

Summary of events and activities by the SAUMC/SAUMA relating to exploration activities for uranium in the Stampriet Artesian Basin

Introduction

The Stampriet Transboundary Aquifer System (STAS) or Stampriet Artesian Basin (SAB) or Stampriet Subterranean Water Control Area, extends from central Namibia into western Botswana and South Africa's Northern Cape Province. The area is 87,000 square kilometres (km²) in size. The STAS is the only permanent, and dependable water resource for the local population living in this area (UNESCO, 2016).

The Minister may by notice in the Gazette declare an area defined in the notice as a subterranean Government water control area if he is of the opinion that it is desirable in the public interest that the abstraction, use, supply or distribution of subterranean water in the area be controlled, and may from time to time in like manner withdraw or amend such notice (Water Act 54 of 1956, Section 28; (S. 28 amended by S. 5 of Act No. 42 of 1975 and by SS. 46 and 47 of Act No. 97 of 1986 and substituted by S. 17 (1) of Act No. 68 of 1987).

"Subterranean water" means water naturally occurring underground or obtained from underground in an area declared in terms of section 28 as a subterranean Government water control area or deemed to have been so declared (S. 27 substituted by S. 17 (1) of Act No. 68 of 1987).

The Namibian part of the STAS-area covers approximately two-thirds of the area (mainly agricultural land - stock, wildlife and irrigation farms); the Botswana sector occupies 19% of the area (with three distinct land use zones: agricultural land, a wildlife management area, and a national park); and the South African sector (8%) that is entirely used as a national park (UNESCO, 2016).

Based on the latest edition of the Atlas of Namibia, the population in the area is estimated to be around 80,000 (Atlas of Namibia Team, 2022), with more than 90% of the people being located in Namibia (UNESCO, 2016). The aquifer overlaps with two of the 14 regions of Namibia, i.e. the Omaheke and Hardap Regions, and that harbours populations of 74,629 and 87,186 respectively (Namibia Statistics Agency, 2017).

The **Stampriet Aquifer Uranium Mining Committee** (SAUMC), consisting of concerned farmers, staff of the Namibia Agricultural Union (NAU), experts on geology, geohydrology and the environment, was formed in October 2021. This has become the Management Committee of the **Stampriet Artesian Uranium Mining Association** (SAUMA) and is

directing the campaign against the possibility of the mining of uranium orebodies located in the top-quality drinking water aquifers of the Stampriet Artesian Basin.

In line with the Minerals (Prospecting and Mining) Act 33 of 1992, the commencement of the Environmental Management Act (EMA) 7 of 2007 (06 February 2012; Government Notice (GN) No. 28), the Listed Activities that may not be undertaken without an Environmental Clearance Certificate (ECC) (GN No. 29), and the Environmental Impact Assessment (EIA) Regulations (GN No. 30) (Government of the Republic of Namibia (GRN), 2012), Proponents need to apply to the Executive Director, Ministry of Mines and Energy (MME) (Competent Authority) and the Environmental Commissioner, Ministry of Environment, Forestry and Tourism (MEFT) for an ECC.

The Proponent, or the Environmental Assessment Practitioner (EAP) appointed by the Proponent, then needs to carry out an Environmental Scoping Study (including Public Consultation) and prepare an Environmental Management Plan (EMP).

The Environmental Commissioner, Ministry of Environment, Forestry and Tourism (MEFT) will then, either issue an ECC (that is valid for a period of three (3) years), or request that a detailed assessment (EIA) be carried out.

Exclusive Prospecting Licences (EPLs) are initially granted (by the MME) for a period of three (3) years and may be renewed; each renewal is valid for two (2) years, dependant on submission of prospecting results. An EPL may also be endorsed for an additional commodity.

Sequence of Events and Actions taken by the SAUMC/SAUMA

Begin-August 2021 Environmental Compliance Consultancy CC initiates a Public Consultation Process, as part of an Environmental Assessment Study for the **proposed Wings Project for Pilot In-Situ Leaching (ISL) (EPL 4655; Omaheke Region)**, in order to obtain an ECC (the Background Information Document (BID) is dated August 2021; the letter of notification is dated 23 August 2021).

27 September 2021 Two Public Meetings are held in Windhoek; while the pilot study involving ISL is mentioned, no specifics of the pilot study, or the baseline conditions, or any site-specific hydrogeology information are provided; during the second meeting, it was established that the Orange-Senqu River Commission (ORASECOM) had not been consulted.

28 September 2021 One Public Meeting is held in Leonardville, Omaheke Region (with the same shortcomings; see above).

End-September/October 2021 Issues and concerns (from registered Interested and/or Affected Parties (I&APs) from the SAUMC) are submitted to Environmental Compliance Consultancy CC with regards to the proposed Wings Project for Pilot ISL.

Mid-October 2021 The Stampriet Aquifer Uranium Mining Committee (SAUMC) is established and the first Committee Meeting takes place on 29 October 2021.

27 October 2021 Agri SA contacts the NAU to express concern on mining developments within the Aquifer. A reply from the Department of Water and Sanitation to Agri SA is dated 17 November 2021.

The following, as far as can be ascertained, took place with regards to **EPL 4655** before and after the initiation of the proposed Wings Project for Pilot ISL (see above):

2012 Dr Sindila Mwiya from Risk-Based Solutions (RBS) CC prepared a Scoping and Environmental Management Plan (EMP) Report.

09 October 2012 The Ministry of Environment and Tourism (MET) (now Ministry of Environment, Forestry and Tourism (MEFT)) issued an Environmental Clearance Certificate (ECC) - for exploration activities and possible test mining.

April 2018 The Scoping and EMP Report is updated (by RBS), based on the previous Scoping and EMP Report (2012), as well as the Environmental Monitoring activities that have been undertaken since 2012, in order to apply for the renewal of the ECC (issued on 09 October 2012).

03 September 2018 MET (MEFT) issued a second (renewal) ECC.

July 2021 Mr Stephan Bezuidenhout and Mrs Jessica (Bezuidenhout) Mooney from Environmental Compliance Consultancy CC prepared an *Environmental Compliance Report for Ongoing Exploration / Prospecting under the Exclusive Prospecting License (EPL) No. 4655 Gobabis/Mariental Districts, Omaheke/Hardap Regions* (see http://the-eis.com/elibrary/sites/default/files/downloads/literature/2876_ECR_EPL%204655%20in%20the%20Gobabis_Mariental%20Districts_Omaheke_Hardap%20Regions.pdf). The document has since been withdrawn by Environmental Compliance Consultancy CC (Mr Josafat Hiwana, Chief Conservation Scientist, Ministry of Environment Forestry and Tourism, pers. comm., 15 March 2022).

01 July 2022 MEFT issued a third (renewal) ECC for Exploration Activities on EPL 4655 (see Attachment 1).

The sequence of events for EPLs 4656 and 4657 is similar (it is uncertain as to whether the ECCs have been renewed for the two EPLs as well, or only for EPL4655).

05 November 2021 A letter *Critically Urgent: Prevention of in-situ leach mining of uranium in the drinking water of the Stampriet Artesian Basin (SAB)* is prepared by SAUMC and copies are hand-delivered to the Executive Directors, MEFT, MME, Ministry of Agriculture, Water and Land Reform (MAWLR) and Ministry of Health and Social Services (MoHSS), with copies to the Environmental and Mining Commissioners and the Chief Executive Officer, Namibia Water Corporation (see Attachment 2).

05 November 2021 The Executive Director, Ministry of Agriculture, Water and Land Reform (MAWLR) withdraws Drilling Permits No. 11561 and 11562 (due to gross violations and non-compliance of permit major conditions) (see Attachment 3).

08 November 2021 Legal advice is sought.

17 November 2021 The NAU paid a courtesy visit to the Ombudsman, Basilius Dyakuga, raising concerns on the protection of Namibia's environment. Following this visit, an urgent request in writing (25 November 2021) calls on the Ombudsman's Office to investigate the ISL activities within the SAB (see Attachment 4).

18 November 2021 Cancer Association of Namibia issues a letter of concern to the Press and the SAUMC.

22 November 2021 Personalised letters *Critically Urgent: Prevention of in-situ leach mining of uranium in the drinking water of the Stampriet Artesian Basin (SAB)* were prepared by SAUM Committee and hand-delivered to the Ministers, MEFT, MME, MAWLR, and MoHSS (see Attachment 5).

30 November 2021 Earthlife Namibia addresses an open letter to the ED, MAWLR.

January 2022 Meeting with the Botswana High Commissioner (and informing the Commissioner of this project).

18 January 2022 Meeting with the British High Commissioner (and informing the Commissioner of this project).

26 January 2022 Meeting with the Ambassador of the Republic of Germany (and addressing the situation of possible contamination of the SAB drinking water).

2021 – Ongoing:

Establishment of database of world experts on ISL and preparation of a draft Terms of Reference.

Regular planning meetings (29 October 2021; 18 November 2021; 20 January 2022; 10 February 2022; 24 March 2022; 15 June 2022; 14 July 2022; 26 July 2022; 22 August 2022; 16 and 22 September 2022); of the SAUMC/SAUMA and information dissemination among farmers.

Various radio interviews and press releases.

PowerPoint presentations by Dr Roy Miller on the dangers of acid ISL to the drinking-water aquifers of the SAB to: the NAU (29 October 2021 and 11 November 2021), Namibia Scientific Society (04 November 2021), Honourable Minister C. Schlettwein (October 2021), Stampriet Farmers Association (24 January 2022), Staff of Environmental Commissioner's Office (16 February 2022), Nauchas Farmers Association (12 March 2022), Aminuis Community in Omdersombapa (12 May 2022), The Geological Society Of Namibia (20 May 2022), Management of Agra at Agra Head Office (20 June 2022), Herero Businessmen in Windhoek (28 July 2022), Webinar on knowledge dissemination on in-situ leaching method, organised by Rosatom (11 August 2022), Public (Round Table) Talks organised by Rosatom in Windhoek (30 August 2022), Stampriet with LPM and Farmers (12 September 2022), and Future Waters Symposium at Aarhus University (online; 19 September 2022).

03 March 2022 Meeting with Mrs Jessica Bezuidenhout and Mr Matthew Bliss of Environmental Compliance Consultancy CC. They stated that they compiled a total of 61 pages of questions during the Public Stakeholder Meetings, which they were busy processing, and therefore no date could be provided as to when the EIA for the proposed Wings Project Pilot ISL will be finalised for issuance/I&AP Comments.

22 June 2022 The NAU followed-up on feedback from the Ombudsman's Office.

28 June 2022 The NAU received a hand delivered envelope containing a report dated 13 June 2022 and entitled *Progress of Our Investigation on the Allegations of Contamination of Underground Water in the Stampriet Transboundary Aquifer System* (22 pp.) (see Attachment 6). Several shortcomings were pointed out with regards to activities that took place; awaiting the final report from the Office of the Ombudsman.

07 July 2022 Reaching out to the BGR (Bundesanstalt für Geowissenschaften und Rohstoffe) – Mr Martin Quinger – re the project.

20 July 2022 SAUMC presented a letter to the Hon. Minister Schlettwein during a meeting scheduled for livestock matters (see Attachment 7).

11 August 2022 Members of SAUMC attend and participate in *Webinar on knowledge dissemination on in-situ leaching method*, organised by Rosatom.

24 August 2022 Leonardville Farmers Association discussed raising funds for legal support.

30 August 2022 Members of SAUMC attend and participate Public (Round Table) Talks held in Windhoek (organised by Rosatom).

01 September 2022 The exact locations of the water sampling sites as indicated during the presentation of Dr Boytsov (30 August 2022) is requested from Anton Korobkin, Head of Geological and Production Department. The report (dated 2022) *REPORT ON «ANALYSIS OF WATER SAMPLES FROM THE HORIZON AUOB3(UPPER SUBHORIZON), COMMUNAL AND COMMERCIAL FARMING BOREHOLES»* (66 pp.) is made available (by Anton Korobkin) on 5 September 2022.

08 September 2022 The *Regional scale numerical groundwater flow model of the Auob Aquifer, Aranos Basin* – Report (mentioned during the presentations held on 30 August 2022) is requested from Anton Korobkin, Head of Geological and Production Department. The report prepared by Namib Hydrosearch (dated October 2021; 39 pp). is made available on 22 September 2022.

08 September 2022 Meeting with Environmental Compliance Consultancy CC to again follow up on the (progress with regards to the) EIA for the proposed Wings Project Pilot ISL. They verbally informed the attendees at the meeting that they/Environmental Compliance Consultancy CC have provided Headspring Investments with a notice of cancellation of services on 1 September 2022. They verbally stated that Headspring Investments failed to provide required information to compile an EIA.

09 September 2022 A second letter is submitted to the Hon. Minister Schlettwein requesting a meeting to discuss the Stampriet Aquifer mining matter (see Attachment 8).

12 September 2022 Reaching out to the Environmental Lawyers Network on Namibia (ELNN) and initiating the opening of a bank account to assemble funds.

16 September 2022 Headspring Investments applies to the MAWLR for a permit to drill 250 additional wells to a depth of 400 m (B. Swartz, pers. comm.).

16 September 2022 Establishment of SAUMA (Stampriet Artesian Uranium Mining Association), an Association with its own Constitution.

23 September 2022 Statement provided by Dr Sarma, Namib Hydrosearch - Subject: Comments on the Powerpoint presentation by Dr A. Boytsov, Tenex, Rosatom, Russian Federation on the Wings Project and Final Regional Groundwater Report, Aranos Basin Model_Auob Aquifer (NHN234) (see Attachment 9).

30 September 2022 Meeting with Hon. Minister Schlettwein.

Moratorium / Central Uranium Rush / Strategic Environmental Assessment / Lifting of Moratorium

2007 At the time (by 2007), 36 exploration licences for nuclear fuels were granted in the central part of the Erongo Region. The renewed interest in uranium exploration was triggered by concerns about the security of global uranium supplies (i.e. sufficient primary and secondary uranium to meet the projected nuclear reactor requirements until around 2015) and thus an increase in uranium prices. In order to ensure that the authorities and other stakeholders could consider how to best manage the “Uranium Rush”, the Namibian Government placed a moratorium on further (new) uranium prospecting licences in 2007 (Ministry of Mines and Energy (MME), 2010).

2009/2010 In 2009, the Southern African Institute for Environmental Assessment (SAIEA) was contracted by the Government of the Republic of Namibia (GRN), with funding provided by the German Government through the German-Namibian Technical Cooperation Project of the Geological Surveys of Germany (BGR) and Namibia (GSN), to undertake a Strategic Environmental Assessment (SEA) (*a tool that allows decision-makers to integrate the full spectrum of environmental considerations within the planning process*). SAIEA’s Terms of Reference included the: i) provision of recommendations on accepted overall strategic approaches for sustainable mining development in the Erongo Region; ii) development and assessment of viable scenarios of mining and associated developments as a basis for subsequent decision-making and formal planning; iii) provision of guidance for overall solutions on crucial (cumulative) impacts and challenges stemming from the mining operations; and iv) outline for a Strategic Environmental Management Plan (SEMP) (Ministry of Mines and Energy (MME), 2010).

20 May 2010 “Russian President Dmitry Medvedev and his Namibian counterpart signed a memorandum on cooperation in exploration and development of Namibian uranium deposits. The document lays out opportunities for joint ventures in exploration, development and processing of uranium ore as well as uranium enrichment. The memorandum is effective for five years and may be automatically prolonged. Rosatom head Sergei Kiriyenko said Russia would invest some \$1 billion in uranium deposits in Namibia.” (see <http://wise-uranium.org/upna.html>).

2017 The Ministry of Mines and Energy (MME) lifts the moratorium (on new applications for exploration licences (EPLs) on nuclear fuel minerals (uranium)) (Anonymous, 2017).

- 04 October 2022** SAUMA Representative visits Hon. Minister Shifeta
- 05 October 2022** SAUMA Representatives discuss the challenges posed to the Stampriet Aquifer drinking water and possible impact on Namibian producers during NAU Congress
- 12 October 2022** SAUMA Presentation to the Environmental Commissioner (EC) Mufeti, Deputy EC Garus-Oas and staff of MEFT
- 28 October 2022** Meeting with the 29ners Group, including the Manager of the Chamber of Mines
- 10 November 2022** SAUMA Representatives obtain legal advice - 3 farmers have been invited to appear before the Ancillary Rights Commission to explain why they refuse to grant access to their land to the Prospector Headspring Investments
- 16 November 2022** Legal representative attends meeting with Ancillary Rights Commission. The matter was postponed to 29 November 2022 for the parties to submit their arrangement to the Commission in writing.
- 17 November 2022** SAUMA Presentation to the SADC Groundwater Conference
- 22 November 2022** Meeting with the Ombudsman

Recommendation

The SAUMC/SAUMA is of the opinion that it would be in the best interest of all parties that a moratorium be placed on all exploration activities in the SAB, and a Strategic Environmental Assessment (SEA) be carried out for the “Uranium Rush” in the Omaheke and Hardap Regions.

References

- Anonymous. 2017. *NAMIBIA LIFTS MORATORIUM ON NEW URANIUM EXPLORATION APPLICATIONS*. NAMIBIA ECONOMIST, JANUARY 26, 2017. <https://economist.com.na/21996/mining-energy/namibia-lifts-moratorium-on-new-uranium-exploration-applications/>
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