

**REPUBLIC OF NAMIBIA**  
**ENVIRONMENTAL MANAGEMENT ACT, 2007**  
**(SECTION 32)**

APPLICATION FOR ENVIRONMENTAL CLEARANCE CERTIFICATE

Revenue  
stamp or  
revenue  
franking  
machine  
impression

**PART A : DETAILS OF APPLICANT**

1.Name:

Mobile Telecommunications Ltd

2. Business Registration/Identity No.

(if applicable)

N/A

3.Correspondence Address:

PO Box 23051, Windhoek

4.Name of Contact Person:

Gert Vermeulen

5.Position of Contact Person:

Manager Planning

6.Telephone No.:

+264818882623

7.Fax No.:

N/A

8.E-mail Address:

*gvermeulen@mtc.com.na*

## **PART B: SCOPE OF THE ENVIRONMENTAL CLEARANCE CERTIFICATE**

### **1.The environmental clearance certificate is for:**

Activity 10.1 (g) (Infrastructure) The construction of communication networks including towers, telecommunication and marine telecommunication lines and cables;

### **2. Details of the activity(s) covered by the environmental clearance certificate:**

Note: Please attach plans to show the location and scope of the designated activity(s), and use additional sheets if necessary:

#### **Title of Activity**

- 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

#### **Nature of Activity:**

The project involves the following:

- 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

#### **Location of Activity:**

Namibia

#### **Scale and Scope of Activity:**

The scope of this project is limited to obtaining an Environmental Clearance Certificate for the following:

- 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

### **THE PROPOSED DEVELOPMENTS**

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.

As such an initial Environmental Clearance Certificate (ECC) was issued to MTC for these “non environmentally sensitive” sites dated 28 September 2017 (Annexure B)

On 2 September 2020 a renewal application was submitted to Ministry of Environment Forestry and Tourism, as such an ECC was issued to MTC for these “non environmentally sensitive” sites dated 2 November 2020 (Annexure C).

As the ECC is only valid for 3 years from the date of issue the ECC is said to expire November 2023. MTC has thus appointed GCS Namibia to apply to MEFT for the renewal of the ECC.

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

- 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.

**OPINION WITH RESPECT TO THE ENVIRONMENTAL AUTHORISATION**

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 exemption 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.).

As a result, we are of the opinion that there is no need for a full Environmental Impact Assessment study to be conducted for the reason that the significant effects associated with the proposed developments are minimal.

**PART C: DECLARATION BY APPLICANT**

I hereby certify that the particulars given above are correct and true to the best of my knowledge and belief. I understand the environmental clearance certificate may be suspended, amended or cancelled if any information given above is false, misleading, wrong or incomplete.

 _____ Signature of Applicant	<u>Victoria Shikwaya</u> Full name in Block Letters	<u>Environmental Consultant</u> Position
on behalf of <u>Mobile Telecommunications Ltd</u>		<u>25 October 2023</u> Date



45 Feld Street, Windhoek, Namibia  
PO Box 81808, Windhoek, Namibia  
Tel: (+264) 61 248 614 Fax: (+264) 61 238 586 Web: [www.gcs-na.biz](http://www.gcs-na.biz)

Our Reference 23-0868

Your Reference APP-002377

25 October 2023

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

Dear Mr T Mufeti

**APP-002377: 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:

- 
- **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). On 2 September 2020 a renewal application was submitted to Ministry of Environment Forestry and Tourism, as such an ECC was issued to MTC for these “non environmentally sensitive” sites dated 2 November 2020 (Annexure C).

As the ECC is only valid for 3 years from the date of issue the ECC is said to expire November 2023. MTC has thus appointed GCS Namibia to apply to MEFT for the renewal of the ECC.

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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,



Victoria Shikwaya

Environmental Assessment Practitioner (GCS Namibia)

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**ANNEXURE A: ECC APPLICATION DATED 25 AUGUST 2017**





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PO Box 81808, Windhoek, Namibia  
Tel: (+264) 61 248 614 Fax: (+264) 61 238 586 Web: [www.gcs-na.biz](http://www.gcs-na.biz)

Our Reference GCS Ref - 17-0079

Your Reference

25 August 2017

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

Dear Mr Nghitila,

## **ERECTION OF MTC NETWORKS ACROSS NAMIBIA: REQUEST FOR EXEMPTION FOR CERTAIN ACTIVITIES**

### **1 BACKGROUND**

Mobile Telecommunications Ltd (“MTC” hereafter) aims to provide Namibia with a 100% network coverage within the next three to five years. In order to achieve this, MTC approached GCS Water Environmental Engineering Namibia (Pty) Ltd to assist with the Environmental Assessment process.

The current *Environmental Management Act, No. 7 of 2007* states that development of all “communication networks including towers, telecommunication and marine telecommunication lines and cables” require an EIA process for environmental clearance. This definition includes fibre optic lines, indoor antennae, antennae on existing infrastructure, temporary sites, as well as base transceiver stations (BTS) of various heights.

### **2 ENVIRONMENTAL SENSITIVITY**

During a meeting with your Department on the 29<sup>th</sup> of June 2017 (see minutes attached) the approach to a Strategic Environmental Assessment Process was presented which included the identification of some Telecommunication sites that are regarded as “*not environmentally sensitive*”. These sites were identified based on consultations with various specialists or experts in their fields namely:

- Birds (Mike and Ann Scott - African Conservation Services)
- Ecology (Carol Steenkamp - Private Consultant)
- Archaeology (Alma Nankela - National Heritage Council)
- Radiation (Joseph Eiman - Radiation Protection Authority of Namibia (Ministry of Health and Social Services))

- Civil Aviation (Department of Civil Aviation (Ministry of Works and Transport))
- Social Impact (Alex Maurtau Konstantinidi - Sociologist at GCS Water & Environmental Consultants)
- Visual (Prevlan Chetty - Visual Assessment and GIS specialist at GCS Water & Environmental Consultants).

This panel of specialists identified criteria that would define a non-sensitive site. It:

- 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.

The sites identified as *not environmentally sensitive* falls in one or a combination of these criteria.

### 3 ACTIVITIES FOR WHICH ENVIRONMENTAL EXEMPTION IS REQUESTED

Under Section 28 of the Environmental Management Act (Act 7 of 2007) the Minister may grant an exemption in respect of an activity and may describe conditions to which such exemption may be granted.

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

- **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.



Figure 1: Example of equipment on existing structures (left - on top of a building) (right - inside a billboard). Photos from MTC.

- **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.



*Figure 2: Streetlight or lamp pole site*



*Figure 3: Indoor antennae provides localized coverage in areas where there are a high number of users in a specific space e.g. a mall.*

- **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.



*Figure 4: Fibre optic cables are put in trenches in the existing road reserve.*

- **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.

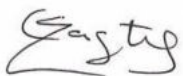
#### 4 CONDITIONS FOR ENVIRONMENTAL EXEMPTION

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 exemption 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, MTC is kindly requesting your office to consider exemption for the proposed activities as described in this letter.

Yours Sincerely,



Eloise Carstens

Environmental Assessment Practitioner (GCS Namibia)

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**ANNEXURE B: ECC DATED 28 SEPTEMBER 2017**



REPUBLIC OF NAMIBIA

## MINISTRY OF ENVIRONMENT AND TOURISM

Tel: (00 26461) 284 2111  
Fax: (00 26461) 229 936

Cnr Robert Mugabe &  
Dr Kenneth Kaunda Street  
Private Bag 13306  
Windhoek  
Namibia

E-mail: [hiskia.mbura@met.gov.na](mailto:hiskia.mbura@met.gov.na)  
Enquiries: Mr. Hiskia Mbura

28 September 2017

### OFFICE OF THE ENVIRONMENTAL COMMISSIONER

Mr. Miguel Gerales  
Managing Director  
P.O. Box 23051,  
Windhoek, 9000  
Namibia

Dear Mr Gerales

#### SUBJECT: ENVIRONMENTAL CLEARANCE CERTIFICATE FOR THE PROPOSED INSTALLATION OF TEMPORARY MTC TELECOMMUNICATION ANTENNAE ON EXISTING INFRASTRUCTURES THROUGHOUT NAMIBIA

The Environmental Scoping Report and Environmental Management Plan submitted are sufficient as it made provisions of the environmental management concerning the project's activities. From this perspective regular environmental monitoring and evaluations on environmental performance should be conducted. Targets for improvements should be established and monitored throughout this process.

This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project. In addition, the Environmental clearance certificate is issued with the condition that: all applicable and required permits or consent from relevant affected stakeholders and authorities is obtained before any installations are done.

On the basis of the above, this letter serves as an environmental clearance for the proposed installation of temporary mobile telecommunication antennae on existing infrastructures throughout Namibia. However, this clearance letter does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with MTC Namibia and its consultants.

This environmental clearance is valid for a period of 3 (three) years, effective from the date of issue unless withdrawn by this office.

Yours sincerely,

  
Teofilus Nghitila  
ENVIRONMENTAL COMMISSIONER



**“Stop the poaching of our rhinos”**

All official correspondence must be addressed to the Permanent Secretary





**REPUBLIC OF NAMIBIA  
MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM**

OFFICE OF THE ENVIRONMENTAL COMMISSIONER

**ENVIRONMENTAL CLEARANCE CERTIFICATE**

**ISSUED**

In accordance with Section 37(2) of the Environmental  
Management Act (Act No. 7 of 2007)

TO

Mobile Telecommunications Ltd  
P. O. Box 23051, Windhoek

TO UNDERTAKE THE FOLLOWING LISTED ACTIVITY

Management and operation for the installation of MTC Telecommunication  
Antennae on existing Infrastructures throughout Namibia, Khomas  
Region

Issued on the date: 2020-11-02  
Expires on this date: 2023-11-02



(See conditions printed over leaf)





### CONDITIONS OF APPROVAL

1. This environmental clearance is valid for a period of 3 (three) years, from the date of issue unless withdrawn by this office
2. This certificate does not in any way hold the Ministry of Environment and Tourism accountable for misleading information, nor any adverse effects that may arise from these activities. Instead, full accountability rests with the proponent and its consultants
3. This Ministry reserves the right to attach further legislative and regulatory conditions during the operational phase of the project
4. All applicable and required permits are obtained and mitigation measures stipulated in the EMP are applied particularly with respect to management of ecological impacts
5. Strict compliance with national heritage guidelines and regulations is expected throughout the life-span of the proposed activity, therefore any new archaeological finds must be reported to the National Heritage Council for appropriate handling of such
6. A six monthly report on project progress and environmental management profile, starting from date of commencement of operations, must be submitted by the Proponent to Office of Environmental Commissioner