

The Environmental Commissioner, Timoteus Mufeti
Ministry of Environment, Forestry and Tourism
Ministry of Environment and Tourism
Private Bag 13306
Windhoek

Dear Environmental Commissioner Mufeti,

PUBLIC COMMENTS, OBJECTIONS TO RENEWAL OF ECCs FOR EXPLORATION

I, (name)

ID No. / Passport No.

hereby strongly object to the issuance of an Environmental Clearance Certificate or a renewal of such Environmental Clearance Certificate for any of the following EPL's:

• **Green Mining**

250703006045 (EPL 7817)	250703006048 (EPL 7826)
250703006044 (EPL 7818)	250703006049 (EPL 7827)
250703006046 (EPL 7822)	250703006050 (EPL 7828)
250703006047 (EPL 7823)	250703006051 (EPL 7829)
(EPL 7824 if applicable)	250703006052 (EPL 7830)
(EPL 7825 if applicable)	

• **Uraplant Mining**

250703006042 (EPL 7795)	250703006040 (EPL 7798)
250703006038 (EPL 7796)	250703006039 (EPL 7799)
250703006041 (EPL 7797)	250703006043 (EPL 7800)

My objections are based on:

1.) Should exploration drilling continue, the underground water of the STAS (Stampriet Transboundary Aquifer System) also known as SAB (Stampriet Artesian Basin) has a high probability of being irreversibly contaminated.

2.) The STAS / SAB is a Water Protected Area as per the Water Resources Management Act 11 of 2013, prohibiting any drilling without a valid permit issued by the Ministry of Agriculture, Fisheries, Water and Land Reform.

3.) The Water Resources Management Act 11 of 2013 prohibits the pollution of water. *“Pollute”, in relation to water, means directly or indirectly to alter the physical, thermal, chemical, biological, or radioactive, properties of the water so as to render it less fit for any beneficial use for which it is or may reasonably be used or to cause a condition which is hazardous or potentially hazardous to –*

(a) public health;

(b) animals, birds, fish or aquatic life or other organisms; or

(c) plants.

4.) Detailed scientific studies of global in situ leach mining of uranium show that the amounts of dissolved uranium (with accompanying toxic levels of radionuclides and heavy metals) in the mine solution can be 30 000 times higher than the safe guideline for drinking water indicated by the World Health Organisation.

5.) It is our responsibility to protect the STAS / SAB for the livelihoods of approximately 100 000 Namibians who live there, for future generations and for our neighbouring countries South Africa and Botswana, who drink the same water.

6.) Has the Ministry obtained comprehensive and objective water flow models to understand the underground water flow? These models should be made publicly available for better understanding of what happens underground, where our drinking water is extracted.

7.) With this highly contentious project in which exploration for uranium could be allowed to continue in the drinking water of the STAS / SAB, public consultation is crucial. Was a Stakeholders Engagement Plan submitted by the proponent?

8.) Once again I&APs (Interested and Affected Parties) were not notified of the application for renewal of Environmental Clearance Certificates (ECC's) for the above listed EPL's for the continuation of exploration.

I implore that these objections and comments are considered serious and that no renewal and/or extension for the above ECCs for the continuation of exploration will be approved.

I herewith share my objections via e-mail.

- timoteus.mufeti@mefi.gov.na;
- damian.nchindo2@mefi.gov.na;
- info.pro@mefi.gov.na
- info@saumanamibia.org

Signed by

Date: