

25 September 2023

Mr. Timo Mufeti
Environmental Commissioner
Ministry of Environment, Forestry and Tourism (MEFT)
Department of Environmental Affairs (DEA)
Private Bag 13346
Windhoek
Namibia

Subject: Scoping (Including Impact Assessment) for the Proposed Horticulture Irrigation Activities, Located North-East of Oranjemund, Karas Region, Namibia.

Dear Mr. Mufeti

This letter serves to inform the Ministry of Environment, Forestry and Tourism (MEFT), as per the following:

1. On **14 February 2020**, the ECC application was registered on the online system with the *application no.:* 001127 (See attached in Annexure A). However, due to the Covid-19 pandemic, the relevant reports and documents could only be uploaded on **3 September 2021** (See attached in Annexure B).
2. On **4 November 2021**, MEFT forwarded the application to MAWLR for consent (See attached in Annexure C). It was indicated that the consent was directly sent to MEFT by MAWLR.
3. In **September 2022**, the application was forwarded to the Directorate of Wildlife and National Parks for review and comment.
4. On **17 October 2022**, the comments (from Parks) were sent to I.N.K via email by the DEA (See attached comments in Annexure D). These comments have been addressed in Scoping and EMP reports (See Annexure E).
5. On **31 October 2022**, a new *application no.:* 221031000223 was allocated due to the crashing of the online system.

In addition, the water abstraction permit issued by MAWLR and the consent letter from the Oranjemund Town Council are attached in Annexure F and Annexure G, respectively.


I trust the above is sufficient to provide the MEFT with a tracking of the proposed project. Please let us know if there is any further information that your Department might require.

Yours Sincerely,



Immanuel N. Katali
Lead Practitioner and Project Manager

Annexure A
Proof of Project Registration on 14 February 2020

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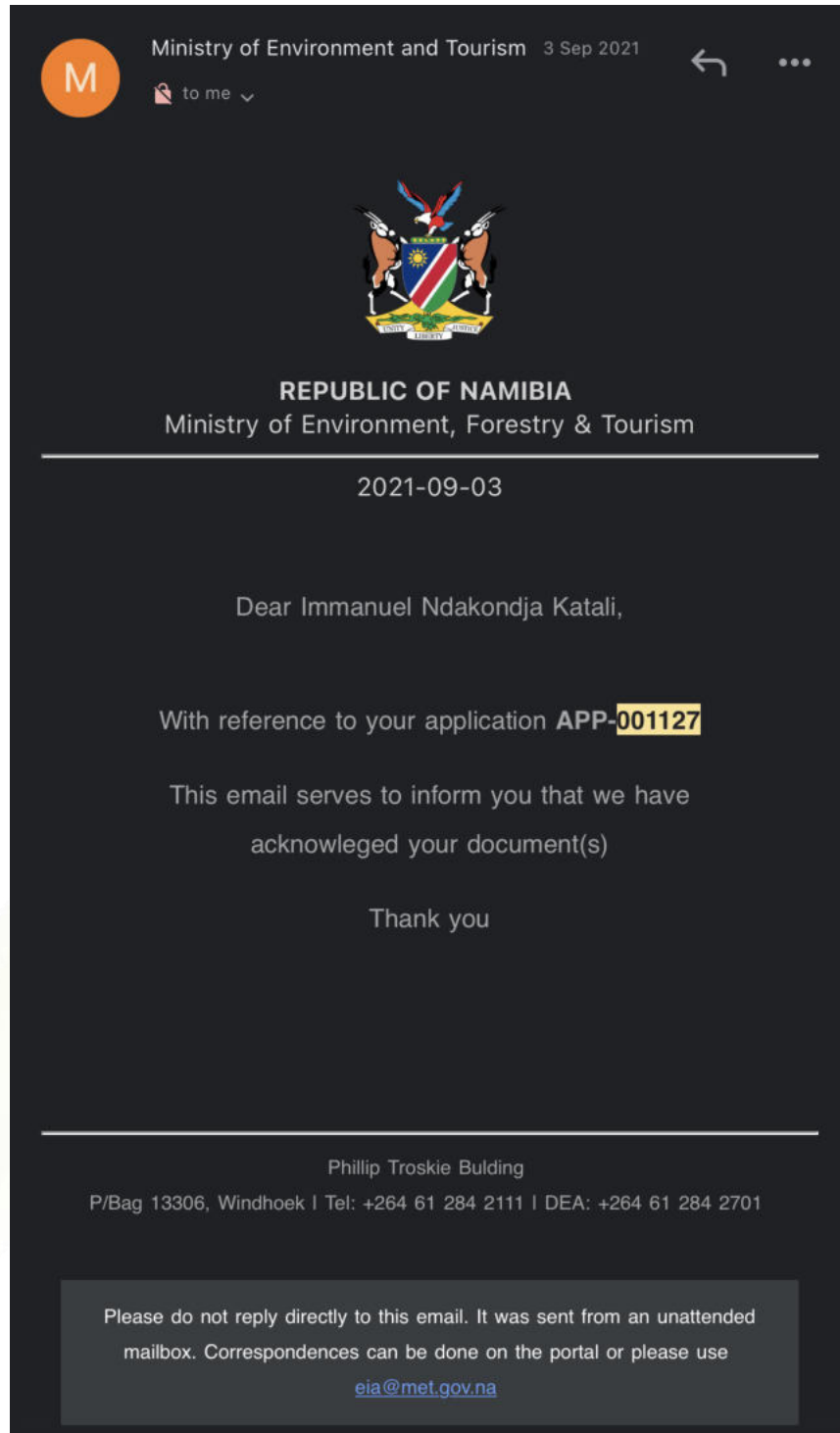
damage and disruptions of classrooms due to the flooding. Furthermore, the project i...

APP-001127	Galore Trading's Horticulture Irrigation Project located approximately 2 km east of Oranjemund Town, Karas Regio, Namibia Galore Trading cc, intends to construct and operate a horticulture irrigation project, located ±2 km east of Oranjemund, on two bordering agricultural plots measuring a total of 64 hectares (ha) (Figu...	14-Feb-2020	REVIEW IN PROGRESS	Submit files Get Application Submit proof of payment
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Annexure B

Proof of report and documents upload on 3 September



Annexure C

Proof of forwarding of Application to MAWLR on 4 November 2021



REPUBLIC OF NAMIBIA
Ministry of Environment, Forestry & Tourism

2021-11-04

Dear Immanuel Ndakondja Katali,

With reference to the application: **APP-001127**

Your Application has been referred to the following Organ of State for further consultation:

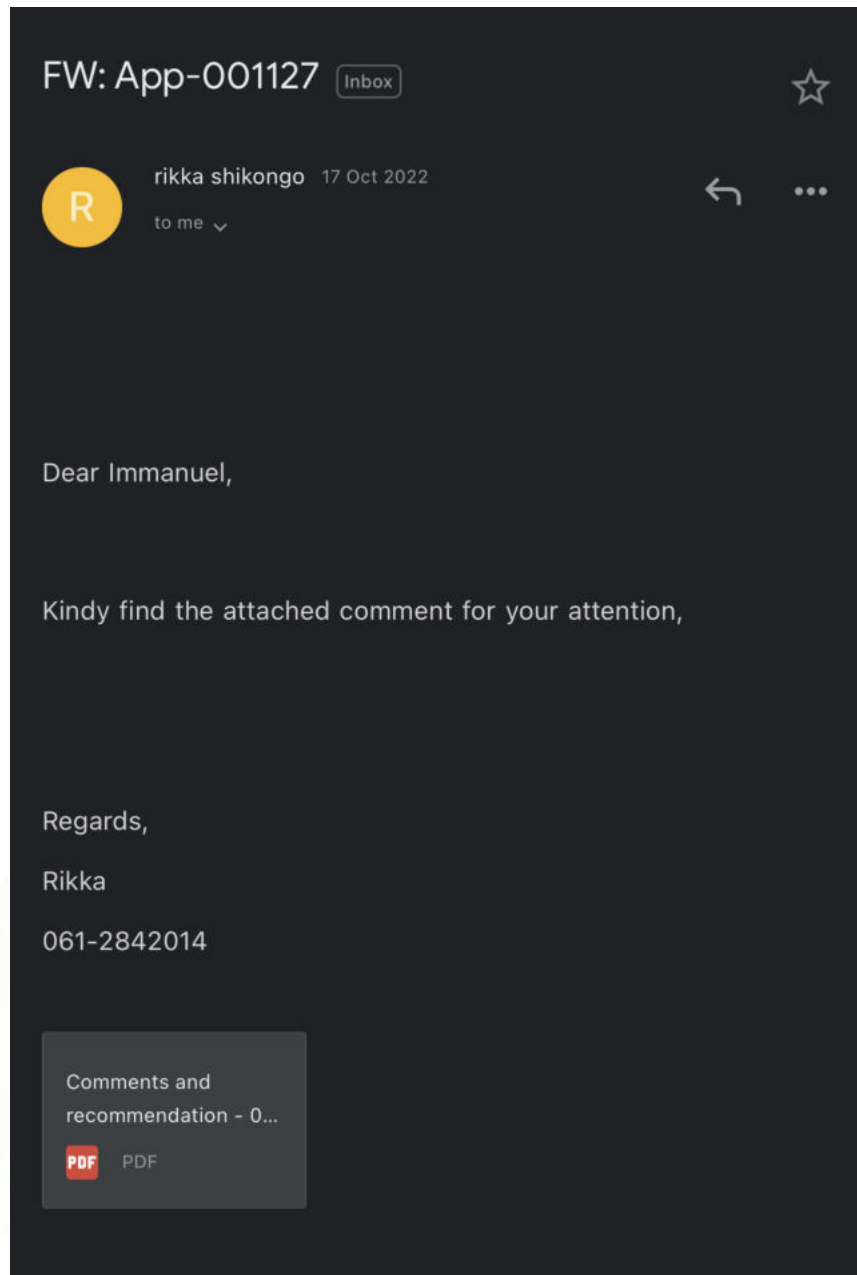
Ministry of Agriculture

We will update you further when we have received the application back after consultation.

Thank you

Annexure D

Proof of Comments from Parks on 17 October 2022



Re: Application for an Environmental Clearance Certificate for the proposed horticulture irrigation project located approximately 2 km east of Oranjemund town, //Karas Region.

1. Introduction and background

- 1.1. Galore Trading cc, intends to construct and operate a horticulture irrigation project, located 2 km southeast of Oranjemund, on two bordering agricultural plots, made available by Oranjemund Town Council and measuring a total of 64 hectares (ha).
- 1.2. The project aims to produce fruits and vegetables (onion, tomato, green pepper, carrot, pumpkins and cabbage) in the early stages and expand to various other crops in the future, pending further suitability investigations.
- 1.3. The water for the irrigation project is proposed to be abstracted from the Orange River (located approximately 1 km east of the project site) to the irrigation site via underground pipeline and with the use booster pumps near the river.
- 1.4. The irrigation project aims to abstract water from the Orange River of approximately 1 million cubic meter per year.

2. Ecological and Conservation implications

- 2.1 Vegetation clearing and mechanized material excavation will result in soil erosion and soil degradation even though the area is considered as flat and have no river catchments found.
- 2.2 The project site is located in an area known as the Orange River Mouth Ramsar Site. These

are sites selected worldwide to help protect wetlands of international importance.

2.3 The road development in the long term will likely cause disruptions to wildlife habitats and the migratory bird routes due to its proximity to local forest and conservation areas.

3. Limitations/weaknesses of the EIA and associated EMP

- 3.1 The project does not mention the type of wildlife occurring the area and how they will be affected by this proposed construction.
- 3.2 The project is silence on the impacts of soil erosion and soil degradation which is the major impact in this proposed project and the loss of soil fertility as a result of washing away of humus and natural nutrients.
- 3.3 The irrigation farming tend to use high amount water and the project fail to mention the quantity of water to be used especially during the dry season from the river.
- 3.4 The project does not give clear effects on residence bird's species and migratory birds around the Orange River. The area house over quiet a number of endangered species of birds and some are endemic.

No mention is made of baboons and vervet monkeys and how they will be dealt with. These two species will no doubt be the biggest problem at a project of this nature. Both occur there.

The fields may attract large numbers of birds such as Egyptian Geese. How will this be dealt with?

In addition, the Park Management Plan must be consulted to determine which zone is this proposed project in, and whether the requirements of such zone can be met.

Annexure E
Responses to Comments from Parks

3.1. The project does not mention the type of Wildlife occurring in the area and how they will be affected by this proposed construction.

Addressed in section 6.8.2 in Scoping Report and in EMP under Biodiversity Mitigation Measures.

3.2. The Project is silence on the impacts of soil erosion and soil degradation which is the major impact in tthis proposed project and the loss of soil fertility as a result of washing away oh humus and natural nutrients.

Addressed in the EMP under Soil and Groundwater Contamination

3.3. The Irrigation farming tend to use high amount of water and the project fail to mentiion the quantity of water to be used especially during the dry season from the river.

The irrigation project aims to abstract water from the Orange River of approximately 1.2 million m³/annum (Included in Report). A water permit was issued by Water Affairs.

3.4. The project does not give clear effects on residence bird's species and migratory birds around the Orange River. The area house over quite a number of endangered species of birds and some are endemic.

Addressed in section 6.8.3 and relevant mitigation measures included in EMP under Biodiversity.

No mention is made of baboons and vervet monkeys and how they will be dealt with. These two species will no doubt be the biggest problem at a project of this nature. Both Occur there.

Addressed in section 6.8.2 in scoping Report and relevant mitigation measures included in EMP uunder Biodiversity.

The fields may attract large numbers of birds such as Egyptian Geese. How will this be dealt with?

Addressed in section 6.8.3 and relevant mitigation measures included in EMP under Biodiversity.

In addition, the park management plan must be consulted to determine which zone is this proposed project in, and whether the requirement of such zone can be met.

The project area is within the Oranjemund Town Council boundary and is earmarked and zoned for horticultural production.

Annexure F
Water Abstraction Permit



REPUBLIC OF NAMIBIA

MINISTRY OF AGRICULTURE, WATER AND LAND REFORM

Telephone: (061) 2087228
Fax: (061) 2087697
Enquiries: J N Mouton
Reference: 9/3/3/3

Government Office Park
Private Bag 13184
Windhoek
9000

The Director
Mr. Simon A Shikokola
Galore Trading CC
P.O. Box 41249
Ausspannplatz
WINDHOEK

Dear Mr. Shikokola

APPLICATION FOR A PERMIT FOR THE ABSTRACTION OF WATER FROM THE ORANGE RIVER FOR IRRIGATION AND HORTICULTURE PURPOSES ON A PORTION OF ORANJEMUND TOWN AND TOWNLANDS, ORANJEMUND DISTRICT

1. The above-mentioned application has been approved. Attached please find permit number 11 628 which authorizes the abstraction of water from the Orange River for irrigation and horticulture purposes.
2. Please be informed that the water abstraction permit is subjected to compliance with the Water Act 56 of 1956, the new Water Act No.11 of 2013 and the Environmental Management Act No. 7 of 2007.
3. You are kindly requested to comply with all the permit conditions, especially to conditions number 5, 6 and 9.

Yours Sincerely



Ndiyakupi Nghituwamata (Ms)
ACTING EXECUTIVE DIRECTOR



REPUBLIC OF NAMIBIA

MINISTRY OF AGRICULTURE, WATER AND LAND REFORM

Telephone: (061) 2087228
Fax: (061) 2087697
Enquiries: J N Mouton
Reference: 9/3/3/3

Government Office Park
Private Bag 13184
Windhoek
9000

PERMIT NUMBER: 11 628

DATE: 09 MARCH 2022

PERMIT ISSUED IN TERMS OF SECTION 7 (aA) OF THE WATER ACT, 1956 (ACT 54 OF 1956), AS AMENDED AND AS APPLICABLE ON A PUBLIC STREAM.

NAME OF PERMIT HOLDER : Galore Trading CC
ADDRESS : P O Box 41249, Ausspannplatz, Windhoek
REGISTERED PROPERTY : A portion of Oranjemund Town and Townlands
DISTRICT : Oranjemund
RIVER/AREA WHERE WATER MAY BE ABSTRACTED : Orange River
VALIDITY PERIOD : 5 (Five) years
PURPOSES FOR WHICH WATER MAY BE USED : Irrigation and Horticulture
MAXIMUM ABSTRACTION PER YEAR: 1.2 M m³

MAXIMUM ABSTRACTION PER DAY : 3 500 m³ during peak periods

This permit authorizes the abstraction and use of water for irrigation and horticulture purposes from the Orange River, subject to the following conditions:

1. The validity period shall be from 31 March 2022 to 30 March 2027, but the permit will be renewed in accordance with the performance of the permit holder to utilize the allocated water as planned and to keep to the permit conditions.

All official correspondence must be addressed to the Executive Director

2.

2. An application for the extension of the validity period shall be in the possession of the Executive Director at least 6 (six) months before the expiry date of the permit.
3. This permit is incident to the property and if the present owner sells the property, the permit shall be handed over to the new owner.
4. No embankment or structure which could dam up or impede the normal flow of the water in the river may be constructed around the abstraction installation.
5. The permit holder shall pass all water abstracted through a water meter and shall bear all costs for the supply, installation and maintenance of this meter. The permit holder shall consult the Executive Director about the specifications of the water meter and must inform the Executive Director after the water meter had been commissioned so that an inspection can be conducted to confirm that the installation is to the satisfaction of the Executive Director.
6. The permit holder shall keep a daily record of the water abstracted and the total quantity of water abstracted on a monthly basis must be submitted at quarterly intervals on or before the 10th day of the following quarter, in respect of the previous quarter, to the Control Officer: Abstraction Control, Private Bag 13193, Windhoek, 9000. If no water was abstracted during a quarter, a form with a nil return must be submitted. The permit holder shall also state the number of hectares irrigated in the month concerned. If the permit holder fails to send in returns regularly, this could lead to the withdrawal of the permit.
7. The permit holder shall take the necessary measures to use the water allocated for abstraction in the most efficient and beneficial way. All water installations such as reservoirs, pipes, taps, troughs and reticulation systems must be leak proof to prevent any loss or wastage of water.
8. All cost to pump water from the river will be at the expense of the permit holder.
9. The permit holder shall pay a tariff of N\$7-27/ha/annum in respect of the first 30 (thirty) hectares of land under irrigation as well as a fixed tariff of N\$37-34/ha/annum for each additional hectare irrigated. The Executive Director shall supply the permit holder with an annual statement of account based on the abstraction figures supplied by the permit holder. If no abstraction figures are submitted by the permit holder, the Executive Director shall supply an account for the maximum quantity of water allocated in terms of this permit. Payment for the water may be made at the office of the Veterinary Services of the Ministry of Agriculture, Water and Land Reform at Karasburg under the revenue code number 312022777 for the sale of water. A copy of the receipt must then be submitted to the office in Windhoek with your next quarterly return.

3.

PERMIT FOR THE ABSTRACTION OF WATER FROM THE ORANGE RIVER FOR IRRIGATION AND HORTICULTURE PURPOSES ON A PORTION OF ORANJEMUND TOWN AND TOWNLANDS, ORANJEMUND DISTRICT – PERMIT NUMBER 11 628 – GALORE TRADING CC

10. The permit holder is not allowed to discharge waste water or any other harmful substances into the river or to re-use the said substances in such a manner or perform any act which could pollute the water, including subterranean water in such a way as to render it less fit for:
 - (a) the purposes for which it is or could ordinarily be used by other persons; or
 - (b) the propagation of fish or other aquatic life; or for
 - (c) recreation or other legitimate purposes.
11. The Executive Director or his authorized representative, in consultation with the Honourable Minister shall have the right to:
 - (a) amend, replace or withdraw any condition of this permit or
 - (b) withdraw this permit in its entirety, after reasonable notice to the permit holder, and
 - (c) inspect the irrigation scheme at all reasonable times to determine whether the permit conditions are adhered to.
12. The Executive Director cannot guarantee the quality of the water available for abstraction and cannot accept liability for damage or loss suffered by the permit holder should the relevant source wane or run dry or the period of validity of the permit cannot be extended or renewed for any reason which is beyond the control of the Executive Director.
13. When water restrictions are introduced due to drought conditions or other limitations on the availability of water, the permit holder shall comply with the instructions of the Executive Director.
14. Should the permit holder not comply with any of the permit conditions:
 - (a) the permit holder may be held liable for any costs which the Executive Director may incur as a result thereof, and
 - (b) the permit holder shall be guilty of an offence and shall, on conviction, be liable to the penalties prescribed in Section 170 of the Water Act, 1956 (Act 54 of 1956).


Ndiyakupi Nghituwamata (Ms)
ACTING EXECUTIVE DIRECTOR


EXECUTIVE DIRECTOR
2022 -03- 1 1
Ministry of Agriculture, Water and Land Reform
Republic of Namibia

Annexure G
Consent from Oranjemund Town Council



Oranjemund Town Council

C/o 8th and 12th Avenue, P.O Box 178, Oranjemund | Tel: +264 63 233 500 Fax: +264 63 233501

Enquiries: Mr. J. Ndipwashimwe

Our Ref:

Wednesday, April 24, 2018

The Directors
Galore Trading Cc
P.O Box 41249
Ausspannplatz, Windhoek

Dear Mr Shikokola and Mr Nuuyoma,

RE: NON-BINDING LETTER OF INTENT FOR THE ALLOCATION OF 62 HECTARES OF LAND FOR HORTICULTURAL PRODUCTION FROM ORANJEMUND TOWN COUNCIL

This letter serves to acknowledge that Oranjemund Town Council (OTC) is aware of ongoing engagements with Galore Trading Cc including two presentations made to Council on the above development proposal as well as for land allocation to the project, which was confirmed on our letter dated 4th February 2019. The Oranjemund Agro Processing Project is in line with the Council's objectives of expanding the economic activities of the town and reduces the dependence from mining activities.

The Oranjemund Town Council has identified a 60 hectare of land, earmarked for agricultural production within the town boundary to Galore Trading Cc for horticultural production. The preliminary allocation of agricultural land to Galore Trading Cc is intended to facilitate the funding for the project and to allow Galore Trading Cc to undertake pre-feasibility technical studies including and not limited to soil testing, land preparation, water analysis, environmental impact assessment and energy requirement.

Therefore, this letter services to confirm that Galore Trading Cc has been allowed by Council Resolution:114/11/18R(i)(iii)(a) to conduct feasibility studies as stated above on the identified land for horticultural production within three months at own costs as well as for Galore Trading to make further necessary arrangements for the Agro processing Project to commence within the projected



All official correspondence must be addressed to the Chief Executive Officer.



Oranjemund Town Council

time frame to be agreed upon between the two parties. Oranjemund Town Council will be available for consultations on the subject within its jurisdiction.

Yours Sincerely,

Shali Akwaanyenga
CHIEF EXECUTIVE OFFICER





Oranjemund Town Council

C/o 8th and 12th Avenue, Box 178, Oranjemund | Tel: +264 63 233 500 Fax: +264 63 233501

Enquiries: Mr. Jason Ndipvashimwe

Our Ref: 9/5/1

4th January 2021

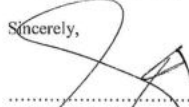
Ink Enviro Consultants
PO Box 31908
Pionerspark
WINDHOEK

Attention: Mr Immanuel Katali

ENVIRONMENTAL IMPACT ASSESSMENT AT ORANJEMUND FOR HORTICULTURE IRRIGATION PROJECT

1. The above-mentioned subject has reference.
2. This Letter serves to confirm that Oranjemund Town Council is acquainted with the activities of Galore Trading CC's Proposed Horticulture Irrigation Project in the Agriculture Sector, in the Oranjemund Constituency.
3. Therefore, the Council is in support of its endeavour to acquire the necessary documents from relevant authorities in relation to their business activities.
4. For any queries, please do not hesitate to contact our Office at 063-233 500.

Sincerely,


.....
Shali Akwaanyenga
Chief Executive Officer



All official correspondence must be addressed to the Chief Executive Officer.