



Land, Environment and Development Project
LEGAL ASSISTANCE CENTRE

October 2024

GREEN HYDROGEN HYPE

INDUSTRIAL ACTIVITIES IN
NAMIBIA'S NATIONAL PARKS PART 3
**The Socio-Economic Fallout for Namibia
in the Absence of a Legal Framework**

By **Corinna van Wyk**

First published by the Rosa Luxemburg Stiftung



SUMMARY

Part 1 of this article examined the issues surrounding the triple planetary crisis of climate change, biodiversity loss and pollution, and why it is regarded as the biggest threat to human rights globally. The question of whether industrial activities should be permitted in national parks which harbour ecosystems that contribute to climate regulation, nutrient cycling and carbon sequestration were also explored. Part 2 discussed the non-compliance with existing legal frameworks, the general lack of a legal framework regulating this sector, the lack of community consultations, and the legal validity of the recently established Green Hydrogen Council. As pointed out in Part 1, multilateral environmental agreements such as the UN Framework Convention on Climate Change, the Convention on Biological Diversity and the UN Convention to Combat Desertification include the common but differentiated responsibilities, which recognise that developed countries are primarily responsible for environmental crises and should therefore take the lead in stopping them. This part of the article takes a closer look at the role of investors from developed countries and the neo-colonial approach that has emerged in the wake of the hydrogen hype.

1. THE ROLE OF INTERNATIONAL INVESTORS

International investors and banks often champion sustainability and responsible investing through the lens of human rights, access to natural resources, and climate change mitigation.¹ However, there is a troubling possibility that in supporting projects such as green hydrogen production in developing countries for their own benefit, they may not consistently apply their own standards in areas where the projects are located.² Pressured by economic incentives and the allure of emerging markets, these financial entities might overlook or turn a blind eye to potential human rights

¹ See, for example:

- » NewClimate Institute, *Case Study: The landscape of green hydrogen in Namibia*, November 2023 (https://newclimate.org/sites/default/files/2023-11/The%20landscape%20of%20green%20hydrogen%20in%20Namibia_nov2023.pdf): “The European Investment Bank (EIB) and Namibia signed a Joint Declaration to unlock up to EUR 500 million in concessional finances to support the construction of key infrastructure needed for the renewable generation and green hydrogen production.”
- » Hydrogen Central, “Green Hydrogen – Namibia Secures \$544 Million in Climate Finance at COP27 from The Dutch Government and European Investment Bank”, 10 November 2022 (<https://hydrogen-central.com/green-hydrogen-namibia-secures-544-million-in-climate-finance-cop27-dutch-government-and-european-investment-bank/>): At the COP27 summit, Namibia announced that it had secured over €540 million (\$544million) in climate finance from the Dutch government. This financial support will further boost the country’s efforts to position itself as a renewable energy hub in Africa by producing green hydrogen.
- » Energy Capital & Power, “Namibia’s Progressive Leap Towards a Green Hydrogen Economy”, 5 February 2024 (<https://energycapitalpower.com/namibia-green-hydrogen-economy/>): The EU pledged €1 billion towards Namibia’s green hydrogen value chain, including infrastructure development at the Port of Walvis Bay. This commitment underscores the importance of green hydrogen in achieving sustainable development goals and allegedly combating climate change.

² Both Germany and the UK have been subjected to scrutiny by international human rights bodies in respect of their position on human rights violations to land and natural resources. See, for example:

- » “UN Human Rights Committee issues findings on Germany, Ukraine, Armenia and Botswana” (<https://www.ohchr.org/en/press-releases/2021/11/un-human-rights-committee-issues-findings-germany-ukraine-armenia-and>);
- » “Human Rights Watch Issues Damning Verdict for UK” (<https://www.hrw.org/news/2023/01/12/human-rights-watch-issues-damning-verdict-uk>); and
- » Lorenzo Cotula, International Institute for Environment and Development (IIED), “Land and human rights: Towards a rights-based approach for addressing commercial pressures on land” (https://www.ohchr.org/sites/default/files/Documents/HRBodies/CESCR/Discussions/2019/CESCR_IIED_Contribution_Land.pdf).

violations, exploitation of natural resources, and environmental-impact concerns associated with such projects.³ This inconsistency can lead to a disconnect between espoused values and actual practices, raising questions about the true commitment of international investors and banks to uphold their ethical standards and ensure sustainable development in the global transition towards renewable energy sources. This oversight could be mirroring the very same approach taken by the leaders of the countries that colonised Namibia.

Hydrogen production may promise an economic boost for some, but it does not come without risks and compromises that need settling, *transparently*, before production activities are implemented.⁴ Seemingly these factors are already being undermined, given that multiple international financial investments have been secured for mass-producing hydrogen along Namibia's only coastline, in spite of existing management plans that clearly forbid construction and activities that are detrimental to the environment, and without hydrogen-specific legislation to control or manage any possible harm. In essence, proceeding to secure international finances without having legal protection in place to safeguard Namibia's ecosystem places the country's natural resources, the livelihoods of its local peoples and its economic future in jeopardy.

2. THE NAMIBIAN ECONOMY

Mining, fishing and tourism are currently the primary drivers of Namibia's economy. With an estimated annual GDP of US\$5,828 per capita, Namibia is classified as an upper-middle-income country. However, it is no secret that Namibia has an extremely unequal and disproportionate distribution of income, with an extremely skewed standard of living between the rich and the poor.⁵

In 2021 the World Bank projected the incidence of poverty in Namibia to be at 64% of the entire population of approximately 2,5 million.⁶ About 60% of the 64% are people living in rural areas and under extreme poverty. Moreover, although Namibia covers a vast land area, land habitation is problematic in that much of the land is uninhabitable by humans. On the other hand, uninhabited land has benefits for Namibia because it hosts known and unknown species of fauna and flora of interest to scientists, tourists and indigenous peoples, who respect the pristine landscapes. The land attracts sufficient incentive for its uniqueness and contributes greatly to the Namibian economy. At the same time it provides access to natural resources for the descendants of peoples who have occupied certain areas for thousands of years, such as the Ovahimba⁷ in Kunene Region, the Khwe San⁸ of Bwabwata in Kavango East Region, and peoples who were evicted from their

³ Jennifer Bansard and Mika Schröder, "The Sustainable Use of Natural Resources: The Governance Challenge", International Institute for Sustainable Development, 15 April 2021 (<https://www.iisd.org/articles/deep-dive/sustainable-use-natural-resources-governance-challenge>).

⁴ This refers to the "precautionary principle", which entails caution and review before adopting innovations that could harm an environment or ecosystem. For a full explanation see, for example, https://en.wikipedia.org/wiki/Precautionary_principle.

⁵ Wikipedia, "Economy of Namibia" (https://en.m.wikipedia.org/wiki/Economy_of_Namibia#:~:text=Namibia%20is%20a%20higher%2Dmiddle,distribution%20and%20standard%20of%20living).

⁶ World Bank Group, "Poverty & Equity Brief – Africa Eastern and Southern: Namibia", April 2021 (https://databankfiles.worldbank.org/public/ddpext_download/poverty/987B9C90-CB9F-4D93-AE8C-750588BF00QA/AM2020/Global_POVEQ_NAM.pdf).

⁷ Siziwe Mota, "Protecting Rights of the Himba Indigenous Community and Kunene River through Community Protocols", International Rivers, 28 February 2023 (<https://www.internationalrivers.org/news/protecting-rights-of-the-himba-and-kunene-river-through-community-protocols/>).

⁸ LAC Land, Environment and Development Project, note regarding a Parliamentary Standing Committee fact-finding visit to Bwabwata National Park in March 2022 (www.lac.org.na/projects/lead/Pdf/Bwabwata_National_Park_Hambukushu.pdf).

ancestral land and still fight to return, such as the Hai||om San⁹ who inhabited what is now Etosha National Park. However, history has drawn a clear storyline of how, prior to Independence in 1990, Namibians were denied access to the resources that they owned and needed for survival as humans and as indigenous communities with cultural attachments to the land on which they live. Colonisers grabbed land from Namibians in the name of development, yet development has been slow and selective, with opportunities for foreigners and a few elites, and poverty conditions for the rest.¹⁰

According to the masterminds of the proposed hydrogen projects envisaged for Namibia, this time it will be different; these projects, they say, are going to change the status quo of Namibia.¹¹ However, it appears that this may be from an economics perspective only, and for the satisfaction of a very limited number of Namibians, again.¹²

Many argue that wealth is not measured by the amount of money one has. In the Namibian context, the vast majority of poor people are poor because the denial of access to land and natural resources has restricted their ability to develop and sustain livelihoods. This issue has never been prioritised and yet it is the primary reason for Namibians taking up the struggle for independence.

With more than half of the population dependent on basic natural resources for survival, the green hydrogen projects appear to be designed to come at a very high environmental and social cost to the detriment of vulnerable peoples in Namibia. While the world forges the transition from fossil fuels (a debate for another day), Namibia stands to lose its unique identity and contribute greatly to the destruction of its own ecosystems both inland and along its only coast. This could possibly enhance its own climate crisis and thereby reduce sustainable development in the future.¹³

Risks, compromises and myths associated with the ‘secret’¹⁴ dealings among the ‘green bodies’ concerning green hydrogen production continue to leave the vulnerable majority of Namibians

⁹ LAC, “The Etosha case: Who can bring ancestral land rights claims?” (https://www.lac.org.na/news/probono/ProBono_79-ETOSHA_CASE.pdf).

¹⁰ Liina Kalili, “Ownership, rights and access to minerals in Namibia: A contemporary legal perspective”, University of Namibia 2019 (<https://repository.unam.edu.na/handle/11070/2871>).

¹¹ Ventures Africa, “Namibian Hydrogen Commissioner James Mnyupe to Drive Green Hydrogen Dialogue and Multi-Billion Dollar Hydrogen Projects at African Energy Week (AEW) 2022” (<https://venturesafrica.com/apostories/namibian-hydrogen-commissioner-james-mnyupe-to-drive-green-hydrogen-dialogue-and-multi-billion-dollar-hydrogen-projects-at-african-energy-week-aw-2022/>).

¹² Gondwana Collection is a Namibian-owned tourism hub with more than 20 lodges across Namibia, strategically located in close proximity to communal areas and national parks where local communities and indigenous people ought to manage and administer natural resources (<https://gondwana-collection.com>). After enquiring about the Gondwana lodges flourishing in the southern parts of Namibia, it came to light that although Gondwana vouches for community development and maintaining of cultures in Namibia, these lodges (totally inaccessible for the local communities) are fully booked for at least five years, with an influx of people interested in the green hydrogen projects and offshore oil and gas activities which have taken Namibia by storm. It is also cause for concern that the Green Hydrogen Commissioner, Mr James Mnyupe, is a director of the Gondwana Collection. See Gondwana Collection Namibia, “In The Spotlight With Vusi Thembekwayo & James Yusufu Mnyupe” (<https://www.youtube.com/watch?v=U2tCFEjVdVg>); “This Is Namibia” (<https://www.youtube.com/watch?v=B3zoK-EMM-s>); and “Gondwana Collection AGM 2023 – Looking Ahead” (<https://www.youtube.com/watch?v=0NSsFBiKiGA>). There is already concern about some kind of ambush of the tourism industry, and one cannot help but wonder whether it has something to do with the industrialisation mission for Namibia. See, for example, Windhoek Express, “Fears over new visa regime” (<https://www.we.com.na/tourism-we/fears-over-new-visa-regime2024-05-27>); Africa Geographic, “Trophy hunted: Namibian desert-adapted lion – here are the facts” (<https://africageographic.com/stories/trophy-hunted-namibian-desert-adapted-lion-here-are-the-facts/>); and *The Namibian*, “Shifeta’s desert deal to cut NWR’s income by N\$175m”, 8 April 2024, (<https://www.namibian.com.na/shifetas-desert-deal-to-cut-nwrs-income-by-n175m/>).

¹³ Climate Change Knowledge Portal, “Namibia – Country Summary” (<https://climateknowledgeportal.worldbank.org/country/namibia>).

¹⁴ *The Namibian*, “Govt secretive on new green hydrogen-linked projects”, 16 August 2023 (<https://www.namibian.com.na/govt-secretive-on-new-green-hydrogen-linked-projects/>).

feeling excluded and fearful about the more-than-probable social, economic and environmental risks that always weigh heavier on the local inhabitants than on any other party involved. Along with the seemingly overbearing political will to drive these projects, indirect threats to the voices of the locals and minorities continue, possibly obscuring the rule of law.¹⁵ Unfortunately the local inhabitants might end up with access to energy but no fish to fry.¹⁶

Much as Namibia needs to secure energy sources for its own people, it appears that exportation is the primary aim of these hydrogen projects (at least for the pilot projects), and the consequences may very well be detrimental back home.¹⁷ The focus of these projects has been the monetary benefit for the country, not the upliftment of its impoverished communities, which cannot be achieved without the input of the communities concerned. This focus is clearly depicted by the exclusion of the local communities from the decision-making processes.

Concerns have been raised by many, but the status quo has remained unexplained.¹⁸ In late 2023, when our late President comfortably admitted that he had known nothing about hydrogen before then,¹⁹ he nevertheless expected local communities' buy-in from a once-off roadshow conducted with selected community members around the country. Public engagement requires much more than distribution of information, and independent Namibia seems not to have learnt from the colonial era: we should know that excluding local communities from matters of development, and implementing development initiatives without proper legislative frameworks to keep all government branches within stringent checks and balances, are unconstitutional actions that threaten the very democracy on which we base the values of our country.

3. THE NEO-COLONIAL APPROACH IN THE ABSENCE OF A REGULATORY FRAMEWORK

The term “neo-colonialism” is used to describe a form of economic and political control that can occur when powerful countries or corporations engage with less-powerful countries, potentially influencing their sovereignty and control over their own resources. In the context of the talks on green hydrogen in Namibia, there are discussions around how Namibia can benefit from global decarbonisation efforts while ensuring that the development of green hydrogen does not lead to a new form of colonialism. For instance, there are concerns about “green colonialism” where the EU’s interest in Africa’s renewable energy potential, including Namibia’s, might lead to a situation

¹⁵ <https://www.civic264.org.na/news/media/president-hage-geingob-warning-locals-not-to-interfere-in-the-green-hydrogen-project-being-developed-in-tsau-khaeb-national-park>; see also <https://www.civic264.org.na/news/media/president-hage-geingob-warning-locals-not-to-interfere-in-the-green-hydrogen-project-being-developed-in-tsau-khaeb-national-park>.

¹⁶ Institute for Public Policy Research (IPPR), *Democracy Report*, “Namibia’s Green Hydrogen Transition: A Summary of the Issues”, November 2022 (<https://ippr.org.na/wp-content/uploads/2022/12/Namibias-Green-Transition-web.pdf>), p.2: “Internationally, scientists are tracking [climate change]. These changes are irreversible ... and have direct implications for activities which support and sustain human beings, especially agriculture, forestry and fishing.”

¹⁷ BBC, “Fishrot: The corruption scandal entwining Namibia and Iceland”, 27 February 2023 (<https://www.bbc.com/news/world-africa-64526018>); and Al Jazeera, “Corruption in Namibia’s fishing industry unveiled”, 1 December 2019 (<https://www.aljazeera.com/news/2019/12/1/exclusive-corruption-in-namibias-fishing-industry-unveiled>).

¹⁸ In November 2023, civil society organisations in Namibia requested government to refrain from signing agreements and to take a drastic step to include local communities in further decisions relating to the hydrogen projects. This correspondence was sent from pillar to post, and recently the first response was that it has been referred to the ministry of Mines and Energy to respond.

¹⁹ <https://www.facebook.com/NewEraNewspaperNamibia/videos/pleased-president-hage-geingob-says-he-initially-did-not-know-about-green-hydrog/977659703320016/>

where the benefits are not equally shared.²⁰ Namibia has been proactive in its green-hydrogen ambitions, with significant milestones including agreements with Germany, Brussels and the EU allegedly in alignment with the Paris Agreement goals.²¹ However, the Paris Agreement recognises (a) ‘the vulnerable’ (people) to climate change and (b) the vulnerable to the measures taken to mitigate climate change.²² Silence on both issues prevails as the hydrogen projects aim to improve the country’s economy but not the current state of the vulnerable. The latter has been mentioned, but the road leading to improvement is vague and without legal force.

Is it a complex issue that involves balancing economic development and environmental sovereignty and equitable distribution of benefits? No, it is not. It is a matter of prioritising the vulnerable above the demands of the elite, and ensuring that the vulnerable have executable legal protection and a platform to state their case and be heard if and when necessary. More particularly, the development of green hydrogen projects in Namibia raises concerns related to governance and legal frameworks. Research highlights the insufficient legal and regulatory framework for this emerging industry in Namibia, which insufficiency could threaten the projects due to capital costs and technological complexities that require a supportive legal environment for investment security.²³

There are also concerns about the lack of transparency in all dealings so far, such as the appointment of a Green Hydrogen Commissioner and Council, the appointment of preferred bidders without following procurement law, failure to conduct strategic location assessments for projects, and the lack of community engagements from the onset of discussions.²⁴ These issues point to the need for an effective regulatory framework that can govern and monitor production, transportation, trade and investment, and can hold those who break laws and cause environmental damage liable for not (a) taking proper precautionary measures to avoid damage, (b) identifying issues in time (c) taking proper steps to mitigate risks, and (d) ensuring proper rehabilitation after project termination.

A robust regulatory framework is essential to protect the interests of Namibians and ensure that more powerful entities do not subject them to unfair practices. It is important for such frameworks to be in place before any agreements are made in order to safeguard sovereignty, ensure fair trade and promote sustainable development that benefits the local communities affected. In respect of green hydrogen, agreements have been made and activities are progressing, but nothing is being said about the progress of any legal framework specific to hydrogen.

No Strategic Environmental and Social Assessment (SESA) was conducted to enable proper, inclusive and transparent planning for the Hyphen project or any other green hydrogen project in Namibia. In terms of a SESA, it is a requirement that alternative site locations be considered before selecting a highly sensitive area for development – i.e. alternatives *outside* any park. Dr Chris Brown,

²⁰ Denisa Skládálová, “Unmasking Green Colonialism in EU-Namibia Hydrogen Deal”, *European Journal of International Law* blog, 28 February 2024 (<https://www.ejiltalk.org/unmasking-green-colonialism-in-eu-namibia-hydrogen-deal/>).

²¹ Guest Contributor, “Pioneering green hydrogen: Vision for Namibia’s sustainable future”, *Namibia Economist*, 29 April 2024 (<https://economist.com.na/87615/columns/pioneering-green-hydrogen-vision-for-namibias-sustainable-future/>).

²² “Human Rights and Safeguards in the New Climate Mechanism established in Article 6, paragraph 4 of the Paris Agreement”, 3 May 2016 (https://www.ohchr.org/sites/default/files/Documents/Issues/Environment/Letter_to_SBSTA_UNFCCC_May2016.pdf).

²³ Donald Matthys, “Lack of legal framework threatens green hydrogen projects”, *The Namibian*, 2 July 2023 (<https://www.namibian.com.na/lack-of-legal-framework-threatens-green-hydrogen-projects/>).

²⁴ Michael Bongani Reinders et al., “Green Hydrogen: Namibia’s gateway to a clean energy future”, *Control Risks*, 4 July 2023 (<https://www.controlrisks.com/our-thinking/insights/green-hydrogen-namibias-gateway-to-a-clean-energy-future>); and Oliver C. Ruppel and Magano Katoole, “A regulatory green hydrogen framework for Namibia”, *Graz Law Working Paper No. 14-2023* (https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4504076).

CEO of the Namibian Chamber of Environment, has stated the following in this regard: *“Turning a large part of the national park, the most biodiverse hyper-arid zone in the world, into an industrial area to produce carbon-neutral hydrogen will be done at the expense of its biodiversity. We are off-setting biodiversity for carbon-neutral hydrogen – and for an industrialised part of the world that has seriously mismanaged its own energy sector as well as its transition to carbon-neutral energy.”*²⁵ So, essentially, we are destroying important parts of our biodiversity (which contributes to our carbon-sink characteristic and tourism industry) for world powers such as Germany, Belgium and the EU, who are not willing to interfere with their own protected areas. This approach of clearly earmarking a sensitive area without doing a site assessment to identify the best location for Namibia (and not necessarily the best location for the most optimal production of green hydrogen for export) amounts to adding salt to the wound. Which part of the precautionary principle have we failed to understand?

The footprint of the first phase of the project alone is so significant (more than 2,000 km² of land) in a pristine area of the national park, and will surely affect several centres of endemism as well as critical habitats for endangered species. According to Dr Brown, *“in terms of global conservation significance, the Tsau //Khaeb National Park (Sperrgebiet) is way ahead of any terrestrial national park in Germany. Yet that country seems happy, indeed eager, to compromise our national park while knowing that their citizens would not allow a single hectare of their national parks to be converted into an industrial site.”*²⁶

Another irony is that the German Government invested in the conservation of the TKNP through a NamParks programme, specifically because of its high-biodiversity and conservation values and its future tourism potential. For Germany to turn around and do away with their past investments is to suggest that they care less for our biodiversity and more about their need for hydrogen energy to ensure that their energy demands are met. This is disconcerting.

Clearing of land is but one concern. Once development starts, social-interaction issues automatically follow, such as human activity, human waste and vehicle pollution that were also specifically restricted in the plans for purposes of conservation. The plan specified that no new roads, no harvesting, no permanent structures, no off-road driving, no mining and no prospecting would be allowed.

The green hydrogen plan is contrary to the objectives for which the Sperrgebiet has been conserved, and if the biome constitutes 90% of the park, the hydrogen plant is most certainly going to have an effect on it. It is clear that there has been no proper consideration of the effects of this multi-billion-dollar project on the conservation of this hotspot and any other environmentally sensitive area affected, and there appears to be an unhealthy degree of urgency on the part of parliamentarians to push these projects without proper planning and community engagement.

As already noted, no independent SESA was conducted to enable proper, inclusive and transparent planning. Agreements were signed even before environmental impact assessments were finalised. The same Minister who signed the TKNP Management Plan granted Hyphen the right to clear extensive land in this highly sensitive area. One has to wonder what caused his change of heart, or is it because the instruction comes from the highest office?

²⁵ Unpublished opinion piece shared with the author of this article in 2024; see also *When Green Hydrogen Turns Red – Threatening a global biodiversity hotspot*, Namibian Chamber of Environment Position Paper, May 2024 (<https://n-c-e.org/wp-content/uploads/Green-hydrogen-Tsau-Khaeb-National-Park-NCE-Position-Paper.pdf>).

²⁶ Ibid.

4. CONCLUSION

The global transition to sustainable and renewable energy sources has led to a growing interest in green hydrogen as a clean and versatile energy carrier with the potential to revolutionise various sectors, including transportation, industry and power generation. Green hydrogen, produced through electrolysis of water using renewable energy sources such as solar and wind power, offers a promising solution to decarbonise energy systems and reduce greenhouse gas emissions.

While the production of green hydrogen may hold great promise for a cleaner and more sustainable future, it is crucial to critically examine the approaches and strategies employed in its production and distribution in the Namibian context. One such perspective that warrants scrutiny is perhaps the neo-colonial approach that may have emerged in the context of green hydrogen production in Namibia. It has all been about the capital gain and not the needs of the people. It is in essence a deliberate attack on the people's welfare, contrary to the values and the spirit of the Constitution.

Critique of a neo-colonial approach in green hydrogen production raises concerns about unequal power dynamics, exploitation of resources, and potentially increased marginalisation of local communities and indigenous populations in areas rich in renewable energy sources. This approach could perpetuate historical patterns of exploitation and exacerbate social and economic inequalities, rather than fostering sustainable development and equitable access to clean energy technologies.

The lack of a concise legal framework has created a space where the integrity of the leaders of the projects can be challenged because of the haste with which agreements are concluded without formal legal structures in place to ensure and guarantee protection of the country, its people and its natural resources.

Furthermore, as the global communities accelerate efforts to transition to a low-carbon economy and achieve climate goals, it is essential to ensure that the production of green hydrogen is carried out in a manner that respects the principles of environmental justice, social equity and inclusive decision-making. By addressing the critiques of the neo-colonial approach and adopting fair and transparent practices in green hydrogen production, we can pave the way for a more sustainable and equitable energy future for all.

Experts in Namibia hold that there is a lack of strategic thinking and planning, and an indecent haste with which Germany, the EU and Namibian politicians are pushing this green agenda forward despite its considerable ecological and socio-economic harm to an already vulnerable climate.

The failure to commit to existing environmental policies and management plans, and to ensure that the Government agrees and is in control of projects that ensure and uphold the principle of separation of powers, and to ensure transparency and inclusive participation of the community, are a few serious issues of concern relating to the hydrogen projects in Namibia. Past experience has paved the way to upholding the relevant principles, and the intentional, deliberate violation of these principles clearly threatens the rule of law that governs Namibia, and provides a clear idea of our Government's level of commitment to its promises and to making decisions that benefit the people instead of leaving a legacy that completely wipes out the landscape of Namibia.

Project funding: **Rosa Luxemburg Stiftung**

Project supervisor: **Corinna van Wyk**

Printing: **John Meinert Printing (Pty) Ltd**

A PDF of this article is posted on the LAC website.

Hard copies are available at the LAC office.



LEGAL ASSISTANCE CENTRE

Land, Environment and Development (LEAD) Project

4 Marien Ngouabi St, Windhoek • P.O. Box 604, Windhoek, Namibia

Telephone: (+264) (0)61-223356 • Fax: (+264) (0)61-234953

Email: info@lac.org.na • Website: www.lac.org.na