

Date: 09 June 2025

The Office of the Environmental Commissioner
Department of Environmental Affairs and Forestry
Ministry of Environment, Forestry and Tourism
Private Bag 13306 Windhoek, Namibia

Attention: Mr. T. Mufeti

Dear Sir

Re: National Radiation Protection Authority (NRPA)/Atomic Energy & Radiation Protection Authority (AERPA) Consent Matter – The Proposed Construction and Operation of a New Lattice Telecommunication Tower at Havana High School in Windhoek, Khomas Region for APP-005806 and the Proposed Construction and Operation of a New Lattice Telecommunication Tower at Rebecca Kambundu Primary School in Rundu Town, Kavango East Region for APP-005807

Mobile Telecommunications Limited (*MTC Namibia*) proposes to construct and operate two 25m high lattice telecommunication towers within the premises of the Rebecca Kambundu Primary School in Rundu Town at these coordinates -17.932238, 19.790348, and within the premises of the Havana High School in Windhoek at these coordinates -22.492685, 17.012255. The proposed tower sites will cover an area of 12m x 12m at their respective locations. The EIA Studies were conducted, completed, and the respective Scoping Report with EMPs compiled.

As requested on the ECC Portal (upon screening of the ECC applications), consent from the NRPA/Atomic Energy & Radiation Protection Authority (AERPA) was requested. Based on the engagement with the AERPA on recently completed EIA studies for nine (9) new tower sites on 08 April 2025, the AERPA responded to the consent request with the attached letter (attached hereto) for your attention. **However, according to recent updates from MTC Namibia, there are ongoing direct engagements between the AERPA and MTC to resolve the consent issuance matter (contact Mr. Tuhafeni Erastus: Project Coordinator at MTC, Mobile +264 81 325 1726).**

Should you or your office require further information, please do not hesitate to contact us.

Yours sincerely,



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Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Serja Hydrogeo-Environmental Consultants CC

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**NATIONAL RADIATION
PROTECTION AUTHORITY**
*Established pursuant to Section 33 (1) of the Atomic Energy &
Radiation Protection Act, Act No 5 of 2005*

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Ref: 19/2/2/2

Date: 25 February 2025

Mr Timoteus Mufeti
Environmental Commissioner
Ministry of Environment, Forestry and Tourism

Dear Mr Mufeti

Subject: Proponents Non-Adherence or Non-Compliance with Non-Ionising Radiation Protection Regulations: Atomic Energy and Radiation Protection Act, 2005.

The National Radiation Protection Authority (NRPA) is a statutory body established in terms of Section 33 of the Atomic Energy and Radiation Protection Act, Act No 5 of 2005. The mandate of the NRPA is to provide for adequate protection of the environment and of people in current and future generations against the harmful effects of radiation including controlling and regulating **non-ionising radiation** sources such as mobile communication network towers and related infrastructure.

In an attempt to bring the operators of mobile communication towers under regulatory control or oversight, we held numerous consultative meetings and engagements with mobile communication service providers sensitizing them on the regulatory requirements as outlined in the Non-Ionising Radiation Regulations: Atomic Energy and Radiation Protection Act, 2005.

We have noted with concern that Mobile Telecommunications Limited (MTC) and Paratus Telecommunications (Pty) Ltd have disregarded our advice and recommendations. MTC has clearly communicated that they do not believe they fall within our regulatory process and rather advised Government to reform. Further, we experience that some proponents only approach our office in case they encounter challenges such as community opposition and resistance. Our recommendations to the mobile communication service providers have been in line with the regulatory provisions as outlined in clauses 4, 5 and 9 of the afore-mentioned regulations.

These Recommendations include that:

- i. Mathematical calculation or appropriate modelling tool be used to establish boundaries (exclusion zone) for every antenna mounted on the base station, outside

Mission

To provide for the adequate protection of the environment and of people in current future generations against the harmful effects of radiation

- of which electric and magnetic field (EMF) exposure is below the International Commission on Non-Ionizing Radiation (ICNIRP) limits. This information should be provided to the Authority as soon as practical.
- ii. Reasonable and practicable engineering or administrative control measures are implemented for established boundaries to regulate access by members of the public and workers.
 - iii. The site be registered as required by the Non-Ionising Radiation Regulations (Government Notice No 126 of 2020).

In light of the above, the NRPA will no longer review or approve installations by MTC and Paratus, until such time that they demonstrate readiness to comply with the regulatory requirements.

I trust the above is in order.

Yours Sincerely,

Axel Tibinyane

Director

