APPLICATION TO PROSPECT FOR OIL & NATURAL GAS IN THE HURUNGWE SAFARI AREA, ZAMBEZI VALLEY – THE ZAMBEZI SOCIETY OBJECTS

On 19 May 2023, The Zambezi Society, along with many other concerned stakeholders, filed an official letter of objection to the Secretary of the Mining Affairs Board of Zimbabwe regarding an application by a company called Shalom Mining Corporation (Pvt Ltd) to prospect for petrolium oil and gas within a defined area of approximately 130,000 hectares, west of Mana Pools National Park and covering parts of the Hurungwe and Rifa Safari Areas the town of Chirundu and sections of the Zambezi and Ruckomechi Rivers.

The Zambezi's Society's objection letter was copied to:- The Minister, Deputy Minister and Permanent Secretary of Zimbabwe's Ministry of Environment, Climate, Tourism and Hospitality Industry; the Director General and key management of the Zimbabwe Parks & Wildlife Management Authority (ZPWMA), and key officials and decision-makers of UNESCO, RAMSAR and IUCN.

The objection letter is reproduced below:-

1 Introduction

1.1 INTRODUCTION:

General Notice 608 of 2023 of the Mines & Minerals Act (Chapter 21.05) dated 28 April 2023 refers, being a notification of application for Exclusive Prospective Order No 26 of 2022 in the Mashonaland West Mining District with description of the area being "Mana Pools". For the avoidance of doubt this is contained in the EPO Application map as number 26/22 but we also object to 35/22.

MINES AND MINERALS ACT [CHAPTER 21 05]

Application for Exclusive Prospective Order No. 26 of 2022: Mashonaland West Mining District

IT is hereby notified, in terms of section 87(4) of the Mines and Minerals Act [Chapter 21:05] that Shalom Mining Corporation (Private) Limited has applied to the Mining Affairs Board for an exclusive prospecting order, over an area described in the Schedule, in the Mashonaland West Mining District, in relation to map reference Kariba SE-35-4 Edition 3 and Mana Pools SD-35-16 Edition 3 of the scale 1: 250 000, produced by the Surveyor-General.

The applicant intends to prospect for Petroleum oil and Natural gas within the area which has been reserved against prospecting pending determination of this application. Prospecting authority is sought upon registered base mineral blocks within the reservation.

Any person wishing to lodge any objection to the granting of this application should do so in writing with the Secretary, Mining Affairs Board, Private Bag 7709, Causeway, within twenty-one (21) days from the date of publication of this notice.

P. KUNAKA.

28-4-2023.

Chairman, Mining Affairs Bo

DESCRIPTION OF THE AREA

"Mana Pools"

An area of approximately 130 000 hectares in extent, situate in Mashonaland West Provincial Mining District, bound by a line commencing at a point which is on the Zimbabwe Zambia International boundary (grid reference 35KQN 730000/8250000):

thence proceeding on a true bearing of approximately 135 degrees for a distance of approximately 28 kilometres to a point (grid reference 35KQN750000/8230000;

thence on a true bearing of approximately 225 degrees for a distance of approximately 28 kilometres to a point (grid reference 35KQN7300008210000);

thence on a true bearing of approximately 270 degrees for a distance of approximately 33.3 kilometres to a point on the Zimbabwe Zambia International boundary (grid reference 35KPN696700/8210000);

thence following the Zimbabwe and Zambia International boundary in a north easterly direction for approximately 59 kilometres to the statting point.

The co-ordinates provided in the application for Exclusive Prospective Order (EPO) have been mapped by an expert at the request of The Zambezi Society. The resulting map shown in Figure 1 below shows that the application for prospecting target area falls within the Nyakasanga, Chirundu and Rifa sections of the Hurungwe Safari Area, a protected area designated as such in the Parks & Wildlife Act. The target area falls near the middle of the larger Middle Zambezi Biosphere Reserve (Figure 2 below refers).

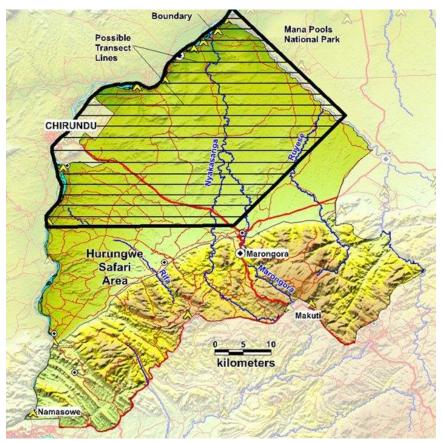


Figure 1. Map showing the target area drawn using the co-ordinates provided in the Application for Exclusive Prospective Order No 26 of 2022

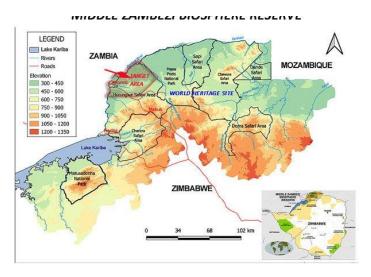


Figure 2. The Middle Zambezi Biosphere Reserve showing the target area

The **Middle Zambezi Biosphere Reserve** covers an area of approximately 3,400,000 ha (34,000 km2) and was designated by UNESCO under its Man and Biosphere programme in 2010 for its ability to sustainably conserve biodiversity in a manner that achieves long-term environmental, economic and social benefits for Zimbabwe. The Hurungwe Safari Area is important within the Middle Zambezi Biosphere Reserve because it lies within the Buffer Zone bordering on one of the Reserve's major Core Areas, the Mana Pools National Park. The latter lies immediately east of the target area described in the Exclusive Prospective Order application. The target area map appears to show that the Ruckomechi River (which forms the western boundary of Mana Pools) is included in the Exclusive Prospecting Order application.

Mana Pools National Park itself is also a key area of the **Mana-Sapi-Chewore World Heritage Site**, a 676,600 ha (6,766 km2) area inscribed by UNESCO in 1984 for its 'Outstanding Universal Value'. Mana Pools National Park is also classified as a **RAMSAR Wetland site of international importance**, and is listed by Birdlife International as an **Important Bird Area (IBA)**.

The target area is also immediately adjacent to the **Lower-Zambezi-Mana Pools Transfrontier Conservation Area** shown in Figure 3 below.



Figure 3. Map showing the target area with the location of the Lower Zambezi Transfrontier

Conservation Area

The current economic land use activity across the Middle Zambezi landscape can be seen in Figure 4 below. The entirety of the Exclusive Prospecting Order target area falls with the Core Conservation area zone.



Figure 4. Economic land use zonation across the Middle Zambezi landscape showing the target area

All of the above underlines the global significance of this part of the Zambezi Valley as one of the world's largest, contiguous areas of protected, unsettled, wild land set aside for biodiversity, natural resource conservation and sustainable economic activity.

A detailed area management plan has been crafted for the Middle Zambezi region under the UNDP's Middle Zambezi Biodiversity Project and is in its final draft form. The development of this plan took place over two years of inclusive consultations with the neighbouring communities, councils, traditional leaders, government authorities and lease holders. The draft plan does not take into account any proposal for prospecting for oil and gas mining in the area.

1.3 CONVENTIONS TO WHICH ZIMBABWE IS PARTY

Zimbabwe is signatory to (or party to) a number of international conventions and agreements which have relevance to the target area, its Protected Area status, and the global status of its surrounding Biosphere Reserve, and neighbouring World Heritage Site etc. Some of these include:-

- · The Convention on Biological Diversity
- · The World Heritage Convention
- UNESCO's Man and the Biosphere Programme (MAB)
- · The Ramsar Convention on Wetlands
- The Convention on International Trade in Endangered Species (CITES)
- The African-Eurasian Migratory Waterbird Agreement within the framework of the Convention on Migratory Species
- The Lower Zambezi Transfrontier Conservation Area agreement
- The United Nations Framework Convention on Climate Change (UNFCCC)
- · The Convention for the Safeguarding of the Intangible Cultural Heritage

An application to prospect for oil and gas mining with potentially significant impacts relevant to any of these agreements, would immediately be brought to the attention of the international community. The resulting adverse publicity could potentially cause lasting damage to Zimbabwe's image as a reliable custodian of one of the world's largest and most contiguous wilderness assets.

1.4 ZIMBABWE'S NATIONAL DEVELOPMENT STRATEGY

The National Development Strategy for January 2021-December 2025 was published by the Government of Zimbabwe in 2020. As specifically stated in the strategy "protected areas are the hallmark of Zimbabwe's conservation efforts. Improving their protection status will not only assist the country to attain vision 2030, but will significantly impact on other sectors such as tourism and fisheries". It further notes that "as a signatory to the Ramsar Convention on Wetlands of 1971, the country has obligations to ensure wetlands are sustainably managed to ensure their regenerative capacities are not impaired and they continue to provide essential ecosystem services".

Key elements within the strategy include

• enhancing the conservation of Zimbabwe's rich biodiversity, concentrated mainly in designated parks which represent a major attraction to the tourism sub-sector

- · improving transboundary collaborations
- developing and implementing key species and protected area action plans, and
- · increasing the total area under conservation.

The strategy also reinforces that a recent success in Zimbabwe was the recent ban on alluvial mining and mining in protected areas. Allowing prospecting within the area in question will be in direct contradiction of all of the abovementioned aspects of this strategy.

1.5 PREVIOUS OIL & GAS MINING PROSPECTING

During the 1990s, the international oil company Mobil commenced a preliminary search for oil and gas in the Zambezi Valley. The Zambezi Society launched a campaign against potential damage to the habitat and wildlife of the Zambezi Valley during the prospecting and, after many months of negotiation, the company finally agreed to the use of less environmentally damaging ways of undertaking the explorations, using helicopters rather than large trucks. In the end, the company did not take its exploration for oil and gas in the Zambezi Valley any further.



Figure 5. Images of Mobil exploration techniques carried out in the Zambezi Valley in the 1990s As an international company, Mobil had a worldwide reputation to maintain in terms of its environmental credibility, and enough resources to alter their exploration methods and replace them with more environmentally sensitive ones. We do not know if the same applies to this current proposed application for oil and gas prospecting as no information is known on Shalom Mining Corporation or its credibility.

2 Potential Impacts of prospecting for oil/gas

2.1 BALANCING ENVIRONMENTAL, ECONOMIC AND SOCIAL BENEFITS TO ACHIEVE SUSTAINABLE GOALS

Zimbabwe's long-term, sustainable well-being can only be achieved through a balance of environmental, economic, and social benefits. We are reminded of this commitment through our Sustainable Development Goals which recognise the need to preserve wilderness and wildlife qualities in areas designated as Protected Areas. In our commitment to achieving our SDG's, 13, 14 and 15 (climate actions, life below water and life on land) are all clear reminders of this need).

Maintaining the pristine quality of Protected Areas, with globally-important values which have been recognized through international designations (including UNESCO and RAMSAR) is key to maintaining the environmental benefits of wildlife and wilderness areas. It is also key to maintaining Zimbabwe's status on the international tourism stage as a prime destination for wildlife and wilderness experiences, in a world that is quickly destroying its protected areas. Maintaining protected areas contributes hugely to the environmental, economic, and social wellbeing of Zimbabwe through air, water, and soil quality, job creation, and tourism-generated foreign currency income.

There is no doubt that carefully constructed and run mining operations also add economic and social benefits to Zimbabwe through the production of an internationally tradable commodity and creation of jobs. However, these benefits when compared to those of maintaining protected areas, are no more than short-term. Once the life of the mine is complete, the social and economic benefits are no longer and instead what is left behind is a negatively impacted and irreparably changed environment.

2.2 ENVIRONMENTAL IMPACTS ASSOCIATED WITH PROSPECTING

While it is not clear what methods will be used for the proposed oil exploration and (if successful) extraction, from world-wide experience it is clear that seismic exploration, well drilling, gas flares, machine waste discharge and/or establishment of a human-settlement (even if temporary) have huge environmental implications.

- Ambient air quality will be negatively impacted. We can expect air pollution to increase through increased dust and particulate matter generation, and greenhouse gas emissions which could potentially affect climate change in the area.
- Natural vegetation will be destroyed through seismic activities, road network expansion and establishment of a mining base. Critical habitats and ecosystems will be negatively impacted. With this establishment comes increased risk of deforestation, and bushmeat poaching through opportunistic reliance upon the local natural resource, and through increased access to previously inaccessible areas, and thus collapse of a local ecosystem.
- This project would interfere with, if not cut off, the movement of wildlife species populations across the landscape.
- Noise and vibration levels will increase which will impact on the surrounding tourism industry as well as the abundant wildlife resident in the area in question.
- Most concerningly we can expect water and soil pollution to increase through discharge of wastes, dredging and filling of waterways, well treatment leading to acidification of water bodies and soil, and the risk of oil spills. The proximity of the target area to Mana Pools as a Ramsar wetland site, and the Zambezi River, a life source for thousands of people in Zimbabwe, Zambia, and Mozambique raises huge concerns for the well-being of many if water sources were to be polluted. In addition, a 2011 environmental report on Ogoniland (Nigeria) by the United Nations Environment Programme highlighted the long-term environmental risk of soil pollution by hydrocarbons. Through natural seepage of hydrocarbons where petroleum is found in shallow reserves, or accidental spillage on the surface, we risk contamination of soil that alters the physical and chemical properties of the soil.

We can therefore expect the long-term environmental impacts of the proposed mine to exist well beyond the life of the mine. This in turn will impact the area's ability to regain its tourism industry. Funds required to recover the area and repair damages will far exceed those held by the local authority, particularly a local authority who will potentially be negatively impacted financially throughout the mine's life. There is no information available on Shalom Mining Limited and the ability of the company to make financial provision for rehabilitation of the area. Long term we will be left with a damaged area, that is no longer contributing to the environmental, economic, or social well-being of Zimbabwe.

- Zimbabwe's tourism industry is growing post-COVID, and there is increasing international interest in sustainable use tourism. The country is in a particularly strong position to take advantage of this interest, as its extensive Protected Area system offers landscape and wildlife-based tourism products (consumptive and non- consumptive) which are unique and relatively unspoilt as compared to similar offerings in South Africa, Botswana, Namibia, Kenya and Tanzania. Our tourism industry is the driver of many support services, including accommodation, internal transport logistics, local taxi and buses, community crafts etc. Government has had the vision to recognize this by pre-emptively expanding RGM airport, Victoria Falls airport and encouraging airlinks into Kariba, which will increase tourism access to the Zambezi Valley. The national road network is also being upgraded.
- The unique attribute of conservation and biodiversity-driven tourism is that, well managed, it will be an economic driver, providing sources of employment in perpetuity (for hundreds of years). The life of a mine (assuming it is proven to be viable and survives the coming climate change challenges) could be of the order of a decade. Furthermore, this exogenous, short-term possible injection to the economy will do lasting damage to Zimbabwe's long-term earning potential.
- · In the short-term the ZPWMA stands the risk of reduced lease values due to the lease holder's risk of sudden and catastrophic loss of earnings.
- The impacts of oil and gas mining in the middle of a biosphere reserve would effectively scythe a contiguous protected area in half, causing serious disturbance to wildlife populations and their movements through the area. This would result in loss of tourism income and loss of trust in Zimbabwe's ability to be custodians of these global assets.
- The value of the target area is likely to reduce to zero as the sustainable tourism business will be untenable during both exploration and exploitation.
- The economic value to the country and adjacent communities of the proposed project needs to be clear. The extent to which value will remain in the country needs to be determined, as a project of this size will require Direct Foreign Investment. It also needs to be determined what tax breaks will be elicited depriving this country of this value add. Often skills are imported rather than using local skill sets. Local communities tend to be offered only menial tasks while contractors bring skilled staff from further afield.

2.4 SUMMARY OF IMPACTS ON ZIMBABWE'S NATURAL RESOURCE ECONOMY

- The Nyakasanga, Chirundu and Rifa areas, lying within a buffer zone for the Mana Pools National Park, are situated right in the epicenter of the Zambezi Valley's biodiversity/wildlife/wilderness tourism and conservation destination. As described above and illustrated in the maps and images, an oil/gas mining project would have an immediate and lasting impact on the viability of this globally-important resource.
- · Zimbabwe's current reputation as being a responsible and proactive custodian of wilderness areas will be damaged.
- · Zimbabwe's well-earned place at the table of various international conventions will be tarnished.
- The contagion impact will be felt across the entire tourism and support service industry.
- The ZPWMA authority may have their income stream damaged as lease holders fear this project will be the start of a mining "creep" across the Zambezi Valley.
- · General and unique natural habitats would be disrupted and potentially destroyed.
- · Natural water sources (springs, pans, river systems) would be disturbed and potentially damaged.

- · Access for wildlife poachers would be increased via new tracks and road networks.
- · Use of explosives for seismic testing would adversely affecting wildlife and tourism.
- · It is likely that if oil/gas mining takes place, the entire current land use will have to cease.

3 The Mining Process

The potential impacts that can be expected to occur as a result of prospecting have been outlined above. It is also necessary to consider the potential future mining processes. It must be noted that The Zambezi Society is fully cognisant that this application refers to prospecting and not mining, but the reality remains that should prospecting prove successful, mining would commence at some stage in the future, and it is imperative that the scale of disturbance from these activities is fully considered from the outset. To gain some insight into the potential damage and disruption that an oil and gas mining project in this part of the Zambezi Valley could cause, if all approvals are obtained under law, it is necessary to turn to other similar projects. It is important to stress that we can only hypothesize the activities that will be involved, due to the lack of detailed information.

A grid of 2 meter wide tracks (example illustrated below left) will be cleared (see the transect lines marked on Figure 1 above) at intervals of between 1km and 3km across the entire target area with two cross-cutting tracks to tie the grid. This will allow access for closely spaced exploration interventions using vibrator machines (illustrated below right). The alternative, but much more expensive access option would be by heavy duty helicopter.



Figure 6. Example of swathe of track cut through mopane woodland to allow vibrator truck access for exploration purposes

Once these results have been analysed and deemed to be worth pursuing then a large rig (see Figure 7 below) is brought to site for deep hole analysis. The requires a wide road and a working area of about 3 football fields per site. The drill would then move to up to approximately 12 sites over a period of a few years.



Figure 7. Example of rig site for deep hole analysis

If this phase proves that an economic gas/oil resource exists then many/ several well points will be sunk with associated head gear (Figure 8 below) and the need for permanent access and attendance. There could be two possible utilization methods. Local power generation (gas turbines) from each extraction point with power being evacuated through overhead lines. Or a network for pipes taking the product to a central power/ processing utility.



Figure 8. Example of a "nodding donkey" headgear used for oil production

4 The Legal process

No person may prospect in an area under ZNPWMA without the express permission of the ZNPWMA. This was NOT given and therefore the entire application is flawed and must be withdrawn. Evidence that express permission was granted must be made available.

The statement "Prospecting Authority is sought upon registered base Mineral Blocks within the reservation" is confusing, as this implies that they are seeking permission which has not yet been given. It is that "Authority" that The Zambezi Society and other stakeholders wish to deny.

The following legislation bears reference to the proposed Exclusive Prospecting Order. As will be shown, the application and proposed activity is in direct contravention of numerous laws of Zimbabwe.

For the avoidance of doubt, the applicable sections of legislation have been included in full below for point of reference. In particular see s 119 (1) below (bold and underlined for reference).

4.1 PARKS AND WILDLIFE ACT [CHAPTER 20:14]

Section 119 Prospecting and mining

(1) **No person** shall prospect in terms of the Mines and Minerals Act [Chapter 21:05] within a national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park except—

[inserted by Act 19 of 2001 with effect from the 1st June, 2002.]

(a) in terms of a permit issued by the Minister with the consent of the Minister of Mines:

[See Come Again Mines (Pvt) Ltd v Parks & Wildlife Mgmt Authority & 2 Ministers 14-HH-392] or

(b) in accordance with any prospecting rights lawfully acquired in respect of the area of the national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park before the date when such area became a national park, botanical reserve, botanical garden, sanctuary or recreational park.

[inserted by Act 19 of 2001 with effect from the 1st June, 2002.]

(2) No person shall acquire or work any mining location in terms of the Mines and Minerals Act [Chapter 21:05] within a national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park except—

[inserted by Act 19 of 2001 with effect from the 1st June, 2002.]

- (a) in terms of a written agreement between the Minister and the person concerned which has been approved by the President; or
- (b) in accordance with any mining rights lawfully acquired in respect of the area of the national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park before the date when such area became a national park, botanical reserve, botanical garden, sanctuary or recreational park.

[inserted by Act 19 of 2001 with effect from the 1st June, 2002. See Come Again Mines (Pvt) Ltd v Parks & Wildlife Mgmt Authority & 2 Ministers 14-HH-392]

(3) Notwithstanding this Act, a person prospecting or working any mining location in terms of subsection (1) or (2) may do anything necessary for those purposes within the national park, botanical reserve, botanical garden, sanctuary, safari area or recreational park concerned, subject to the terms and conditions of the relevant permit or agreement or in accordance with the mining rights, as the case may be.

[inserted by Act 19 of 2001 with effect from the 1st June, 2002.]

(5) Any person who contravenes subsection (1) or (2) shall be guilty of an offence and liable to a fine not exceeding level five or to imprisonment for a period not exceeding six months or to both such fine and such imprisonment

[inserted by Act 22 of 2001, with effect from the 10th September, 2002.]

4.2 MINES AND MINERALS ACT [CHAPTER 21:05]

Part VI EXCLUSIVE PROSPECTING RESERVATIONS (SS86-119)

- 87 Application for order
- (1) Any person may make written application to the Board for the making of an order in his favour over any defined area in Zimbabwe, including any area reserved under section thirty-five.
- (2) The applicant shall—
- (a) deposit with the Secretary in respect of a period of 6 months a sum calculated at the rate of **US\$100** per month for every hectare or part of a hectare of the area in respect of which the order is sought:

[Rate amended from **ZW\$0,02** per month to the above by the Finance (No.3) Act 10 of 2009 with effect from the 1st January, 2010.]

Provided that a deposit in terms of this paragraph shall not exceed ZW\$ 90 000; and

- (b) furnish the Board with—
- (i) full information as to his financial status;
- (ii) if so required by the Board, particulars of any guarantees that may be offered for the performance of his obligations under the order;
- (iii) particulars of the minerals which he wishes to seek and mine;
- (iv) details illustrated by a sketch plan of the area to be embraced by the order and the size of such area:
- (v) a statement whether or not he wishes the order to authorize him to prospect for specified minerals on any registered base mineral blocks within the reservation;
- (vi) any further information required of him by the Board;
- (vii) if the applicant is a company, the full names and nationality of the directors and the full names by which those directors have at any time been known in any part of the world;
- (viii) a programme of the prospecting operations he intends to carry out within the reservation during the first **period of 6 months** from the date of granting the order.
- (3) The chairman of the Board may provisionally approve an application before it is considered by the Board and, if he does so, he shall issue a direction to the mining commissioner to reserve the area embraced by the application against prospecting and pegging in terms of section thirty-five, and the mining commissioner, without obtaining the authority of the Minister, shall forthwith reserve such area accordingly.
- (4) On receipt of the application the chairman of the Board shall—
- (a) publish a notice in the Gazette giving details of the application and inviting objections thereto; and
- (b) if in any application authorization is sought to prospect on any registered base mineral blocks within the proposed reservation, give written notice to every registered holder of any such block.

The Notice in the Government Gazette states the application was made under S87 of the Mines and Minerals Act Chapter 21:05, as outlined below. It cannot be confirmed if the applicant lodged fees of US\$ 90 000.00 No evidence has been provided of a credible track record for this hitherto unheard of Company, nor is there any evidence of the financiers and adequate proof of their financial resources.

4.3 ENVIRONMENTAL IMPACT ASSESSMENT

Notwithstanding the above, anyone engaged in prospecting, mining and quarrying will have to be in possession of an Environmental Impact Assessment (EIA).

There are two pieces of legislation applicable to EIAs in Zimbabwe: The Environmental Management Act (13 of 2002, 5/2004, 6/2005, 5/2011), and The Environment Management Act

(Environmental Impact Assessment and Ecosystems Protection) Regulations of 2007 (Statutory Instrument 7 of 2007 Amended by SI 3/2011).

Any project listed in Schedule 1 of the Act requires an EIA. Schedule 1 specifically stipulates mining and quarrying, including mineral prospecting; mineral mining; ore processing and concentrating; and quarrying. The act states that such projects "must not be implemented" without an EIA.

4.3.1 The Environmental Management Act (13 of 2002)

97 Projects for which environmental impact assessment required

- (1) The projects listed in the First Schedule are projects which must not be implemented unless in each case, subject to this Part—
- (a) the Director-General has issued a certificate in respect of the project in terms of section one hundred, following the submission of an environmental impact assessment report in terms of section ninety-nine; and
- (b) the certificate remains valid; and
- (c) any conditions imposed by the Director-General in regard to the issue of the certificate are complied with.
- (2) Subject to subsection (4) any person who knowingly implements a project in contravention of subsection (1) shall be guilty of an offence and liable to a fine not exceeding level fourteen or to imprisonment for a period not exceeding five years or to both such fine and such imprisonment.

First Schedule (Sections 2 and 97)

PROJECTS THAT REQUIRE ENVIRONMENTAL IMPACT ASSESSMENT

- 7. Mining and quarrying—
- (a) mineral prospecting;
- (b) mineral mining:
- (c) ore processing and concentrating;
- (d) quarrying.

It is therefore clear that and EIA will be required for prospecting. There is no mention of any EIA to be undertaken for "Prospecting" (this should be undertaken as a separate process from the EPO). Such an assessment should take into account the opinion of all stakeholders in the exact area to be affected (Nyakasanga, Chirundu, Rifa) and in adjacent areas (including Mana Pools and the Zambian side of the Zambezi River.) Any existing studies regarding the biodiversity (flora, fauna, critical habitats and species) of the area should be taken into account as there are likely to be directly or indirect impacts due to prospecting activities, or increased human access to these currently protected areas.

4.3.2 The EIA Process

The EIA Process is itself strict and requires certain procedures to be followed.

The EIA process involves submitting a prospectus containing a brief description of the project to the Director General for consideration. The Director General has 20 days to approve/refuse

the prospectus. If approved, the developer must then proceed with the EIA process. The developer must appoint registered consultants to conduct the EIA. All consultants must be registered with the EMA, and are issued a licence indicating that they are registered.

Developer to submit prospectus

- (1) Before doing an environmental impact assessment for a project, a developer shall submit a prospectus to the Director-General containing such information regarding the assessment and the project as may be prescribed.
- (2) The Director-General shall examine every prospectus submitted in terms of subsection (1) without delay and, on completion of his examination, shall—
- (b) if he is satisfied that the proposed environmental impact assessment will be capable of evaluating the project's impact on the environment, approve the prospectus and ask the developer to proceed to prepare an environmental impact assessment; or
- (c) if he is not satisfied as provided in paragraph (b), reject the prospectus and give the developer such directions as may be necessary for the preparation of a fresh prospectus.

5 Conclusions

The Zambezi Society, as a local stakeholder dedicated to the conservation of the Zambezi Valley's wildlife and wilderness values, strongly objects to the granting of this application. While we acknowledge the benefits of mining, and that mining does have its place in the Zimbabwe economy, we contend that these do not supersede those of a functioning Protected Area that is:-

- contributing to the long term, sustainable, environmental, economic, and social wellbeing of Zimbabwe through protecting air, water, and soil quality, providing jobs and creating tourism-generated foreign income.
- a key section of an internationally-recognised Biosphere Reserve which seeks to create a sustainable balance between protecting the natural environment while providing economic and social benefits to the people of Zimbabwe
- · immediately adjacent to and acting as an important buffer zone to a globally-recognised World Heritage Site, renowned for its "outstanding universal value", its dramatic landscape and ecological processes and its abundant wildlife
- placing Zimbabwe on the international tourism stage as a prime destination for wildlife and wilderness experiences (with associated revenue and employment generation)
- · actively contributing to Zimbabwe achieving multiple sustainable development goals.

We believe that if this project were to go ahead, it would sever the artery of sustainability (for both conservation and tourism) across the Middle Zambezi, thereby doing irreversible damage to the image of Zimbabwe internationally, and to the country's national and local economies in the long term.

SIGNED BY THE ZAMBEZI SOCIETY

19 May 2023

IF YOU'D LIKE TO HELP US IN OUR EFFORTS TO PREVENT OIL AND GAS PROSPECTING IN THE ZAMBEZI VALLEY, PLEASE MAKE A DONATION VIA THIS LINK:
DONATE HERE