

Mr. Timoteus Mufeti  
Environmental Commissioner  
Ministry of Environment, Forestry and Tourism  
Private Bag 13306  
Windhoek, Namibia

24 August 2025

Dear Mr. Mufeti

**Subject:** Request for the consideration evaluation of the Application for Environmental Clearance for Exclusive Prospecting Licenses (EPL) 8858, Karas Region in the absence of a NHC Consent

Enviro-Leap Consulting cc, has outsourced the Environmental and Heritage Impact Assessment (EHIA) services to TARP Archaeological and Heritage Consultants noting and appreciating the importance of protecting the environment, communities and their historical and or heritage resources and their protection thereof as required in terms of the National Heritage Act (No. 27 of 2004) for the well-being of our societies and the benefit of coming generations.

However, TARO Consultant in attempt to engage affected stakeholders i.e. commercial farm owners in order to undertake the required heritage baseline assessment on the commercial farms overlain by the proposed EPL 8858, encountered challenges of access to these properties. The heritage baseline review in this case aimed at seeking guidance to known protected places and protected objects for risk assessment and to propose mitigation measures for employment during explorations activities.

Critically, our rapid desktop review of the potential presence of significant heritage resources within the EPL area revealed that in general the proposed prospecting technique and methods present no significant impacts to the Heritage value of the area. Further, leaning on several provisions of the National Heritage Act (No. 27 of 2004) i.e.:

1. Section 46 which prohibits the removal, damage, alteration or excavation of heritage sites or remains (defined in Part 1, Definitions 1);
2. Section 48 sets out the procedure for application and granting of permits such as might be required in the event of damage to a protected site occurring as an inevitable result of development;
3. Section 51 guides while Section 53 (7) and Section 54 (7) set out the requirements for impact assessment, particularly in conservation areas and near listed buildings. This would then allow the identification of possible sensitive heritage resources that could be negatively affected by infrastructure developments;
4. Section 55, Paragraphs 3 and 4 require that any person who discovers an archaeological site or heritage resource should notify the Council. Section 62 outlines the heritage regulations concerning the issuing of any permit or consent under the Act.

Several mitigation measures in respect to potential impact on Heritage Resources, including the adoption of the "Chance Find Guidelines" were incorporated into the Environmental Management Plan component of the Environmental Scoping.

Therefore, we herewith request your good office to grant permission to proceed with the appraisal of the EIA and EMP reports for the consideration of the environmental clearance certificate and to annex as conditions to the environmental clearance, necessary for the EPL proponents to minimize their potential impact by concentrating their exploration activities to target areas with significant or high geological potential. Further, potential impacts may be mitigated through strict compliance with the EMP for both Heritage and Environmental can

We trust and anticipate that your esteemed office finds this request sincere, and look forward to your favorable consideration.

Kind Regards

Mr. Lawrence Tjatindi  
Director and Environmental Scientist  
Enviro-Leap Consulting Cc

