A PHASE 1 REPORT ON HERITAGE IMPACT FOR THE PROPOSED EXPLORATION ACTIVITIES ON EPL8739, LOCATED SOUTH WEST OF WINDHOEK ON THE C26 ROAD KUPFERBERG, KHOMAS REGION, NAMIBIA.

Prepared for:

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DISCLAIMER:

I hereby declare that:

- a. I have the knowledge of and experience in conducting heritage Impact assessment (HIA), including knowledge of the Acts, Regulations, and Guidelines that are relevant to Namibian legislation, specifically the National Heritage Act (27 of 2004), as well as regulations and guidelines that have relevance to the proposed activity.
- b. I have performed the work relating to the application objectively, even if this results in views and findings that are not favourable to the proponent.
- c. Although all efforts are made to identify all sites of heritage significance during an assessment of study areas, the nature of heritage resources are as such that it is always possible that hidden or subsurface sites, features or objects could be overlooked during the study.
- d. Clients & Developers should not continue with any development actions until the National Heritage Council of Namibia has provided final comments on this report.

C. Nekare

World/Heritage Specialist (WHS)

SUMMARY

The aims of this Heritage Impact Assessment (HIA) is to identify possible heritage sites and finds that may occur in the licensed EPL area and determine whether any heritage resources are located within the area to be developed as well as the possible impact of the proposed development thereon. Furthermore, the study adapts an integrated look at the broader heritage resources and inform the proponent to manage the rediscovered heritage resources in a responsible manner, in order to protect, preserve, and develop them within the framework provided by the National Heritage Act (27 of 2004). Information in this HIA was obtained through field survey of the area supplemented by relevant HIA reports review and satellite analysis.

Previous work in the larger geographical area was utilized in the background study. This report discusses the results of both the background research and field assessment and provides recommendations on the way forward at the end.

From a Heritage Point of View, it is recommended that the proposed development be allowed to continue, taking into consideration the recommendations put forward at the end of the report.

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1. INTRODUCTION

World Heritage Specialist (Christian Nekare) was appointed by Geotrend & Research Data Solution CC to conduct a Phase 1 Heritage Impact Assessment for the proposed exploration activities on EPL 8739, located South West of Windhoek on the C26 Road, Kupferberg, Khomas Region, Namibia.

The Khomas cultural landscape holds a potential wealth of physical and human environment that includes a vast array of significant heritage resources. Most of these resources are covered by the surface of the earth. However, at national level, probably the most targeted cultural landscapes might be those associated with rock arts. Archaeologically, so far dozens of surface scatters have been identified but very few have been subjected to scientific considerations in the territory (Kinahan, 2021). The search for minerals and mining goes back to the ancestors of human race in Namibia, up-to-date numerous EPLs and MCs have, however, been granted for prospecting activities.

To its credit, the Government have been successful in developing policies that are harmonising the cultural sector. Other important heritage resources from the larger geographical territory includes, MSA and LSA sites (Hardaker, 2011) and heritage of later prehistoric periods ranges in age from about 200,000 years ago to the present. Apart from their significances, such heritage resources have high potential to enhance the tourist attraction of the country. As more sites are identified and studied, a great number of them remains at risk today than at any other time in history, because of human activities. Perhaps the most devastating threats to heritage resources in the territory is mining activities. At present, the nation has yet to develop a comprehensive national inventory register of its heritage resources, and a large part of the heritage remains archeologically *terra incognita*. Therefore, any activity resulting in disturbance of the land surface

is likely to threaten yet unidentified and undocumented heritage resources. One however has to realize that this most likely only indicates that not much research has been done here before.

Background research indicates that there are no heritage resources featuring in the targeted geographical area of the EPL. However, the western plains of the EPL contain several potential heritage resources, qualifying this part of the EPL area as a culturally sensitive landscape. Previous work in the larger geographical area was utilized in the background study.

The proponent indicated the location and boundaries of the study area and the assessment concentrated on this portion.

1. TERMS OF REFERENCE

A Heritage Impact Assessment (including Archaeological, Cultural heritage, Built Heritage and Paleontological Assessment) to determine the impacts on heritage resources within the study area.

The following are the required to perform the assessment:

- A desk-top investigation of the area;
- A site visit to the proposed development site;
- Identify possible archaeological, cultural, historic, built and paleontological sites within the proposed development area;
- Evaluate the potential impacts of construction and operation of the proposed development on archaeological, cultural, historical resources; built and paleontological resources; and
- Recommend mitigation measures to ameliorate any negative impacts on areas of archaeological, cultural, historical, built and paleontological importance.

2. LEGISLATIVE REQUIREMENTS

The National Heritage Act (No. 27 of 2004) together with its reinforced guidelines of (2021), complimented by the Environment Management Act (No. 7 of 2007) and its Regulations (2012) makes provision for a compulsory Heritage Impact Assessment when an area is earned marked for development. This is to determine if the area contains heritage sites/ resources and to take the necessary steps to ensure that they are not damaged or destroyed during development.

4. METHODOLOGY

4.1. Survey of literature

A survey of available literature was undertaken in order to place the development area in a heritage context. The sources utilized in this regard are indicated in the bibliography.

4.2. Field survey

The field assessment section of the study is conducted according to generally accepted HIA practices and aimed at locating all possible objects, sites and features of heritage significance in the area of the proposed development. The location/position of all sites, features and objects is determined by means of a Global Positioning System (GPS) where possible, while detail photographs are also taken where needed.

4.3. Oral histories

People from local communities are sometimes interviewed in order to obtain information relating to the surveyed area. It needs to be stated that this is not applicable under all

circumstances. When applicable, the information is included in the text and referred to in the bibliography.

4.4.Documentation

All sites, objects, features and structures identified are documented according to a general set of minimum standards. Co-ordinates of individual localities are determined by means of the Global Positioning System (GPS). The information is added to the description in order to facilitate the identification of each locality.

4.5. The limitations and assumptions associated with this heritage impact assessment are as follows;

- ✓ Field investigations were performed on foot and by vehicle
 where access was readily available.
- ✓ Sites were evaluated by means of description of the cultural landscape, direct observations and analysis of written sources and available databases.
- ✓ It was assumed that the site layout as provided by Geotrend
 & Research Data Solution CC is accurate.
- ✓ We assumed that the public participation process performed as part of the EIA process was sufficiently encompassing not to be repeated in the Heritage Assessment Phase.

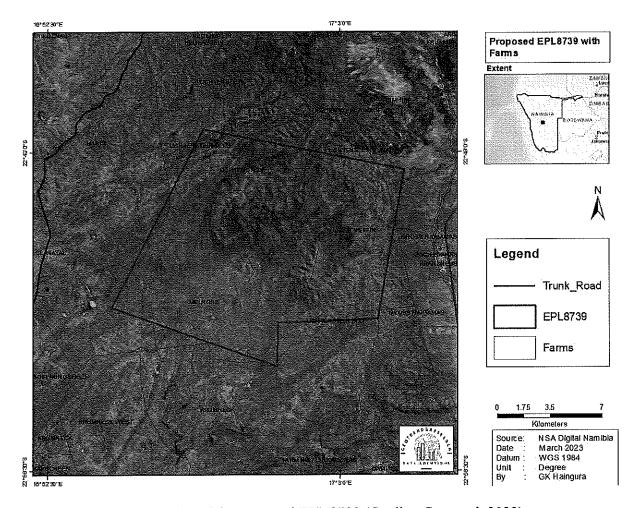


Figure 1: Overview location of the proposed EPL 8739 (Credits: Geotrend, 2023).

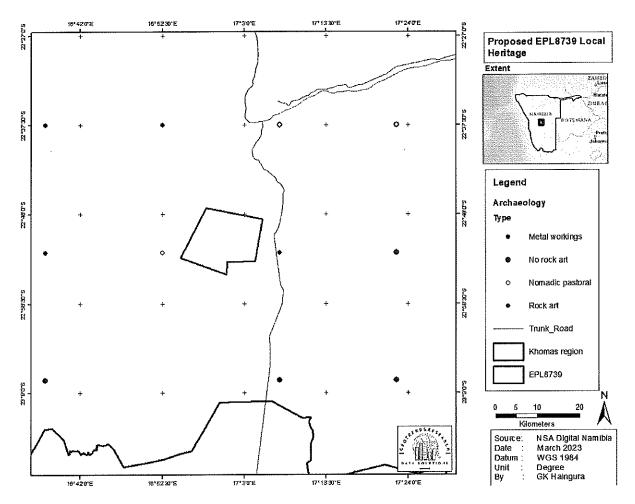


Figure 2: Overview of heritage sites in Khomas Region: (Credit: Geotrend, 2023)

5. THE RECEIVING ENVIRONMENT.

There are quite a number of known heritage sites in the Khomas cultural landscape but they are not very evenly distributed, a large number are situated in the southern cultural landscape, the vegetation region between Khomas and Hardap Region. The pottery sequence in this cultural landscape is still too patchy for meaningful interpretation but differs across the landscape. A real gap exists, moreover, in the South West of Windhoek, nothing is known at present archeologically. Taking into account the meagre facts known that this area has been the hotspot for geological studies due to its mineralisation. In this case one has to bear in mind, however, that the present limited heritage dataset, does not necessarily mean that there have

never been heritage resources in the area. In the larger geographical area, the excavation of the Eros Rock Shelter yielded a fair amount of pottery, some iron fragments and a single copper bead (Wendt, 1972) and the remains of at least two elephants - slaughtered by Stone Age hunters over 5,000 years ago - were discovered in the Windhoek area. A variety of stone tools were also found. They were made of quartz that were used mainly for chopping and cutting. These tools were made for killing elephants before butchering the meat. Today the original elephant remains and tools are stored at the National Museum of Namibia in Windhoek. (https://namibian.org/namibia/archaeology/prehistoric-elephant).

These cultural landscape lie beneath the pre-Damara rocks grouped with the Rietfontein Granite-Gneiss which are non-fossiliferous and are of no palaeontological concern. No fossils have been reported from the immediate environment of the EPL area before. Empowering the catalogue of the area, therefore, represents a vital aspect in the preservation of heritage resources that can contribute to the improved narrative of Namibia's past and provide a glimpses into the change of the local biological environment.

These region is crucial in understanding the entire Southern Africa's past. Despite growing archaeological studies in the region, many key debates about the archaeology of this area remain unresolved. The overall picture of heritage resources in the Region is still one of too little data. Only tentative conclusions can be drawn from a few sources spread over a vast cultural landscape. Broad change of the environment is evident, it is clear, however, prehistoric people were able to successfully inhabit even the mountainous reaches of the Region.

A number of Khoekhoen related heritage sites have been identified by (Sandelowsky, 2004) in the overlapped Geographical Region, while doing research on Khoekhoen ethnoarchaeology, integrated oral traditions, archaeology and ethnography to show the heritage of

khoekhoen people. The archaeology of the wide cultural landscape shows a local development of a Khoekhoen domination.

Indigenous hunter-gatherers occupied the region throughout the Holocene and a new population – likely Proto-Khoekhoe-speaking hunter-gatherers with limited numbers of livestock – entered the landscape approximately 2000 years ago. These last were the ancestors of the historically Khoekhoen pastoralists. The search for the prehistoric identity is not new and the subject has been examined repeatedly according to the following categories:

Earlier Stone Age (ESA) up to 2 million – more than 200 000 years ago: Characterized by surface scatters of stone tools and artefact debris, usually transported from original context by fluvial action, and seldom occurring in sealed stratigraphic context.

Middle Stone Age (MSA) less than 300 000 – 20 000 years ago: Characterized by dense surface scatters and rare occupation evidence in sealed stratigraphic context, with occasional associated evidence of food remains.

Later Stone Age (LSA) 40 000 years ago - 2000 years ago: Characterized by increasingly dense

a. and highly diverse evidence of settlement, subsistence practices and ritual art, as well as grave sites and other remains.

b. Historical (the last ca. 250 years): Characterized by remains of crude buildings, livestock enclosures, wagon routes and watering points, as well as graves, comprising small cemeteries near farm settlements or isolated burial sites.

The historic era is dominated by the conflict between Germans, Nama and Hereros. The Nama and Hereros established seasonal settlements in present-day Windhoek cultural landscape, then

the two group launched into action against the Germans. The Germans ruthlessly, massacred the two group (*It has become known as the first genocide of the 20th century*). The district of Kupferberg was established as farmscape, made up of all immaterial manifestation of culture, representing the variety of living heritage in the area.

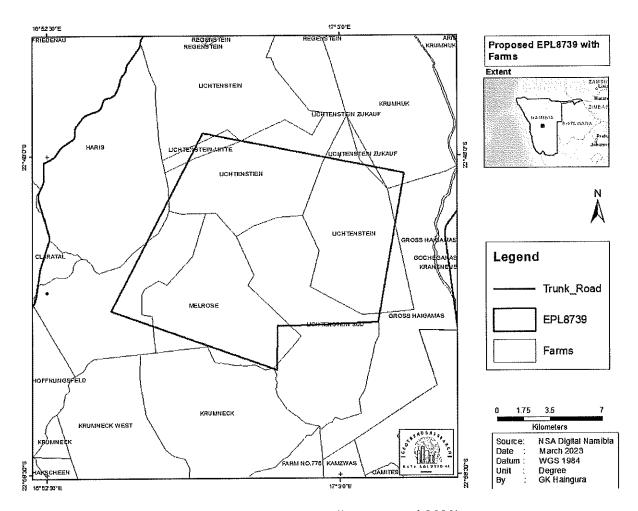


Figure 3: Locality of the proposed EPL 8739, (Credits: Geotrend 2023).

6. DESCRIPTION OF THE AREA

The EPL is situated within the Kupferberg district, approximately 29 km directly southwest of Windhoek. Presently, the EPL falls into several farm under cattle, wildlife management and tourism establishments. The vegetation is described as thornveld with Acacia mellifera and Acacia

Karoo dominating the landscape. Large stands of leadwood are found along streams. Average precipitation is about 300 mm per annum, the area is generally disturbed, flat although a topographic rise marks the mineralisation portion of the targeted Eastern Zone.

Most of the EPL flat plain consist of a number of unnamed streams crisscross the landscape, although the targeted area of the EPL have a relatively low heritage sensitivity. The western part of the EPL is condensed with significant heritage resources. Indications are that the graves are fairly marked, fenced and looked after. The farmers are aware of the graves, and that all measures will be taken to protect and safeguard them, if the development is approved. The results of these assessment show a consistent distribution of burial sites along the western strips of the EPL area. No known HIA has been conducted in the study area. The current approximate location of the EPL is shown above while coordinates are indicated below:

Longitude	Latitude	Longitude
16° 54'47"E	-22.885	16.91306
16° 58'05"E	-22.7872	16.96806
17° 05'18"E	-22.8094	17.08833
17° 04'22"E	-22.8914	17.07278
17° 00'46"E	-22.8933	17.01278
17° 00'46"E	-22.8936	17.01278
17° 00'45"E	-22.8936	17.0125
17° 00'43"E	-22.9178	17.01194
	16° 54'47"E 16° 58'05"E 17° 05'18"E 17° 04'22"E 17° 00'46"E 17° 00'46"E 17° 00'45"E	16° 54'47"E -22.885 16° 58'05"E -22.7872 17° 05'18"E -22.8094 17° 04'22"E -22.8914 17° 00'46"E -22.8933 17° 00'46"E -22.8936 17° 00'45"E -22.8936

This HIA focused the survey on the generic licensed EPL and the targeted area. The general view on the farms is basically the same.

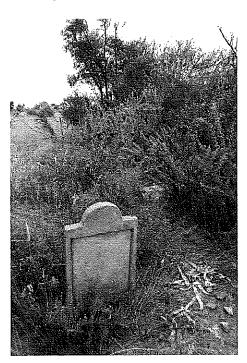
7. FINDINGS

The phase 1 HIA for this EPL have resulted in the identification several significant heritage resources. Generally, the targeted Eastern portion of the EPL is of low heritage potential and significant heritage finds in this EPL are limited to the Western portion of the EPL situated more than 20 km away from the targeted area within the EPL. These heritage resources will not be affected by the exploration activities and their detailed descriptions will be provided in this HIA. However, if subsurface heritage resources are discovered, the proposed exploration activities should cease and the area be demarcated by a danger tape.

So far some of the recorded graves are still fenced while some have lost the fence through natural process. The graves and their contents are protected in Namibia by the National Heritage Act (No. 27 of 2004), more especially when they 60 years old or beyond. These HIA survey contain remarkable finds that are scattered across the Western portion of the EPL area – Important to note that these resources fall outside the targeted portion of the EPL area, despite being mapped on the same EPL. The burials are evidence of careful planning. "It's not an accumulation of burials by accident, but a place where they decided to put their dead. Farm burials have changed the face of the country as a separated people, evidence of past relations that were chilly and people buried here might have had limited contact with each other's.

Site 1: Grave site containing four people, probably biological related, according to the observation two of them are infants. Some tombstones are inscribed with names and date of death while some are plain. Therefore, it is safe to argue that in the absence of any person with knowledge/sources on the identities of the people buried here that they might be associated to the family networks of

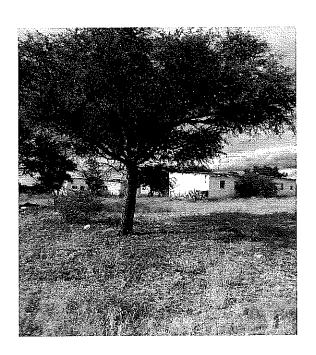
farmworkers. However, to go with the flow of the names, we can conclude that these graves after dark belong to the Kheokhoen community.



View of ONE GRAVE on the Western portion of the proposed EPL area.

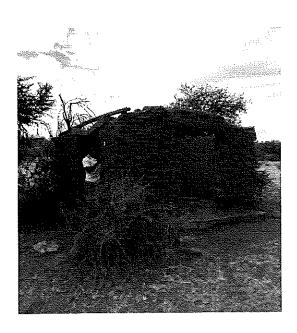


View of TWO GRAVES on the Western portion of the proposed EPL area.

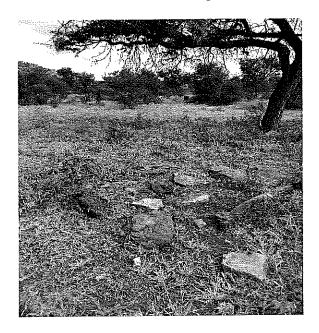


View of the HISTORICAL BUILDINGS on the Western portion of the proposed EPL area.

Site 2: These are abandoned structure that are occurring on the Western portion of the EPL and could be considered under the categories of Vernacular Architecture. However, more investigations are needed before any decision could be taken on the status of these heritage resources. The stone enclosures, this could have been a fireplace, probably not very old, but require deductive research.



View of the abandoned structure on the Western portion of the proposed EPL area.



View of the STONE ENCLOSURE on the Western portion of the proposed EPL area.

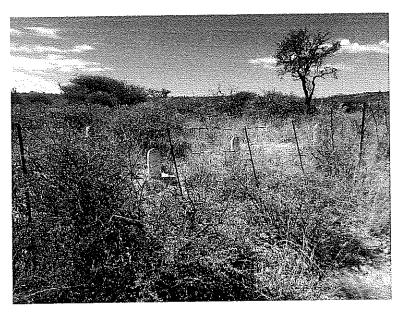
Site 3: Containing graves of two persons marked with tombstones and concrete waterproofing.

Natural process has vandalized the fence that was enacted around the graves. More people perhaps are buried on this site, since it is in the valley evidence is washed away.



View of the TWO GRAVE on the Western portion of the proposed EPL area.

Site 4: This are well-protected graves, about eight people are buried here. The gender and age composition of the decreased is mixed. In terms of practicality, fences were placed around the cemetery to prevent animals from entering the grave site.



View of the GRAVEYARD on the Western portion of the proposed EPL area.



View of the DAM on the Western portion of the proposed EPL area (These are the pioneering dams).

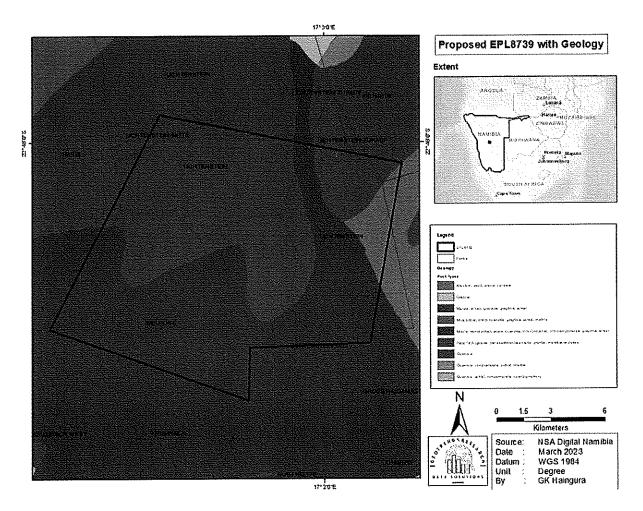


Figure 4: Geology of the proposed EPL 8739, (credits: Geotrend, 2023).

8. GEOLOGY OF THE AREA

The upper marble, basal bed of the Khomas series, comfortably overlies the laminated quartzite. The general strike direction is southwest: the dip varies 10 to -65 northwest. The Hakos series locally represents the northern limb of the regional Aris anticline. Field observation on the upper marble indicates parasitic folding within this limb. The main rock type is identified as biotite schist, but with minor strata of micaceous quartzite, feldspathic schist and amphibole schist (Labuschagne, 2004, and Mendelsohn, et al, 2002). The soil cover in the study area is largely shallow and has been derived from the underlying lithologies and is classified as 'leptosol'

(Mendelsohn, et al 2002) referring to shallow soil cover overhard rocks. 'Leptosol' dominate the entire EPL area.

9. IMPACT ASSESSMENT (FIELD ASSESSMENT)

It is important to note that the whole EPL area was surveyed with extensive focus on the targeted area. Several graves, dams, stone enclosure and structures were identified within the larger geographical area. These resources are located away from the targeted area and no impact is expected on these resources but provides context to heritage management within the EPL area. The identified resources date to 1960s and 1970s respectively. Some of these heritage resources are almost 60 years and beyond. The HIA ensures that all relevant factors are addressed and for each predicted impact, criteria are applied to establish the significance of the impact based on likelihood and consequence. This table summarises the heritage resource types assessed during field assessment, and observations according to the grading of the NHC guidelines 2021.

The table below grades heritage significance for heritage resources in Namibia.

Level of significance	Grading	Description
Exceptional/upper	5	Major national heritage resources.
higher	derent billionnender vider delte op der	Rare & outstanding example.
		Containing unique evidence of high regional & national
		significances.
Considerable high	4	Very important to the heritage of the region.
		High degree of integrity/ authenticity.
		Multi-component site and objects
		High research potential

Moderate	3	Contributes to the heritage of the locality and region
		Has some altered or modified elements, not necessarily
	T T T T T T T T T T T T T T T T T T T	detracting from the overall significance of the place.
		Forming part of an identifiable local distribution or group.
		Research potential.
Low	2	Isolated minor finds in undisturbed primary context, with
		diagnostic materials
000000000000000000000000000000000000000		Makes some contribution to the heritage of the locality, usually
7	1	in the combination with similar places or objects
Little	1	Makes little contribution to the heritage resources of the
		locality.
		Heritage resources in a disturbed or secondary contexts, without
		diagnostic or associated heritage.
Zero/ no significance	0	Absence of heritage resources
		Highly disturbed or secondary context, without diagnostic or
		associated heritage

Paleontology

No sites of paleontological value are located within this EPL.

Nature of Impacts: No sites are located within the EPL; therefore, no impacts are anticipated.

Extent of Impact: Due to the lack of paleontological sites within this area, the extent of impacts will be zero.

Level of significance	Grading	Description
Exceptional/upper higher	5	 Major national heritage resources. Rare & outstanding example. Containing unique evidence of high regional & national significances.
Considerable high	4	 Very important to the heritage of the region. High degree of integrity/ authenticity. Multi-component site and objects High research potential
Moderate	3	 Contributes to the heritage of the locality and region Has some altered or modified elements, not necessarily detracting from the overall significance of the place. Forming part of an identifiable local distribution or group. Research potential.
Low	2	 Isolated minor finds in undisturbed primary context, with diagnostic materials Makes some contribution to the heritage of the locality, usually in the combination with similar places or objects
Little	1	 Makes little contribution to the heritage resources of the locality. Heritage resources in a disturbed or secondary contexts, without diagnostic or associated heritage.

Zero/ no significance	Absence of heritage resources
	Highly disturbed or secondary context, without diagnostic or
	associated heritage

Prehistoric

This EPL site shows no signs of pre-contact sites in the investigated area.

Nature of Impacts: The development can result in the localized uncovering of sites from the precontact era.

Extent of Impacts: Taking into account the lack of sites in the study area these impacts can be seen as minimal.

Level of significance	Grading	Description
Exceptional/upper	5	Major national heritage resources.
higher		Rare & outstanding example.
	AMM177	Containing unique evidence of high regional & national
		significances.
Considerable high	4	Very important to the heritage of the region.
		High degree of integrity/ authenticity.
Verenty i		Multi-component site and objects
		High research potential
Moderate	3	Contributes to the heritage of the locality and region
		• Has some altered or modified elements, not necessarily
		detracting from the overall significance of the place.

		Forming part of an identifiable local distribution or group.
		Research potential.
Low	2	Isolated minor finds in undisturbed primary context, with
		diagnostic materials
		Makes some contribution to the heritage of the locality, usually
		in the combination with similar places or objects
Little	1	Makes little contribution to the heritage resources of the
		locality.
		Heritage resources in a disturbed or secondary contexts, without
		diagnostic or associated heritage.
Zero/ no significance	0	Absence of heritage resources
		Highly disturbed or secondary context, without diagnostic or
		associated heritage

Post-Contact Heritage

Several buildings making up farmstead are still intact and inhabited whilst others have been reduced to rubble. The buildings, although inhabited, are in poor condition. Three cemeteries found on the Western portion of the EPL. These graves are well safeguarded, known to the farms and fenced.

Nature of Impacts: No impacts.

Extent of Impacts: None anticipated

Impact statement

Paleontological sites

No paleontological sites of high value could be identified at this EPL.

Mitigation

No mitigation is recommended

Archeological sites

No archaeological sites were identified. Possible sub-surface sites could be disturbed by future mining activities.

Mitigation

No mitigation is recommended.

Built Environment

Heritage sites associated with the built environment is located within this EPL area. However, they are away from the targeted EPL area.

Mitigation

No mitigation is recommended.

10. CONCLUSIONS AND RECOMMENDATIONS

Several heritage sites were found including graves sites, dams, rock enclosure and protected structures. Structures and the remains thereof that are 60 years and beyond are protected by Act. The cultural landscape around the Western portion of the EPL serves as a significant cultural landscape. A variety of heritage sites are known to occur in this part of the EPL area. The most outstanding among them are the burial sites, as well as a large number of sites dating to historic times. This HIA confirmed that the targeted EPL area is situated within the none cultural landscape. Identified heritage sites can be recorded and a management plan can be developed for responsible

action. The proponent is advised that concentration of heritage resources in the Western portion of EPL does not mean they are not featuring in the demarcated targeted area, as demonstrated the archeological resources identified in the study area are of significant heritage values. Therefore, it is essential that cognisance be taken of the larger cultural landscape of the area in order to avoid the destruction of subsurface heritage resources. It should be stated that it is likely that further underground heritage resources might occur elsewhere in the proposed Area along and burials and historically significant structures dating to the historical period occur on within the EPL area and these resources should be avoided during all phases of development, with the implementation of the mitigation measures in this report no significant heritage resources will be affected by the development and therefore the impact of the project on heritage resources are low and the project can commence.

Recommendations for condition of authorization, the following apply:

- Implementation of a chance find procedure for the development
- Demarcation of known sites on development plans
- Monitoring of the burial site during the cycle of the development.

The EPL area is rural in character and sparsely developed, characterized by farming and tourism developments next to the C26 road. Several cemeteries, dams as well as bridges and structures were identified within the larger geographical area. These features are located away from the targeted area and no impact is expected on these features but provides context to the cultural landscape in which the project is located. The identified heritage resources will require management measures to be safeguarded during the development Phase of the project. The HIA concluded that a Fossil Chance Find Protocol should form part of the development.

APPENDIX A: Chance find

A. 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, advice management, and recovers remains

B. Procedure:

Action by the person (operator) 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

C. Action by foreman:

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

D. Action by superintendent

- (a) Visit the site and determine whether work can proceed without damage to findings;
- (b) Determine and mark the exclusion boundary
- (c) Site location and details to be added to the Archaeological Heritage database system.

E. Action by archaeologist

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

F. 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 Guidelines; and
- (d) Recovery of remains and removal to National Museum or National Forensic Laboratory, or as directed.

10. Reference

Kinahan J (2021) archaeological assessment on EPL 7699 (including exploration and small-scale mining targets on mining claims 68855-68861 and 67633), located near Rehoboth, Namibia

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Sandelowsky B (2004) Archaeologically yours. A personal journey into the prehistory of Southern Africa, Namibia. ISBN 9991640576 / ISBN 99916-40-57-6

Wendt W.E (1972) Preliminary report on an archaeological research programme in South West Africa

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