

**COMMENTS AND INPUTS FROM THE EIA CONSULTATION AND ENGAGEMENTS
(EXTRACTED FROM THE ENGAGEMENT SESSIONS/MINUTES AND DWNP
RESPONSE LETTER TO THE CONSENT REQUEST)**

Environmental Impact Assessment (EIA) Study for the proposed salt production within ten (10) Mining Claims (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia - Application for Environmental Clearance Certificate (ECC - Application for Environmental Clearance Certificate (ECC)

The key comments and issues made during the EIA consultation process were recorded and noted as presented in Table 1.

Table 1: Key Issues, suggestions, and comments received during the EIA consultation process for the MC75982-75991

No.	Name of the Speaker/Commenter & Capacity	Comment/Issue/Suggestion	Response provided by:
	Ms. Sarah Leonard: Erongo Regional Council (ERC), Swakopmund	Is MEFT aware of this project? What impact will it have on the livelihood of the seals?	<p>Mr. Stefanus Johannes (EAP, Serja HGE Consultants): We are still busy with the ongoing EIA process, and a letter of notice has been submitted to the MEFT's Directorate of Wildlife & National Parks office in Windhoek, since the MEFT is also listed as a stakeholder of this project. We are also engaging the MEFT offices here in Swakopmund, including the Cape Cross Seal Reserve Division. Furthermore, communication has also been sent to both the Windhoek and Swakopmund offices. We will wait for any feedback from their offices, if any. The ECC application for the mining claims is registered on the MEFT ECC Portal under the Department of Environmental Affairs & Forestry.</p> <p>Regarding the environmental impacts, the potential impacts are listed in the BID, and they will be assessed in the EIA Report. The measures to manage and mitigate potential impacts on the seal community near the site, among other anticipated impacts, will include an EMP for implementation.</p> <p>Added to that to ensure continued conservation, the crystallisers will be constructed in such a way that allows the movement of mammals. The natural brine ponds nearer the sea will not be affected because the Proponent will leave a buffer area between the crystallisers and the natural brine ponds.</p>

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2	Ms. Sarah Leonard: Erongo Regional Council (ERC), Swakopmund	When is it projected to begin?	Mr. Stefanus Johannes: The project would only commence after the ECC has been issued by the Environmental Commissioner and the Mining Claims rights (certificate) has been issued by the Ministry of Industries, Mines & Energy (MIME). The approval of the EIA documents and issuing of the ECC may take from 2 to 3 months or sometimes longer, and the issuance of the salt production rights by the MIME usually takes less time compared to the ECC (mostly immediately after the ECC copy is submitted to the MIME). After obtaining these, the Proponent (Telfs Investments) will then prepare other required documents for the project and schedule site operations (such as setting up the site for the actual salt production activities).
3	Ms. Janine Vorster (Engineer): NamWater - Business Unit Coastal, Swakopmund	The mitigation measures should be stringent to prevent or minimize potentially negative changes in the ecosystem.	Mr. Stefanus Johannes: This is well noted. Indeed, measures will need to be recommended for each potentially affected environmental component. This will also be backed up by bi-annual site inspection and environmental monitoring reports to be submitted to the Environmental Commissioner (as one of the ECC conditions).
4	Ms. Janine Vorster (Engineer): NamWater - Business Unit Coastal, Swakopmund	I am concerned about the increasing number of commercial trucks in the area.	Mr. Stefanus Johannes: This is well noted, and as you correctly put it, this will be a cumulative impact, as the proposed project activities will add to the existing traffic flow in the area. However, measures to reduce the significance of this impact associated with the project will be recommended and implemented.
5	Ms. Janine Vorster (Engineer): NamWater - Business Unit Coastal, Swakopmund	We are looking forward to the project materializing, with mitigation measures effectively implemented on the ground.	Mr. Stefanus Johannes: This is noted with thanks.
6	Ms. I. F. Neis: Municipality of Henties Bay, Henties Bay	How long does the EIA take?	Mr. Stefanus Johannes: From our end, the process usually takes about two months before we can submit the EIA documents to the Environmental Commissioner at the MEFT for evaluation and consideration of the ECC. Once we submit the documents to the MEFT, the evaluation process can take from 2 to 3 months, or longer (depending on the evaluation team and the amount of workload/other project EIAs being reviewed at the time of our submission). Therefore, we have no control over how much longer it could take for MEFT to review the EIA documents and consider the ECC.

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7		Who are the owners of the project?	Mr. Stefanus Johannes: The project owner or proponent is Telfs Investments (Pty) Ltd.
8		Do all projects require an Environmental Clearance Certificate (ECC), or is it only for a specific type of project? I am asking because we too have projects, we plan to execute, but are still in the planning phase, and I am not sure if we will also need an environmental impact assessment or not.	Mr. Stefanus Johannes: There is a list of all activities that require ECCs, which are subject to EIA studies under the 2012 EIA Regulations of the Environmental Management Act No. 7 of 2007. Regarding municipality projects, they will need to be checked against the requirements of the Regulations to see which of them will require EIA studies (ECCs).
9		Can an EIA suggest overwhelming negative impacts on the environment and the ultimate prevention of that specific project from happening?	Mr. Stefanus Johannes: Yes. The EIA study is aimed at identifying potential environmental and social impacts stemming from project activities. The impacts are then described, and their significance assessed. Mitigation measures are then recommended for negative impacts to minimize or reduce the impact significance, if avoiding the impacts is not possible. In some instances where mitigation may not be feasible, an alternative site may be recommended for assessment.
1	Ms. Nadine Downing: Cape Cross Lodge Manager, Cape Cross	What routes will be used to access the sites and to transport the salt	Mr. Stefanus Johannes: The Proponent is aiming to stick to existing routes as far as practically possible to avoid the unnecessary creation of new access routes.
1		I am more concerned about seals and plants in the area	Mr. Stefanus Johannes: This is a genuine concern, given that the project is undertaken in such a sensitive area. Thus, measures will be recommended in the EMP for implementation to reduce the impact on the seals and plants. Added to that to ensure continued conservation, the crystallisers will be constructed in such a way that allows the movement of mammals. The natural brine ponds nearer the sea will not be affected because the Proponent will leave a buffer area between the crystallisers and the natural brine ponds. The impact management will also be backed up by bi-annual site inspection and environmental monitoring reports to be submitted to the Environmental Commissioner (as one of the ECC conditions).
1		Where will the workers be accommodated during the	Mr. Stefanus Johannes: As provided in the BID, some of the project staff who are required to be on-site will be accommodated in a prefabricated campsite that is

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		construction and operation of the mining claims?	already in existence. The rest of the staff (particularly those from Henties Bay) reside in Henties Bay and commute to the site by bus (3 bus trips per day) or private vehicle daily, as necessary. The camp has a kitchen that provides food for the resident (camp) staff. Furthermore, the camp is equipped with a French drain system to manage sewage.
		I have noted that salt mining in the area is increasing at an alarming rate.	Mr. Stefanus Johannes: The area is rich and fit for salt mining. Therefore, it becomes a concern from an environmental perspective, and correctly so. Although we cannot really quantify the number of mineral licenses in the area that are of interest in salt production on the coastline between Cape Cross and Henties Bay, Telfs Investments will give its 100% in managing their contribution to the impacts. However, a coordinated environmental management between different salt production companies in the area will also be encouraged to avoid significant damage to the environment.
		To what extent will the salt be processed?	Mr. Stefanus Johannes: There will be no processing at the mining claims (onsite). The only activity to be on-site is salt extraction. The processing will be done off-site at the Plant situated on the active Mining License (ML) No.11, located about 10km southeast of the site (MCs). Therefore, no salt processing will be carried out on-site (within the boundaries of the MCs). The offsite processing plant on ML-11 is fully equipped with crushers (i.e., primary and secondary), conveyors, a wash plant, a drying and stockpiling area, and a bagging plant.
		What technique will be used to mine the salt?	Mr. Stefanus Johannes: The method used is called crystallisation. Please refer to section 2 of the BID, where the process is summarised.
		Who owns the mining claims?	Mr. Stefanus Johannes: The project owner or proponent is Telfs Investments (Pty) Ltd.
	Ms. Renathe Dausas: MEFT Cape Cross Seal Reserve, Swakopmund	What roads will be used to access the mining claims?	Mr. Stefanus Johannes: The Proponent aims to stick to existing routes as far as practically possible to avoid the unnecessary creation of new access routes.
		When is the project expected to start?	Mr. Stefanus Johannes: We do not have an exact commencement date at the moment, as we are still busy with the EIA Study. However, the project would only commence after the ECC has been issued by the Environmental Commissioner and the Mining Claims rights (certificate) has been issued by the Ministry of

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			<p>Industries, Mines & Energy (MIME). The approval of the EIA documents and issuing of the ECC may take from 2 to 3 months or sometimes longer, and the issuance of the salt production rights by the MIME usually takes less time compared to the ECC (mostly immediately after the ECC copy is submitted to the MIME). After obtaining these, the Proponent will then prepare other required documents for the project and set up the site for the actual salt production activities.</p>



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24 March 2026

Ms. Fredrika N. Shagama

Serja Hydrogeo-Environmental Consultants CC

PO Box 27318

Windhoek

Dear Ms. Shagama,

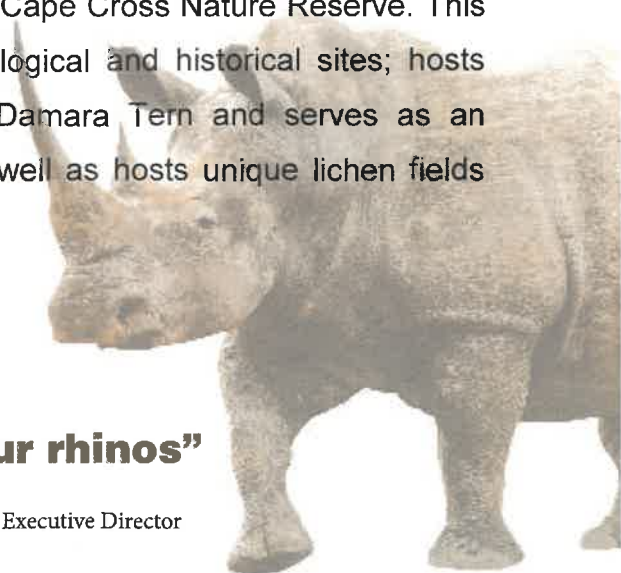
Response by Directorate of Wildlife and National Parks, Ministry of Environment, Forestry and Tourism, on the scoping report for the proposed salt production within 10 Mining Claims MC75982 – 75991 located south of Cape Cross in the Erongo Region, Application Number 006781

The Directorate of Wildlife and National Parks has reviewed the scoping report for the proposed salt production within the ten above-mentioned Mining Claims.

The ten claims fall within the “Special Value” Zone of Cape Cross Nature Reserve. This zone is high in archaeological, geological, paleontological and historical sites; hosts important breeding colonies of the near endemic Damara Tern and serves as an important seabird area for feeding and roosting; as well as hosts unique lichen fields which are highly vulnerable to physical disturbance.

“Stop the poaching of our rhinos”

All official correspondence must be addressed to the Executive Director



No new Mining Claims are allowed in Protected Areas, and I therefore regret to inform you that the Directorate of Wildlife and National Parks cannot support the approval of Mining Claims MC75982 – 75991.

Yours sincerely,



Bennett Kahuure
Director





Date: 16 April 2026

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: Response regarding the Consent from the Directorate of Wildlife & National Parks on the EIA Scoping Report and Environmental Management Plan (EMP) for the proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia – Application for ECC (ECC Application No. APP-006781)

As appointed by Telfs Investments (Pty) Ltd (the Proponent) to conduct the EIA Study process and apply for an ECC on their behalf, Serja Hydrogeo-Environmental Consultants cc (*Serja HGE Consultants*) commenced the EIA process on the 05th of November 2025 with formal written notices to key stakeholders, including the project site/land custodian (Directorate of Wildlife & National Parks) on the 9th of December 2025 (**Annexure 1**). The submitted written notice (letter) to the DWNP was accompanied by the project Background Information Document (BID). Following the initial communication on the 9th of December 2025, the draft EIA Scoping (with the EMP and associated appendices) was submitted to the DWNP for review and consideration of the consent letter (see **Annexure 2**). A response to the consent request (**Annexure 3**) was provided to Serja HGE Consultants and collected on the 9th of March 2026. However, the DWNP cannot issue consent to the proposed salt production on the 10 mining claims (MC-75982-75991), due to the *special value zone of the Cape Cross Nature Reserve as fully detailed in Annexure 3*. We acknowledge the concern from the DWNP; however, based on our site observations, the lichens are not on the salt pans (also as per section 5.1.2.1: floral habitats, page 28 and Figure 5-5, page 29 of the Scoping Report). Similarly, Damara Terns (*Sterna balaenarum*) seem to breed mainly on gravel plains near the seal colony. Therefore, the proposed salt mining activities on the salt pan will not have a significant impact on these two components. It should also be noted that the only activities that will be conducted on the mining claims are limited to salt excavation and not processing (section 2.3, page 6 of the Scoping Report).

Furthermore, the archaeological and cultural heritage impact has been assessed by an experienced Archaeologist and the two Archaeological and Heritage Impact Assessment (AHIA) Reports (Appendix I of the Scoping Report). The archaeological and heritage sensitivity of the site was also assessed as of low significance in the AHIA Reports as referenced under section 5.4.2.2 of the EIA Scoping Report (page 45). The two AHIA Reports have been submitted to the National Heritage Council (NHC) of Namibia for evaluation and decision-making on the Heritage Consent (decision pending with the NHC once the evaluation of the reports is completed).

It is therefore against this background that we request a reconsideration during evaluation for the ECC to be granted under these conditions to:

- Limited and specific activities that are deemed acceptable considering the low intensity and low frequency of work on the project mining claims' sites (refer to Scoping Report section 2.4 on page 9), and or
- Restrict salt excavation works to areas in the mining claims that leave a larger buffer area between the beach and the crystallisers. This has also been indicated and considered in the Scoping Report under Chapter 2 (page 6 after the map in Figure 2-1), which states that *"the natural brine ponds nearer the sea will not be affected because the Proponent will leave a buffer area between the crystallisers and the natural brine ponds."*

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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