



Submitted to: Paratus Telecommunications (Pty) Ltd
Attention: Mr. Edward Esterhuyse
Private Bag 90140
Klein Windhoek
Namibia.

### **I&AP PUBLIC CONSULTATION DOCUMENT:**

THE PROPOSED BASE TRANSCEIVER STATION (BTS)
TOWER AND ASSOCIATED INFRASTRUCTURE FOR
PARATUS TELECOMMUNICATIONS (PTY) LTD ON ERF
398, OUTJO EAST, KUNENE REGION, NAMIBIA

PROJECT NUMBER: ECC-45-569-REP-08-D

REPORT VERSION: REV 01

DATE: 21 FEBRUARY 2025





Paratus Telecommunications (Pty) Ltd

### **TITLE AND APPROVAL PAGE**

Project Name: The proposed base transceiver station (BTS) tower and

associated infrastructure for Paratus Telecommunications (Pty)

Ltd on Erf 398, Outjo East, Kunene Region, Namibia

Client Company Name: Paratus Telecommunications (Pty) Ltd

Client Representatives: Mr. Edward Esterhuyse

Ministry Reference: APP-005015

Status of Report: Final for Government Submission

Project Number: ECC-45-569-REP-08-D

Date of issue: 21 February 2025
Review Period Record of Decision

#### **ENVIRONMENTAL COMPLIANCE CONSULTANCY CONTACT DETAILS:**

We welcome any enquiries regarding this document and its content. Please contact:



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#### **DISCLAIMER**

The report has been prepared by Environmental Compliance Consultancy Pty Ltd (ECC) (Reg. No. 2022/0593) on behalf of the Proponent. Authored by ECC employees with no material interest in the report's outcome, ECC maintains independence from the Proponent and has no financial interest in the Project apart from fair remuneration for professional fees. Payment of fees is not contingent on the report's results or any government decision. ECC members or employees are not, and do not intend to be, employed by the Proponent, nor do they hold any shareholding in the Project. Personal views expressed by the writer may not reflect ECC or its client's views. The environmental report's information is based on the best available data and professional judgment at the time of writing. However, please note that environmental conditions can change rapidly, and the information's accuracy, completeness, or currency cannot be guaranteed.



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### **ABBREVIATIONS**

Abbreviation	Description
BTS	base transceiver station
EAP	environmental assessment practitioner
ECC	Environmental Compliance Consultancy (Pty) Ltd
EMA	Environmental Management Act No.7 of 2007
ESIA	environmental and social impact assessment
I&APs	interested and affected parties
Ltd.	limited
m <sup>2</sup>	square metre
MEFT	Ministry of Environment, Forestry and Tourism
MICT	Ministry of Information, Communication and Technology
Paratus	Paratus Telecommunications (Pty) Ltd
Pty	proprietary
RoD	record of decision



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### 1 PUBLIC ENGAGEMENT AND COMMENTS FROM I&APS

#### 1.1 Introduction

Environmental Compliance Consultancy (Pty) Ltd (ECC) has been engaged by Paratus Telecommunications (Pty) Ltd (hereto referred to as Paratus or the Proponent) to conduct an environmental and social impact assessment (ESIA) in accordance with the Environmental Management Act, No. 7 of 2007 and its Regulations of 2012, for which an application for an environmental clearance certificate has been submitted for the proposed construction and operation of the base transceiver station (BTS) tower and associated infrastructure on Erf 398, Outjo East, Kunene Region, Namibia.

This document outlines the outcomes of the public engagement phase and provides records of engagements held with identified key stakeholders and interested and affected parties (I&APs). This report also provides a summary of the comments raised during the public engagement phase and the environmental assessment practitioner's (EAP) responses. This report will be submitted to the competent authority (i.e. Ministry of Information, Communication and Technology (MICT) and the Ministry of Environment, Forestry and Tourism (MEFT)) as an appendix to the Project's environmental scoping with impact assessment report for their review towards issuing a record of decision on the Project.

### 1.2 Public consultation

Public consultation is a compulsory and critical element of the ESIA process as it provides a platform to engage the I&APs and enhance the scope of the impact assessment. In accordance with section 21 of the Environmental Management Act No.7 of 2007 (EMA), the stakeholders and I&APs were engaged through various channels, which are outlined in the following sections.

#### 1.2.1 NEWSPAPER ADVERTISEMENTS

Public consultation and I&APs registration for the Project commenced on 17 December 2024 upon publication of the first newspaper advert. The second newspaper advert was published on 23 December 2024. These advertisements were placed across three national newspapers (The Republikein, Namibian Sun and Allgemeine Zeitung). The purpose of these advertisements were to initiate the public engagement process by informing the public and I&APs to register with the Project and an invitation to the public meeting. The records of the newspaper advertisements are provided in Appendix A.

#### 1.2.2 SITE NOTICE

In addition to the newspaper advertisements, a site notice was erected on site to inform the public about the Project (Appendix B).



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#### 1.2.3 PUBLIC MEETING

The identified stakeholders were engaged through formal letters and were invited to attend the public meeting (see the stakeholder letter provided in Appendix C). The public meeting was scheduled for 14 January 2025 at the Outjo Community Hall. However, despite the EAP's effort in organising to engage the public members, no public member attended, despite having been properly invited. This lack of participation was noted, and as result, alternative engagement methods were considered. Subsequently, the EAP practitioner (Mr Samuel Shinyemba) conducted door-to- door engagements with the residents in the vicinity of Erf 398 (identified as the directly affected parties). The (MICT) has formally requested, in its capacity as the competent authority, to be provided with the full ESIA report, along with all appendices, for their review and consideration. The letter received from the MICT is provided Appendix C and the list of the residents who were engaged are provided in Appendix D.

#### 1.3 KEY FEEDBACK ON ISSUES OF CONCERN – RESIDENTS ENGAGEMENT

The comments and concerns received from the residents who were engaged presented useful and valuable input in setting out the scope of the environmental and social impact assessment process. From an overall review of the recorded statements, the key common themes of concern that were raised can be summarised in the following categories:

#### 1.3.1 EMPLOYMENT OF RESIDENTS

Majority of the residents raised concerns whether the Proponent would consider employing some of the unemployed locals. The EAP clarified that it is unlikely that such opportunities will be available as the scope of work requires specialised skills. Contractors and subcontractors will be hired for these activities and will likely have their own employees. This may also include employees that will be required for unskilled or semi-skilled tasks, such as concrete mixing.

### 1.3.2 RISK OF PUBLIC EXPOSURE TO NON-IONISING RADIATION

The residents raised questions on the potential risk of the public being exposed to radiation emitted by the telecommunication tower. The EAP addressed these concerns by assuring the residents that this aspect will be thoroughly evaluated. The evaluation will include an assessment of buffer zones, which specify the minimum distance that telecommunication towers must be located from public areas to minimise the potential risk of radiation exposure.

#### 1.3.3 LOSS OF RECREATIONAL SPACE (FOOTBALL FIELD)

The residents highlighted that a portion of the Project site has been transformed into a football field and that public access to the sport field will be limited as the Project progresses. In response, the EAP clarified that the Project footprint is relatively small (approximately 100 m<sup>2</sup>) and therefore, a significant portion of the Erf, which overall is approximately 9 140 m<sup>2</sup>, is expected to remain



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undisturbed. Additionally, this social impact will be thoroughly evaluated in the impact assessment.

#### 1.3.4 PUBLIC REVIEW PERIOD

The draft scoping with impact assessment was issued to all registered I&APs for their review and commentary from 12 February 2025 to 19 February 2025 (seven days review period). No comments were received from the I&APs.



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### 2 DETAILED COMMENTS AND RESPONSES

ECC acknowledges that constructive feedback from I&APs contribute to a more comprehensive ESIA. The consultation process ensures that the Project is better understood by I&APs. Additionally, I&AP feedback enhances the scope of the assessment, as it may highlight impacts that were not fully considered or included during the screening phase.

The I&APs comments are summarised in Table 1.



Table 1 - Response to comments raised during the door-to-door engagements with the Outjo residents

Question/Comment	Response/Clarification
Paratus must consider market pricing	EAP: Comment noted, thank you.
because the target market may lack the	
financial means to afford higher service	The Proponent will strategically balance setting
prices.	affordable pricing that aligns with the financial realities
	of its target market, while ensuring the company can
	recover costs and maintain profitability.
When will the Project commence?	<b>EAP</b> : The commencement of the Project depends on
	several factors. The Project activities are listed under
	the Environmental Management Act No. 7 of 2007,
	which should not be undertaken without an
	environmental clearance certificate. The approval of the
	environmental clearance certificate application, which is
	underway, may take anywhere from a few months to
	several months. Once the reports are submitted, the
	Ministry of Environment, Forestry, and Tourism (MEFT)
	takes approximately three to six months to issue a
	record of decision (RoD) for projects similar to this.
A portion of the Project site has been	<b>EAP</b> : The Project footprint is relatively small, covering
transformed into a small football field.	approximately 100 m <sup>2</sup> , compared to the total size of the
Will our children be restricted from	Erf that is approximately 9 140 m <sup>2</sup> . The site may be
accessing this field?	inaccessible at some stage as the Project develops.
	This impact will be evaluated, and other alternative sites
	will also be considered.
	Paratus must consider market pricing because the target market may lack the financial means to afford higher service prices.  When will the Project commence?  A portion of the Project site has been transformed into a small football field.  Will our children be restricted from



Stakeholder Details	Question/Comment	Response/Clarification
	We have no objection to the Project.	<b>EAP</b> : Comment noted, thank you.
	Competition among service providers is	
	beneficial will result in improved service	Competition among network operators is expected.
	delivery.	This impact will be assessed during the impact
		assessment phase.
	The impact assessment must also assess	<b>EAP</b> : Comment noted, thank you.
	the potential risk of public exposure to	
	radiation emitted by the	This impact will be evaluated. The evaluation will
	telecommunication tower.	consider the required minimum distances that
		telecommunication towers must be located away from
		public areas or homesteads to minimise the potential
		risk of radiation exposure.
Lesly Narebeb	When will Paratus open a branch in Outjo?	<b>EAP</b> : As part of its corporate economic objective,
		Paratus aims to expand its services and operations
Blue-Sky Training Academy		across all regions within Namibia. As the Project
		progresses, a branch will be opened in Outjo.
	Will this be a 5G telecommunication	<b>EAP</b> : No. Although 5G technology is the next step in the
	tower?	evolution of telecommunication, this tower will focus on
		4G services, which remain a widely used and effective
		solution for meeting current communication needs.
	What is the height of the	<b>EAP</b> : The telecommunication tower will be 30 m.
	telecommunication tower?	
Julin Nuumba	We have no objections to the Project.	Noted, thank you.
	When will the Project commence?	



Stakeholder Details	Question/Comment	Response/Clarification
Etoshapoort Erf 428		<b>EAP</b> : The commencement of the Project depends on several factors. The Project activities are listed under the Environmental Management Act No. 7 of 2007, which should not be undertaken without an environmental clearance certificate. The approval of the environmental clearance certificate application may take anywhere from a few months to several months. Typically, the Ministry of Environment, Forestry, and Tourism (MEFT) takes approximately three to six months to issue a record of decision (RoD) for projects similar to this.
Petrus Uiseb Etoshapoort Erf 430	What will be the reception buffer zone of the telecommunication tower?	<b>EAP</b> : The reception buffer zone for the telecommunication tower will be approximately 4 km, although signal reception can also be acquired at distances up to 10 km, depending on factors such as terrain and environmental conditions.
	Will the Proponent employ some people from the local area?	<b>EAP</b> : The scope of work requires specialised skill sets that may not be readily available locally. Contractor companies will be hired during the construction phase, and they will have their own employees to carry out the necessary tasks.
	Is there a guarantee that network interruptions will not occur during bad weather?	<b>EAP</b> : Efforts will be made to ensure reliable network services. There is no absolute guarantee that there will be no network interruptions during bad weather (e.g. during times of heavy rain or high winds which impact



Stakeholder Details	Question/Comment	Response/Clarification
		signal strength or cause temporary outages). However,
		backup systems will be in place and efforts will be made
		to quickly restore services in the event of disruptions.



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### APPENDIX A - NEWSPAPER ADVERTS

**Tuesday 17 December 2024** 





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### Monday 23 December 2024











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### **APPENDIX B - SITE NOTICE**

Site notice: Erf 398, Outjo East Coordinates: -20.116268. 16.166412





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### APPENDIX C - STAKEHOLDER LETTER

Environmental Compiliance Consultancy (Pty) Ltd PO 8bx 91193 Wein Windhoek Namibia Info@eccenvironmental.com www.eccenvironmental.com +264 81 669 7608



ECC-43-542-LET-04-A

10 january 2025

#### IDENTIFIED STAKEHOLDER AND POTENTIALLY INTERESTED AND AFFECTED PARTY:

NOTICE OF AN ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND PUBLIC MEETING FOR THE PROPOSED CONSTRUCTION AND OPERATION OF A BASE TRANSCEIVER STATION (BTS) TOWER AND ASSOCIATED INPRASTRUCUTRE FOR PARATUS TELECOMMUNICATIONS (PTY) LTD ON ERF 597, DUTIO EAST, KUNENE REGION, NAMIBIA

Dear Mr Sir/ Madam

Environmental Compilance Consultancy (Pty) Ltd (ECC) has been engaged by Parabus Telecommunications (Pty) Ltd as the independent environmental assessment practitioner (EAP) to conduct an environmental and social impact assessment (ESIA) for the proposed construction and operation of a BTS telecommunication tower on Erf 397. Outjo East, Kunene Region. The application for an environmental clearance certificate and the assessment process is undertaken in terms of the Environmental Management Act No. 7 of 2007 and its 2012. Regulations.

This letter intends to engage potentially interested and affected parties (I&APs) for the Project and provide a platform and means of communication with ECC. You have been identified as a potential interested or affected party and therefore ECC wishes to engage with you throughout the ongoing ESIA process.

The background information document (BID) can be downloaded from our website via the following link: https://eccenvironmental.com/download/the-proposed-construction-and-operation-of-a-base-transceiverstation-bis-tower-and-associated-infrastructure-for-paratus-telecommunications-pty-ltd-on-enf-397-outjoeast-kunene-region-namibia/

As part of the ongoing assessment process, ECC is pleased to extend a formal invitation for you to attend the upcoming public meeting. The public meeting is scheduled as follows:

Date: 14 January 2025 Venue: Outjo Community Hall

Time: 18:00

To register as an I&APs, please complete the registration form available on the ECC website through the link provided above. Alternatively, you can register by emailing us at info@eccenvironmental.com or by phoning our office at +264.81 669 7608.

Registered i&APs will be notified of the availability of the draft scoping and impact assessment report, as well as the environmental management plan (EMP) for review before the reports are submitted to the competent authority and the Ministry of Environment. Forestry and Tourism (MEFT) for a record of decision.

Should you have any questions please do not hesitate to contact us and we will gladly assist.

Environmental Compilance Consultancy (Physical Lifegistration Number: 2022/0593)



Paratus Telecommunications (Pty) Ltd

Environmental Compliance Consultancy (Pty) Ltd

PO Box 91193 Klein Windhoek Namibia info@eccenvironmental.com www.eccenvironmental.com +264 B1 665 7608



Yours sincerely,

Stephan Bezuidenhout

stephan@eccenvironmental.com

Jessica Bezuidenhout Mooney jessica@eccenvironmental.com

Environmental Compilance Consultancy (Pty) Ltd | Registration Number: 3027/05/03

2



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#### Letter received from the Executive Director's office - MICT



#### MINISTRY OF INFORMATION AND COMMUNICATION TECHNOLOGY

Private Bay 13344 WINDHOER NAMIRIA OFFICE OF THE EXECUTIVE DIRECTOR

Tot: (+264-61) 283 2386/7 Fax: (+264-61) 251297 Ernell: ED-Office@mict.gov/as

net arraya

fric Mr. Berjonen Amoono/ Berjonen, Amoono@mictgoviso

16 January 2024

Mr. Stephan Bezuldenhaut, Principal Environmental Practitioner, Environmental Compliance Consultancy (Pty) Ltd., PO Bax 91193, KLEIN WINDHOEK.

Dear Mr. Bezuidenhout,

ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED CONSTRUCTIONS AND OPERATION OF A BASE TRANSCEIVERS STATION TOWERS AND ASSOCIATED INFRASTRUCTURE AT OUTJO EAST, KUNENE REGION

Reference is made to your letter dated 24 November 2024 regarding the above-mentioned subject matter.

The Ministry of Information and Communication Technology hereby advises your institution to submit the following documents to our office for review prior to submitssion to the Environmental Commissioner, Tris is to ensure compliance with the Environmental Act, 2007 [Act No. 7 of 2007] and its regulations.

- Scoping Reports.
- · Meeting minutes with the affected parties.
- Signed altendance register from the public consultations.
- Environment Management Plans (EMP) for proposed projects.

The Ministry would equally appreciate if the schedules of consultative meetings can be shared for ease of planning our attendance.

Sincerely,

Andrin Mathe

All official correspondence must be addressed to the Executive District.

WAMIBIA

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### APPENDIX D - A LIST OF RESIDENTS WHO WERE ENGAGED





Meeting Attendance Register

Date: 14 January 2025

Meeting Subject: A base transceiver station (BTS) tower and associated infrastructure, Erf 397, Outjo East, Kunorio Region

Proponent: Paratus Telecommunications (Pty) Ltd.

Venue: Outjo Community Hall

	NAME	ORGANISATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
i	Fonley-Numps	BLANDER SES		08/2252961	2005
	Jeffray Tulon	Saamasta		0817440301	U+\$940.
	Jachn Gerin			08/21602857	All) 2.
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	NAME	ORGANISATION	EMAIL ADDRESS	CONTACT NUMBER	SIGNATURE
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