

APPENDIX E –

**APPLICATION FOR CONSENT FROM THE
NATIONAL HERITAGE COUNCIL,**

**HERITAGE/ ARCHAEOLOGICAL IMPACT
SPECIALIST REPORT**

AND

**CONSENT LETTER FROM THE NATIONAL
HERITAGE COUNCIL**



National Heritage Council of Namibia

52 Robert Mugabe Avenue • Private Bag 12043, Ausspannplatz • Windhoek, Namibia
Tel: (061) 244 375 • Fax: (061) 246 872 • E-mail: simon@gmail.com

**DEPARTMENT: FINANCE, HUMAN
RESOURCES & ADMINISTRATION**

Enquiries: S. Enkali

10 March 2021

INVOICE

Omavi Geo Technical & Geo Environmental
Att: Mr Zondi Shipnata & Michael Cai
P O Box 81549
Windhoek
Tel: +264 81 4786 303

<p>Application for EA Consent- Permit for Omavi Geo Technical & Geo Environmental, for the EPLs No 6217-71684, Uis, Overlies farm District, Erongo Region.</p> <p>❖ Application Fees: 1 @ 150</p> <p>1. Application Fees -non refundable</p> <p>Thanks for your co-operation! Fax deposit slip to: 061 -246872, Att: Mr S. Enkali E-mail: senkali101@gmail.com/finance@nhc-nam.org</p> <p>Kindly Pay this Invoice as soon as possible.</p> <p>Use the Invoice number as the reference, when you make payment!</p>	<p>NS 150.00</p> <p>This already paid through the Bank (see attachment)</p>
<p>Total</p>	<p>NS 150.00</p>

Bank details: National Heritage Council, Standard Bank, Acc: 589057014;
Branch Code: 082672, **Saving Account, Swift Code:** SBNMNX, Ausspannplatz, Windhoek

PAID.....!



Council Members: Dr. Rosa M Persend (Chairperson), Mrs. Natalia Agagoses (Deputy Chairperson), Ms. Sanel Steenkamp (Executive Director), Mrs. Magdalena Martinussen (Treasurer), Mr. Herbert Karapo, Mr. Erhard Rokin, Dr. Heriberto Kariseb, Ms. Elizabeth Brown, Mr. Moses Moses, Ms. Helcke Moke.



National Heritage Council of Namibia
7173 Lazarette House • Private Bag 12043, Ausspannplatz • Windhoek, Namibia
(061) 244 375 • Fax: (061) 246 872 • E-mail: erica@nhc-nam.org

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 FOR EPL 6217

1. Name and address of applicant

Zondi Shipnata AND Michael Cai
P.O. Box 81549
WINDHOEK, NAMIBIA

2. Full name and designation of the person in charge of undertaking the works or activities:
Michael Cai (Financial & Technical partner)
E. project undertaker

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

Michael Cai
- This scope of work will be undertaken
in-house

4. Academic qualifications, skills, occupation and competencies of the person in charge mentioned under A2 above.

DIMENSION STONE EXPLORATION, QUARRYING,
AND PROCESSING EXPERIENCE

M.C

5. Previous permits issued in Namibia:

NO HERITAGE RELATED PERMIT ISSUED FOR THIS LICENSE
BEFORE

6. Period for which permit is required: From:

to MARCH 2024

MARCH 2021

7. Date by which permit is required:

By mid April 2021

B. EXPORT AND TRANSPORTATION

8. Indicate whether this is an Application for:

Temporary Export Permanent Export Local Transportation

9. Name and address of Namibian institutions, if any, presently housing the protected place or protected object:

10. Name and address of local or foreign institution, if any, to which the protected place or protected object will be exported:

11. Description of the protected place or the protected object to be exported or transported. Indicate the number of items and, if applicable, the accession numbers given by the Namibian institution, if any, from which the place or object is on loan:

12. Description of the site (cave, rock shelter, grave, structure, midden, open surface site etc.) or geological formation from which the protected place or protected object originates:

13. Geographic location (farm, village, settlement, town, region, magisterial district, constituency, Global Positioning System coordinates) of the protected place or protected object:

14. Reason for transportation of the protected place or protected object (identification, exhibition etc.):

M.C

C: 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:

- 8 km NE of UIS
- OVERLIES FARM # NUDANAM, ISISEB AND OTSIMBOYO CONSERVANCY

20 Government Gazette 1 September 2005 No. 3490

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.)

EXPLORATION CORE DRILLING; CUTTING OUT OF SAMPLE BLOCKS BY BUTTERFLY CUTTING; OVERBURDEN STRIPPING; STOCKPILING OF TOPSOIL;

D: UNDERTAKING BY APPLICANT

17. I Michael CAI (the person in charge of undertaking the works or activities) and (where applicable) being head of the DIRECTOR (TECHNICAL & FINANCE PARTNER) institute, hereby undertake to strictly observe the terms and conditions under which the National Heritage Council may issue the permit.

Signature M Cai dated 09/03/2021

18. I _____ the person in charge of _____ Institute where the protected place or protected object to be exported or transported is currently housed, do hereby state that I support / do not support the application. (Note: Please strike out the statement, which is not applicable to this declaration) (If applicable for purposes of the application.)

Signature _____ dated _____

19. I _____ the person in charge of _____

The _____ institute to which the protected place or protected object will be exported do hereby undertake that the protected place or protected object will be returned to Namibia during the period indicated in point A6 above. (If applicable for purposes of the application.)

Signature _____ dated _____

Permit No.
(Consecutive number & year of issue)

M.C

**PHASE 1 ARCHAEOLOGICAL AND CULTURAL IMPACT
ASSESSMENT REPORT FOR PROPOSED EXPLORATION
ACTIVITIES OF DIMENSION STONE AND INDUSTRIAL
MINERALS ON EXCLUSIVE PROSPECTING LICENCE (EPL) 6217
DAURES CONSTITUENCY IN ERONGO REGION, NAMIBIA.**

Compiled by

Henry Nakale [BA HONS (GZU), BA HONS (UP), MSocSCI (UP)]
Henry Chiwaura [BA GEN (UZ), PGDHC (UON), MA [UZ]]

Compiled for:

Omavi Geo - technical and Geo-Environmental Consultants

Tel: +264818264867

Email: infor@omavi.com.na

Item	Description
Proposed development and location	Zondi Shipuata and the JTD Mining Group is proposing to carry out exploration activities such as geological mapping, rotary core and Reserve circulation drilling and test/pilot quarrying where high quality rocks are encountered for suitable natural rocks (e.g., granite, pegmatites, dolerite, quartz wacke, greywacke and possibly marble for the production of dimension stone and industrial minerals on EPL 6217. EPL 6217 is located about 8km north east of the small town Uis in the Daures Constituency, Erongo Region, Namibia and measures approximately 18 834 Hectares (Ha).
Title	Proposed Exploration activities of Dimension Stone and Industrial Minerals on Exclusive Prospecting Licence (EPL) 6217 Daures Constituency in Erongo Region, Namibia: Archaeological and Heritage Impact Assessment Report
Purpose of the study	The purpose of this document is an Archaeological and Heritage Impact Assessment report that describes the cultural values and heritage factors that may be impacted on by the proposed exploration activities
Coordinates	21 ⁰ 5'05" S and 14 ⁰ 57'24" E
Municipalities	Uis, Erongo Region
Predominant land use of surrounding area	Mining and farming
Developer	Zondi Shipuata and the JTD Mining Group
Heritage Consultant	Henry Nakale & Henry Chiwaura
Date of Report	06 March 2021
Contact person	Henry Nakale +264816680633
Author(s) identification	Henry Nakale, Henry Chiwaura (Archaeologists and Heritage specialist)
Project Number	003

Copyright

Authorship: This A/HIA Report has been prepared by Messers Henry Nakale, Henry Chiwaura and (Professional Archaeologist). The report is for the review of the National Heritage Council of Namibia.

Copyright: This report and the information it contains is subject to copyright and may not be copied in whole or part without written consent of the authors.

This report can however be reproduced by IDT and The National Heritage Council of Namibia for the purposes of the Archaeological and Heritage Management in accordance with the National Heritage Act, 27 of 2004

Geographic Co-ordinate Information: Geographic co-ordinates in this report were obtained using a hand-held Garmin Global Positioning System device. The manufacturer states that these devices are accurate to within +/- 5 m.

Maps: Maps included in this report use data extracted from the NTS Map and Google Earth Pro.

Disclaimer: The Authors are not responsible for omissions and inconsistencies that may result from information not available at the time this report was prepared.

The Archaeological and Heritage Impact Assessment Study was carried out within the context of tangible and intangible cultural heritage resources as defined by the National Heritage Council Regulations and Guidelines as to the authorisation of proposed exploration project being proposed by Zondi Shipuata and the JTD Mining Group.

Signed by



Acknowledgement

The authors acknowledge Omavi Geotechnical and Geo-Environmental Consultants for their assistance with project information as well as responding to technical queries related to the project.

TABLE OF CONTENTS

	Page
Executive Summary.....	1
Abbreviations.....	3
1.0 Introduction.....	4
2.0. Site Description and Location.....	5
2.1 Scope of the Proposed Project.....	8
3.0. Legal Framework	9
4.0. Methodology	10
5.0 Brief heritage setting of the project area.....	12
6.0. Fieldwork Findings	13
7.0 Results of Desktop Research.....	16
8.0 Conclusions and Recommendations	17

LIST OF TABLES

Table 1 Field survey results.....	13
Table 2 National Monuments recorded in National Database	18

LIST OF PHOTOGRAPHS (FIGURES)

Figure 1 Locality map.

Figure 2 Google earth map showing mountain outcrops of granite and dolerite on EPL 6217.

Figure 3 Granite Hill with dolerite dykes in relation to local landscape setting.

Figure 4 Public Consultation Meeting.

Figure 5 Part of the surveyed landscape.

Figure 6 Map showing the project boundaries and areas prioritized during filed survey.

Figure 7 Rock panel with Rock Paintings.

Figure 8 Cave shelter.

Figure 9 Historical building (former chief's homestead).

EXECUTIVE SUMMARY

This Archaeological and Heritage Impact Assessment (AIA/HIA) Report has been prepared to address requirements of the National Heritage Act 27 of 2004. The study was commissioned by **Omavi Geotechnical and Geo-Environmental Consultants** to conduct this Archaeological and Heritage Impact Assessment (AIA/HIA) Study for the proposed exploration. The proposed development is located in the Daures Constituency in Erongo region. This report includes an impact study on potential archaeological and cultural heritage resources that may be associated with the proposed exploration activities. This study was conducted as part of the specialist input for the Environmental Impact Assessment exercise. The proposed development consists of exploration of Dimension stones in Daures Constituency in Erongo Region. The project information has been passed to research team by the OMAVI project engineers. Analysis of the archaeological, cultural heritage, environmental and historic contexts of the study area predicted that archaeological sites, cultural heritage sites, burial grounds or isolated artefacts were likely to be present on the affected landscape. The field survey was conducted to test this proposition and verify this prediction within the proposed development site. The general project area is predominantly residential, agriculture (livestock rearing) and mining.

The report makes the following observations:

- The findings of this report have been informed by desktop data review, field survey and impact assessment reporting which include recommendations to guide heritage authorities in making decisions with regards to the proposed project.
- Most sections of the project area are very accessible and the field survey was effective enough to cover all sections of the project receiving environs. However, some small portions of the proposed EPL development site had limited access because of the rugged terrain cover.
- The immediate project area is predominantly mining, agricultural (grazing), conservancy and residential areas.
- Some sections of the proposed development site are severely degraded by mining and environmental clearance from agriculture.

- The study recorded four heritage sites within the proposed exploration development site.

The report sets out the potential impacts of the proposed development on heritage matters and recommends appropriate safeguard and mitigation measures that are designed to reduce the impacts where appropriate. The Report makes the following recommendations:

- ❖ The prospecting/mining teams must be inducted on the possibility of encountering archaeological resources that may be accidentally exposed during subsurface exploration prior to commencement of work on the site in order to ensure appropriate mitigation measures and that course of action is afforded to any chance finds.
- ❖ If archaeological materials are uncovered, work should cease immediately and the National Heritage Council (NHC) be notified and activity should not resume until appropriate management provisions are in place.
- ❖ The findings of this report, with approval of the NHC, may be classified as accessible to any interested and affected parties within the limits of the legislations.

This report concludes that the impacts of the proposed project of the cultural environmental values are not likely to be significant on the entire EPL site if the Chance Find Procedures (CFP) are followed including recommended safeguard and mitigation measures identified in this report.

ABBREVIATIONS

AIA	Archaeological Impact Assessment
CFP	Chance Find Procedure
ECO	Environmental Control Officer
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EM	Environmental Manager
EMP	Environmental Management Plan
HIA	Heritage Impact Assessment
LA	Local Authority
LIA	Late Iron Age
NHA	Nation Heritage Act, Act 27 of 2004
SM	Site Manager
NHCN	National Heritage Council of Namibia
NMN	National Museum of Namibia

1.0 Introduction

Zondi Shipuata and the JTD Mining Group (the proponents) has appointed OMAVI Geotechnical & Geo-Environmental Consultants to conduct an Environmental Scoping Assessment (ESA) and apply for the Environmental Clearance Certificate (ECC) to the Competent Authority in accordance with the Environmental Management Act (EMA) No. 7 of 2007 and its 2012 EIA Regulations. OMAVI in turn requested archaeologists to conduct Cultural and Archaeological Impact Assessment (AIA) at the Exclusive Prospecting Licence (EPL) 6217 in the Daures Constituency, Erongo Region. The EPL is situated about 8km northeast of Uis and overlies the Tsiseb and Otjimboyo communal conservancies. The proponent is proposing to carry out exploration activities such as geological mapping, rotary core and reserve circulation drilling and test/pilot quarrying where high quality rocks are encountered for suitable natural rocks (e.g., granite, pegmatites, dolerite, quartz wacke, greywacke and possibly marble for the production of dimension stone and industrial minerals on EPL 6217.

Due to the destructive tendency of such exploration activities, which may include earth moving/ land alteration operations, it was a pre-requisite to conduct an Archaeological and/ or Heritage Impact Assessment (AIA) as obligated by the National Heritage Act, Act No. 27 of 2004 and, in part, by the Environmental Management Act, Act No. 7 of 2007. The main thrust of the provisions of the aforementioned legislations is to protect and salvage cultural/ archaeological and environmental resources from potential destruction resulting from developmental activities. It was against this background that an Archaeological Impact Assessment (AIA) was carried out on EPL 6217 to fulfill the following objectives:

- a) To identify and document cultural/ archaeological materials and sites occurring in the area proposed EPL,
- b) To assess the nature and scale of archaeological impact of the proposed exploration activities to heritage resources,

- c) To suggest some conservation strategies for the cultural heritage resources that might occur in the area proposed for exploration which can be potentially destroyed in the course of detailed exploration.

2.0 Site Description and Location

EPL 6217 is located about 8km north east of the small town Uis in the Daures Constituency, Erongo Region, Namibia at the approximate coordinates 21°5'05" S and 14°57'24" E, and measures approximately 18 834 Hectares (Ha) in real size. The EPL partly overlays the Tsiseb and Otjimboyo/Otjihorongo conservancies as shown in Figure 1 below. Having a combination of the Nama karoo, Namib desert and the Tree and shrub savanna biomes the area consist of sandy soil with mild gravel plains and scattered mountain outcrops of granite and dolerite. Key observations include sparsely distributed vegetation. With better rainfall compared to previous years the herbaceous cover is fairly good. Dominant species observed are part of the Fabaceae, Burseraceae, Eurphorbiaceae and the Capparaceae family. Geologically, scattered hills outcrops of granite and dolerite are found on EPL 6217 and this type of landscape setting has been “known to host a wealth of archaeological resource” (Nankela 2019).

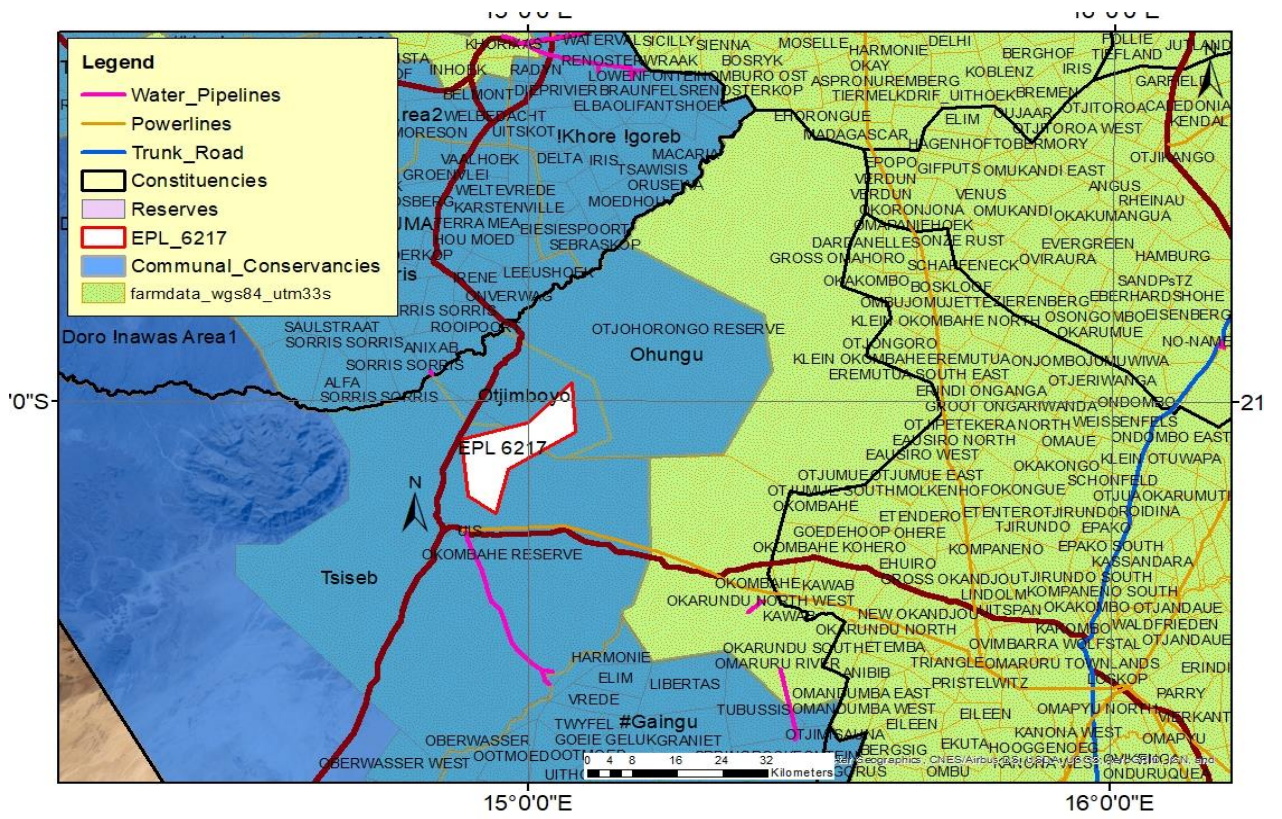


Figure 1; Locality map. Photo credit: Omavi 2021

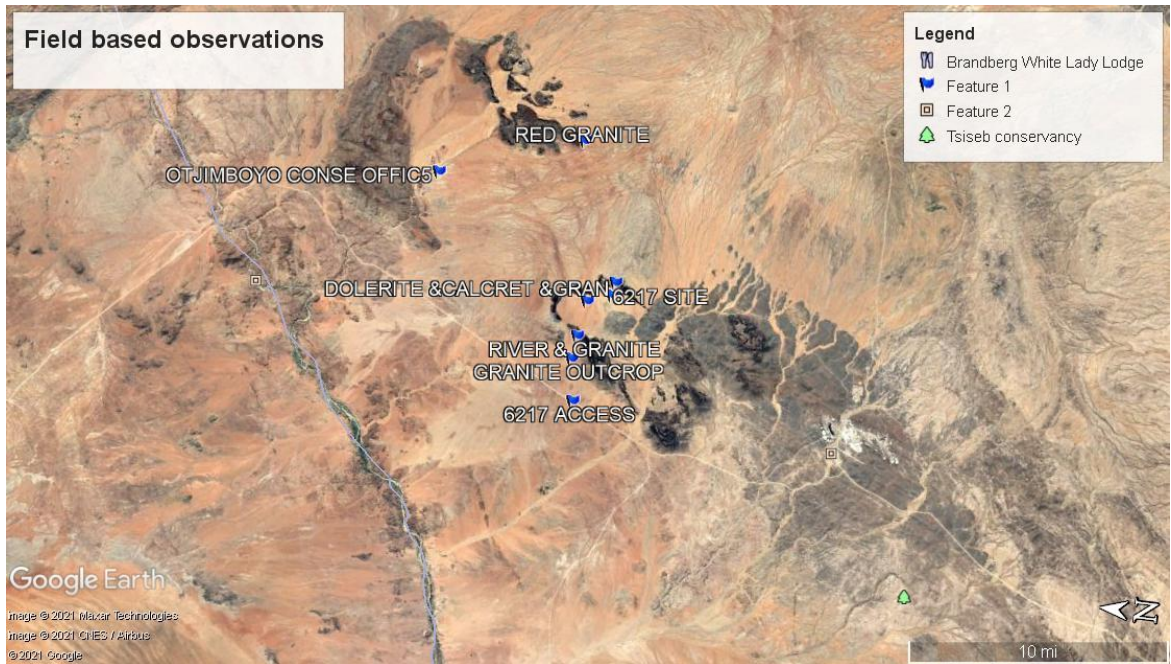


Figure 2; Google earth map showing mountain outcrops of granite and dolerite on EPL 6217. Photo credit: Omavi 2021



Figure 3; Granite Hill with dolerite dykes in relation to local landscape setting. Photo credit: Omavi 2021

2.1. Scope of the Proposed Project

The property, which is the subject of this assessment, is registered under the name of Zondi Ismael Shipuata and the JTD Mining Group. The property covers an area of approximately 18 834 Hectares (Ha). Zondi Ismael Shipuata and the JTD Mining Group proposes to develop the area into a project that is meant for the prospecting/ exploration of suitable rocks that can be quarried for purposes of producing dimension stone and industrial minerals (specifically for crushing purposes to produce construction aggregates, and possibly other industrial minerals such as graphite, fluorite, Phosphates, titanium minerals associated with alkaline rock complexes and carbonate rocks):

- **Detailed exploration** Vertical and inclined core drilling with a DTH (down the hole) drill rig will be carried out in selected areas, to provide information on the vertical extent of the formation, as well as the colours, textures and joint spacing

or possible defects at depth. Where cleaning of the rock units is required, a bulldozer will be used to scrap off overburden, after which an air compressor will be used to further expose the rocks for mapping. This will aid delineation of major geological structures such as fault and shear zones, the extent of veins, frequencies of fracture/ discontinuity, thereby refining the produced geological map. The refined map will then be used to define targets for feasibility or test quarrying.

- **Feasibility study** Where drilling yields positive results, test quarrying by means of butterfly cutting will be conducted to fully evaluate the recovery of saleable blocks, and better optimize the extraction methods, production rates and operational costs. This will be carried out in selected areas only and shall be performed on as small an area as possible to minimize environmental impacts. Project feasibility will also be measured in terms of accessibility from site of occurrence to nearby relevant infrastructure such as roads, railway, water infrastructure, power infrastructure, etc.

3.0 Legal Framework

In most cases where the aspect of construction, exploration or mining is involved, cultural and/ or archaeological evidence located within areas earmarked for development usually face the danger of either complete erasure or destruction. Such a risk is so high especially in areas that had not been built or mined before as the construction work will involve earth moving activities which will in turn destroy environmental resources as well as archaeological and/or cultural resources that might occur within the project area. In order to ensure that this unique heritage of our past is protected and well documented, the National Heritage Act 27 of 2004 and EIA Terms of Reference in relation to the assessment of impacts of the proposed development on the cultural and heritage resources associated with the receiving environment shall be used to guide the exploration exercise. The statutory mandate of heritage impact assessment studies is to encourage and facilitate the protection and conservation of archaeological and cultural heritage sites, in accordance with the provisions of the National Heritage Act, Act 27 of 2004 and auxiliary regulations.

The legislations require that when constructing or mining a linear development exceeding 300m in length or developing an area exceeding 5000 m² in extent, the developer must notify the responsible heritage authority of the proposed development and they in turn must indicate within 14 days whether an impact assessment is required.

4.0 Methodology

Methodologically, primary data for the AIA was collected from the National Heritage Council of Namibia. A stratified systematic survey was conducted in areas which are accessible and with good archaeological visibility, where individuals were walking parallel to each other, and spaced by 5 meters. However, in areas with rugged terrains, a stratified random survey was conducted, where attention was given to areas with archaeological potential (Figure 6). Secondary data was obtained from relevant literary sources, both published and unpublished. Significant information (predominantly unpublished) was mainly obtained from National Heritage Council of Namibia (NHC) and the National Museum of Namibia, these included field reports, national database, marked topographical maps (1:50,000), data recorded on site index cards and graphic information.



Figure 4; Public consultation meeting. Photo credits: Nakale 2021



Figure 5; Part of the surveyed landscape. Photo credits: Nakale 2021

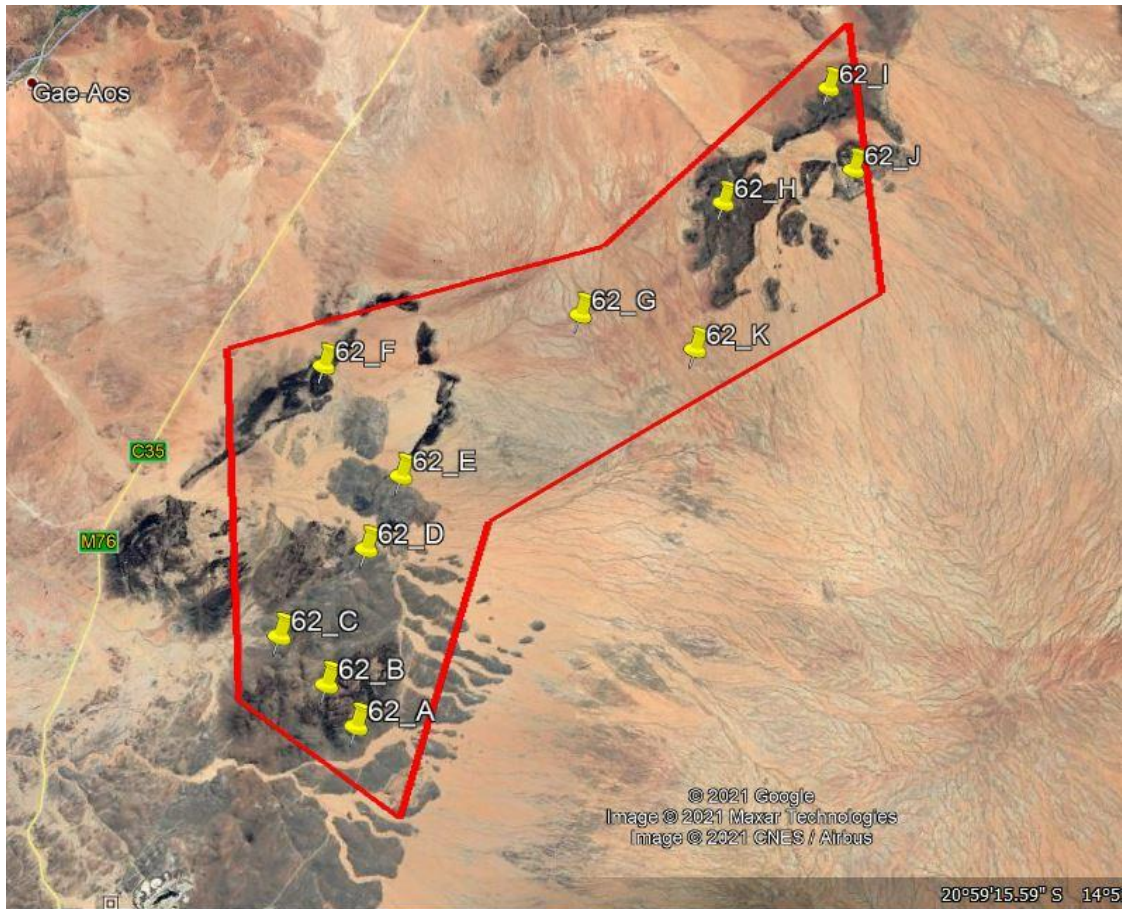


Figure 6; Map showing the project boundaries and areas prioritized during field survey. Photo credits: Omavi 2021

5. 0 Brief heritage setting of the Project Area

Stone Age archaeology is prevalent in the larger geographical area. No systematic research has been carried out in the area project area. Kinahan has carried out a comparative research on rock painting shelters in Erongo region from ‘Snake Rock’ in Hungorob Gorge – Brandberg Mountain, ‘Bushman Paradise’ in Pondok Mountain – Spitzkoppe Mountain and at “Rainman Shelter” in Upper Otjohorong Granite Hill in 1998 (Nankela, 2020). About 150 sites were recorded. The region is also endowed with Iron Age and contemporary heritage that has to be ascertained at a later date. Erongo region has 37 heritage sites which are listed as national monuments.

6.0 Fieldwork Findings

Field survey involved an intensive examination of the general landscape. The conventional criterion for physical setting of cultural affinities – that is, general field observations, description of diagnostics features, photographs, locations and other associated heritage objects were applied. It is important to point out that no sub-surface or in situ archaeological features were recorded during this study and it cannot be ruled that they are not in existence either since part of EPL 6217 lays in the Otjohorongo conservancy which is known to be rich in archaeological sites and with a few reported cases of systematic disturbances and possible damages to archaeological heritage landscapes as a result of Dimension Stone Mining operations. It is therefore possible that buried archaeological remains are likely to be exposed during mining phases and in these scenarios, permanent loss of heritage is inevitable. Interviews with communities in Tsiseb and Otjimboyo farms were also carried out. After the community’s engagements, this study established that there were no archaeological, paleontological and historic sites of significance on the footprints of EPL 6217. Consultation meeting was held on the 20th of February 2021 at farm Nudanab.

Results (Table 1)

Heritage resource	Status/Findings	Level of impact by explorations
Buildings, structures, places and equipment of cultural significance	homestead of former chief of the area, Chief Thaniseb	Low
Areas to which oral traditions are attached or which are associated with intangible heritage	None survives in the proposed area	None
Historical building	Chiefs House	To be used by relatives
Landscapes and natural features of cultural significance.	None	None

Archaeological and paleontological sites	Rock Paintings	None
Graves and burial grounds	'Grave' Stone	Low
Movable objects	None found in the area	None

Detailed Finds

Site 1 Rock Paintings (493778.07 m E and 7663549.63 m S)



Figure 7; Rock panel with rock paintings. Photo credits: Nakale 2021

Three figures, a giraffe, 2 human figures all facing east. The paintings are fading with lots of water runoff. The Giraffe is in fair condition. Rock type is grey and quartz wacke. The rock art site is within the license area (prospecting area). The nearest mountain targeted with dolerite and granite is approximately 4 km away from the Rock Art site.

Site 2 Rock caves Habitation shelter, 4 caves with one being big and three small ones. There is evidence of use of fire probable site for cattle herders. The caves are approximately 8 meters from the Rock paintings and 3 to 4km from the targeted rocks.

Site 3 Grave Stone (503555.55 m E/ 7676572.52 m S)

Undated grave but not confirmed by the elders in the area.

Site 4 Chief Thaniseb homestead (former chief of the area). The first Chief lived in this house as from 1978. A historical building not far away from the project is 500metres. The house is currently abandoned but the chief's descendants are planning to move back. The chief passed away in 2017.



Figure 8; Cave shelter. Photo credits: Nakale 2021



Figure 9; Historical building (former Chief's homestead). Photo credit: Nakale 2021

7.0 Results of Desktop Research

Information from the NHC shows that the project area falls under the cultural landscape occurring in Erongo Region. The national monuments list has 37 national monuments recorded within Erongo Region. Environmental Impact Assessment (EIA) April, 2020: final scoping report for the construction of Elephant Ridge Camp in Otjimboyo Conservancy, Erongo region (Namibia) observed one rock art site at Latitude -20.921860, Longitude 14.913325 the painting was recorded and reported to the NHC in 2020. Table 2 shows details of the part of the national monuments occurring in the same region as the project and are recorded in the National Monuments Register.

Table 2. National Monuments Recorded in National Database

Site Name	Information on Site Index Card
Ameib	`Phillipp's Cave' with rock art drawings.
Badges 158 Farm	Regimental badges laid out in stone of 2 Durban Light Infantry, dating from 1915
Brandberg.	Area of 450km ² of archaeological, ecological and geomorphological importance
Bushman Paradise Cave	Was `one of the finest collections of rock art in Namibia'. (Spitzkoppe
Cape Cross	Replica (1895) of original stone pillar left by Diogo Cão in 1484. First European contact with Namibia.
Erongo Farm	Rock paintings at six sites
Karibib	Rösemann building façade, erected in 1900
Karibib	Quartermasters Stores. Built in 1911
Karibib	Kubas Railway Station. Built in 1900
Karibib	Haus Woll. Built in 1900s
Karibib	Hotel Zum Grünen Kranze. Built in 1913
Karibib	Erf 46 and the Hälbich buildings. Built in 1900s
Karibib	Kaiserbrunnen (Imperial well) - well, water reservoir and drinking trough. Built in 1906

NB. These recorded sites occur on the same cultural landscape but different farms

8.0 Conclusions and Recommendations

8.1 Findings and Analysis

- a. It was noted during this assessment that Zondi Shipuata and the JTD Mining Group initiated environmental clearance without following the requisite procedures of having an Archaeological and Cultural Impact Assessment as provided for by the Environmental Management Act (2007) and National Heritage Act 27 of 2004 and guidelines for developers but the Ministry of Environment intervened and halted the project immediately, that's when the proponent hired specialists to assist with the required assessments.
- b. The assessment team also noted that the proposed project area does have visible cultural and archaeological material.

8.2 Recommendations

The study did not find any high-risk heritage with a potential to be disturbed by the exploration development. The following recommendations are based on the results of the A/HIA research, cultural heritage background review, site inspection and assessment of significance.

Recommendation 1

Since only four (4) heritage sites were found the Consultant is to ensure that all the existing archaeological reference guidelines (Chance Find Procedure Guideline by NHC (2017) is shared with the proponent for guidance. Against the background of the above, it is hereby **recommended that Zondi Shipuata and the JTD Mining Group the proponents, can be granted permission to proceed with the proposed project at EPL 6217 located about 8km north east of the small town Uis in the Daures Constituency, Erongo Region in Namibia.** It should also be noted that when such permission to proceed with exploration is granted, the developer will still be obliged to comply with the provisions of the National Heritage Act, act 27 of 2004 and if he

encounters subsurface archaeological/ cultural materials in the course of prospecting. If such a thing happens, he is obliged by this said Act for him to cease operations and make a report to National Heritage Council for the way forward.

Recommendation 2

The foot print impact of the proposed exploration should be kept to minimal to limit the possibility of encountering chance finds within servitude. The developer should keep **a buffer of 50 meters** on all the sites observed within the project area.

Recommendation 3

The Project Public Participation Process should ensure that any cultural heritage related matters for this project are given due attention whenever they arise and are communicated to NHC throughout the proposed project development. This form of extended community involvement would pre-empt any potential disruptions that may arise from previously unknown cultural heritage matter that may have escaped the attention of this study.

Recommendation 4

It is further recommended that a comprehensive study be conducted on the Rock painting and shelter caves (Figure 7 and Figure 8) by the competent authorities which are the NCH and NMN to ascertain the extent of this artefactual distribution and content in the area. The objective is to record and document these sites and to ascertain the communities that inhabited/used this caves that likely goes back to pre-colonial era. Test pits and other less intrusive archaeological methods can be employed. This is indeed an interesting discovery.

9. Conclusion

The literature review and field study confirmed that the project area is situated within a contemporary cultural landscape dotted with settlements with long local history (Kinahan, 2020). Field survey established that the affected project area is degraded by environmental

clearance. Although the area is degraded, there is a possibility that subsurface archaeological material can be discovered. This report concludes that the proposed exploration development EPL 6217 may be approved by NHCN to proceed as planned subject to recommendations herein made and Chance Find Procedures are followed (also see Appendices). The measures are informed by the results of the HIA study and principles of heritage management enshrined in the NHA, Act 27 of 2004.

References

Kinahan, J. 2011. From the beginning: the archaeological evidence. In Wallace, M. and Kinahan, J. A history of Namibia: from the beginning to 1990. London: Hurst & Co., pp 15-44.

Kinahan, J. 2020. Archaeological assessment Sukses, Hakskeen and Trekope.

Environmental Impact Assessment (EIA): final scoping report for the construction of Elephant Ridge Camp in Otjimboyo Conservancy, Erongo Region (Namibia).

Nankela, A. 2020. Joint archaeological monitoring impact assessment study report Otjohorong Granite Hill and Gross Okandjou farm, Erongo Region.

Nankela, A (2019) Klein Spitzkoppe Mountains archaeological research (phase 1), May 2019 Unpublished report, National Heritage Council of Namibia.

Independent Environmental Consultants. 2018. Environmental Assessment for Eight Exclusive Prospecting Licenses in the Omaheke Region Draft Environmental Management Plan.

Appendix 1 Chance Find Procedure Guideline by NHC (2017)

Areas of proposed exploration activities are subject to heritage survey and assessment at the planning stage. These surveys are based on surface indications alone, and it is therefore possible that sites or items of heritage significance will be found in the course of exploration work. The procedure set out here covers the reporting and management of such finds.

Scope: The “chance finds” procedure covers the actions to be taken from the discovery of a heritage site or item, to its investigation and assessment by a trained archaeologist or other appropriately qualified person.

Compliance: The “chance finds” procedure is intended to ensure compliance with relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “a person who discovers any archaeological objectmust as soon as practicable report the discovery to the Council”. The procedure of reporting set out below must be observed so that heritage remains reported to the NHC are correctly identified in the field.

Responsibility:

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, advise management, and recover remains

Procedure:

Action by person identifying archaeological or heritage material

- a) If operating machinery or equipment stop work
- b) Identify the site with flag tape
- c) Determine GPS position if possible
- d) Report findings to foreman

Action by foreman

- a) Report findings, site location and actions taken to superintendent

b) Cease any works in immediate vicinity

Action by superintendent

a) Visit site and determine whether work can proceed without damage to findings

b) Determine and mark exclusion boundary

c) Site location and details to be added to project GIS for field confirmation by archaeologist

Action by archaeologist

a) Inspect site and confirm addition to project GIS

b) Advise NHC and request written permission to remove findings from work area

c) Recovery, packaging and labeling of findings for transfer to National Museum

In the event of discovering human remains

a) Actions as above

b) Field inspection by archaeologist to confirm that remains are human

c) Advise and liaise with NHC and Police

d) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.