

APP-007054
HARVESTING OF THE WHITE MUSSEL, DONAX SERRA, ALONG THE
NAMIBIAN COASTLINE, SOUTH OF SANDWICH HARBOUR

COMMENTS AND RESPONSES



Prepared by:



Prepared for:

Citygate Trading CC


April 2026

Note: No meetings were conducted and correspondence were via e-mail as presented below. Contact details of all parties are redacted as this document is released into the public domain. Contact details are on file with Geo Pollution Technologies.

Registered Interested and Affected Parties

Name	Organisation	Date Registered
Simeon Namweya	EIA Tracking and Monitoring in Namibia (EIA Tracker)	25 Feb 2026
Claudine Losper	Sperrgebiet Diamond Mining	27 February 2026
Carel Neethling	Sperrgebiet Diamond Mining	27 February 2026
Frank Löhnert	Private	10 February 2026
K. Kennedy	Ministry of Industries, Mines and Energy (Lüderitz)	24 Feb 2026
Rudolf Dausab	Living On The Edge	24 Feb 2026

Comments and Responses

Comment	Response
<p>From: Ms Kennedy (MIME) Date: 24 Feb 2026</p> <div style="text-align: center;">  REPUBLIC OF NAMIBIA </div> <hr/> <div style="text-align: center;"> MINISTRY OF INDUSTRIES, MINES AND ENERGY </div> <p> Tel.: +264 63 202583 Fax: +264 [Privacy Block] E-mail: K@mime.gov.na Website: www.mime.gov.na </p> <p style="text-align: right;">P. O. Box 934 LUDERITZ</p> <p>Enquiries: Mrs. Kennedy Reference: 19/1</p> <p>RE: FORMAL OPINION – Environmental Scoping Assessment and EMP for the Harvesting of White Mussel (<i>Donax serra</i>) North of Lüderitz</p> <p>Dear Mr., Faul,</p> <p>We refer to the Background Information Document dated 05 February 2026 regarding the application for an Environmental Clearance Certificate (ECC) for the proposed mussel harvesting, temporary camp establishment, and processing operations north of Lüderitz by Citygate Trading CC.</p> <p>While we note the approval granted by the Ministry of Environment, Forestry and Tourism (MEFT) for the establishment of accommodation facilities, this office hereby formally objects to the proposed operations as currently outlined.</p> <p>Furthermore, we emphasise that formal input and consultation with the relevant mining concession holders, as well as tourism concession holders operating within the affected area, is essential and must be duly considered as part of the assessment process.</p> <p>Our objection is based on the following grounds:</p> <p>1. Conflict with Shallow Mining Operational Plans</p> <p>The proposed temporary camp structures and associated operational footprint do not align with the Shallow Mining Operational Plans that have already been submitted to and are currently under review by this office.</p> <p>Approval of additional structures and activities within the same geographical footprint may compromise the integrity, planning, and future implementation of these mining operations. As such, this office cannot support or approve developments that are not aligned with the pending mining operational framework.</p> <p>2. Land Use and Concession Integrity</p> <p>Mining concession rights within the affected area carry legally binding obligations and operational requirements. These operations are governed by the provisions of the Diamond Act 13 of 1999, which impose strict access control, safety, and security measures.</p> <p style="text-align: center; font-size: small;">All official correspondence must be addressed to the Executive Director.</p>	<p>Your letter is well received.</p> <p>With reference to the letter, the following.</p> <p>To aid us in getting a better understanding I would like to get information on the following;</p> <ol style="list-style-type: none"> 1. Is the shallow mining plans as submitted to your office part of ML 46 of Sperrgebiet Diamond Mining and Namdeb? Or is it part of ML32 of Diamond Fields and NDC? 2. Has an environmental impact assessment been conducted for the shallow mining? If yes, can you please share this with us to enable us to align our EIA with theirs? <p>Once I have this information I can advise my clients on the best way forward with the process.</p>

The introduction of temporary camps and expanded third-party activities within mining concession areas may:

- Compromise controlled access requirements.
- Create operational and security risks.
- Undermine concession integrity; and
- Interfere with mandated compliance measures.

Mining concession holder consent and formal alignment are therefore prerequisites before any additional land use activities are considered.

3. Status of Current Operations

For clarity, this office has no objection to the harvesting and processing operations currently in place. We support the continuation of existing authorised activities, provided that:

- Reporting continues strictly in its current format and frequency; and
- No expansion into the contested areas identified in the new Scoping Report takes place until full alignment with the Shallow Mining Operational Plans has been achieved and formally approved.

In conclusion, our objection is limited to the proposed expansion and establishment of additional infrastructure within areas that conflict with pending shallow mining operations. Until proper alignment, consultation, and formal agreement are secured, this office maintains its objection to the project in its current proposed form.

Yours sincerely,

Katrina Kennedy
Chief Diamond Inspector
Luderitz Field Operations



Shallow water mining plans are not yet submitted but was discussed around the table for future. Both ML46 and ML32

SDM also shown interest in other minerals in ML46, this is also for future plans.

Our office do not receive EIA's...it is the baby of mining and MEFT..

Unfortunately, I will not be able to elaborate more because I did respond on their survey request.

Noted. The Proponent must engage with both ML46 and ML32 and reach agreements, if not already in place.

Comment	Response
<p>From: Mr Rudolf Dausab (Living On The Edge) Date: 24 Feb 2026</p>	
<p>Dear Sir</p> <p>I wish to tender my interest as an affected Concession Rightholder of the Northern Sand Sea Concession operating north of Luderitz and would like to understand how this project would influence my company Living On The Edge's operations.</p> <p>According to provided information your operations are right within the area of my concession and is going to have an impact my tourism operations as the unspoilt beaches are the main attraction the concession presents to our clients. According to the concession contract the concessionaire must be informed of any activity planned within the concession area.</p> <p>Please provide us with more information as this is crucial for our operations.</p> <p>Bellow my details: Mr. Rudolf Dausab</p>	<p>Thank you for your mail and I will register you as affected party for the project. Can you possibly share your concession contract and area boundaries with us so that we have all the information to address your concern? In the meantime, attached the background information document regarding the project. More information will be shared once we had time to address your concern in detail.</p>
<p>From: Mr Rudolf Dausab (Living On The Edge) Date: 12 Mar 2026</p>	
<p>I am aware of the provisions made in the contract especially research related activities within the same concession area.</p> <p>It is also very disturbing to realize the line ministries are not talking to each other when it comes to this very important conservation matters.as well as potential income generating business opportunities.</p> <p>The concession contract attached makes provision for exclusivity regarding the tourism operations. Hence, our products are sold as exclusive unspoiled, pristine eco systems which is a major selling point of this area due to its status as the "Sperrgebiet for over 100 years and proclaimed as the Tsau //Khaeb National Park.</p> <p>At this point not knowing how these developments might impact our tourism operations and marketing of the product as an exclusive unspoiled area might result in clients interpreting our marketing as misleading. The increase in vehicle movement in the concession area will contribute to the misconception if not handled with care.</p> <p>Having raised the above concerns it would be of importance to find a way to:</p> <ol style="list-style-type: none"> 1. mitigate the potential impact these operations might have on the tourism operations and our clients. 2. The proposed temporary camp within concession area must be clarified as this will for sure affect the quality of the tourism product we market and sell. 3. The area to be identified for the camp site construction and the size thereof to be clearly mark for input. 4. The proposed harvesting area for white mussel must be clarified hoping to limit visual impact as the area is sold as "pristine and untouched". 5. Whether any provision will be made in terms of compensation for the loss of value due to the loss of status as a pristine, unspoiled and untouched product sold to clients. In case the study indicates positive result. 	<p>The concession contract defines a concession as “the restricted and non-exclusive rights to conduct tourism activities...” Therefore, since it is a non-exclusive right, other activities may be allowed at the discretion of the concessor, which is the Ministry of Environment, Forestry and Tourism. Please refer to the map below, indicating the concession roads as green lines, and the proposed location of the campsite. The campsite is not close to the concession road (> 4 km away) and more than 5 km south of Anichab Pan. It will mostly be hidden from the view of any tourist activities.</p> <p>Only very small sections of the harvesting area will be targeted at a time. The Proponent should coordinate with you, so that, when you take tourists to the area, they harvest towards the southern end of the harvesting area (out of view from Anichab Pan). Harvesting in the north can be conducted on days when no tours take place. See the EMP for further mitigation measures which will ensure low visual impact and disturbance of the area.</p>

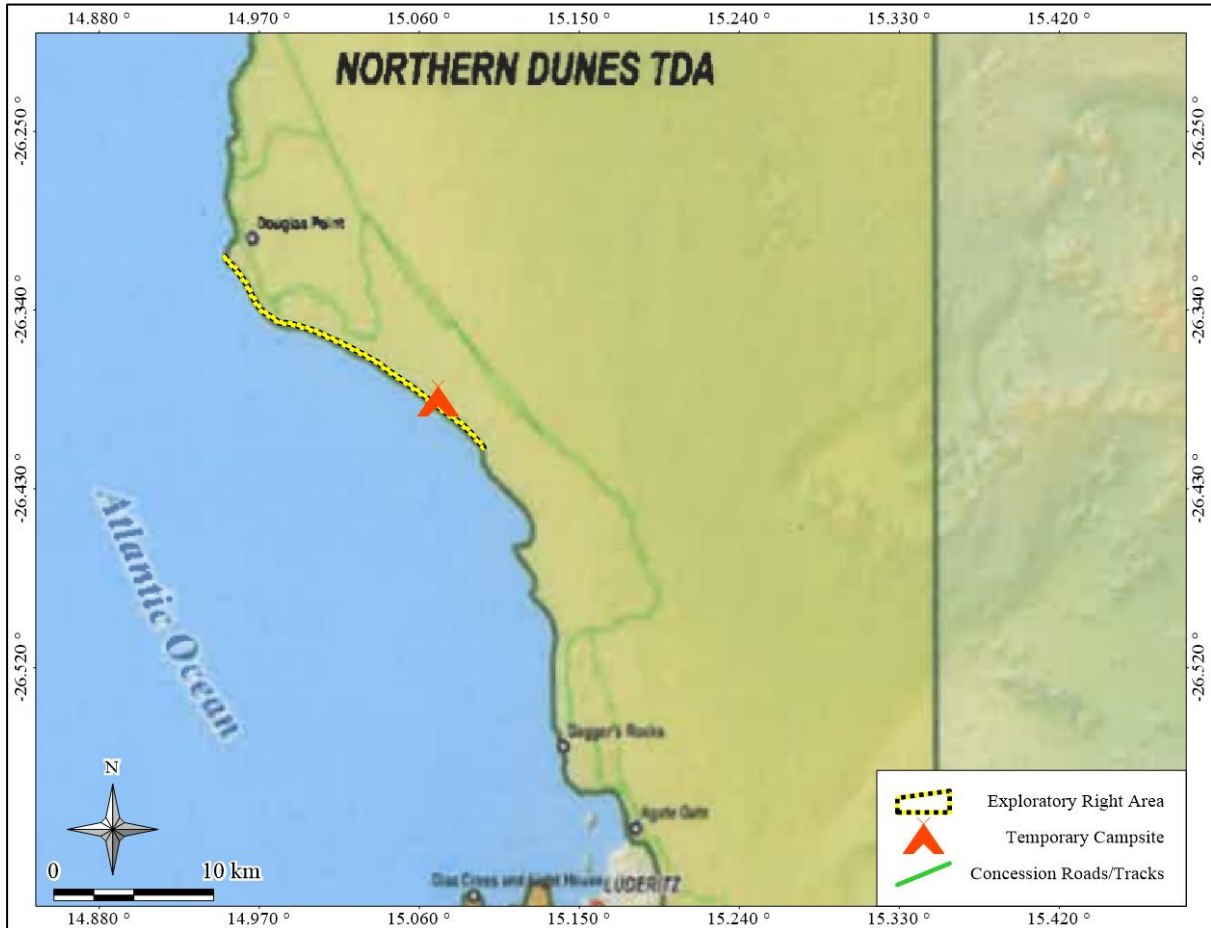
For more information please contact me on the following number 081#####.

I hope this finds you well.

Best Regards

Rudolf Dausab

Living on the Edge cc



Project components in relation to concession roads