

Date: 11 December 2025

STAKEHOLDER ENGAGEMENT AND CONSULTATION MEETING MINUTES

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)

Date: Monday, 08 December 2025 & Tuesday, 09 December 2025

Time: Engagement times differed from office to office, but it was from 09:00 AM to 2 pm (15:00)

Venue: Erongo Regional Council, Ministry of Environment, Forestry & Tourism (MEFT)'s Directorate of Wildlife and National Parks, NamWater offices, MEFT's Cape Cross Seal Reserve (in Swakopmund), Cape Cross Lodge in Cape Cross, Municipality of Henties Bay in Henties Bay, and Henties Soutwerke (neighbouring the project site).

Project Proponent: Telfs Investments (Pty) Ltd

Engagement and Consultation Representation (Attendance)

The EIA one-on-one engagement and consultation sessions had an attendance of seven (7) people, including two Environmental Assessment practitioners (EAPs) from Serja Consultants, and one Archaeologist. The combined signed engagement register is attached hereto.



Figure 1: Some of proceedings of the EIA one-on-one engagements on the 08th and 09th of December 2025

1. INTRODUCTION AND WELCOMING

Mr. Stefanus Johannes (Environmental Assessment Practitioner / Consultant) from Serja HGE Consultants explained the project activities and EIA process to the individual stakeholders engaged and consulted in the Erongo Region. Mr. Johannes then presented the requirements of the 2012 EIA Regulations: Environmental Management Act No. 7 of 2007 on Public Consultation, Sections 21 to 24. The attendance register was provided to the stakeholders to sign as proof of consultation to be appended to the EIA Scoping Report.

2. MEETING AGENDA AND PRESENTATION

The Environmental Assessment Practitioner (EAP) / Mr. Johannes presented the agenda of the engagement, which included the following main points:

2.1 Explanation of what an EIA is, its Process, and the Public Role in the Process

Mr. Johannes explained that the EIA process is done in compliance with the EMA, as the proposed salt production within the boundaries of MC75982-75991 is one of the listed activities that cannot be undertaken without applying and obtaining an Environmental Clearance Certificate (ECC) from the Environmental Commissioner, which is subject to an EIA process and EIA Scoping Report as well as an Environmental Management Plan (EMP). The EIA process requires that engagements be done with stakeholders as well as the affected and or interested parties (I&APs) where the project activities would be undertaken. Therefore, the ECC needs to be obtained first from the Environmental Commissioner at the MEFT before the project can start.

Furthermore, the ECC is required by the Ministry of Industries, Mines and Energy (MIME) to consider the issuance of the mining rights to the mining claims (mining claims certificate). Therefore, should the Environmental Commissioner issue the ECC for the project, the Proponent will submit a copy of the ECC to the MIME for consideration of the mining rights certificate.

2.2 Brief Description of the Project

A brief description of the planned project activities was presented as per the provided BID copy, and Mr. Johannes emphasized the importance of understanding the conducted EIA Study.

2.3 Presentation of Potential Project Impacts

To ensure transparency and that the attendees understand both sides of the proposed project activities, Mr. Johannes also presented the potential pre-identified positive and negative environmental impacts anticipated from the proposed project activities. This will establish the basis for environmental management and mitigation measures to be developed for the proposed project.

2.4 Public Open Discussion (Interactive Session)

The engaged stakeholders were provided with an opportunity to ask questions and/or raise concerns about the proposed project activities to be incorporated into these minutes and used as the basis for the compilation of the EIA Scoping Report and Draft EMP. The key comments and issues made in the meeting were recorded and noted for consideration and inclusion in the EIA Report. These issues and comments are presented in Table 1.

Table 1: Issues, suggestions, and comments noted during the EIA engagements in Swakopmund, Henties Bay, Cape Cross, and near the site on the 08th and 09 December 2025

No.	Name of the Speaker/Commenter	Comment/Issue/Suggestion	Response provided by:
1	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?	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

No.	Name of the Speaker/Commenter	Comment/Issue/Suggestion	Response provided by:
			<p>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>
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 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).

No.	Name of the Speaker/Commenter	Comment/Issue/Suggestion	Response provided by:
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.
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

No.	Name of the Speaker/Commenter	Comment/Issue/Suggestion	Response provided by:
			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	<p>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.</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. 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).</p>
1		Where will the workers be accommodated during the construction and operation of the mining claims?	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 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.
1		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

No.	Name of the Speaker/Commenter	Comment/Issue/Suggestion	Response provided by:
			management between different salt production companies in the area will also be encouraged to avoid significant damage to the environment.
1		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.
1		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.
1		Who owns the mining claims?	Mr. Stefanus Johannes: The project owner or proponent is Telfs Investments (Pty) Ltd.
1	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.
1		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 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.
1	Mr. H. Engelbert: Henties Salt Works (Souwerke), Cape Cross/	Who is the owner of this project	Mr. Stefanus Johannes: The project is owned by Telfs Investments (Pty) Ltd.

No.	Name of the Speaker/Commenter	Comment/Issue/Suggestion	Response provided by:
2	neighbouring the project site	I will forward the document to the owner of the mine. I am not in a position to say much. Further communication will be done through your email before the cutoff date for communicating comments and concerns.	Mr. Stefanus Johannes: This is noted.

3. FINAL REMARKS AND CONCLUSION OF THE ENGAGEMENTS

3.1 What is the way forward after this meeting?

Mr. Johannes thanked the participating stakeholders for their time and comments. He informed stakeholders that their comments and recommendations will be included in the EIA Scoping Report and EMP that will be submitted to the Environmental Commissioner at the Department of Environmental Affairs and Forestry (DEAF) of the MEFT for evaluation and consideration of the ECC. The EIA documents (including meeting comments' minutes) will be shared with registered stakeholders (I&APs) for review and further comments. Following the review of the draft documents by stakeholders, the documents will be finalized and submitted to the Environmental Commissioner at the DEAF/MEFT for evaluation and consideration for an ECC.

STAKEHOLDER/PUBLIC CONSULTATION ATTENDANCE REGISTER


ENVIRONMENTAL IMPACT ASSESSMENT (EIA) 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 AN ECC

Project Proponent: *Telfs Investments (pty) Ltd*

Date & Time: *08 & 09 December 2025*

Venue: *E. Pongopong, MDEF Parks (DUMP), Nam Water, Henties Bay Municipality, Cape Cross Seals (MDEF), Cape Cross Lodge and Henties South Werke*

No.	Full Name & Surname	Name of Institution	Contact Number	Email Address (if any)	Signature
1.	<i>J. Gouch</i>	<i>MDEF</i>	<i>0813066791</i>	<i>Siegfried.gouch@ mdef.gov.na</i>	<i>[Signature]</i>
2	<i>Sarah Leonard</i>	<i>ELC</i>	<i>0813513376</i>	<i>leonard@erongo.gov.na</i>	<i>[Signature]</i>
3	<i>J. Vorster</i>	<i>Nam Water</i>	<i>0811272735</i>	<i>vorsterj@namwater.com.na</i>	<i>[Signature]</i>
4.	<i>T.F. NEIS</i>	<i>Henties Bay Mun</i>	<i>0812755891</i>	<i>Se. Corporate@hbaymun.com.na</i>	<i>[Signature]</i>

No.	Full Name & Surname	Name of Institution	Contact Number	Email Address (if any)	Signature
5	NADINE DOWNING	CAPE CROSS LODGE	081 244 0037	gm@capecross.org	
6.	Reneathe Dauson	Cape Cross Seals NEFT	0812095151	dauson.reneathe@gmail.com	
7.	A. Engelbust	Hester's Architecture	0812138828	hester@seattle.com	
8.					
9.					
10.					
11.					
12.					
13.					