



Date: 09 April 2025

The Office of the Environmental Commissioner
Department of Environmental Affairs and Forestry
Ministry of Environment, Forestry and Tourism
Private Bag 13306 Windhoek, Namibia

Attention: Mr. T. Mufeti

Dear Sir

Re: Response from the National Radiation Protection Authority (NRPA) / (Atomic Energy & Radiation Protection Authority (AERPA)) – The Proposed Construction and Operation of New Telecommunication Guyed Mast Towers for APP-005631 (Ehomba Site), APP-005632 (Ongongo Site), APP-005633 (Epinga Site), 005634 Site (Shanyashi Site) and APP-005635 (KadumbuPS) in the Kunene Region, Ohangwena, Kavango East and Kavango West, respectively

Mobile Telecommunications Limited (MTC Namibia or the Proponent) proposes to construct and operate these five 60m high guyed mast telecommunication towers in the Kunene Region (Ehomba & Ongongo sites), Ohangwena (Epinga site), Kavango East (Shanyashi site), and Kavango West (KadumbuPS site), respectively. The proposed towers are planned for a 9m x 9m project site (footprint) in their respective regions. The EIA Studies were conducted, completed, and the respective Scoping Report as well as EMPs compiled.

As requested on the ECC Portal (upon screening of the ECC applications of the 5 sites), consent from the NRPA/Atomic Energy & Radiation Protection Authority (AERPA) was requested. Serja HGE Consultants consulted the AERPA and shared the EIA Scoping Reports and EMPs on 08 April 2025 – see email communication ([Annexure A](#)). The AERPA responded to the consent request with the attached letter – [Annexure B](#) for your attention.

Should you or your office require further information, please do not hesitate to contact us.

Yours sincerely,

.....

Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Serja Hydrogeo-Environmental Consultants CC

Mobile No: +264 (0) 81 407 5536 / +264 81 749 9223

ANNEXURE A – EMAIL COMMUNICATION TO THE NRPA/AERPA ON 08 APRIL 2025

From: Fredrika Shagama - Serja HGE Consultants <fredrika@serjaconsultants.com>

Sent: 08 April 2025 13:00

To: Amakali Gideon

Cc: Joseph Eiman; Dauphin Matomola; Yamilla Kuruses

Subject: Request/Application for AERPA Approvals or Consent for MTC Namibia five (5) 60m high Guyed Mast Towers in the Kunene, Ohangwena, Kavango East & West Regions - Environmental Impact Assessment (EIA) Studies

Dear Dr. Amakali

Serja HGE Consultants has been appointed by MTC Namibia to undertake 9 EIA Studies for the proposed new guyed mast telecommunication towers in 5 regions. However, upon screening of the environmental clearance applications by the Ministry of Environment, Forestry & Tourism (MEFT), 5 of the 9 sites need approval is from the Atomic Energy & Radiation Protection Authority to aid in the evaluation of the EIA Report at the Ministry of Environment, Forestry & Tourism in consideration of the environmental clearance for the towers before they are constructed.

It is against this background that we are hereby sharing the Final EIA/Scoping Assessment Reports and Environmental Management Plan (EMPs) for the proposed network towers for your evaluation and consideration of the consents (these are required for the submission of the EIA Reports). Due to a possible limit on file size on your side (21MB file size), the 5 merged EIA Reports with their EMPs can be downloaded from the WeTransfer link here <https://we.tl/t-cfWHSTBKBA> – **kindly download the files within 3 days as the link expires then.**

Kind regards,

Fredrika Shagama: Environmental Assessment Practitioner
Mobile No. +264 81 407 5536

ANNEXURE B – RESPONSE TO CONSENT REQUEST FROM THE NRPA/AERPA ON 09 APRIL 2025

Re: Request/Application for AERPA Approvals or Consent for MTC Namibia five (5) 60m high Guyed Mast Towers i...



Amakali Gideon <Amakali.Gideon@mhss.gov.na>

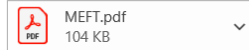
To: Fredrika Shagama - Serja HGE Consultants

Cc: Joseph Eiman; Dauphin Matomola; Yamilla Kuruses

[Reply](#) [Reply All](#) [Forward](#) [...](#)

Wed 09/04/2025 9:34 am

You replied to this message on 09/04/2025 11:09 am.
If there are problems with how this message is displayed, click here to view it in a web browser.



Dear Fredrika

This is to acknowledge receipt of your submission. Kindly find attached, for your information.

Best regards

Gideon Amakali (PhD)
Chief Radiation Physicist
Atomic Energy & Radiation Protection Authority
Ministry of Health and Social Services,
-1C,02, Basement
Ministerial Building
C/o Florence Nightingale & Harvey Streets
Windhoek, NAMIBIA
[Tel:+264 61 203 4124](tel:+264612034124)
[Fax:+264 61 203 4124](tel:+264612034124)
Amakali Gideon



Tel: +264 61 203 4124
Office: Cnr. Florence Nightingale
& Harvey Streets, Ministerial
Building



**NATIONAL RADIATION
PROTECTION AUTHORITY**
*Established pursuant to Section 33 (1) of the Atomic Energy &
Radiation Protection Act, Act No 5 of 2005*

Ministry of Health and
Social Services
P/BAG 13198
Ministerial Building
Harvey Street
Windhoek 9000
Namibia
Tel: +264 (61) 2032417
Fax: + 264 (61) 230424
E-mail: aerpr@mhss.gov.na
Website: aebofnamibia.org

Enquiries: Dr. G Amakali

Ref: 19/2/2/2

Date: 25 February 2025

Mr Timoteus Mufeti
Environmental Commissioner
Ministry of Environment, Forestry and Tourism

Dear Mr Mufeti

Subject: Proponents Non-Adherence or Non-Compliance with Non-Ionising Radiation Protection Regulations: Atomic Energy and Radiation Protection Act, 2005.

The National Radiation Protection Authority (NRPA) is a statutory body established in terms of Section 33 of the Atomic Energy and Radiation Protection Act, Act No 5 of 2005. The mandate of the NRPA is to provide for adequate protection of the environment and of people in current and future generations against the harmful effects of radiation including controlling and regulating **non-ionising radiation** sources such as mobile communication network towers and related infrastructure.

In an attempt to bring the operators of mobile communication towers under regulatory control or oversight, we held numerous consultative meetings and engagements with mobile communication service providers sensitizing them on the regulatory requirements as outlined in the Non-Ionising Radiation Regulations: Atomic Energy and Radiation Protection Act, 2005.

We have noted with concern that Mobile Telecommunications Limited (MTC) and Paratus Telecommunications (Pty) Ltd have disregarded our advice and recommendations. MTC has clearly communicated that they do not believe they fall within our regulatory process and rather advised Government to reform. Further, we experience that some proponents only approach our office in case they encounter challenges such as community opposition and resistance. Our recommendations to the mobile communication service providers have been in line with the regulatory provisions as outlined in clauses 4, 5 and 9 of the afore-mentioned regulations.

These Recommendations include that:

- i. Mathematical calculation or appropriate modelling tool be used to establish boundaries (exclusion zone) for every antenna mounted on the base station, outside

Mission

To provide for the adequate protection of the environment and of people in current future generations against the harmful effects of radiation

of which electric and magnetic field (EMF) exposure is below the International Commission on Non-Ionizing Radiation (ICNIRP) limits. This information should be provided to the Authority as soon as practical.

- ii. Reasonable and practicable engineering or administrative control measures are implemented for established boundaries to regulate access by members of the public and workers.
- iii. The site be registered as required by the Non-Ionising Radiation Regulations (Government Notice No 126 of 2020).

In light of the above, the NRPA will no longer review or approve installations by MTC and Paratus, until such time that they demonstrate readiness to comply with the regulatory requirements.

I trust the above is in order.

Yours Sincerely,

Axel Tibinyane

Director

