



National Heritage Council of Namibia

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OFFICE OF THE DIRECTOR

Enquiries: Agnes Shiningayamwe

03 October 2022

Ms Jenny Elaine Van Der Walt
P.O.Box 25365
Windhoek

Dear Sir

**RE: APPLICATION FOR CONSENT FOR PROPOSED MINERAL EXPLORATION
ON PROSPECTIVE LICENCE (EPL) NO.7345, ERONGO REGION, NAMIBIA**

NHC hereby acknowledge receipt of your application for consent and HIA report titled **PHASE 1 ARCHAEOLOGICAL AND CULTURAL IMPACT ASSESSMENT REPORT FOR PROPOSED MINERAL EXPLORATION ON AN EXCLUSIVE PROSPECTING LICENCE (EPL) No. 7345, ERONGO REGION, NAMIBIA** which we have reviewed and would like to bring the following to your attention.

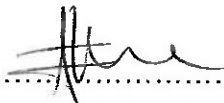
Upon the review of the Heritage Impact Assessment the Council took a decision that information provided in the HIA should be verified before issuance of the consent. The primary task of the verification for Heritage Impact Assessment is to identify sensitive heritage resources that could be affected by the proposed exploration activities with the view to preserve and safeguard heritage resources. The verification is fundamental part of the HIA process and forms basis of recommended management actions to avoid or reduce negative impacts. The process is in line with legal requirement of section 55 (5) b of the National Heritage Act, Act no. 27 of 2004.

Against this background NHC hereby informs you that the verification trip for this application will take place during the period of 24th October – 11th November 2022.

Council Members: Mr Moses Moses (Acting -Chairperson), Ms Helke Mocke (Vice Chairperson) Ms. Sanet Steenkamp (Executive Director), Ms Elizabeth Brown (Treasurer), Mr Herbert Karapo, Mr Kennedy Kariseb, Ms Una Ferraira

As per section 55 (5) (d) of the National Heritage Act (Act.No.27 of 2004).The cost of such verification shall be borne by the proponent. Please find the invoice attached.

Yours in Heritage Conservation and Management,



.....
Mrs. Erica Ndalikokule

Director

National Heritage Council of Namibia



Council Members: Mr Moses Moses (Acting -Chairperson), Ms Helke Mocke (Vice Chairperson) Ms. Sanet Steenkamp (Executive Director), Ms Elizabeth Brown (Treasurer), Mr Herbert Karapo, Mr Kennedy Kariseb, Ms Una Ferraira

**PHASE 1 ARCHAEOLOGICAL AND CULTURAL IMPACT
ASSESSMENT REPORT FOR MINERALS EXPLORATION ON AN EXCLUSIVE
PROSPECTING LICENSE (EPL) NO. 7345, ERONGO REGION, NAMIBIA**

Compiled by:

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And

Dr Mowa Eliot, Maritime Archaeology University of Bristol. PhD

Archaeology (UP).

Compiled for:

Jenny Elaine van der Walt

Item	Description
Proposed development and location	Jenny Elaine van der Walt (The Proponent) is intending to conduct exploration and drilling activities on Exclusive Prospecting License (EPL) 7345 to explore for base and rare metals and dimension stones. The EPL is situated approximately 10 km South - West of Uis, along the road to Hentisbay in the Erongo Region. The EPL covers a surface area of 11325 Hectares and is situated in communal land.
Title	ASSESSMENT REPORT FOR MINERALS EXPLORATION ON AN EXCLUSIVE PROSPECTING LICENSE (EPL) NO. 7345 in ERONGO REGION, NAMIBIA
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	EPL 7345 is centered at: 21°14'49''S 14°47'45''E
Municipalities	Uis, Erongo Region
Predominant land use of surrounding area	Farming and Mining
Proponent	Jenny Elaine van der Walt
Heritage Consultant	OTAH & ESM Cultural Heritage Consultants (JV)
Date of Report	11 August 2022
Contact person	Henry Nakale +264816680633
Author(s) identification	Dr. Eliot Mowa and Henry Nakale, (Archaeologists and Heritage specialists)

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Authorship: Mr. Henry Nakale and Dr. Eliot Mowa have prepared this A/HIA Report. The report is for the review of the National Heritage Council of Namibia.

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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 **Jenny Elaine van der Walt**.

Signed by:

HNakale

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Executive Summary

An archaeological impact assessment was carried out for Jenny Elaine van der Walt focusing on the proposed exploration activities on EPL 7345 near Uis District in the Erongo region. The assessment therefore reviewed the archaeological records, historical documents from the previous studies surrounding the area, interview with locals and a field survey as a basis of inference to conclude that damage or disturb sites or materials protected under the National Heritage Act (27 of 2004) is unlikely to occur. However, due to the possibility that buried archaeological remains could come to light in the course of construction work the client is advised to adopt the Chance Finds Procedure attached as Appendix 1 to this report. of the selected target areas.

Introduction

Jenny Elaine van der Walt has appointed Impala Environmental Consulting to apply for an ECC from the ministry of Environment, Forestry and Tourism on their behalf. Impala Environmental Consulting in return then appointed OTAH and ESM Cultural Heritage Consultants (**JV**) on behalf of the proponent to conduct a Heritage Impact Assessment (AIA) at the Exclusive Prospecting License (EPL) No: 7345, The EPL is situated approximately 10 km South - West of Uis, along the C36 road to Hentisbay in the Erongo Region. The EPL covers a surface area of 11352 Hectares and is situated in communal land (**see figure 1**).

Jenny Elaine van der Walt., hereinafter referred to as the proponent intends to carry out the following activity:

- **To undertake exploration and drilling activities on Exclusive Prospecting License (EPL) 7345 to explore for Base and rare metals, dimension stones, industrial minerals and precious stones.**

Due to the destructive tendency of such exploration activities, which may include earth moving/ land alteration operations, it is 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 exploration or mining activities. It was against that backdrop that an Archaeological Impact Assessment (AIA) was carried out on EPL 7345 to fulfill the following objectives:

- a) To identify and document cultural or archaeological materials and sites occurring within and around EPL 7345.
- b) To suggest some conservation strategies and mitigation measures for the cultural heritage resources that might occur in the area proposed for explorations, which can be potentially destroyed in the course of such exploration activities.

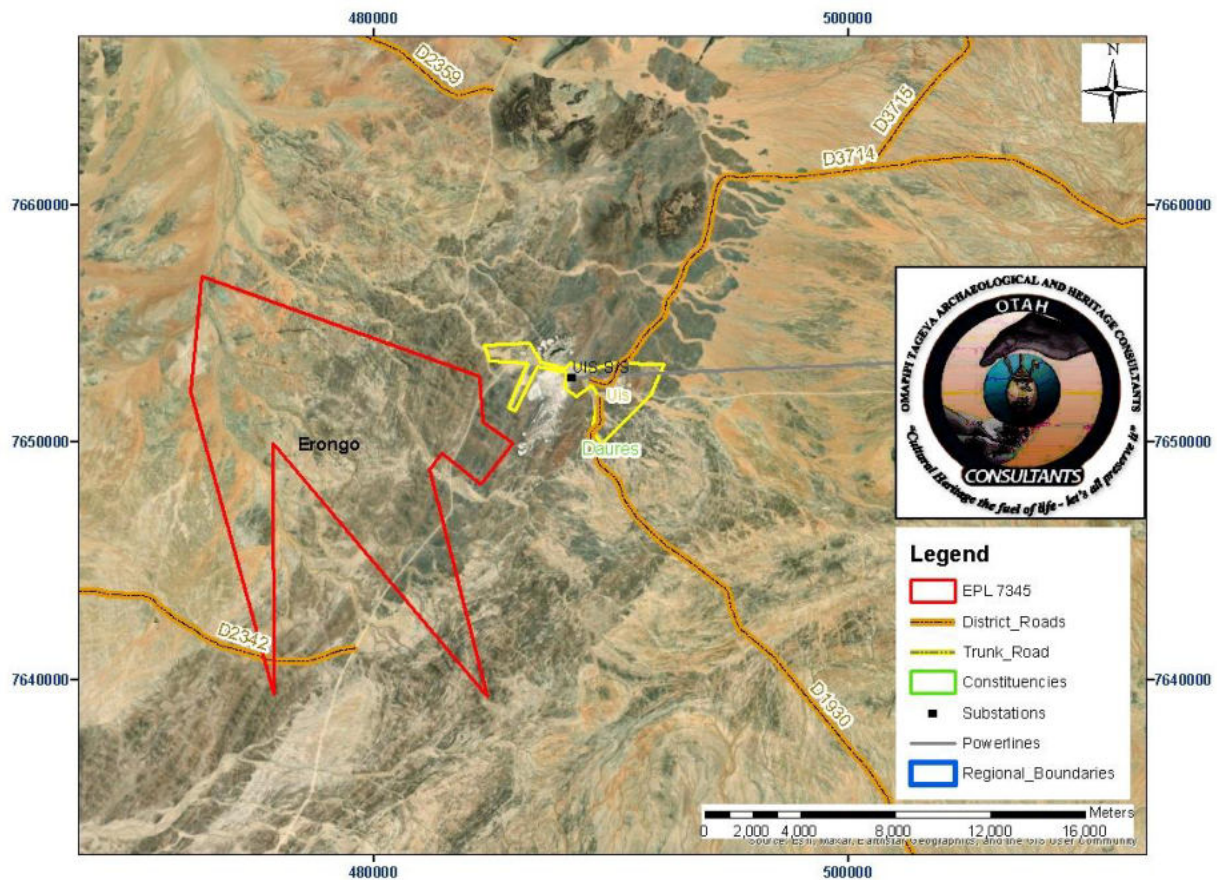


Figure 1; Locality map for EPL 7345 near Uis district in Erongo region (Source: Omavi Geotech 2022).



Figure 2; satellite imagery for EPL 7345 in relation to the Brandberg Mountain circled in red (Source: Namibia Mining Cadastre Map Portal 2022).

1.1 Project Description

The targeted commodities at EPL 7345 are industrial minerals, base, rare earth elements and precious metals. Therefore, both non-invasive and invasive exploration methods are to be exploited. Non-invasive exploration methods usually include remote sensing, geological field mapping, ground geophysical survey, surface soil sampling and etc. whereas invasive exploration methods include more destructive methods of exploration such as reverse circulation or diamond drilling and pitting/trenching. Non-invasive exploration activities will be undertaken first in order to define the need for more invasive activities. Should the results from the non-invasive activities be positive the detailed site-specific drilling, trenching, and sampling will be undertaken.

2.0 Legislations

In most cases where the aspect of mining is involved, cultural and archaeological evidence located within areas earmarked for development or mining usually face the danger of destruction. The legal instrument for the protection of heritage sites and objects in Namibia is the National Heritage Act (No. 27 of 2004).

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 Environmental Management Act (EMA) No. 7 of 2007 and its 2012 EIA Regulations. 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.

3.0 Approach to study

3.1 Terms of Reference

The main objective of this archaeological survey and assessment was to identify and record all sensitive archaeological sites within the limits of EPL 7345 that could be negatively affected by the above – mentioned project. The assessment also intended to establish heritage significance of possible resources and assess their vulnerability, estimates the extent of the possible impacts and establish mitigation measures. This study was intended to satisfy the requirements of the Environmental Management Act (7 of 2007), and those of the National Heritage Act (27 of 2004).

3.2 Methodology

This Heritage & Archaeological Impact Assessment followed desktop-based assessments and field surveys. These methodologies are standards for environmental and heritage assessments 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, National Museum of Namibia, archaeological GIS spatial data and record that has been substantially exposed during the last decades, by a series of detailed archaeological assessments carried out during the mineral investigation and mining operations, and the development of infrastructure required by these operations. These sources were then supplemented by site visit field work within EPL 7345.

Sensitivity and susceptibility rating scales, aimed at establishing the nature of vulnerability and sensitivity of heritage resources that are likely to be impacted by the exploration activities, were

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 finds 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.

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

CRITERIA	CATEGOR Y	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

4.0 Assumptions and Limitations

This heritage impact assessment described here relies on desktop studies and supported by field assessment 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. Nevertheless, it is very critical as a precautionary measure and best practice, we are recommending the proponent to strictly follow the chance find procedure as the project progresses should any archaeological objects be found during drilling, clearing 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 being taken against the proponent as per the Heritage Act of 2004.

5.0 Brief heritage setting of the Project Area

According to Kinahan (2011), Erongo Region is a highly significant archaeological landscape in Namibia whose resources represent irreplaceable evidence of global importance (**Figure 3**). The region surrounding Erongo Mountains has been the focus of several archaeological research and surveys during the last decades (see Sherz 1959; Breuil 1960s; Clark *et al.* 2014; Pleaudeau 2012 and Nankela 2013; 2017; 20202). The wealth of the other archaeological and historical data has been considerably recorded over the last decades, through various reconnaissance and detailed archaeological assessments conducted because of exploration and mining operations and generally by the infrastructure-related development required by these operations. These archaeological records have helped to determine the local archaeological sequence and to establish the relationship between archaeological sites and in relations to their landscapes that characterize the area, including granite Mountains, hills, outcrops and the many dolerite ridges that crisscross the Erongo terrains.

Such data indicates that its archaeological chronology dates from the last 5000 years to 1000 years when significant changes in human settlement patterns and economic activities occurred in the immediate semi-desert hinterland. These are attributed to Hunter-Gatherers, Herder's economy and to some extent, Pastoralists. They include pieces of evidence are reflected in materials records such as surface scatters of stone tools, rock shelters with evidence of occupation, including of 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 (Kinahan 2012; Nankela *et al* 2021).

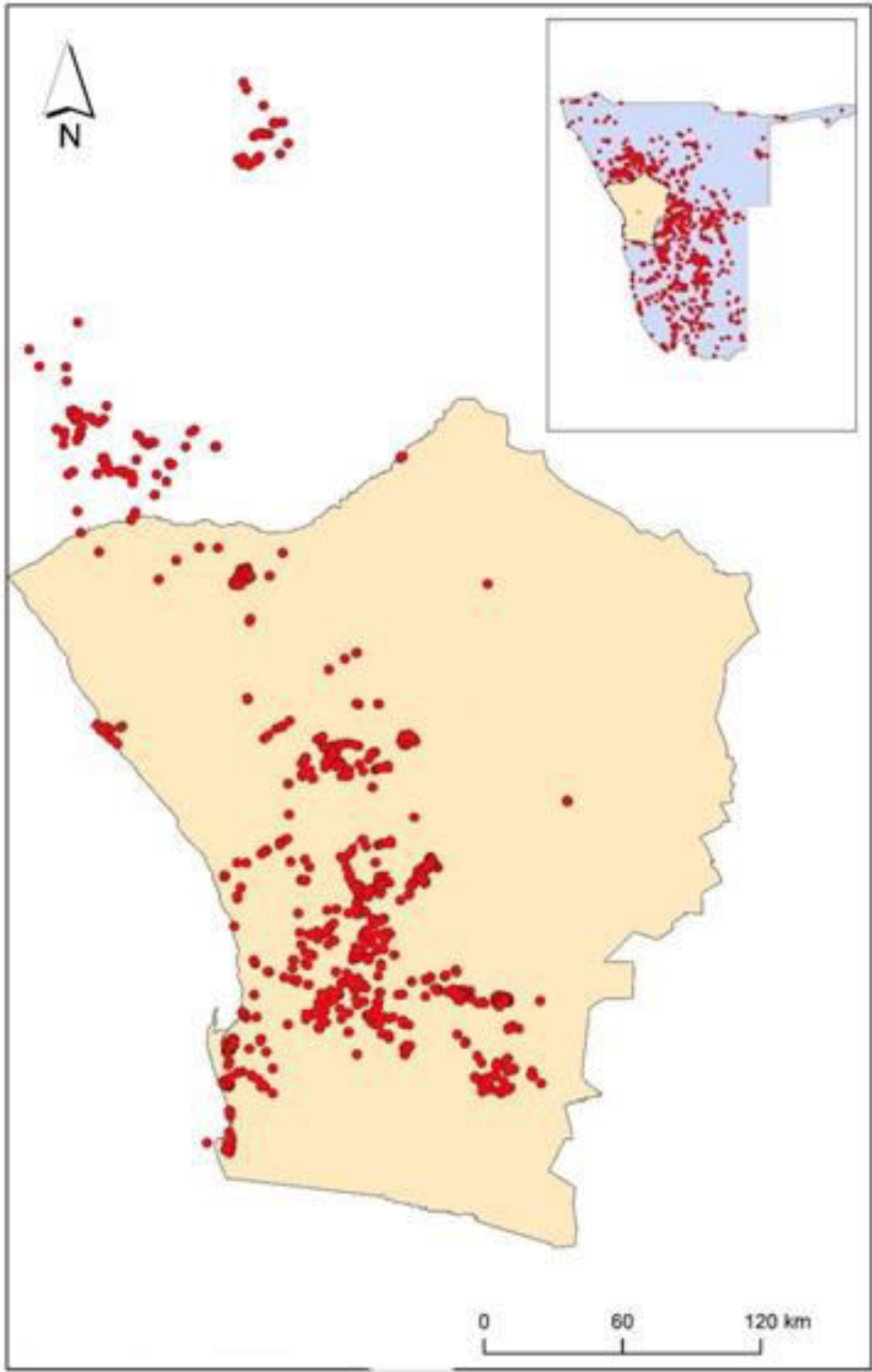


Figure 3: General distribution of archaeological sites in Erongo region and in relation to Namibia Source: authors. (rfc. Kinahan 2012)

6.0 Fieldwork Findings and Observations

A reconnaissance survey was carried out over EPL 7345 to locate and record the most important archaeological features on the 07 August 2022 in the Erongo Region. This assessment involved a detailed field survey, and two interviews with Mr. Stephanus Ngaringobe and Mr. Anton both locals from Uis 2 settlement and Septy village respectively. This study did not record any major archaeological sites or heritage resources within the footprints of EPL 7345 that might be negatively impacted by the proposed exploration activities. However, it is worth noting that there are village cemeteries in Septy village and Uis 2 settlement, there are also a few stone cairns and noticeable hunting blinds within the boundaries of EPL 7345.

The site locations are set out below together with brief remarks on their significance. The vulnerability of the sites is given in terms of their sensitivity. Mr. Stephanus Ngaringobe acknowledged that he is aware of some rock paintings that are in !Narixams settlement which is located 15 km west of Uis 2 settlement towards the Brandberg mountain, the !Narixams is however located outside the boundaries of EPL 7345. In a different interview with Mr. Anton, who sells precious stones by the Uis – Hentisbay main road for a living. Mr. Anton who has been living in this area for over 20 years, said that he has been walking to the Brandberg mountain often to go mine for precious stones but has never come across any archaeological sites, apart from the rock paintings in the Brandberg mountain.

Site one; village cemeteries

Site coordinates 21°18'32.29''S 14°48'39.75''E

Site Description: fenced off village cemeteries located in Uis two settlement with marked graves and are still being utilized by the villagers.

Significance rating: 0 (No heritage significance)

Vulnerability rating: 0 (Not Vulnerable – still being used and well fenced off)

Site 2 Stone/marker cairns and possible hunting blinds

Site coordinates: 21°14'53.42''S 14°48'14.89''E

Description: Man – made pile or stack of stones raised at a meter high and a natural stone vein that looks like a boundary wall, possibly used as a hunting blind given the fact that the Brandberg mountain is just within 10 km west and there is evidence of human occupation in the Brandberg, chances of them hunting this far are pretty much possible.

Significance rating: 2 (Isolated minor finds in undisturbed primary context, with diagnostic materials).

Vulnerability rating: 2 (Low or indirect threat from possible consequences of development (e.g., soil erosion).



Figure 4; man - made stone cairns within EPL 7345 (Sources: Authors 2022).



Figure 5; Natural stone vein that looks like a boundary wall, possibly used as a hunting blind (Sources: Authors 2022).

7.0 Results of Desktop Research

According to several researchers, the Erongo Region including the central Namib Desert is recognised as a major archaeological landscape in Namibia (see Kinahan 1990, 2012, 2021; Lenssen-Erz 1997; Nankela 2011; 2013, 2017, 2020 etc.) also (**Figure 3**).

Information from the NHC shows that the project area falls under the cultural landscape occurring in Erongo Region. Before its restructuring and renaming to National Heritage Council, the national monument had 37 national monuments recorded within Erongo Region. 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 Heritage Council inventory register. It is critical to note however that these heritage sites that are registered in the national heritage inventory of the National Heritage Council are further away from the area that is considered for exploration activities EPL 7811, their listing here is for contextualisation of the heritage resources within the Erongo region in which the project under discussion is planned.

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 Cave)
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
	Kaiserbrunnen (Imperial well) - well, water reservoir and drinking trough. Built in 1906

8.0 Conclusions and Recommendations

The field survey within EPL 7345 did not record any major archaeological sites that might be negatively impacted by the proposed explorations, apart from the village cemetery that is

demarcated and still being used by the villagers and stone cairns and the significance rating of these sites is referred to in Table 1. However, it is possible that subsurface remains will be exposed during site preparation and explorations therefore the proponent is strongly advised to adopt the chance find procedure.

8.1 Management recommendations

The site's locations must be incorporated within the project EMP and GIS.

- a) Creation of a 50 m radius buffer zone for site 2 identified in this assessment.
- b) Annual site inspections by the heritage council of the buffer zone to ensure the proponent abide by the conditions as set by the heritage council.
- c) Adopt the Chance Find Procedure

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

1. Chance Finds Procedure (CFP) management guideline:

EPL 7345 is an important mining infrastructure development area subject to heritage and archaeological assessment at the planning stage. These assessments were desktop-based, and field survey were carried out 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 discovers 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.

8.2 Conclusions

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. 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 activities on EPL 7345 may be approved by NHCN to proceed as planned subject to recommendations herein made and Chance Find Procedures are followed (see Appendix 1). The measures are informed by the results of the HIA study and principles of heritage management enshrined in the NHA, Act 27 of 2004.

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