



Date: 16 April 2026

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 regarding the Consent from the Directorate of Wildlife & National Parks on the EIA Scoping Report and Environmental Management Plan (EMP) for the proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia – Application for ECC (ECC Application No. APP-006781)

As appointed by Telfs Investments (Pty) Ltd (the Proponent) to conduct the EIA Study process and apply for an ECC on their behalf, Serja Hydrogeo-Environmental Consultants cc (*Serja HGE Consultants*) commenced the EIA process on the 05th of November 2025 with formal written notices to key stakeholders, including the project site/land custodian (Directorate of Wildlife & National Parks) on the 9th of December 2025 (**Annexure 1**). The submitted written notice (letter) to the DWNP was accompanied by the project Background Information Document (BID). Following the initial communication on the 9th of December 2025, the draft EIA Scoping (with the EMP and associated appendices) was submitted to the DWNP for review and consideration of the consent letter (see **Annexure 2**). A response to the consent request (**Annexure 3**) was provided to Serja HGE Consultants and collected on the 9th of March 2026. However, the DWNP cannot issue consent to the proposed salt production on the 10 mining claims (MC-75982-75991), due to the *special value zone of the Cape Cross Nature Reserve as fully detailed in Annexure 3*. We acknowledge the concern from the DWNP; however, based on our site observations, the lichens are not on the salt pans (also as per section 5.1.2.1: floral habitats, page 28 and Figure 5-5, page 29 of the Scoping Report). Similarly, Damara Terns (*Sterna balaenarum*) seem to breed mainly on gravel plains near the seal colony. Therefore, the proposed salt mining activities on the salt pan will not have a significant impact on these two components. It should also be noted that the only activities that will be conducted on the mining claims are limited to salt excavation and not processing (section 2.3, page 6 of the Scoping Report).

Furthermore, the archaeological and cultural heritage impact has been assessed by an experienced Archaeologist and the two Archaeological and Heritage Impact Assessment (AHIA) Reports (Appendix I of the Scoping Report). The archaeological and heritage sensitivity of the site was also assessed as of low significance in the AHIA Reports as referenced under section 5.4.2.2 of the EIA Scoping Report (page 45). The two AHIA Reports have been submitted to the National Heritage Council (NHC) of Namibia for evaluation and decision-making on the Heritage Consent (decision pending with the NHC once the evaluation of the reports is completed).

It is therefore against this background that we request a reconsideration during evaluation for the ECC to be granted under these conditions to:

- Limited and specific activities that are deemed acceptable considering the low intensity and low frequency of work on the project mining claims' sites (refer to Scoping Report section 2.4 on page 9), and or
- Restrict salt excavation works to areas in the mining claims that leave a larger buffer area between the beach and the crystallisers. This has also been indicated and considered in the Scoping Report under Chapter 2 (page 6 after the map in Figure 2-1), which states that *"the natural brine ponds nearer the sea will not be affected because the Proponent will leave a buffer area between the crystallisers and the natural brine ponds."*

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

Yours sincerely,



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Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Serja Hydrogeo-Environmental Consultants CC

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Email: fredrika@serjaconsultants.com

Annexure 1: EIA notification letter (with the project BID) to the Directorate of Wildlife and National Parks (DWNP) on the 9th of December 2025

Date: 05 December 2025

Office of the Director
The Directorate of Wildlife and National Parks (DWNP)
Ministry of Environment, Forestry and Tourism
Private Bag 13306 Windhoek, Namibia



RECEIVED
2025 -12- 09
DWNP
By: Y. Nakatane

Attention: Mr. Bennett Kahuure

Dear Sir

Re: Notice of the Environmental Impact Assessment (EIA) Study for the proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia – Application for Environmental Clearance Certificate (ECC) to the Environmental Commissioner, ECC Application No. APP-006781

Serja Hydrogeo-Environmental Consultants (Serja HGE Consultants) have been appointed by Telfs Investments (Pty) Ltd (*the Proponent*) to conduct an Environmental Impact Assessment (EIA) Study for the proposed salt production within ten (10) mining claims (MC75982-75991) located south of Cape Cross, within the Cape Cross Seal Reserve (CCSR) in the Arandis Constituency, Erongo Region - please refer to the attached **Background Information Document (BID)**.

Please note that mining-related activities are listed in the 2012 Environmental Impact Assessment (EIA) Regulations of the Environmental Management Act (EMA) No. 7 of 2007 as an activity that cannot be implemented without an Environmental Clearance Certificate (ECC) issued by the Environmental Commissioner upon evaluation and approval of an Environmental Impact (EIA) Study. Should the ECC be issued by the Environmental Commissioner, the Proponent will then submit the ECC to the Ministry of Industries, Mines and Energy (MIME) for the finalisation of the mining claims' applications (for consideration of the approval of the mining claims rights/certificate). Once all the paperwork is in place (the ECC and mining claims certificate/rights), the Proponent will plan for and commence with the proposed salt production activities onsite (within the 10 mining claims).

To fulfil the requirements of the EMA and its EIA Regulations, Telfs Investments appointed Serja HGE Consultants to conduct the required EIA Study and apply for the ECC on their behalf. The Study entails Public & Stakeholders' Consultation – sharing information and recording of issues/concerns and comments (potential impacts) to be incorporated, assessed in the EIA Scoping Report, with management and mitigation measures provided in the Environmental Management Plan (EMP). The two documents (EIA Scoping Report and EMP) with associated appendices will be submitted to the Office of the Environmental Commissioner for consideration of the ECC for the mining claims.

Furthermore, as required by the Department of Environmental Affairs & Forestry (DEAF), a written notice to your office is required, followed by a consent letter from the DWNP, as the project will be operated in CCSR. Consequently, Serja HGE Consultants hereby submits the BID and the EIA Scoping Report, and the Environmental Management Plan (EMP) will be forwarded to your office for the consent letter towards the mining claims and planned activities.

Should you or the Directorate of Wildlife & National Parks have any comments, issues, or concerns that you would like us to consider in the EIA Scoping Report and EMP, please send these to us **in writing before or on Friday, 16 January 2026.**

Yours sincerely,



Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Serja Hydrogeo-Environmental Consultants CC

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Please refer to the site maps (locality and the site's location in the Arandis Constituency and in the Cape Cross Seal Reserve) and the Background Information Document (BID) on the next pages.

Annexure 2: Submission of the EIA Scoping (with the EMP and associated appendices) to the Directorate of Wildlife and National Parks (DWNP) for a Consent Letter Request on the 9th of March 2026

RECEIVED

2026-03-09

DWNP

Date: 09 March 2026

Office of the Director

The Directorate of Wildlife and National Parks

Ministry of Environment, Forestry and Tourism

Private Bag 13306 Windhoek, Namibia



Attention: Mr. Bennett Kahuure

Dear Sir

Re: Request for a Consent Letter for the Proposed salt production within ten (10) Mining Claims (MCs) No. MC75982, 75983, 75984, 75985, 75986, 75987, 75988, 75989, 75990 & 75991 (MC75982-75991) located south of Cape Cross in the Erongo Region, Namibia – Submission of the EIA Scoping Report and Environmental Management Plan (EMP) to ECC Application No. 006781

Telfs Investments (Pty) Ltd (the Proponent) proposes salt production within ten (10) mining claims (MC75982-75991) located south of Cape Cross, within the Cape Cross Seal Reserve (CCSR) in the Arandis Constituency, Erongo Region. The proposed activity (mining-related activities) is listed in the 2012 Environmental Impact Assessment (EIA) Regulations of the Environmental Management Act (EMA) No. 7 of 2007 as an activity that cannot be implemented without an Environmental Clearance Certificate (ECC) issued by the Environmental Commissioner upon evaluation and approval of an Environmental Impact Assessment (EIA) Study.

Subsequently, to fulfill the EMA requirements, the Proponent appointed Serja Hydrogeo-Environmental Consultants CC (Serja HGE Consultants) to conduct an EIA Study in an application for the ECC. Upon registration of the project (ECC application) on the MEFT ECC Portal, the application screening and verification, **a consent letter from the Directorate of Wildlife and National Parks is required in addition to the EIA Scoping, EMP, and other documents, as the mining claims fall within the Cape Cross Seal Reserve.**

Furthermore, should the ECC be issued by the Environmental Commissioner, the Proponent will then submit the ECC to the Ministry of Industries, Mines and Energy (MIME) for the finalisation of the mining claims' applications (for consideration of the approval of the mining claims rights/certificate). Once all the paperwork is in place (the ECC and mining claims certificate/rights), the Proponent will plan for and commence with the proposed salt production activities onsite (within the 10 mining claims).

It is therefore against this background that Serja HGE Consultants hereby submits the EIA Scoping Report, EMP, and associated appendices for your evaluation and **consideration for the consent letter**, which is required on the ECC Portal for consideration of the mining claims' ECC.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fredrika Shagama', written over a horizontal dotted line.

Ms. Fredrika Shagama: Principal Environmental Assessment Practitioner & Hydrogeologist

Serja Hydrogeo-Environmental Consultants CC

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

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Annexure 3: Directorate of Wildlife and National Parks (DWNP) response to the consent request (collected on the 9th of March 2026 by Serja HGE Consultants)



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT, FORESTRY AND TOURISM

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24 March 2026

Ms. Fredrika N. Shagama

Serja Hydrogeo-Environmental Consultants CC

PO Box 27318

Windhoek

Dear Ms. Shagama,

Response by Directorate of Wildlife and National Parks, Ministry of Environment, Forestry and Tourism, on the scoping report for the proposed salt production within 10 Mining Claims MC75982 – 75991 located south of Cape Cross in the Erongo Region, Application Number 006781

The Directorate of Wildlife and National Parks has reviewed the scoping report for the proposed salt production within the ten above-mentioned Mining Claims.

The ten claims fall within the “Special Value” Zone of Cape Cross Nature Reserve. This zone is high in archaeological, geological, paleontological and historical sites; hosts important breeding colonies of the near endemic Damara Tern and serves as an important seabird area for feeding and roosting; as well as hosts unique lichen fields which are highly vulnerable to physical disturbance.

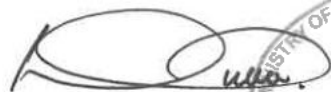
“Stop the poaching of our rhinos”

All official correspondence must be addressed to the Executive Director



No new Mining Claims are allowed in Protected Areas, and I therefore regret to inform you that the Directorate of Wildlife and National Parks cannot support the approval of Mining Claims MC75982 – 75991.

Yours sincerely,



Bennett Kahuure
Director

