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Office of the Environmental Commissioner  
Ministry of Environment & Tourism  
Private Bag 13306  
Windhoek

**Att: Damian Nchindo, Chief Conservation Scientist**

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**SUBJECT: NOTICE OF UNFITTING VERIFICATION OF APPLICATION 3522**

I am writing to bring to your attention a critical issue regarding the review of Application APP: 3522 for the proposed charcoal processing and operation of a charcoal factory in the Northern Industry Area, Windhoek.

The Ministry of Environment, Forestry and Tourism (MEFT), as the reviewing authority, has incorrectly assessed this application under the standard procedures for new projects. However, it is important to note that while this is the first-time application for an Environmental Clearance Certificate (ECC), the operation already exists.

This distinction is significant, as the review should account for the cumulative environmental impacts of ongoing operations, rather than a renewal application requesting for an old ECC, which does not exist. The current review process may not have adequately addressed the operational non-compliance, which are vividly addressed in the uploaded EMP.

I kindly request your intervention to ensure the application is re-evaluated under the appropriate framework and be considering as existing operations with a new ECC application for the operations and not a renewal application. This will align the process with the Environmental Management Act and ensure compliance with Namibia's environmental governance standards.

Please let me know if further details or documentation is required. I am available to discuss this matter at a suitable time.

For further enquiries, do not hesitate to contact us on **061-219773/0811472029/0812095996**

**Yours in truly,**

Fredrich Nghiyolwa



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Principal Environmental Assessment Practitioner  
**Junior Baiano Industrial Consultants**