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Our Reference 20-0875

Your Reference APP-001838

2 September 2020

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

Dear Mr T Mufeti

APP-001838: ENVIRONMENTAL CLEARANCE CERTIFICATE RENEWAL FOR THE PROPOSED INSTALLATION OF MTC TELECOMMUNICATION STRUCTURES ON EXISTING STRUCTURES, STREETLIGHTS OR LAMP POLES, INDOOR SITES, FIBRE OPTIC CABLES AND TEMPORARY SITES THROUGHOUT NAMIBIA

Mobile Telecommunications Ltd (MTC hereafter) under their 081everyone project aims to provide 100% network coverage across Namibia. GCS Water and Environmental Engineering (Pty) Ltd (GCS Namibia hereafter) was appointed in 2017 to undertake the Environmental Assessment process to obtain environmental clearance for the intended development.

An application was submitted to the Ministry of Environment and Tourism (MET) dated 25 August 2017 (Annexure A) requesting for exemption from certain sites which were deemed to be “not environmentally sensitive”. These sites were assessed to fall within the following criteria:

- is an antennae only and/or
- is less than 1m high and/or
- is a non-permanent (temporary) structure and/or
- is an underground cable within the road reserve and
- Conforms to the International Commission on Non-Ionising Radiation Protection (ICNIRP) standards for non-ionising radiation to which Namibia subscribes.

Below is a list of network structures that are regarded as posing no to minimal environmental harm based on the criteria provided above:

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- **Existing structure:** This refers to sites where equipment is installed on an existing structure (building, water tank, billboard, etc.). It is usually used in populated areas to provide localized coverage and typically consist of an antenna or antennae with the associated cables only. It does not require construction only installation and is in line with the requirement of the Communications Act (No 8 of 2009) regarding the sharing of infrastructure.
 - **Streetlights or lamp pole:** These sites are usually 15 m high. They are used to provide localized coverage in urban areas and consist of an antenna on top of a streetlight or lamp pole. It is less visible and provide infill coverage and additional capacity in areas where there are spots with no coverage e.g. below a mountain.
 - **Indoor sites:** These sites provide localized coverage and are usually less visible. They are put up in shopping centers and airports to strengthen the signal and are designed to improve localized coverage. The antennae is installed on the wall or in the roof and provides infill coverage and additional capacity where there are a high number of users in a space.
 - **Fiber optic cables:** The cables consist of thousands of small glass tubes that are put underground in trenches along existing road servitudes. It provides connectivity from one point to another and usually run in straight lines within town boundaries. Because it is in the road servitude the area is considered disturbed. Health and safety standards are in place for the construction of these cables in an urban area.
 - **Temporary sites:** Temporary sites are put up in areas where temporary relief is required because of high congestion of existing networks before a permanent structure can be erected or in areas where coverage is only required for a short period, e.g. a sporting event. Temporary sites also provide localized coverage and consist of infrastructure that is not permanently constructed and that could be easily removed e.g. a van with antennae.

As such an Environmental Clearance Certificate (ECC) was issued to MTC for these “non environmentally sensitive” sites dated 28 September 2017 (Annexure B). As the ECC is only valid for 3 years from the date of issue the ECC is said to expire September 2020. MTC has thus appointed GCS Namibia to apply to MET for the renewal of the ECC.

Based on these initial findings, GCS Namibia do not foresee any activity during the proposed development that may pose a significant environmental risk to the biophysical or social environment on these sites.

However, it is recommended that, as a condition to the ECC MTC informs the applicable authorities (including the Directorate of Environmental Affairs), the landowner and the immediate neighbours to the site (where applicable) of the intent to erect/install the structure. This could be done as part of MTC's normal site acquisition process and should include a description of the technical information of the site (e.g. location, height, output, type of structure etc.).

With this, GCS Namibia on behalf of MTC is kindly requesting your office to consider the renewal of the ECC for the proposed activities as described in this letter.

Yours Sincerely,



Stephanie Strauss
Environmental Assessment Practitioner (GCS Namibia)