

## Comments and Responses Table

### E-Mail Correspondence Received

**Note:** E-mails received solely for the purpose of registration as an I&AP are not included in the comments and responses table. Comments are presented as received with no changes in typing or related errors. Contact details are redacted for privacy reasons.

| Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>From: Dr J Kemper</b><br><b>Date: 19 August 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>In particular, I am concerned about potential environmental impacts during the construction activities of both phases - especially if dredging and/or blasting is envisaged, and how associated noise (especially during blasting) could affect birds nesting on the two harbour islands (Penguin and Seal islands). Dredging harbour muds which probably contain elevated levels of heavy metals (and possibly of chemicals like anti-fouling agents etc), are likely to affect the mariculture ventures nearby, as well as the natural benthic biota associated with the shoreline and the two islands. This, in turn, could affect organisms that feed on these, including other invertebrates, but also higher trophic levels such as waders and oystercatchers. Other potential pollution sources, especially during construction activities, could include plastic/rubbish, oil, cement (and possibly others) that may affect both mariculture and the natural environment downstream.</p> <p>I assume that you will have a specialist assessing the risk that any pollutants that may be released during the construction/reclamation phases may pose, and also trust that there are practical mitigation measures that can be applied to minimise the risk to mariculture and to the natural environment, including the two harbour islands. I hope that there is already a long-term baseline study in place that monitors pollution levels in the existing port, including from manganese and lead loading activities that you could draw on, as well as any baseline studies on heavy metal accumulation in shellfish in the port area (compared to "control" areas outside the port area).</p> | <p>No blasting will be conducted for this project. Dredging will be conducted in line with the existing EIA and EMP for dredging in the Port of Lüderitz. This includes real-time monitoring for increased turbidity and pausing of dredging activities if suspension of sediments exceeds set limits. Long term baselines on water and sediment contamination levels are not available, but with previous dredging exercises, baselines were determined as presented in section 9.6. Dredging of these seabed sediments in the form of periodic maintenance dredging have been ongoing in this area of the port for as long as the port existed to date, on a 5 to 10 year cycle and has been occurring without any issues and in harmony with the existing mariculture industry.</p> |
| <b>From: Lazarus Kairabeb (Nama Traditional Leaders Association)</b><br><b>Date: 26 August 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>Nama Traditional Leaders Association, herewith put to record that we are an interested party having historical ties with not only the park but Shark Island itself and all areas where mass graves are identified through archaeological site discovery.</p> <p>Please contact Mabos Ortman.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Noted</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>From: Manfred Anderson</b><br><b>Date: 01 September 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>Thanks for your reply and prospective registration as an I&amp;AP. I will study the in attached bids received and will soon file some input as I&amp;AP.</p> <p>Looking forward to some positive intervention in these worthwhile projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Noted</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>From: Fritz A Katjiruru (Ovaherero Traditional Authority)</b><br><b>Date: 02 October 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>Your email is well received and forwarded to the relevant office for a reply.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>Noted</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

| Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>From: Lenishwa Engelbrecht</b><br><b>Date: 02 October 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>Thank you for your invitation to NHC to participate in the public consultation process for the Environmental Impact Assessment Study for the Port of Lüderitz / Robert Harbour Expansion, scheduled for 3 October in Lüderitz.</p> <p>Unfortunately, due to a high volume of pre-scheduled and prioritized commitments during this period, and with our limited capacity, NHC will not be able to attend the meeting. Please accept my sincere apologies for the delayed response.</p> <p>We remain interested in the project and its outcomes, and we would appreciate receiving any materials (minutes, reports, presentations) that emerge from the consultation process. Should there be another opportunity for engagement at a later date, please do not hesitate to invite us.</p> <p>Thank you for your understanding.</p> | <p>Noted</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>From: Daniel T Frederick (Manfred Anderson in Copy)</b><br><b>Date: 25 September 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>I wish to register as an interested and affected member of the community in //Kharas Region.</p> <p>Kindly afford me the opportunity to be part of this meeting.</p> <p>Trust that you would not panelize me for late registration. I live in Keetmanshoop and would make the efforts to travel and attend.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>Thank you for your mail and I will definitely register you for the project. You are also more than welcome at the meeting.</p> <p>Looking forward to seeing you there.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>From: Manfred Anderson (Daniel T Frederick in Copy)</b><br><b>Date: 06 October 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>Kindly let me know the date of the meeting and when submissions will be closing.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>The meetings were unfortunately already finalized last week and over the weekend. You are however still welcome to send comments/questions. I would like to finalise the report by latest next week.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>From: Daniel T Frederick (Manfred Anderson in Copy)</b><br><b>Date: 06 October 2025</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <p>This is very much unfortunate as I regarded the meeting as a platform for engagement on issues that are seriously overlooked and in our opinion excluding those who matter and also being denied to be heard.</p> <p>I definitely am definitely disappointed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>It was my impression from your original email, included in the below email trail, that you are aware of the meeting details and the misunderstanding is very unfortunate. I can however guarantee you that we are not excluding anyone or denying anyone to be heard. That is why I have specifically notified, among others, the !Aman TA, the NTLA and the OTA of the environmental assessment process and the meeting details. Once I have finalized the minutes of the meetings, I will circulate it to all registered interested and affected parties. You are then welcome to submit to me, any other aspects that you feel were not addressed, and I can promise you</p> |

| Comments                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                           | <p>that we will take it into consideration and engage with you further, should there be a need. All reports produced during the assessment process will also be shared for your review and comment.</p> <p>I trust that we can still engage in a fruitful manner to hear and address your comments and concerns.</p> |
| <b>From: Daniel T Frederick (Manfred Anderson in Copy)</b><br><b>Date: 07 October 2025</b>                                                                |                                                                                                                                                                                                                                                                                                                      |
| <p>Thank you for your consideration and encouraging. I surely would be happy to receive the minutes.</p> <p>I will definitely have input or comments.</p> | Noted                                                                                                                                                                                                                                                                                                                |

**Hand Delivered Letter Received 03 October 2025****!AMAN TRADITIONAL AUTHORITY**

P.O.BOX 135, Bethanie Namibia:

Tel: 264 63 283 059 / 081 630 6921

[amanauthority@gmail.com](mailto:amanauthority@gmail.com)

October 03, 2025

**!Aman Traditional Authority**

P.O. Box 135  
Bethanie, Namibia  
03<sup>rd</sup> October 2025

To: Dr. André Faul  
Conservation Ecologist  
Geo Pollution Technologies (Pty) Ltd

**Subject: Input on the Environmental Impact Assessment Study for the Proposed Port of Lüderitz Robert Harbour Expansion Project**

Dear Dr. Faul,

On behalf of the !Aman Traditional Authority, we wish to thank you for the invitation to participate in the Public Consultation Process for the Environmental Impact Assessment (EIA) study of the proposed Port of Lüderitz Robert Harbour Expansion Project. We acknowledge the importance of this process in ensuring that environmental, social, and cultural factors are thoroughly considered.

The !Aman Traditional Authority recognizes the potential benefits of the proposed project, including economic development and job creation. At the same time, we respectfully submit the following input for consideration:

**Environmental Concerns:**

Protection of **marine biodiversity and coastal ecosystems** during construction and operation.

Measures to mitigate **noise, dust, and water pollution**, which could affect surrounding communities and natural habitats.

Proper **waste management** strategies to prevent contamination of land and water.

**Social and Community Considerations:**

Potential impacts on **livelihoods of local communities**, particularly those involved in fishing and small-scale commerce.

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Effects on **traffic, safety, and public infrastructure**, which may increase with expanded port operations.

Strategies to ensure that **local communities benefit equitably** from employment and economic opportunities created by the project.

#### **Cultural and Heritage Preservation:**

Safeguarding of **historical, archaeological, and underwater heritage sites**, ensuring that no culturally significant areas are adversely affected.

Consultation with Traditional Authorities and local communities regarding **sites of spiritual or cultural importance**.

#### **Recommendations:**

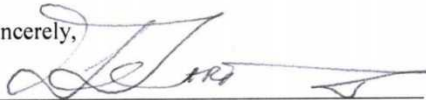
Implementation of robust **monitoring and mitigation plans** throughout the project lifecycle.

Active engagement with the !Aman Traditional Authority and local communities during both construction and operation phases.

Consideration of **project alternatives** that minimize environmental and cultural impacts while maximizing benefits for the local population.

We appreciate the opportunity to provide input and look forward to participating in the upcoming consultation meeting on 03 October 2025 at Turnhalle, Lüderitz.

Thank you for your consideration, and we trust that our concerns will be given due attention in the EIA process.

Yours sincerely, 

**Mr. Johannes Theofilus Swartz**  
For and on behalf of the !Aman Traditional Authority



### Additional Communication

**THE APPROVAL PETITION FOR  
THE !AMAN TRADITIONAL  
AUTHORITY FOR THE EXPANSION OF  
THE ROBERT HARBOUR IN LÜDERITZ  
(!NAMI-#NUS)**

We, the undersigned, respectfully petition NAMPORT for the expansion of the Robert Harbour in LÜDERITZ (!Nami-#Nus). In reference to the engagement held on 08–11 July 2025, the !Aman Traditional Authority witnessed the investigation session carried out on Shark Island. Based on this background, we held clan meetings in Bethanie and Aus where the clan shared the same sentiments with the affected communities and gave us the authorization to approve the expansion of the Robert Harbour in LÜDERITZ (Shark Island).

The !Aman Traditional Authority would like to sincerely apologize if this peaceful demonstration appears as though we do not consider the significance and importance of the foundation of this land and the blood that was shed on this ground.

We stand together with NTTLA and OTA in acknowledging that the matter of the genocide which took place on this ground is not one we take lightly. On the contrary, we honor and respect the sacrifices that were made. The fight for this land during the genocide was a fight for our freedom, our prosperity, and for us as descendants to have land on which we can build a great and prosperous legacy in their honor.

We envision a nation that will make those who died for this cause proud—that they did not die in vain, that all the brutal deaths and murders they endured were not meaningless, but instead gave us the opportunity to live meaningfully on land that honors them.

The !Aman clan, the leaders of our Traditional Authority, and the community at large stand together in writing this petition as direct descendants of those who came before us—those who fought the good fight. We wish to honor this fight by making this soil productive, by unlocking the wealth that is locked up in their bones. The young people and the current generations no longer want to keep these bones silent, but instead ensure that everything

we do honors their hardships and gives glory to God Almighty, who ensured that we were not entirely wiped out, and that those who remained have the privilege to be alive and to continue the rich work entrusted to them. We cannot allow the land to remain idle.

Therefore, it is our mandate and responsibility as the affected descendants of the 1904–1908 Genocide to uplift the communities of LÜDERITZ, Aus, Bethanie, the ||Kharas Region, and Namibia at large. Furthermore, this expansion will create employment, study opportunities for both young and old, and increase the Gross Domestic Product of our economy, while also contributing positively to the international goals of sustainable development.

**In conclusion**, I wish to emphasize that the **!Aman Clan are the rightful custodians of this jurisdiction**, and as such, any development in this area must be carried out in full consultation with the **!Aman Traditional Authority**. Furthermore, I must underscore that the **NTLA and OTA do not** represent the **!Aman Traditional Authority**, nor do they speak on behalf of, or have the mandate of, the

affected descendants of the genocide massacre.

**As descendants of the 1904–1908 Genocide**, our collective desire is that **no one should feel excluded from the Namibian House**.

Recognition, inclusion, and justice must be extended to all, especially those whose histories carry deep scars and who continue to seek dignity and rightful representation.

**I thank You**

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Aman Traditional Authority backs Namport Lüderitz Port Expansion  
(Robert Harbour)

## APPROVE THE EXPANSION OF ROBERT HARBOUR



DATE  
29 AUG 2025

ACTION  
PETITION HAND-OVER TO  
!NAMI-NUS CONSTITUENCY  
COUNCIL, HYPHEN ENERGY &  
NAMPOR

PLACE  
ROBERT HARBOUR  
(Next to Shark

We authorise and support the expansion of the current Robert Harbour Port through quay wall expansion and land reclamation for the benefit of ||Kharas communities, and the whole of Namibia.

### !AMAN CLAN MEMBERS

| NAME                  | SURNAME            | CONTACT NO | SIGNATURE |
|-----------------------|--------------------|------------|-----------|
| 1. HENRIK             | FREDERIK           | 0          |           |
| 2. JOHANNES I.        | SWARTZ             | 0          |           |
| 3. CHRISTOF           | BOOIS              | 03         |           |
| 4. FRANKA             | NASSAUB            | 03         |           |
| 5. ELITA              | GEORGIS            | 01         |           |
| 6. Sanna              | BOOIS              |            |           |
| 7. RING               | WILHELM            | 0          |           |
| 8. RICHARD (KOPPE)    | KOPE               | 03         |           |
| 9. JOHANNES           | FREDERICK          | 03         |           |
| 10. CHRISTINA         | FREDERICK          | 03         |           |
| 11. CHRISTINA         | BOOIS              | 03         |           |
| 12. JACOBUS THOMAS    | WILHELM            | 0          |           |
| 13. Rachel Frederik   | Frederick          | 0          |           |
| 14. Dorothea          | WILHELM            | 0          |           |
| 15. EDUARD            | WILHELM            | 0          |           |
| 16. Magdalena         | Van Rens           | 0          |           |
| 17. Magdalena         | BOOIS              | 0          |           |
| 18. KAPUNA            | BOOIS              | 0          |           |
| 19. LEVIE JACKIE      | BOOIS              | 0          |           |
| 20. David             | Isaacs             | 0          |           |
| 21. Babakka Harste    | Isaacs             | 0          |           |
| 22. Kavan Harste      | Frederick          | 0          |           |
| 23. Gerdie            | Recher             | 0          |           |
| 24. Sonja             | NITSCHKE           | 0          |           |
| 25. Sofia Frederika   | Hause              | 0          |           |
| 26. Gerdie            | Goete              | 0          |           |
| 27. Anna Marike       | Althoff            | 0          |           |
| 28. Elizabeth Vries   | Isaack             | 0          |           |
| 29. Anna M.           | Carum              | 0          |           |
| 30. Maria             | Frederick          | 0          |           |
| 31. Gerdie            | Frederick          | 0          |           |
| 32. Maria Magdalena   | Frederick          | 0          |           |
| 33. Maria F.F.        | Frederick          | 0          |           |
| 34. Hendrina          | Goete              | 0          |           |
| 35. Edlie             | Vries              | 0          |           |
| 36. Anasbaria         | Devoets            | 0          |           |
| 37. Eysanna           | Boois              | 0          |           |
| 38. Maria             | Frederick          | 0          |           |
| 39. Gerdie            | Nghulundua         | 0          |           |
| 40. Ulrica beth       | Goete              | 0          |           |
| 41. Hean Sina         | Van der Westhuyzen | 0          |           |
| 42. Louta             | Boois              | 0          |           |
| 43. Anna Isaack       | Frederick          | 0          |           |
| 44. Hulda B. Frederik | Frederick          | 0          |           |
| 45. Alina Boois       | Boois              | 0          |           |
| 46. Maria Isaack      | Isaacs             | 0          |           |

Privacy Block

|                  |                    |               |                     |             |               |
|------------------|--------------------|---------------|---------------------|-------------|---------------|
| 60) Hilda        | Boetling           | Privacy Block | 97) Dalmatius       | Burgins     | Privacy Block |
| 61) Elisabeth    | Sack               |               | 98) Conradine David | Fredericks  |               |
| 62) Hilda        | Boetling           |               | 99) Joseph Eckardt  | Fredericks  |               |
| 63) Sara Swart   |                    |               | 100) Maria Treck    | Swartboom   |               |
| 64) Fritz        | Van Der Westhuizen |               | 101) Ponce Rammag   | Wiersema    |               |
| 65) Johann Bo    | Boois              |               | 102) Alexander      | Engelbrecht |               |
| 66) Maria        | Meier              |               | 103) Emma Jansen    | Boois       |               |
| 67) Maria        | Vries              |               | 104) Hermann V.     | Fringer     |               |
| 68) Martha       | Ricket             |               | 105) Zella          | Fredericks  |               |
| 69) Sanna        | Boois              |               | 106) Stephanus      | Vries       |               |
| 70) Magdalena J. | Ricket             |               | 107) Corrine        | Isaak       |               |
| 71) Hilda        | Boetling           |               | 108) Johannes       | Boetling    |               |
| 72) Heinrich R.  | Fricker            |               | 109) Johannes       | Smith       |               |
| 73) Luitens      | Hanse              |               | 110) Joseph         | Boois       |               |
| 74) Claudia      | Boois              |               | 111) Johannes Bo    | Boois       |               |
| 75) Katherina    | Boois              |               | 112) Adolph Fricker | Fricker     |               |
| 76) Anna         | Frederick          |               | 113) J. A. Fricker  | Fricker     |               |
| 77) Anna M.      | Frederick          |               | 114) Maria          | Fricker     |               |
| 78) Maria Boois  | Boois              |               | 115) Johann E.      | Fricker     |               |
| 79) ANNE JACOB   | Boois              |               | 116) Maria          | Fricker     |               |
| 80) Maria J.     | Boois              |               | 117) Johann E.      | Fricker     |               |
| 81) Maria J.     | Boois              |               | 118) Maria D.       | Ricket      |               |
| 82) Maria J.     | Boois              |               | 119) Maria          | Boois       |               |
| 83) Maria J.     | Boois              |               | 120) Maria          | Hanse       |               |
| 84) Maria J.     | Boois              |               | 121) Johann         | Hanse       |               |
| 85) Maria J.     | Boois              |               | 122) Maria          | Fricker     |               |
| 86) Maria J.     | Boois              |               | 123) Maria          | Fricker     |               |
| 87) Maria J.     | Boois              |               | 124) Maria          | Fricker     |               |
| 88) Maria J.     | Boois              |               | 125) Maria          | Fricker     |               |
| 89) Maria J.     | Boois              |               | 126) Maria          | Fricker     |               |
| 90) Maria J.     | Boois              |               | 127) Maria          | Fricker     |               |
| 91) Maria J.     | Boois              |               | 128) Maria          | Fricker     |               |
| 92) Maria J.     | Boois              |               | 129) Maria          | Fricker     |               |
| 93) Maria J.     | Boois              |               | 130) Maria          | Fricker     |               |
| 94) Maria J.     | Boois              |               | 131) Maria          | Fricker     |               |
| 95) Maria J.     | Boois              |               | 132) Maria          | Fricker     |               |
| 96) Maria J.     | Boois              |               | 133) Maria          | Fricker     |               |
| 97) Maria J.     | Boois              |               | 134) Maria          | Fricker     |               |
| 98) Maria J.     | Boois              |               | 135) Maria          | Fricker     |               |

|                |        |               |                     |           |               |
|----------------|--------|---------------|---------------------|-----------|---------------|
| 135) Christ    | Kruger | Privacy Block | MRS J. Duncan       | Mr Duncan | Privacy Block |
| 136) Teak      | Kruger |               | 137) Mrs. J. Duncan | Mr Duncan |               |
| 137) Maria     | Kruger |               | 138) Mrs. J. Duncan | Mr Duncan |               |
| 138) Harold M. | Kruger |               | 139) Mrs. J. Duncan | Mr Duncan |               |
| 139) Maria     | Kruger |               | 140) Mrs. J. Duncan | Mr Duncan |               |
| 140) Maria     | Kruger |               | 141) Mrs. J. Duncan | Mr Duncan |               |
| 141) Maria     | Kruger |               | 142) Mrs. J. Duncan | Mr Duncan |               |
| 142) Maria     | Kruger |               | 143) Mrs. J. Duncan | Mr Duncan |               |
| 143) Maria     | Kruger |               | 144) Mrs. J. Duncan | Mr Duncan |               |
| 144) Maria     | Kruger |               | 145) Mrs. J. Duncan | Mr Duncan |               |
| 145) Maria     | Kruger |               | 146) Mrs. J. Duncan | Mr Duncan |               |
| 146) Maria     | Kruger |               | 147) Mrs. J. Duncan | Mr Duncan |               |
| 147) Maria     | Kruger |               | 148) Mrs. J. Duncan | Mr Duncan |               |
| 148) Maria     | Kruger |               | 149) Mrs. J. Duncan | Mr Duncan |               |
| 149) Maria     | Kruger |               | 150) Mrs. J. Duncan | Mr Duncan |               |
| 150) Maria     | Kruger |               | 151) Mrs. J. Duncan | Mr Duncan |               |
| 151) Maria     | Kruger |               | 152) Mrs. J. Duncan | Mr Duncan |               |
| 152) Maria     | Kruger |               | 153) Mrs. J. Duncan | Mr Duncan |               |
| 153) Maria     | Kruger |               | 154) Mrs. J. Duncan | Mr Duncan |               |
| 154) Maria     | Kruger |               | 155) Mrs. J. Duncan | Mr Duncan |               |
| 155) Maria     | Kruger |               | 156) Mrs. J. Duncan | Mr Duncan |               |
| 156) Maria     | Kruger |               | 157) Mrs. J. Duncan | Mr Duncan |               |
| 157) Maria     | Kruger |               | 158) Mrs. J. Duncan | Mr Duncan |               |
| 158) Maria     | Kruger |               | 159) Mrs. J. Duncan | Mr Duncan |               |
| 159) Maria     | Kruger |               | 160) Mrs. J. Duncan | Mr Duncan |               |
| 160) Maria     | Kruger |               | 161) Mrs. J. Duncan | Mr Duncan |               |
| 161) Maria     | Kruger |               | 162) Mrs. J. Duncan | Mr Duncan |               |
| 162) Maria     | Kruger |               | 163) Mrs. J. Duncan | Mr Duncan |               |
| 163) Maria     | Kruger |               | 164) Mrs. J. Duncan | Mr Duncan |               |
| 164) Maria     | Kruger |               | 165) Mrs. J. Duncan | Mr Duncan |               |
| 165) Maria     | Kruger |               | 166) Mrs. J. Duncan | Mr Duncan |               |
| 166) Maria     | Kruger |               | 167) Mrs. J. Duncan | Mr Duncan |               |
| 167) Maria     | Kruger |               | 168) Mrs. J. Duncan | Mr Duncan |               |
| 168) Maria     | Kruger |               | 169) Mrs. J. Duncan | Mr Duncan |               |
| 169) Maria     | Kruger |               | 170) Mrs. J. Duncan | Mr Duncan |               |
| 170) Maria     | Kruger |               | 171) Mrs. J. Duncan | Mr Duncan |               |
| 171) Maria     | Kruger |               | 172) Mrs. J. Duncan | Mr Duncan |               |
| 172) Maria     | Kruger |               | 173) Mrs. J. Duncan | Mr Duncan |               |
| 173) Maria     | Kruger |               | 174) Mrs. J. Duncan | Mr Duncan |               |
| 174) Maria     | Kruger |               | 175) Mrs. J. Duncan | Mr Duncan |               |
| 175) Maria     | Kruger |               | 176) Mrs. J. Duncan | Mr Duncan |               |
| 176) Maria     | Kruger |               | 177) Mrs. J. Duncan | Mr Duncan |               |
| 177) Maria     | Kruger |               | 178) Mrs. J. Duncan | Mr Duncan |               |
| 178) Maria     | Kruger |               | 179) Mrs. J. Duncan | Mr Duncan |               |
| 179) Maria     | Kruger |               | 180) Mrs. J. Duncan | Mr Duncan |               |
| 180) Maria     | Kruger |               | 181) Mrs. J. Duncan | Mr Duncan |               |
| 181) Maria     | Kruger |               | 182) Mrs. J. Duncan | Mr Duncan |               |
| 182) Maria     | Kruger |               | 183) Mrs. J. Duncan | Mr Duncan |               |
| 183) Maria     | Kruger |               | 184) Mrs. J. Duncan | Mr Duncan |               |
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| 185) Maria     | Kruger |               | 186) Mrs. J. Duncan | Mr Duncan |               |
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| 191) Maria     | Kruger |               | 192) Mrs. J. Duncan | Mr Duncan |               |
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| 197) Maria     | Kruger |               | 198) Mrs. J. Duncan | Mr Duncan |               |
| 198) Maria     | Kruger |               | 199) Mrs. J. Duncan | Mr Duncan |               |
| 199) Maria     | Kruger |               | 200) Mrs. J. Duncan | Mr Duncan |               |

**From: Nama Traditional Leaders Association**

**Received via E-Mail: 26 January 2026**

| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <p><b>ENVIRONMENTAL IMPACT ASSESSMENT (EIA) FOR THE PROPOSED PHASE 1 LAND RECLAMATION AND PORT EXPANSION AT LÜDERITZ - FORMAL OBJECTION BY THE NAMA TRADITIONAL LEADERS ASSOCIATION</b></p> <p>We write in response to the Environmental Impact Assessment (EIA) for the proposed Phase 1 land reclamation and port expansion in Lüderitz, and further to previous submissions made by the Nama Traditional Leaders Association (NTLA).</p> <p>This letter formally reiterates and substantiates, in greater detail, the NTLA’s unequivocal position: the proposed port expansion must not proceed in the vicinity of Shark Island and its surrounding waters.</p> <p>Despite the scale, permanence, and extreme sensitivity of the proposed development, the EIA fails to engage with the project’s most fundamental and non-mitigable impact: Shark Island and its surrounding waters as a site of genocide, mass burial, and enduring cultural, spiritual, and environmental heritage for the Nama people. The EIA treats Shark Island as a technical constraint rather than as a living landscape of ancestral harm, remembrance, and obligation.</p> <p>This failure constitutes a violation of the collective rights of the Nama people as Indigenous peoples, including their right to self-determination and their right to freely decide how sites of ceremonial, historical, and spiritual significance, particularly a former genocidal concentration camp are protected, managed, and commemorated.</p> | <p>The opening section of the letter is noted and is addressed as part of the comments provided for items 1 to 7 below.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>1. Fundamental flaws in the underwater archaeological assessment</b></p> <p>The underwater archaeological assessment is conceptually, methodologically, and ethically deficient. Its central premise that the absence or non-confirmation of discrete, identifiable human remains would mitigate heritage concerns is fundamentally flawed.</p> <p>Historical, archival, and oral evidence is unequivocal: large numbers of Nama and Ovaherero people who perished at Shark Island were thrown into the sea or walked into the water in desperation to escape the conditions of the concentration camp. The surrounding waters are therefore not adjacent to heritage; they are themselves a burial site and mass grave.</p> <p>The EIA acknowledges high turbidity, strong currents, and severe seabed disturbance, yet paradoxically relies on these very conditions to justify a narrow and inconclusive archaeological survey.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p>The underwater archaeological assessment was conducted by a very competent and impartial, international maritime archaeology specialist. The statement “<b>[the underwater archaeological assessment]</b> <b>concludes that the absence of human remains is a false conclusion drawn from the report.</b></p> <p>The report clearly state:</p> <p>“<b>[the underwater archaeological assessment]</b> <b>concludes that the absence of human remains is a false conclusion drawn from the report.</b></p> <p><b>Despite this, the rocky areas near the shoreline—particularly the bay adjacent to where prisoners were held—may contain buried</b></p> |

[illegible]

| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                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| <p>infrastructure project irrespective of the severity or irreversibility of its harms.</p> <p>The EIA further fails to acknowledge that Shark Island has already been subjected to extensive historical alteration through prior land reclamation and infrastructure development, including reclamation undertaken by Nampont in the early 1990s. Research by Forensic Architecture and Forensis demonstrates that the present-day size, shape, and surface of Shark Island do not reflect its form during the period of the concentration camp. Significant portions of the island were terraformed, infilled, reshaped, and physically connected to the mainland, resulting in the destruction or burial of material traces of incarceration and killing.</p> <p>Notably, this research confirms that existing port infrastructure occupies land that once formed part of the concentration camp landscape, contradicting the EIA’s implicit treatment of Shark Island as a bounded heritage site external to port operations.</p> <p>Against this backdrop, the EIA’s reliance on the island’s current footprint as a baseline for impact assessment is fundamentally flawed. By failing to recognise cumulative and irreversible harm already inflicted, the EIA reproduces a logic of erasure rather than mitigation and undermines its credibility as a good-faith heritage assessment.</p> | <p>the complete EIA. However, its focus is on the onshore environment and not offshore where the development takes place. The onshore environment is considered as stated above and the fact that a terrestrial archaeology assessment was commissioned is proof of that. The underwater archaeological study specifically reference Forensis and Forensic Architecture’s report in a section titled “<span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: #cccccc;"> </span><span style="background-color: 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| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <p>executions carried out in full view of the town, refuting claims of ignorance regarding the genocide.</p> <p>Nama rituals such as //Goa #Nobos, conducted at sunrise facing east, rely on unobstructed relationships between sea, horizon, wind, and sound. Industrial port infrastructure within this field constitutes a direct violation of Nama spiritual practices.</p>                                                                                                                                                                                                                         | <p>association. Neither has any input or communication been received from the OTA, who the NTLA and Forensis and Forensic Architecture include in their communication as having the same views as themselves.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><b>4. Failure to recognise intangible, spiritual, and relational heritage</b></p> <p>The EIA's heritage framework is incompatible with Indigenous understandings of land, sea, and memory. Shark Island is a relational landscape constituted through visual, sonic, atmospheric, spiritual, and historical relationships extending well beyond its present footprint.</p> <p>The proposed 20-metre buffer zone is conceptually meaningless and fails to protect this continuity. The expansion would permanently sever these relationships and represent the culmination of decades of erasure.</p> | <p>In a previous letter received from Forensis and Forensic Architecture, certain demands were made. These are presented here with comments to the demands in brackets:</p> <p>“NTLA, OTA, FA and Forensis strongly object to the planned construction activity. We demand:”</p> <p>“1. An immediate and permanent moratorium on all construction whether on top of or in direct vicinity of Shark Island.” <b>((The boundaries of direct vicinity is vague and clearly left open for own interpretation. Furthermore, no construction activities have occurred on or next to Shark Island, save for projects within the existing commercial harbour.))</b></p> <p>“2. A holistic, non-invasive, archaeological study of the entire area of Shark Island and its vicinity, including the surrounding seabed, which constitutes a burial place for many victims of the genocide.” <b>(These have been commissioned and are included in the environmental assessment. International experts with extensive experience in their respective fields have been used.)</b></p> <p>“3. Preservation of Shark Island as a Heritage Site in the true meaning of the term, as well as related burial places.” <b>(This is a recommendation of the environmental assessment.)</b></p> <p>“The undersigned parties request that the following concrete demands be met:”</p> <p>“4. The development of an alternative plan for the Phase 2 expansion of the Lüderitz Port, as required under the Environmental Management Act and informed by the outcomes of the environmental impact assessment, to be shared with the above parties.” <b>(Alternatives have been considered and are presented in section 7. Based on this alternative assessment, two options were designated as no-go alternatives due to their impact on Shark Island. Even the current location for development which is one of the alternatives in Figure 7-1, was changed to be completely offshore instead of the original onshore component, in order to limit impacts on Shark Island. The environmental assessment states: “some options like Option 2 and 3 in Figure 7 1 are not considered feasible due to the impact it will have on Shark Island, a site of National Heritage Importance. Similarly, Option 1 as presented in Figure 7 1, is also no longer feasible due to the</b></p> |

| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p><i>proposed extent of onshore development encroaching on Shark Island.)”</i></p> <p>“5. NTLA and OTA to be included in all forthcoming consultation processes pertaining to this development, in line with international human rights law protecting the rights of indigenous and tribal peoples.” <b>(The NTLA and OTA have been included in all public participation notifications since the commissioning of the project specific environmental assessment in early 2025. They have been allowed the opportunity to provide information, concerns and input and to attend a meeting specifically arranged to meet with them, the National Heritage Council, the Regional Council, the Town Council and Namport).</b></p> <p>“6. The full and up to date report on the environmental and cultural impacts of the project be sent to the signed parties.” <b>(The reports were shared on 17 December 2026 and review and commenting on the reports were allowed until 26 January 2026.)</b></p> <p>“7. A representative of Namport to attend an event organised by NTLA and OTA in April 2024 in Lüderitz – details will be provided in an invitation to follow.” <b>(Namport attended the meeting.)</b></p>                                                                                      |
| <p><b>5. Absence of Free, Prior, and Informed Consent (FPIC)</b></p> <p>The Nama people have never given Free, Prior, and Informed Consent to this development, as required under the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Namibian Constitution.</p> <p>Consultation occurred only after key project decisions had already been taken and cannot be characterised as consent. Treating the NTLA as merely an “interested and affected party” mischaracterises its status as an Indigenous rights-holding authority and as the representative body of descendants of genocide victims</p> | <p>The environmental assessment was conducted in terms of the Environmental Management Act of 2007 and its Regulations of 2012. The term “Interested and Affected Party” is the standard term defined and used in the Act and Regulations to refer to all consulted parties. Furthermore, the environmental impact assessment process is the tool used to engage with all interested and affected parties regarding a listed activity that requires assessment. The term interested and affected party does thus not undermine any party, whether it be an indigenous peoples or a minister in the public sector.</p> <p>We are not aware of any key decisions that have been taken or any approvals that have been obtained for the proposed development. Disclosure of information about risks and impacts, which is the role of the environmental assessment process, is required prior to, and in order to obtain, FPIC. The environmental assessment is thus a tool used to inform and engage with interested and affected parties, including indigenous people, and to assess a specific project, plan or programme. To do this assessment, you will then of course need some information regarding what is planned for the project. This does not mean these plans are final and approved.</p> |
| <p><b>6. The EIA failed to address the Socio-economic and Cultural rights</b></p> <p>The EIA is non-exhaustive in that it fails to address the undisclosed 2011 feasibility study and a previous rejection by the Heritage Council. It further neglects</p>                                                                                                                                                                                                                                                                                                                                                                          | <p>The feasibility study is not an undisclosed study. It is unfortunate that the NTLA, save for a legal representative, did not attend the meeting specifically arranged to engage with the traditional, regional and local authorities in Lüderitz, regarding the proposed development. The feasibility study’s alternatives were addressed at this meeting and in many previous</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <p>to rationalise its findings in light of the structural designs proposed for the port expansion.</p> <p>Despite the evident adverse environmental impacts, the EIA fails to engage with the economic, social, and cultural rights of the communities represented by the NTLA. These rights are integral to human dignity and include, inter alia, compensation for surface rights and meaningful engagement regarding contractual benefits, set-asides, or alternative compensation mechanisms.</p> <p>Furthermore, the EIA is impermissibly divisive in that it fails to acknowledge, or actively suppresses, the NTLA’s jurisdiction over ancestral land in the //Kharas Region, arising from customary law and long-established Indigenous governance systems.</p> <p>The uncompensated loss of these rights includes:</p> <ol style="list-style-type: none"> <li>6.1 The //Kharas Region, including Shark Island and its subsoil; and</li> <li>6.2 The territorial sea adjacent to the coast, including its seabed, subsoil, associated resources, and the airspace above its land and territorial sea.</li> </ol> | <p>studies. The alternative locations of the feasibility study are also incorporated into this report (Figure 7-1). Furthermore, no application by the Proponent was made with the Heritage Council for consent for the project. Their previous rejection was thus premature and of no-relevance. They have not received all documentation and studies to fairly evaluate the project and reach an objective conclusion.</p> <p>The EIA does not [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED].</p> <p>Compensation for surface rights and meaningful engagement regarding contractual benefits, set-asides, or alternative compensation mechanisms are mentioned. The area earmarked for development is within offshore waters that have been placed under jurisdiction of Namport for decades. The statement that compensation for surface rights and meaningful engagement regarding contractual benefits, set-asides, or alternative compensation mechanisms are required for this particular development (even for the “airspace above”), infers that for each and every development within the //Kharas Region, whether it be development of a shopping centre in Keetmanshoop, or a residential house in Lüderitz, compensation for surface rights and meaningful engagement regarding contractual benefits, set-asides, or alternative compensation mechanisms are required.</p> <p>At no point does the EIA fail to acknowledge Traditional Authorities. It does however not recognise the NTLA as having jurisdiction over ancestral land since the NTLA is an association and not the Traditional Authority. Furthermore, the !Aman Traditional Authority, is the custodian of the Lüderitz area. This has also been confirmed by the representative of the NTLA to the public meetings in Lüderitz. The !Aman have been engaged with and have attended the public meetings in Lüderitz.</p> |
| <h3>7. Clear position and demand</h3> <p>The NTLA reiterates its position that the proposed Lüderitz port expansion constitutes an existential threat to Shark Island as a site of genocide remembrance.</p> <p>The NTLA formally demands that Namport halt the proposed expansion and cease all related reclamation, dredging, and construction activities in and around Shark Island and its surrounding waters.</p> <p>Alternatively, the NTLA calls upon Namport to pursue accommodation and common ground through good-faith, substantive engagement on compensation for surface rights and related compensatory and reparative measures, including meaningful and enforceable contractual set-asides for communities under the auspices of the NTLA.</p>                                                                                                                                                                                                                                                                                                                                                           | <p>The [REDACTED] is noted and are addressed in the responses provided above. It is however again stated that the !Aman Traditional Authority, is the custodian of the Lüderitz area. This has also been confirmed by the representative of the NTLA to the public meetings in Lüderitz. To quote from the minutes of the meeting held on 03 October 2026 as accepted by the attendees of the meeting as being an accurate representation of the meeting:</p> <p>Mr. Lucius Murorua, representing the NTLA, acknowledged that there is <b>overall positive feedback</b> from the community and that they <b>embrace the project</b>. He further stated that he was asked by the NTLA to observe the proceedings of the meetings and he is <b>happy that the custodians of the land [the !Aman] are present and that they have a positive sentiment towards the project</b>. He also reiterated the importance of the LTC to provide input on the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Comment                                                                                                                                                                                                                                                                                   | Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                                                                                                                                                                                                                                                                                           | <p>aesthetics when the designs are finalised in order to preserve the memory of Shark Island. He said <b>society has to move forward, but communities must not be alienated</b>. He said he is happy, he <b>has seen the positive sentiment towards the project</b> with his own eyes. He mentioned the <b>!Aman is the custodians of the land and as such they are also the “owners” of Namport which is a national asset</b>. He further noted that all aspects of the project must be harmonized in order move forward in a unified manner.</p> <p>It furthermore seems as if compensation will resolve the problems posed by the NTLA. This in itself is a major concern and places a question mark on the real objectives of the NTLA objections.</p> |
| <p>Please find attached to this submission:</p> <p>Forensic Architecture Report<br/> Namport CEO Letter<br/> National Heritage Council Rejection Letter</p> <p>Failure to do so will compel the NTLA to pursue national and international legal, heritage, and human rights remedies.</p> | <p>Attachments included in Appendix G.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## Clarification from Maritime Archaeologist



### CONTRACT MARITIME ARCHAEOLOGIST Vanessa Maitland

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Privacy Block

**Date:** 03 February 2025

**Re:** Response to concerns regarding the Underwater Heritage Impact Assessment for the Namport Quay Extension

Thank you for the submission outlining concerns regarding the Underwater Heritage Impact Assessment (UHIA) undertaken for the proposed Namport Quay Extension at Shark Island, Lüderitz. The historical suffering and loss endured by Nama and Ovaherero people at Shark Island are well documented and are fully acknowledged as part of the broader Environmental Impact Assessment context.

The UHIA was commissioned as a specialist technical study in support of the EIA process, with the specific purpose of assessing the likelihood of encountering underwater cultural heritage resources within the defined development footprint. It was not intended, nor is it able, to determine historical truth, adjudicate questions of genocide, or assess moral or memorial significance. These matters are established through historical, archival, and oral sources and fall within the remit of heritage governance and policy, rather than archaeological method.

The assessment identifies the marine environment surrounding Shark Island as highly dynamic, characterised by strong currents, high turbidity, mobile sediments, and extensive biological activity. These conditions significantly reduce the probability that discrete, identifiable human remains would survive in a recoverable form over extended periods, particularly in the absence of rapid burial in anaerobic conditions. This conclusion is based on well-established principles of marine taphonomy and does not negate the historical reality of deaths that occurred at or near the site.

To avoid any potential misinterpretation, the Summary of the UHIA has been clarified to state explicitly that the absence of recoverable archaeological evidence must not be interpreted as evidence of absence or as an indication of lack of heritage significance. Non-recovery reflects environmental processes and methodological limitations inherent to underwater archaeology. Accordingly, the assessment identifies rocky nearshore areas and sheltered inlets as zones of higher archaeological potential and recommends precautionary management measures should any material of potential heritage significance be encountered during development activities.

The buffer zones and management measures proposed in the UHIA are practical heritage management tools, developed in accordance with current professional standards, to guide monitoring and response during construction. They are not intended to define the spatial or conceptual limits of historical memory, cultural significance, or memorial recognition. In the

event that archaeological material or human remains are encountered, work would cease and the appropriate heritage authorities would be notified in accordance with applicable legislation and established protocols.

The concern raised that the waters surrounding Shark Island form part of a broader memorial or burial landscape associated with the colonial-era concentration camp is recognised as serious and significant. However, the formal recognition and management of such landscapes extend beyond the scope of a Phase 1 Underwater Heritage Impact Assessment and fall within the mandate of the relevant heritage authorities and decision-making bodies. These matters are more appropriately addressed through heritage policy, stakeholder consultation, and the EIA decision-making process.

The UHIA was undertaken in good faith, in accordance with professional and ethical standards, and with due recognition of the sensitivity of the site. It does not deny historical events, nor does it seek to diminish their significance. Its role is technical and precautionary, and it should be read and applied within that context.

Yours sincerely,

Vanessa Maitland  
Maritime Archaeologist  
ASAPA No. 326

## **Appendix G    Other Correspondence and Documentation**

**Additional Communication and Correspondence Received in Relation to the Port  
Expansion Project**

**Petition in Favour of Port Expansion: 06 November 2025**

Ruth Sheendelwako

Petition Initiator – Lüderitz Residents Support the Port Expansion

Lüderitz,

Namibia

06 November 2025

To:

The Chief Executive Officer

Namibia Ports Authority Namport

Walvis Bay

Namibia

Cc:

Geo Pollution Technologies (EIA Consultants);

Ministry of Environment, Forestry and Tourism;

Office of the Governor – //Karas Region;

Office of the Chief –! Aman Traditional Authority (Bethanie);

Lüderitz Town Council

Subject: Submission of Petition – Lüderitz Residents Support the Port Expansion

Dear Sir,

On behalf of the residents of Lüderitz, I hereby submit the attached petition and online signatures in support of Namport's proposed expansion of the Port of Lüderitz (Robert Harbor).

Our community supports this development, provided it remains guided by responsible environmental management, transparency, and continued inclusion of Lüderitz residents in the process. We commend Namport's commitment to a comprehensive Environmental Impact Assessment (EIA) as part of ensuring sustainable growth.

This petition signed online reflects the collective voice of Lüderitz residents and supporters who believe that progress and preservation can go hand in hand.

Thank you for your leadership and continued engagement with the community.

Yours sincerely,

Ruth Sheendelwako

Petition Initiator

On behalf of the Residents of Lüderitz and Supporters

Cell: +264812880582

[kepawaruth@gmail.com](mailto:kepawaruth@gmail.com)



**Petition**

**07 October 2025**

**Luderitz , Namibia**

**Theme 'Lüderitz Residents Support Responsible Port Expansion and Environmental Preserving Our Heritage While Building Our Future'**

To: The Chief Executive Officer

Namibia Ports Authority (Namport)

Cc: Geo Pollution Technologies (EIA Consultants); Ministry of Environment, Forestry and Tourism; Office of the Governor //Karas Region; Office of the Chief !Aman Traditional Authority (Bethanie) ; Lüderitz Town Council

**Petition Statement**

We, the undersigned residents of Lüderitz, wholeheartedly support the proposed expansion of the Port of Lüderitz (Robert Harbor). Our support is anchored in the understanding that the expansion of the port be guided by the current principles and guidelines that aim to preserve and protect, while advocating for economic progress.

**Background**

Lüderitz stands as one of Namibia's oldest and most historically significant coastal towns, a living testament to resilience, diversity, and the enduring relationship between people and sea. Our fishing industry, tourism, and new energy opportunities have made Lüderitz a focal point for Namibia's sustainable growth.

However, growth must always be guided by knowledge, participation, and environmental responsibility. That is why we commend Namport's decision to commission a comprehensive EIA before expanding the port ensuring that development aligns with our environmental obligations and community aspirations.

We the residents of Luderitz support the call by the Chief of the Aman Traditional Authority (Bethanie) who urged all Namibians to participate actively and lend their voices to this process. His call reinforces that this project is not for a few, but for the collective benefit of Namibia.

**We therefore Recommend the following - Our Commitments and Requests**

- We support Namport's EIA process — as a proactive measure to assess, prevent, and manage any potential environmental or social impacts associated with the port expansion.
- We affirm that Lüderitz's heritage is not being destroyed. Instead, the assessments ensure that our town's unique identity, its architecture, marine environment, cultural significance is preserved and integrated into future development.
- We call for continued transparency and inclusion of the Lüderitz residents, fisherfolk, youth, and business owners should continue to be informed and included in decision-making and progress updates.

- We request opportunities for skills development and employment for the Karas residents. As part of this project, Namport and partners should priorities local training, job creation, and procurement to empower Lüderitz residents and ensure long-term community benefits.
- We support collaboration between Namport, Geo Pollution Technologies, and the !Aman Traditional Authority. This partnership demonstrates respect for both traditional leadership and local governance, and ensures that the process benefits the wider Namibian community.
- While we remain committed to conducting the Environmental Impact Assessment (EIA) responsibly and sustainably, we express our support for the proposed port expansion. We believe this initiative is a necessary step forward and one that promises to stimulate economic growth, strengthen key sectors, and create much-needed employment opportunities for our communities. Progress and sustainability can go hand in hand, and we the Luderitz residents advocate for a future that balances both.

#### **Our Vision**

This petition reflects our collective belief that Lüderitz can be a national model for how development, environmental care, and heritage preservation can work hand in hand. The expansion of the Port of Lüderitz, represents a rare opportunity to modernize our economy without compromising the character of our beloved town.

#### **Call to Action**

We, the residents of Lüderitz and concerned Namibians, encourage everyone to sign this online petition to show their support for responsible development. Together, let us ensure that Lüderitz continues to thrive as a beacon of Namibia's maritime history, and as a forward-looking town ready to embrace a sustainable and inclusive future.

#### **Signed by:**

The Residents of Lüderitz and Supporters Nationwide

| Name                                      | City                | State | Postal Code | Country | Signed On  |
|-------------------------------------------|---------------------|-------|-------------|---------|------------|
| Ruth Sheendelwako                         | Rosh                | Pinah |             | Namibia | 2025-10-07 |
| Tresia Menette Shikwamanga                | Windhoek            |       |             | Namibia | 2025-10-07 |
| Scharlotte Kotze                          | Windhoek            |       |             | Namibia | 2025-10-07 |
| Venomusheko Mununga                       |                     |       |             | Namibia | 2025-10-07 |
| Manuel Kadhikwa                           |                     |       |             | Namibia | 2025-10-07 |
| Shipola Maria Shihepo                     | Oshikango           |       |             | Namibia | 2025-10-07 |
| Carol Van Wyk                             |                     |       |             | Namibia | 2025-10-07 |
| MARTIN PETRUS                             |                     |       |             | Namibia | 2025-10-07 |
| Brigitte Fredericks Fredericks            |                     |       |             | Namibia | 2025-10-07 |
| Erastus Angula                            | Windhoek            |       |             | Namibia | 2025-10-07 |
| Lee Garises                               |                     |       |             | Namibia | 2025-10-07 |
| Josephat Ashipala                         |                     |       |             | Namibia | 2025-10-07 |
| Zyndall Jansen                            | Walvis Bay/Luderitz |       |             | Namibia | 2025-10-07 |
| Hellena Eelu                              |                     |       |             | Namibia | 2025-10-07 |
| Simon Natangwe                            |                     |       |             | Namibia | 2025-10-07 |
| Frieda Taati Ndunga                       | Keetmanshoop        |       |             | Namibia | 2025-10-07 |
| Abraham Elifas                            |                     |       |             | Namibia | 2025-10-07 |
| Antonio Max                               |                     |       |             | Namibia | 2025-10-07 |
| Emilia Theophelus                         |                     |       |             | Namibia | 2025-10-07 |
| Pewa Gebhard                              | Windhoek            |       |             | Namibia | 2025-10-07 |
| Lusia Namwoongo                           | Windhoek            |       |             | Namibia | 2025-10-07 |
| Moses Shatoolwa                           |                     |       |             | Namibia | 2025-10-07 |
| Lusia Nghaamwa                            |                     |       |             | Namibia | 2025-10-07 |
| Moses Kapolo                              |                     |       |             | Namibia | 2025-10-07 |
| Dina Stanley                              | Luderitz            |       |             | Namibia | 2025-10-07 |
| Mariam Njenjema                           |                     |       |             | Namibia | 2025-10-07 |
| Ruben Mwakondjele                         |                     |       |             | Namibia | 2025-10-07 |
| Kapenauarue Siririka                      | Windhoek            |       |             | Namibia | 2025-10-07 |
| Loide Shekunyenge                         |                     |       |             | Namibia | 2025-10-07 |
| Letisiya Jona                             |                     |       |             | Namibia | 2025-10-07 |
| Sonia Musungu                             | Windhoek            |       |             | Namibia | 2025-10-07 |
| Ndalelwa Daniels                          | Windhoek            |       |             | Namibia | 2025-10-07 |
| Ndjoroka Tjipepa                          | Windhoek            |       |             | Namibia | 2025-10-07 |
| Maurenchia Kruger                         | Windhoek            |       |             | Namibia | 2025-10-07 |
| Penny Hekandjo                            | Ludrets             |       |             | Namibia | 2025-10-07 |
| Ricardo De Freitas                        |                     |       |             | Namibia | 2025-10-07 |
| Suzette Weyers                            |                     |       |             | Namibia | 2025-10-07 |
| Antonius Ziita                            |                     |       |             | Namibia | 2025-10-07 |
| Ndako Amakali                             | Windhoek            |       |             | Namibia | 2025-10-07 |
| Jessica Kruger                            | Oranjemund          |       |             | Namibia | 2025-10-07 |
| Ndakalako Ndesihafela Sabhina Shikwamanga | Swakopmund          |       |             | Namibia | 2025-10-07 |
| Teresia Nande                             | Windhoek            |       |             | Namibia | 2025-10-07 |
| Kavela Eunike Kaunapawa                   |                     |       |             | Namibia | 2025-10-07 |
| Gillence Fillemon                         | Windhoek            |       |             | Namibia | 2025-10-07 |
| Norman Nendongo                           |                     |       |             | Namibia | 2025-10-07 |
| Elizabeth Justus                          | Windhoek            |       |             | Namibia | 2025-10-07 |

Jefta-Fiji TshilongoSwakopmund""Namibia2025-10-07  
 Ndapunikwa Heita""""Namibia2025-10-07  
 Johannes Mbombo""""Namibia2025-10-07  
 Balbina Kleopas""""Namibia2025-10-07  
 Johannes Kandjumbi""""Namibia2025-10-07  
 Kleopas NekundiWindhoek""Namibia2025-10-08  
 Ndeyawana AludiluWindhoek""Namibia2025-10-08  
 Reimo MunyandiWindhoek""Namibia2025-10-08  
 Thabo Clement MonchoOshikango""Namibia2025-10-08  
 SHEATIEL SHIFELENILüderitz""Namibia2025-10-08  
 Martha Petrus""""Namibia2025-10-08  
 Henry Van Taak""""Namibia2025-10-08  
 Jesaya Hauwanga""""Namibia2025-10-08  
 Petrus Siloka""""Namibia2025-10-08  
 Gillian NatanaelWindhoek""Namibia2025-10-08  
 MARIA Katutu""""Namibia2025-10-08  
 Michelle Dausab""""Namibia2025-10-08  
 Bessly Johnas Makaula""""Namibia2025-10-08  
 Linda Mouton""""Namibia2025-10-08  
 Karolina Daniel""""Namibia2025-10-08  
 Jaqueline De Klerk""""Namibia2025-10-08  
 Elvira De KlerkWindhoek""Namibia2025-10-08  
 Rakel MakaulaRosh Pinah""Namibia2025-10-08  
 Oleandre JanuaryOranjemund""Namibia2025-10-08  
 Christeline MostertKeetmanshoop""Namibia2025-10-08  
 Jennifer Van Wyk""""Namibia2025-10-08  
 Kleopas SekupeWindhoek""Namibia2025-10-08  
 Clyden Swartz""""Namibia2025-10-08  
 Jacky HarrisLüderitz""Namibia2025-10-08  
 Andre De KlerkWindhoek""Namibia2025-10-08  
 Moller Frieda""""Namibia2025-10-08  
 Theresia FrederickdSwakopmund""Namibia2025-10-08  
 Jerome Maarman""""Namibia2025-10-08  
 Victoria NdjebelaWindhoek""Namibia2025-10-08  
 Graciano JahsOshikango""Namibia2025-10-08  
 Sheridan WÜRMS""""Namibia2025-10-08  
 Gustaf UyumbaWindhoek""Namibia2025-10-08  
 Immanuel Dennis Angula Shitula""""Namibia2025-10-08  
 Ngeendina ItilaLüderitz""Namibia2025-10-08  
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 Linus Ashipala Leopold""""Namibia2025-10-08  
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 Florence Louw""""Namibia2025-10-08  
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 Martha Van Rooyen""""Namibia2025-10-08

Franco Pieters""Namibia2025-10-08  
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 André Kiel""Namibia2025-10-08  
 Jean TangeniWindhoek""Namibia2025-10-08  
 Tracy-Lee Davids""Namibia2025-10-08  
 ERIC PANDULENI DANIEL AMISS""Namibia2025-10-08  
 Henock HamakaliOranjemund""Namibia2025-10-08  
 Hershley van Wyk""Namibia2025-10-08  
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 Carolina CiprianoWindhoek""Namibia2025-10-08  
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 Vernon Fredericks""Namibia2025-10-08  
 Merle Pickering""Namibia2025-10-08  
 Laura VictorWalvis bay Narraville""Namibia2025-10-08  
 Melanie MartinLuderitz""Namibia2025-10-08  
 Melzedeck Hammond""Namibia2025-10-08  
 Tilainge Ndaniela Hitewa""Namibia2025-10-08  
 Natanael Tobias""Namibia2025-10-08  
 Caroline Thomas""Namibia2025-10-08  
 Wilbur Pickering""Namibia2025-10-08  
 Moses ZithaWindhoek""Namibia2025-10-08  
 Edith Carelse""Namibia2025-10-08  
 Barnard Hendriks""Namibia2025-10-08  
 Glenn RispelMariental""Namibia2025-10-08  
 Elizabeth Tataleni""Namibia2025-10-08  
 Oliver Mwiya""Namibia2025-10-08  
 Elishiya Mwiya""Namibia2025-10-08  
 Cameron Farmer""Namibia2025-10-08  
 Rosalia Lunguti""Namibia2025-10-08  
 Ingvar Jökulsson""Namibia2025-10-08  
 Petrus Hi""Namibia2025-10-08

Zayne Beukes""""Namibia2025-10-08  
 Anitha Shipanga""""Namibia2025-10-08  
 Lucia ndakundana Shalyefu""""Namibia2025-10-08  
 Sigrun Jokulsson""""Namibia2025-10-08  
 Benyamen Amon""""Namibia2025-10-08  
 Ranlen Visagie""""Namibia2025-10-08  
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 Sheya Nekayi""""Namibia2025-10-08  
 Praylean Bampton""""Namibia2025-10-08  
 Godfrey Mawetu""""Namibia2025-10-08  
 Jeandre Farmer""""Namibia2025-10-08  
 Randell Ralph VisagieWindhoek""Namibia2025-10-08  
 Beatrics Ambunda""""Namibia2025-10-08  
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 Roelene VisagieWindhoek""Namibia2025-10-08  
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 Shanid van WykLuderitz""Namibia2025-10-08  
 Shamila PlaatjeOshikango""Namibia2025-10-08  
 Vicky-Lee HerculesLüderitz""Namibia2025-10-09  
 Reginald JONKERSOranjemund""Namibia2025-10-09  
 Errol Plaatje""""Namibia2025-10-09  
 Gerald Boois""""Namibia2025-10-09  
 Penda please Frans""""Namibia2025-10-09  
 Nadeen Eliakim""""Namibia2025-10-09  
 Belinda Schmidt""""Namibia2025-10-09  
 Peter Johannes""""Namibia2025-10-09  
 Josef IlifavaliOranjemund""Namibia2025-10-09  
 Voscia NawasesSwakopmund""Namibia2025-10-09  
 Simson Shihepo""""Namibia2025-10-09  
 Julia HamadilaWindhoek""Namibia2025-10-09  
 Charlene Olynn""""Namibia2025-10-09  
 Kendra Olynn""""Namibia2025-10-09  
 Jacobus Farmer""""Namibia2025-10-09  
 Peter Michael Domingos""""Namibia2025-10-09  
 Salome Hanse""""Namibia2025-10-09  
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 Halliè-Jane Fredericks""""Namibia2025-10-09  
 Gizela Kaingo""""Namibia2025-10-09  
 Michael ShimbuluWindhoek""Namibia2025-10-09  
 Warren Jason Iyambo""""Namibia2025-10-09  
 Onesmus Kondo""""Namibia2025-10-09  
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 Kristofina S.""Namibia2025-10-09  
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## **Forensis and Forensic Architecture Report**

# Shark Island

## An Architectural Reconstruction of a Death Camp



A report by Forensis and Forensic Architecture, 12. April 2024

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## 1. Introduction

*This introductory text is a lightly edited version of remarks made by Gaob Johannes Isaack, chairperson of the Nama Traditional Leaders Association (NTLA), on the occasion of the event "Inherited Testimonies — German Colonial Genocide in Namibia,"<sup>1</sup> held at Haus der Kulturen der Welt in Berlin on the 3rd of December 2023.*

The Nama Traditional Leaders Association is a body corporate comprising all recognized traditional Nama Chiefs [...]. Its objectives are to promote traditional practices, customs, history and cultural heritage of the Nama people in the Republic of Namibia and those in the diaspora.

In light of its objectives, the NTLA and the Ovaherero Traditional Authority has for a long time discussed how best the sanctity of Shark Island, which will form the greater body of what will be presented today, must be protected. Unfortunately, with the dawn of independence, the story of Shark Island disappeared from the official narrative. After 33 years of independence Shark Island continues to be a tourist destination where visitors may freely walk on sacred ground and wine and dine on the bones of the heroes and heroines who started the earliest resistance against colonial occupation in Namibia.

Shark Island is unique in the sense that it was not only a concentration camp. It was actually a Death Camp. It is also unique because it bears testimony to an unprecedented event [in Namibia], namely the large-scale murder and cruel death of a human group of people. Memorializing Shark Island will go a long way in satisfying the desire to honour those who died and as a means to examine the past and address contemporary issues. It can promote social recovery and healing. It must be a place of contemplation, a place of remembrance and a place which warns that such acts of genocide should never happen again.

The NTLA and OTA consider this a long-term project and therefore foresees that its implementation will be incremental. I want to repeat myself and emphasise the deep painful experiences of so many unsung heroes and heroines' whose blood waters this island, my message goes out to the young ones of the day, you are the leaders of tomorrow and we want to do the best we can to carry over the history which will start at Shark Island and we want to make sure that it is not contaminated by systems of knowledge embedded in the conventional sociology about the writings on slavery and colonialism.

One of the most profound consequences of the colonial experience has been how the socio-political, cultural and economic assault of the colonies, has led to what sometimes seems to be an unbridgeable cultural gap between the nationals that were beneficiaries of colonisation, and those that were the victims of colonial assault. The era of colonial pillage and plunder led to the relative stagnation and quick decline of traditional cultural pursuits in the colonies. Shark Island and many similar places in the rest of the country where German imperialists had their concentration camps, are places of extreme tragedies and unparalleled human suffering at the time, yet little is known of this history.

<sup>1</sup> Isaack, Gaob Johannes. Speech held at 'Inherited Testimonies', Haus der Kulturen der Welt, 3.12.2023. See: <https://www.hkw.de/programme/events/inherited-testimonies>

The efforts which will be reflected here, epitomises the inflection point from which revealing messages, regarding the experiences of those harsh conditions of my people, and that of the Ovaherero folk, will emerge. It is my hope that the research process upon which we embarked, will lead to a new historiography and decolonized knowledge production. It is also my hope that the latter should be less tainted by the post-colonial biases of the current scholarship on people of colour. I think this should also give due consideration to the socio-psychological factors derived from lived experiences and effects of colonialism on the social agency of my people. Such knowledge, in my view, is required to help address the present conditions of my people, which to a great extent are a product of colonial history. By “addressing”, I mean healing the wounds and stigmas, and improving my people’s conditions in every respect — including their psychological well-being, education, political voice and power, economic ability to satisfy material needs, and rights such as access to natural resources. This is of course believing, in the long run, that knowledge derived from this exercise may add significant value to the process of decolonization of this knowledge.

I want to submit that we put effort behind overcoming the epistemological biases of scientific disciplines dominated by universities, scholars, and bodies of knowledge anchored in the Global North. By this I mean, our heritage is supposed to provide clues to our past and how we have evolved. Such information should help us examine our history and traditions, and enable us to develop an awareness about ourselves and why we are the way we are. Knowing well that western civilization and culture has precariously contaminated the traditional values of our people, I want to maintain that our predecessors had established, well before the advent of colonialism, a pattern of home-grown political systems, governance processes and generally acceptable institutional rule-making arrangements, such that there was progression in the pace of civilization of our country and self-styled tempo of technological development. The 1858 Hoachanas Treaty for the different Nama groupings signifies one such convention.

It delights me to know that new networks are doing rounds in the community of social movement literature, working on ontological pluralism and post-colonial thought, highlighting the costly psychological impact of colonialism upon both the colonised and coloniser. These critiques clearly illuminate how colonial exploitation facilitated the wealth of European societies. They envision a future of global racial equality and redistributive socioeconomic systems; projecting a world beyond empire episteme – Du Bois, Fanon, and Cabral are among those thinkers, who believed in new postimperial forms and modes of self-actualization, in which racial and cultural differences would flourish rather than be denigrated, erased, and replaced by Europe’s so-called civilization. It is common knowledge that postcolonial thought criticises the culture of empire, and we agree to the extent that it aims to introduce new orders to cultivate new knowledge and ways of representing the world and histories that circumvent or transcend, rather than authorise or sustain imperialistic ways of knowing. Production of new knowledge should take us beyond the current epistemic limits, and inculcate a sense of seeking transcendence, something beyond the colonial epistemes. It is only opportune that this event is hosted by the House of the Cultures of the World, which embodies critical thinking about how we create knowledge and narratives through different forms of expression.

## 2. Scope of Analysis

Forensis and Forensic Architecture (FA) have worked with the Nama Traditional Leaders Association (NTLA) and the Ovaherero Traditional Authority (OTA) and the Centre of Archaeology at Staffordshire University (CoA) to study sites related to the 1893 genocide of the Witbooi Nama, and different stages of the 1904-1908 genocide perpetrated against the Ovaherero and Nama by the German Colonial Army.

The NTLA and the OTA are traditional representative bodies of the Nama and Ovaherero people respectively, advocating for the preservation and celebration of the traditional customs, practices, history, and cultural legacy of their people both within Namibia and among the diaspora. The CoA is a renowned research facility specialised in novel techniques to the investigation of the recent and ancient past, in particular of the Holocaust and other genocides, and to missing persons investigations across the world.

As part of its overall research, FA and Forensis teams analysed available cartographic and photographic evidence, conducted fieldwork and solicited testimonies related to the concentration camp in Shark Island, Lüderitz, between 1905-1908 in order to:

- Locate and outline the extent of the concentration camp on Shark Island;
- Reconstruct the architecture of the concentration camp;
- Locate events or experiences recorded in the oral history transmitted by descendants of genocide victims;
- Determine whether extensions of existent port infrastructure in the bay<sup>2</sup> will infer on the former concentration camp area;
- Identify evidence of burial places in Lüderitz related to the genocide period, and assess the likelihood of those graves being those of the camp's inmates;
- Survey these burial places with a team of archaeologists using ground penetrating radar (GPR), to identify the potential presence of graves.

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<sup>2</sup> See chapter 4.1. for a more comprehensive description of planned changes to the port adjacent to Shark Island.

### 3. Summary

This investigation is the first to employ a precise digital reconstruction of the Shark Island concentration camp. Using advanced spatial analysis we were able to trace relations between sources unconnected until now and meld oral histories with archival footage, allowing for the most accurate model of the death camp to date. In a second step, we traced the burial sites of camp inmates in different locations around Lüderitz.

The spatial model of the island revealed the function of several structures visible in archival photographs, including the execution chamber, a field hospital and guard posts. Additionally, the model visualises how the natural architecture of the rocks – shaped by wind and waves – determined the camp's modes of use and inhabitation.

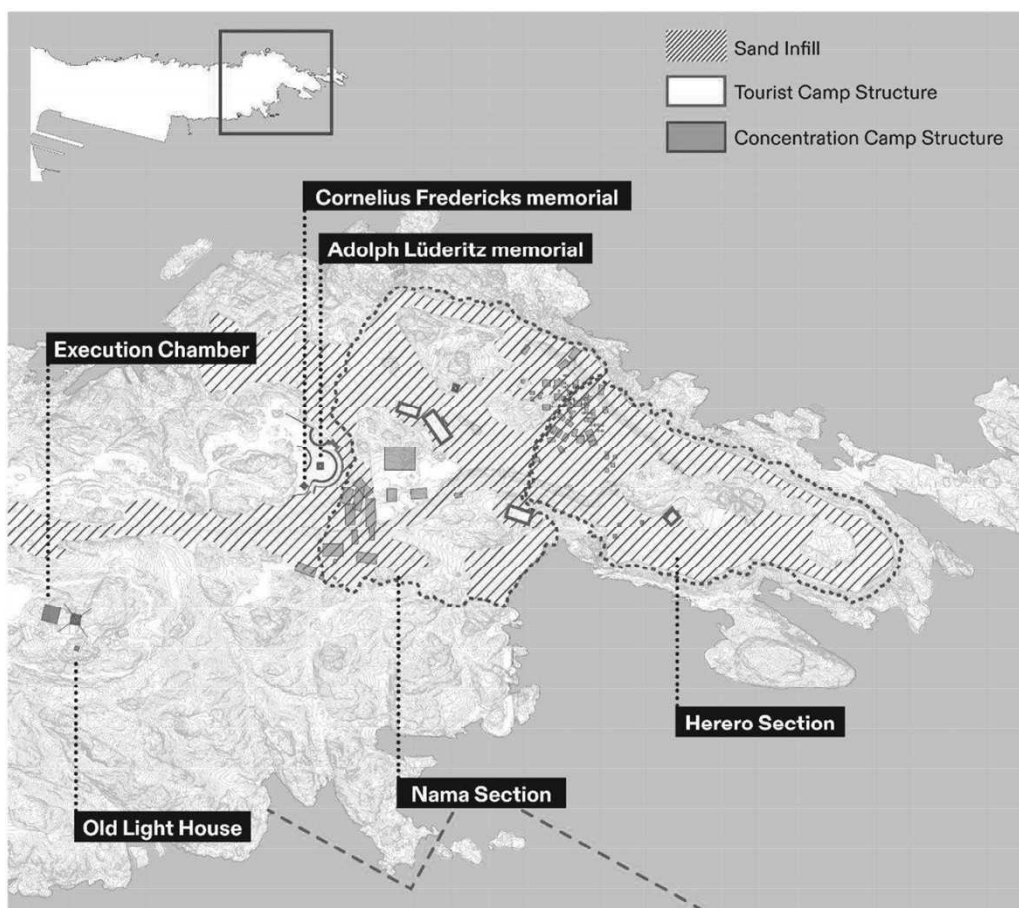


Figure 1. Map with structures and sections of the concentration camp on Shark Island as well as an overview of terraformation such as sand infill. FA/Forensis, 2024.

Our research allowed us to locate images of the concentration camp and thereby identify buildings marked on archival maps and mentioned in oral histories.



Figure 2. A photomatch of an archival image from Shark Island with our 3D reconstruction of the island, allowing us to place the execution chamber (here seen behind the red lighthouse) within the model and thus to determine its precise location. FA/Forensis, 2024.

The techniques employed were even able to identify markings in rocks stemming from forced labour that are depicted in archival photos and still traceable in the contemporary geography of Shark Island.



Figure 3. An inmate holding an axe in the archival photograph (Left). A human-made incision is visible today on the same rock the person with the axe was standing on (Right). FA/Forensis, 2024.

As a result of this research, our investigation arrived at the following findings:

- I. Present-day infrastructure, including tourist facilities, monuments of German perpetrators, roads, residential development and port infrastructure have been built over the former concentration camp, compromising it as a place of historical significance.
- II. The proposed extension of Lüderitz port in Robert Harbour poses further imminent risk to the site. Not only will the development affect Shark Island, but the dredging of nearby waters for the proposed port expansion will very likely disturb the remains of many who died on Shark Island, and whose bodies were thrown into the water.
- III. Around Lüderitz, unmarked graves exist that are very likely the interments of deceased inmates of Shark Island. Within at least one of these burial locations, several internments are likely to be mass graves. Infrastructure designed to connect the port to the surrounding desert runs the risk of destroying these unmarked burial sites.

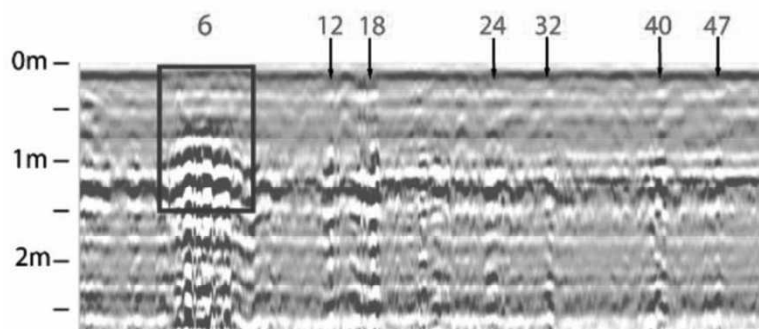


Figure 4. Data from the ground penetrating radar collected in Radford Bay outside Lüderitz. Feature 6 indicates a mass grave; the other features indicate individual graves. Centre of Archaeology at Staffordshire University and FA/Forensis, 2024.

## 4. Background

### 4.1. Historical and political context

Shark Island – today a peninsula – is located in the harbour of the Namibian town Lüderitz in the Karas region of Southern Namibia. The Shark Island concentration camp existed between March 1905 and April 1907 on the northern tip of the island. Set up by the German Schutztruppe, it served as a labour and extermination camp for Herero and Nama inmates captured during the German genocide of these communities.

Formerly known as Angra Pequena, Lüderitz was named so after the German merchant Adolf Lüderitz, who bought land from Nama Captain Joseph Frederiks II in 1883. This was the first land sale in what would later become Lüderitzland. !Nami#Nûs is the name of this ancestral Nama land in Khoekhoe Nama language.

After the 1904 and 1905 extermination orders, issued by the German imperial army against Ovaherero and Nama, concentration camps were established across German South West

Africa. Shark Island was initially opened as a camp primarily for the Ovaherero inmates whose forced labour was exploited to build critical infrastructure for the colony, including the Lüderitz-Aus railway. The Nama inmates arrived later in 1906.

Shark Island became the most notorious concentration camp in the colony due to its extremely harsh environment weaponized against its inmates. Freezing temperatures and a lack of shelter from tough winds and fog exacerbated the already dire and unsanitary living conditions and scarce food rations leading to outbreaks of typhoid and scurvy.

It is estimated that between 1,000-3,000 people perished in the Shark Island concentration camp,<sup>3</sup> most of them through hyperthermia and diseases as well as exhaustion due to excruciating physical labour building railroad tracks and the harbour, or as servants for White settlers. Uniquely brutal intimidation strategies in the camp included rape and various forms of torture, poisoning, medical experiments, and public executions. Captive women were forced to boil and scrape the heads of dead inmates which were then shipped off to Germany for pseudo-scientific research purposes.

Among the inmates that perished on Shark Island was resistance fighter and leader of the Nama !Aman people Cornelius Fredericks, who was decapitated on the island on 16 February 1907 and his skull sent to Germany.

When the camp was closed in April 1907, inmates were transferred to a so-called 'Burenkamp' in Radford Bay.

Even today, not all of the burial sites of the victims are known. According to oral history, the inmates who died on the island were thrown into the sea to be eaten by sharks or buried in shallow graves along the beach becoming food for hyenas. However, inmates who were executed with poison were buried in unknown locations off the island. Historical accounts refer to several locations of mass graves around the town.

During the concentration camp's operation and after its closure, Shark Island was terraformed, thus, the rock structure reshaped. At a later stage, the island was connected with the mainland to become a peninsula. Buildings, including luxury residences, were built on its south western side. Today, the north part of the peninsula where the camp was located serves as a tourist campsite. Sand has been filled into the gaps between the rocks to level the surface for tents and vans. Sanitary facilities were added. Almost no traces of the concentration camp structures are left today.

Soon, a foreseen extension of the port in Lüderitz will further impose changes upon the site. A large-scale hydrogen production project with related desalination and ammonia plants are planned around Lüderitz harbour. The small existing port operated by the state-owned enterprise Namport is planned to be expanded along the eastern side of Shark Island, invading the area of the former concentration camp. This development will also block the

<sup>3</sup> Erichsen, Casper and Olusoga, David (2010). *The Kaiser's Holocaust: Germany's Forgotten Genocide and the Colonial Roots of Nazism*. Faber & Faber; Zimmerer, Jürgen; Zeller, Joachim (2003). *Völkermord in Deutsch-Südwestafrika: Der Kolonialkrieg 1904–1908*. Berlin: Links.

view of the island from the city, robbing the city of the historical visual link to the island and robbing visitors of an understanding of how such atrocities were committed in full view of the town's citizenry. Roads and infrastructure will traverse the plain around Radford Bay, one of the areas we have investigated for likely mass and individual graves of Shark Island inmates, leading to a large zone with solar panels and wind turbines in the desert of the Sperrgebiet National Park. The project is supposed to be realised through investments amounting to 10 billion US dollars, the equivalent of the Namibian GDP, and is carried out by the Hyphen joint venture, under the responsibility of the German Enertrag company.<sup>4</sup>

#### 4.2. The site

The site has a complex rock morphology shaped by water and strong wind. The western side of the island – the one facing the open Atlantic ocean – bears the brunt of the waves, and is typified with steep and bare rock faces. The centre part of the island is typified by distinct, protruding rock formations with smooth faces sculpted by the westerly wind which blows strong mainly in the afternoons and evenings. The relation between the rock, the water and the wind defines the 'architecture of the island.' Areas closer to the eastern edge of the island are relatively protected, the water calmer, and the coast line even has a number of bays and small beaches. This structure of the rock defines the modes of the site's use and inhabitation. The built structures made to accommodate the inmates were largely flimsy tent structures and huts that offered little privacy and protection against the harsh environmental conditions of the island. Individual rocks divided the island into zones – separate Nama and Herero zones as well as zones where inmates were forced to work, as well as an administration and command and control zone where the guards were located. The rock formation also offered a natural stage set to those looking at the ocean from Lüderitz. This is why public executions were undertaken on the eastern side of the island facing the city.



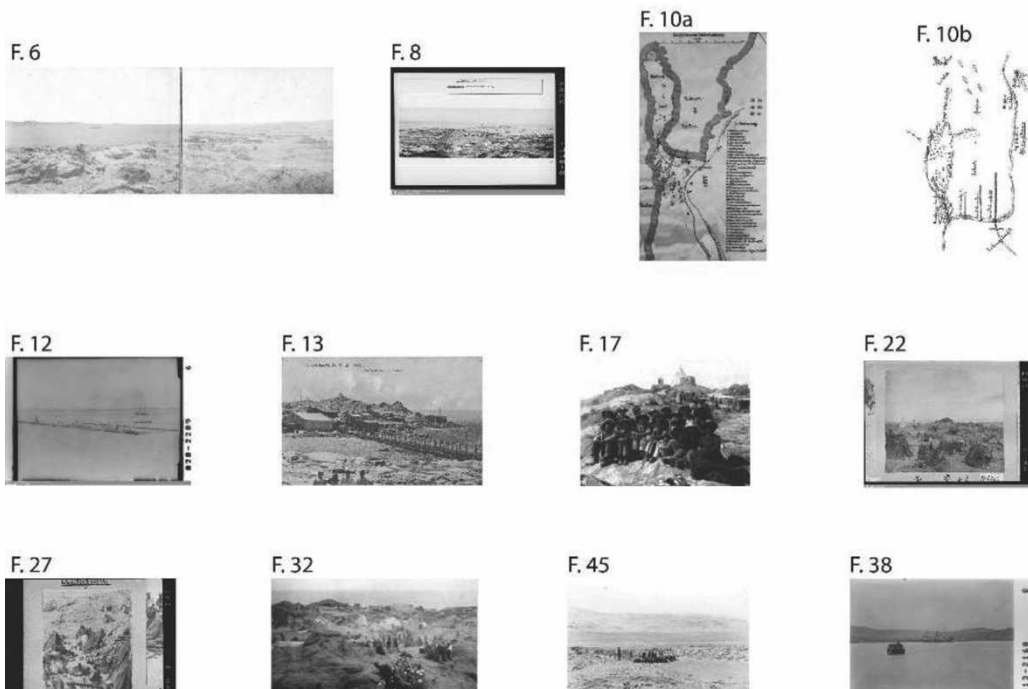
Figure 5. Drone photograph of Shark Island seen from North-East. FA/Forensis 2024.

<sup>4</sup> Enertrag SE is a Germany-based renewable energy company specialising in solar and wind power as well as gas. They operate plants globally, from Uruguay to Ghana. Some of their projects have been critiqued for a lack of transparency and public participation processes.

## 5. Materials Used in Analysis

### 5.1. List of archival photographs and maps

- Figure 6, 7. Namibia Scientific Society, 1904.  
 Figure 8. Koloniales Bildarchiv Universität Frankfurt, n.d.  
 Figure 10a. National Archive Namibia, 1905.  
 Figure 10b. Archive of the Rhenish Mission Society, 1910.  
 Figure 12. Koloniales Bildarchiv Universität Frankfurt, 1907.  
 Figure 13. Verlag Swakopmunder Buchhandlung, 1905.  
 Figure 17. Erichsen, Angel of Death, 2005, p.124  
 Figure 22. Koloniales Bildarchiv Universität Frankfurt, n.d.  
 Figure 27. Koloniales Bildarchiv Universität Frankfurt, 1905.  
 Figure 32. National Archive Namibia, 1906.  
 Figure 45. National Archive Namibia, 1906.  
 Figure 38. Koloniales Bildarchiv Universität Frankfurt, 1907.



### 4.2. List of aerial and satellite imagery

- Figure 11a. Surveyor General Office Namibia, 1965  
 Figure 11b. Surveyor General Office Namibia, 1984.  
 Figure 11c. Google Satellite, 2023.

## 5.2. Contextualisation of material

The analysis was based upon a variety of material types gathered from public and private sources in Namibia and Germany. Among these are archival photographs, maps and documents covering the period from the 1850s to the present. These are derived from a number of archives, including: the Namibian National Archives, the Colonial Image Archive of Frankfurt University, the Rhenish Mission Archive Wuppertal, Deutsche Kolonialschule Archive Kassel, the Übersee-Museum Bremerhaven and the German Federal Archive.

There are few photos from Shark Island concentration camp itself since the Schutztruppe was closely guarding the premises and did not allow for extensive documentation. While the camp was visible from the city, its rock topography shielded some parts of the camp hidden from view. There was very restricted access for guests from the outside. Some of the photos were taken by a German officer, Lieutenant von Düring, likely dating to the fall of 1905. We established this date since the camp, which opened in 1905, was seen to be in operation and General Lothar von Trotha, who left German South-West Africa in early November that year, is visible in some of the photos from the series — possibly just before his departure from the colony. While Düring was a member of the military, these photos seem to have been meant for private use. Yet they enforce the same dehumanising gaze that permeates the military occupation overall. In addition to photos of mainly women and children dying in the camp, Düring also took a pornographic image of a young naked Herero woman on Shark Island.<sup>5</sup> Like the other photos, it is a testament to the horrors, humiliation and total control faced by the inmates. Other photos of the island come from private collections or from commercial publishers that disseminated them as postcards.

Current and historic maps, satellite and aerial images were sourced from Google Earth, Google Maps and the Namibian Surveyor General. Ground-level photographs and drone shots were taken by the researchers during their site visit in Namibia.

## 6. Methodology

Forensic Architecture and Forensis employed the following methodologies to establish the exact locations of these photos and create a granular cartography of the Shark Island concentration camp.

### 6.1. Cartographic regression and aerial/satellite image analysis

Cartographic regression refers to the process of using historic surveys, maps and aerial photographs overlaid on contemporary imagery in order to track changes in the territory and landscape over time. Cartographic regression is increasingly being used in archaeological surveys as a means to evaluate the probable locations of cultural resources.

<sup>5</sup> Gewalt, J. B. (2003). The Herero genocide: German unity, settlers, soldiers, and ideas. In K. -A. R. Bechhaus-Gerst M. (Ed.), *Die (koloniale) Begegnung: AfrikanerInnen in Deutschland (1880-1945), Deutsche in Afrika (1880-1918)* (pp. 109-127). Frankfurt am Main: Peter Lang, p. 125.

We geo-referenced all aerial images and maps using a Geographic Information System (GIS) software. This allowed us to cross-reference satellite images with aerial photographs of Lüderitz over the years in order to ascertain information regarding changes to the terrain.

Since the events studied happened decades before the advent of aerial surveys, the investigation relies on archival cartographic material from the period. While those maps are often inaccurate according to modern standards, they contain valuable information of the extent of the mapped areas and landmarks of interest at the time.

#### 6.2. Fieldwork and site documentation

In September 2023, FA, Forensis and the CoA travelled to Namibia to undertake field research in Lüderitz. This was to inform our understanding of the contexts in which the investigation is carried out. To this end, we visited the known and suspected sites of several camps and graves, specifically Shark Island, Radford Bay and the former 'Burenkamp.'

#### 6.3. Situated testimony

Working with Nama and Ovaherero community members and oral historians, we employed a technique we refer to as 'situated testimony'. This involves testimony delivered while a witness experiences an immersive 3D model. The model can be built using CAD software or based on the re-configuration of a navigable game engine. The witness furnishes the bare model with elements such as structures or people as far as their memory allows them.

In relation to a genocide perpetrated almost 120 years ago, the testimonies are based on oral traditions, though also in this case witnesses were able to offer more precise descriptions of events when "located" within a 3D environment. During our field research in September 2023, we recorded testimonies from oral historians, descendants of genocide victims and leaders from traditional authorities. They spoke on the conditions in the camps, the architectural and natural constitutions of the camps and surrounding areas, as well as burial rites and the grave sites.

#### 6.4. Geolocation

Geolocation is the practice of establishing exactly where a photo was captured. An image can be geolocated by studying its content, by comparing it to others, or by looking at clues outside of the image, such as who shared it, or where it was found. We located the images we included in this research on multiple GIS platforms based on satellite images.

During our field research, we further employed ground truthing to connect the results from our technical analysis of the graves and concentration camps to the conditions on the ground.

#### 6.5. Photogrammetry

Photogrammetry is the art, science, and technology of obtaining reliable information about physical objects and the environment through processes of recording, measuring, and

interpreting photographic images and patterns. During our field research in Lüderitz, we conducted a drone survey of Shark Island forming the basis of the 3D model outlined below.

#### 6.6. Photomatching

Photomatching is the process of matching found still images or video to the corresponding 3D world, and thus measurement space. This step followed our photogrammetry process, as outlined above. We matched several archival photos to the current geology of the island.

#### 6.7. 3D reconstruction

In our analysis, digital models are more than mere 3D representations of real-world locations — we use 3D models as analytic or operative devices. Models help us to understand the location of images, camera positions or events in relation to one another. They also allow us to conduct new analyses based on spatial relations, including fields of vision, and the location and dimensions of structures. In doing so, models also allow us to conduct new analyses based on the spatial relations of structures to their surroundings. Our 3D reconstructions were built using the open-source 3D computer graphics and animation software Blender and the 3D computer graphics games engine Unreal Engine.

Using historical photographs, aerial images and photogrammetry we built accurate and geo-referenced 3D models of the topography of Shark Island. This model has been used to create for the first time a detailed topographic map of the island with a 25 cm resolution.

#### 6.8. Ground Penetrating Radar

Ground penetrating radar (GPR) is a technique for the identification and investigation of buried remains. GPR functions by recording reflections or attenuations of electromagnetic (radar) signals that are continuously emitted from a roving antenna. These reflections or attenuations are affected by the physical properties of the subsurface and any buried features within it. The reflections are then recorded and visualised in 2D profiles and 3D data plots called timeslices that can be analysed to determine the presence, size, and nature of buried remains.<sup>6</sup>

## 7. Reconstruction of Shark Island and the Concentration Camp

#### 7.1. Perimeters of the concentration camp

The image below is the oldest traceable archival photograph of Shark Island, here visible on the right side, dating back to the late 19th century. The only visible building on the island is the pyramid-shaped structure which can be seen clearer on later photographs (see Fig. 7).

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<sup>6</sup> See full report here: Colls, Kevin and Mitchell, William (2024). A non-invasive forensic investigation of the slave cemeteries sites in Lüderitz and Swakopmund, Namibia. Centre of Archaeology at Staffordshire University.

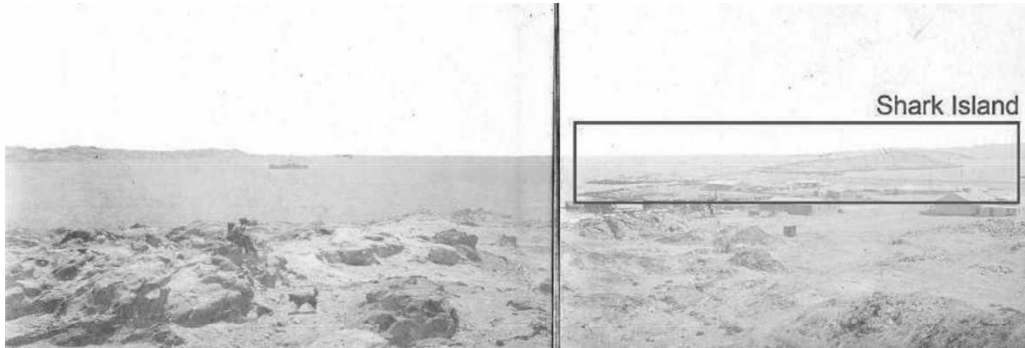


Figure 6. Photo likely dating to the late 19th century with Shark Island on the top right and buildings in the harbour of Lüderitz in the foreground. Namibia Scientific Society.

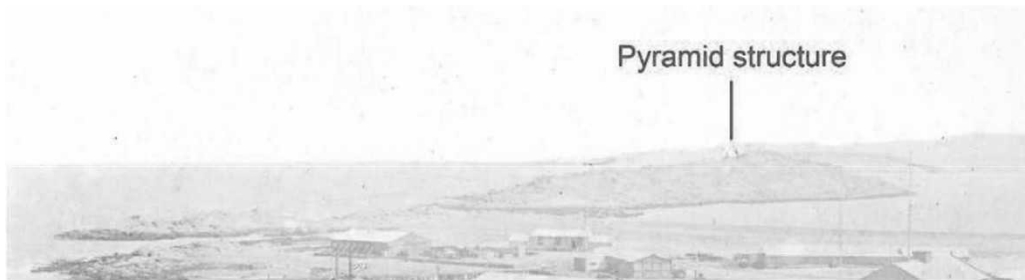


Figure 7. Close-ups depicting the increasing number of buildings on Shark Island and the bridge connecting the island to the mainland.

Later images dated to around 1904, show various buildings at the island's entrance and a bridge connecting it to the mainland.

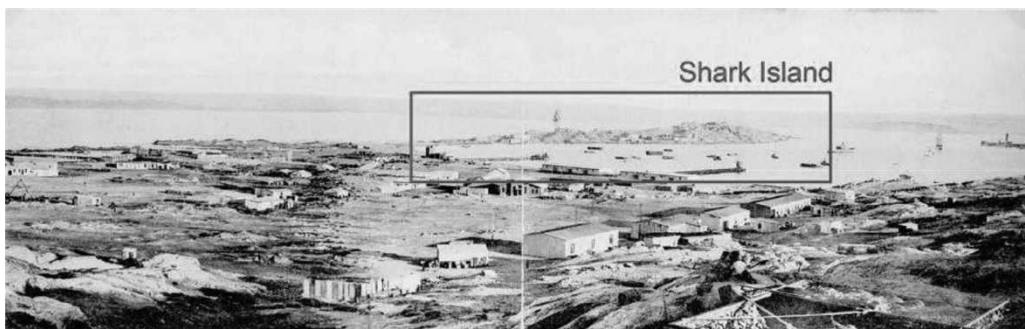


Figure 8. Photo likely dating to 1904 of 'Lüderitzbucht: Panorama der Stadt (DSWA)' ['Lüderitz Bay: panorama of the city (German South West Africa)'] with Shark Island visible in the centre. Koloniales Bildarchiv Universität Frankfurt.

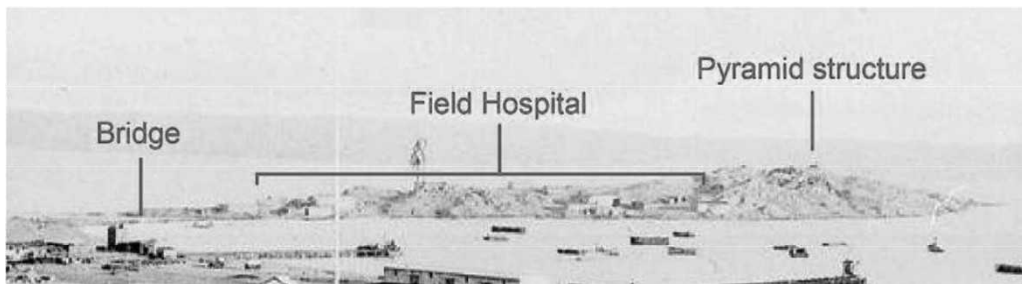
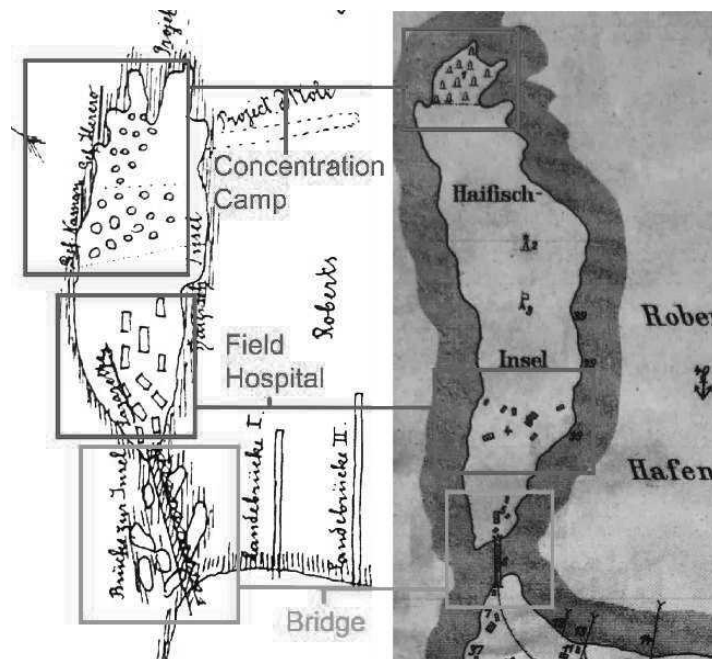


Figure 9. Close-up of Figure 8 depicting the increasing number of buildings on Shark Island and the bridge connecting the island to the mainland.

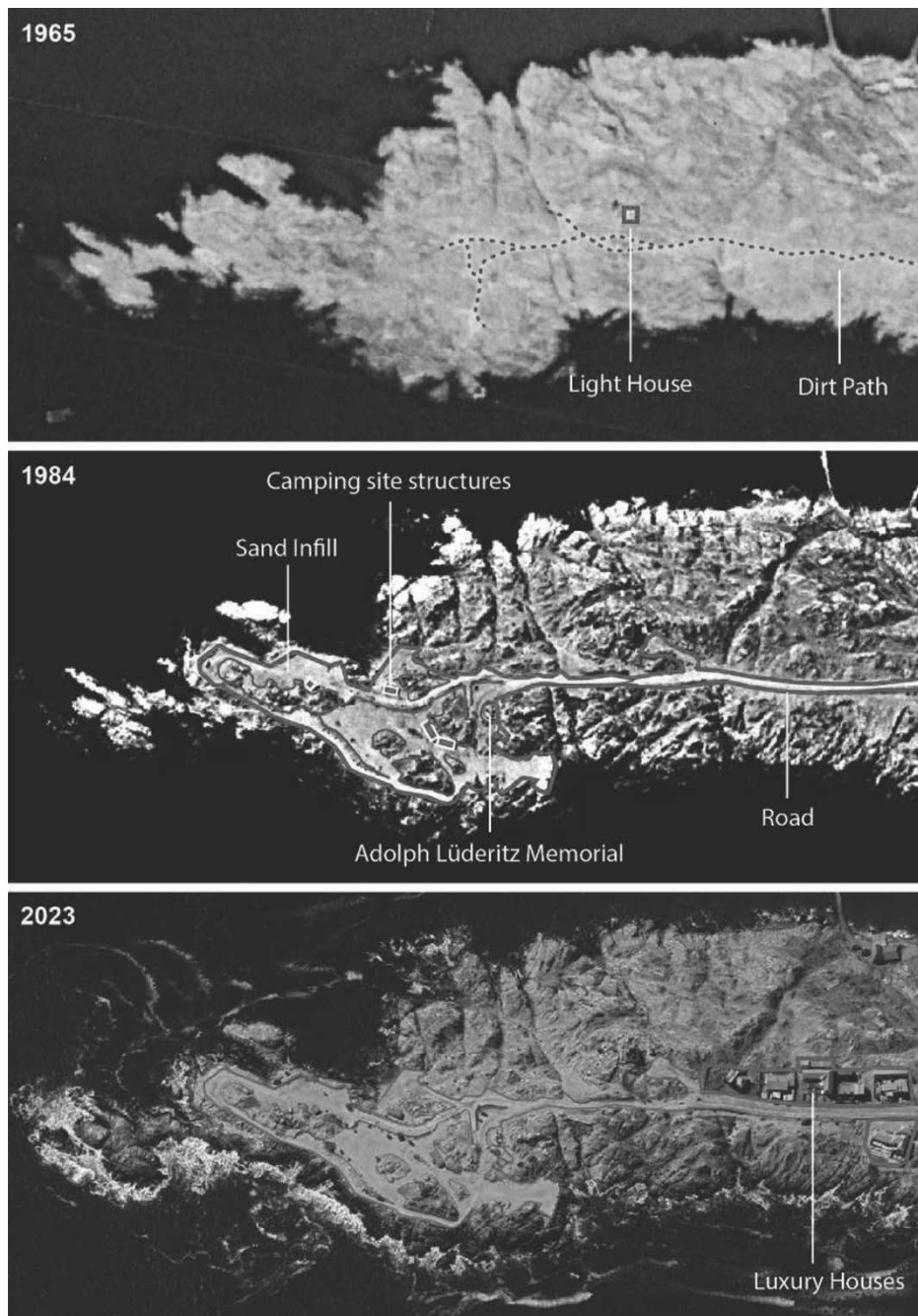
The point of departure for our reconstruction of Shark Island and its concentration camp during the period of the genocide were two historical maps depicting the peninsula during its operational period as a concentration camp. Figure 10a is a hand drawn map by a local missionary, Emil Laaf; the producer of Figure 10b is unknown. Both of these maps depict the island connected to the mainland via a bridge and both place the concentration camp at the tip of the island while the German field hospital is located at the entrance.

We were able to corroborate the location of areas marked in these maps by geolocating and analysing archival imagery from different sections of the camp.



Figures 10a, b. The map on the left, drawn by Missionary Emil Laaf in 1906 and cropped here for comparison, shows a rough sketch of the concentration camp. Archive of the Rhenish Mission Society. The right map, published in 1910, seems to be depicting Lüderitz when Shark Island concentration camp was operational, as indicated by the tent drawings at the tip of the island. National Archive Namibia.

## 7.2. Alterations to the island



Figures 11a-c. These aerial and satellite images of Shark Island show the concentration camp site's alterations between 1965 and 2023.

Today, the northern part of the island, where according to historical maps the concentration camp was located, is a tourist camping site (Fig. 11). All the buildings pertaining to the concentration camp have disappeared. The southern part of the island forms part of the port and residential buildings stretch along the street reaching over from the mainland.

By analysing aerial photographs and satellite imagery over time, it becomes apparent that drastic landscape alterations happened between 1965 and 1984, during the height of South Africa's colonisation of Namibia and the apartheid era, possibly in the mid-1970s.

In the aerial image from 1965, the rock formation on the northern part of the island seems fairly intact, with only a narrow dirt path leading to it. The Shark Island lighthouse is also visible in this image. In 1977, an old European cemetery was transferred from the northern part of Lüderitz to Shark Island and the human remains were placed alongside memorial plaques for the German 'pioneer' Heinrich Vogelsang and Adolf Lüderitz.<sup>7</sup>

In the aerial image from 1984, extensive landscaping changes are visible. The narrow path has turned into a road and large sections of the northern part of the island have been flattened by sand infills while various memorials commemorating the perpetrators of the genocide were erected. Sanitary facilities for the camping site that are still intact today become visible.

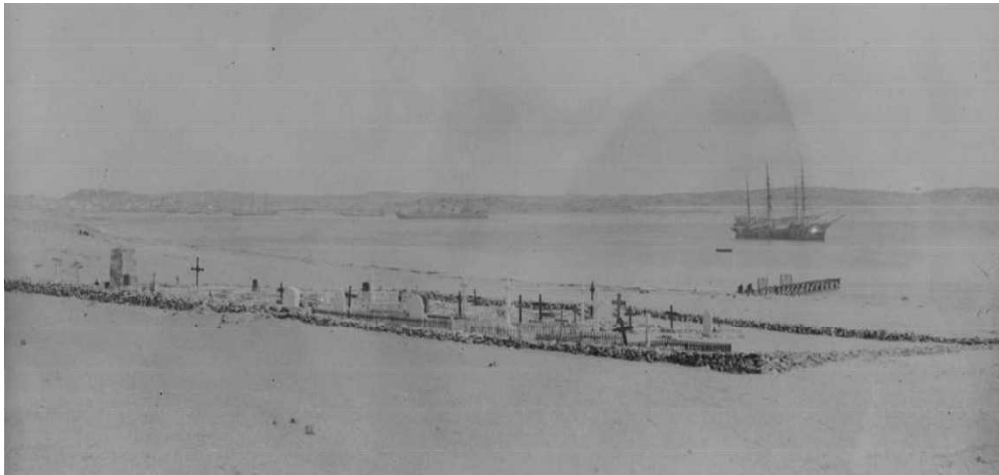


Figure 12. Photo captioned "Lüderitzbucht 1907 / Alter Friedhof am Roberthafen" [Lüderitz Bay 1907 / Old cemetery at Robert Harbour]. Koloniales Bildarchiv Universität Frankfurt.

From 1984 to the present day not much has been added to the northern part of the island except a small monument remembering Cornelius Fredericks, the Nama leader who was detained and decapitated on the island in February 1907. However, luxurious residential buildings have been erected in other parts of the island.

<sup>7</sup> In 1883, Heinrich Vogelsang led the first German expedition to Lüderitz, then called Angra Pequena. Adolf Lüderitz was a merchant from Bremen, Germany, who financed said mission and later bought a sizable amount of land in the area under dubious circumstances, defrauding Nama Captain Joseph Fredriks II about the size of the plot.

### 7.3. Position of field hospital

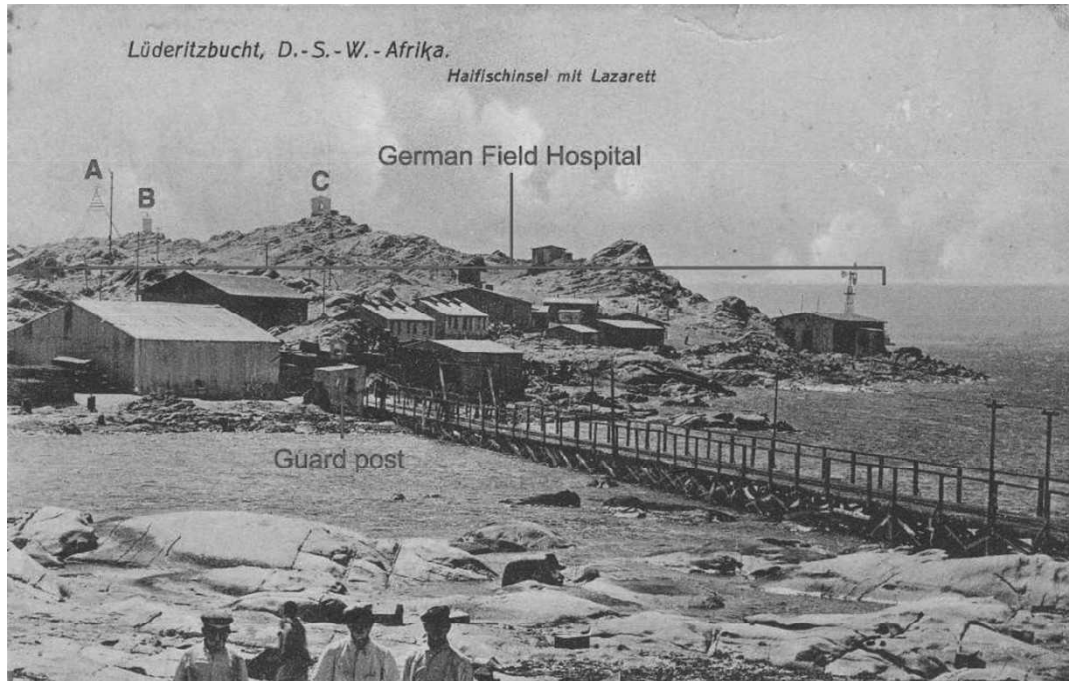


Figure 13. Postcard titled 'Lüderitzbucht, D.S.W. Afrika, Haifischinsel mit Lazarett' ('Lüderitz Bay, German-South-West Africa, Shark Island with hospital'). It was published in German South West Africa by a German bookstore in 1905. Verlag Swakopmunder Buchhandlung.

The image above depicts the entrance to the island which was then connected to the mainland only through a wooden bridge. Visible in the forefront of this image is 'Feld Lazarett XII,' the German field hospital. This photograph corroborates the location of the field hospital marked in the two hand draw maps (Fig. 10). By 3D-modelling and placing all the visible structures in this image within the Blender 3D software environment, we were then able to cross reference these structures and identify their functions according to the tags from the map below (Fig. 14).

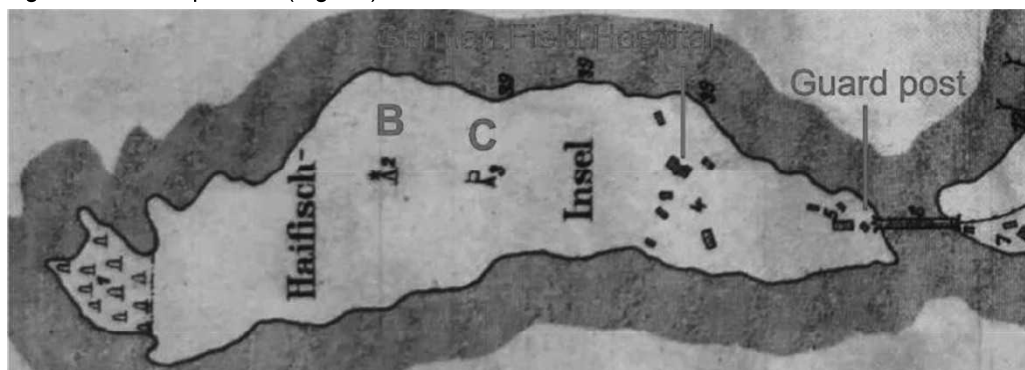


Figure 14. Rotated excerpt from the map in Figure 10 with building structures marked red. FA/Forensis, 2024.

In Figure 14, the original labelling of the map reveals buildings matching the locations of structures tagged B and C within our model and the photograph: a lighthouse and a signal station. While the structure tagged A, a pyramid-shaped steel beacon, is also visible in other archival photographs from the period, its function is not clear.

Through interviews with descendants of Shark Island victims, it was established that the structure tagged D, right at the entrance to the island and on the left side of the wooden bridge, is most likely the guards' post (Fig. 13).



Figure 15. A photomatch of the postcard in Figure 13 within our 3D reconstruction of the island, allowing us to place the buildings within the model. FA/Forensis, 2024.

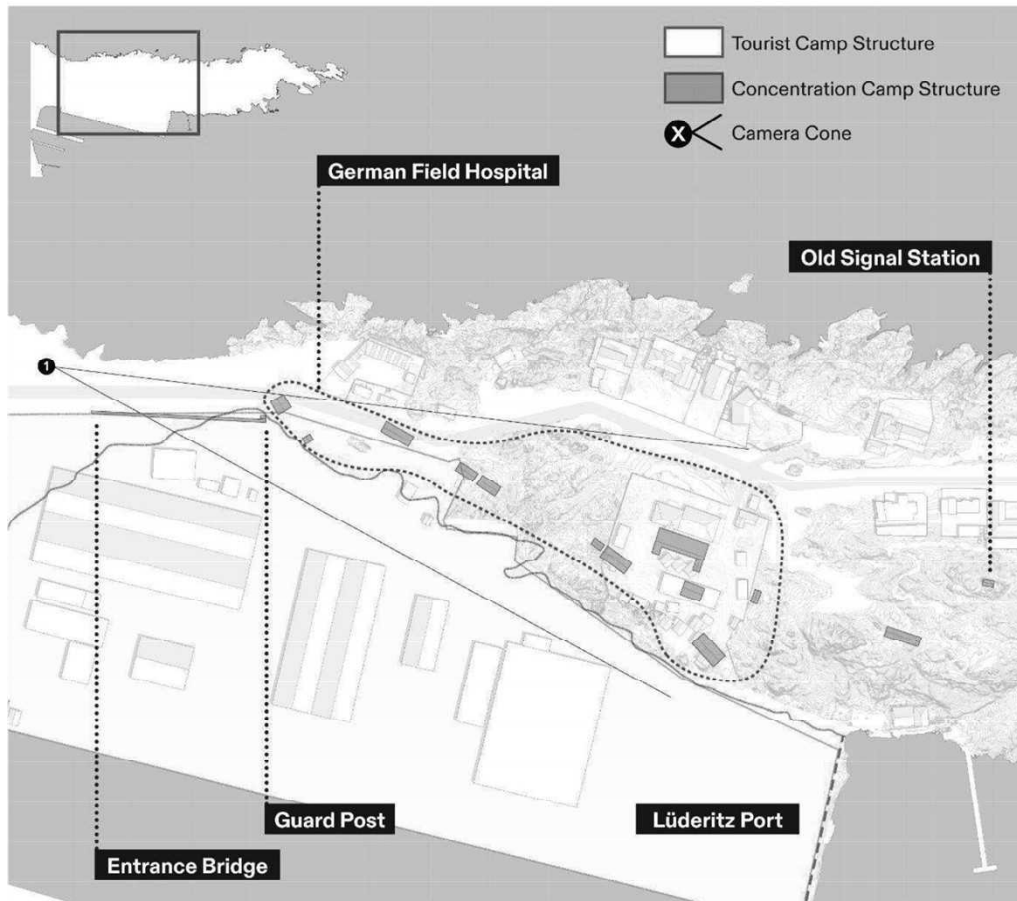


Figure 16. Map illustrating the structures on Shark Island seen in the archival photo Figure 13. FA/Forensis, 2024.

#### 7.4. Position of execution chamber

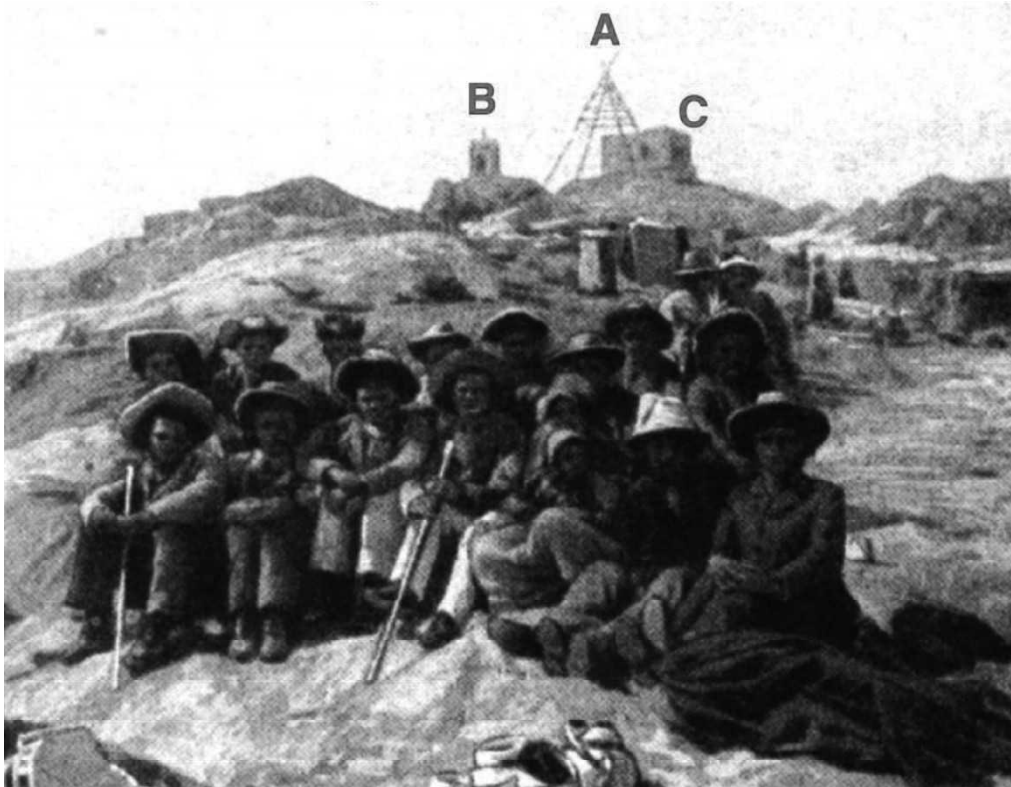


Figure 17. A retouched photo of Nama inmates in Shark Island, likely dating to late 1906. Distinct camp structures are visible in the background. Taken from: Erichsen, *Angel of Death*, 2005, p. 124.

This archival photograph depicts a group of about 20 Witbooi Nama inmates — recognizable by their clothing and hats — in the foreground and three distinct structures in the back, alongside two temporary tent-like structures most probably housing inmates interned on the island.

The Pyramid shape structure (tagged A) and the lighthouse (tagged B) on its left side were identifiable in Figure 13. An additional structure (tagged C) is visible in Figure 17 directly behind the pyramid.

Using our topographical 3D model, we established the exact location of the camera and placed it within the 3D environment of the software Blender using the method described above as photomatching (see page 14). During this process geological features were put in accordance with both the 3D model and the archival image.

According to testimonies of descendants, structure C was used as an execution room. The descendants believe that in this building the skulls of Herero and Nama were scraped by other inmates in order to be sent to Germany.

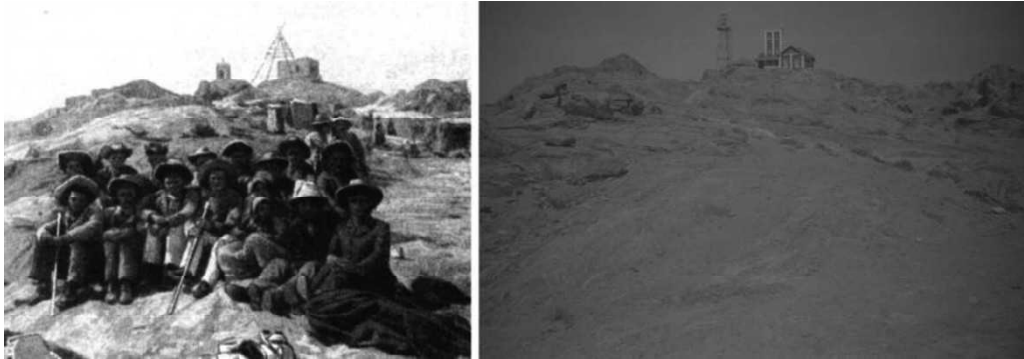


Figure 18. The same view is captured in the archival photograph (Left), and in the image taken by Forensic Architecture in September 2023 from the same area (Right).

As a next step, all the major structures visible in this photograph were modelled in detail and placed at their exact locations within the 3D model. As a result it became clear that the three structures visible on the top of this image used to stand very close to where the lighthouse is located now.

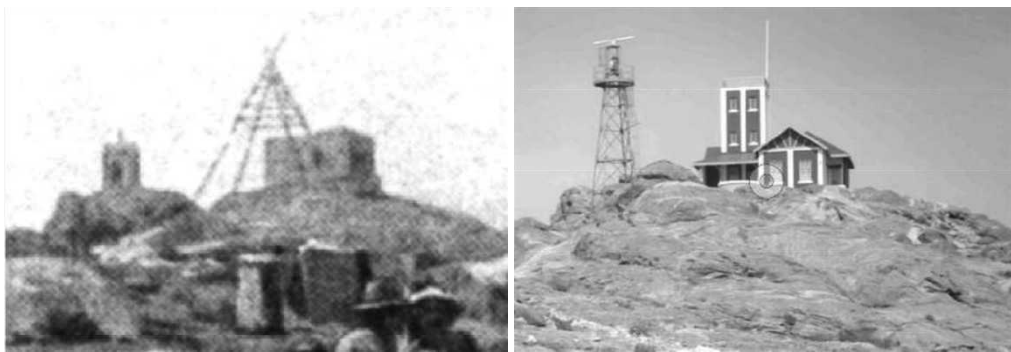


Figure 19. Zooming in on both photos shows that the execution chamber (Left) stood on the same rock as the red lighthouse does today (Right).

Similarly, in their testimonies, descendants of Shark Island victims stated that oral history professes that there had been a building used for executions and for scraping skulls “where the lighthouse stands today.” We identified this building as structure C.

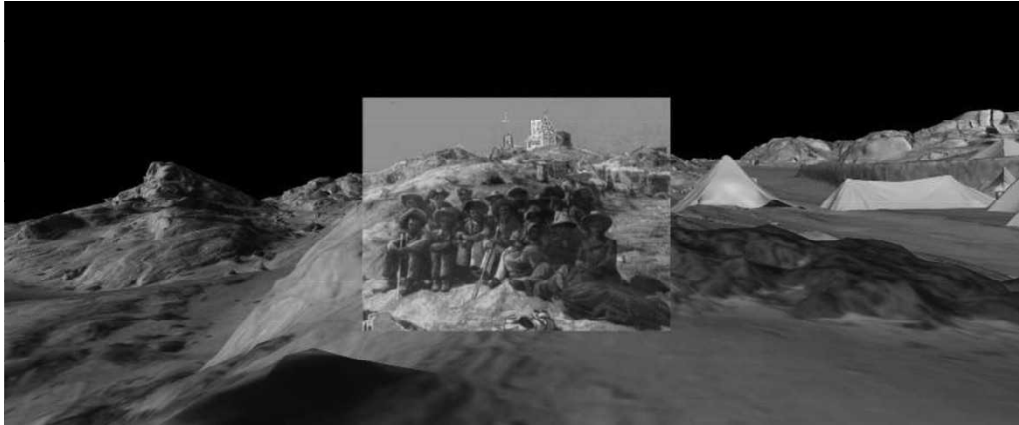


Figure 20. A photomatch of Figure 17 within our 3D reconstruction of the island, allowing us to place the execution chamber within the model and thus to determine its precise location. FA/Forensis, 2024.

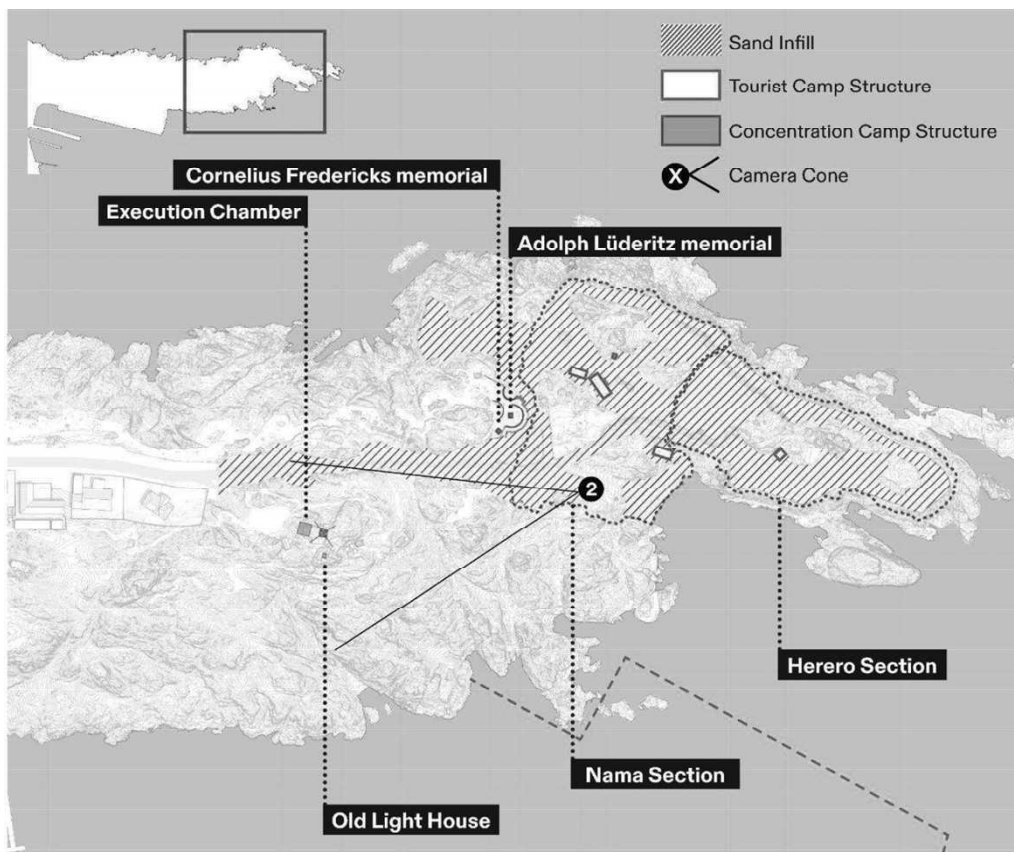


Figure 21. Map illustrating the structures on Shark Island seen in the archival photo Figure 17 in addition to the structures and terraformation realised for the tourist campsite. FA/Forensis, 2024.

### 7.5. Position of Herero camp structures



Figure 22. Photo of the Shark Island concentration camp titled 'Haifischinsel : Lager der gefangenen Herero und Hottentotten: Hereropontok' ('Shark island: Camp of the Herero and Nama - Herero Pontok'), n.d., Lt. v. Düring, Koloniales Bildarchiv Universität Frankfurt.

This archival photograph shows the Herero section of the camp. We identified at least 21 temporary structures in this image which are most probably self-made housing structures for the inmates. The absence of people in the image suggests that inmates were possibly outside of the camp performing forced labour.

We geo-located this image through the distinct rock formations visible in this section of the camp. The rock at the centre of the image is clearly identifiable on the island today as seen in Figure 23.



Figure 23. Image taken by Forensic Architecture in September 2023 capturing the same view as Figure 22.

What becomes immediately clear is that most of the area visible in the archival photograph has been terraformed and covered in sand, flattening the area for vehicles, tourist tents and amenities.

We used the aforementioned rock as an anchor point in order to precisely place the archival photo's camera angle within the 3D environment. The location of the camera is on the upper part of the island and close to the area marked by Map A as the Herero area.



Figure 24. Structures visible in the archival photograph are placed within the 3D model, thus showing the extent of the sand infill. The marking visualises the same rock standing out in both images.

We modelled the visible structures, placed them in our model and found that most of the concentration camp structures visible in the foreground of this image would be buried beneath at least 130 cm of sand infill. Archaeological excavation in this area could reveal crucial remnants related to the conditions of the camp and its operation.

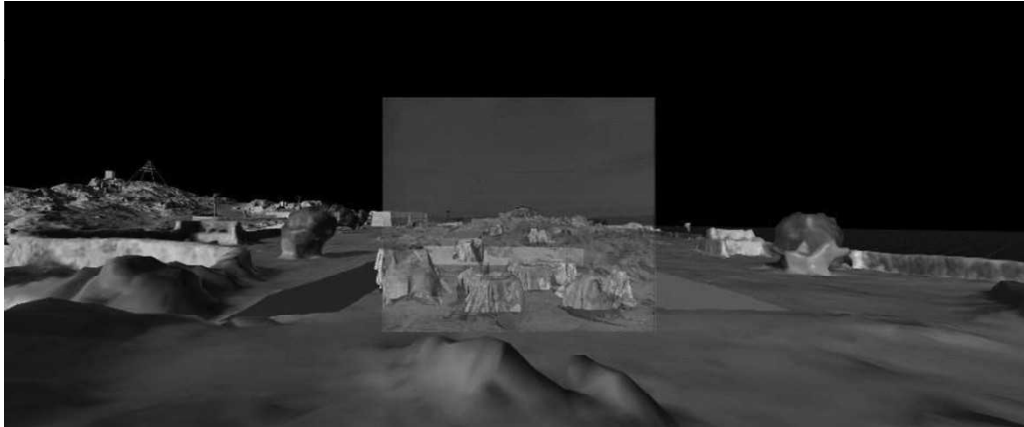


Figure 25. The view from Figure 22 is placed within our 3D reconstruction of the island allowing us to calculate the sand infill and locate the Herero section of the camp. FA/Forensis, 2024.

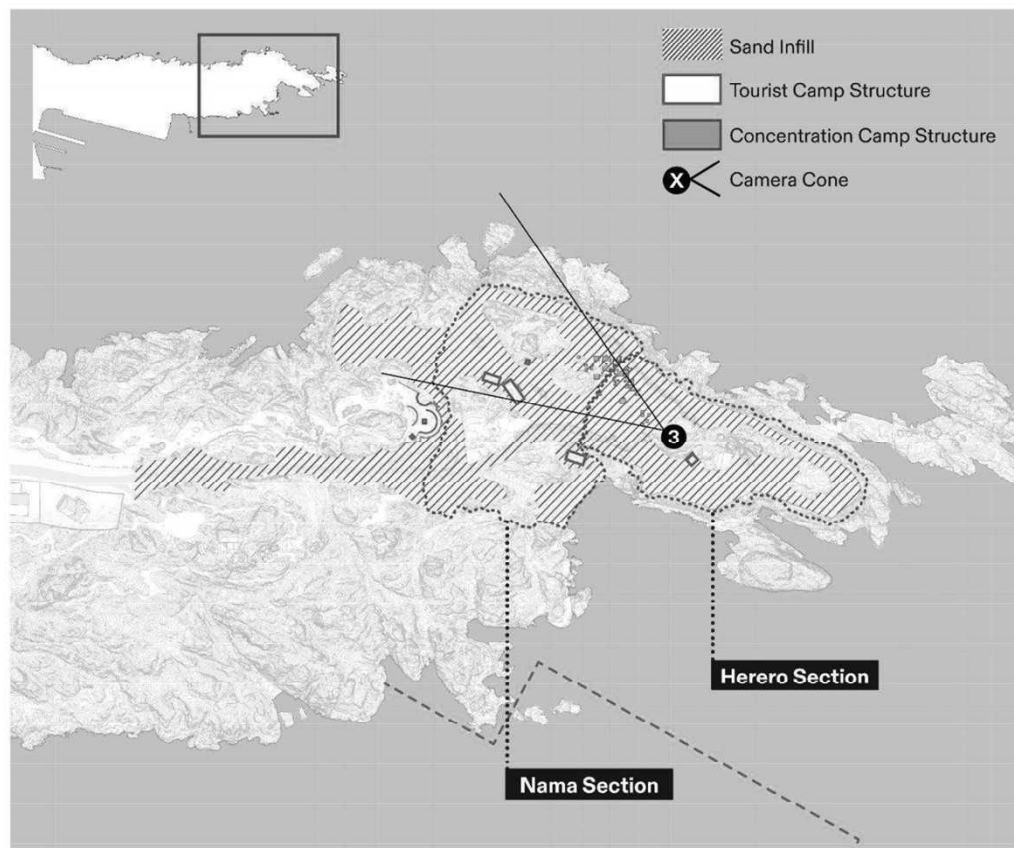


Figure 26. Map illustrating the structures on Shark Island seen in the archival photo Figure 22 and visualising the different sections of the concentration camp. FA/Forensis, 2024.



Figure 27. Photo, likely dating to 1905, of Herero inmates in the concentration camp surrounded by tent structures offering little protection. The red marking captures a distinct rock we used to locate the image. Koloniales Bildarchiv Universität Frankfurt.

This archival photograph comes from the album of Lieutenant von Düring and likely dates to October 1905. Düring captioned the image, 'Shark Island: Herero inmates,' and it depicts another side of the camp's Herero section.

We identified 9 temporary structures in this photograph. Further, we geolocated this image by referencing a distinct rock on the upper left side of this image, marked by a cross.

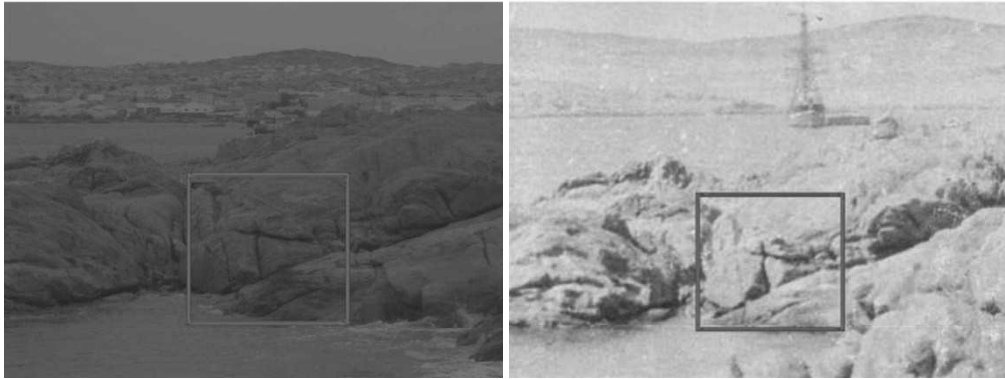


Figure 28. A rock with a distinct shape is marked both in the archival photograph and in an Image taken by Forensic Architecture in September 2023 from the same area.

Using this rock as an anchor point and placing the camera within our model, we realised the view captured in this image is blocked today. We found the location of this camera by digitally removing the structure and the sand infill.

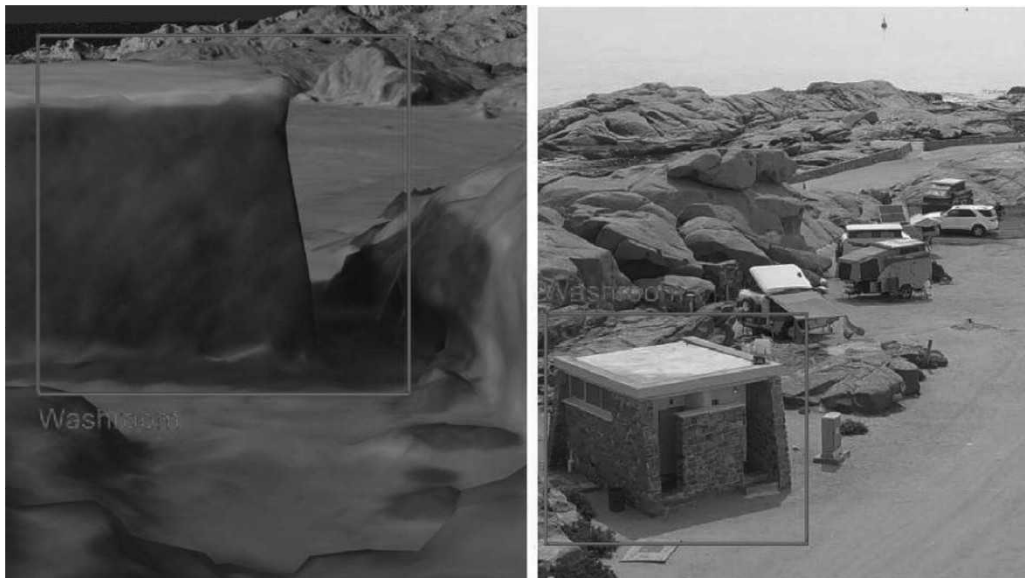


Figure 29. The image on the left captures the same camera angle as in the archival photograph within the 3D software environment. The structure blocking the view is the washroom visible on the image on the right.

The structure blocking this view is one of the contemporary camping site washrooms, positioned exactly where inmates stand in the archival image. This finding suggests another important location for further archeological investigations.

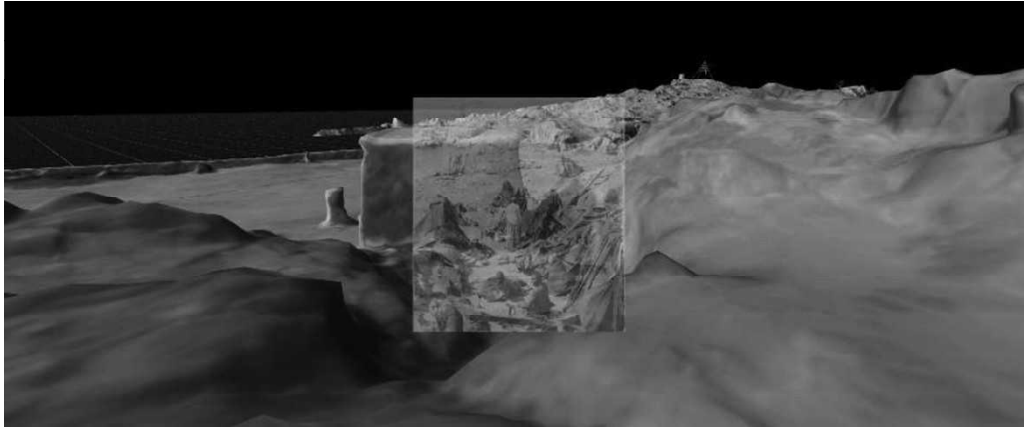


Figure 30. The archival photo Figure 27 is placed within our 3D reconstruction of the island allowing us to locate the Herero section of the camp. FA/Forensis, 2024.

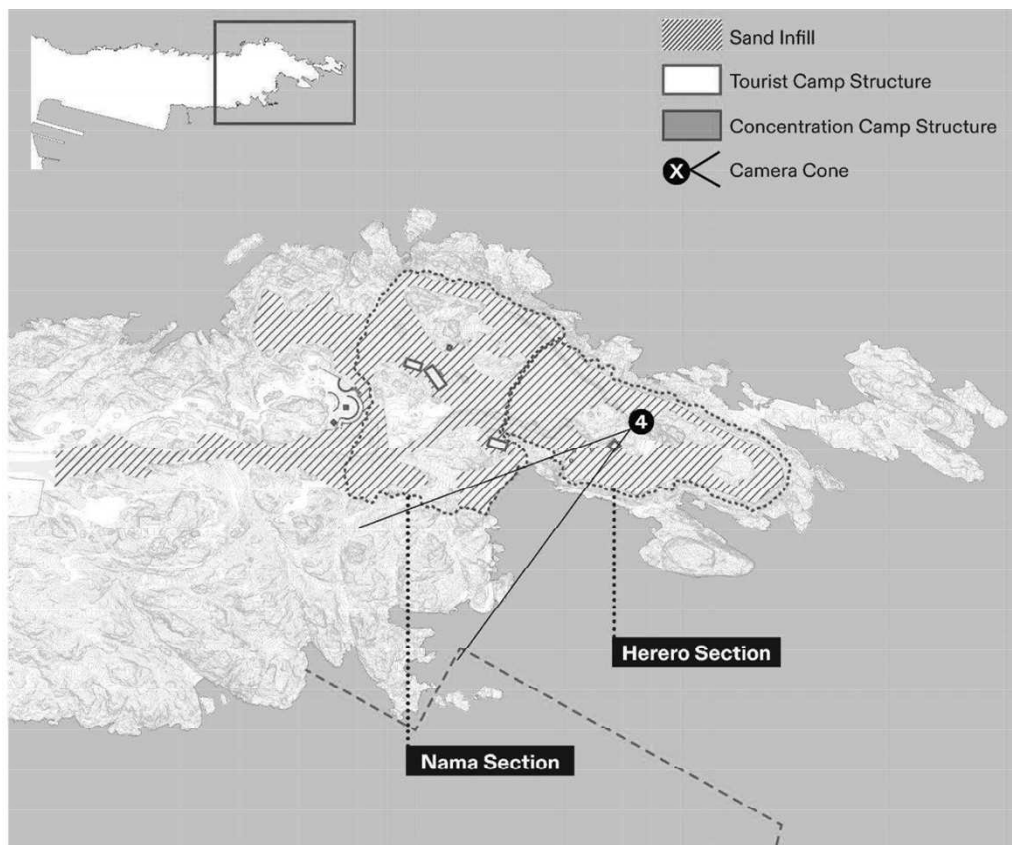


Figure 31. Map illustrating the structures on Shark Island seen in the archival photo Figure 27 and visualising the different sections of the concentration camp. FA/Forensis, 2024.

## 7.6. Position of Nama camp structures and evidence of forced labour



Figure 32. Photo of the Nama section of the concentration camp depicting inmates conducting physical labour. National Archives Namibia, 1906.

This image, likely dating to 1906, mainly shows the Nama area of the concentration camp. Parts of the Herero section are visible in the upper right corner. The temporary structures in the Nama area seem to be military tents and distinguish themselves from the structures in the Herero areas.

Similar to other photomatches, in order to locate the camera within our 3D model, we looked for recognizable rocks and used them as anchor points.

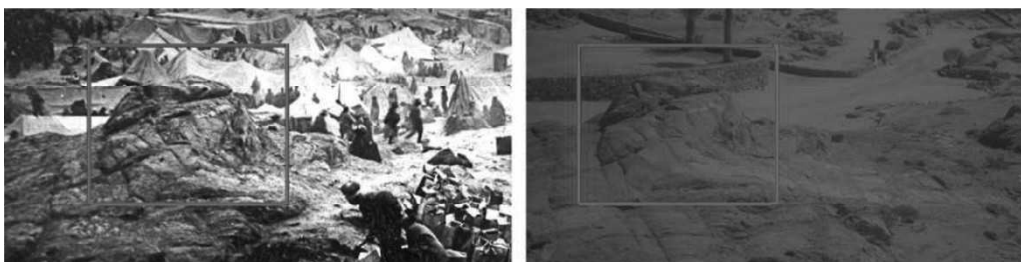


Figure 33. The same rock marked in the archival photograph and within the 3D model environment. FA/Forensis, 2024.

After modelling the visible structures in the archival photograph and placing them within our 3D model, it became evident that almost the entirety of this visible section of the camp falls within the heavily landscaped part of the island. Most of the structures of the Herero section

in this image on the upper right corner are completely buried beneath sand infills but also the geology on the Nama section has been gravely altered.



Figure 34. The same view captured in the archival photograph (Left), is visible within the 3D software environment (Center), and in the image taken by Forensic Architecture in September 2023 from the same area (Right).

The inmates of Shark Island were mostly forced to work outside of the camp, for instance building railroad tracks for the line from Lüderitz to Aus or in the construction of the harbour. However, inmates were also involved in egregious labour projects on the island itself, such as the erection of a pier in close proximity to the camp. According to the work diary of construction technician Richard Müller, this project failed due to the high casualty rates of inmates and consequently a lack of labour force.<sup>8</sup> To provide building material for this project inmates were forced to break rock with pickaxes and sometimes even explode stones with dynamite.

The woman in the foreground of the picture appears to be breaking rocks with an axe. Several buckets filled with stones are visible close to her. By geolocating the position of this woman on the island and identifying the rock she is standing on, we were able to find clear traces of human-made incisions on this rock. Likely these are traces of the movement she is seen undertaking in this image from 1906. The image below shows a 3D scanned image of this specific rock and traces of forced labour on it.

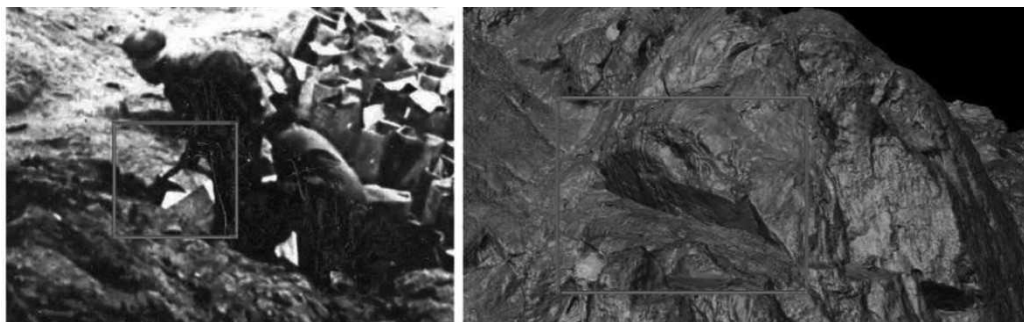


Figure 35. An inmate holding an axe in the archival photograph (Left). A human-made incision is visible on the same rock the woman with an axe is standing on (Right). FA/Forensis, 2024.

<sup>8</sup> Müller, Richard. Arbeitstagebuch, Dec. 24, 1906. Kaiserliches Hafenbauamt. National Archives Namibia.

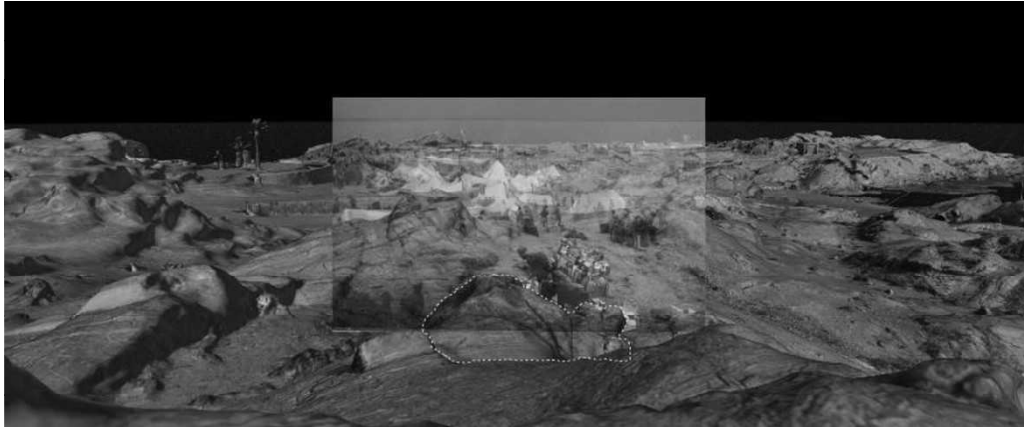


Figure 36. The archival photo Figure 32 is placed within our 3D reconstruction of the island allowing us to locate the Nama section of the camp. The distinctive rock from Figure X is outlined in white. FA/Forensis, 2024.

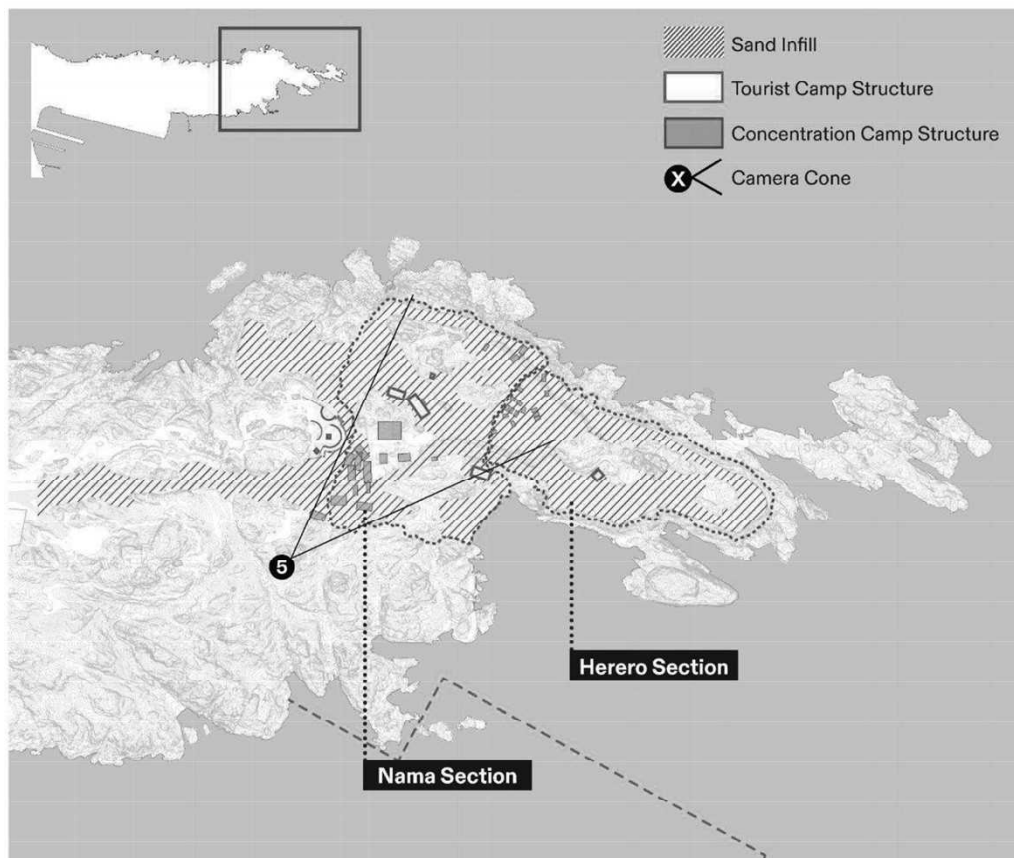


Figure 37. Map illustrating the structures on Shark Island seen in the archival photo Figure 32 and visualising the different sections of the concentration camp. FA/Forensis, 2024.

### 7.7. Position of the Lenz camp



Figure 38. Photo of Lüderitz harbour with the Lenz labour camp marked by the red frame. The Dunbeth wreck is at the centre of the image. Koloniales Bildarchiv Universität Frankfurt, 1907.

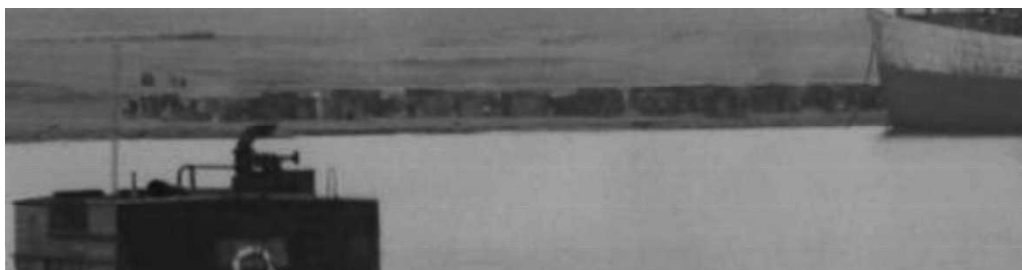


Figure 39. Close-up of the Lenz labour camp in the harbour of Lüderitz. FA/Forensis, 2024.

On the hand drawn Map by missionary Laaf at the beginning of this report (Fig. 10), another camp run by the railway company Lenz is labelled as 'Captured Hereros,' next to the stranded Dunbeth ship. The archival photograph above is taken from Shark Island on July 14, 1907 and appears to capture a rare image of the Lenz camp and the wreck alongside it.<sup>9</sup>

<sup>9</sup> The ship was stranded on June 6, 1906 and stayed in the harbour until 1910 adding another indication to the photo's date.

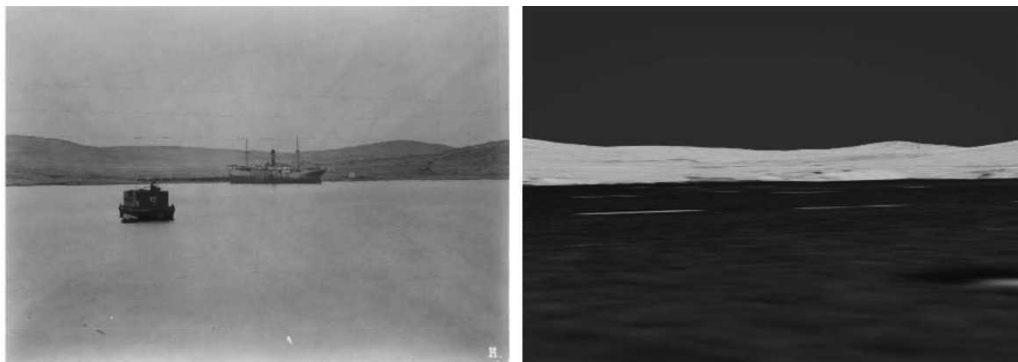


Figure 40. The same view, captured in the archival photograph (Left) and within the 3D model environment allowing us to place the camp on the map (Right).

By placing the camera cone of the photo (Fig. 38) within our 3D model we were able to establish the exact location of the Lenz Camp which corresponds roughly with what is visible on the hand drawn Map by missionary Laaf.



Figure 41. The camera angle of Figure 38 placed within our 3D model. The red box marks the position of the Lenz Camp. FA/Forensis, 2024.

## 7.8. Findings

Our analysis has revealed the following findings:

- I. The spatial model reveals the precise extent and spatial layout of the former concentration camp (Fig. 42);
- II. The testimonies and the matching of archival photos to the current island geography allowed the identification of the function of several structures visible in archival photographs, including the structure reportedly used for public executions, guard posts, the field hospital, the lighthouse, a signal station as well as the Nama and Ovaherero sections of the camp. Further, we identified Lenz Camp, another concentration camp, within Robert Bay.
- III. Extensive terraformation has taken place on the island, such as sand infill that raised the ground level for the benefit of roads, car parking and flat camping areas.
- IV. Present day infrastructure that we mapped on the island, such as a tourist campsite, monuments, residential buildings and port developments have been built on top of or very close to the former concentration camp.

Our findings demonstrate that the infrastructure for the tourist camp, such as roads or sanitary facilities, are situated directly on top of the former concentration camp, thus an area of archaeological, historical, religious and emotional significance.

The current usage of the site desecrates a space that should be dedicated to preserving the memory of the victims and survivors of the crimes committed here as well as the resistance fighters battling this oppression. Rather than allowing for remembrance and prayer, the site currently confronts visitors with the commotion of holiday-goers, loud music, laughter, and the smell of barbeque.

The proposed extension of Lüderitz port in Robert Harbour poses an imminent risk of further desecrating the heritage site directly and indirectly, as well as disturbing maritime burial places within the jurisdiction of Namport and adjacent waters. This would further and irreversibly compromise the island as a place of historical significance and prevent additional archeological research needed on the underwater burial sites of camp inmates. Noise from the port will permanently affect the experience of being in this site, preventing solemn contemplation. The view from the city to the former camp and vice versa, situating the atrocities committed here within its local context, will be disrupted if new buildings are constructed on the eastern side of the island.

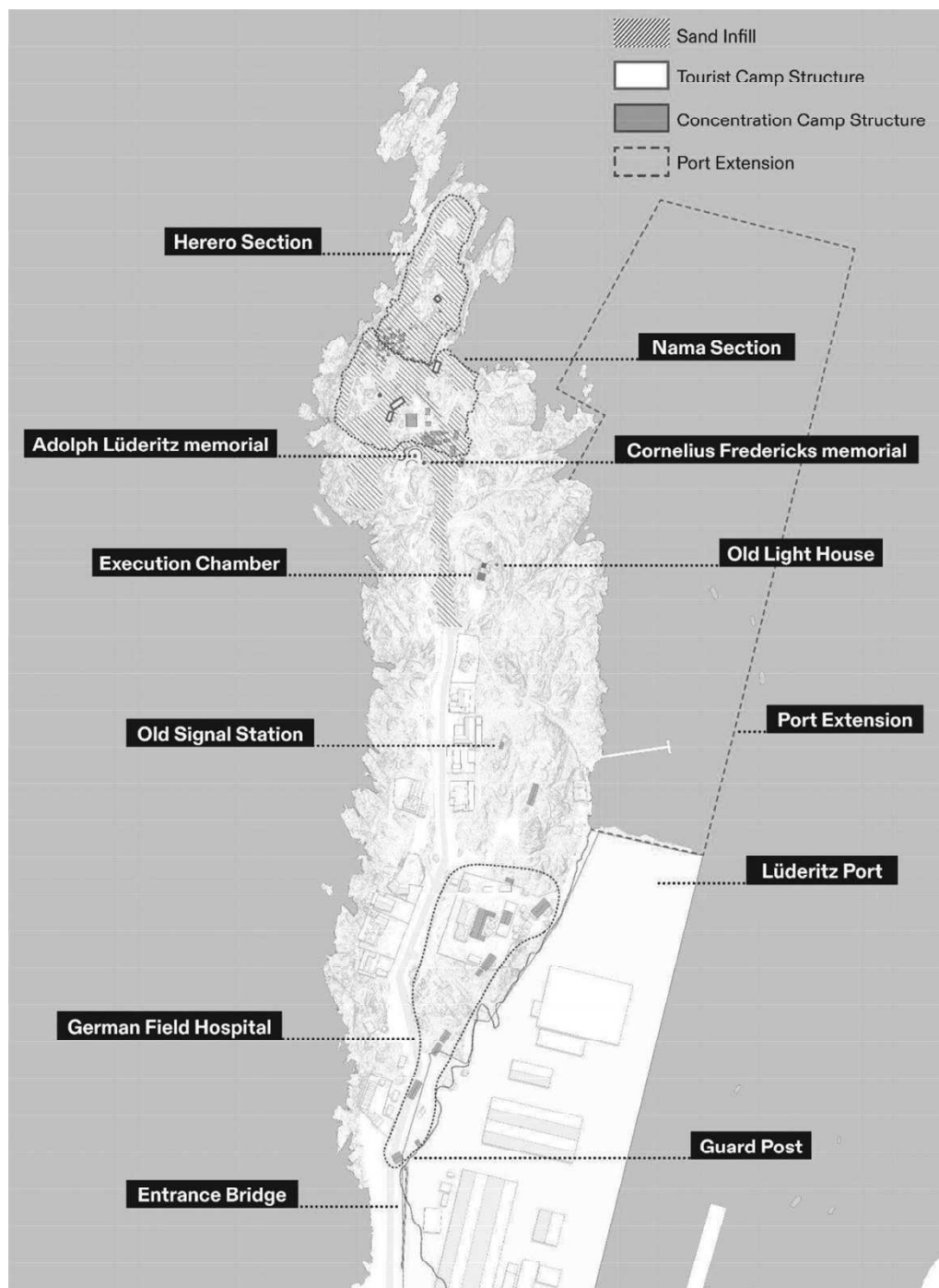


Figure 42a. Spatial analysis by Forensis/FA reveals how key sites of the concentration camp have been overbuilt and how the proposed port extension threatens to further disrupt and continue the erasure of traces.

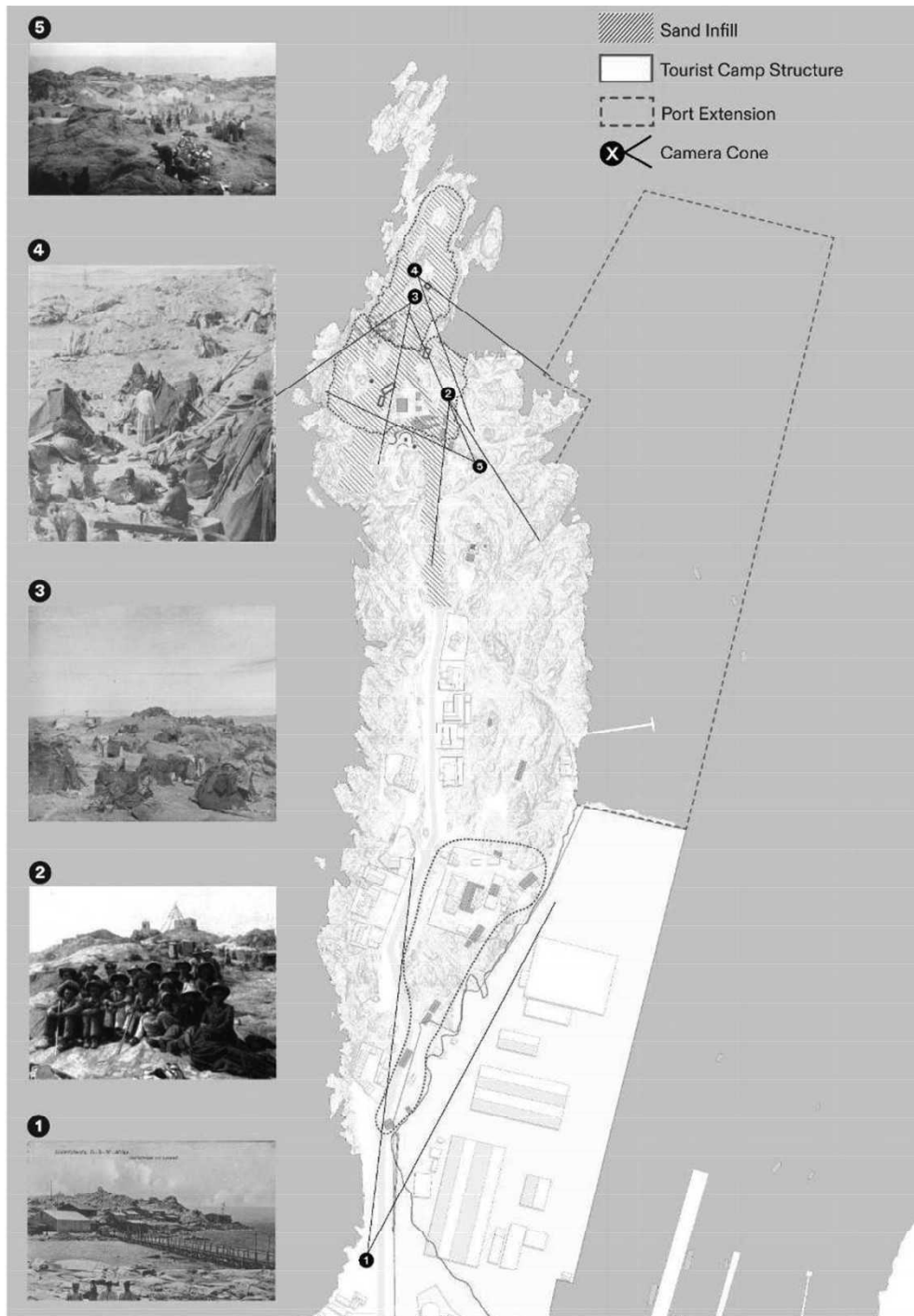


Figure 42b. Exact locations of archival photographs camera cones used for the reconstruction of Shark Island concentration camps

## 8. Localization of Unmarked Graves

Thousands of Herero and Nama inmates died in Shark Island concentration camp. Yet, until this day, the burial sites of the victims are unclear. Evidence points to multiple areas around Lüderitz as possible sites of burial.<sup>10</sup> Some of them lie in the Sperrgebiet, the area sealed-off for diamond mining since 1908 which is now slated to be used for the Hyphen Energy project. In the testimonies we collected, it was mentioned multiple times that bodies of inmates were simply thrown into the sea off Shark Island. This is substantiated by written reports, such as a South African transport rider, Leslie Cruikshank Bartlet, stating in 1905 that he saw ‘corpses of women prisoners washed up on the beach between Lüderitzbucht and the cemetery.’<sup>11</sup> It is thus highly likely that the shallow waters around the island are graves to victims of the German-made genocide. We were moreover able to gather substantial evidence for the presence of inmates’ graves in Radford Bay, which is the area that we will be concentrating on in the following.

Multiple historic sources reference inmates dying or being laid to rest on beaches around Radford Bay. For instance, a soldier passing through Lüderitz in 1906 writes that upon arrival he ‘perceived nearly 500 native women lying on the beach, all bearing indications of being slowly starved to death. Every morning and towards evening four women carried a stretcher containing about four or five corpses, and they also had to dig the graves and bury them.’<sup>12</sup> This is the first sight he records in Lüderitz. Since he is coming from South Africa, Radford Bay’s beach close to Burenkamp is the first part of town he would encounter.



Figure 43. A drone photograph capturing the unmarked graves of victims of Shark Island close to Radford Bay. FA/Forensis 2024.

<sup>10</sup> In Lüderitz Burenkamp we were able to identify a cemetery on historic maps and locate it in the current geography. Together with geo-referenced photomatches these processes show the existence of graves in these areas. We have excluded it from this report since we weren't able to conduct a GPR survey in the area.

<sup>11</sup> Union of South Africa, Report on the Natives of South-West Africa.

<sup>12</sup> Erichsen, Casper W. (2005). 'The angel of death has descended violently among them': Concentration camps and prisoners-of-war in Namibia, 1904-08. Leiden: African Studies Centre, p.80.

Close to Radford Bay (Fig. 43), a memorial next to several sand mounds honors the Nama and Herero victims of the genocide. During restoration works of the railways adjacent to this site, human remains were discovered which were then reburied in Lüderitz. Oral history points to the mounds as traces of graves of victims from the Shark Island concentration camp and others around Lüderitz. We have looked for archival images of this area during the genocide period.



Figure 44. A Contemporary satellite image of Radford Bay, Lüderitz. The marking shows the site where mounds are visible today. FA/Forensis, 2023.

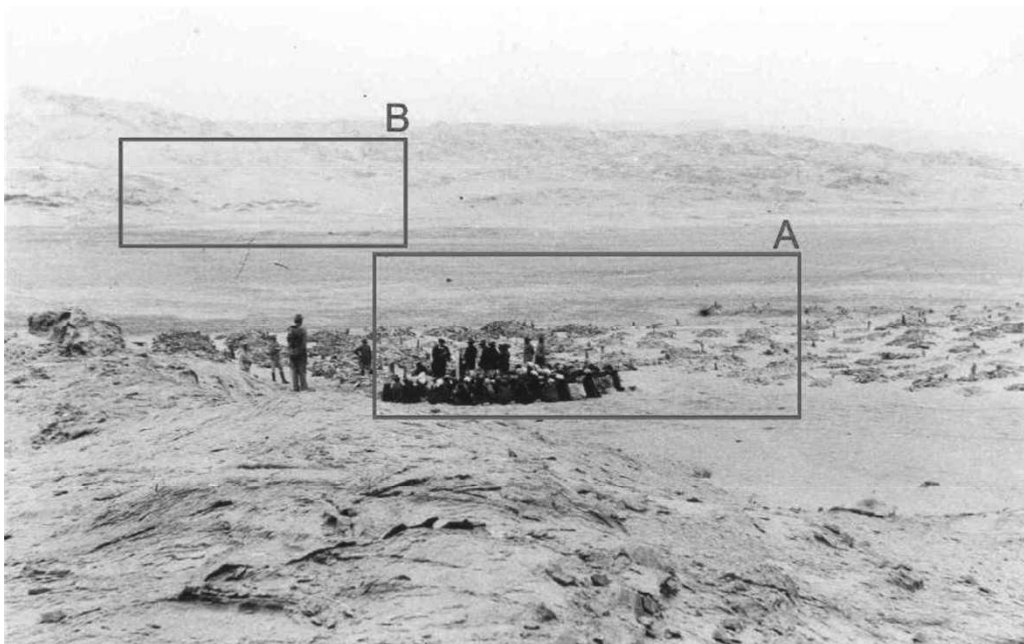


Figure 45. A photo, likely from 1906, labelled by the archive as, 'Burial of Shark Island concentration camp victims near Lüderitzbucht', shows the burial ceremony in Radford Bay. The markings indicate different grave zones. National Archives Namibia.

The archival photo (Fig. 45), likely dating to 1906, shows inmates conducting a burial in an area we identified as a plain behind Radford Bay outside of Lüderitz, the same site as Figure 44. The people visible in the centre of this image seem to be Nama, based on their clothing and head scarfs.

The burial might be staged for the photo since no other written or visual material from Lüderitz points to ritualised burials for inmates at that time. Rather, different sources point to them being disposed of in mass and individual graves dug daily by other inmates.

A closer look at the image reveals that the mounds vary in size. On the right side (Frame A) of the picture are smaller ones, indicating they might be individual graves. However, bigger mounds are visible on the left side of this image indicating that these might be mass graves.

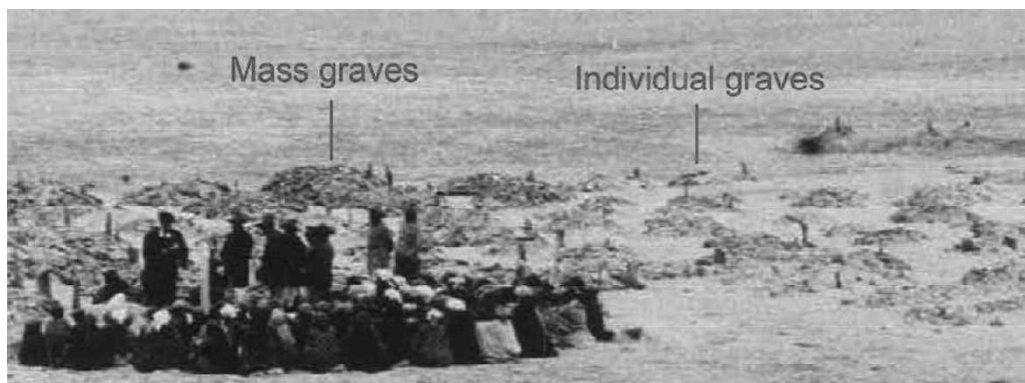


Figure 46. A zoom-in (Frame A) of Figure 45, suggests the presence of individual graves at the right of the image and mass graves on the left side.

We were able to geolocate this image to the aforementioned area (Fig. 44) by once again using a rock, visible on the left side of the image, as an anchor to photomatch its location within our 3D model. Throughout this process, it became evident that sand mounds on this site are the same as the ones visible in the archival photograph. Moreover, we can see that the railway tracks pass right above some of the graves in this image, corroborating that the human remains found on this site might be coming from these graves.



Figure 47. The same rock captured in the archival photograph (Fig. 45), is visible within the image taken by Forensic Architecture in September 2023 from the view (Right). FA/Forensis, 2024.

We were able to identify a potential burial site also in the background (Frame A) of the archival photograph. We visited this location in Lüderitz and found sand mounds very similar to the ones in the first location here as well.

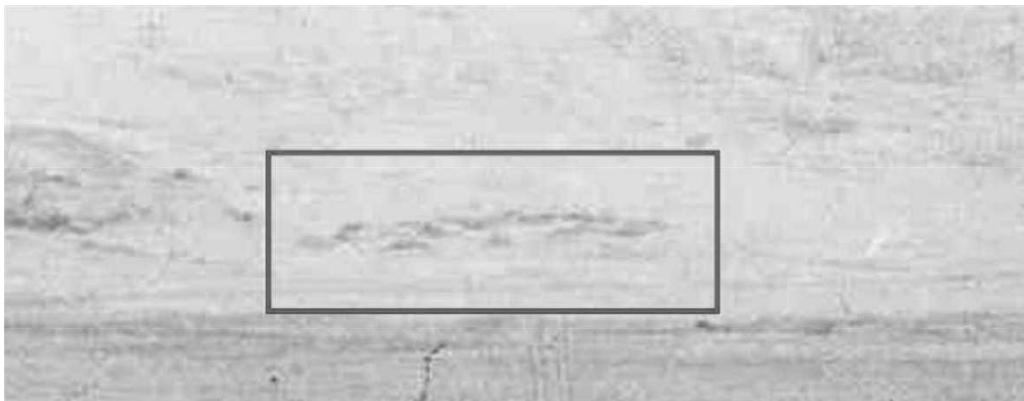


Figure 48. A zoom-In (Frame B) of Figure 45, indicates what appear to be graves in the background.

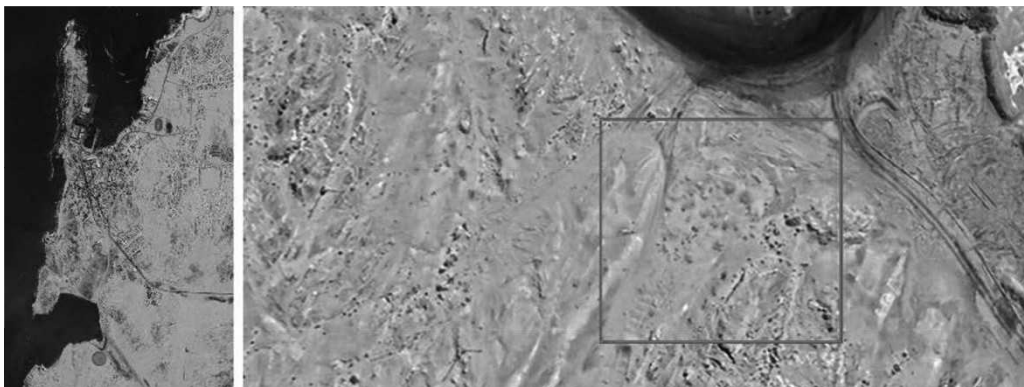


Figure 49. A Contemporary satellite image of Radford Bay, Lüderitz. The marking shows the second site where mounds are visible today. FA/Forensis, 2023.

### 8.1. GPR Survey

To further corroborate the existence of graves in the area, we collaborated with forensic archeologists from the Centre of Archaeology at Staffordshire University. The team of Prof. Caroline Sturdy Colls conducted a series of non-invasive investigations at the two sites mentioned in the previous section.<sup>13</sup>

A mix of forensic walkover investigation, Ground Penetrating Radar (GPR), UAV photogrammetry, and Global Positioning System (GPS) was employed to identify potential burial sites and map subterranean evidence.

Smaller survey areas were selected for both sites to undertake the GPR investigation. The location of these areas was chosen based on analysis of the visual and textual material and analysis of the site topography, taphonomy, and the presence of visible remains.

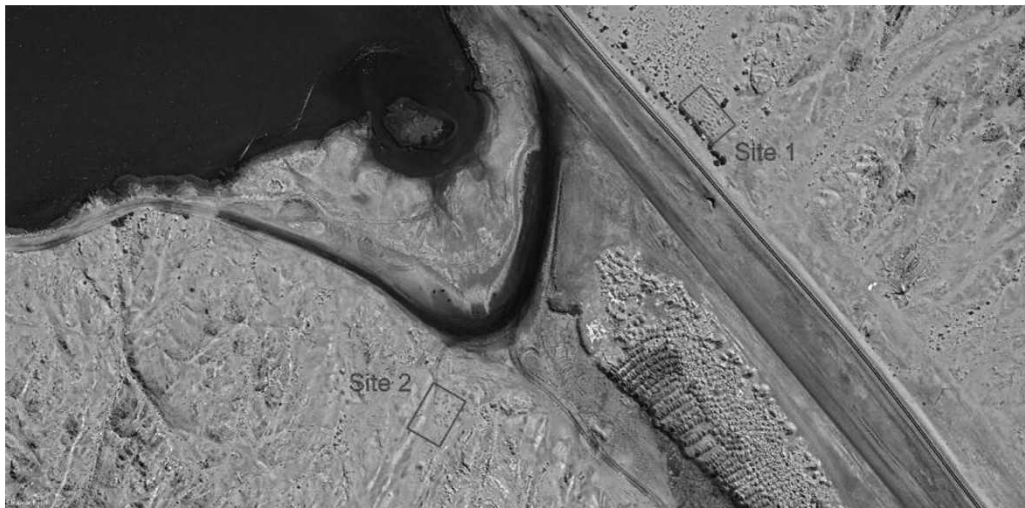


Figure 50. The locations of the survey sites in Lüderitz. Centre of Archaeology at Staffordshire University and FA/Forensis, 2024.

<sup>13</sup> Colls, Kevin and Mitchell, William (2024). A non-invasive forensic investigation of the slave cemeteries sites in Lüderitz and Swakopmund, Namibia. Centre of Archaeology at Staffordshire University.

## 8.1.1. Site 1

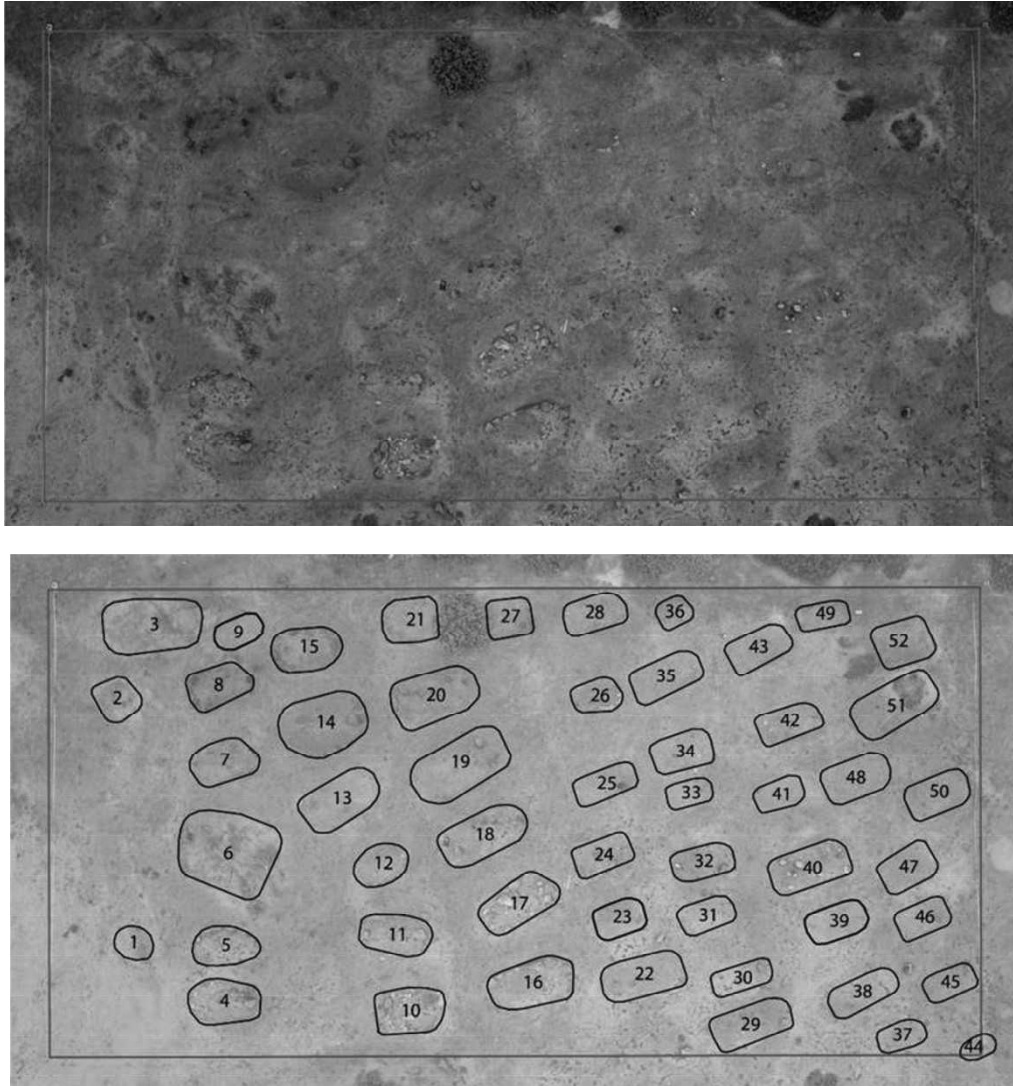


Figure 51. The detailed aerial image of the survey grid (top) shows the visible sand mounds and the feature numbers assigned to each (bottom). Centre of Archaeology at Staffordshire University and FA/Forensis, 2024.

The survey area for site 1 measures 30m by 15m, characterised by an uneven terrain of dry sand with sporadic vegetation. Within this area, 52 distinct sand mounds were observed. The survey successfully identified significant buried features, providing insights into both visible and concealed remnants at this site. Due to the abundance of visible mounds, only a representative section of this site will be elaborated upon here, encapsulating the results of the GPR survey.

The green line below indicates a section cut through the survey area at 6.5m, and it runs through seven visible sand mounds. Subterranean disturbances are detected at these locations, ranging from depths of 0.10m to 0.90m, followed by a change in geophysical response at 1m depth. Analysis suggests a high likelihood that the features along this profile represent individual graves, with feature 6 (blue box) potentially indicative of a mass grave due to its larger size. Strong signals around 1m depth may signify coffins, partially decomposed human remains, buried artefacts, or burial wrappings.

These features demonstrate a clear correlation between subterranean data and visible sand mounds on the surface.

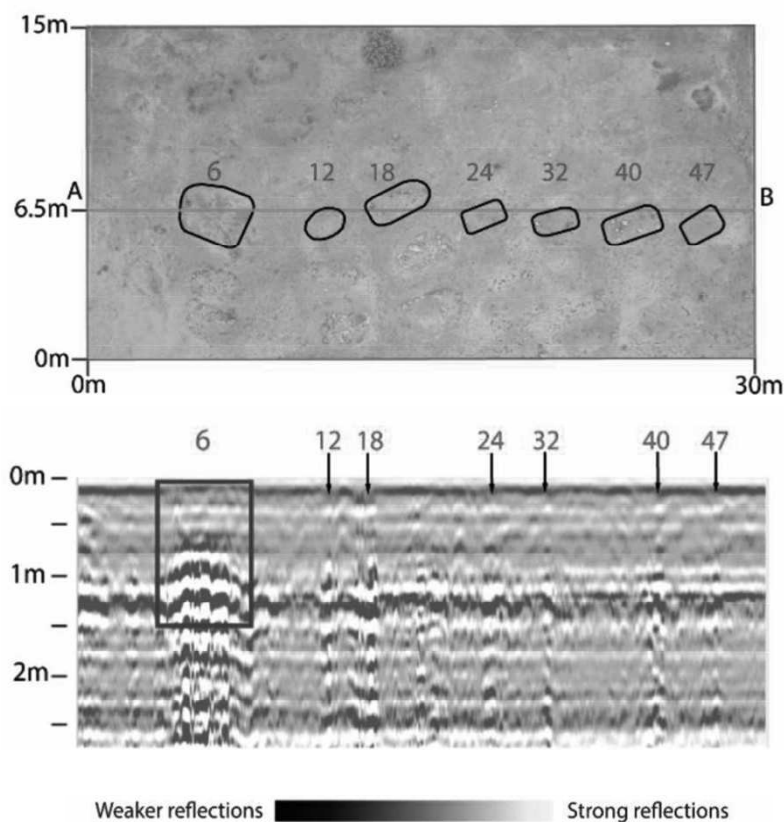


Figure 52. GPR data for features 6, 12, 18, 24, 32, 40, 47. Centre of Archaeology at Staffordshire University and FA/Forensis, 2024.

The green line below indicates a section cut through the survey area at 12.5m, and it runs through three visible sand mounds. The data suggest the presence of graves even in areas devoid of visible mounds above ground, such as feature "53" in the provided image.

Moreover what is important for feature "15" (yellow box) and "52" (blue box), is that although both of them each have one visible sand mound, the data from this section line shows two

anomalies present in each of these locations, suggesting the presence of two graves beneath each sand mound.

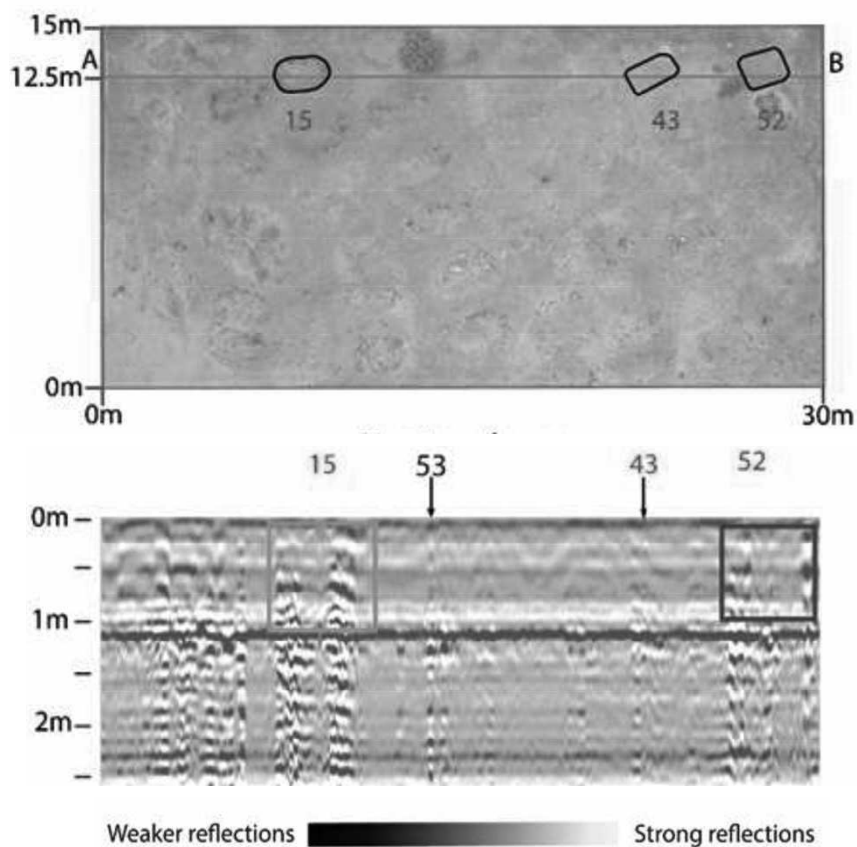


Figure 53. GPR data for features 15, 43, 52, 53. Centre of Archaeology and FA/Forensis, 2024.

## 8.1.2. Site 2

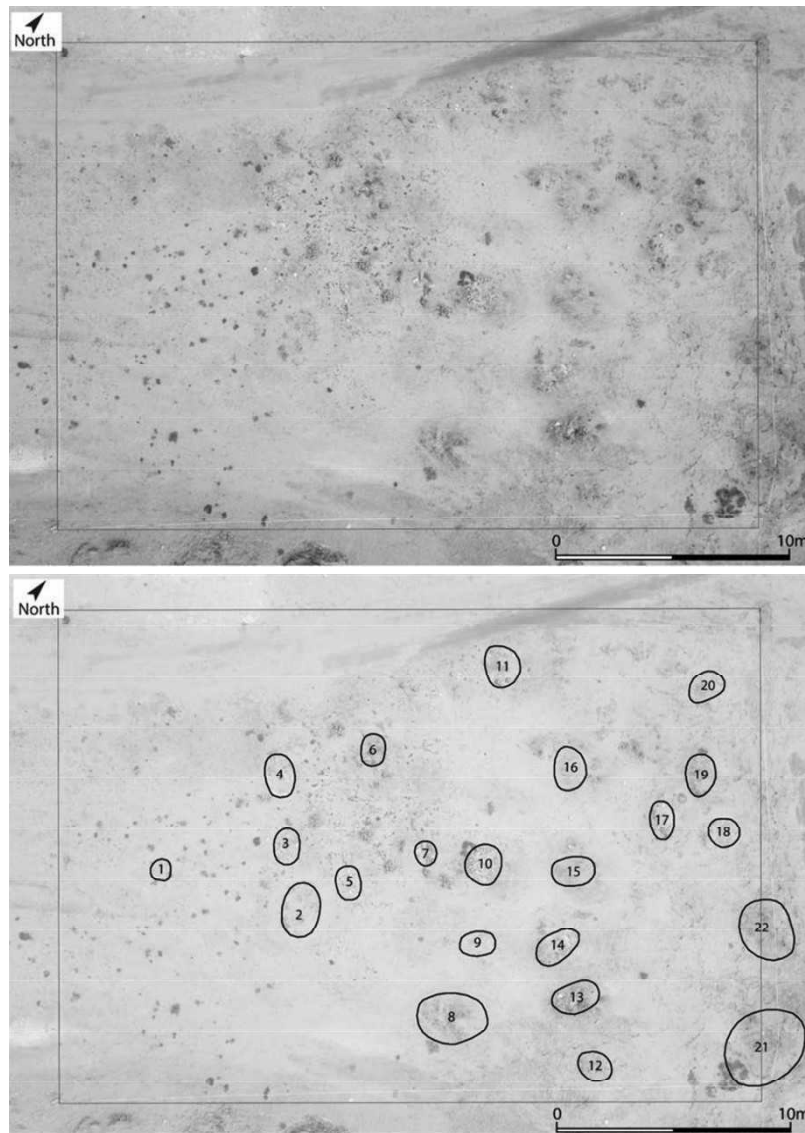


Figure 54. The detailed aerial image of the survey grid showing the visible sand mounds (left) and the feature numbers assigned to each (right). Centre of Archaeology and FA/Forensis, 2024.

The survey area for site 2 measures 30m by 19.5m, with a similar topography of dry sand sloping from southwest to northeast. As depicted in the provided image, we identified 22 visible sand mounds in this survey area. The survey successfully identified significant buried features, providing insights into both visible and concealed remnants at this site. Due to the abundance of visible mounds, only a representative section of this site will be elaborated upon here, encapsulating the results of the GPR survey.

The green line in Figure 42 indicates a section cut through the survey area at 10m, and it runs through three visible sand mounds. In this case all three features indicate anomalies below ground. The data beneath feature 3 and 18 are similar to what was observed in the previous survey area indicating a high possibility that these are graves. However, although a pit-like anomaly is observed in the vicinity of feature 7, further investigations need to take place in order to confirm it being a grave. This anomaly could be the result of natural geology or a pit or grave-like feature that is backfilled with stones rather than sand.

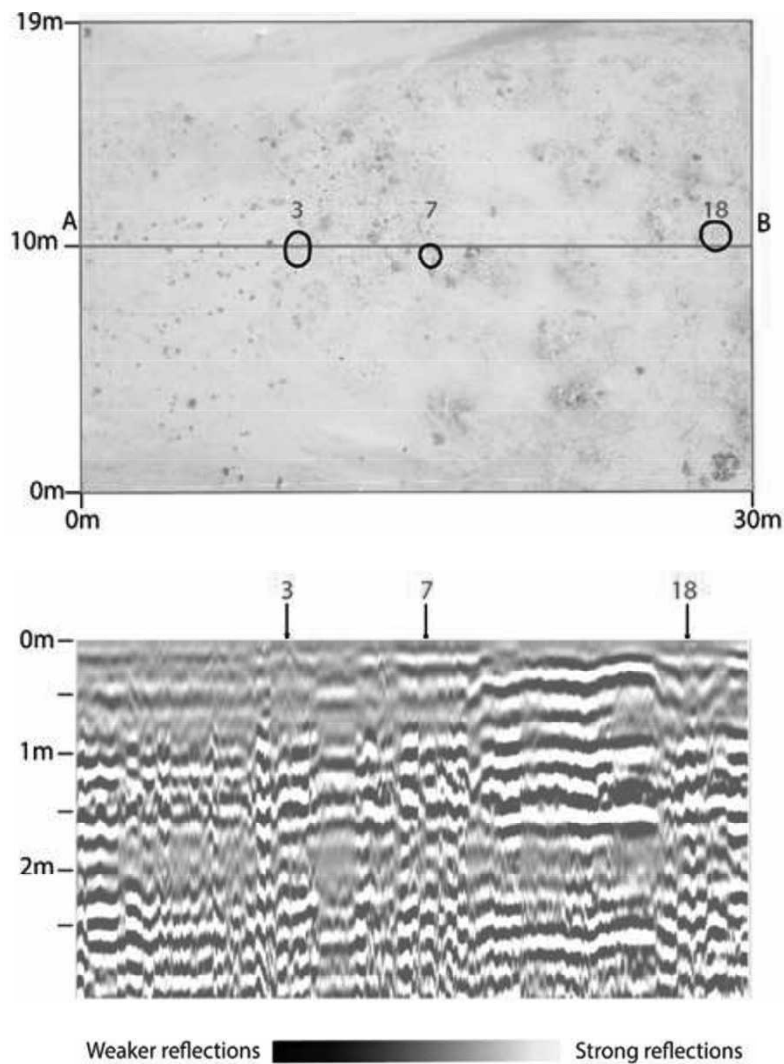


Figure 55. GPR data for features 3, 7, 18. Centre of Archaeology and FA/Forensis, 2024.

The green line in Figure 43, indicates a section cut through the survey area at 3m, and it runs through three visible sand mounds. The GPR data in this section demonstrates that not all visible sand mounds are graves. The interpretation of data presented below indicates that feature 13 may be formed from wind blown sand covering a natural geological outcrop. The visible rocks on the surface of this mound also appear to be bigger and different in form than the ones in other locations at both sites.

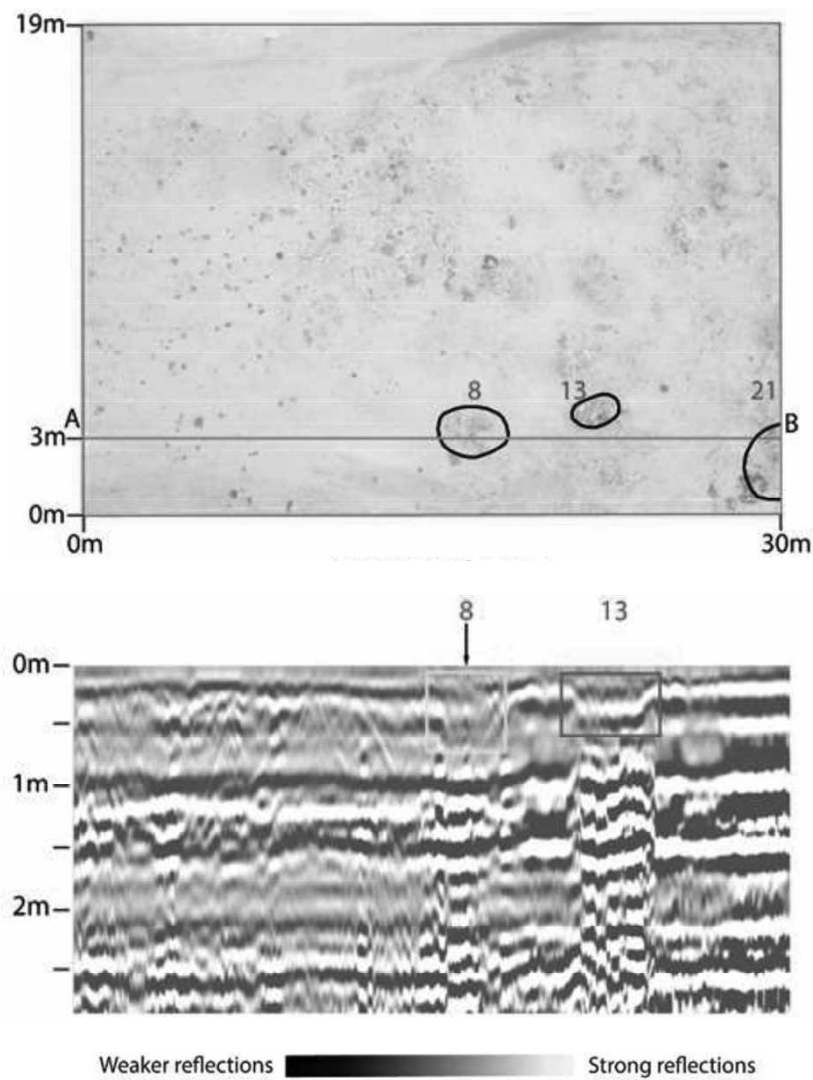


Figure 56. GPR data for features 8, 13, 21. Centre of Archaeology and FA/Forensis, 2024.

## 8.2. Findings

Our analysis has revealed the following findings:

- I. In two identified sites our analysis of all available data proves with high likelihood the presence of graves.
- II. Based on archival imagery analysis and in-depth interviews and testimony collection with descendants of survivors from Shark Island as well as oral historians, the identified graves have a high probability of containing human remains of Nama and Herero inmates killed in the Shark Island concentration camp.
- III. Ground-penetrating radar (GPR) analysis of the identified sites indicate both individual and mass graves.
- IV. In survey area 1, the GPR data confirms the likelihood that all 52 recorded mounds relate to anomalies beneath the ground and that these can be interpreted as graves. Of these, three are larger than the others that are likely to be mass graves (features 6, 19 and maybe 3). The analysis also suggests that at least 5 other graves are present but without visible mounds on the surface. Therefore the total number of identified graves in this area would be 58 graves, with three showing indications of being larger than the rest.
- V. In survey area 2, the GPR data confirms the likelihood that at least 4 recorded mounds relate to anomalies beneath the ground and that these can be interpreted as graves. However the data suggest that up to 6 more graves might be present in this area.

## 9. Recommendations

### 9.1. Shark Island

Our findings show that the extensive terraforming and the geological alteration that Shark Island has undergone substantially compromised it as a place of historical significance. The tourist camp's infrastructure, such as roads or sanitary facilities, are situated directly on top of the former concentration camp, thus, of an area of archaeological, historical, religious and emotional significance.

We recommend preserving the entire island and the waters surrounding it, including the geology with its traces of forced labour. Further research in the form of archeological surveys is needed to better understand the living and working conditions in the concentration camp. Lastly, the site needs to be dedicated to remembrance, honoring the victims and survivors of the genocide and the resistance fighters that battled the oppression by the German Imperial power.

## 9.2. The port and the seabed surrounding Shark Island

The proposed extension of Lüderitz port in Robert Harbour poses an imminent risk of further desecrating the heritage site directly and indirectly, as well as disturbing maritime burial places within the jurisdiction of Namport and adjacent waters. Noise from the port will permanently affect the experience of being in this site, preventing solemn contemplation. The view from the city to the former camp and vice versa, situating the atrocities committed here within its local context, will be disrupted if new buildings are constructed on the eastern side of the island.

Written and oral testimonies speak to the presence of human remains in the waters around Shark Island extending beyond the low water mark. Many inmates who were killed or died in the camp were never buried, but thrown into the waters now within Namport's jurisdiction. The terraforming, quay wall construction and land reclamation, including the dredging of material from the seabed close to Shark Island, entailed by the present plans for a port expansion form a serious risk of disturbing human remains and burial places. These sites are protected under Namibia's Burial Place Ordinance 27 of 1966.<sup>14</sup>

To ensure the holistic preservation of Shark Island as a Heritage Site in the true meaning of the term, Forensis and FA recommend an immediate and permanent moratorium on all construction on top of or in direct vicinity of Shark Island. Moreover, we recommend a holistic, non-invasive archaeological study of the seabed surrounding the island, which constitutes a burial place for many victims of the genocide.

## 9.3. Burial Sites

The GPR survey of the two sites discussed in the previous sections strongly suggests the presence of graves in both locations. This clearly indicates the urgency to seal off and preserve these areas and their immediate surroundings, while further forensic and archeological investigations are being conducted. Currently most of these protected grave sites are in poor condition and subject to erosion if immediate conservation measures are not undertaken.

In line with the archaeological assessment by the Centre of Archaeology at Staffordshire University, Forensis and FA recommend the full archeological study of the sites, expanding the size and scope of the analysis already carried out. This expansion both includes the increase in size of the GPR-survey area (as the sites analysed only represent a small sample of the overall area that likely contains graves) and scope, including community-led excavations confirming the presence of buried human remains and providing further insight into the circumstances surrounding their death.

<sup>14</sup> Burial Place Ordinance, OG 2728, Republic of Namibia (1966).  
<https://www.lac.org.na/laws/annoSTAT/Burial%20Place%20Ordinance%2027%20of%201966.pdf>

## About Forensic Architecture and Forensis

Forensic Architecture (FA) is a research agency, based at Goldsmiths, University of London. FA's Berlin-based sister agency Forensis e.V. was founded to expand upon this work<sup>15</sup>. The teams include architects, scientists, academics, journalists, technology experts and other specialised professionals and experts. Forensic Architecture undertakes advanced architectural and media research on behalf of international prosecutors, human rights organisations, as well as political and environmental justice groups. Since 2011, FA have published more than ninety investigations worldwide including in Pakistan, Indonesia, Myanmar, Guatemala, Mexico, Chile, Brazil, the US, UK, Germany, Turkey, Ukraine and Greece.

Our investigations employ pioneering techniques in spatial and architectural analysis, open-source investigation, digital modelling, and immersive technologies, as well as documentary research, situated interviews, and academic collaboration. Findings from our investigations have been presented in national and international courtrooms, parliamentary inquiries, and exhibitions at some of the world's leading cultural institutions and in international media, as well as in citizen's tribunals and community assemblies.

FA's case files have been submitted as evidence in national legal processes across the world, including in Israeli courts. The agency's findings have also been submitted or presented in international jurisdictions including the European Court of Human Rights and the UN General Assembly, and in national courtrooms, parliamentary inquiries, and truth commissions around the world.

Forensic Architecture has been recognised for its work in the field of journalism with a Peabody Award for Digital and Interactive Storytelling (2021), the European Cultural Foundation (ECF) Princess Margriet Award for Culture (2018), the Designboom Design Prize for Social Impact (2019), and a Peabody-Facebook Futures of Media Award for Interactive Storytelling (2017). FA director Eyal Weizman is a life fellow of the British Academy and recipient of an MBE for 'services to architecture'. He is a member of the Technology Advisory Board of the International Criminal Court in The Hague and is on the board of the Centre for Investigative Journalism.

Forensis is the co-recipient of the "Daphne Caruana Galizia Prize for Journalism 2023" for the investigation on the Pylos Shipwreck.

More information on our casework available at: [www.forensic-architecture.org](http://www.forensic-architecture.org) & <https://counter-investigations.org>

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<sup>15</sup> References to 'FA' throughout this document should be understood to refer jointly to the activities, and findings, of FA and Forensis together.

**NTLA Nomination to Declare Shark Island as World Heritage Site: 11 March 2025**

13 February 2024

**Lüderitz Port Extension endangering sites  
of the 1904–1908 genocide**

To whom it may concern,

**Re: urgent need for an immediate moratorium on all planned construction in the immediate vicinity of Shark Island, and archaeological study and preservation of Shark Island and related sites.**

We write in light of two years of research conducted with and for the **Nama Traditional Leaders' Association (NTLA)** and the **Ovaherero Traditional Authority (OTA)**. That research, conducted by [Forensis](#) and [Forensic Architecture \(FA\)](#), examined key sites of historical relevance to the 1904-08 genocide perpetrated by German colonial troops against the Nama and Ovaherero indigenous peoples.

As part of this research, Forensis and FA have conducted archaeological analysis on Shark Island, the site of a concentration camp run by the German colonial administration between 1905-1908. During this period, Ovaherero and Nama prisoners were subjected to detention, brutal intimidation, forced labour, torture, sexual abuse and execution. As such, Shark Island is a place of utmost historical and cultural significance, not only for the descendant communities but for the Namibian society as a whole, and one that must be preserved in its entirety for generations to come.

Shark Island and its surroundings are within the ancestral lands of the Nama people. As historical inhabitants and stewards of this land, the Nama people, represented by the NTLA, are entitled to exercise their right to free, prior and informed consent as defined in the United Nations Declaration on the Rights of Indigenous Peoples. As such, the Nama are entitled access to the full and up to date plans for all construction on this land and the relevant studies and reports for any of these projects. Thus far, NTLA has not been consulted.

**We hope that this letter paves the way for a relationship of transparency between Namport and the NTLA and OTA, and we hope to identify together a fair and just course of action regarding all infrastructural development planned on ancestral Nama land. No development should be taking place at the expense of the memory and dignity of the victims of the genocide.**

## Research Findings

Our team has gathered new testimonies from descendants of genocide victims, archival materials, historical aerial imagery, contemporary drone footage, and colonial records.

Our findings to date reveal the following:

- 1- Present-day infrastructure, including tourist facilities, roads, residential development and port infrastructure have been built atop the former concentration camp, irreversibly compromising it as a place of historical significance.
- 2- The proposed extension of Lüderitz port in Robert Harbour, poses an imminent risk of further desecrating the heritage site directly and indirectly, as well as disturbing burial places within the jurisdiction of Namport and adjacent waters.**
- 3- In collaboration with archaeologists, the team has identified and surveyed unmarked graves linked to the genocide perpetrated against the Ovaherero and Nama, located on the outskirts of Lüderitz. These burial places are within areas slated for development by Hyphen, whose activities related to green hydrogen production and export are among the main motivations for the port expansion.

## Impact of proposed construction plans

Informed by the research findings, we believe an immediate moratorium is needed for the following reasons:

### 1- Cultural impact

The port expansion will interfere with the ability of the Nama and Ovaherero peoples to commemorate the site of the former concentration camp. It will do so by:

- a. Interfering with the ability for peaceful memorialisation on the Island due to high levels of noise and visual pollution. The port's structure is likely to pose a heavy physical and visual presence on the Island immediately adjacent to where the former concentration camp was located, and where descendants commemorate their ancestors.
- b. Posing a high risk to damage the Island, its future memorial structures, and its burial places due to the handling of highly toxic and flammable materials. The descendants of Shark Island's victims are unable to accept any amount of risk to the site or the burial places on and around the Island.
- c. Blocking the line of sight of the Island, particularly the sites of the former camps, from the town centre. Descendants of Shark Island prisoners testify that their

ancestors were executed on a high point of the island, adjacent to the lighthouse (see centre of map, Figure 1) - a brutal and intentional act of public humiliation and intimidation of the indigenous population. This line of sight is therefore central to the Heritage Site of Shark Island and as such must be preserved to retain the site's historical and cultural value.

We highlight Namport's obligations towards the protection and conservation of heritage sites under the National Heritage Act.

## **2- Destruction of potential underwater human remains & gravesites**

Written and oral testimonies speak to the likely presence of human remains in the waters around Shark Island extending beyond the mean low water mark. Many prisoners that were killed or died in the camp were never buried, but instead thrown into the waters now within Namport's jurisdiction. Therefore, there is a credible and substantial risk that human remains lie within the bounds of the proposed expansion.

The terraforming, quay wall construction and land reclamation (including the dredging of material from the seabed close to Shark Island), entailed by the present plans run a serious risk of disturbing human remains and burial places. These sites are protected under Namibia's Burial Place Ordinance 27 of 1966.<sup>1</sup>

### **Demands**

Based on the outlined concerns, NTLA, OTA, FA and Forensis strongly object to the planned construction activity. We demand:

- 1. An immediate and permanent moratorium on all construction whether on top of or in direct vicinity of Shark Island.**
- 2. A holistic, non-invasive, archaeological study of the entire area of Shark Island and its vicinity, including the surrounding seabed, which constitutes a burial place for many victims of the genocide.**
- 3. Preservation of Shark Island as a Heritage Site in the true meaning of the term, as well as related burial places.**

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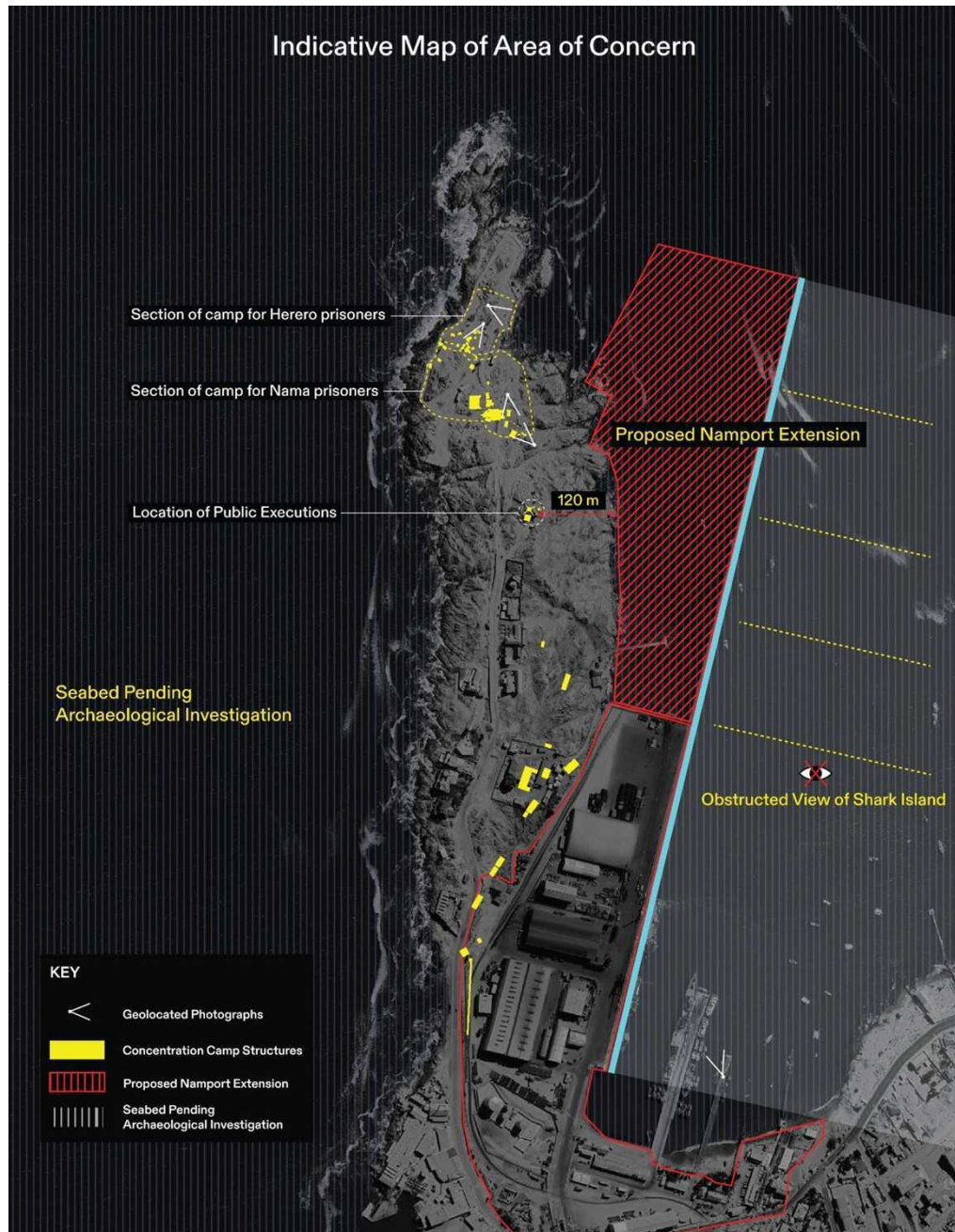
<sup>1</sup> Burial Place Ordinance Law 27 of 1966:

<https://www.lac.org.na/laws/annoSTAT/Burial%20Place%20Ordinance%2027%20of%201966.pdf>

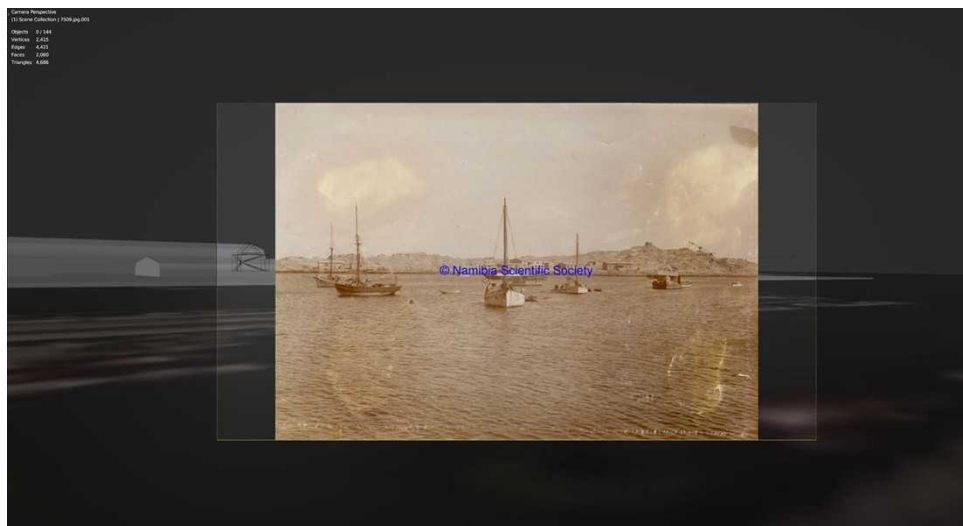
The undersigned parties request that the following concrete demands be met:

4. The development of an alternative plan for the Phase 2 expansion of the Lüderitz Port, as required under the Environmental Management Act and informed by the outcomes of the environmental impact assessment, to be shared with the above parties.
5. NTLA and OTA to be included in all forthcoming consultation processes pertaining to this development, in line with international human rights law protecting the rights of indigenous and tribal peoples.
6. The full and up to date report on the environmental and cultural impacts of the project be sent to the signed parties.
7. A representative of Namport to attend an event organised by NTLA and OTA in April 2024 in Lüderitz – details will be provided in an invitation to follow.

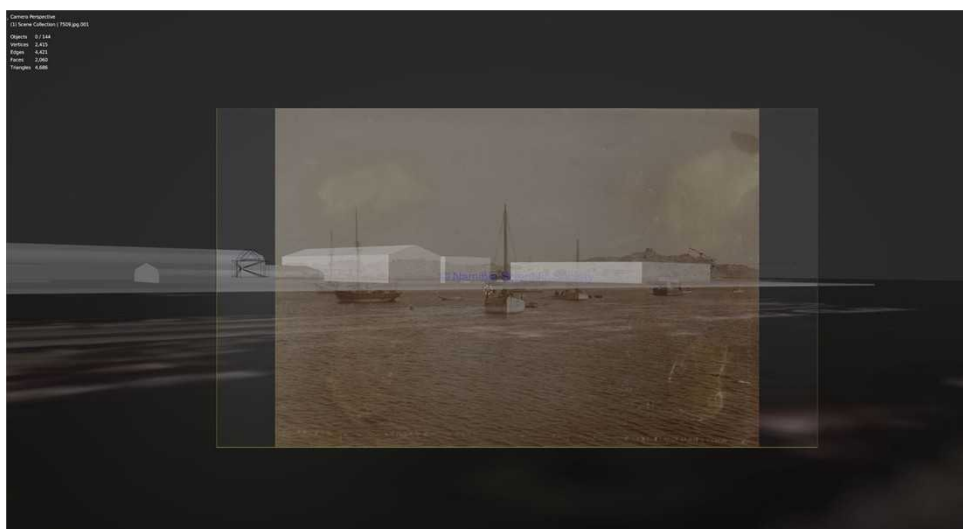
NTLA, OTA, FA and Forensis have begun to inform stakeholders, decision makers and human rights organisations on national and international level regarding the planned construction and reserve the right to further intervene in this process. We have also shared our research findings with local and international media outlets and journalists.



**Fig. 1** - Spatial analysis by Forensis/FA reveals how key sites of the concentration camp have been overbuilt and how the proposed port extension threatens to further disrupt and continue the erasure of traces.



**Fig. 2** - Camp infrastructure visible on Shark Island in archival images retrieved from the Namibian Scientific Society, showing the view from the bay and part of Lüderitz towards Shark Island.



**Fig. 3-** Using precise 3D models and plans released by Geo Pollution Ltd. of the Namport extension, the 700m extension with potential build-up infrastructure for storage and processing disturbs the line of sight onto the island.



**Fig. 2** - Forensis/FA have confirmed known and identified new mass graves around Radford Bay that likely hold the human remains of executed prisoners from Shark Island concentration camp (marked as site 1,2 & 3). Many more sites are suspected in adjacency (marked in tainted red on the map) to these sites of which only a small sample was analysed by forensic archaeologists.

## About Forensis and FA

Forensic Architecture (FA) is a research agency, based at Goldsmiths, University of London since 2011. Forensis was founded in 2021 in Berlin by members of FA, as a not-for-profit association (e.V.). The two agencies work for and in collaboration with individuals and communities affected by human rights violations, to support their demands for justice, reparations and accountability.

Our investigations employ cutting-edge techniques in spatial and architectural analysis, open-source investigation, digital modelling, immersive technologies, as well as documentary research, interviews and academic collaboration. Our findings have been presented in national and international courtrooms, truth commissions, parliamentary inquiries in Germany and around the world, and exhibitions at world-leading cultural institutions and in international media.

**We sincerely thank you for considering the issues raised herein and look forward to hearing from you. We hope to receive a response on this urgent matter within 14 days.**

Sincerely yours,

Paramount Chief Mutjinde Katjiua, Ovaherero Traditional Authority

Sima Luipert, Nama Traditional Leaders Association

Eyal Weizman, Forensic Architecture/Forensis



**Letter from European Center for Constitutional and Human Rights: 26 January 2026**



**NAMA TRADITIONAL LEADERS ASSOCIATION**

PO Box 2097, Keetmanshoop, Namibia

**Enquiries:** Maboss Johannes

Ortmann

**Email:** [maboss.ortmann@gmail.com](mailto:maboss.ortmann@gmail.com)

**Mobile:** +264 81 438 1393

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**The Director National Heritage Council**

**Ms. Erica Ndalikokule**

**52 Robert Mugabe Avenue**

**Windhoek, Namibia**

**Date: 11<sup>th</sup> March 2025**

Dear Ms Ndalikokule

**RE: NOMINATION OF SHARK ISLAND AS A WORLD HERITAGE SITE**

The aforementioned subject matter bears reference.

The Nama Traditional Authorities Association (NTLA) comprises of the ten Nama Traditional Authorities, legally gazetted in terms of the Traditional Authorities Act, 2000 (No 25 of 2000).

The main objectives of the NTLA are to promote unity amongst the Nama community, upliftment of their socio-economic conditions and to correct historic injustices. The fight for restorative justice for GENOCIDE committed against the Nama and the Ovaherero by the German Colonial power has remained a core issue for the Nama and Ovaherero leadership. The right to self-participation during the negotiations between the governments of Namibia and Germany has been a key human right which the Nama leadership has been fighting for, but were sadly excluded.

It is against the aforesaid that the NTLA hereby nominate Shark Island situated on the southwestern coast of Namibia as a world heritage site. Shark Island also known as the "Death Camp" was opened as a concentration camp in 1905 at the height of the German Genocide against the Nama and the Ovaherero peoples and closed in 1907.

I am attaching herewith as annexure A- full historical background of the Shark Island Concentration camp, and a research report which was conducted by Forensic Architecture (FA), and link to the Shark Island documentary also produced by FA.

Furthermore, I would like to bring to your attention Namport's aggressive pursuit to extend the current harbor in Luderitz which is adjacent to Shark Island. The extension of the harbor will have a negative impact on the historical, heritage and cultural significance of the sacred site.

Shark Island and its surroundings are within the ancestral lands of the Nama people. As historical inhabitants and stewards of this land, the Nama people, represented by the NTLA, are entitled to exercise their rights to free, prior and informed consent as defined in the United Nations Declaration on the Rights of Indigenous Peoples. It is at this very Shark Island that over 4000 Nama and Ovaherero people died in the most horrific circumstances. Some were decapitated, some died



of extreme weather conditions, others simply worked to death. Many more ran in the cold Atlantic waters and were eaten by the sharks.

Hence on the bottom of the Atlantic Ocean surrounding Shark Island lies our ancestors. It is against aforesaid and for more obvious reasons that we further request that as per the best practice a buffer zone be set up around the surroundings of Shark Island. Further we request the National Heritage Council, once again, to implement the Cabinet Directive that Namibia Wildlife Resorts stop its tourism activities on Shark Island. Your office will appreciate that this is a long outstanding directive which has not been executed with the due diligence it deserves

Dear Ms. Ndalikolule, please be assured of our highest regard for your office, as we continue to work together to find a solution to this painful heritage.

Please do not hesitate to contact me personally at **+264 81 438 1393**.

Yours faithfully

**JOHANNES ORTMANN**

**COO/ PROJECT COORDINATOR**



**Letter from Forensic Architecture: 26 January 2026**

# EUROPEAN CENTER FOR CONSTITUTIONAL AND HUMAN RIGHTS



ECCHR e.V., ZOSSENER STR. 55-58, 10961 BERLIN, GERMANY

Chief Executive Officer: Mr. Andrew Kanime  
The Namibian Ports Authority (Namport)  
No. 17, Rikumbi Kandanga Road  
Walvis Bay, Namibia

Berlin, 26.01.2026

## **RE: Support for the Formal Objection of the Nama Traditional Leaders Association (NTLA) to the Proposed Phase 1 Land Reclamation and Port Expansion at Lüderitz**

Dear Mr Kanime,

ECCHR is an independent, non-profit legal and educational organization dedicated to enforcing civil and human rights worldwide. It was founded in 2007 to protect and enforce the rights guaranteed by the Universal Declaration of Human Rights, as well as other human rights declarations and national constitutions, through legal means. Together with those affected and partners worldwide, ECCHR uses legal means to end impunity for those responsible for torture, war crimes, sexual and gender-based violence, corporate exploitation and fortified borders.

Since 2018, ECCHR has worked with the Nama Traditional Leaders Association and other groups representing the Ovaherero on reparations and justice for the genocide and other crimes committed during German occupation and colonialism of then German South-West Africa. Together, we have made submissions to different Special Rapporteurs and other human rights mechanisms of the United Nations and conducted other advocacy initiatives in Germany and Namibia in order to advance the full recognition of the crimes committed and reparations for the affected communities and descendants of victims.

In 2022, we introduced our long-standing partners, Forensic Architecture and Forensis to the NTLA to conduct joint research on the history of the genocide and other sites and events of importance to Nama resistance against colonial oppression, dispossession and exploitation. Until today, they have carried out investigations on Shark Island, Swakopmund, Hornkranz and other locations.

Drawing on this extensive body of research,

- we express our full and unequivocal support for the submission made by the Nama Traditional Leaders Association (NTLA) regarding the Environmental Impact Assessment (EIA) for the proposed Lüderitz port expansion;
- we support the NTLA's objection to the proposed Phase 1 land reclamation and port expansion at Lüderitz.

We are concerned that the current EIA process does not adequately involve the NTLA as an indigenous group and custodian of Shark Island and its surrounding land and water in order to get their Free, Prior and Informed Consent as demanded by International Law.

Sincerely,

Anne Schroeter

EUROPEAN CENTER FOR  
CONSTITUTIONAL AND  
HUMAN RIGHTS e.V.

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VORSTAND:  
DIETER HUMMEL  
ALBERT KONCSEK  
LOTTE LEICHT  
TOBIAS SINGELNSTEIN

GENERALSEKRETÄR:  
WOLFGANG KALECK

Forensic Architecture is a multidisciplinary research group based at Goldsmiths, University of London, that uses architectural techniques and technologies to investigate cases of state violence and violations of human rights around the world.

Goldsmiths, University of London  
8 Lewisham Way  
London SE14 6NW  
United Kingdom

[forensic-architecture.org](http://forensic-architecture.org)

London, 26 January 2026

To: André Faul  
Geo Pollution Technologies (Pty) Ltd  
PO Box 11073  
Windhoek, Namibia

**Re: Support for the Formal Objection of the Nama Traditional Leaders Association (NTLA) to the Proposed Phase 1 Land Reclamation and Port Expansion at Lüderitz**

Forensic Architecture (FA) is an investigative research agency based at Goldsmiths, University of London. The agency undertakes advanced spatial and media research into cases of human rights violations, working with communities affected by political violence, human rights organisations, international prosecutors, and environmental justice groups. Our research has been admitted as evidence before courts and tribunals around the world—including in the United States, United Kingdom, Germany, Greece, Israel, Colombia, and Guatemala—and our investigations have been submitted to the International Court of Justice, European Court of Human Rights, and presented before the United Nations General Assembly.

Since 2022, Forensic Architecture and our partner organisation Forensis has worked in close partnership with the Nama Traditional Leaders Association (NTLA). Under their leadership, our research process has been grounded in community expertise, oral histories, and cultural knowledge. The interdisciplinary team I have led has carried out multi-year investigations into key sites of colonial genocide across Namibia, including Shark Island, Swakopmund, Hornkranz and other locations central to the history of violence and dispossession. In my capacity as Advanced Researcher and Researcher-in-Charge of this portfolio of projects, I have applied my expertise in spatial analysis and environmental reconstruction to support the NTLA's heritage claims and ensure the technical robustness of our findings.

Forensic Architecture [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

Drawing on this extensive body of research, I write to express our full and unequivocal support for the submission made by the Nama Traditional Leaders Association (NTLA) regarding the Environmental Impact Assessment (EIA) for the proposed Lüderitz port expansion.

Based on this long-term, collaborative research relationship and our full confidence in the NTLA's standing as the Traditional Authority representing descendants of genocide survivors, FA strongly supports the NTLA's objection to the proposed Phase 1 land reclamation and port expansion at Lüderitz. In my capacity as Researcher-in-Charge and

We are concerned that the current EIA process does not adequately reflect the historical, spatial and cultural significance of Shark Island and its surrounding waters, nor the established rights of the NTLA.

Given the gravity of these concerns and the irreversibility of potential harm, FA supports the NTLA's call for all reclamation, dredging, and construction activities in this area to be halted.

Should Namport seek alternative pathways, we also support the NTLA's demand for meaningful, good-faith engagement grounded in Free, Prior and Informed Consent and in reparative, enforceable mechanisms. We reiterate that any development affecting this landscape must proceed only with the NTLA's full and informed consent.

Sincerely,

Agata Nguyen Chuong  
 Researcher-in-Charge

On behalf of Forensic Architecture

**Correspondence Prior to onset of the Environmental Assessment Process for the Phase 2  
Port Expansion Project**

----- Forwarded Message -----

**Subject:** Namport Extension Shark Island

**Date:** Mon, 29 Jan 2024 17:07:56 +0000

**From:** Jasper Julius Humpert <[REDACTED]>

**To:** [pi\[REDACTED\]com](#), [c\[REDACTED\]na](#), Agata Nguyen Chuong  
 <[REDACTED]org>, Ashkan Cheheltan <[REDACTED]>,  
 Tobechukwu Onwukeme <[REDACTED]>, [REDACTED]er-  
 [REDACTED]g

To whom this may concern,

I am writing to you as part of the research and investigation team from Forensic Architecture, Goldsmiths College, University of London and its Berlin-based sister agency Forensis (here in CC).

As a joint investigative research agency, we research together with and on behalf of victim communities suffering human rights abuses through state, corporate and environmental acts of violence. As an internationally acclaimed human rights research group our work has featured prominently in international and national courts, parliamentary inquiry committees around the globe and different cultural forums.

I am getting in touch with you as we have carried out critical research activities together with our partner organisations NTLA and OTA, representing the Nama and Ovaherero nations in Namibia, with specific attention to colonial sites of atrocities in Lüderitz. Our research has focused on the in-depth forensic and archaeological analysis of the former concentration camp operated by German colonial troops on Shark Island. Using spatial research techniques we have located the precise locations of former camp infrastructure as well as located sites of burial and mass graves around Shark Island linked to the concentration camp.

These sites represent important cultural heritage and need urgent protection. We are aware of the ongoing planning of the Namport extension as well as the environmental impact assessment that is being carried out by your organisations. The planned constructions are putting these sites in significant danger and risk destruction, obstruction and the further reinforcement of a disputed status quo on how the heritage sites are dealt with. As far as we and our partners are concerned there has not been any attempt of genuine consultation of the relevant communities regarding this project.

I am writing to you to kindly request a statement and all relevant information regarding the protection of endangered heritage sites linked to planning permissions and the timeline as well as processes of participation within the environmental impact assessments.

Forensic Architecture and Forensis remain available for conversation to be informed about the precautionary measures and community engagement planned in relation to the port extension.

We are looking forward to hearing from you.

Best,

**Jasper Julius Humpert** (he/him)

Research - Communications

**FORENSIS // INVESTIGATIVE COMMONS**

[\[REDACTED\]](#)

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Namibia

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Fax: Int +264 61 234953  
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Toni Hancox (Director)

Corinna van Wyk  
Chloe Ashley Brandt

## LEGAL ASSISTANCE CENTRE

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JP Karuaihe Human Rights Excellence Award – 2008, 2010, 2014, 2016 and 2020 and Social Responsibility Award – 2013

21 June 2024

Our Ref: GH\_cultural / heritage rights\_cjvw

NAMPORTS AUTHORITY  
Executive Committee  
Namibia

Attention: **Mr Elzevir W. Gelderbloem** Pr. Eng. (Namport) <[@namport.com.na](mailto:info@namport.com.na)>

Dear Sir

### **Namport - Urgent request for specific items**

We act herein on behalf of NTLA, OTA, FA, Forensis (referred to as “our clients” hereinafter).

We have been instructed to respond to your reply of 14 February 2024 to a letter addressed on 13 February 2024. While our clients understand that you are in the process of conducting environmental and heritage studies, our clients remain extremely concerned that the existing and new research on Shark Island, along with the likely impact this expansion will have on the cultural and environmental character of Shark Island have largely not been acknowledged. We also wanted to bring to your attention that our clients have still not received any of the requested documents from their correspondence dated 13 February 2024 letter.

We are instructed to reiterate the principle demands of NTLA, OTA, FA, and Forensis:

### **An immediate and permanent moratorium on all construction whether on top of or in direct vicinity of Shark Island.**

Furthermore, we are also instructed to request on an urgent basis, which we hereby do, the following from Namport:

- a. The Archaeological / Heritage study which Andre Faul from Geo Pollution Technologies said was to be completed by February 2024.
- b. Confirmation that the NTLA and OTA are included in all forthcoming decision-making processes, not just as an interested/affected party for the impact assessments but as decision making parties with full transparency to all plans and discussions on the planned port expansion.
- c. All and any environmental impact assessments conducted to date and in the future.
- d. All up to date construction plans and drawings.

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#### Trustees of the Legal Assistance Trust:

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| Tangeni Amupadhi              | Toni Hancox (ex officio) | Gladice Pickering |

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Toni Hancox (Director)

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- e. Minutes from all previous community consultation meetings.
- f. The development of an alternative plan for the Phase 2 expansion of the Lüderitz Port, as required under the Environmental Management Act and informed by the outcomes of the environmental impact assessment, to be shared with the above parties.
- g. All previously published documents shared publicly and with the registered interested and affected parties.
- h. A response to the [statement shared in this article](#), claiming that the Luderitz Port expansion is envisaged as a temporary measure **before** the larger new port facility at Angra Point is completed, rendering this expansion unnecessary.

Furthermore, the history of Shark Island is well known, and documentation published [in this report, available since 12 April](#), affirms and reinforces what the affected communities and descendants of the genocide victims and survivors have informed us about the atrocities that were carried out at Shark Island. We note that you attended the event in April organised by NTLA, which summarised these findings and addressed the importance of preserving this site.

From a cultural heritage perspective alone, no further study needs to be conducted to conclude that construction immediately adjacent to the island followed by the operation of heavy machinery and toxic materials there would be unacceptable for any cultural heritage site and for the communities which claim it. As we mentioned in our clients previous letter, also includes the disturbance and desecration of underwater human remains adjacent to the island.

Kindly respond to our correspondence urgently and include a detailed address to this demand for a moratorium on construction as well as to our clients requests for the above items within 7 days of date hereof.

It is our wish and intention to resolve this matter amicably however, should we not receive a comprehensive and affirmative response to our demand and requested items we will refer this matter to the Office of the Ombudsman for further investigation.

We sincerely hope that this will not necessary.

Best regards,

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|                               |                          |                   |
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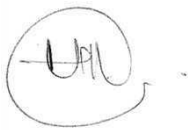


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Corinna van Wyk  
Project Coordinator (Land, Environment and Development (LEAD)  
Legal Practitioner  
Legal Action Center

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