



NEWS
NAMIBIAN
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SOCIETY

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Statement by NEWS on ENVIRONMENTAL CLEARANCE FOR MARINE PHOSPHATE MINING

The Namibian Environment and Wildlife Society (NEWS) endorses sustainable development and the wise use of Namibia's natural resources in a healthy environment. With any new developments that may carry a risk of environmental damage, including mining, it is our task as Namibians (and global citizens) to ensure that such damage is prevented. This is even more important when such a development could threaten other key sectors of our economy that rely on our natural resources.

NEWS has followed the progress of the Namibia Marine Phosphates mining application since the initial EIA in 2011. It is important to note that the EIA was split into two components, marine and terrestrial. The Environmental Clearance announced by MET on 19 September is only for the sea-floor mining at Mining Licence Area 170. The assessment of the whole project is still incomplete.

The marine component of the project was initially assessed in 2011, and then subjected to a 'verification study' by a team of independent marine experts. The study took place during the moratorium on marine phosphates that was laid down by Government. That moratorium expired in 2015, and the outcome of the verification study and other reviews of the EIA have informed the MET's decision. Will this decision be good for Namibia and our sustainable development, and not compromise the health of our marine environment?

- It is heartening that, according to the team of marine experts, phosphate mining at MLA 170 is unlikely to compromise Namibia's fishery sector. In principle, NEWS therefore supports the Environmental Clearance.
- It is equally encouraging that the conditions in the Environmental Clearance certificate include a monitoring programme in order to detect any environmental impacts that could not be predicted or that exceed acceptable thresholds. We urge that this monitoring programme is set up and conducted in a rigorous, meaningful manner by independent experts without bias to the mining company, and that the conditions pertaining to revoking the Environmental Clearance are indeed enforced if negative impacts are detected.
- We support the suggestion of the establishment of a "centre of excellence" to carry out further marine research as long as its competence, independence and impartiality can be guaranteed.
- NEWS is concerned that the EIA process for mining at MLA170 did not include the planned land-based phosphate-processing operation, although this is an integral part of the mining process. Although the necessity for obtaining a second clearance was stipulated in the Environmental

Clearance conditions, the question arises whether the approval to mine phosphates will pave the way for Environmental Clearance for the land-based operations.

- It is also disconcerting to NEWS that the public participation process during the EIA was not followed satisfactorily. Regulation 23 (1) of the Environmental Management Act 7 of 2007 states that *“a registered or affected party is entitled to comment in writing, on all written submissions made to the Environmental Commissioner by the applicant responsible for the application...”*. However, registered Interested and Affected Parties were not informed of the revised EIA/EMP drafts that were submitted to and approved by the Environmental Commissioner, and were not given a chance to peruse and comment on the documents. NEWS therefore urges full transparency in the continuation of the EIA process for the land-based part of this project, so that interested and concerned members of the public can inform themselves on this proposal.
- This approval is likely to be followed by more applications to mine marine phosphate. It is thus imperative that the extent and nature of the cumulative impacts that seabed mining, together with other marine activities, have on our marine and coastal environment are taken into account through careful and informed marine spatial planning.

We recognise that Namibia is in a difficult position, being the first in the world to test marine phosphate mining. As long as our decisions are based on good science, take cumulative effects into account, make provision for mitigating negative impacts and can be discussed openly without any secrecy, we are confident that we are still on ‘safe ground’. We trust that our leaders will have the integrity to make other difficult decisions if evidence of significant environmental harm emerges in the rest of the EIA for this project, and any time in future.