

Nutrition and Food Security Alliance of Namibia

<https://www.nafsan.org>

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Republic of Namibia
Ministry of Environment, Forestry and Tourism
Private Bag 13306 - Windhoek, Namibia

Att.: The Environmental Commissioner: Mr. Timotheus Mufeti

Windhoek, 23 February 2024

Dear Sir/Madam,

Re: 230104000751 – OBJECTION to Proposed Wings Project for Pilot In-Situ Leaching (ISL) in the Omaheke and Hardap Regions, Namibia

The Nutrition and Food Security Alliance of Namibia (NAFSAN – www.nafsan.org) is a member-based non-profit umbrella body, representing civil society, academic institutions and the private sector within the national and regional Coordination Structures of the revised Food and Nutrition Security Policy, launched by the Prime Minister in 2021 - <https://opm.gov.na/national-food-and-nutrition-security> & www.nafsan.org/nfns --> see attached endorsement letter.

Based on our strong and healthy partnership with the Namibian government we need to raise our grave concerns regarding the ongoing threats to the huge and essential underground water reserves in the Omaheke and Hardap regions, putting future food and nutrition security and the life, health and future prosperity of the Namibian people severely at risk.

The current plans for in-situ leaching of uranium, which – according to solid research and various local and international experts – is putting **key underground water sources at extreme risk**, with detrimental consequences for the future life of humans, animals, and plants.

The dire need of the people in Omaheke and Hardap in terms of food security and socio-economic development is very well understood. NAFSAN and its members are therefore working tirelessly to sustainably strengthen not only food and nutrition security in these regions but also socio-economic development, hereby also sourcing funds from international donors.

However, a short-term focus on quick economic gains through highly dangerous in-situ uranium mining that is going to cause chemical and radioactive pollution of invaluable ground water for thousands of years is no acceptable solution and not in the interest of the Namibian people.

As previously registered Interested and Affected Party we hereby **strongly object** to any plans or actions that advance the envisioned in-situ leaching of uranium in Omaheke, Hardap or anywhere else in Namibia, as this ultimately will damage Namibia's socio-economic gain and the health and well-being of her people.

In addition, several UN reports¹ underscore the value of clean and unpolluted water for life on this planet, which is particularly true for an arid country like Namibia, and even more so for climatically dry regions, such as Omaheke and Hardap. Some reports even predict that water may soon be even more valuable than oil, gas, and uranium. Undoubtedly, water is among Namibia's most valuable resources, if not the most valuable one and key to achieving our SDGs.

Hence, proceeding with these extremely risky uranium mining activities would not just put human and animal lives at risk but threaten agricultural activities and the future economic development of the Omaheke and Hardap regions and Namibia as a whole.

NAFSAN and its member organisations hereby not only **object** to the proposed wings project for pilot in-situ leaching, but we sincerely urge the Namibian Government to put a permanent stop to this process and instead to invest in genuinely sustainable development for and together with the communities in these respective areas.

In this regard we are happy to continue our fruitful collaboration with the Namibian government and other stakeholders on national and regional levels, as the malnutrition situations in Omaheke and Hardap are real crises and need our urgent attention, full commitment, and joint actions.

Sincerely,



Ben Schernick,
NAFSAN Director

CC:

Honorable Minister Pohamba Penomwenyo Shifeta (MEFT)

Executive Director (MEFT), Mr. Teofilus Nghitila – Permanent Member, Working Group on 'Water, Environment and Sanitation' within the Food and Nutrition Security Policy's Coordination Structures.

Executive Director (MAWLR), Ms. Ndiyakupi Nghituwamata – Chair of the Food and Nutrition Security Working Groups: 'Food Security' & 'Water, Environment and Sanitation'

Mr. Ben Haraseb, Director at Ministry of Agriculture, Water and Land Reform - 'Food and Nutrition Security Coordinator' at the Food and Nutrition Security National Secretariat

Executive Director (NPC), Ms. Wilhencia Uiras - Chair of the Food and Nutrition Security Working Group: 'Operation Research' and appointed Lead to the Malnutrition Task Team to Omaheke (Feb'24)

Honorable Pijoo Nganate, Governor of the Omaheke Region

Honorable Salomon April, Governor of the Hardap Region

Attachments:

- Endorsement Letter of NAFSAN and its role within the FNS Structures, 23 Sept. 2021
- Open Letter by the Namibian Organic Association (www.noa.org.na), 22 Feb. 2024

¹ <https://www.unwater.org> & <https://reliefweb.int/report/world/global-water-security-2023-assessment>



REPUBLIC OF NAMIBIA

OFFICE OF THE PRIME MINISTER

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Private Bag 13338
WINDHOEK

23 September 2021

Mr. Ben Schernick
Director of NAFSAN
P.O. Box. 40723
Windhoek
Namibia

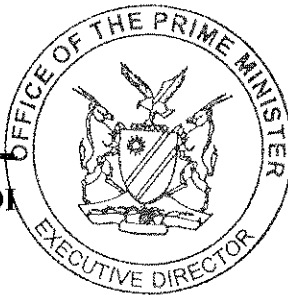
Dear Mr. Schernick,

RE: APPROVAL OF THE REVISED NATIONAL FOOD AND NUTRITION SECURITY POLICY, ITS IMPLEMENTATION ACTION PLAN AND COORDINATION STRUCTURE

1. Our ongoing discussion on the above-mentioned subject matter bears reference.
2. Kindly be informed that Cabinet approved the revised Policy, its Implementation Action Plan and Coordination Structure. Cabinet also endorsed the role of the Nutrition and Food Security Alliance of Namibia (NAFSAN) to serve as technical partner on aspects of food and nutrition security.

Yours Sincerely,

**I-BEN NATANGWE NASHANDI
EXECUTIVE DIRECTOR**



22 February 2024

Open Letter to all Namibian Citizens and Government Institutions:

Re: Call for permanent moratorium on exploration and mining activities for uranium in the Stampriet Transboundary Aquifer System

The Namibian Organic Association is a member-based association with the objective to further organic agriculture across all sectors and for all Namibians. Our association consists of farmers, consumers and traders of organic goods.

We are deeply concerned of the aggressive push to mine uranium from the Stampriet Transboundary Aquifer System, a source of the finest quality drinking water for tens of thousands of Namibians, citizens of Botswana and South Africa.

This aquifer further provides essential drinking water for hundreds of thousands of animals across large tracts of land and irrigates crops that feed Namibians well beyond the south-eastern parts of the country where the aquifer is located.

We are aware of the efforts of Headsprings Investments, a subsidiary of the Russian company Rosatom, and others to turn promising exploration results into uranium mines employing the so-called in-situ leaching process, where sulphuric acid dissolves uranium and other heavy metals from the ore body located within the Stampriet Transboundary Aquifer System. While the uranium is removed other heavy metals stay suspended for extended periods of time, thus contaminating the water body for years to come.

Dissolved heavy metals in water cannot be seen, tasted or smelled. Yet toxic heavy metals are known to cause detriment to health, including cancers and even death.

In November 2002, the Namibian Committee on Economic, Social, and Cultural Rights adopted General Comment No. 15 on the right to water. Article 1.1 states that “The human right to water is indispensable for leading a life in human dignity. It is a prerequisite for the realisation of other human rights”. Comment No. 15 also *defined the right to water as the right of everyone to sufficient, safe, acceptable and physically accessible and affordable water for personal and domestic uses.*

The human right to safe drinking water was also recognized by the UN General Assembly and the Human Rights Council as part of binding international law in 2010. ([UN, 2010](#))

We feel that any risk of contaminating drinking water is irresponsible and not acceptable. Thus we call on the Namibian government and its institutions for a permanent moratorium on all activities that consider or promote the mining of

Board Members: Mareike Voigts, Eckhart Förtsch, Vera Corry, Johannes Negongo, Sanet Brundyn, Dirk Bockmühl, Selma Nasheya, Jacobina Lumambo

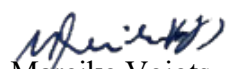


uranium within the greater area served by the Stampriet Transboundary Aquifer System.

We further call on all Namibian citizens to join the growing movement to stop exploration and mining for uranium within the Stampriet Transboundary Aquifer System by signing the petition and form of SAUMA (Stampriet Aquifer Uranium Mining Association) as posted on their website www.saumanamibia.org

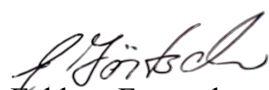
Our actions today will be judged by the generations of tomorrow.

On behalf of all members and supporters of the Namibian Organic Association,



Mareike Voigts

Chairperson: The Namibian Organic Association



Eckhart Foertsch

Vice Chairperson: The Namibian Organic Association



Vera Corry

Secretary: The Namibian Organic Association

Board Members: Mareike Voigts, Eckhart Förtsch, Vera Corry, Johannes Negongo, Sanet Brundyn, Dirk Bockmühl, Selma Nasheya, Jacobina Lumambo