



REPUBLIC OF NAMIBIA

MINISTRY OF FISHERIES AND MARINE RESOURCES

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Date: 27 November 2023

The Executive Director
Ministry of Environment, Forestry and Tourism
P/Bag 13306
WINDHOEK

Dear colleague,

SUBJECT: RECOMMENDATIONS ON THE ENVIRONMENTAL IMPACT ASSESSMENT, ENVIRONMENTAL MANAGEMENT REPORT AND MARINE SPECIALIST REPORT FOR MARINE AQUACULTURE DEVELOPMENTS IN SWAKOPMUND, WALVIS BAY AND LUDERITZ, NAMIBIA.

The Ministry of Fisheries and Marine Resources (MFMR) reviewed the Environmental Impact Assessment and Environment Management Plan (EMP) and Marine Specialist Reports submitted by KPM Environmental Consulting on 16 October 2023, on behalf of the MFMR in collaboration with the Benguela Current Commission (BCC), in support of an Environmental Clearance Certificate (ECC) application.


The MFMR recommends that the Environmental Clearance Certificate is granted with the following conditions;

1. The ECC is limited to the following fish species ONLY: Pacific Oyster (*Crassostrea gigas*), Black Mussels (*Choromytilus meridionalis*), Scallops (*Argopecten purpuratus*), Abalone (*Haliotis midae*), Kelp/seaweed (Laminaria and Ecklonia species), West Coast Rock Lobster (*Jasus lalandii*), Sea Cucumber (Holothuroidea species), Tilapia (*Oreochromis niloticus*), Yellowtail Kingfish (*Seriola lalandi*), Dusky Kob (*Argyrosomus 1aponicas*), Silver Kob (*Argyrosomus japonicas*), Atlantic Salmon (*Salmo salar*), Galjoen (*Dichistius*

capensis), Steenbra (*Lithognathus auretii*), and Blacktail (Dassie/Kolstert) (*Diplodus sargus capensis*).

2. The proponent should implement and adopt all objectives, mitigation measures and targets set out in the environmental management plan.
3. The proponents should develop a biosecurity protocol and management plan which should be submitted to MFMR.
4. Fish eggs, fry and fingerlings and their transport medium (i.e. water) must be tested for diseases, viruses and pathogens.
5. All fish products are subjected to tests as prescribed by the Directorate of Aquaculture mandated by the Aquaculture Act, 2002.
6. The use of growth hormones on fish is prohibited, due to the detrimental effects on both environmental and human health.
7. Vaccines on fish must be undertaken on land based facilities only.
8. The use of antibiotics on fish should be used at minimum.
9. Independent environmental monitoring by MFMR Aquaculture Directorate should be done.
10. The proponents must develop decommissioning plans for farm sites that are closing down, to ensure all waste elements (including plastic) are disposed of responsibly.
11. Predator deterrent measures such as using lights, crackers and explosives or shooting is prohibited.
12. Wildlife stranding of birds and marine mammals should be reported to MFMR.
13. No landing or anchoring rubberduck or access to any island, islet or rock on the Islands without permission from MFMR.
14. Hard copies of environmental monitoring reports must be submitted to the MFMR Directorate: Resource Management and to the MFMR Directorate: Aquaculture and Inland Fisheries on a six-month basis. Soft copies to be submitted via e-mail to: latoya.shivute@mfmr.gov.na and heidi.skrypzeck@mfmr.gov.na

Yours sincerely,


Annely Haiphene
EXECUTIVE DIRECTOR

