that you absolutely do not understand at all. Existing roads and tracks do not have trees because the trees where cleared when the roads and tracks were constructed, in case you do not know and there no need to widen any road		

	unless requested as part of the CSR. It is really sad to see this so low level of ignorant environmental advocacy that you are displaying. How do you expect to have hundreds if not thousands of trees to be cleared over many kilometres to widen the roads that are already existing as shown in Plates 1.1-1.24. This is utter blindly stupidity and nonsense of the highest level I have never ever seen that you even decide not see the clear images provided Plates 1.1-1.24 and still write trash to me about clearing exiting roads and tracks, what is wrong with you? 5) In Texas 142 homes were damaged by seismic testing like the sort ReconAfrica wants to carry out along the settled roads of Kavango East and West. Hundreds, perhaps even thousands of homes, many made from mud or light brick and concrete, are within a hundred meters of the roads that ReconAfrica wants to shoot their seismic test lines on. Serious home damage may occur and Mr. Mwiya has not mentioned anything about this in the draft Scoping Report, an egregious error that should disqualify this report and again, necessitates a strategic environmental management plan in order to understand the full affects of this operation on the people and the environment of Namibia. Learn more about the dangers of seismic testing in the USA at this link: https://tinyurl.com/yxnsmg74 Seismic survey have been successfully conducted in Namibia before and I have been involved in Maltah►►area in 2007 and Kavango West Region 2017. Please read the attached really academic research conducted by the United State Geological Survey on seismic survey not your subjective and selective unpublished useless links. The proposed survey will even use a much small vehicle as the an energy source compared to the Vibroseis covered in the study attached. 6) From the day oil and/or gas is discovered to the day the first electricity is generated from it is around eleven years, compared to around five months for solar or wind, according to the South African CSIR. Given the dire state of climate change, and the abundant wind and sun resources in Namibia, it is baffling to understand why this plan is being pursued at all, locking the country into decades of oil and gas dependence at a time when we have passed peak oil with low prices and with many countries phasing out oil and gas for renewables. According to the Act, alternative energy systems must be explored in the EIA, which hasn't been done, either in this EIA or the first one for the exploration drilling. Max, this is not your question, it has been copied from previous communications that were send to me by some foreigners and local conflicted NGOs who do not even know where Kavango Region is located. The EMA Act 2007 does not state that, **alternative energy systems** must be explored in the EIA, its states that alternative project development options mut be explored to which such alternatives have been explored indeed. Please read the reports properly, I know that you are already blinded by preconceived, unfounded and being used by foreigners and NGOs whom themselves are making a lot money through donations and in name of fighting for the local people and the environment while you are just running around promoting their unfounded agendas, it like stock exchange in case you do not know. In conclusion, it is indeed with great sadness that after 30 years of independence we still have so called indigenous enlightened people but without independent mind and still depend on Eurocentric and colonial thinking even when it is obvious that they are being used by those they think are behind them, really sad and sand indeed. Having worked in the most remote areas of both Kavango West and East Regions in the last five (5) years undertaking petroleum aerial gravity and magnetic surveys, ground seismic surveys and geochemical soil sampling for oil and gas feeding bacterial profiling operations, I have come across families who twice a week leave their woody and grassy homesteads in so called "sensitive environment" and walk for four (4) hours one way to reach the nearest public school where they could fetch water, came across homestead dilapidated to the state that makes your heart sink, came across many educated local people without jobs and with no prospects of emerging out the cycle of multiple generational poverty, came across young people with no any other economic opportunity whatsoever except cattle herding, grass and wood harvesting, came across young people with HIV / AIDS and have stopped taking their antiretroviral therapy due to lack of food or could not reach the nearest clinic in the general area because it is just too far to reach on foot and I have driven through extreme sandy poor access tracks connecting majority of the villages, it is appalling to see that those with no knowledge whatsoever about oil and gas exploration that could uplift the living standard of the local people and the nation as whole in an event of a commercial oil or gas discovery want see the current status core of underdevelopment and poverty prevailing in both the Kavango West and East Regions centred on inherited generational poverty while themselves thrives in name of environmental protection.		

	It is high time that Governments in Africa and especially Southern Africa, Namibia included, move swiftly to regulate the emergence of opportunistic foreign funded environmental clique movements because for one to choose the World-renowned Okavango Delta, Okavango River as well as the San People as the backdrop for personal fund-raising campaigns and drives for donations to the so called “non-profits” and for own personal, family and friends incomes, while the majority of Namibians in Kavango West and East where the true project is situated continue to languish in poverty and illiteracy is unacceptable, Mr Max and you should know better. Certain blinded local people are being used by hypocritic foreign-based entities and individuals funding opportunistic environmental privileged cliques movements that are aimed at sabotaging national developmental programmes, while their own countries continue to produce oil and gas, generate electricity from coal and will continue to emit tones of greenhouses gases into the atmosphere for many decades to come, are indeed guilty of promoting environmental protection-based colonialism and perpetuating current and future generational poverty in Kavango West and East. It is typical of the colonial times, when religious books were waved in villages, jungles, savannahs, wetlands, and deserts while at the same time those who were waving the religious books were busy harvesting local resources including slaves and today environmental placards and online messaging are being pushed by opportunistic environmental messiahs benefiting or wanting to benefit in the name of environmental protection through donations and for their own personal, family and friends incomes drives, while the local masses continue to swim in multiple generational poverty. The advocacy space has become crowded with environmental champions including opportunistic and blinded local people seeking some limelight. Regard Max Muyemburuko Chairperson Kavango East and West Regional Conservancy and Community Forest		
11.26	**From:** Samson Mulonga <mulongas@gmail.com> **Sent:** Tuesday, 2 February 2021 6:03 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** smwiya@rbs.com.na **Subject:** Re: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia Dear Dr. Mwiya Thank you very much for sharing the scoping report and for the presentations today during the PP meeting for the 2D seismic survey. I couldn't get in as by the time I arrived it was already full. However please find attached the WWF Namibia statement which encourages the Strategic Environmental Assessment. While watching online one lady towards the end of the session asked if a SEA would be done and you responded that Recon will look into it. Is this something you think is possible? with maybe MEFT driving it? We feel a SEA is the best way to go for all involved (Recon, government, stakeholders and communities). Regards Samson Mulonga (WWF Namibia)	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA Report Chapter 1 Table 1.1
11.27	**From:** Rachael Harlech-Jones <rachael@visitnamibia.net> **Sent:** Thursday, 4 February 2021 10:57 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; 'Sindila Mwiya' <smwiya@rbs.com.na> **Cc:** Teofilus.Nghitila@met.gov.na **Subject:** RE: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr Sindila Mwiya Below are my concerns about the initial 2D seismic surveying:		

	1. There seems to be mixed reports about whether the drill pit close to Kawe was properly lined. Considering its proximity to the village, this is extremely worrying especially considering the depths that the drill is going and the possibl radioactive material that may be accessed. 2. I appreciate that the seismic surveying proposed is using more environmentally senstive equipment but this does not seem to negate the danger of contamination through unforseen ground movement. Creating local boreholes does not seem to tackle the more concerning long-term effects. 3. There seem to be mixed reports regarding the involvement of the local communities in the exploration region. For instance the cancellation of the Mbambi community meeting. 4. The seismic surveying may damage local buildings. What is being done to reduce this risk and if damage does occur, are adequate measures in place to properly compensate those affected? However, for me, and I believe most people who are opposing this project, the real issue is not the initial seismic surveying but the end game if oil is discovered. Cutting the process up into more palatable sections does not diminish this concern. Repeatedly saying that this is only an exploratory stage does not remove this fact. Namibia is one of the few places on earth that has not been trashed by human development and is a sanctuary to a great diversity of wildlife and flora. The fact that the Kavango is home to endangered animals such as wild dogs and pangolins is just one of many reasons this project should not go ahead. On top of this, the idea that we should be embracing the development of fossil fuels when solar is clearly a much more sustainable option in Namibia, makes ReconAfrica's project entirely unacceptable. regards Rachael Additional info requested: Full name: Rachael Katherine Harlech-Jones Contact Numbers: +264 (0)61 225345 / +264 81 3171304 Organisation that you are representing: Member of the public	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA Report Annex 3
11.28	**From:** Sharon Eckman <sharoneck.se@gmail.com> **Sent:** Friday, 5 February 2021 6:15 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr Sindila Mwiya Please see below for my concerns regarding the initial 2D seismic surveying: 1. From what I have read and also seen on photographs, it is unclear whether the drill pit close to Kawe was lined properly - this despite assurances that it had been. The drill pit is in close proximity to the village and if it has not been properly lined, will potentially have a serious impact on Kawe - fracking drills go deep into the ground and can release toxic material when doing so. 2. Were the local communities properly consulted? This seems unclear both from what I have read and watched online (public meeting of concern) and it appeared to me that they were not and also that there concerns were not taken that seriously. In addition, there was a cancellation of a community meeting - can you explain this? 3. What is being done to reduce the risk to damage of local buildings when the seismic surveying is carried out? 4. What happens if oil is found following the initial surveying? Conservation is enshrined in the Namibian constitution, and the government has always said it would oppose fracking. How is this even being allowed? Namibia is renowned for its pristine environment and indeed environmental protection for its diversity of flora and fauna. The Kavango is home to endangered animals such as wild dogs and pangolins - and pangolins are already the most traffiked animals on earth. 5. We are in a climate emergency. What possible justification can there be for trying to access more fossil fuels? Solar power is a much more sustainable and obvious option for Namibia apart from anything else. ReconAfrica's project is retrograde, reactionary and undoubtedly not in the best interest of the country and indeed the planet.	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	Best wishes Sharon Eckman Additional information: Full name: Sharon Frances Eckman Contact number: +(00)44 7855975213 Organisation represented: Concerned member of the public		
11.29	**From:** Auriol Ashby <Ashby@aacc.com.na> **Sent:** Wednesday, 10 February 2021 11:19 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; smwiya@rbs.com.na **Cc:** Marvin Sanzila <marvinconsultants@outlook.com> **Subject:** Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia Dear Sandila, Here is a further comment which I would like recorded in the Scoping Report regarding the EIA Process for the 2D Seismic Survey. Please include this in full in the IAP report. The Environmental Impact Assessment Regulations (No 30 of 2012), in terms of the Environmental Management Act 7 of 2007, clearly state the general requirements for an Environmental Assessment Practitioner (EAP). In Section 4, the Regulations state "4. An EAP designated in terms of Section 3, **must** ….(b) **perform the work relating to the application in an objective manner**, even if this results in views and findings that are not favourable to the applicant". 1. At the public meeting held in Windhoek on 2nd February 2021 at 10am, Dr Sandila Mwiya's introduction clearly demonstrated his lack of objectivity towards the EIA process. He said "On this specific project, I am actually a consultant to ReconAfrica, supporting them to get a permit for the proposed 2D seismic survey". A Live recording is available on https://www.facebook.com/namibiansun/videos/252377499630086 2. The Draft Scoping Report, is boldly entitled "Application for ECC …", which again implies little or no objectivity to the EIA. 3. In the same Draft Scoping Report, Piii, Dr Mwiya's Statement of Qualifications includes the following: "Currently, (2020 - 2023) Dr. Sindila Mwiya is responsible for **permitting planning through to operational and completion compliance monitoring** …. for multiple major upstream onshore and offshore petroleum, mineral and mining projects, Solar and wind projects .." **I believe that the EIA process and scoping report demonstrate a lack of objectivity which disqualifies Dr Mwiya from being an EAP for this project.** Please only include your response to this comment in the Scoping Report. I do not want to be bullied and insulted again, as per your email of the 18th January. Perhaps I should raise your intimidation tactics towards IAPs as another objection to the EIA process of RBS. Regards Auriol Auriol Ashby Ashby Associates cc P.O. Box 11513 Windhoek, Namibia Tel: (+264) 61 233679 Cell: (+264) 81 240 9678 Fax: (+264) 88637016 **From:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Sent:** Thursday, 21 January 2021 11:22 AM **To:** 'Auriol Ashby' <Ashby@aacc.com.na> **Cc:** 'marvinconsultants@outlook.com' <marvinconsultants@outlook.com>		

	Subject: RE: Comments as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 **Importance:** High Dear Auriol, Please see my comments in red below. Many thanks, **Dr. Sindila Mwiya** **From:** Auriol Ashby <Ashby@aacc.com.na> **Sent:** Monday, 18 January 2021 6:16 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Comments as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Sindila, Thank you for registering me for the above project and sending me Volume 2 of 3 for petroleum exploration. (You may not be aware but when it opens in Acrobat it is called "Vol. 2 of 3 EIA for Solar Energy (SECURED)". The details of my contact details were in my email footer: Ms Auriol Ashby, Director of Ashby Associates cc Tel: (+264) 61 233679 Cell: (+264) 81 240 9678 I am a practicing socio-economist in Namibia since 1994 and I have provided specialist services to many proponents requiring EIAs since 2008. I support projects which bring sustainable development to Namibia's people and I strongly believe in the value of well researched and objective EIAs which have been clearly presented to all IAPs. My comments, which I expect you to attach to the EIA Scoping Report to be submitted to MEFT, are as follows: 1. Re: Draft Scoping Report, Jan-2021: P1, paragraph 2 refers to a Petroleum Agreement already signed between ReconAfrica and the GRN. For full public transparency, this agreement should be copied in the Final Scoping Report, as the seismic surveys are only a small part of the overall project plan. This full transparency is essential as ReconAfrica published on LinkedIn on 18 September 2020 the following details: *"RECON AFRICA DISCOVERS KAVANGO BASIN IN NAMIBIA* *ReconAfrica is a junior oil and gas company engaged in the exploration and development of oil and gas in Namibia. ReconAfrica holds a 90% interest in a petroleum exploration licence in northeast Namibia which covers the entire Kavango sedimentary basin. The exploration licence covers an area of approximately 25,341.33 sq km (6.3 million acres), and based on commercial success, it entitles ReconAfrica to obtain a 25 year production licence. The Kavango Basin offers both large scale conventional and non-conventional play types." (My highlight in yellow")* *ReconAfrica acquired a high resolution geomagnetic survey of the licence area and conducted a detailed analysis of the resulting data and other available data, including reprocessing and reinterpretation of all existing geological and geophysical data. The survey and analysis confirm that the Kavango Basin reaches depths of up to 30,000 feet, under optimal conditions to preserve a thick interval of organic rich marine shales, and is anticipated to hold an active petroleum system".* 1.1. A Petroleum Agreement is a confidential document. All the key provision of the Agreement are provided in the Draft Scoping. Secondly you can download the MPA from www.mme.gove.na. The Seismic survey is one of the exploration commitments that ReconAfrica must undertake. Promotional materials of ReconAfrica has nothing to do with the current proposed scope of work of undertaking a 2D seismic survey and requiring an ECC. 2. Re: Draft Scoping Report, Jan-2021: Pxi, paragraph 4: This paragraph is confusing. It states that "following on the drilling of the stratigraphic wells, the company intends to conduct 450km long 2D seismic survey operations …. Depending on the outcomes of the proposed 2D seismic survey, exploration drilling … may be undertaken..". Please clarify in the Scoping Report whether the drilling of the 2 wells, for which RBS conducted at Environmental Assessment in June 2019, have been drilled already and if so, what were the results? 2.1 It not confusing. The only problem is that so many people want to be experts of highly technical field of oil and gas exploration that they do not understand, have no experience and no technical training whatsoever. Despite the fact that it fully explained in the Draft Scoping Report, some stakeholders have already made-up their mind based on social media uninformed and opportunistic donation-based business postings that is claiming that oil has been discovered and production	Clarifications were provided to the issues raised and these issues where applicable have been considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

will taking place in the Okavango Delta. The current project activities are greenfield exploration. In brief oil exploration involves, application for license, geophysical desktop study to look for areas of interest within the license area, if the sedimentary basin is known, seismic survey is implemented to search for potential reservoir structures and if found exploration well drilling is conducted. If there is a discovery, then appraisal drilling is conducted to assess the economics of the discovery and possible development options. ReconAfrica only has geophysical data-based confirmed basin and the current ongoing drilling of the stratigraphic well is meant to validate and confirm the presence of basin to be followed by 2D seismic survey.

3. In the RBS June 2019 EIA volume 2 of 3 for the drilling of 2 wells in Blocks 1819 and 1820, page 68: RBS reports that the Regional political and traditional leaders consulted, have given "greater positive support from IAPs because if the results of the proposed petroleum drilling operations prove positive, it will tremendous and positively transform the local, regional and national socioeconomic landscapes of Kavango West Region and Kavango East Region and Namibia as a whole". **RBS documents that the project is of national importance and therefore at least one public meeting should be held in Windhoek** AND that meeting should enable virtual access via Teams or Zoom so that IAPs can attend and comment virtually without being at risk of spreading COVID-19.

3.1 Auriol, just like in many minerals EPLs, this project is a very early stage exploration project with zero guarantees for discovery because it is exploration situated in Kavango West and East and has nothing do to with any other region, town or village outside the area of interest. Over the last 15 years, I have managed 8 offshore well drilling operations and plenty more minerals and petroleum exploration projects that I am current supporting and also being supported by many other consultants in different parts of the onshore and offshore Namibia and where the investors have promoted the potential of their exploration projects to international markets but I have not seen public meetings being conducted in Windhoek just because there is an assumed "potential" for a discovery that does not yet exists. This project is no difference, it just an exploration project with assumed sub-knowledgebase and an overall knowledge-base that must be de-risked in order to improve the boundary conditions that underscores the exploration knowledge-base model objectives.

4. The current draft scoping report for the 2D seismic survey does not indicate any potential negative impacts. You have set up an Assessment matrix used for assessing the likely significant impacts (p111), yet you have not documented any potential positive or negative impacts to be assessed in the EIA phase.
   a. What are the potential cumulative impacts of 450km of seismic surveys? Localised temporarily. To in the EIA report.
   b. Will new cutlines be opened between existing roads? This is clear in the report please read it. I have very clear drone images and maps showing each and every survey line and you're a still asking questions on cutline, why??
   c. What impact will the seismic work have on wildlife, particularly elephants? There are no elephants roaming in the roads where the survey is going to take place.
   d. What are the potential impacts from extraction should a petroleum resource be discovered, given that ReconAfrica seems to have been granted a 25 year production licence already? Extraction of what? There is nothing to extract. The current Scopes of work or activities requiring an ECC is **2D SEISMIC SURVEY it is not oil or gas production**. It does not exists. How do you expect me to provide you with potential impacts of oil and gas production that does not exists. Even the existence of the Kavango Basin is current unknown and waits the outcome of the ongoing stratigraphic (geological logging) drilling operations. If there is a **commercial** discovery a separate EIA will be done. Production is completely irrelevant to the current scope of work.
5. RBS can be congratulated for arranging field-based meetings /sessions in local villages along the survey lines. The full content of the presentations given at all public and focus group meetings should be included in the Scoping Report. For RBS to present a balanced and objective summary of the project, you should include the short, medium and long-term potential positive and negative impacts of not only the 2D surveys, but also of exploration drilling and full petroleum extraction. These descriptions should be presented in layman's language, as for as is possible. There is no objectivity that can be achieved by writing on resource that do not exist with zero guarantee that there will be a commercial discovery. That is called speculation and is very dangerous and irresponsible misleading of the Capital Markets especially if it is coming from some of us who are supporting multiple international listed companies. The Scope of Work is clear **2D seismic survey, okay**. Please do not ever try to teach me how to do EIA,s of what not to include and include I really hate this level of disrespect, I am highly technically qualified and experienced and know exactly what I am doing.

	6. The EIA Scoping Report should present the context of petroleum exploration (and future potential production) in terms of Namibia's current and future commitments to reducing activities that promote climate change. Please see a point 5. Production is irrelevant to the current scope of work, which is 2D seismic survey. In my view you seem not to understand oil and gas exploration. You are talking of including future production, production of what. There is nothing to produce!! In comparison to what many may be familiar with and in this case minerals and mining, imagine a greenfield minerals exploration EPL EIA where nothing is known and a client is only doing seismic survey to identify potential targets within the EPL and you expect such an EIA to discuss and assess potential impacts of mining operations (underground, open pit IRM etc). If there is a commercial discovery appropriate multiple EIAs will be done and final one will be undertake as part of oil or gas field development feasibility study. Please inform all IAPs as soon as a date for a virtual Windhoek meeting date has been set. Best wishes, Auriol Auriol Ashby Ashby Associates cc P.O. Box 11513 Windhoek, Namibia Tel: (+264) 61 233679 Cell: (+264) 81 240 9678 Fax: (+264) 88637016		
11.30	**From:** Vera Pfannerstill <vpfanne@gwdg.de> **Sent:** Thursday, 11 February 2021 11:37 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Subject:** Re: Extension of the Deadline for Submission of Written Inputs for Proposed 2D Seismic Survey Over AOI in PEL 73, Namibia Dear Dr. Mwiya, I am a PhD student in wildlife sciences at the University of Goettingen in Germany. I hold a Bachelor of Science degree in Biodiversity and Ecology and a Master of Science degree in Engineering in Ecology and Biodiversity Management. I furthermore hold degrees of certified project management courses and have volunteered in the field of sustainable development since 2010. I have been working in several tropical countries in field studies on animal behaviour and ecology, among them Madagascar, Brazil, Tanzania, and last year for a full 11 months in Botswana. Thank you for your thorough Draft Scoping Report for the proposed 2D seismic survey operations. I acknowledge your expertise in geology and your practical field-based technical industry experience. I also acknowledge that you have taken into account that the operations have environmental impacts such as noise pollution and waste production. However, I have some points of critique. One major point is your statement that oil and gas fields can help Namibia to transform to a greener economy in the next 20-30 years (page 6, section *1.3.3 Current Project Motivation*). A country cannot turn into a greener economy when it uses fossil fuels to get there. If already reducing carbon emissions is not enough to limit the global temperature rise, producing even more will in any case worsen the carbon balance of the country. Fossil fuels, which include economic hydrocarbon, have to be left in the ground (https://www.newscientist.com/article/dn24299-ipcc-digested-just-leave-the-fossil-fuels-underground/). Therefore, even if the survey itself would have minor environmental impact, it is only a preparation for activities that will have major – and global – environmental impacts and are to be avoided. A survey for hydrocarbon extraction is an unnecessary disturbance and does not provide any long-term benefits for the country. The possible, and likely negative impacts of hydrocarbon extractions in the area are highlighted elsewhere (https://www.petro-online.com/news/safety/15/breaking-news/why-is-oil-exploration-controversial-in-namibia/54278?fbclid=IwAR1uxhagBQGXDMM0yVbBwgLZGkpG701KGAEvOVBOI-TNLorsnOOFRMmItEs).	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	Furthermore, it came to my knowledge that participants of the local communities in the stakeholder meetings were not given the time to express their concerns about the seismic survey. Could you provide me with a detailed timeline of the meetings from 23rd to 25th January and the actual time that members of the local communities spoke? In section *4.3.2.3 Mammals* you mention some of the mammal species in the area. However, there is no information about how they are affected. It would be necessary to take their daily and yearly behaviour into account. Many of the mentioned species have large home ranges and migrate between the National Parks and Community Conservancies in the affected area. Simply stating their occurrence does not inform about the impact that the proposed operations might have on the populations. Furthermore, although you mention that part of the survey area falls into the Kavango Zambezi Transfrontier Conservation Area, you do not provide the aims and regulations for this conservation area. Is a seismic survey compatible with the long-term overall goals of the transfrontier conservation area? In section *5.3.2 Proposed Project Alternatives and Ecosystem Assessments* you mention the "No Action Alternative". It is stated that negative environmental impacts are still likely to take place even in the absence of the proposed petroleum explorations. While this might be true, you do not propose any other alternative of better projects. Instead of a seismic survey, a survey of solar energy, wind or the effects of reforestation and improvements of the wetlands in the area could be undertaken. Yes, development might be poor in the area and the people likely do seek employment. However, this does not have to take place with compromising the region's and the world's future. Please provide a long-term environmental impact assessment including worst-case-scenarios where the consequences of a completion of the seismic survey, ongoing oil extractions, ground water pollution, oil spill into the adjoining rivers, air pollution and health effects for the local communities are explained. Please include the costs of these worst cases. Then, please seek examples of sustainable, environmentally friendly projects that could also be undertaken in the area and their possible benefits. You may compare the long-term costs of worst-case scenarios of the sustainable projects with the long-term costs of worse-case scenarios of the seismic survey, but one should not compare the best case of the one with the worst case of the other. The seismic survey with its prospect to oil extractions does stand in contrast to the 17 UN sustainable development goals by providing only short-term jobs and long-term environmental, health, water supply and food production risks. Therefore, the decision for an Environmental Clearance Certificate for the seismic survey is a decision that will stand for the future of Namibia's development and its position in between countries leading towards carbon emission free economies and should be taken in favour of sustainable, emission-free solutions. Thank you very much for your consideration. Kind regards, Vera Pfannerstill Vera Pfannerstill M. Sc. Engineering in Ecology and Biodiversity Management PhD candidate Wildlife sciences, University of Göttingen vpfanne@gwdg.de		
11.31	**From:** Louis Lambrechts <louis@naturaljustice.org> **Sent:** Friday, 12 February 2021 5:43 PM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na> **Cc:** Melissa Groenink <melissa@naturaljustice.org> **Subject:** ReconAfrica's 2D Seismic Surveys Draft Scoping Report - Comments Dear Dr. Mwiya, Natural Justice, as a registered I&AP, hereby submits the comments on the draft scoping report for ReconAfrica's 2D seismic surveys found in the document here attached. Please confirm receipt hereof. Natural Justice is working directly with several communities living within or near the licensed area in both Namibia and Botswana. We ask for these comments to be carefully considered and answered for in the final scoping report.	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken

	Sincerely, Louis Lambrechts		
11.32	**From:** Corinna Van Cayzeele <cc.vancayzeele@outlook.com> **Sent:** Saturday, 13 February 2021 1:28 AM **To:** Dr Sindila MWIYA <frontdesk@rbs.com.na>; smwiya@rbs.com.na **Subject:** Re: Confirmation of Your Registration as a Stakeholder for the Proposed 2D Seismic Survey Over AOI in PEL 73 Dear Dr. Mwiya, In the absence of further guidance for submission of statements, I am sending my brief comments to you by e-mail. My name is Corinna Van Cayzeele, phone number +44 75 1720 9670, I write as a conservation scientist and global citizen, not as representative of an organization. First, it is not clear to me why test drilling already began in January, when the application process for Environmental Clearance is only at the Scoping Stage and affected parties, including indigenous peoples, were not comprehensively consulted before. While this makes me strongly question the validity of your approach, I hope to see a turnaround as the ECC application process proceeds. The argument of only conducting a survey and testing for oil does not count as the plan is unambiguously to exploit any oil fields found. How is the potential damage to local communities and the wider affected human population, the ecosystem and wildlife supposed to be equally offset? However, the devastating impacts on people's lives, ecological balance and endangered species would start before that. Pump testing for oil could contaminate the groundwater in the aquifer underlying the area. Most of the trees in the area have deep roots to tap into the groundwater, so will also suffer if the groundwater is contaminated which could trigger an ecosystem collapse. Furthermore, as you will be aware, the Kalahari lies on a connate sea- if this water table is raised due to drilling activities the freshwater ellipse could also be contaminated. In your scoping, you say how important the oil exploitation following the Seismic survey would be to help future generations escape poverty and reach the climate goals in the long term. The fact that this statement proves a misunderstanding of the urgency of the climate crisis and required actions to slow it is only the least concerning part of it. The poverty and misery you are describing will hardly improve if you put the groundwater supply and its quality at risk and destroy large parts of a network of ecosystems vital to prevent desertification. The joint expertise, energy and power within Recon Africa and its funding providers could be used to promote the financial potential of sustainable energy business in Southern Africa, such as solar energy. It could help enable people, biodiversity, and the health of the planet on which we all depend to thrive rather than to restrict this possibility and start to destroy one of the world's most precious forest systems and wetlands. In the hope of a more thorough and complete EIA, adequate consultation of stakeholders not reached by internet, and the compliance with Canadian and international environmental best practice standards in any future venture, I remain with Kind regards, Corinna Van Cayzeele	Submission made with no need for a response and issued raised considered in the EIA and EMP Reports as well as in the relevant annexes on flora, fauna, public, stakeholders and community consultation processes	EIA and EMP Reports and Annexes Project team Qualifications and declaration Annex 3: Detailed consultation process undertaken