



National Heritage Council of Namibia

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OFFICE OF THE DIRECTOR

APPLICATION FOR CONSENT

(Sections 53(7) and 55(8) of the National Heritage Act, 2004 (Act No. 27 of 2004))

CONDITIONS AND INSTRUCTIONS

1. The receipt issued serves as a reference when making enquiries.
2. Works and activities applied for under section C, of this application, is subject to an environmental impact assessment at the applicant's expense.
3. Instructions for completion:

Applicants must complete the relevant parts of this application.

A. APPLICANT'S DETAILS

1. Name and address of applicant

**Bluestate Investments CC
P. O Box 26826
6 Amasoniet Street
WINDHOEK, NAMIBIA**

2. Full name and designation of the person in charge of undertaking the works or activities:

**Ms Ming Shi- General Manager
Tel: +264 -61-402036
Mobile: +264811433788
Email: maggieming2012@hotmail.com**

3. Full name and personal details of researcher, contractor or person in charge of the proposed works or activities:

ENVIRONMENTAL CONSULTANTS

**Dr Sindila Mwiya (Environmental Assessment Practitioner- EAP)
Risk-Based Solutions (RBS) CC
41 Feld Street Ausspannplatz, Cnr of Lazarett and Feld Street
P. O. Box 1839, WINDHOEK, NAMIBIA, Tel: +264 - 61- 306058; Fax: +264 - 61- 306059,
Mobile: + 264-811413229; Email: smwiya@rbs.com.na**

ARCHAEOLOGICAL SPECIALIST CONSULTANT

Mr. Mowa Eliot Sibungo
Trading as ESM Trading cc.
Mobile: 0812066372
Email: esmowa@gmail.com

4. Academic qualifications, skills, occupation and competencies of the person in charge mentioned under A2 above.
1. **Ms Ming Shi is the General Manager is a qualified and experienced business person responsible for operations of Bluesate Investments CC. She has experience in business operations and management of exploration and mining contractors.**
 2. **Dr Sindila Mwiya is a qualified and experienced Environmental Consultant who was the Environmental Assessment Practitioner EAP) for the project. Dr Sindila Mwiya has more than eighteen (18) years of practical field-based technical industry experience in Environmental Assessment (SEA, EIA, EMP, EMS), Energy (Renewable and Non-renewable energy sources), onshore and offshore resources (minerals, oil, gas and water) exploration / prospecting, operation and utilisation, covering general and specialist technical exploration and recovery support, Health, Safety and Environment (HSE) permitting for Geophysical Surveys such as 2D, 3D and 4D Seismic, Gravity and Electromagnetic Surveys for mining and petroleum (oil and gas) operations support, through to engineering planning, layout, designing, logistical support, recovery, production / operations, compliance monitoring, rehabilitation, closure and aftercare projects lifecycles.**
 3. **Mr. Mowa Eliot Sibungo is a qualified and experienced Archaeologist and Heritage Specialist consultant responsible for archaeological contribution to the Environmental Impact Assessment (EIA) report for the proposed minerals exploration activities in the EPL 8020 in Karibib District in Erongo Region. He holds a Bachelor of Education: Full Major in History, Geography and Environmental studies (UNAM 2008), a Master of Arts in Maritime Archaeology and History. (University of Bristol 2010) and ongoing PhD in Archaeology candidate (2018- 2020 University of Pretoria), South Africa.**

5. Previous permits issued in Namibia:

None

6. Period for which permit is required:

The Consent is required for the duration of the proposed minerals exploration activities within the EPL.

7. Date by which permit is required: **April 2021**

B: WORKS OR ACTIVITIES

15. Geographic location and address (farm, village, settlement, town, region, magisterial district, constituency, Global Positioning System coordinates) of the site, protected place, or protected object where works or activities are proposed:

Bluestate Investments (Pty) Ltd (the “Proponent”) holds mineral rights under the Exclusive Prospecting License (EPL) No. 8020 for base and rare metals, dimension stones, industrial minerals, and precious metals. The EPL 8020 was granted on the 16/11/2020 and will expire on the 15/11/2023.

The EPL No. 8020 is located in the Karibib District of the Erongo Region, in the west-central Namibia. The EPL 8020 has a total area of 19836.3893 Ha and covers parts of the communal land around Otjimbingwe and portions of Farms Neu-Schwaben, Goas, Kuibes and Anawood South.

The following is the summary of the proposed minerals exploration activities:

- (i) Initial desktop exploration activities covering the review of existing information and all previous prospecting activities undertaken in the general area in order identify any potential target/s.**
- (ii) Regional reconnaissance assessment covering field-based activities such as regional mapping and sampling to identify and verify potential targeted areas as delineated during the desktop stage (i) above.**
- (iii) Initial local field-based activities such as widely spaced geological mapping, sampling, surveying and possible widely spaced trenching and drilling in order to test the viability of any delineated local target, and.**
- (iv) Detailed local field-based activities such as localised site-specific detailed geological mapping, trenching, bulk sampling, surveying and detailed drilling to determine the feasibility of any delineated local targets.**

The settlement of Otjimbingwe which is a centre of Herero tradition and culture and very rich history dating back to the early 18th century is the nearest settlement situated to the southeast of the EPL area. It is situated about 30km from the centre of the EPL area. Karibib, the nearest major town is situated about 60 km to the north from the centre of the EPL area.

Access to the license area is through the C32 and D1953 roads from Karibib. Within the minerals license area, several minor gravel farm roads and tracks already exist and are linked to the C32 and D1953. The general EPL area has no mobile services or fixed telecommunication or major electricity infrastructure.

The proposed exploration programme will not require major water and energy supply services. Exploration water supply especially for drilling will be obtained from the local boreholes or supplied by a tanker as may be required. Electricity supply will be provided by generators and solar.

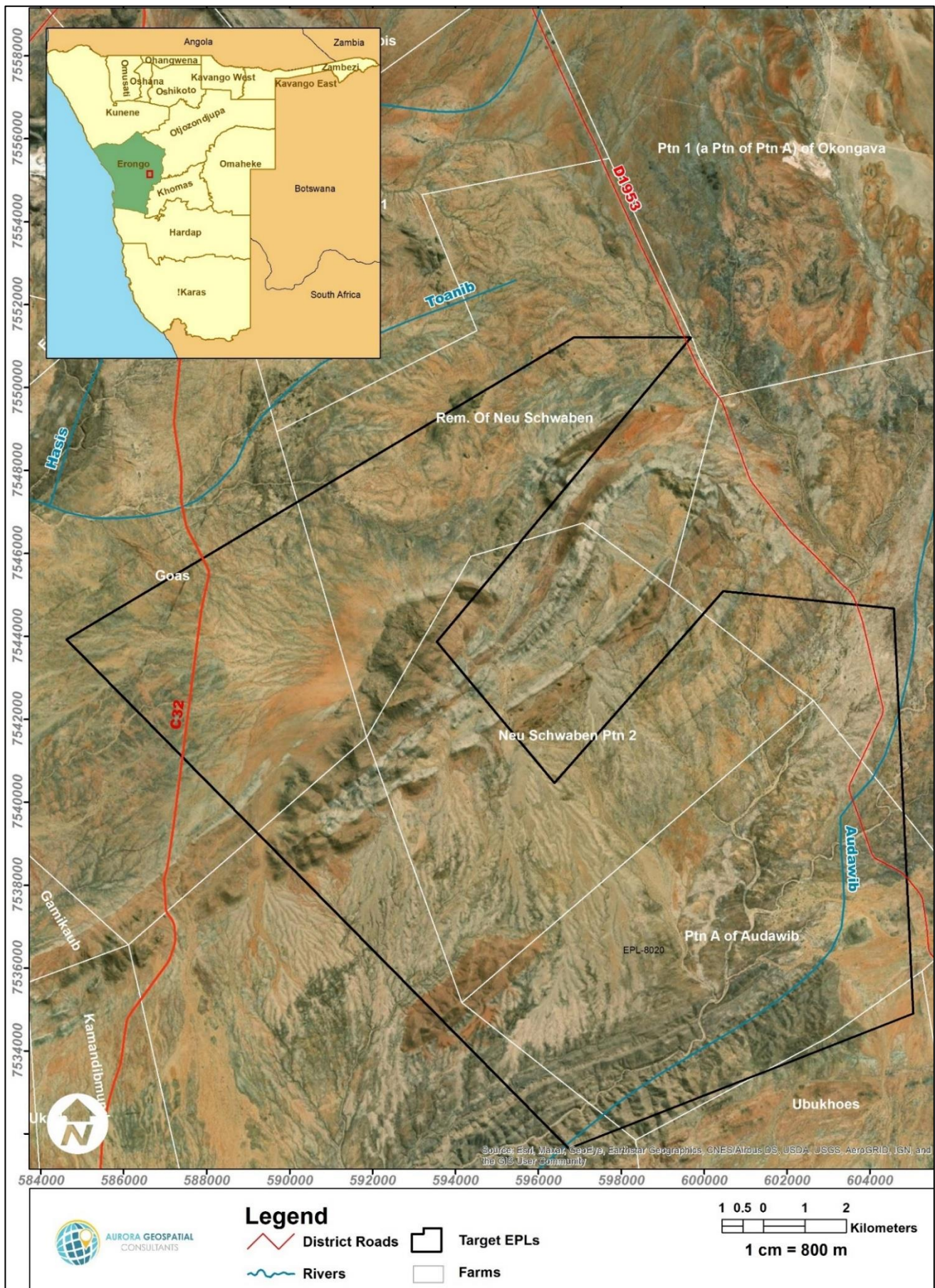


Figure 1: Detailed location of the EPL 8020 located in Karibib District, Erongo Region, North-Central Namibia (Location Reference: Latitude: -22.230248, Longitude: 15.916652).

16. Detailed description of the nature of works or activities for which the permit is applied for: (e.g. excavation, construction, filming etc) (*Attach additional and supporting information if the space on the form is insufficient.*)

The Proponent intends to conduct exploration / prospecting activities starting with desktop studies and aerial surveys, followed by regional field-based reconnaissance work and if the results are positive, implement detailed site-specific field-based activities over key site-specific localities using techniques such as geological mapping, geophysical surveys, trenching, drilling and sampling for laboratory tests.

If the proposed exploration activities lead to positive results, the exploration data collected will then be put together into a prefeasibility report and if the prefeasibility results prove positive, a detailed feasibility study supported by detailed site-specific drilling, bulk sampling and laboratory testing will be undertaken.

A positive feasibility study will be required to support the application for a Mining License (ML) together with a new site-specific Environmental Impact Assessment (EIA) and Environmental Management Plan (EMP) with specialist site-specific studies such as flora, fauna, socioeconomic, water, traffic, dust, and noise modelling and archaeology being undertaken to support the application for the new ECC for mining and minerals process.

Currently, there no minerals deposits known to exist within the EPL area and the Proponent intend to conduct prospecting activities as part of the testing of the developed theoretical geological and minerals depositional models. There is no guarantee whatsoever that the prospecting activities will find economic minerals resources that could led to the development of mine.

C: UNDERTAKING BY APPLICANT

17. I **Ms Ming Shi- General Manager** (the person in charge of undertaking the works or activities) and (where applicable) being head of Bluetsate Investment, institute, hereby undertake to strictly observe the terms and conditions under which the National Heritage Council may issue the permit.

Signature  dated 6th April 2021


Permit No. (For office use only)
(Consecutive number & year of issue)



ESM CULTURAL
HERITAGE
CONSULTANTS

Trading as ESM Trading cc.Reg no: cc/2013/05545
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PROJECT DETAILS

Title	Heritage Impact Assessment (HIA) for the exploration of base and rare metals, dimension stones, industrial minerals, and precious metals on EPL 8020 located between Karibib and Otjimbingwe, Erongo region.		
Report Status	Final Desktop Archaeological Impact Assessment Report		
Proponent	Bluestate Investments (Pty) Ltd P. O Box 26826 6 Amasoniet Street Windhoek, Namibia Attention: Ms. Ming Shi- General Manager Tel: +264 -61-402036 Email: maggieming2012@hotmail.com		
EIA Consulting Company	Risk-Based Solutions (RBS) CC, the consulting arm of Foresight Group Namibia (FGN) (PTY) LTD Attention: Dr. Sindila Mwiya Email: smwiya@rbs.com.na		
Heritage Practitioner	ESM Cultural Heritage Consultants Trading as ESM Trading cc Contact Person: Mr Eliot Mowa Contact Number: +264 (81) 206 6372 Email: esmowa@gmail.com		
Report date	7 th April 2021		
	Name	Signature	Date
Author	Eliot Mowa		7 th April 2021

LEGAL NOTICE

Heritage and Archaeological Impact Assessment (EIA) for the exploration of base and rare metals, dimension stones, industrial minerals, and precious metals on EPL 8020 located between Karibib and Otjimbingwe, Erongo region.

This report or any portion thereof and any associated documentation remain the property of ESM Cultural Heritage Consultants until the mandatory effects payment of all fees and disbursements due to ESM in terms of the ESM Conditions of Contract and Project Acceptance Form. Notwithstanding the aforesaid, any reproduction, duplication, copying, adaptation, editing, change, disclosure, publication, distribution, incorporation, modification, lending, transfer, sending, delivering, serving or broadcasting must be authorised in writing by ESM

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1. Introduction

The Government of Namibia recognises that the exploration and development of its mineral wealth could best be undertaken by the private sector. It therefore, focuses on creating an enabling environment through appropriate competitive policy and regulatory frameworks for the promotion of private sector investment coupled with the provision of national geo-scientific databases essential for attracting competitive exploration and mining (Draft Minerals Policy of Namibia, MME). It is with this background that Bluestate Investments (Pty) Ltd has decided to conduct exploration activities for the base and rare metals, dimension stones, industrial minerals, and precious metals on EPL 8020. The proponent wants to carry out these exploration activities with the hope that if they yield positive results then a feasibility study and mapping of geological minerals will be conducted at a later stage. At this stage, however, the exploration activity is aimed at establishing the availability and type of minerals likely to be found within EPL 8020 for the purpose outlined above as such no major economic benefits will be derived from the project.

Nevertheless, the proposed project is likely to benefit the Namibian government through the payment of the annual licence fees to the Ministry of Mines and Energy. Further, the project will likely provide provisional contractual employment opportunities for the local communities during the expansion of the mineral of the subsurface knowledge-base: The exploration data to be generated will be highly useful in the search for future subsurface resources such as minerals, water, geothermal and general geoscience research, and development. Contribution to the subsurface knowledge base that will promote the coexistence of subsurface operations with other land users in Namibia, and contribution to the development of local infrastructures such as community rural water supply through Corporate Socially Responsible (CSR) that the Proponent may undertake during the exploration period. Unrestrained natural resource mining/excavation has resulted in undesirable environmental effects in some areas in the country. This has been largely attributed to the fact that people were under no obligation to rehabilitate the affected areas and thus left behind large open pits/quarries, which pose a danger to both humans and animals. From the point of view of the environmental impact created.

Bluestate Investments (Pty) Ltd, hereinafter referred to as the proponent intends to carry out the following activity:

- **Heritage Impact Assessment (HIA) for the exploration of base and rare metals, dimension stones, industrial minerals, and precious metals on EPL 8020 located between Karibib and Otjimbingwe.**

The objective of the intended Heritage & Archaeological Impact Assessment (HAIA) is thus needed to assess the potential heritage and archaeological impacts associated with the intended exploration activities for dimension stone on EPL 8020 (**Figure 1**) in the Erongo Region and also to formulate a site management plan (SMP) as stipulated under the National Heritage Act 27 of 2004 (Section 58) read together with the provisions of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012).

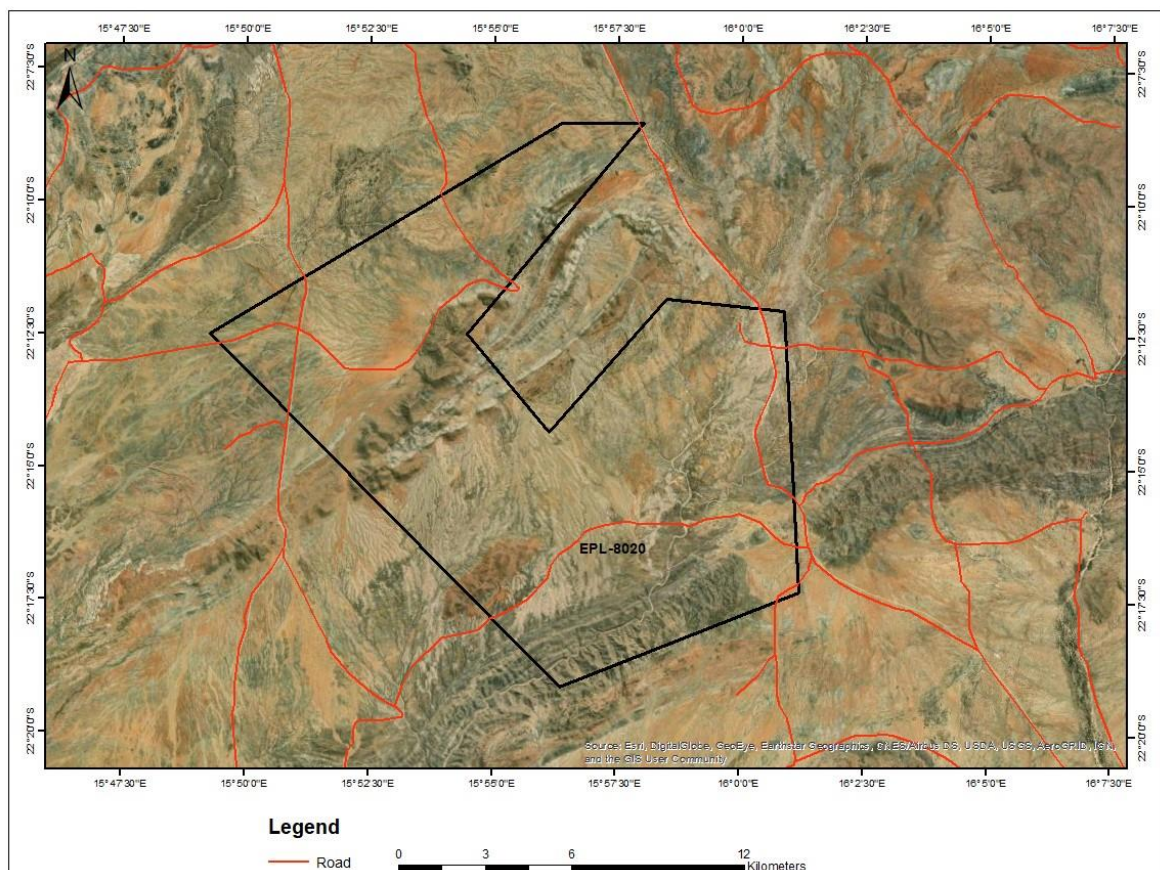


Figure 1: Satellite map of EPL 8020 between the town of Karibib and Otjimbingwe, Erongo region.

ESM Cultural Heritage Consultants (ESM CHC) was appointed on behalf of the proponent to conduct a Heritage Impact Assessment & archaeological desktop assessment study.

2. Legislations

In Namibia, the legal instrument for legal protection of heritage sites and objects is the National Heritage Act (No. 27 of 2004). Unfortunately, there are no regulations for the realization of the National Heritage Act requirements about impact assessment. Heritage impact assessments therefore take place under the activities of the Environmental Management Act (7 of 2007), which particularly includes cultural heritage elements in its definition of environment. The List of activities that may not be undertaken without Environmental Clearance Certificate: Environmental Management Act, 2007 (Govt Notice 29 of 2012), and the Environmental Impact Assessment Regulations: Environmental Management Act, 2007 (Govt Notice 30 of 2012) both apply to the management of impacts on heritage & archaeological sites and remains whether these are considered in detail by the environmental assessment or not. In its application, the National Heritage Act (Section 1 of 2004) defines heritage resources as those of geological and rare objects; paleontological; archaeological; ethnographic objects; historical objects/sites; maritime heritage; built monuments; mining sites as well as objects of scientific interests.

3. Approach to study

3.1 Terms of reference

The objectives of this heritage & archaeological impact assessment were to identify and locate sensitive heritage resources within the limit of EPL 8020 that could be negatively affected by the exploration of dimension stone prospecting and its operations. Additionally, the assessment intended to establish heritage significances of possible resources and assess their vulnerability, estimates the extent of the possible impacts; establish cumulative impacts and suggests practical management actions for the conservation of heritage resources (*if present*). The impact assessment forms the basis of recommended management actions to avoid or reduce negative impacts and sets out associated long-term monitoring requirements. The assessment is therefore required to satisfy the requirements of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012), and those of the National Heritage Act (2004). The activities to be carried out by the proponent during the course of the exploration include but might not be limited to the trenching and drilling as well as the supporting campsite in absence of any suitable accommodation these are the activities by which impact on heritage is measured against.

3.2 Methodology

This Heritage & Archaeological Impact Assessment followed desktop-based assessments. These methodologies are standards for environmental assessment and the protocol developed for archaeological heritage assessment in Namibia, which are in line with international best practices. Desktop information was fashioned from current and existing heritage archives. These were taken from existing heritage

records comprising those from National Heritage Council, archaeological GIS spatial data and record that has been substantially exposed during the last decades, by a series of detailed archaeological assessments carried out in the during the mineral investigation and mining operations, and the development of infrastructure required by these operations. These sources were then supplemented by ESM CHC’s information of Namibia’s heritage resource distributions.

Sensitivity and susceptibility rating scales, aimed at finding out the nature of vulnerability and sensitivity of heritage resources that are likely to be impacted by the exploration activities was adopted as per assessment objectives. Their vulnerability to the disturbance in the course of exploration that includes drilling was evaluated according to parallel 0-5 scales, abridged in Table 1.

Table 1: Rating scales for the assessment of archaeological significance and vulnerability as developed by the QRN.

Significance Rating	
0	No heritage significance
1	Disturbed or secondary context, without diagnostic materials
2	Isolated minor find in undisturbed primary context, with diagnostic materials
3	Archaeological and paleontological site (s) forming part of an identifiable local distribution or group
4	Multi-component site (s), or central site (s) with high research potential
5	Major archaeological or paleontological site (s) containing unique evidence of high regional significances
Vulnerability Rating	
0	Not vulnerable
1	No threat posed by current or proposed development activities
2	Low or indirect threat from possible consequences of development (e.g. soil erosion)
3	Probable threat from inadvertent disturbance due to proximity of development
4	High likelihood of partial disturbance or destruction due to close proximity of development
5	Direct and certain threat of major disturbance or total destruction

Concerning each specific source of impact risk to heritage resources, the assessment methodology estimated the extent of the impact, the magnitude of impact, and the duration of these impacts. The scales of estimation are set out and explained in Table 2. The assessment methodology further estimated the potential reversibility of the identified impacts as reflected in Table 3.

Table 2: Assessment criteria for the evaluation of cumulative impacts on archaeological sites developed by the QRN.

3.3 Assumptions and limitations

CRITERIA	CATEGORY	DESCRIPTION
Extent or spatial influence of impact	National Regional Local	Within Namibia Within the Region On site or within 200 m of the impact site impact
Magnitude of impact (at the indicated spatial scale)	High Medium Low Very Low Zero	Social and/or natural functions and/ or processes are severely altered Social and/or natural functions and/ or processes are notably altered Social and/or natural functions and/ or processes are slightly altered Social and/or natural functions and/ or processes are negligibly altered Social and/or natural functions and/ or processes remain unaltered
Duration of impact	Short Term Medium Term Long Term	Up to 3 years 4 to 10 years after construction More than 10 years after construction

This heritage impact assessment described here are desktop studies and no field assessment has been undertaken. It is possible to predict the likely occurrence of further archaeological sites with some accuracy and to present a general statement of the local archaeological site distribution. However, since the previous surveys in the area relied on limited to surface observations, it is necessary to caution the proponent that hidden, or buried archaeological remains might be exposed during the exploration of dimension stones (see 8. Management plan, especially Chance Finds Procedure (CFP)). As indicated earlier previous studies observed, the surface for archaeological finds, thus there is a possibility that certain archaeological finds might be buried beneath the surface. Thus as a precaution and best practice, we are recommending the proponent strictly follow the chance find procedure as the project progresses should any archaeological objects be found during drilling and trenching. The Chance finds procedure is outlined in the National Heritage Council booklet,

(2017) and the proponent will be supplied with a copy. Failure to follow and implement such procedure will result in appropriate action be taken against the proponent as per the Heritage Act of 2004.

4. Geological settings of EPL 8020

The EPL 8020 has a total area of 46712 Ha and covers parts of the communal land around Otjimbingwe and portions of Farms Neu-Schwaben, Goas, Kuibes and Anawo to the South. The general local topography comprises central topographic high mountain areas trending in the northeast-southwest direction with topographic lower areas on either side. The landscape is dendritic in nature cultivated by several minor and major Ephemeral River networks such as the Omusoma and Audawib flowing into the Swakop ephemeral River. The Swakop ephemeral River does not cut through the EPL area and is situated to the south of the license. The EPL area is dominated by communal land as well as private commercial farmland. The land use of the area is mainly dominated by agriculture centered on cattle and small stock.

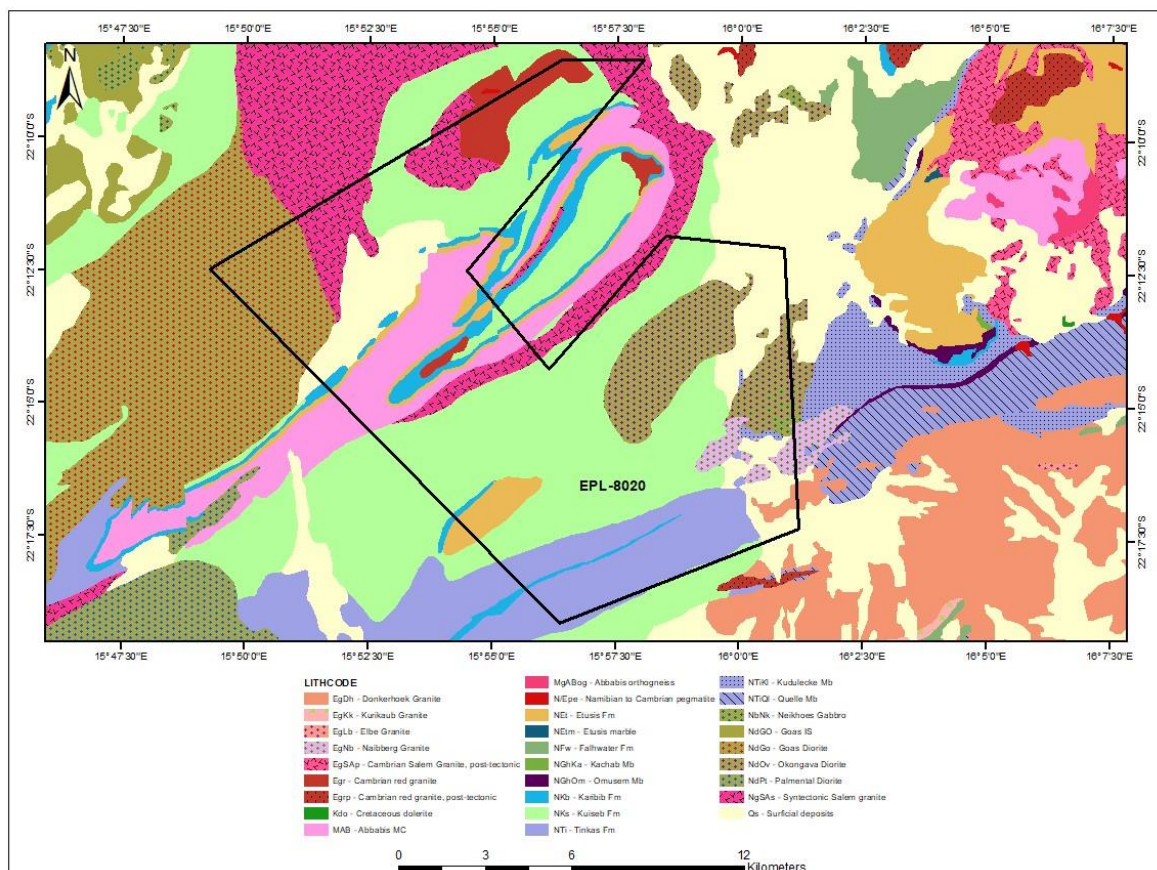


Figure 2: Geological map of EPL 8020 area between Otjimbingwe and Karibib surroundings.

According to (Jung & Berndt 2020), the geology of Otjimbingwe defined in (Figure 2) dates back from the ~545 Million years ago and is dominated by alkaline complex (Damara orogen) ranging in composition from monzodiorites to syenites and

granites as a result of fractional crystallization and crustal assimilation but were also influenced by accumulation processes involving hornblende. Previous archaeological surveys in the Erongo Region have shown a correlation between archaeological site location and landscape.

5. Contexts of heritage in Erongo region

Erongo Region is a highly significant archaeological landscape in Namibia (**Figure 3**) whose resources represent irreplaceable evidence of global importance. Its archaeological record is reported to have evidence of human occupation dating during the Pleistocene and Holocene periods, roughly in the last 800 000 years to 2000 BP (Kinahan, 2012). Such evidences are reflected in materials records such as surface scatters of stone artefacts, rock shelters with evidence of occupation, including rock art, graves, stone features such as hunting blinds and huts, and more recent sites such as colonial battlefields, old road-works and historical mines. These material cultures demonstrate evidence of significant human evolutionary and technological advancements as well as their incredible adaptations to extreme aridity and environmental uncertainty of central Namib attributed mainly to the hunter-gatherers and nomadic pastoralists, and their interaction with early European trading missions (Kinahan 2012).

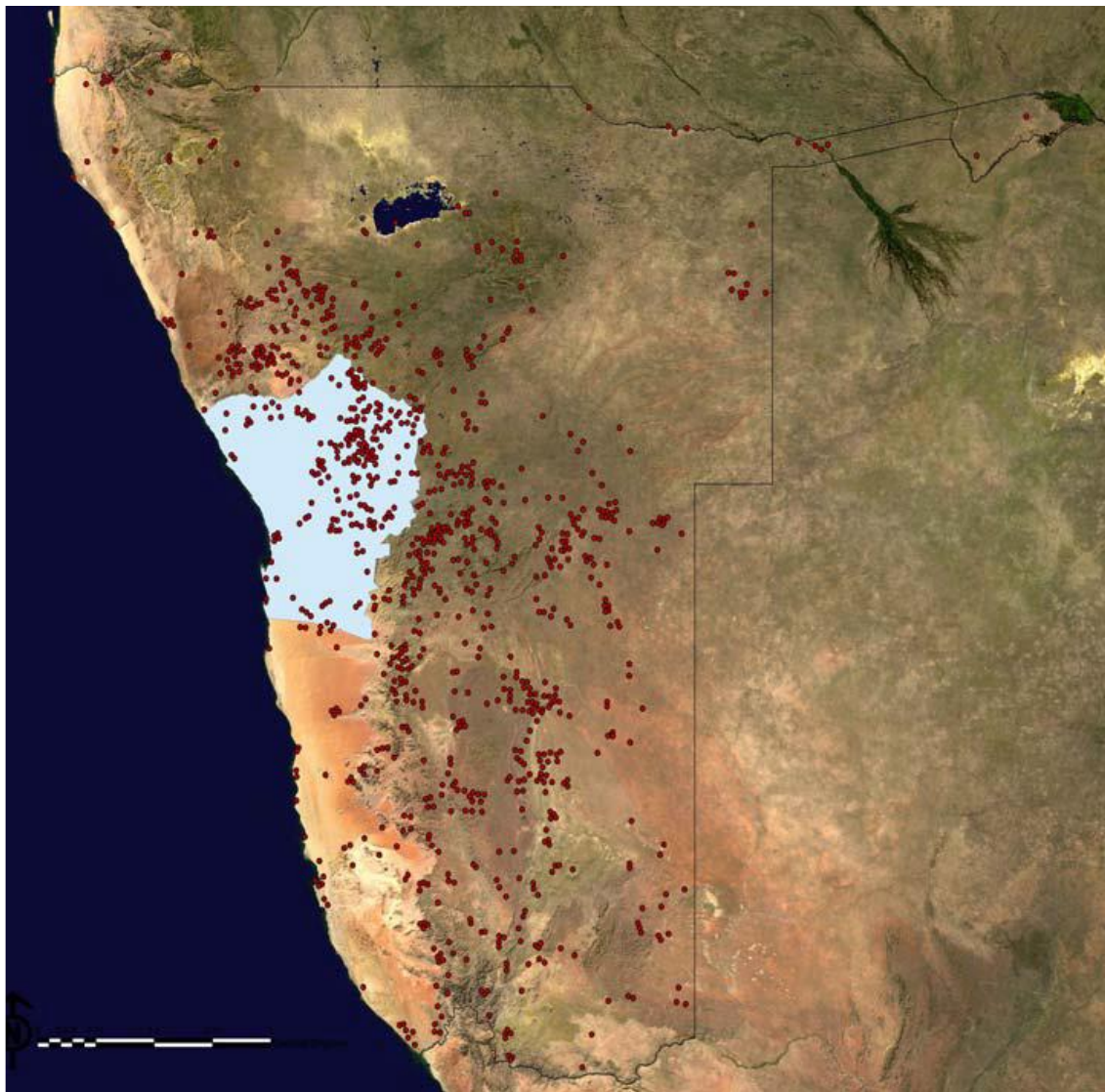


Figure 3: General distribution of archaeological sites in Erongo region (blue) in relation to sites in Namibia. Credits: (John Kinahan, 2012).

The coverage and wealth of this archaeological and historical materials record have been considerably recorded over the last decades, through various reconnaissance and detailed archaeological assessments conducted as a result of exploration and mining operations, and generally by the infrastructure related development required by these operations.

6. Localised Area

The area surrounding Otjimbingwe is not well explored archaeologically. Recent investigations by Kinahan (2017) in relations to Archaeological Impact Assessment studies in ML 190 between Karibib and Otjimbingwe, drew attention to the presence of pre-colonial records linked to Khoe Pastoral evidences from the area, and more spectacularly, observations on ceramic vessels from Habis. Additionally, previous investigations has also documented colonial history associated with trading outlets and copper mining, series of forts and missionary activities by early European

settlers (Schnee 1920; Peters 1981; Dupisani 1985 and Kinahan 2017). The pre-colonial record suggests that the Pastoral Herero's whose substance living is based on livestock farming with a semi-nomadic lifestyle inhabited the area near Otjimbingwe.

With the onset of the Europeans in the early 19th Century, the active Rhenish mission society under Johannes Rath established a second missionary station for the Herero at Otjimbingwe in 1849 (Dupisani 1985). The missionaries at a time were reportedly militarily violent. The station became an early site of European settlement in the 1850s after copper was discovered in the area. The owner of the Matchless Copper Mine, Charles John Andersson, built a series of forts and defensive tower with cannons at Otjimbingwe. The built defensive tower (**Figure 4**) that was created by the mission in 1872 around Otjimbingwe was designated as a protected monument in its first year of activity in 1950 and it was restored in 1993 by the National Monuments Council (Dierks 2012). After Andersson sold his properties to the Rhenish Missionary Society in the 1860s, the German missionaries contributed to the escalation of internal violence during the 1860s by selling weapons and arming the pastoral Herero for their 'war of liberation' in 1863 against domination by Khoikhoi Orlam groups/Nama (Andersson 1987–1989, vol. 2, 236–48).



Figure 4: The Ruin of the "Kurt von Francois Fortress" on the Road from Otjimbingwe via Tsaobis. Credits: (Dierks, 2004).

Today, it is what has become known as the battle of *Otjimbingwe*. According to (Dierks 2012) in 1866 a teacher training college was established in Otjimbingwe with Namibia's oldest church constructed in 1867 (**Figure 5**). It was proclaimed as a national monument in 1974 under the 1967 National Monument Act. In the 1880s Otjimbingwe became the seat of the German colonial government and by 1888, a post office was opened in the town. With this background, likely, archaeological resources dating from the pre-colonial era and the colonial era in the form of historic structures, ruins, graves and relics of the wars and missionary settlements within the vicinity of Otjimbingwe is likely to be found.

Although some of these structures are abandoned and or most likely vanished, few traces of their foundations could be recognised. Thus it is safe to assume that such historic resources might be found in EPL 8020, which is located 30 km to the North

West from Otjimbingwe. This is in addition to late Holocene archaeological sites recorded in the nearest surveyed area ML 190 by Kinahan (2017) which is 15 kilometers north of Otjimbingwe *rf.* QRS 173. Such important find suggests that there area might have potential sensitive archaeological resources that are yet to be discovered. If they do exists, such site may yield traces of pre-colonial occupations attributed to Khoi Pastoralists, early colonial activities between Karibib and Otjimbingwe related to mining and missionary activities (**Figure 6**).



Figure 5: Rhenish missionary church in Otjimbingwe. Photo credits: Wikipedia

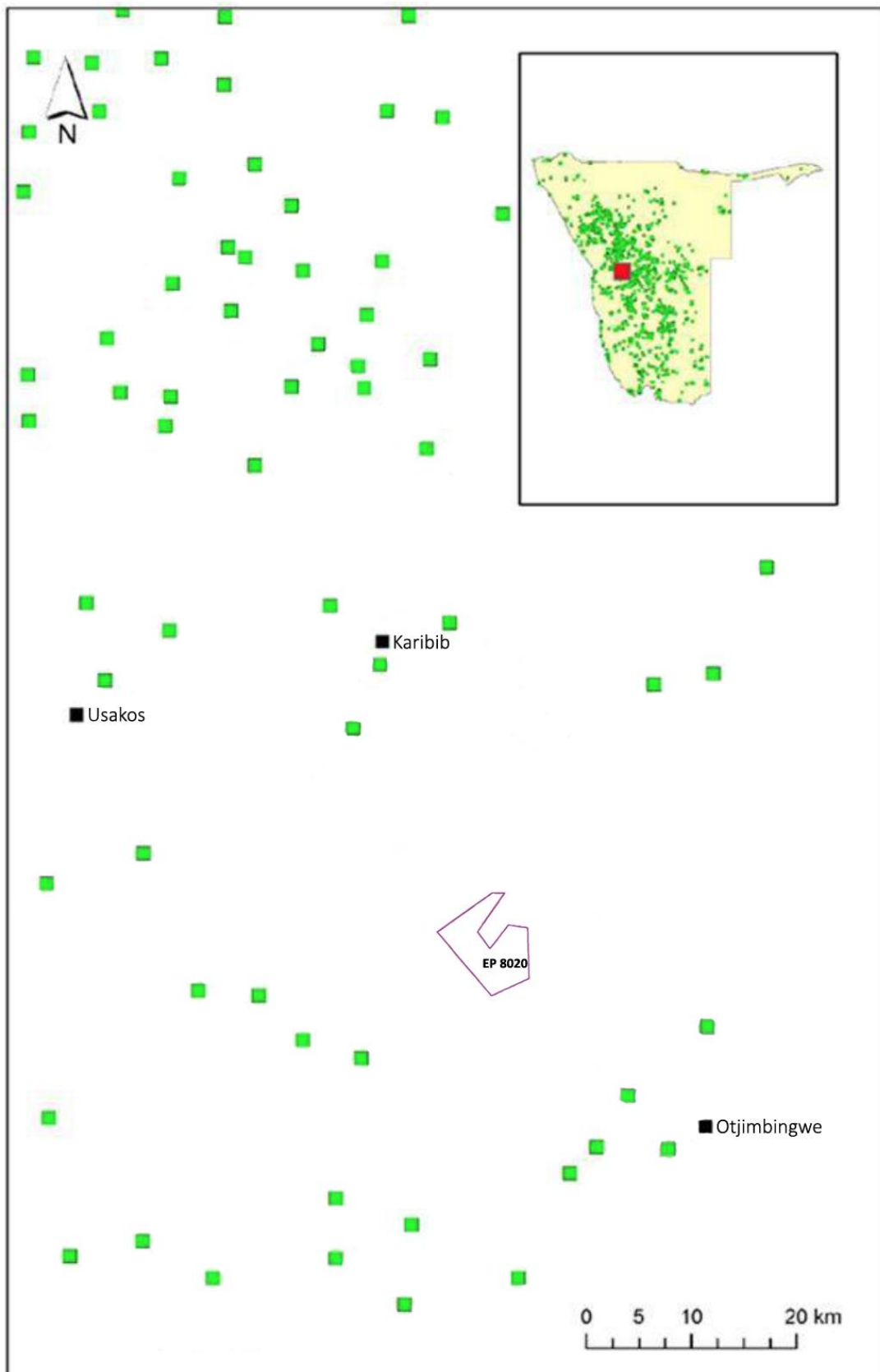


Figure 6: An edited map for the distribution of significant archaeological sites in Central Namibia reference to EPL 8020. Credits: (John Kinahan, 2017).

7. Impact Assessment results

This desktop archaeological impact assessment study within EPL 8020 has not located any heritage resources within and immediate surrounding of the EPL 8020 boundaries. The only nearest heritage resources (historic and archaeological) are approximately 15- 30km away from EPL 8020. Of the significant are those recorded at Otjimbingwe south east and west of the EPL 8020 and clusters of pre-colonial records linked to Khoe Pastoral evidences (QRS 120 and QRS 173) in relations to ML 190 (Kinahan 2017).

However, since no field survey (surface of sub-surface) examinations were ever carried out in the EPL 8020 and immediate surrounding areas, probable existence of archaeological resources (from early Holocene to the last 50 years) and historic resources cannot be precluded altogether, therefore, should they exist; they will be in primary contexts as the area has never been investigated archaeologically. Contrary, due to the slight disturbances from previous and on-going explorations and mining activities over the last decade, it is possible that some heritage resources (if any) will likely be found and these are to be expected be in secondary depositions. Therefore, in the unlikely event that they do occurs during explorations, and no field assessment is carried out, it is expected that the resources will be damaged and the magnitude of this impact would be high. Such resources will likely be of high heritage significances. The expected damage will be irreversible, at a local and regional spatial levels. The consequence of the impact would be localized. Consequently, the devised management plan including the Chance Finds should inform the proponent on actions to be taken. Therefore, until a detailed field assessment is carried out, this desktop study cannot be interpreted as sufficient enough to confidently warrant the project commencement.

8. Management recommendations

The proponent is advised to implement the following management actions on the way forward:

1. A detailed field survey within the EPL 8020 must be carried out to establish if there are possible significant cultural and heritage features within and beyond the EPL;
2. If heritage resources occurs, a landscape approach of the project site must consider culture and heritage features in the overall planning of the project infrastructures management within and beyond the EPL boundaries;
3. The proponent is advised to make an application to the National Heritage Council for a Consent to allow field assessment of the area in relation to the proposed exploration activities.
4. The proponent should engage an archaeologist to survey the area in advance before the issuing of clearance for the explorations to proceed; and

5. For purposes of this EPL 8020 project, the client and contractors should be made aware of the provisions of Section 55 (4) of the National Heritage Act 2004. It sets out requirements that any heritage objects or human remains discovered in the course of explorations and related work should be reported to the contracted Archaeologist and thereafter, National Heritage Council as soon as possible. The following standardized archaeological “Chance Finds Procedure” should be adopted and implemented throughout the explorations period.
6. Chance Finds Procedure (CFP) management guideline:

EPL 8020 is an important mining infrastructure development area subject to heritage & archaeological assessment at the planning stage. These assessments were desktop-based, therefore; significant subsurface heritage resources might be discovered. Onsite personnel and contractors must be sensitized to recognize “chance finds heritage” in the course of their work. The procedure set out here covers the reporting and management of such finds. The CFP covers the actions to be taken from the discovery of a heritage site or object to its investigation and assessment by a trained archaeologist. The CFP is intended to ensure compliance with the relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “a person who discover any archaeological objects must as soon as possible report the discovery to the council”. The procedure of reporting set out below must be observed so that heritage materials are reported to the authorities.

A. Responsibilities:

Operator To exercise due caution if archaeological remains are found

Foreman To secure site and advise management timeously

Superintendent To determine safe working boundary and request inspection

Archaeologist To inspect, identify, advice management, and recovers remain

B. Procedure:

Action by the person (operator) identifying archaeological or heritage material

- If operating machinery or equipment: **stop work**
- Identify the site with flag tape
- Determine GPS position if possible
- Report findings to foreman

C. Action by foreman:

- Report findings, site location and actions are taken to the superintendent
- Cease any works in the immediate vicinity

D. Action by superintendent

- Visit the site and determine whether work can proceed without

damage to findings;

- Determine and mark the exclusion boundary
- Site location and details to be added to the Archaeological Heritage database system

E. Action by archaeologist

- Inspect site and confirm the addition to AH database system;
- Advise National Heritage Council and request a permit to remove findings;
- Recovery, packaging and labeling of findings for transfer to National Museum

F. In the event of discovering human remains

- Actions as above;
- Field inspection by archaeologist to confirm that remains are human;
- Advise and liaise with NHC Guidelines; and
- Recovery of remains and removal to National Museum or National Forensic Laboratory, or as directed.

9. Conclusion

This project for rare metals, dimension stones, industrial minerals, and precious metals, on EPL 8020 will not directly affect any reported herein heritage & archaeological resources based on the desktop study and assessment undertaken. The footprint of the dimension stone exploration activities largely covers EPL8020 and its immediate vicinity, an area needs to be subjected to a field assessment prior to explorations for possible pre-colonial settlement reported in the area between Karibib and Otjimbingwe. The impacts of the proposed development will be manageable if such field assessment devises a management plan of possible heritage resources together with the chance finds procedure (CFP) recommended herein.

I hereby kindly request your good office to provide the proponent with a National Heritage Council (NHC) consent letter to enable a field assessment to be carried out before the issuance of the Environmental Clearance Certificate by the Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (MEFT: DEA) so that the project can commence.



Eliot S Mowa, (Archaeologist)

Member: Association of Southern African Professional Archaeologists (ASAPA)

10. References

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