

STAKEHOLDER ENGAGEMENT PLAN

DISCLOSURE OF 2019 REVISED ENVIRONMENTAL AND SOCIAL
IMPACT ASSESSMENT FOR THE PROPOSED TSUMEB EXPANSION

PROJECT

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1. INTRODUCTION

Since February 2019 the Environmental and Social Impact Assessment Report (ESIA) for the proposed Tsumeb Expansion Project has been further updated and aligned with the (ESIA) and Environmental and Social Management Plan (ESMP) with the Environmental and Social Performance Requirements (PRs) of Dundee Precious Metal’s investor, the European Bank for Reconstruction and Development (EBRD). This Stakeholder Engagement Plan (SEP) outlines the steps that will be taken to communicate and disclose the 2019 revised ESIA to stakeholders.

The 2019 Revised ESIA will be made available to all the registered stakeholders (also referred to in the ESIA as “Interested and Affected Parties”), and comments will be reflected in the updated Issues and Responses Report prior to submission to the Department of Environmental Affairs (DEA) for decision making. Comments received after submission to the DEA will either be reflected in the Post DEA Submission Issues and Response Report or will be managed through the Dundee Precious Metals Tsumeb (DPMT) Receiving Suggestion, Opinions and Grievances Procedure, depending on the timing of the comments received.

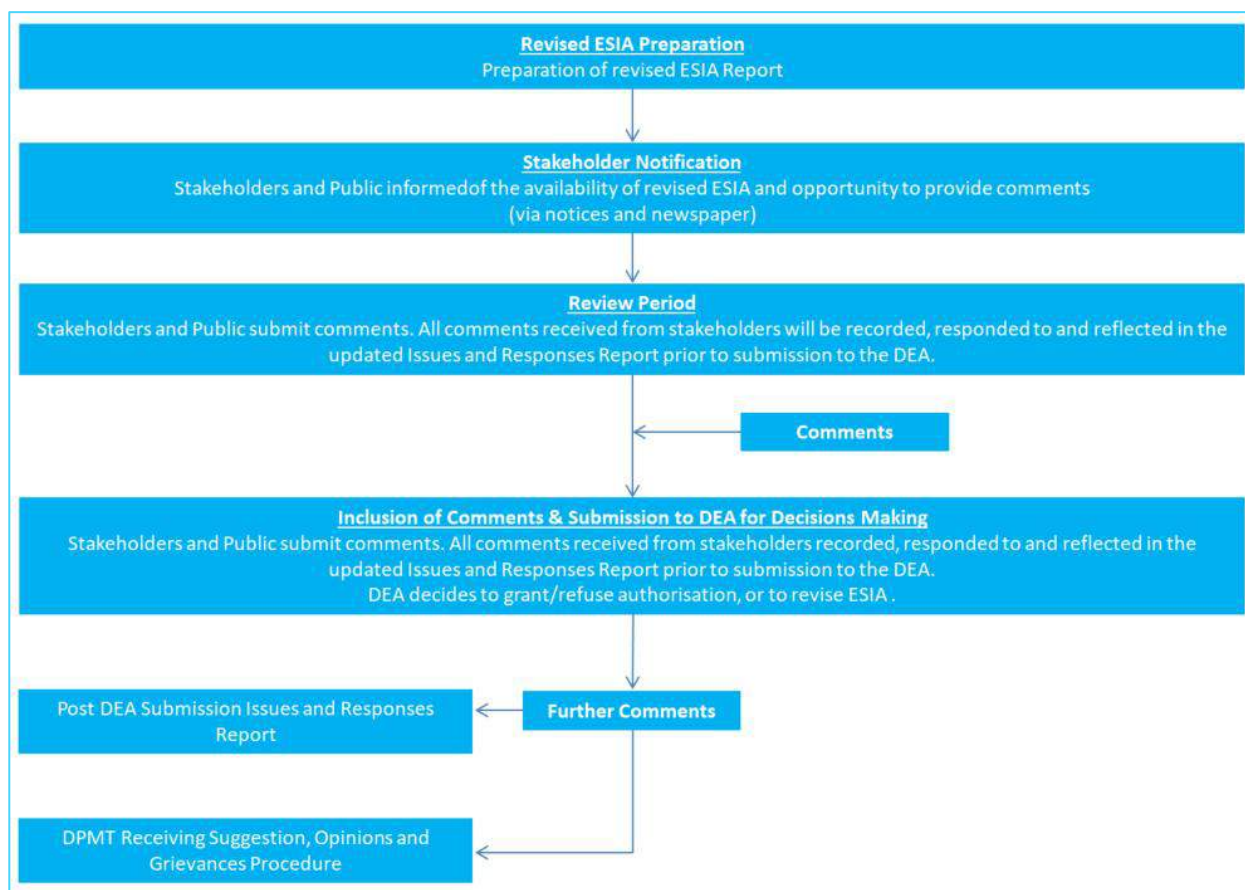


Figure 1: Summary of disclosure and stakeholder engagement process for the 2019 Revised ESIA

2. LEGAL & POLICY FRAMEWORK

The Namibian Environmental Impact Assessment Regulations: Environmental Management Act, 2007 allow a registered interested or affected party to comment on any final report where the report contains substantive information which has not previously been made available, and to ensure that the comments of interested and affected parties are recorded in reports submitted to the DEA. Hence the disclosure of this revised ESIA report.

In addition, DPM strives to meet international good practice regarding disclosure and transparent stakeholder engagement, including the European Bank for Reconstruction and Development EBRD's Performance Requirements (PRs). The EBRD's PR 10: Information Disclosure and Stakeholder Engagement sets out the importance of an open and transparent engagement between the client, workers, local communities directly affected by a project and other stakeholders as an essential element of good international practice and corporate citizenship.

Under PR 10, EBRD requires that stakeholder engagement is an ongoing process which involves:

- public disclosure of appropriate information so as to enable meaningful consultation with stakeholders (this will be achieved as described in Section 5);
- meaningful consultation with potentially affected parties (this will be achieved through the comments and responses period); and
- a procedure or policy by which people can make comments or complaints (this will be achieved as described in Section 6).

3. IDENTIFICATION OF STAKEHOLDERS

The Scoping and ESIA process for this Project has been ongoing since 2016, and during that time various public engagements have been undertaken. More information on these engagements is provided in Section 2.4 (Public Participation) of the ESIA report. As a result a comprehensive Stakeholder Database has been developed (Annexure A). The Stakeholder Database was updated during March 2019 and is therefore deemed suitable for the purpose of this SEP. The stakeholders identified represent the following groups:

- Authorities;
- Landowners;
- Businesses;
- Ondundu Residents;
- Nomtsoub Residents;
- Civil Society/NGOs;
- Media;
- DPMT Customers;
- DPMT Employees;
- Unions;
- School of Public Health; and
- Private.

4. COMMUNICATION AND CONSULTATION

Stakeholders will be notified about the 2019 revised ESIA as follows:

- Via email for those individuals with email addresses;
- Via sms for those individuals with mobile phone, but no email address;
- Via letters for those individuals with postal addresses, but no email access or mobile;
- Physical/verbal communication by the Social Performance Department for those individuals without email/internet access, mobile phone or a postal address (e.g. general announcements, distribution of info sheets, etc.).

In addition, the Social Performance Department will ensure that community leaders of all the communities bordering the Tsumeb operations are notified.

In addition, DPMT will place a notice in "The Namibian" newspaper informing the general public of the availability of revised ESIA and opportunity to provide comments.

Proof of all notifications will be maintained.

5. INFORMATION DISCLOSURE

All of the stakeholders on the Stakeholder Database will be notified and provided with an opportunity to comment on the 2019 Revised ESIA. The 2019 Revised ESIA will be available for minimum period of 14 days, starting from 03 July 2019 until 16 July 2019. This is longer than the statutory period of 7 days as stipulated in the regulations.

The 2019 Revised ESIA will be made available at the following locations:

- DPMT Info Centre;
- Tsumeb Local Library;
- DPMT website (<https://www.dundeeprecious.com/English/Operating-Regions/Current-Operations/Tsumeb/Documents/default.aspx>); and
- SLR website (<https://slrconsulting.com/za/slr-documents>)

The 2019 Revised ESIA will be submitted to the DEA for decision making before the end of July 2019. All comments received from stakeholders will be recorded, responded to and reflected in the updated Issues and Responses Report (Appendix C of the ESIA) prior to submission to the DEA.

Further comments received after submission, and prior to DEA decision making, will be recorded and reflected in a “Post DEA Submission Issues and Responses Report” which will be made available on the DPMT and SLR websites.

Comments can also be submitted to DPMT after DEA decision making, and this will be managed according to the DPMT Receiving Suggestion, Opinions and Grievances Procedure as described in Section 6 below.

6. GRIEVANCE MECHANISM

DPMT has a Receiving Suggestion, Opinions and Grievances Procedure that sets out the process of receiving opinions, suggestions and grievances from external stakeholders and shall be coordinated and managed by the Social Performance Department. An overview of the process is provided below:

Table 1: Overview of DPMT Receiving Suggestion, Opinions and Grievances Procedure

<i>Steps</i>	<i>Description</i>
1. Submission of opinions, suggestions and grievances	Opinions, suggestions and grievances can be submitted in one of the following ways: <ul style="list-style-type: none"> • During regular meetings that the Company holds in the local community; • Through the local public consultative forums in the affected areas; • During formal and informal meetings with the stakeholders; • By direct communication with management - for example, by a letter addressed to local management or other offices at P O Box 936, Tsumeb; • Direct email to Social Performance Department – f.mubiana@dundeeprecious.com; • By Phone +264 (67) 2234557 or 0811286920; • Through the suggestion and complaint register book located at the Dundee Precious Metals Information Center located at: 1549, Dr. Sam Nujoma Drive, Tsumeb. • By personal contact with the Social Performance Advisor
2. Opinions, suggestions and grievances registration	The registration of opinions, suggestions and grievances is done within 24 hours of correspondence receipt. The Social Performance Advisor records the received opinions, suggestions or grievances in the Grievances Register and informs the Senior Manager: Social Performance and or relevant departmental heads.
3. Classification of the type	The Social Performance shall undertake:

Steps	Description
and severity of the grievance	<ul style="list-style-type: none"> • Preliminary review and rank based on the company Incident Classification, Investigation and Reporting Standard; • Evaluate whether the issue qualifies to be admitted into the formal grievances mechanism process; • Rank the severity of the issue raised by the grievance and the corresponding timeline for response; and • Undertake process to identify the operational department responsible for leading the investigation.
4. Providing an initial response	<p>The Social Performance Advisor will provide an initial response letter which:</p> <ul style="list-style-type: none"> • Communicates the eligibility for consideration in the grievances mechanism; • Describe the grievance process steps and timelines for resolution; • Communicate alternatives if the grievance is not eligible for the formal grievances mechanism process; and • The responsible person/department for taking next steps and implementation deadlines.
5. Grievance/suggestion review/investigation team	<p>A received suggestion/grievance shall be reviewed by:</p> <ul style="list-style-type: none"> • Senior Manager: Social Performance; • The Manager to whose area of expertise is referred to in the grievance/suggestion; • Departmental Exco Director; and/or • MD when there are any financial or other obligations to the Company.
6. Investigation of the grievance to identify what occurred, and the root and contributing causes	<p>The respective competent manager shall acquaint him/herself thoroughly with the grievance – he/she shall identify the grounds for the grievance, assign investigations, and undertake all necessary actions for finding the root cause.</p> <p>Informal and formal investigative process to be applied following the DPMT Grievance Flow Chart.</p> <p>The investigations to adhere to the Dignity and Respect, and Transparency in-line with the company core values.</p> <p>In some cases, there will be consideration for involvement of aggrieved party or other trusted community members or neutral third parties.</p>
7. Response to the complainant	<p>Response shall be discussed and agreed to internally by the DPMT Social Performance Department.</p> <p>Response shall be signed off by the MD or delegated Exco Member.</p> <p>The Senior Manager: Social Performance shall give the prepared response to the complainant detailing:</p> <ul style="list-style-type: none"> • Process since grievance received; • Presenting results of the investigation; • Presenting the proposed resolution; • Seek feedback from the aggrieved party; • Consider how feedback can modify the agreed path forward; and • Reiterate alternative mechanisms if aggrieved party is unsatisfied.
8. Closure / solution of the grievance	<p>The Senior Manager: Social Performance shall close out and sign off on the grievance process, resolution and corrective actions shall:</p> <ul style="list-style-type: none"> • Seek agreement from aggrieved party on proposed resolution • Seek sign off or acknowledgement on the solution and on the process.
9. Monitor the corrective actions to ensure they are completed and effective	<p>The Senior Manager: Social Performance shall confirm that agreed response is being implemented and addresses the issue identified by the grievance.</p>
10. Report both internally and externally	<p>Social Performance Advisor shall report internally to identify preventative steps.</p> <p>The Senior Manager: Social Performance shall report externally (through the DPM Annual Stakeholder Report) to build trust and legitimacy of the process.</p>
11. Follow-up in unresolved cases	<p>In cases where the complaint remains unresolved, the Senior Manager: Social Performance is to continue the review process, to reach a solution satisfying stakeholders.</p>
12. Register and	<p>After registration of suggestion or grievance, the sender of the comment receives a copy of</p>

Steps	Description
documentation control	<p>Received Grievances Register Form on request by the sender.</p> <p>The Social Performance Advisor is the main contact person for replying to the sender of all received opinions, suggestions and grievances.</p> <p>All Received Grievances Register Forms, as well as follow-up answers and solutions shall be documented by the Social Performance Advisor.</p> <p>The original forms shall be stored by the Social Performance Advisor in the Company Departmental Z Drive.</p> <p>The Social Performance Advisor shall keep all the hard copies on file; and the electronic formats on the Departmental Z Drive on DPM Server, together with all supporting documentation (such as written statements, photos and reports from investigations).</p>

7. ON-GOING ENGAGEMENT

7.1 COMMUNITY CONSULTATION FORUM

To ensure effective consultation with community members during construction and operation of the Project, DPMT will establish a Community Consultation Forum (CCF) that will comprise elected community representatives, and aims to disseminate project information to community members.

DPMT will request communities to democratically elect representatives to voluntarily sit on the Forum, which meets quarterly. Representatives would be responsible for disseminating project information to community members, and DPMT would be responsible for taking minutes and attendance registers at Forum meetings.

The composition of the Forum might include the following Committee members:

- Community members from the communities within the Projects area of interest;
- Representatives from the Municipal Authorities; and
- DPMT’s Community Relations Department.

The CCF comprises a membership of persons that might be elected every six months. Committee members would be required to hold meetings with their communities, and provide DPMT with copies of the attendance registers and minutes of these meetings.

For the CCF to be effective, elected forum members will be required to participate in training workshops and capacity amongst CCF members will be built to allow effective participation in meetings.

The venue for forum meetings will rotate amongst communities using a pre-agreed schedule determined at an inaugural meeting held at a location to be determined by DPMT. Each community would then have a turn to hold a forum meeting, and forum members would be transported by DPMT to the various meeting venues.

7.2 NOTICE BOARDS

Notice boards are an effective mechanism to inform literate audiences, and will be used by DPMT to inform community members about the Project activities. Selecting the best location for the notice boards should be done in consultation with community members.

These notice boards will be regularly updated with Project information and used to inform community members about project activities, employment opportunities and impact management measures including the grievance mechanism. Noticeboards will also contain information on the DPMT Receiving Suggestion, Opinions and Grievances Procedure.

ANNEXURE A: STAKEHOLDER DATABASE

Table 2: Stakeholder Database for Authorities

AUTHORITIES	
INTEREST	CONTACT PERSON
Chairperson of the Management Committee, Tsumeb Local Municipality	Ndangi Linekela Shetekela (2016) Mr Peter Shaanika (current)
Mayor Tsumeb Local Authority	Mrs Veeza Kasiringua (2016/7) Mr Mathews Hangula
Chief Executive Officer, Tsumeb Local Municipality	Mr Alfeus Benjamin (2016/7) Acting CEO Ms Caroline Damaseb (current)
Tsumeb Municipality	Karolina E Damaseb
Tsumeb Municipality	Glenn E Kearns
Tsumeb Municipality	Mr Hendrick Shikongo
Tsumeb Municipality	Mr Lemmy Geinbob
Councillor, Tsumeb Local Municipality	Mr D K Venaani
President	HE Dr Hage Geingob
Deputy Prime Minister's Office	Hon. Netumbo Ndaitwa, MP
Ministry of Environment & Tourism	Deputy Environmental Commissioner, Dr Freddy Sikabonga
Ministry of Environment & Tourism	Executive Director, Mr Theofilus Nghitila
Ministry of Health & Social Services	Dr Ali, Chief Medical Officer
Ministry of Labour, Industrial Relations & Employment Creation	Hon. Erkki Nghimtina, MP or Chief Labour Inspector Occupational Health & Safety Mr Sebastian Kapeng
Ministry of Agriculture, Water & Forestry	Elizabeth Mbandeka
Ministry of Industrialization, Trade and SME Development	Hon. Tjekero Tweya, MP
Ministry of Finance	Hon. Calle Schlettwein, MP
Ministry of Information and Communication Technology	Hon. Engel Nawatiseb, MP, Deputy Minister
Ministry of Poverty Eradication	Bishop Zephania Kameeta
Nampower	Acting MD Kahenge Simson Haulofu Board Chairperson Maria Nakale
Transnamib	Station Master, - - Hippy Chivikua
Regional Governor's Office	Hon. Kankoshi, Reg. Councillors
Namibian Ambassador in Washington	Martin Andjaba, Ambassador, Washington

Table 3: Stakeholder Database for Other Groups, Landowners & Businesses

OTHER GROUPS/LANDOWNERS/BUSINESSES	
INTEREST	CONTACT PERSON
Gate Way Holdings (pty) Ltd	Rudi Colesky
Private	Gustave Heins
Private (next to smelter)	Andre Neethling
Private	Irma Neethling
Private	Marinda Pretorius
Private, Tsumeb private hospital & OHP	Pieter Pretorius

OTHER GROUPS/LANDOWNERS/BUSINESSES	
INTEREST	CONTACT PERSON
EOH Health - NCS	Dr Fiona Robinson
DPMT	Violine Kavindjima
NCS	Florence Williams
Roads Authority Natis Tsumeb	Mr. Julius Antonius
G.P	Sigi Basson
Nailoke Solar house	Nailoke Niingungo
SDFN	Juliana Semses
Rubicon Security Services	Rudi Vaessler
Manager, Debonairs & Steers	Mr Tobias Mwapopi
Owner Trek Petrol and Copper Guest House	Mr Arnaldo Silvano Martins
Business owner	Mrs Maggie Mulundu
Resident and OHS specialist	Dr Pieter Pretorius
Employee, DPMT	Mr Max Tietz
Employee, DPMT	Mr Isai Nekundi
Employee, DPMT	Mr Nico Potgieter
Manager Afrox	Mr M Scholtz
Resident, Woodtec Joinery	Ms Letitia A van Wyk
Resident, Megabuild	Ms Louise Liebenberg
Resident, Megabuild	Mr McLean Willemse
Resident, MVF Health	Mr Ruusa N. Sakarias
Owner Makalani Hotel	Mr A K Zorganas
Tulipamwe Catering Services	Christie Mentz
Gateway holdings & industries	Daleen Boshoff
ABA Architect	C Mtshana
ABA Architect	Nm V. Wyk
ABA Architect	Adolf Botes
ABA Architect	Teta Tapiwa
ABA Architect	Brian Muzwembiri
Tsumeb Gimnasium Private School	Wouter Niehaus
Goal Maize	Rensche Madderson
Tsumeb Farmers Association	Juanita Keyser
NAMFO	Thilo Himmel
ONDUNDU RESIDENTS	Klementine Kanjaku
	Louisa Hanes
	Sakaria Kariseb
	Teopolina Kambuli
	Louisa Kadheba
	Matias Welama
	Resident
	Hans Dai-Gaib
	Ludwig Williams
	Peter Kambuli
	Sakaria Pinahs
	K Simon
	Johannes Namutenga

OTHER GROUPS/LANDOWNERS/BUSINESSES	
INTEREST	CONTACT PERSON
	Genti Kanataus
	Monika Heibes
	Tobias Mwapopi
	Klaudia Naboka
	Emmanuel Hiebieb
	William Pienas
	Rita Mongabes
	Elfriede Soroes
	Christina Hanes
	Rosa Khaibes
	Noleshi Shahonya
	Rosalia Matheus
	Paulus Helaria
	David Elias
	Silas M
	Paulus David
	Lakale Victa
	Kristofina Manda
	Lukas Lukas
	Naemi Lukas
	Salom Shafokutya
	Makozo Joseph
	Lina Shinuna
	Lottie Mukozo
	Immanuel Lukas
	Emilia Haihambo
	Emilia Timoteus
	Halweendo Anania
	Job Nawinda
	Morgena Geingos
	Paisley Clirab
	Sakaria Tjingwari
	Trestande Amuganga
NOMTSOUB RESIDENTS	Amon Gabriel
	Peter Nanghama
	Moses Awiseb
	Julia Antonio
	Tomas Namwandi
	John Kanema
	Abisai Penehafo
	Teofilus Nhishoono
	Nikasius Shifeleni

OTHER GROUPS/LANDOWNERS/BUSINESSES	
INTEREST	CONTACT PERSON
	David Johannes
	Claudia Dausas
	David Johannes
	Elfriede Garises
	Elizabeth Guios
	Emilia Abisai
	Julius Gaebeb Cnl.
	Isay Naseb
	Alberes Kamore
	Josef Awaseb
	Sarie Hodes
	Victoria Damases
	Marius Shikongo
	Eradiny Abraham
	Josef David
	Belinda Tjitzimunisa
	Musese Tyameya
	Mushongo Shifafure
	Helena Tjizao
	Josia Shilumbu
	Ismael Angula
	Albert Neidel
	Aletta Garises
	Amon Horaseb
	Titus Goachab
	Emma Kambengulu
	Ester Awises
	Evangeline Maris
	Fillipina Uwulchaes
	Gabriet Uri-Khob
	Germanus Uudindi
	Haraes Adeltroud
	Inguela Iiyambo
	Isaskou Aunt
	Jacky Hamases
	Johannes Kalola
	Landine Mazuva
	Landine Oxurus
	Laurencia Neis
	Lovisa N Iiyambo
	Mekondjo Johannes
	Lusia Naibes
	Menisia Nepembe
	M Wathali
	Natalia Garises

OTHER GROUPS/LANDOWNERS/BUSINESSES	
INTEREST	CONTACT PERSON
	Oscar Kakungha
	Petronella Neibes
	Regina Naibas
	Salatiel Katunohange
	Samson Mulonga
	Sara Khaindbas
	Sylvia T Nimengobe
	Talishi Jacob
	Titus Katunohange
	Tuyenikela Haiduwa
	Veronica Nases
	Victoria Nases
	Willem Muronga
Zitu Vatilifa	
CIVIL SOCIETY/NGO	
Earth Life Namibia	Bertchen Kochs
Traditional authorities - Tribal Leaders	Carel Oaeseb, Traditional Chief
TCCC	Moses Awiseb, Community activist
Law Centre of Namibia	Corinna v Wyk
BankWatch	Genady Kondarev
THEAN	Marcus Gillman
MEDIA	
The Villager/Prime Focus	Tiri Masawi, Managing editor
	Linekela Halwoodi, Journalist & Editor
Republikein	Dani Booysen
Confidente	Max Hamata
Namibian Sun	Festus Nakatana
	Denver Isaacs
NAMPA	Jata Kazondu
New Era Newspaper	Chrispin Inambao
	Carlos Kambaekwa
Etosha Corporate Agenda Newsletter	Hon. Engel Nawatiseb
Informante	Nghidipo Nangolo
	Michael Uugwanga
Windhoek Observer	Kuvee Kanguuhi
	Rochelle Neidel
Namibia Economist	Daniel Steinmann
	Mandisa Rasmeni
The Namibian	Tangeni Amupadhi
	Wonder Guchu
Algemeine Zeitung	Stephan Fischer
	Bianca Ahrens
DPMT CUSTOMERS	
Lonza (previously Arch) - South Africa (arsenic trioxide)	K Govender

OTHER GROUPS/LANDOWNERS/BUSINESSES	
INTEREST	CONTACT PERSON
Ancom Chemicals - Malaysia (arsenic trioxide)	Lee Cheun Wei
Rossing (acid)	MD, Werner Duvenhage New MD – Richard Storrie
UNIONS	
Current Employees	Selected few, balanced quarter
Mineworkers Union (MUN)	Eben Zaarondo, General Secretary.
Namibia National Labour Union	Evaristus Kaaronda, General Secretary
MUN - Branch Executive Committee (BEC)	Chairman & Secretary, Christian Tjamba, Leonard Kwenda
National Union of Namibian Workers	NUNW President Ismael Kasuto
	Secretary General Job Muniaro
SCHOOL OF PUBLIC HEALTH	
Dean of School	Dr Mitonga
Student	Anna Shilunga
Student	Olivia Nakwafila
Student	Ooni Haggayi
Student	Penehafo Ndeshipanda
Student	Indileni Hamukoto
Student	Kinkdjai Uugwanga
DUNDEE PRECIOUS METALS	
Employee	Alexia Hoeses
Employee	Leani Swanepoel
Employee	Z Kasete
Employee	H Zandberg
Employee	E Sichone
Employee	E Sipunga
Employee	A Garises
Employee	I Liyambo
Employee	S January
Employee	M Trust
Employee	M Hattingh
Employee	J Heiser
Employee	B Kruger
Employee	B Plaatjies
Employee	Bruce Mcleroth
Employee	Benedicta Uris
OTHER	
PRIVATE	William Skinner
	Hans Nolte
	Ludwig Matthysen
	Stephen O'Rahilly

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