



**Bannerman Etango Project**  
**Public Consultation and Disclosure Plan**

**Draft 4**

**March 2011**

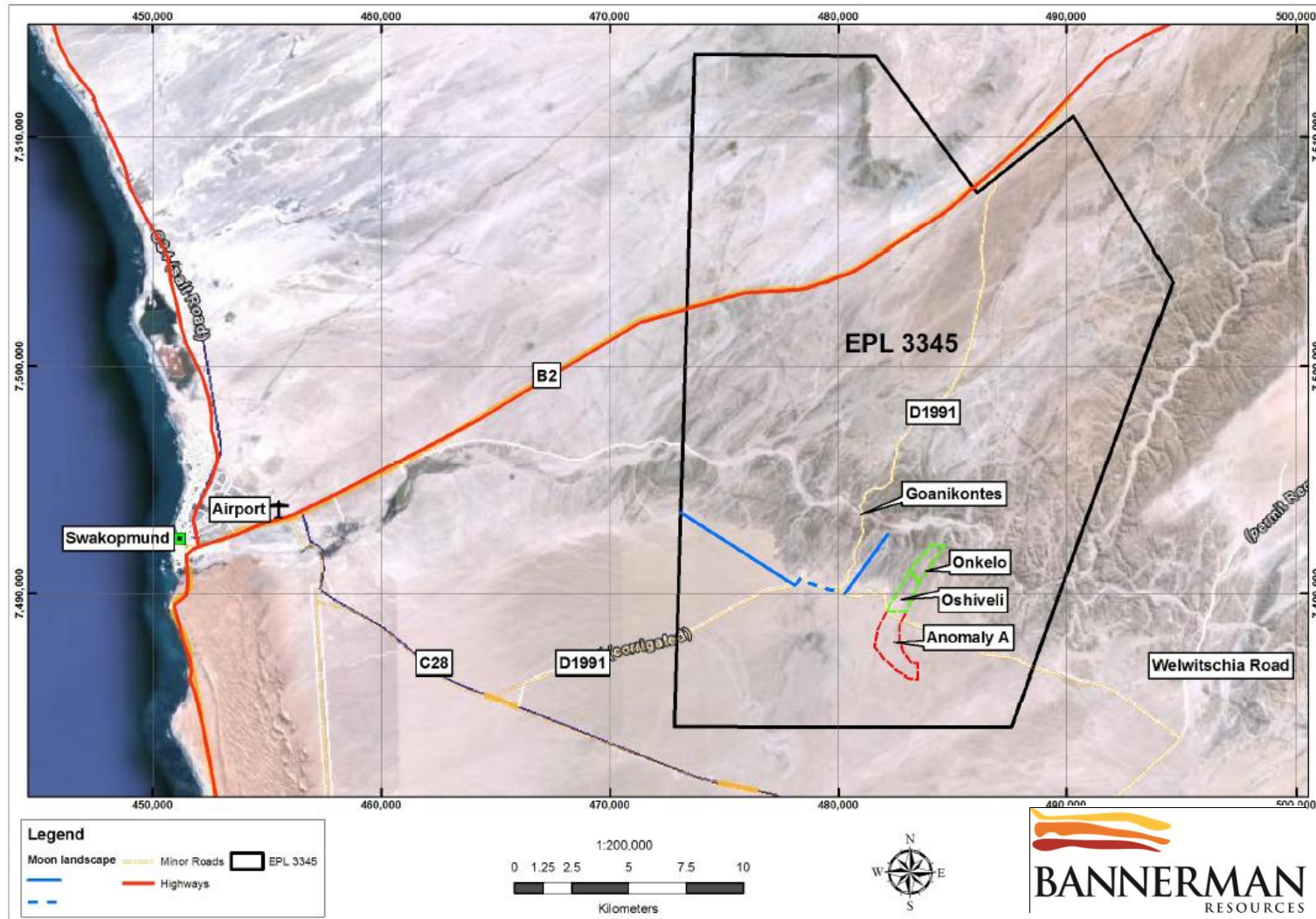
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## Acronyms

Amendment ESIA	The ESIA which is based on technical specifications contained in the PFSU
Amendment ESMP	The ESMP which is based on technical specifications contained in the PFSU
ASEC	A. Speiser Environmental Consultants cc
CCO	Corporate Communications Officer
CoM	Chamber of Mines of Namibia
CTAN	Coastal Tourism Association of Namibia
DFS	Definitive Feasibility Study
EA	Environmental Assessment
EMA	Environmental Management Act
EPL	Exclusive Prospecting Licence
ERM	Environmental Resource Management
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plans
FGD	Focus Group Discussion
GRN	Government of the Republic of Namibia
IAP	Interested and Affected Party
IFC	International Finance Corporation
LOM	Life of Mine
MCP	Mine Closure Plan
MET	Ministry of Environment and Tourism
ML	Mining Licence
MME	Ministry of Mines and Energy
NamPort	Namibia Ports Authority
NamPower	Namibia Power Authority
NamWater	Namibia Water Corporation Ltd
OP	Operational Policy
PCDP	Public Consultation and Disclosure Plan
PFS	Pre-Feasibility Study
PFSU	The PFS Update completed by Bannerman in December 2010
PLO	Public Liaison Officer
PPP	Public Participation Process
RSA	Republic of South Africa
SAIEA	Southern African Institute of Environmental Assessment
SEA	The Central Namib “Uranium Rush” Strategic Environmental Assessment prepared by SAIEA
SME	Small and Medium Enterprises

Figure 1. Map showing the location of Bannerman's EPL 3345



# 1. Introduction

Bannerman Mining Resources (Namibia) (Pty) Ltd (Bannerman) is 80% owned by Bannerman Resources Limited based in Perth, Australia, and has applied to the Government of Republic of Namibia (GRN) for a mining licence for the Etango Project. The proposed uranium mine lies within EPL 3345 in the Namib Naukluft National Park, 41 km east of Swakopmund and 47 km northeast of Walvis Bay. (see Fig 1.)

## 1.1 Etango Project Setting

An Environmental and Social Impact Assessment (ESIA) assessed the project on the basis of an Interim Pre Feasibility Study and was presented to the Ministry of Environment and Tourism (MET) in December 2009. Environmental Clearance was awarded to Bannerman in March 2010.

As with many mining projects, there have been significant advances in the geological resource modelling, the proposed pit design and also changes to certain aspects of the plant layout. In addition, ancillary projects to the mine, such as linear infrastructure (water pipelines, power lines, roads and railway lines) need to be planned in order to service the project. Due to the potential development of a number of other mines in the Erongo Region, the Geological Survey of Namibia commissioned the Strategic Environmental Assessment for the central Namib Uranium Rush (SEA). This was undertaken by the Southern African Institute for Environmental Assessment (SAIEA) and finalised at the end of March 2010. The findings of this SEA, amendments to the mine footprint and plant layout as well as the environmental and social impacts resulting from the Etango Project's external linear infrastructure, were incorporated into an Amendment ESIA for the project. The Amendment ESIA also included the results of further studies on the traffic impact assessment, occupational health and safety, radiation and groundwater modelling.

The Erongo Region is experiencing strong activity in the Uranium mining sector. Two operating mines (Rössing Uranium and Langer Heinrich Uranium) are major employers; Areva is currently constructing the Trekkopje mine and Valencia Uranium has received a mining licence but is yet to commence construction. Two other potential mines have completed ESIA/ESMPs and applied for Mining Licences: Bannerman's Etango Project and Swakop Uranium's Husab Project. Each of these developments has been engaging stakeholders and the public to some degree as part of their own disclosure processes. The Strategic Environmental Assessment, with a focus on the potential cumulative impacts and benefits of the expansion of mining and associated development in the Erongo Region, is also partly informed by the outcomes of a public consultation process.

Bannerman is aware of the significant risk of stakeholder and public consultation fatigue in this climate, and has designed this Public Consultation and Disclosure Plan (PCDP) to be sensitive to this context. The PCDP aims to balance the need for regular public engagement to address legal requirements and achieve a best practice approach with the need to avoid excessive and repetitive communication and consultation activity.

The Namibian Chamber of Mines Uranium Stewardship Committee, of which Bannerman is a member, aims to address issues of public concern around Health, Environment and Radiation Safety and Security, Waste, cost and non-proliferation.

## **1.2 Public Consultation and Disclosure: Objectives and Key Principles**

Bannerman aims to be aligned with the World Bank Group and its private sector arm, the International Finance Corporation (IFC) standards on Environmental and Social Assessment. The World Bank Group has specific requirements for consultation with stakeholders and disclosure of documentation which includes the preparation and publication of a Public Consultation and Disclosure Plan (PCDP), disclosure of the draft EIA in public places, and preparation of an Environmental Action Plan (EAP).

According to the IFC, good consultation should be free, prior and informed and should therefore:

- Take place as early as possible in the EIA process, be iterative and be carried out on an ongoing basis throughout the life of the development;
- Be based on prior disclosure of relevant and adequate information enabling informed participation;
- Focus on social and environmental impacts and risks and proposed mitigation measures;
- Be inclusive and accessible to all interested parties and be designed to include disadvantaged or potentially vulnerable groups;
- Be culturally appropriate.

## **1.3 Objectives of the Etango Project PCDP**

The Etango Project Public Consultation and Disclosure Plan (PCDP) aims to:

1. Ensure that people affected by the proposed mine and other stakeholders are kept adequately and timeously informed during all phases of the mine.
2. Ensure that interested and affected parties (IAPs) are given sufficient opportunity to voice their opinions and concerns as the plans develop.
3. Foster meaningful dialogue to improve decision-making and build understanding by actively involving individuals, groups and organisations with a stake in the project.
4. Provides opportunities to influence the project design so that its benefits can be maximised and potential negative impacts minimised, thus maximising the project's long-term viability.
5. Build on the public consultation process that has been running since the scoping phase of the ESIA and will continue throughout the life of mine, as an iterative and participatory process.
6. Ensure that the Company conducts itself in a way which preserves and enhances its reputation for being an open transparent company which strives to involve, inform, listen and incorporate stakeholders' views.

## 1.4 Contents of the PCDP

The Etango Public Consultation and Disclosure Plan (PCDP) will:

1. outline the Etango Project;
2. describe Namibia's legal requirements for consultation and disclosure/public participation as well as the consultation and disclosure requirements of International Financing Institutions: namely the IFC Performance Standard's and the Equator Principles;
3. identify key stakeholder groups and Interested and Affected Parties;
4. provide a strategy and timeline with key milestones for sharing information and consulting with IAPs during all phases of the mine life;
5. describe resources and responsibilities for implementing the PCDP activities;
6. detail reporting/documentation of consultation and disclosure activities, including regular review and update of PCDP;
7. Describe the Project grievance mechanism; and
8. Provide a monitoring framework to measure PCDP effectiveness.

Bannerman recognises that the consultation and disclosure is an iterative process and the PCDP is a living document which will be reviewed and updated in consultation with stakeholders on a biannual basis.

## 2. Project Description

The uranium mineralisation at the Etango Project was first discovered in the 1970s, but due to the economic circumstances at the time, no further development took place until Bannerman started exploration in mid-2006. In November 2007, Bannerman completed a Scoping Study for the project and determined an economically viable uranium deposit may be feasible.

### 2.1 Ore reserve

The updated resource estimate (October 2010) estimated total Uranium Oxide ( $U_3O_8$ ) resources of 212 Mlbs comprising a measured resource of 29.3 Mlbs  $U_3O_8$  an indicated mineral resource of 120.4 Mlbs  $U_3O_8$  and a further inferred mineral resource of 63.9 Mlbs  $U_3O_8$ , (using a cut-off grade of 100 ppm  $U_3O_8$ ). This resource is from the original Anomaly A deposit and has been extended to include the Oshiveli and Onkelo deposits and includes satellite deposits which are not incorporated into the Etango Project mine design.

### 2.2 Life of Mine

The life expectancy of the Etango Project is estimated at 20+ years, 365 days per year, with full operations planned to begin in 2015. It is anticipated that at any point during construction, up to 1 500 people will be employed. During operation, more than 900 people will be employed by the mine and its contractors.

On mine closure, it is anticipated that no future alternative land uses are likely to be considered as the mine is within the Namib Naukluft National Park. The mine will be made safe and potentially hazardous areas will be permanently closed off to the public. The Etango Project will have to set cumulative finances aside, from construction onwards, to pay for all mine closure and post-mine closure costs, such as on-going monitoring of groundwater. A Mine Closure Framework has been developed which will form the basis for a Mine Closure Plan. This PCDP will continue to be developed throughout the life of the mine and will be eventually form the basis of the consultation plan for mine closure.

### 2.3 Mining Operations

The mining will follow a conventional open pit drill, blast, excavator/shovel, load and haul truck operation, which is standard for most hard-rock mining operations. In early December 2009 Bannerman announced the completion of its Final PFS which considered a mine design that incorporated the Anomaly A, Oshiveli and Onkelo ore bodies (See Fig 1). In December 2010 Bannerman published a PFS Update which incorporated further detailed studies and test work. This pit is considerably longer than the earlier design (on which the Environmental Clearance is based) and is estimated to be 5.3 km in length (N-S), 1 km wide (E-W) and approximately 380 m deep. As a result of the extension, the mine will be closer to the Swakop River than in the original pit design – the northernmost edge of the pit will be approximately 1.3km from the Swakop River. The revised pit design encroaches on part of the rocky mountain slopes and river gullies in the immediate area.

Further specialist studies were undertaken in respect of the additional environmental impact of the extended pit design and the additional impacts were set out in detail in the Amendment ESIA. The Amendment ESIA was presented to the public for comment in March 2011 and will be lodged with the MET in April 2011.

Bannerman continues its technical and engineering work programme and expects to complete the Definitive Feasibility Study (DFS) in 2012. In parallel to this process, it is intended that an Environmental, Social and Health Impact Assessment (ESHIA) compliant with the IFC Performance Standards and the Equator Principles will also be prepared to meet the requirement of international lenders and Finance Institutions.

## 2.4 The Environmental and Social Impact Assessment Process

The Environmental and Social Impact Assessment (ESIA), including the Amendment ESIA, was conducted by A. Speiser Environmental Consultants cc (ASEC) between October 2007 and March 2011 to establish the merit of the proposed Etango Project within the context of sustainable development in Namibia. The assessment included both the biophysical and socio-economic elements of the wider study area and was carried out by a team of 14 specialists, with three periods of public consultations. Environmental Resource Management Southern Africa (Pty) Ltd (ERM) conducted the Etango Project Linear Infrastructure EIA between September 2010 and March 2011.

**Table 1. Proposed Project Schedule**

<b>Task</b>	<b>Actual and targeted dates</b>
Final PFS announced (Bannerman)	December 2009
Submission of Mining Licence application to MME	December 2009
Submission of ESIA / ESMP to MET	December 2009
Environmental Clearance granted by MET	March 2010
PFS Update announced (Bannerman)	December 2010
Revision of ESIA / ESMP: <ul style="list-style-type: none"> <li>• Extension of specialist studies to include Oshiveli and Onkelo deposits</li> <li>• Incorporation of The Strategic Environmental Assessment (SEA) findings into ESIA / ESMP reports</li> <li>• Numerical groundwater model</li> <li>• Revised air quality study incorporating additional data</li> <li>• Revised Radiation Public Impact and Safety Study</li> <li>• Revised Occupational Health and Safety study</li> <li>• Update of ESMP for construction and operation</li> </ul>	March 2011
Public consultation to introduce Amendment ESIA/ESMP	February 2011
Completion of the Linear Infrastructure EIA	March 2011
Submission of Amendment ESIA/ESMP and Linear EIA to MET	April 2011
Completion of Bankable Feasibility Study and development decision	2012
Submission of ESHIA to international lenders and Finance Institutions	2012
Commencement of construction	2013
Commencement of operations	2015

## 3. Regulatory and Legislative Framework for Public Consultations

### 3.1 Namibian Legislation

**The Minerals (Prospecting and Mining) Act, No. 33 of 1992, Section 50 (f)** stipulates that an environmental impact assessment is required in order to apply for a mining licence.

**The Environmental Management Act, No. 7 of 2007** was promulgated in December 2007. One of the objectives of the Act is to provide for a process of assessment and control of activities which may have significant effects on the environment. To date this Act has not been enacted, primarily because the Ministry of Environment and Tourism (MET) is still in the process of establishing the Environmental Commission. The Act's regulations are expected to be promulgated in 2010 and consultation procedures for EIAs are set out in Section III of the draft regulations, under Section 56 of the Act. The draft regulations and guidelines specify the responsibilities of the proponent are:

- i. To make relevant project documents available to Stakeholders/ IAPs
- ii. To make such IAPs aware of the documents, invite them to express their opinion on the relevant documents within a sufficient period of time and to a specific address.
- iii. to make sure that stakeholders' involvement and participation in an EIA process is undertaken and documented as part of the EIA reporting process.

Until the Environmental Management Act's regulations are promulgated, environmental impact assessments are still conducted in accordance with Namibia's **Environmental Assessment Policy, 1994**. According to this Policy, environmental assessments will, as far as is practicable, set out to:

- better inform decision-makers and promote accountability for decisions taken;
- consider a broad range of options and alternatives when addressing specific policies, programmes and projects;
- strive for a high degree of public participation and involvement by all sectors of the Namibian community in the EA process;
- take into account the environmental costs and benefits of proposed projects;
- incorporate internationally accepted norms and standards, where appropriate to Namibia;
- take into account the secondary and cumulative environmental impacts of policies, programmes and projects;
- ensure that the EA procedure is paid for by the proponent. In certain cases, such as when programmes are initiated by the state, it is recognised that the government is the proponent and will meet the costs of an independent EA;
- promote sustainable development in Namibia, and especially ensure that a reasonable attempt is made to minimise anticipated negative impacts and maximise the benefits of all developments; and
- be flexible and dynamic, thereby adapting as new issues, information and techniques become available.

## 3.2 World Bank Standards

### IFC Performance Standards

In 2006 the International Finance Corporation (IFC) released a new set of Performance Standards on Social and Environmental Sustainability. Based on the World Bank's Operational Policies these standards, which are more performance management and implementation focused, replaced the prior IFC Safeguard Policies and are now used to evaluate the social and environmental impacts of any project seeking funding through the IFC. The Equator Principles have also been revised to adhere to the new IFC Performance Standards <sup>(1)</sup>. The Performance Standards are listed in Box 1 below:

*Box 1 IFC Performance Standards*

- 
- Performance Standard 1: Social and Environmental Assessment and Management System;
  - Performance Standard 2: Labour and Working Conditions;
  - Performance Standard 3: Pollution Prevention and Abatement;
  - Performance Standard 4: Community Health, Safety and Security;
  - Performance Standard 5: Land Acquisition and Involuntary Resettlement;
  - Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management;
  - Performance Standard 7: Indigenous Peoples; and
  - Performance Standard 8: Cultural Heritage.
- 

In the IFC Sustainability Policy which accompanies the Performance Standards, IFC states its commitment to community engagement that ensure the “free, prior, and informed consultation of affected communities, leading to broad community support <sup>(2)</sup> for the project” <sup>(3)</sup>.

The Performance Standards require clients to engage with affected communities through disclosure of information, consultation, and informed participation, in a manner commensurate with the risks to and impacts on the affected communities. Performance Standard 1 (Social and Environmental Assessment and Management Systems) contains clear requirements for community engagement and as such will be a guide to Bannerman for its engagement activities. The key objectives of Performance Standard 1 are detailed in Box 2 below:

- 
- (1) A financial industry benchmark for determining, assessing and managing social & environmental risk in project financing.
- (2) Broad community support is a collection of expressions by the affected communities, through individuals or their recognised representatives, in support of the project. There may be broad support even if some individuals or groups object to the project.
- (3) IFC Policy on Social and Environmental Sustainability (paragraph 20).

## **Box 2**                    *Objectives of Performance Standard 1*

- 
- To identify and assess social and environmental impacts, both adverse and beneficial, in the project's area of influence
  - To avoid, or where avoidance is not possible, minimise, mitigate, or compensate for adverse impacts on workers, affected communities, and the environment.
  - To ensure that Interested and Affected Parties are appropriately engaged on issues that could potentially affect them.
  - To promote improved social and environmental performance for companies through the effective use of management systems.
- 

To accompany the Performance Standards, the IFC has produced a number of publications to guide good practice, notably the manual "*Doing Better Business Through Effective Public Consultation and Disclosure: A Good Practice Manual*" 1998 and the more recently produced '*Stakeholder Engagement Manual*' 2007. These manuals provide action-oriented guidelines aimed at ensuring that consultation is both effective and meaningful. The guidelines emphasize the need for the project sponsor to ensure that the public consultation process is accessible to all potentially affected parties at international, national and local levels. Emphasis is placed on the engagement of local stakeholders, namely those likely to experience the day-to-day impacts of a proposed project.

### **3.3 Bannerman Standards**

Bannerman has developed its own Environmental Policy (see Appendix A) and Social Policy (see Appendix B).

## 4. Public Consultation Process to Date

This section describes the public consultation and information disclosure undertaken during the ESIA process to date.

### 4.1 Identification of Interested and Affected Parties (IAPs)

Bannerman through ASEC has undertaken a process of stakeholder identification in order to ensure that both Namibian and international requirements are fulfilled and stakeholders are appropriately consulted.

For the purposes of this plan, a stakeholder may be defined as 'any individual or group who may have interests in or is potentially affected by a project or can themselves influence a project'. An effective stakeholder involvement programme determines exactly who the stakeholders are and understands their priorities and objectives in relation to the project. Classifying stakeholders helps to develop strategies for engagement that are tailored to meet their different needs.

It should be noted that the identification and management of stakeholders is an iterative process requiring change and regular review. As the public participation process evolved, this list of Interested and Affected Parties (IAPs) has grown and will continue to be updated throughout the construction and operation phases and the life of mine.

For the Etango Project, stakeholders have been identified and grouped based on their connections to the project, notably:

- Local and regional government – political representatives and officials
- Government Ministries – political representatives and officials
- Parastatal suppliers such as Nampower, NamWater, TransNamib, Roads Authority, NamPort
- Special interest groups: Coastal Tourism Association of Namibia and neighbouring farms
- Industry - mining companies, potential suppliers, business associations
- Other IAPs – environmental specialists and NGOs, attendees of public meetings and others who have expressed an interest in the project.

With the proposed mining area within the Namib Naukluft National Park, ASEC and Bannerman decided to regard the immediate neighbouring landowners and members of the Coastal Tourism Association of Namibia (CTAN) who are concerned that tourism may be adversely affected by the mine, as special interest groups.


### 4.2 PPP during the ESIA Scoping Phase, October 2008


#### Notifying the public

Bannerman commenced the PFS and ESIA for its Etango Project in October 2008. Through advertisements in national and local newspapers, IAPs were invited to register and comment when attending public meetings, targeted stakeholder meetings and/or by submitting comments to ASEC.

The ESIA scoping report, comprising the project outline and a number of specialist studies, was placed for public review at libraries in Swakopmund, Walvis Bay and Arandis prior to the public meetings held during the week of 13-15 October 2008.

Advertisements for the four public meetings, including a brief summary of the project (**Figure 2**), were placed in the following national and local newspapers on the given dates (**Table 3**).





**BANNERMAN**  
MINING RESOURCES NAMIBIA PTY LTD  
Reg No 2005/115

**The Etango Project**  
**A proposed new uranium mine**

**Invitation to the first Public Meetings**

Bannerman Mining Resources Namibia (Pty) Ltd (Bannerman) is conducting feasibility studies into a possible new uranium mining operation, 40km east of Swakopmund.

Bannerman has contracted A. Speiser Environmental Consultants cc (ASEC) to conduct an Environmental Impact Assessment (EIA) for the above project.

Interested and Affected Persons are invited to the first Public Meetings to be held:

Arandis:	Monday 13 <sup>th</sup> October 2008 at 13.30 at the Arandis Town Hall
Walvis Bay:	Monday 13 <sup>th</sup> October 17.30 at the Walvis Bay Town Hall, side hall.
Swakopmund:	Tuesday 14 <sup>th</sup> October at 17.30 at the Namib Primary School, Sam Nujoma Dr.
Windhoek:	Wednesday 15 <sup>th</sup> October at 17.30 at the Ministry of Mines and Energy Auditorium, Aviation Rd.

**The ESIA scoping report** is available for viewing at the following public libraries: Swakopmund library, Woermann House; Kuisebmond library and with the PRO, Walvis Bay Civic Centre; Rössing Foundation library, Arandis; and the Ministry of Mines and Energy library, Aviation Road, Windhoek.

**Brief summary of the proposed mine**

- Bannerman has been evaluating mineralisation on its exploration license since 2006.
- The Etango project area lies within the Namib-Naukluft National Park, and will be accessed from the C28 road rather than the D1991.
- The proposed mine lies beyond and east of the Goanikontes turn-off, after the main viewing points of the Moon Landscape and the Swakop River.
- The footprint of the proposed mine and associated infrastructure may be 3.5 km x 2.0 km
- The plan envisages a conventional, open cast pit approximately 1 km wide, 3km long and 300-400 m deep with uranium extraction by acid leach processing, similar to that used by Rössing.
- 5 million m<sup>3</sup> of (desalinated) water may be required annually and up to 40MW electricity of which 30% may be generated on site.
- Bannerman's policy is to comply with all relevant Namibian Laws and with World Bank/IFC Sustainability Performance Standards.
- Life expectancy of the Etango mine is 12-15+ years, with operations planned to begin in 2011.

For more details, contact: Ms Auriol Ashby: Email: [aapl@mweb.com.na](mailto:aapl@mweb.com.na), Cell: 081 240 9678

**Figure 2.** Example of advert placed in six newspapers

**Table 3.** Summary of advertisements placed in national newspapers

<b>Newspapers</b>	<b>¼ page advert, giving dates of public meetings &amp; brief summary of project (20 cm x 4 columns)</b>	<b>Advert as reminder of public meetings (approx. 17 cm x 3 columns)</b>	<b>Advert thanking public for interest and reminding them that they could still register as an IAP (approx. 8 cm x 8 columns)</b>
<i>The Namibian</i>	26 September 2008	10 October 2008	27 October 2008
<i>Die Republikein</i>	26 September 2008	10 October 2008	27 October 2008
<i>Allgemeine Zeitung</i>	26 September 2008	10 October 2008	27 October 2008
<i>Observer</i>	26 September 2008	10 October 2008	
<i>New Era</i>	26 September 2008	10 October 2008	
<i>The Namib Times</i>	26 September 2008	10 October 2008	

### **Meetings with Special Interest Groups**

Bannerman held two focus group discussions <sup>(1)</sup> with the project's neighbours and with CTAN and has taken those interested to view the proposed site by bus. This on-going engagement has afforded an opportunity for informal discussion and further points to be raised.

### **Public Meetings**

**Table 4.** First public meetings

<b>Venue and date</b>	<b>Number of participants</b>
Arandis: 13 October 2008	129
Walvis Bay: 13 October 2008	17
Swakopmund: 14 October 2008	60
Windhoek: 15 October 2008	24
Total attendance	230

Four public meetings were held and were well attended (**Table 4**). At each meeting, a presentation was given by Bannerman and by ASEC giving an outline of the project and the main findings of the scoping report to date. A summary was translated into Afrikaans at the Arandis meeting. The audience was invited to give comments, either verbally during the meeting or written on paper provided to each participant. They were also encouraged to send comments later by fax or e-mail.

Minutes of those meetings were e-mailed to all those registered interested and affected parties who had e-mail addresses on 31 October 2008. All comments received and minutes were attached to the ESIA Scoping Report. Issues raised at the public meetings were also summarised in the report.

(1) Methodology for engaging a small group with special interests in a project or programme. Usually a meeting of between 10-15 persons, during which issues are workshopped in a participatory way.

### 4.3 Updating Stakeholders in June 2009

Bannerman and ASEC felt it was important to update stakeholders and keep them informed about project developments and responses initiated through the PPP and ESIA drafting process. A progress report was circulated to all stakeholders by e-mail.

In June 2009, ASEC and Bannerman met formally with the Erongo Regional Governor and with councillors and officials of Swakopmund, Arandis and Walvis Bay. Issues raised were addressed in the draft ESIA Report.

On 16 and 17 June 2009, Bannerman and ASEC held two separate focus-group meetings with neighbours and CTAN at which an update of the project's progress was given. The meetings gave a further opportunity for IAPs to discuss their issues.

### 4.4 PPP for Draft ESIA / ESMP, October 2009

The draft ESIA, its non-technical summary, the specialist studies and the Environmental and Social Management Plans (ESMP), together with an electronic copy on CD was placed in local libraries in Arandis, Swakopmund, Windhoek and Walvis Bay. They were also available for downloading from the website: [www.asecnamibia.com](http://www.asecnamibia.com) for a month.

An invitation letter regarding the forthcoming public meetings, publicising the availability of the above documents and asking for comments, was emailed to all registered IAPs. Newspaper advertisements were placed in three national and one local newspaper: The Namibian, the Allgemeine Zeitung, the Republikein and the Namib Times (**Table 5**).

**Table 5.** Summary of advertisements placements in national newspapers

Newspapers	Dates of advert placements	¼ page advert: Advert size
The Namibian	8 and 19 October 2009	3 col x 17cms
Die Republikein	8 and 19 October 2009	3 col x 16cms
Allgemeine Zeitung	7 and 19 October 2009	3 col x 15 cms
The Namib Times	9 and 20 October 2009	3 cols x 20cm

The advert was an updated version of **Figure 2** with an updated project briefing, the addresses where the documents could be seen and downloaded, an invitation to comment and to attend the public meetings. The following public meetings were held:

Windhoek:	Tuesday 20 <sup>th</sup> October 2009 at 17.30 National Botanical Research Institute, 8 Orban St,
Arandis:	Wednesday 21 <sup>st</sup> October 2009 at 13.30 at the Arandis Town Hall
Swakopmund:	Wednesday 21 <sup>st</sup> October 17.30 at the Namib Primary School, Sam Nujoma Dr.
Walvis Bay:	Thursday 22 <sup>nd</sup> October at 17.30 at the Atlantic Hotel, 128 Sam Nujoma Ave

The public meetings were attended by a total of 90 people. A presentation of the draft ESIA and ESMP was given by Bannerman and ASEC that aimed to brief the IAPs on some of the key findings and proposed mitigation measures. A period of four weeks from placing the advertisements was allowed for comments.

The minutes of all comments and questions arising during each meeting and SMSs and the originals of all comments received by email and hard copy were attached to the ESIA Report.

#### **4.5 PPP for the EIA Scoping phase for the linear infrastructure, July 2010**

Bannerman commissioned Environmental Resource Management (ERM) and A. Speiser Environmental Consultants cc (ASEC) to conduct the EIA for all the supply routes to the mine – water, power, roads, electricity and possibly rail. In July 2010, public consultation took place for the EIA Scoping phase which is reported in detail in the EIA for linear Infrastructure.

The dates and venues for the two public meetings were advertised in three national newspapers and a local newspaper in Swakopmund and Walvis Bay. IAPs were informed by email of the upcoming public meetings and of the project intent through a three page, non-technical, Background Information Document (BID) which was distributed to all IAPs and to other stakeholders upon request.

Copies of the draft Scoping Report were made available for comment at libraries in Swakopmund, Walvis Bay and Windhoek and on the ERM website at [www.erm.com/bannerman\\_etango](http://www.erm.com/bannerman_etango).

A special focus group meeting was attended by 4 out of 11 neighbours. The public meetings were attended by 48 people in Swakopmund and 9 in Windhoek. All the minutes and comments were attached to the draft Scoping Report.

#### **4.6 Public Consultation for the draft EIA Linear Infrastructure and Amendment ESIA/ESMP Phase**

To avoid public confusion and consultation fatigue, it was decided to run the consultations for both drafts at the same time. Two Background Information Documents (BID) were compiled for each draft EIA. One outlined the linear infrastructure options and impact assessment while the other outlined the main changes to the mine's plans and the new studies which had been undertaken since the ESIA of 2009. The BIDs were widely distributed to IAPs, together with an invitation to attend two public meetings on the 23 and 24<sup>th</sup> February 2011 in Windhoek and Swakopmund respectively.

Invitations were sent to the Governor and Regional Executive Officer of the Erongo Regional Council, the mayors and CEOs of the three local councils who were asked to invite the relevant officials. Key ministries, parastatals, NGOs, specialists, mining related companies and IAPs who had attended any of the Etango Project's previous public meetings were all sent notification by email. In total 241 IAPs were notified by email (excluding those which bounced back).

In addition, newspaper advertisements were placed in the Namibian, the Allgemeine Zeitung and the Republikein newspapers on the 10 and 21 February 2011 and in the Namib Times on the 11 and 22 February 2011. The newspaper advertisement was the same in all newspapers and is reproduced in **Figure 3**.



## The Etango Project A proposed uranium mine

### Public Meetings to present Environmental and Social Impact Assessments (ESIAs) for mine amendments and its power, water & road infrastructure

Bannerman Mining Resources (Namibia) (Pty) Ltd received Environmental Clearance in March 2010 for its plans to establish the 'Etango Project' that lies 41km to the east of Swakopmund and 47km to the northeast of Walvis Bay. Bannerman is conducting an amendment to the Environmental and Social Impact Assessment (ESIA) as a result of proposed changes to the project.

The main changes to the Project are due to:

- Life of Mine increased to more than 20 years;
- Northwards expansion of Anomaly A pit incorporating Oshiveli & Onkejo deposits to a point 1.5km from the Swakop river;
- Waste rock dumps to be expanded; and
- Expanded Heap leach residue facility.

Results from expanded and additional environmental and social studies include:

- Linear infrastructure / access to mine;
- Radiation Management Plan and updated Radiation Model;
- Public Consultation and Disclosure Plan; and
- The development of a Groundwater Model and assessment.

This new information has led to some minor proposed amendments and new mitigation measures to the mine's ESIA. In addition, a draft EIA/EMP for infrastructure supply routes for water, power, rail and roads has been completed. These have been prepared by A. Speiser Environmental Consultants cc (ASEC) and Environmental Resource Management (ERM).

Interested and Affected Persons (IAPs) are invited to comment on the project amendments and attend the public meetings which will be held on:

<b>Windhoek:</b>	<b>Wednesday 23<sup>rd</sup> February 2011 at 17.30</b> at the Ministry of Mines and Energy Auditorium, Aviation Rd.
<b>Swakopmund:</b>	<b>Thursday 24<sup>th</sup> February at 17.30</b> at the Namib Primary School, Sam Nujoma Dr.

The Background Information Documents are available on: [www.erm.com/bannerman\\_etango](http://www.erm.com/bannerman_etango) and [www.asecnam.com](http://www.asecnam.com) at the following venues: Swakopmund library, Woermann House and the Ministry of Mines and Energy library, Aviation Road, Windhoek.

Please send all comments to: A. Ashby: [aapl@mwweb.com.na](mailto:aapl@mwweb.com.na) or SMS to 081 650 5071. The public consultation period runs until 10<sup>th</sup> March 2011. All comments will be recorded and addressed in the final ESIAs.

**Figure 3.** Newspaper advertisement announcing public meetings for the draft EIAs

At the two public meetings in Swakopmund and Windhoek, Bannerman, ASEC and ERM presented the main impacts and management plans of both the Amendment ESIA and the EIA for the Linear Infrastructure. Time was given for discussion and questions. In addition to the public meetings, they held a briefing meeting with the new Governor for the Erongo Region, a focus group meeting with the Coastal Tourism Association of Namibia (CTAN) and a meeting

with the immediate neighbours to the Etango Project. At each meeting, a PowerPoint presentation was given to show the main mine changes, some of the resulting new impacts and proposed mitigation measures. A total of 82 stakeholders attended these meetings; nineteen comments were received by fax, email and SMS. All minutes and comments were attached to the draft ESIA's.

#### **4.7 Issues and Concerns Raised During PPP for the draft Amendment ESIA**

The dominant concern during this phase of public consultation was the potential impacts of an uranium mine, close to popular landscape viewing points. However, many people also recognised the potential socio-economic benefits that come with a large mining venture such as the Etango Project. The Amendment ESIA detailed the questions and responses from all meetings. The issues raised can be summarised as follows:

- Environmental impacts – mining in the National Park, noise, dust, loss of bio-diversity, visual, groundwater, archaeological, pollution etc
- Radiation impacts to the public
- Cumulative impacts of several uranium mines in the region and in the National Park
- Technical/project details
- Project ownership & funding
- Infrastructural requirements (water, power)
- Public roads
- Occupational Health and Safety
- Socio-economic impacts – both positive and negative
- Mine decommissioning and closure

#### **4.8 Impact of the PPP on the Etango Project**

Bannerman has received positive comments by IAPs for its openness and willingness to communicate with them. This has fostered good relationships with stakeholders upon which Bannerman is determined to build.

It should be noted that a number of additional studies were commissioned by Bannerman in response to concerns raised during the PPP since 2008. These studies were a traffic survey of existing users of the road that will be cut-off by the mine, an economic study that compared the benefits of mining and tourism in that area and a study of dying Ana trees (*Faidherbia albida*) in the Swakop river within the exploration licence area.

Bannerman is also investigating alternative ways that the tourism industry and neighbours can continue to access the Welwitschia plains and the Swakop valley, without a long detour along the C28 route.

## 5. Future Public Consultation and Disclosure

### 5.1 Objectives of the Ongoing PCDP Programme

This Public Consultation and Disclosure Plan (PCDP) aims to ensure that people affected by the proposed mine and other stakeholders help manage risks, concerns and expectations and add value to the Etango Project through ongoing dialogue.

The objectives of the PCDP process throughout the life of mine are:

1. Project-affected stakeholders are given adequate and timely information;
2. Stakeholders are given sufficient opportunity to voice their opinions and concerns; and
3. Inputs from stakeholders influence project decisions.

### 5.2 Stakeholder Engagement Strategies

Bannerman will use the following Stakeholder Engagement strategies in its ongoing engagement throughout the life of the mine:

#### **Building trust and dialogue**

Bannerman will continue its openness for dialogue by arranging regular fora with different groups of stakeholders at appropriate venues and convenient times suggested by the IAPs. Bannerman recognises that listening and responding to IAPs' concerns is good management practice.

#### **The timeous disclosure of Information**

"The IFC recognises that the private sector has specific characteristics and operates under certain constraints, which at times make public consultation and disclosure particularly sensitive and complex. ... Information is critical to the effective participation of affected citizens near the project. An informed public will better understand the trade-offs between project benefits and disadvantages; be able to contribute meaningfully to project design; and have greater trust in its new corporate neighbours." *(IFC Good Practice Manual)*

Bannerman aims to maintain transparency and disclose important information as early as possible. It will continue to make public all the studies that it have commissioned that detail the potential impacts – beneficial and adverse – of the Etango Project. It will allow sufficient time for response and it looks forward to engaging with stakeholders to make informed decisions.

#### **Using culturally appropriate consultation methods**

Bannerman recognises that Namibia's people are diverse in terms of language groups, education levels and interests. Its methods for public consultation and disclosure will be varied and will try and reach as many interested and affected parties as possible. For example, Bannerman will ensure that a Damara>Nama speaking staff member will spend sufficient time with farm workers in the Swakop Valley that they understand the project and its potential impacts. Bannerman will continue to focus on the towns closest to the project area – Swakopmund and Walvis Bay.

## Using stakeholder engagement to inform Etango's support of community development

Bannerman is keen to enter into partnership with civil society with the aim of improving the quality of life within the communities in which it works.

Raising unrealistic expectations for benefits from the Project should be avoided. In order to manage expectations around benefits in a structured way, as plans for the mine evolve, Bannerman will engage directly with affected stakeholders, potential training partners, business partners, unions and potential recipients on priority areas for support and collaboration as part of its social responsibility programme. Regular consultation and building relationships with these stakeholders will help ensure the social responsibility programme is as focused and relevant to local needs as possible and maximises opportunities.

### 5.3 Methods for Ongoing Public Consultation and Disclosure of Project Information

Bannerman intends to build on its strategies for stakeholder engagement throughout the life of mine. The methods used will vary depending upon the topic and the target audience but core activities will include:

- i. Holding public meetings when important information becomes available; key locations for public meetings will be Windhoek, Swakopmund and Walvis Bay;
- ii. Actively seeking public comment on key documents by making document available in accessible locations at public libraries and on [www.asecnam.com](http://www.asecnam.com) and [www.erm.com/bannerman\\_etango](http://www.erm.com/bannerman_etango);
- iii. Reporting back regularly to Stakeholders/IAPs on the project's progress which will be documented in the Annual Report;
- iv. Establishing and recruiting for a dedicated role for a Public Liaison Officer (PLO) to manage ongoing consultation and grievance management;
- v. Holding regular focus group discussions with special interest groups e.g. the local tourism sector and neighbouring farms to track their opinions and concerns and monitor mitigation effectiveness;
- vi. Regular face to face meetings with other key stakeholders
- vii. Regularly updating the IAP database; and
- viii. Regularly updating the consultation and issues register, and monitoring issues raised/commitments made during consultation and engagements.

Bannerman will use a language that is appropriate and accessible to all during consultations. English will mainly be used, as it is the official language, but other local languages will also be used when appropriate.

Additional methods of information dissemination and communication may include:

- ix. Distributing information bulletins to IAPs via a newsletter and e-bulletins;

- x. Exhibition displays in public spaces in e.g. community centres and shopping centres in Swakopmund, Arandis and Walvis Bay with a spokesperson to answer questions;
- xi. Public seminars on specific topics e.g. mine closure plan;
- xii. Sending press releases and bulletins to local radio and give interviews in local languages(Oshiwambo and Nama/Damara, Afrikaans and German); and
- xiii. Placing advertisements in national and local newspapers for notices of consultations and job openings.

#### *Developing Tools and Materials for Information Dissemination*

Bannerman will produce a range of information materials to complement these stakeholder engagement and consultation activities.

### **5.4 Schedule for Public Consultations and Indicative Timetable**

The schedule of public consultation and disclosure activities is given below, together with an indicative timetable.

**Table 6. Schedule of public consultations and disclosure activities**

<b>Milestones</b>	<b>Action</b>	<b>Mechanism/target group</b>	<b>Indicative Timetable</b>
PCDP	Make draft PCDP available for comment by key stakeholders	Website disclosure in conjunction with Amendment ESIA/ESMP	March 2011
On construction go-ahead	<ul style="list-style-type: none"> <li>• Detailed review of ESMP for construction phase</li> <li>• Discuss construction management plans</li> <li>• Review PCDP and expand IAP list</li> <li>• Review performance of PLO</li> </ul>	Focus Group Discussion (FGD): Special interest groups, Town Councils, unions, MET, MME	2012
Biannual monitoring reports	<ul style="list-style-type: none"> <li>• Review construction progress of mine and linear infrastructure</li> <li>• Review impacts</li> </ul>	Site visits, FGD with special interest groups, MET, MME	2012
Prior to operations	<ul style="list-style-type: none"> <li>• Detailed review of ESMP for operations</li> <li>• Discuss management plans</li> <li>• Review PCDP and expand IAP list</li> </ul>	FGD: Special interest groups, Town Councils, MET, MME, Mineworkers Union	2014
Biannual monitoring reports	<ul style="list-style-type: none"> <li>• Review operational progress of mine and linear infrastructure</li> <li>• Review impacts</li> <li>• Review social responsibility programme</li> </ul>	Site visits, FGD with special interest groups, MET, MME	2013
Mining Licence renewal (every 3 <sup>rd</sup> year as stipulated in EMA)	<ul style="list-style-type: none"> <li>• Review operational progress of mine and linear infrastructure</li> <li>• Review impacts</li> <li>• Review social responsibility programme</li> </ul>	Site visits, FGD with special interest groups, MET, MME	2015

## **A Clear, Efficient, Coordinated Approach to Consultation and Disclosure**

In anticipation of the need to consult on EIAs and the multiple ancillary developments for the Etango Project and in the context of cumulative impacts of the number of other developments in the region, Bannerman will work to avoid stakeholder consultation fatigue and confusion by:

- Designing PPP activities to be informed by and align with the language, findings and indicators of the current SEA where ever possible;
- Communicating clearly during engagements about the Etango Project as one of a number of developments to encourage stakeholders to think holistically about the potential benefits and adverse impacts;
- Assisting stakeholders during consultation activities with visual aids and prompts to comprehend scale and nature of potential cumulative impacts and to distinguish those impacts that may be associated with Etango;
- Sharing the planned schedule of project phases in early engagements and clearly communicating the next phase or step in the development and relationship to previous steps or concurrent activities; and
- Consulting stakeholders on their preferences for both method and frequency of ongoing engagement/consultation:
  - Would the stakeholder like to be consulted at each stage of the development?
  - How often and by what method – in person, or by newsletter or e-bulletin only, project information displays with feedback forms? If in person through focus group discussions, individual meeting?
  - Which particular phases of development are of interest or concern to that stakeholder?

Bannerman will also seek opportunities where possible to maximise efficiency by combining a number of updates, or updates relating to more than one development/project component into a single meeting or set of consultation events.

## **5.5 Responsibilities and Resources**

The Board of Bannerman Resources takes overall responsibility for ensuring the PCDP is adequately resourced and implemented.

The General Manager will be responsible for its detailed implementation and responsibilities will include:

- i. Ensure Bannerman representation at all meetings with stakeholders
- ii. Respond to concerns and ideas raised through public consultation
- iii. Allocate and manage project funds for public consultation and to draw down on budgets dedicated to community development and training

- iv. Liaise with the Community Advisory Committee and Bannerman Board (see below)
- v. Ensure that all public consultation and information disclosure requirements of investors have been met, including the documentation of results.

Bannerman will establish a Swakopmund-based Bannerman Community Advisory Committee which will meet at least twice per annum. The committee will advise on community relations and on community development programmes. It will also be tasked with appointing a Third Party to resolve external grievances. The criteria for membership and its terms of reference will be drafted as part of the on-going consultations with stakeholders.

Bannerman will work in close coordination with ASEC and ERM Southern Africa which have been contracted to conduct the ESIA and the linear EIA, including the public participation process for these assessments.

ASEC is also contracted by Bannerman to conduct biannual monitoring as part of their exploration licence requirements. Once construction and operations is underway, the focus group discussions with the tourism and neighbours' special interest groups will verify the monitoring.

Currently, Bannerman operates from a local project office in Swakopmund and a managerial office in Windhoek.

Once the Etango Project has been granted a mining licence, Bannerman will appoint a Public Liaison Officer who will report directly to senior management.

## **5.6 Conflict Management**

### **Objectives and Key Principles**

Bannerman's core values with respect to conflict management are as follows:

- Bannerman believes that where possible, grievances should be resolved through facilitation rather than arbitration. The company's goal will be to seek a 'win-win' solution to any dispute that arises;
- Bannerman recognises that the long-term sustainability of investments is critically dependent on good relations with all stakeholders. The company anticipates that the on-going consultation and dialogue with stakeholders will help to identify and solve most problems and concerns as they arise while they can still be resolved in an atmosphere of trust.

Bannerman recognises that this approach will not necessarily be appropriate in all cases and are committed to establishing an additional, formal channel for the registering of complaints and concerns in line with international requirements. This mechanism will be designed to ensure all IAPs can access and use it, for example those who wish to give comment or raise concerns anonymously; whose circumstances do not allow them to attend meetings, or residents temporarily absent from the area, that may not have not been reached by Bannerman's various consultation activities.

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The IFC requires that a Project /client will respond to communities' concerns related to the project. If the client anticipates ongoing risks to or adverse impacts on affected communities, the client will establish a grievance mechanism to receive and facilitate resolution of the affected communities' concerns and grievances about the client's environmental and social performance. The grievance mechanism should:

- Be scaled to the risks and adverse impacts of the project;
- Address concerns promptly;
- Use an understandable and transparent process that is culturally appropriate and readily accessible to all segments of the affected communities and at no cost and without retribution;
- Not impede access to judicial or administrative remedies.

It also stipulates that the client should inform the affected communities about the mechanism in the course of its community engagement process.

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Two main categories of grievance are anticipated: *external grievances*, emanating from outside the company and *internal grievances* raised by employees or persons directly associated with the company. This section sets out the mechanisms to address each of these categories:

#### **External Grievance Procedure**

- i. A grievance database will be developed for registering and logging concerns raised. Data on receipt and resolution steps taken will be entered and updated regularly (each week);
- ii. A grievance form/template for the Project will be developed. The form will include at a minimum the following:
  - Name, title, affiliated organisation (if applicable) and contact details of person logging issues (telephone number, email address and postal address);
  - Date and location (if applicable) of grievance or incident concerned;
  - Short description of grievance or issue
  - Signature of complainant
- iii. Copies of the grievance form will be made available at the following locations:
  - a. The project offices in Swakopmund and Windhoek;
  - b. A site office at main entrance to site (if applicable);
  - c. On Bannerman's website (if applicable); and
  - d. In public locations attached to project documentation (if applicable).
- iv. Details of the procedure for submitting grievances will be communicated to stakeholders during consultations and in writing at the same locations to ensure comprehension of the procedure and guide use of the forms.

Box 4 describes the key steps in Bannerman's external grievance procedure:

**Box 4.**            *Key Steps in the Grievance Procedure*

- 
- Submit grievances in writing, via a third party if desired, to the Corporate Communications Officer (CCO)
  - Once a grievance is logged, the CCO will consider and or consult with, escalate to the relevant parties within the Project /Company
  - Bannerman commits to responding to all grievances registered in as short a time frame as possible. Within one week the company would have investigated the complaint and will provide the proponent of the grievance an indication of the date when a discussion can take place;
  - Where ever possible, Bannerman will seek direct contact with the proponent of the grievance (face to face if possible and by telephone if not), and their representatives if requested, to try and resolve the matter;
  - At the end of that meeting, any agreed upon action to be taken by either party should be verbally summarised and will be minuted;
  - Bannerman will keep the affected parties up to date on progress with the resolution of the grievances on a weekly basis (or at agreed regular dates) until such a time as the grievance is resolved;
  - If the actions taken are unsatisfactory by the affected party and the grievance continues to be unresolved, the company must enable the proponent to make contact with the General Manager. If this fails, a Third party can be appointed by the Bannerman Community Advisory Committee; and
  - This third party should be neutral, well-respected, and agreed upon by both the project sponsor and the affected parties. The third party will act as a mediator to the parties in an effort to resolve the dispute but will not be an arbitrator or have other powers to bind the company to a decision.
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**Internal Grievance Procedure**

Bannerman's internal grievance procedure is designed so that employees have the ability to appeal to management if they have a grievance, including if they feel they have been unfairly dealt with by the Company in respect of any disciplinary proceedings, including termination or summary dismissal.

A grievance shall be defined as any cause for complaint or protest. This may be either real or imagined and shall normally arise as a result of a decision by the Company connected with the non-compliance with the employee's terms and conditions of employment, or in the interpretation, application and violation of Company procedures.

To this end aggrieved employees should follow this procedure.

**Step 1**            Any employee that feels aggrieved by a management – or other staff member action or behaviour should raise this with his/her direct supervisor. The supervisor will attempt to solve the grievance within a period of two (2) working days.

Should the supervisor not be able to solve the grievance then Step 2 should be followed.

**Step 2** The Grievance Form is to be completed by the supervisor and the aggrieved employee. This form must be forwarded directly to the General Manager plus a HOD/Manager nominated by the aggrieved party. They will attempt to solve the grievance within a period of five (5) working days of having received the form.

**Step 3** If the grievance is not solved, it will be referred to the Managing Director whose decision is final and no appeal may be raised based on the Managing Director's decision.

### Responsibility for managing grievances

At this stage, while the company is still very small, the CCO is the contact point for externally generated grievances. The Bannerman Human Resources Department are responsible for the management of employee grievances.

## 5.7 Reporting

The draft linear EIA and EMP and draft Amendment ESIA/ESMP will be made available in March 2011. These draft reports will be made available in public libraries and on the websites [www.erm.com/bannerman\\_etango](http://www.erm.com/bannerman_etango) and [www.asecnam.com](http://www.asecnam.com), together with a non-technical, executive summary of the EA findings. A further 14 days will be allowed for comment, in addition to the 30 day period since the first advertisements were placed in February 2011.

Copies of the final ESIA's and ESMPs, which will include records of all public consultations, will be made available on the websites of ASEC and ERM. Annual monitoring will be to be carried out during the construction and operation phases of the Etango Project and the reports produced will be made available on the Bannerman website.

## 5.8 Monitoring PCDP Effectiveness

This Public Consultation and Disclosure Plan (PCDP) aims to ensure that people affected by the proposed mine and other stakeholders help manage risks, concerns and expectations and add value to the Etango Project through ongoing dialogue. Bannerman needs to monitor its progress in achieving this result for which purpose the following monitoring framework in Table 7 has been designed.

**Table 7.** Monitoring Framework to assess the effectiveness of Bannerman's consultations

Expected Impact and Results	Indicators	Source of information
People affected by the proposed mine and other stakeholders help manage risks, concerns and expectations and add value to the Etango Project through ongoing dialogue.	# meetings with stakeholders that discuss project issues	Minutes of meetings
	# stakeholder comments that are acted upon	Minutes of meetings
	# positive social, economic and/or environmental decisions resulting from stakeholder dialogues	ESIA, ESMP, MCP, PCDP, Annual reports
	Level of satisfaction (high, medium, low) of	Stakeholder

	stakeholders with results of Bannerman's consultations	surveys
<b>Results:</b> 1. Project-affected stakeholders are given adequate and timely information	# project documents available to IAPs # times IAPs are given 30 days to comment on milestone documents made public	ESIA, ESMP, MCP, PCDP, Annual reports
2. Stakeholders are given sufficient opportunity to voice their opinions and concerns; and	# IAPs reached by email, mailings # IAPs reached by adverts, posters, exhibitions (estimated) # IAPs attending consultation events # meetings with stakeholders that discuss project issues	ASEC, ERM and Bannerman reports Minutes
3. Inputs from stakeholders influence project decisions.	# stakeholder comments that are acted upon Average response time and or period before resolution?	ASEC, ERM and Bannerman reports Grievance database

Monitoring results will be used to apply lessons learned, by regularly updating the PCDP, improving engagement and consultation methods and or implementing corrective actions where required. A Review checklist for improving public consultation is attached in Appendix B.

In order to deliver this continuous learning and improvement, Bannerman has contracted ASEC to conduct biannual monitoring as part of their exploration licence obligations to the GRN.

For quality assurance the ESIA / ESMP has been peer reviewed by the Southern African Institute for Environmental Assessment.

# Appendix A Bannerman Resources Limited Environmental Policy



## Environmental Policy

### Our Vision

To conduct our activities in a manner which shows that we care for the environment.

### Our Approach

- We take a proactive approach to managing our environmental footprint through effective risk management.
- Everyone works to foster a culture of caring for the environment through leadership, cooperation, participation and consultation.
- The Board and Management provide visible leadership and resources, including training and development for managing our environmental footprint.
- We establish clear individual environmental accountabilities, and incorporate environmental performance in individual performance evaluations.
- We integrate our environmental management system into our day-to-day operations.
- We expect our contractors to embrace our approach to environmental management.
- We strive to continuously improve our environmental performance.
- We shall consult and communicate regularly on our activities with our stakeholders.

### Our Commitment

To collectively strive to create a culture where we manage work-related environmental risks and seek to continuously improve our environmental performance.

A handwritten signature in black ink, appearing to read "David Smith", written over a horizontal line.

David Smith  
Chairman

5<sup>th</sup> May 2010

A handwritten signature in black ink, appearing to read "Len Jubber", written over a horizontal line.

Len Jubber  
Chief Executive Officer

5<sup>th</sup> May 2010



## Appendix B Bannerman Resources Limited Social Policy



### Social Policy

#### Our Vision

To build enduring and mutually beneficial relationships with our neighbouring communities.

#### Our Approach

- We treat people with decency and respect.
- We strive to provide a healthy and safe workplace where our people can develop to the full extent of their abilities.
- Our employees participate in the Company's community relations endeavours.
- We strive to build relationships with our stakeholders through fostering participation, mutual respect and long term commitment.
- We consult with the respective stakeholders to ensure that our social responsibility activities are aligned with community priorities as stated in the national, regional and local development plans.
- We support best practices and responsible behaviour throughout the nuclear fuel cycle.
- We shall consult and communicate regularly on our activities with our stakeholders.

#### Our Commitment

To collectively strive to create a sustainable benefit from our business activities.

A handwritten signature in black ink, appearing to read "David Smith", written over a horizontal line.

David Smith  
Chairman

5<sup>th</sup> May 2010

A handwritten signature in black ink, appearing to read "Len Jubber", written over a horizontal line.

Len Jubber  
Chief Executive Officer

5<sup>th</sup> May 2010



## Appendix C Frequently Asked Questions

The main aspects raised by IAPs during the ESIA process were summarised in the ESIA, together with the response. **Table A** is summary of the most commonly asked questions during the public consultations to date.

**Table A Frequently Asked Questions**

Question /Concern	Response
1. How will noise from 24/7 mining activities impact on the desert environment?	A noise impact study has been conducted and made recommendations on ways to reduce the impact.
2. Rehabilitation of the desert.	Rehabilitation has been a Bannerman priority during this exploration stage and will be an on-going commitment.
3. Cumulative impact of several uranium mines; The National Park is being compromised and there will be a permanent loss of sense of place.	Bannerman will follow the recommendations of the regional Strategic Environmental Assessment and will aim to mitigate and minimise impacts as far as possible.
4. What are your plans to utilise other deposits in the Exploration Licence area?	Exploration within the EPL will continue during the Life of Mine.
5. Health and Safety concerns regarding dust and exposure to radiation.	Bannerman will follow the IAIA and WNA guidelines regarding all health aspects, including dust and radiation.
6. Source of water supplies for construction and mining operations.	Bannerman is talking with LHU, RUL & Areva for construction period. Bannerman will only use desalinated water during operations;
7. Impact of increased traffic and closure of D1991 beyond the Goanikontes turn-off.	A traffic baseline count has been undertaken. Bannerman is consulting with the relevant stakeholders and special interest groups;
8. Size of workforce	Up to 1500 during construction and 944 during operations, including contractors; Bannerman will build up for operation phase during construction;
9. Local labour component and use of SMEs to maximise local benefits	Bannerman will encourage the construction company to source locally; It will outsource non-core uranium mining business; It is committed to training in different skills;
10. Housing during construction and operations	Bannerman will request MET and ERC to have a construction camp in the mining area; It is anticipated that most workers will choose to live in the closest town – Swakopmund and Bannerman intends to discuss housing strategies with the Town Council.
11. Impact of the mine on tourism	Bannerman is having ongoing dialogue with CTAN.
12. Is there a mine closure plan and do you have a fund for decommissioning?	We support the Chamber of Mines closure framework. We will follow the Australian and North American model of putting down a cash-backed bond on account at a bank, with enough money for rehabilitation, based on each year's requirements.

## Appendix D Review Checklist for Improving Public Consultation

Objectives of public consultation already achieved?	YES	Suggested improvements
1. Stakeholder identification: Is Bannerman aware of all the groups and individuals who will be directly affected by the social or environmental impacts of the project, and all those individuals and organizations who can contribute to, or hinder, the success of the project?	YES	Hold further meetings with community stakeholders, unions, training partners
2. Impact identification: Have all environmental and social impacts of significance to the local population and other stakeholders been assessed during the ESIA process, including the indirect social impacts of changes to the biophysical population?	YES	Further specialist studies are on-going and their findings in the draft ESIA's will be made available for public comment.
3. Mitigation options: Have a wide range of compensation and mitigation options been presented to, and solicited from, the affected population?	YES	The draft Amendment ESMP and the linear infrastructure EMP will be discussed with IAPs
4. Economic livelihoods: Are the economic livelihood potential and social well-being of the project-affected groups comparable to or better than what they were before the project?	YES for most IAPs	Bannerman is continuing to meet with neighbours to discuss mitigation measures
5. The draft EA report: Have the draft ESIA report and ESMP been released to the public within Namibia, and has the sponsor solicited responses to them through consultations?	YES	The draft Amendment ESIA and ESMP have been discussed and IAPs have made valuable input which is documented in the Amendment ESIA submitted to GRN.
6. Design changes: Are those affected by the project being kept informed of changes in the project design, construction activities, and operations as they arise?	YES	IAPs will continue to be updated and kept informed
7. Monitoring: Are project-affected groups involved in monitoring the effectiveness of environmental and social impact mitigation?	YES	Additional special interest groups (now tourism association and neighbours) will be formed to include potential employees
8. Community development: Is the project sponsor working to promote local development within the wider community?	YES	Bursaries will be expanded; has established community development programme