

ARCHAEOLOGICAL AND HERITAGE IMPACT ASSESSMENT REPORT

**FOR THE PROPOSED BASE & RARE METALS, INDUSTRIAL MINERALS,
DIMENSION STONE, SEMI PRECIOUS STONES & PRECIOUS METALS
EXPLORATION ACTIVITIES ON EXCLUSIVE EXPLORATION LICENCE No.10024
LOCATED SOUTH WEST OF KAMANJAB, KUNENE REGION, NAMIBIA**

Compiled by:

NKOSANA HLABANGANA



Prepared for:

FSN Mining (Pty)Ltd (The Proponent)

As required under Section 53 (7) and Section 54 (7) of the National Heritage Act (No. 27 of 2004).

Document Information/Project Details

Item	Description
Report Title	Archaeological and Heritage Impact Assessment Report For The Proposed Base & Rare Metals, Dimension Stone, Industrial Minerals, Semi Precious Stones & Precious Metals Exploration Activities On Exclusive Exploration License No.10024 located South West Of Kamanjab Kunene Region, Namibia.
Target Commodities	Base and Rare Metals, Dimension Stone, Semi Precious Stones, Precious Metals and Industrial Minerals
Purpose of the assessment	The purpose of study is to identify, record and recommend measures for mitigation in areas of the archaeological and cultural heritage significance, this include rock art sites, artefacts, graves or burial grounds features, paleontological, structures, buildings, landscape etc. that might be impacted by the proposed exploration activities.
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Size of the application areas	48644.5086 hectares (Ha)
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Report Date	28/10/2025

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I, **NKOSANA HLABANGANA** as an Independent Archaeologist declare that,

- As a professional archaeologist, I have the expertise of undertaking an AHIA using both methods of research desktop survey and field survey in correlation to the Namibian National Heritage act of (27 of 2004) adhering to the regulations and guidelines.
- This work has no compromise and has been done ethically.
- I have expertise in conducting heritage impact assessments, including knowledge of the Act, Regulations, and any guidelines that have relevance to the proposed activity.
- I will perform the work relating to the application objectively, even if the results in view and findings are not favourable to the applicant.
- I have no interest in the project financially, but only to be remunerated for the work done.
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Date:

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Table 1: Glossary list used in this report

Abbreviation	Description
AHIA	Archaeological and Heritage Impact Assessment
AMP	Archaeological Management Plan
AD	Anno Domini
ASAPA	Association of Southern African Professional Archaeologists
CFP	Chance Find Procedure
EAPAN	Environmental Assessment Professionals Association of Namibia
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment*
EIA	Early Iron Age*
EMP	Environmental Management Plan
ESA	Early Stone Age
GIS	Geographical Information System
NHC	National Heritage Council
MAN	Museum Association of Namibia
MIA	Middle Iron Age
MSA	Middle Stone Age
LIA	Late Iron Age
LSA	Late Stone Age
PM	Project Manager
SM/I	Site Manager/Inspector
SAfA	Society of Africanist Archaeologists
SAMA	South African Museums Association

Table 2: Definitions of Key Concepts and Terms

Archaeological	In relation to a place or an object, means (a) any remains of human habitation or occupation that are 50 or more years old found on or beneath the surface of the land or in the sea; (b) rock art, being any form of painting, engraving or other representation on a fixed rock surface or loose rock or stone which is 50 or more years old;
Archaeological Site	This means an area in which archaeological objects are situated. Archaeological remains can be defined as any features or objects resulting from human activities, which have been deposited on or in the ground reflecting past ways of life and are either 50 years old or older than that.
An artefact or artefact	A general term for an item made or given shape by human culture, such as a tool or a work of art, especially an object of archaeological interest
Isolated finds	Occurrences of artefacts or other remains that are not <i>in situ</i> or are located apart from archaeological sites. Although these are noted and recorded but do not usually constitute the core of an impact assessment unless they have intrinsic cultural significance and value
In-situ	Refers to material culture and surrounding deposits in their original location and context, for example, an archaeological site that has not been disturbed by farming.
Built environment	The built environment includes an array of historic buildings, structures and objects, from missions, forts and rock walls to entire town sites and settlements.
Monuments	Architectural works, works of monumental sculpture and paintings, elements or structures of an archaeological nature, inscriptions, cave

	dwelling and combinations of features, which are of outstanding universal value from the point of view of history, art or science;
Heritage significance	Means aesthetic, archaeological, architectural, cultural, historical, scientific or social significance;
A grave:	A place of interment (variably referred to as burial) includes the contents, headstone or other markers of such a place, and any other structure on or associated with such place. A grave may occur in isolation or in association with others where it is referred to as being situated in a cemetery (contemporary) or burial ground (historic).
Historic building	Refers to structure or building which is over 50 years or more.
Chance Finds	This means archaeological artefacts, features, structures or historical cultural remains such as human burials that are found accidentally in the context previously not identified during cultural heritage scoping, screening and assessment studies. Such finds are usually found during earth-moving activities.
Study area or 'proposed project area'	Refers to the area where the Proponent/developer wants to focus its development activities.
Periodization	Archaeologists divide the different cultural epochs according to the dominant material finds for the different periods. This periodization is usually region-specific, such that the same label can have different dates for different areas. This makes it important to clarify and declare the periodization of the area one is studying. These periods are nothing a little more than convenient time brackets because their terminal and commencement are not absolute and there are several instances of overlap.
ESA	>2 600 000 years ago – 250 000/200 000 years ago
MSA	250 000/200 000 years ago – 40/25 000 years ago
LSA	25 000 years ago – AD 200 (up to historic times in certain areas)
Iron Age Period	AD 200 – AD 1840

Historic Period	AD 1840 – 1950

1. Introduction

1.1. Background and General Heritage Context Of The Area

Archaeologist (Nkosana Hlabangana) was appointed by FSN Mining (Pty)Ltd (The Proponent) to conduct a Heritage Impact Assessment for the proposed exploration activities on EPL10024 located ,South West Of Kamanjab, Namibia. The National Heritage Act (No. 27 of 2004) which is an Act of Parliament, mandated "to provide for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Any planned developments, such as construction, road expansion, exploration, or mining near Kamanjab, must undergo a Heritage Impact Assessment (HIA) and obtain consent from the National Heritage Council of Namibia (NHC). This Archaeological and Heritage Impact study seeks to identify archaeological, cultural; historical and heritage issues associated with the proposed prospecting and exploration activities on Exclusive Prospecting License (EPL) 10024. The issues identified during site visits, fieldwork, and public participation are presented in this Archaeological Heritage Report and evaluated in terms of their significance at the local, regional, and national levels.

These issues are further analyzed through an established assessment process outlined in the report, which aims to determine the cumulative impacts of the proposed project on non-renewable archaeological and heritage resources. The report also provides appropriate recommendations and mitigation measures to ensure the proper and responsible management of cultural and heritage resources. The key finding of the Heritage Assessment is that while the identified receptors of tangible and intangible cultural heritage are considered sensitive, under normal operations and if the affected communities accept the recommended mitigation efforts, the impacts will be low. It is strongly advised that FSN Mining (Pty)Ltd (The Proponent) undertake a rigorous communication and participation campaign prior to and during the operations period, to ensure (even if difficult), full community participation, as well as stakeholder engagement to provide information to communities so that people understand the operations process and can provide inputs.

Archaeologically, the region is rich in heritage sites, Twyfelfontein is among them, and this is Namibia's first UNESCO World Heritage Site, which features over 2,500 ancient rock engravings created by San people between 2500 and 2000 years ago. These engravings depict various animals, including giraffes, lions, and even sea creatures, suggesting that the San people may have traveled as far as the Namibian coast. Close to Twyfelfontein are the Organ Pipes, a natural basalt formation estimated to be 120 million years old, believed to have been used as cutting tools by early inhabitants. Adjacent to this is the Burnt Mountain, a geologically sensitive site formed when volcanic lava baked limestone deposits approximately 200 million years ago, resulting in its distinctive coloration. The region also features the Living Museum of the Damara, established in 2010 to preserve and showcase traditional San and Damara culture through activities such as fire-making, masonry, and traditional dance. Another significant site is the Petrified Forest, located west of Khorixas, where fossilized tree trunks some measuring up to 45 meters were deposited by ancient floods around 200,000 years ago. These sites collectively highlight the rich historical and cultural landscape of the Kunene Region (Smit, 2012).

Since the EPL 10024 area is located just 7.136km from Kamanjab, it is important to provide a brief history of the town. The name Kamanjab is derived from the Otjiherero word "okamanja," which means a place of big stones. Evidence of early human habitation in the area is found in the form of rock engravings located on Farm Kamanjab at Peet Alberts Koppie where approximately 1,200 to 1,500 rock engravings have been documented. These include animal figures and abstract designs, making the site one of Namibia's richest in terms of both quantity and quality of engravings. Among the most notable is a giraffe engraving measuring 330 cm, recognized as the largest of its kind in the country. The presence of overlapping designs suggests that the site was used over an extended period.

The site is named after Peet Alberts, a Dorsland Trekker who settled in Namibia, (Safari2Go, n.d.). In addition to its archaeological significance, the area is home to Himba villages, where one can find spiritual places that hold deep cultural importance to the local people. The Himba are known for their strong spiritual beliefs and traditional way of life.

The EPL 10005 is located 7,136 Km southwest of Kamanjab in the Kunene region and covers a total surface area of 48644.5086 hectares (Ha). The EPL covers (overlies) farms Gauss, Vryheid,

Kakatswa Onguati No. 236, Amkarub, Blydskap, Vergelee No. 266,Katemba Autsaub, Bergvallei,Welvaart,Farm 242, Autsuab and //Khoadi//Hoas Conservancy. Shown in **Fig 2** below

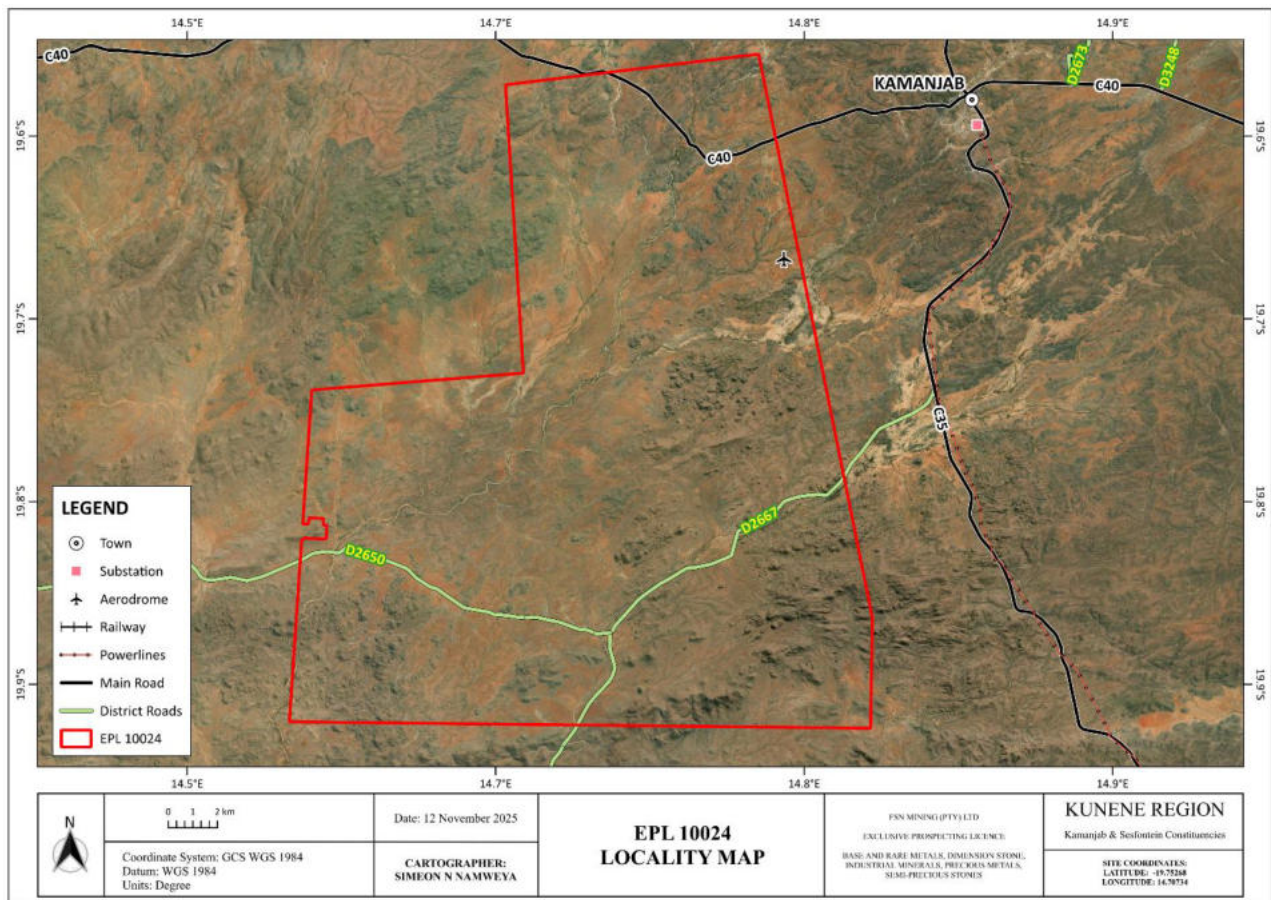


Figure 1: Locality map of the area of interest.

Accessibility and EPL Coverage

The proposed project is in the Kunene region, located South West 7.479 km away from Kamanjab Village Settlement,and covers a total surface area of 48644.5086 hectares (Ha). The EPL covers (overlies) farms Gauss, Vryheid, Kakatswa Onguati No. 236, Amkarub, Blydskap, Vergelee No. 266,Katemba Autsaub, Bergvallei,Welvaart,Farm 242, Autsuab and //Khoadi//Hoas Conservancy. The site accessibility map of the proposed project is shown in **Figure 2** below. The EPL area is

strategically located within a sparsely populated, semi-arid landscape that is part of Namibia's northwestern geological terrane.

Well-established regional road networks facilitate accessibility to the EPL:

- From the West and South: Access is possible via the D2650 gravel road originating from Anker, a critical transport route that links rural communities to service centres.
- From the North: The C40 tarred road, connecting Kamanjab to Palmwag, provides a primary access route to the northern boundary of the EPL.

These road connections offer significant logistical advantages, enabling the efficient movement of personnel, equipment, and exploration materials to and from the site.

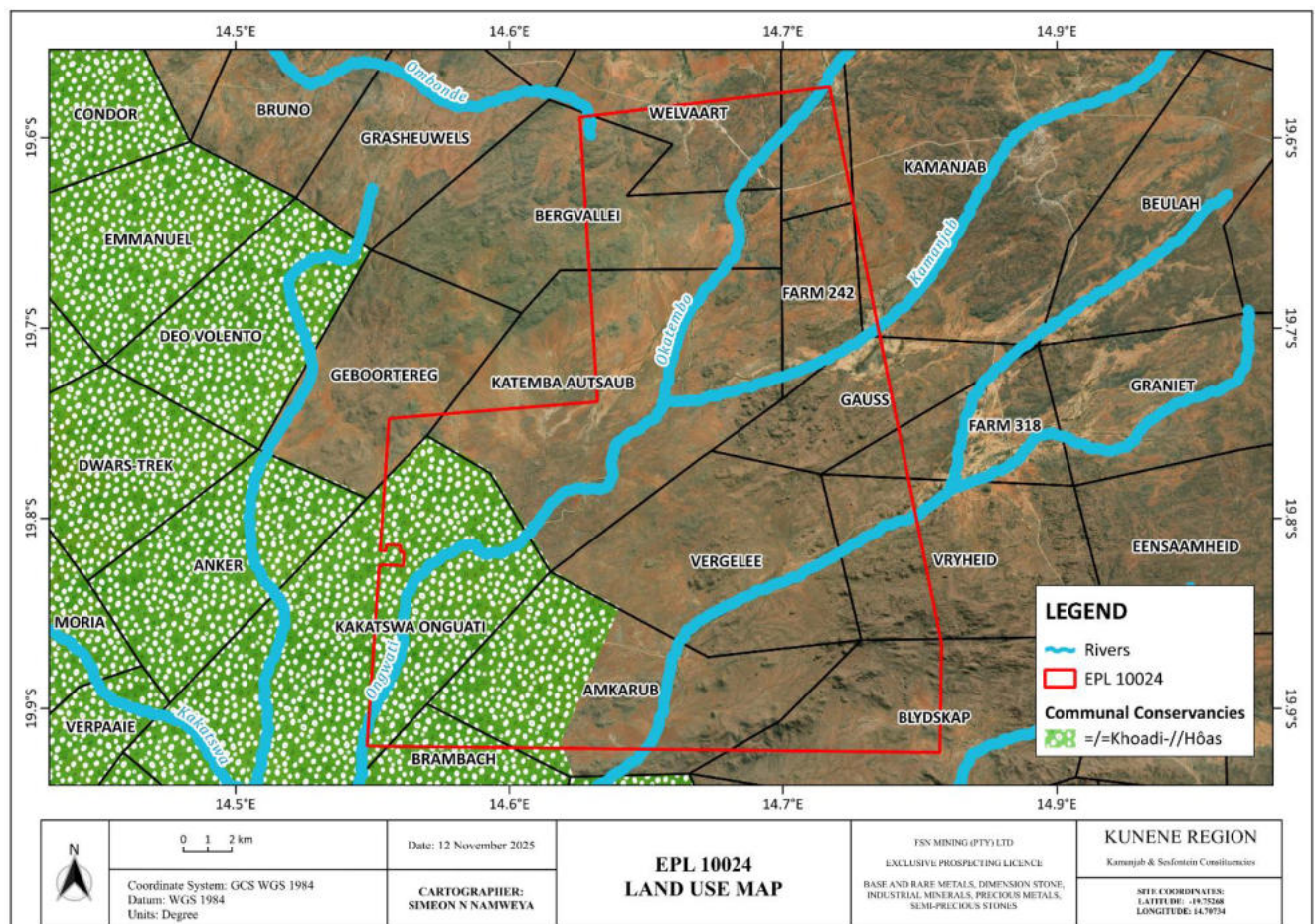


Figure 2: Land use map of the EPL coverage.

The approximate coordinates of the area are provided below in the form of a topographical map with corner boundaries as well as the centre coordinates (**figure 3**).

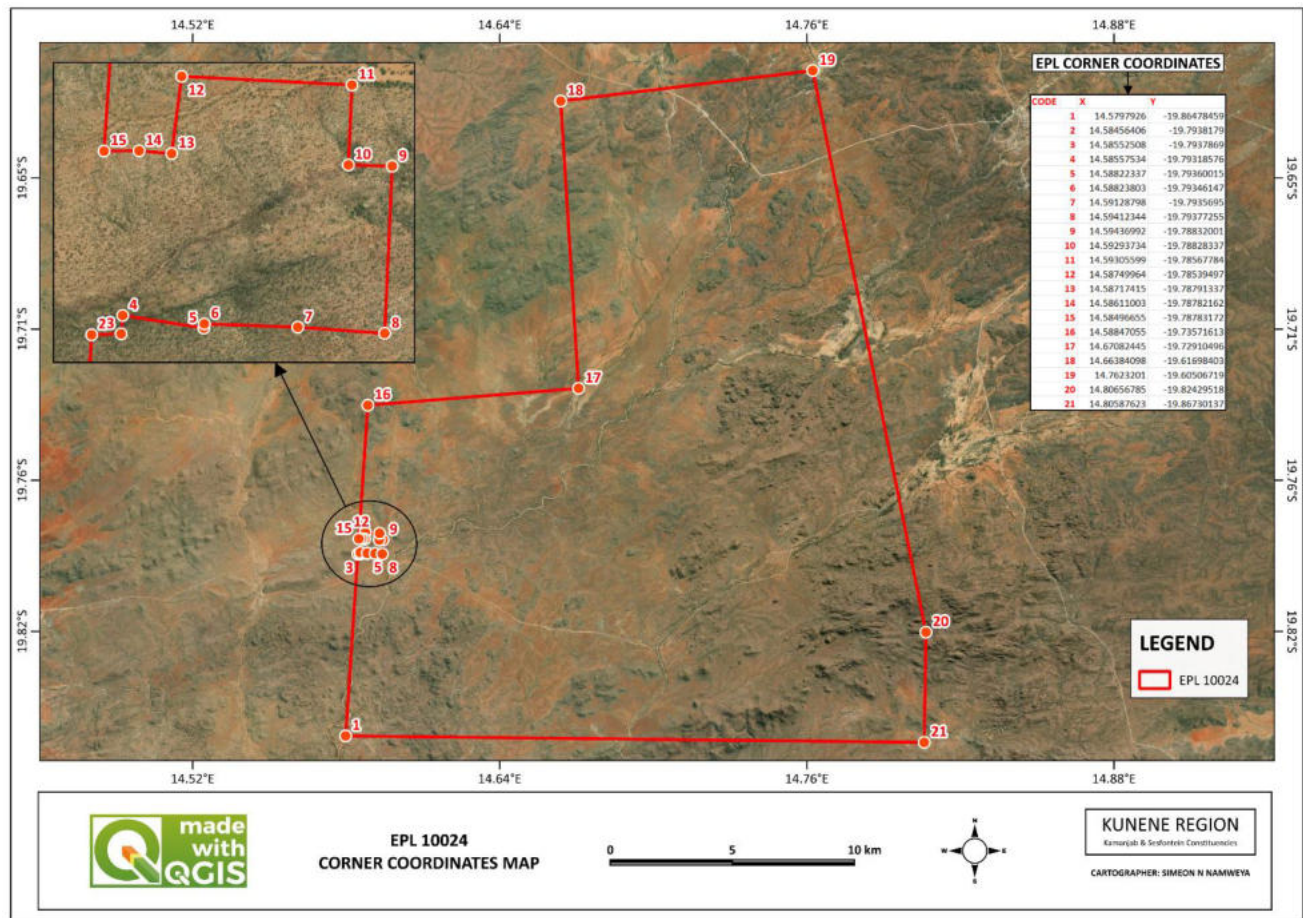


Figure 3: Approximate GPS coordinates Corners/boundaries of the Proposed Project Site

Therefore, the principal aim of the study is to survey the area of study, identify archaeological, cultural and heritage sites, document them, and assess their importance within a local, regional and national context. It serves to assess the impact of the proposed project on non-renewable heritage resources and to submit appropriate recommendations about the responsible cultural responsibly managing the discovered heritage resources. It is also conducted to protect, preserve, and develop such resources within the framework provided by the National Heritage Act of 2004 (Act No. 27 of 2004). This report outlines the approach and methodology used before and during the survey, which includes Phase 1, a review of relevant literature; Phase 2, consultation and the physical surveying of the area on foot and by vehicle; Phase 3, reporting the outcome of the study.

In accordance with the existing Namibian relevant Acts, this report has therefore been compiled to complement the Environmental Scoping Assessment (ESA) Report and to be submitted to the National Heritage Council of Namibia as a requirement and condition of the issuance of a Consent Letter. The Consent Letter will need to be submitted to the Environmental Commissioner to make an informed decision on the issuance of the Environmental Clearance Certificate (ECC) for the proposed project.

1.2. Terms of Reference

Mr. N. Hlabangana (Archaeologist) was contracted by FSN Mining (Pty)Ltd (Proponent), to undertake Archaeological & Heritage Impact Assessment (AHIA) for the proposed base and rare metals, dimension stones, semi-precious, precious metals and industrial minerals. The primary task of the archaeological assessment reported here was to identify sensitive archaeological sites or anything of cultural material that could be affected by project activities. The archaeological assessment addresses the following primary elements:

- (a) Locate, identify, record, photograph and describe sites of archaeological, historical or cultural interest,
- (b) Record coordinate points (GPS) of identified areas as significant,
- (c) Determine the levels of significance of the various types of heritage resources that might be affected by the proposed project, and
- (d) Suggest appropriate management and mitigation measures for the archaeological and cultural heritage resources that might occur in the area proposed for exploration and mining works, which can be potentially destroyed in the course of exploration activities.

2. Legislative context

This chapter outlines the regulatory framework applicable to the proposed project. This HIA report is a component of a broader Environmental & Social Impact Assessment (ESIA) study and addresses the requirements of the NHA Act 27 of 2004 and National Heritage Regulations (Government Notice 106 of 2005, in line with the Environmental Management Act, 2007 (EMA), and with reference to the assessment of impacts of the proposed exploration and mining activities on the archaeological, cultural and heritage resources associated with the receiving environment.

In principle, the National Heritage Act, 2004 (Act No. 27 of 2004) provides for the protection and conservation of places and objects of heritage significance and the registration of such places and objects. Special provision is given for protection and management of certain heritage resources in Namibia, these are listed in **Part VI from paragraph (53-58)** including listed buildings which are 50 years old or more than that, archaeological object or paleontological interest in existence which is 50 years or more years old, meteorite, historic shipwrecks and shipwreck objects (Underwater heritage) this include the remains of all ships that have been situated on the coast or in the territorial waters or the contiguous zone of Namibia for 35 years or more are historic shipwrecks for the purposes of this section.; and other heritage resources.

Part I, Section1 paragraph (a) and (b) defines "archaeological" in relation to a place or an object, means (a) any remains of human habitation or occupation that are 50 or more years old found on or beneath the surface on land or in the sea; and (b) rock art, being any form of painting, engraving or other representation on a fixed rock surface or loose rock or stone which is 50 or more years old. While **Part V Section 46** of the Act prohibits removal, damage, alteration, or excavation of heritage Sites or remains. **Section 48** sets out the procedure for application and granting of permits as may be required in the event of damage to a protected site occurring as an inevitable result of development.

Furthermore, **Section 51 (3)** sets out the requirements for impact assessment. **Part VI Section 55 Paragraphs (3) and (4)** require that any person who discovers an archaeological site should immediately notify the National Heritage Council.

Table 3: Summary of the relevant Act(s) and Ordinance

National Regulatory	Summary	Applicability to the Project
National Heritage Act, No. 27 of 2004.	<p>The Act makes provision for the protection and conservation of places and objects with heritage significance</p> <p>Section 55 compels exploration companies to report any archaeological findings to the National Heritage Council after which a permit needs to be issued before the find can be disturbed.</p>	<p>There is potential for heritage objects to be found during the clearance of land and operations, therefore the Stipulations in the Act have been taken into consideration and are incorporated into this A/HIA report and the overall project EMP.</p> <p>The project shall be compliant with section 55. And adhere to the recommended measures made in the report.</p>
National Monuments Act of Namibia (No. 28 of 1969) as amended until 1979	<p>No person shall destroy, damage, excavate, alter, remove</p> <p>from its original site or export from Namibia: Meteorites, fossils, petroglyphs, ornamental infrastructure graves, caves, rock shelters, middens, shells that came into existence before the year 1900 AD: or any other archaeological or paleontological finds.</p>	N/A

<p>Burial Place Ordinance, Act No. 27 of 1966.</p>	<p>To prohibit the desecration or disturbance of graves in burial places and to regulate matters relating to the removal or disposal of dead bodies.</p> <p>Municipal Ordinance 13 of 1963 has been replaced by the Local Authorities Act 23 of 1992.</p> <p>(3) No person shall, except with the permission of the Administrator, in any way disturb, damage, remove or destroy a grave, monument, gravestone, cross, inscription, rail, enclosure, chain or erection of any kind whatever, or part thereof in any burial place.</p>	<p>Graves and burial grounds are of cultural heritage significance, and they are rated high in cultural-social context. There is a possibility of uncovering sub-surface graves during exploration activities hence the adoption of Chance Find is highly recommended.</p>
<p>Environmental Management Act (7 of 2007) Government Notice 232 27th December 2007</p>	<p>PART I: The definition of the environment employed by the Environmental Management Act (7 of 2007) specifically includes “anthropogenic factors” such as archaeological remains or any other evidence of human activity.</p>	<p>Archaeological materials, heritage resources, historical, cultural landscapes or topographical settings are part of the environment in its context, hence this Act is very relevant to the proposed development and the Proponent is henceforth mandated to take into consideration all the necessary</p>

	<p>PART II: Environmental impact assessment (EIA) in Namibia is governed by this legislation and usually includes a specialist archaeological survey and assessment, following the stated Principles of Environmental Management requires that Namibia's cultural...heritage...must be protected and respected for the benefit of present and future generations.</p>	<p>steps so as not to affect or destroy the environment where heritage resources are found.</p>
Environmental Assessment Policy of Namibia 1995	<p>The policy seeks to ensure that environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and the term environment is broadly interpreted to include biophysical, political, economic, social aspects, traditional norms, cultural and historical components.</p>	<p>This Archaeological and Heritage Assessment study considers the term environment to be part and parcel of archaeological and cultural heritage in its contexts.</p>

3. Scope of the Study and Objective of the Report

This Archaeological & Heritage Impact Assessment (AHIA) aims at identifying any significant heritage resources in such a way as to allow the development to proceed without undue impacts to the heritage resources of a particular area. In addition, this report aims to fulfil the requirements of the Heritage Authorities of Namibia who will review the AHIA and grant or refuse authorization. Similarly, the report will inform the EIA in the development of a comprehensive ESMP to assist the project Proponent in responsibly managing the identified heritage resources in order to conserve and preserve them within the framework provided by the National Heritage Council Act (Act No 27 of 2004). Hence, this AHIA report will outline any management and mitigation requirements that needs to be complied with from a heritage point of view and that should be included in the conditions of authorization should this be granted.

4. Assumptions, Limitations and knowledge gaps

The HIA report herein was carried out at the surface levels only and hence any completely buried archaeological sites could not be readily located. Similarly, it is not always possible to determine the depth of archaeological material visible at the surface. Based on this assumption, the possibility of discovery or unearthed of heritage resources during the clearing of vegetation, trenching and / or drilling phases cannot be excluded. However, this limitation can be successfully mitigated with the implementation of a chance find procedure as recommended in the report. As with mitigation measures recommended in this report, (**SECTION 4.2 below for Chance Finds Procedure (CFP) in accordance with the National Heritage Council**) are outlined by the National Heritage Council. In addition to that, the Author of this report has prepared an Archaeological Heritage Mitigation Plan.

5. Approach and Methodology

5.1. Literature Review

A brief survey of available literatures was conducted to extract data and information on the area in question to provide general heritage context into which the exploration and mining would be set. The review referred to reputable publications, unpublished reports including EIA reports and online material from various websites. A survey of available literatures was carried out to assess the archaeological and heritage context into which the proposed project would be set. Maps of the area were used to identify the geologic, topographic, landscape and elevation of the proposed project area. Archaeological, historical and heritage sites are identified using Garmin GPS and photographs taken during the surface survey.

5.2. GIS Spatial analysis

Google Earth and topographic maps of the area were utilized to identify geologic, topographic, elevation of the area, and possible places where sites of heritage significance might be located. The GIS spatial database was utilized to collect any useful information on any the above mentioned in the area, while a GPS unit was used for geo-referencing purposes during the field survey.

5.3. Site Investigation

The objective of the site visit was threefold:

- (a) to conduct a comprehensive survey of the proposed project area in order to locate, identify, document, photograph, and describe any sites of archaeological, historical, or cultural significance, should any be present;
- (b) to accurately record the geographic coordinates (GPS points) of all identified sites or areas deemed to be of significance;
- (c) to assess the levels of significance and assign appropriate grading to the various categories of heritage resources encountered within the project area. The prevailing conditions observed during the field survey of the proposed project area are in **Figure 4 below**.



Figure 4: An overview of the environmental setting within EPL 10024

6. Site Significance Rating:

The presence and distribution of historical, cultural or heritage resources define a ‘heritage or cultural landscape’ of an area. In this landscape, every site is relevant, and because heritage resources are non-renewable, heritage surveys are needed to investigate the proposed project area or a representative sample, depending on the nature of the project. In the case of the proposed project, the local extent of its impact necessitates a representative sample and only the footprint of the areas demarcated for development was surveyed. In all the initial investigations and surface surveys, however, Nkosana Hlabangana (Archaeologist) is responsible only for the identification of resources visible on the surface. The grading and level of significance of the identified heritage resources in interest are given in the following pages in *Table 6*.

Table 4: Grading of Heritage Significance and Field Rating

Level of significance	Grading	Description
Exceptional/upper higher	5	<ul style="list-style-type: none">• Major national heritage resources• A rare and outstanding example• Containing unique evidence of the high regional and national significance
Considerably high	4	<ul style="list-style-type: none">• Very important to the heritage of the region• A high degree of integrity/authenticity• Multi-component site and objects• High research potential
Moderate	3	<ul style="list-style-type: none">• Contributes to the heritage of the locality and region• Have some altered or modified elements, not necessarily detracting from the overall significance of the place• Forming part of an identifiable local distribution or group• Research potential
Low	2	<ul style="list-style-type: none">• Isolated minors found in undisturbed primary context, with diagnostic materials

		<ul style="list-style-type: none"> • Makes some contribution to the heritage of the locality, usually in combination with similar places or objects
Little	1	<ul style="list-style-type: none"> • Makes little contribution to the heritage resources of the locality • Heritage resources in a disturbed or secondary context, without diagnostic or associated heritage
Zero/ no significance	0	<ul style="list-style-type: none"> • Absence of heritage resources • Highly disturbed or secondary context, without diagnostic or associated heritage

Impact Assessment Methodology as developed by QRS Namibia

This Archaeological and Heritage Impact Assessment followed a two-based process of assessment; desktop and field-based assessments. The criteria below are used to establish the impact rating on sites based on the findings. These are recognized by the International Council of Monuments and Sites (ICOMOS), as well as those formulated by the Quaternary Research Services (QRS) in Namibia by Kinahan (2012). The methodologies were adopted in line with the standards for environmental assessment and the protocol developed for archaeological heritage assessment in Namibia that reflect Namibian conditions and are accepted as a basis of evaluation by the National Heritage Council. To establish the heritage significance of the resources, and their vulnerability to possible disturbance during development activities, the assessment criteria below developed by QRS (Kinahan, 2012) established parallel 0-5 scales, as summarized in (*Tables 7-9*) below.

Table 5: Archaeological Significance and Vulnerability Rankings (Kinahan, 2012)

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

Table 6: Assessment criteria for the evaluation of cumulative impacts on archaeological sites devised by the QRN.

Criteria	Category	Description
The extent or spatial influence of impact	National	Within Namibia
	Regional	Within the Region
	Local	On-site or within 200 m of the impact site impact

Criteria	Category	Description
The magnitude of impact (at the indicated spatial scale)	High	Social and/or natural functions and/ or processes are severely altered
	Medium	
	Low	Social and/or natural functions and/ or processes are notably altered
	Very Low	Social and/or natural functions and/ or processes are slightly altered
	Zero	Social and/or natural functions and/ or processes are negligibly altered
Duration of impact	Short Term	Up to 3 years
	Medium Term	4 to 10 years after construction
	Long Term	More than 10 years after construction

Table 7: Reversibility Rating Criteria

Reversibility Ratings	Criteria
Irreversible	The activity will lead to a permanent impact.
Reversible	The impact is reversible, within 10 years

6.1. Results of Public Consultation and Stakeholder Engagement

On 28 October 2025, a door-to-door consultation was undertaken as part of the Heritage Impact Assessment (HIA) for Exploration Licence EPL10024. The purpose of the consultation was to engage with landowners, the //Khoadi //Hoas Conservancy, and local community members to provide information on the proposed exploration activities, outline potential impacts on cultural and historical heritage resources, and obtain feedback to inform the assessment and management measures.

During the visits, the project team presented details on the scope of the proposed works, preliminary heritage findings, and proposed mitigation strategies. Participants were encouraged to express their concerns, share local knowledge of heritage sites, and suggest appropriate measures to minimize potential impacts. All feedback obtained during the door-to-door engagement was documented and incorporated into the final Heritage Impact Assessment report for EPL10024.

The /Gaio-Daman Traditional Authority expressed strong objections to any disturbance or destruction of material cultural heritage within their land, including graves, rock art, ruins, and other significant features, emphasizing that such locations are considered “no-go zones. “Similarly, Mr. Roberts, the owner of Vryheid Farm, identified his family graves on the property and stressed that, while he supports development initiatives, the family burial site must remain undisturbed and is regarded as a no-go zone.

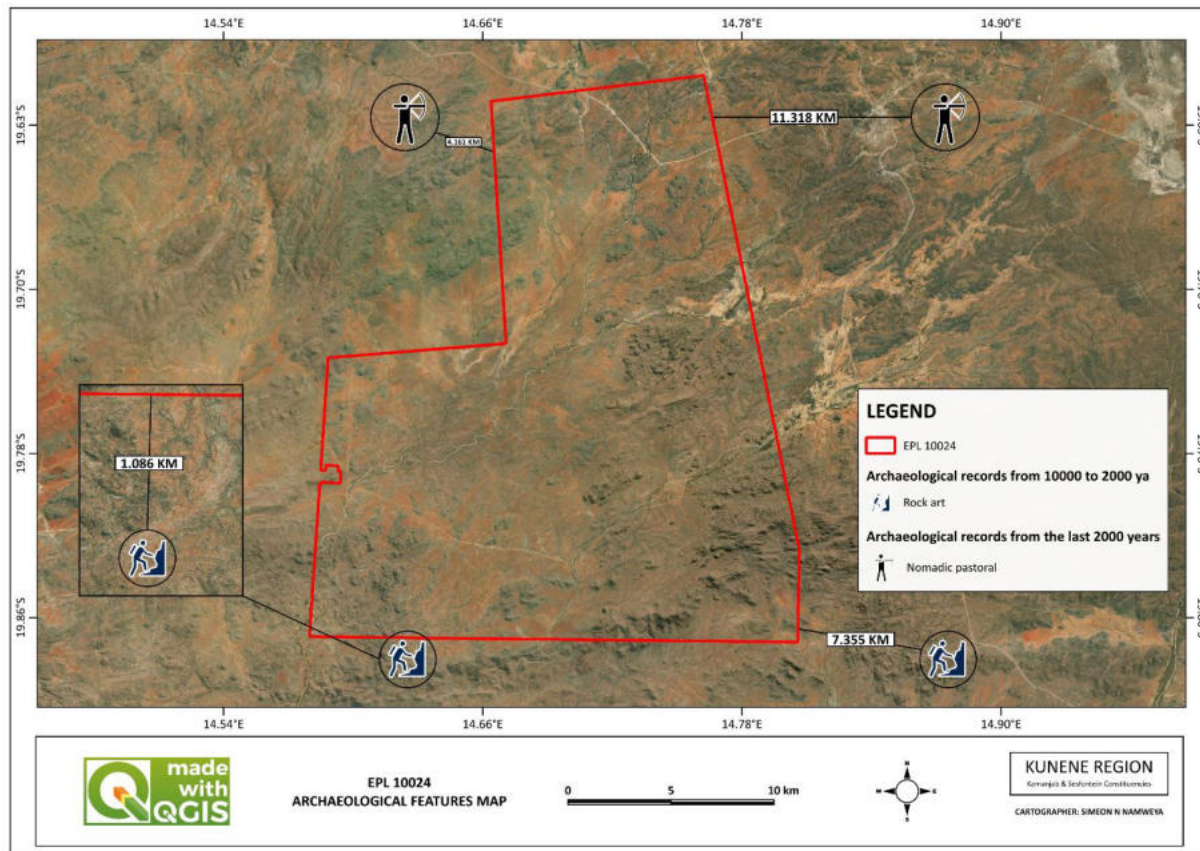


Figure 5: The Archaeological Features Map within the landscape of which the EPL is situated.

6.2. The General Archaeological Environment Sequences of Southern Africa.

The Southern African archaeological environment is divided into the Stone Age, the Iron Age and the Historical Period. **Table 11** below summarizes different periods in relation to technological advancement and cognitive evolution.

Table 8: The Archaeological Context: Sequence, Period and Definitions

Period	Approximate Dates
Early Stone Age	> 2 600 000 years ago – 250 000/200 000 years ago
Middle Stone Age	250 000/200 000 years ago – 40/25 000 years ago
Later Stone Age	25 000 years ago – AD 200 (up to historic times in certain areas)
Early Iron Age	AD 200 – AD 900/1000
Middle Iron Age	AD 900/1000 – AD 1300
Late Iron Age	AD 1300 – AD 1850

Source: (Sampson, 1974).

6.3. Archaeological Sequence in Namibia

To put Namibian heritage and archaeological contexts into perspective, the following information is crucial to the general understanding of the occurrence and the associated period in different timeframes, that would represent the known human occupation sequence in Namibia and Southern Africa in general. This helps in building knowledge about past adaptations and cultural dynamics. According to Nankela (2017), the archaeological sequences of Namibia can be summarized as follow (**Table 12**).

Table 9: Archaeological Sequences in Namibia

Period	Year	Area/Location	Evidence	Description
Pleistocene	400 000- 100 000	Namib Plains, Namib Desert & Lower Kuisieb	Bone fragments of extinct elephants and stone tools	
Holocene	10 000 - 1 000	Around Namibia	Scattered artefacts, rock art sites, potsherds, beads, grave cairns, hut circles, human remains, axes, pointed flakes, cleavers and blades.	Sites are fragile, inaccessible and due to inadequate archaeological investigations in some sites.
Historic Period	500	Around Namibia	Cemeteries, old mine workings, waste rock walling, architectural heritage and WWI military engagements.	Namibia indicates intensive settlements between indigenous people and Europeans.

7. Physical and Environmental Context of the Area

7.1.1. Site Description and Environmental Setting of the Proposed Development

The vegetation: The proposed project site falls within the Kunene region. The vegetation in the western highlands of the Kunene region is shaped by factors such as topography, climate, soil

types, and water availability. The western highlands are characterized by rugged mountains, rocky outcrops, and hilly terrain. Vegetation in these areas often includes hardy and drought-resistant plant species adapted to rocky and steep slopes.

The Kunene vegetation is categorized as Mopane savanna, which also extends into the Omusati, Oshana and Oshikoto Regions. This type of vegetation is characterised by species such as: Mopane (*Colophospermum mopane*), Herero sesame bush (*Sesamothamnus guerichii*) Corkwoods (*Commiphora* species) Acacia (*Acacia reficiens* and *Acacia erioloba*), *Commiphora* (*Commiphora wildii*) and grass such as Bushman grass (*Stipagrostis* spp.) and Three-awn Grass (*Aristida* spp)

The EPL lies in acacia tree and shrub biome and the vegetation cover is Western highland which is characterized by rugged terrain, relatively higher rainfall compared to the surrounding arid lowlands, and cooler temperatures, creating a unique ecological niche that supports a variety of flora adapted to these conditions (Mendelsohn et al., 2002; Burke, 2004). The vegetation is primarily savanna and woodland, featuring a mix of grasses, shrubs, and trees. Most of the trees are located along the ephemeral drainage lines, common tree species include *Colophospermum mopane* (mopane), *Vachellia erioloba* (Camel Thorn), and *Boscia albitrunca* (Shepherd's Tree). Grass species such as *Stipagrostis* and *Eragrostis* are also prevalent, providing critical grazing resources for wildlife and livestock (Mendelsohn et al., 2002).

See **Figure 6** below



Figure 6: The vegetation and landscape view of EPL.

8. Assessment of the Findings within the Proposed Project Development

8.1. On-site findings

A field survey was undertaken on 28 October 2025, which included door-to-door interviews with local landowners and farm occupants within and adjacent to Exploration Licence EPL10024. The survey aimed to identify and document any archaeological and cultural heritage resources that could potentially be affected by the proposed exploration activities.

The survey commenced at Vryheid Farm, owned by Mr. Roberts, which is the first property encountered when entering EPL10024 via the D2667 road from the C35 tarred road. Here, the Roberts family graves were recorded and georeferenced. Continuing along the same route, a ruin was identified adjacent to the road, within whose vicinity a cluster of suspected war graves dating to the 1950s was observed. Although partially obscured, the archaeologist successfully recorded the coordinates and established a 4 km buffer zone encompassing the Roberts family graves, the suspected war graves, and the ruin to ensure protection of this archaeologically sensitive area. A 4 km buffer zone was established by the archaeologist due to uncertainty regarding the precise

location of the graves, as the area is heavily obscured by vegetation and terrain. The archaeologist also suspects that additional graves may be buried below the surface; hence the extended buffer was applied to ensure full protection of the potentially sensitive area. At Farm Amkarub, an isolated grave believed to belong to a former farm owner was documented. The farm worker confirmed that this is the only known burial site on the property and that no additional features of cultural or archaeological significance are present within the EPL10024 boundary.

Further north, within the //Khoadi //Hoas Conservancy, old war graves were located near a riverbed. Although access was limited due to dense vegetation, the team was able to clear a narrow path to reach the site and record GPS coordinates. Subsequently, the team proceeded to the Kakatsua Onguati Cemetery, where Old Settlers' Graves and Old Nama Graves, suspected to be those of the Schletwein family ancestors, were identified and recorded. All four of these grave sites are situated on communal land administered under the //Khoadi //Hoas Conservancy. The findings are as follows:



Figure 7: Farm Vryheid Graves (coordinates -19.762287-14.801307)



Figure 8: The site consists of the remains of an old structure (ruin), with a vegetation-covered grave feature situated roughly 300 m to the east (opposite) of the ruin (ruin coordinates -19.776618-14.788248) (suspected grave coordinates 19° 46' 48"S 14° 47' 21"E)



Figure 9: Amkarub Old Farm Owner Grave (coordinates -19.828730 – 14.703778)



Figure 10: Old War Graves (coordinates S 19°50'58.0" E 14°38'07.3")



Figure 11: Old Nama Graves: Suspected Schletwein Parents Graves (coordinates -19.801767 – 14.599657)



Figure 12: Kakatsua Onguati Cemetery (coordinates -19.796441-14.602078)



Figure 13: Old Settlers Onguati Graves (coordinates -19.796356 – 14.602070)

Table 14 below lists and briefly describes all the archaeological findings, which are outside the EPL 10024 boundary that were recorded during the site surface walkover. The sites were documented and described as follows:

Table 10: Assessment of Significance and Grading of Archaeological and Heritage Resources on the Proposed Project

LOCATION	DESCRIPTION OF THE FINDINGS	HERITAGE SIGNIFICANCE	GRADE	VULNERABILITY DESCRIPTION
-19.762287-14.801307	Farm Vryheid Family Graves	CONSIDERABLY HIGH	4	4
-19.776618-14.788248	Remains of an old structure (ruin)	CONSIDERABLY HIGH	4	4
19° 46' 48"S 14° 47' 21"E	Suspected grave situated around the ruin vicinity, approximately 300m	CONSIDERABLY HIGH	4	4
-19.828730 – 14.703778	Amkarub Old Farm Owner Grave	CONSIDERABLY HIGH	4	4
S 19°50'58.0" E 14° 38'07.3"	Old war graves	CONSIDERABLY HIGH	4	4
-19.801767 – 14.599657	Old Nama Graves: Suspected Schletwein Parents Graves	CONSIDERABLY HIGH	4	4
-19.796441-14.602078	Kakatsua Onguati Cemetery	CONSIDERABLY HIGH	4	4
-19.796356 – 14.602070	Old Settlers Onguati Graves	CONSIDERABLY HIGH	4	4

GIS Data Spatial Analysis on the findings

The map below represents the findings made during the surface walk-over in the EPL 10024 , it should be noted that all of the cultural heritage findings made are inside the the EPL10024. Cemetery and gravesites: burial grounds and gravesites are accorded the highest social significance. They have both historical and social significance and are considered sacred. Wherever they exist or not, they may not be tampered with or interfered with during any development otherwise the deemed consequence will be **HIGH**.

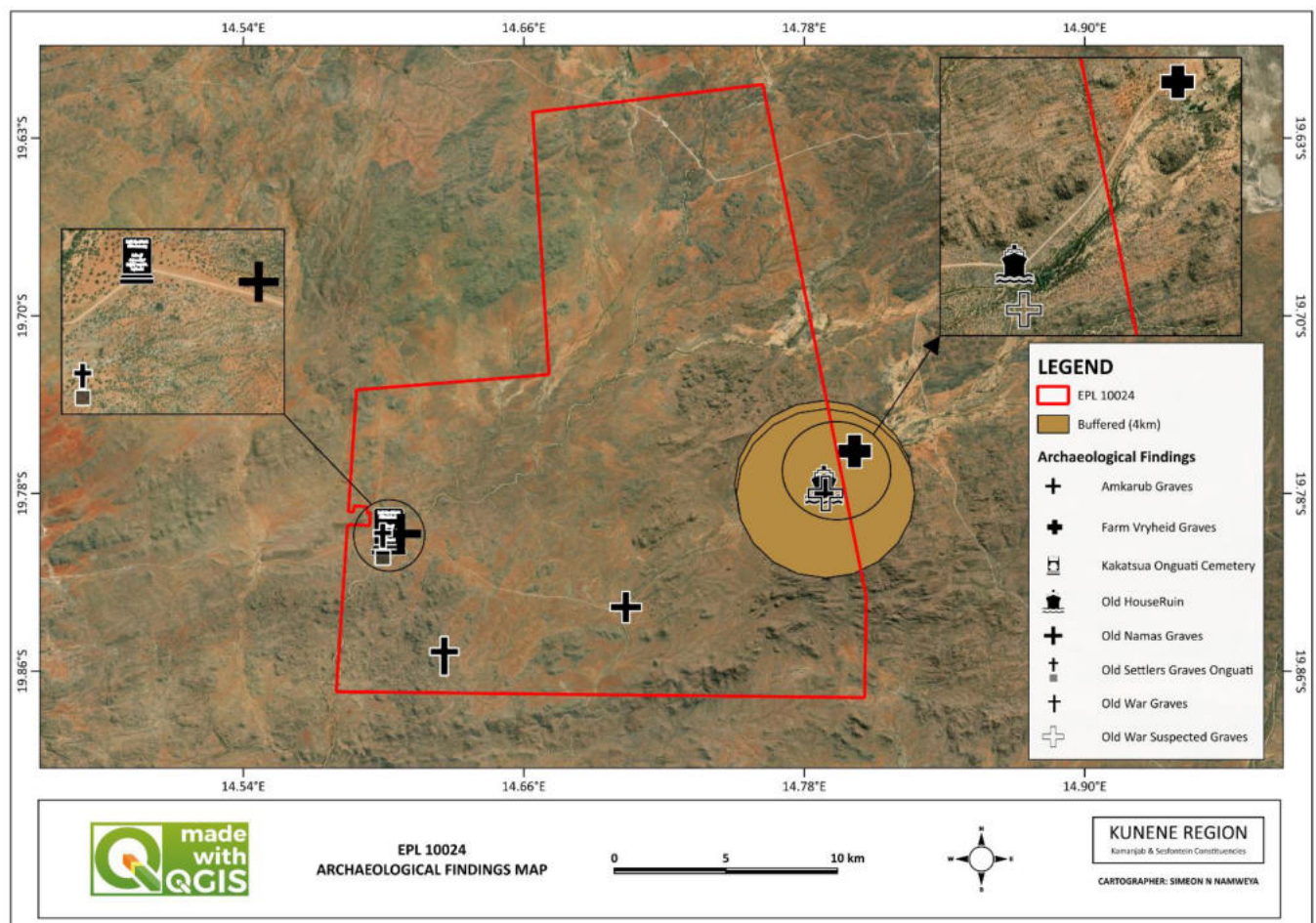


Figure 14: Map of the sites of Archaeological Findings .

9. Potential Impacts on Archaeological, Historical and Cultural Heritage Sites

From an archaeological perspective, the direct impacts on heritage sites can potentially occur during earthworks, which causes vibrations, the sitting of exploration equipment, and the opening up of new access roads. However, knowledge of distance from heritage sites and awareness of the possible existence of heritage resources plus the proposed mitigation measures discusses herein will help in reducing the envisaged impacts to an acceptable level.

Cemetery and graves places are considered cultural heritage and have a high significance rating in the archaeological context. Some of the recorded graves within the farms traversed are of historical significance, as the majority of them occurred and are connected to the period where the Germans had the upper hand over the entire landscape and country at large. The recorded graves are the visible ones, and so, in this context, other unmarked graves for instance the archaeologist buffered 4km from the ruin to the suspected graves area. These graves might be found in the course of exploration works, and thus *Chance Find* Procedure should be adopted for this environment. Also, the Proposed Project exploration team should be effected to try to avoid graves if possible but any that cannot be avoided will require exhumation and possibly reburial for this to happen a necessary permit is required from the National Heritage Council of Namibia. Project Proponent is cautioned that '*Chance Find Procedures*' is mandatory and should be complied with throughout the operational phase of the project.

Summary of the Impacts

Direct impacts or risks of impact on archaeological sites located near the proposed development can be reduced to acceptable levels by the adoption of appropriate recommended mitigation measures including integration of the archaeological heritage record and *Chance Finds procedure* in the project EMP (see *Appendix 1, & recommended mitigations*). Special efforts should be made to reduce and avoid impacts on any discovered site, artefacts or yet-to-be-discovered archaeological sites.

10. Identification of Key Impacts

The key impacts of the proposed project on the archaeological and heritage resources will be the physical disturbance or destruction of sites or remaining within or close to the designated footprint of the proposed development and its associated surface works, and disruption of the landscape setting or physical context of the archaeological sites or remains. Such impacts will be both local,

in the sense of the specific site, and at the landscape level where the proposed project will take place.

11. Residual Cumulative Environmental Effects

Although some archaeological materials such as stone artefacts and consequently sites are likely to be destroyed or lost during the clearance of land and construction of other facilities necessary for prospecting and exploration activities. Similarly, the focus of mitigation measures in this report is to recommend the layout of the project to avoid any possibility of encountering significant heritage or archaeological sites and will thus make a negligible contribution to cumulative impacts. The cumulative impacts are deemed to be of low significance in this case but with project-specific mitigation as listed in section 16.2, this would drop to very low after mitigation.

11.1. Identification of alternatives

There are no located alternative sites for the proposed project now since the project is at an initial stage (exploration phase), however, the layout will be designed accordingly to avoid any damage to the already known and located archaeological/heritage sites including the built environments. This is to indicate that if the site is located already, the development project has to find an alternative location to either avoid the site completely, mitigate it or rescue it before any damage could be done, and to do this a permit from NHC will be required.

11.2. Anticipated Impacts on Visual and Landscape

All known significant archaeological and heritage resources will be/should be avoided by the proposed project (aside from the landscape where the proposed project will take place) i.e. the landscapes cannot be mitigated in the conventional archaeological sense, and impacts to them are contextual (visual impact affecting the sense of a place) mitigation usually involves avoidance, careful placement of the proposed project infrastructures and other development, or the creation of appropriate buffer zones and screens to minimize visual intrusion.

12. Management Plan and Mitigation Measures

Detailed mitigation measures are given herein in the form of recommendations (refer to the bulleted list in *Section 16.2* below under the conclusion and recommendation section). These mitigation measures will be included and implemented along with the general EMP of the project, as well as the implementation of the *Chance Find Procedures* and *Heritage Monitoring Plan* for the proposed project as set out in *Appendix I* below.

12.1. Conclusion and Recommendation

The Heritage Impact Assessment (HIA) conducted for Exploration License EPL10024 identified several heritage resources of cultural and historical significance like graves within and adjacent to the project area. Rock art sites are located outside the EPL boundaries as shown in **Fig 5** and are mapped accordingly. During the field survey, it was observed that the area surrounding the old ruin is heavily obscured by vegetation and terrain, which made it difficult to confirm the exact location and extent of the suspected graves. In light of this uncertainty, the archaeologist implemented a 4 km buffer zone encompassing the ruin, the Vryheid Family Graves, and the area where the suspected graves are believed to be located. This precautionary measure ensures the protection of all potential subsurface heritage features within this archaeologically sensitive zone.

Based on the findings, the heritage resources within EPL10024 are assessed as being of high cultural and archaeological significance. It is therefore recommended that:

- No exploration or ground disturbance should take place within the designated 4 km buffer zone.
- The buffer area is clearly mapped and treated as a “no-go” zone for all project activities.
- If future exploration activities are proposed in or near this area, they must be preceded by a detailed archaeological investigation and consultation with the National Heritage Council of Namibia and relevant traditional authorities.
- Ongoing community engagement with the //Khoadi //Hoas Conservancy, /Gaio-Daman Traditional Authority, and affected landowners should continue to ensure the preservation of local heritage values.

In conclusion, with the implementation of these mitigation measures, the proposed exploration activities under EPL10024 can proceed with minimal risk to heritage resources, provided that strict adherence to the buffer zones and heritage protection protocols is maintained.

12.2. Recommended Mitigation Measures

It is extremely important for the Project Proponent, and all those involved in the project to fully understand that all archaeological and paleontological objects and meteorites are the property of the State, except such an archaeological or paleontological object the private possession and ownership of which (a) was acquired not in contravention of **Section 12** of the National

Monuments Act, 1969 (Act No. 28 of 1969) or a law repealed by that Act; and thus, as part of mitigation measures, it should be noted that according to National Heritage Act No. 27 of 2004 that all activities that will involve digging or excavating the ground will require a permit from National Heritage Council of Namibia. Therefore, to prevent accidental damage to the archaeological landscape, including any potential sub-surface archaeological finds or features, the following mitigation strategies are proposed and recommended.

- If any archaeological material or human burials are uncovered during development activities, then work in the immediate area should be halted, the find would need to be reported to the heritage authorities and may require inspection by an archaeologist.
- Buffer zones should be maintained around known significant archaeological, historical or cultural heritage sites as far as possible. Graves, caves, rock shelters, stratigraphic profiles and areas with cultural significance are excluded from any development.
- A “No-Go-Area” should be put in place where there is evidence of sub-surface archaeological materials, archaeological sites, gravesites, historical, rock paintings, cave/rock shelters or past human dwellings. It can be a demarcation by fencing off or avoiding the site completely by not working closely or near the known site. The ‘No-Go Option’ might have a NEUTRAL impact significance (refer to *figure 36*).
- Direct damage to archaeological or heritage sites should be avoided as far as possible and, where some damage to significant sites is unavoidable, scientific/historical data should be rescued.
- Cognizance must be taken of the larger historical landscape of the area to avoid the destruction of previously undetected heritage sites. Should any previously undetected heritage or archaeological resources be exposed or uncovered during the development phases of the proposed project, these should immediately be reported to the heritage specialist or heritage authority (National Heritage Council of Namibia).
- The Proponent and Contractors should adhere to the provisions of **Section 55** of the National Heritage Act in the event significant heritage and cultural features are discovered in the course of developmental works.
- Whoever is going to be in charge of mitigation and monitoring measures should have the authority to stop any construction activities that are in contravention of the National Heritage Act of 2004 and National Heritage Guidelines as well as the overall project EMP.

It should be taken into consideration that, according to **Part VI sub-section (1), (2) or (3)** A person who contravenes these provisions commits an offence and is liable to a fine not exceeding N\$100 000 or to imprisonment for a period not exceeding 5 years, or to both such fine and such imprisonment. A Project Proponent should heed these recommendations and comply with the existing legislation and Act as reflected in this report.

12.3. Statement and reasoned opinion of the specialist

It is the specialist's opinion that the extent of the proposed project's footprint should be as minimal as possible not to impact other sites of significance. And thus, the Project Proponent and the exploration crew should adhere to and comply with the recommendations given, and the adoption of the *Chance Finds Procedure* should be integrated into the general EMP.

13. Bibliography

Kinahan, J. (2012) Archaeological Guidelines for Exploration & Mining in the Namib Desert

Mendelsohn, J. (2003). Atlas of Namibia: A Portrait of the Land and its People. Windhoek: The Ministry of Environment and Tourism of Namibia.

National Heritage Act 27 of 2004. 2004. Government Gazette.

Namibia's Environmental Assessment Policy (1995) for Sustainable Development and Environmental Conservation

Scherz, E.R. (1972) Felsbilder in Suedwest-Afrika: Teil II: die gravierungen in nordwest Suedwest-Afrika. Bohlau Verlag, Koeln

Kinahan, J. (2012) Archaeological Guidelines for Exploration & Mining in the Namib Desert

Mendelsohn, J. (2003). Atlas of Namibia: A Portrait of the Land and its People. Windhoek: The Ministry of Environment and Tourism of Namibia.

Miller, R., 1992. The mineral resources of Namibia. Windhoek: Geological Survey of Namibia, Ministry of Mines & Energy.

National Heritage Act 27 of 2004.2004.Government Gazette.

Namibia's Environmental Assessment Policy (1995) for Sustainable Development and Environmental Conservation

Miller, R., 1992. The mineral resources of Namibia. Windhoek: Geological Survey of Namibia, Ministry of Mines & Energy.

Lenssen-Erz, T & Vogelsang, R 2005 "Populating No-Man's-Land: Rock Art in Western Namibia", *Goodwin Series*, 9, Further Approaches to Southern African Rock Art, December, 54-62, [www] <http://www.jstor.org/stable/3858034> [opens new window] (accessed 11 Mar 2010).

Sampson, C. G. 1974. The Stone Age Archaeology of Southern Africa. New York & London: Academic Press Inc.

Appendix 1: Archaeological “Chance Finds Procedure”

This survey is based on surface indications alone, and it is, therefore, possible that sites or items of significance will be found by chance during development work. Therefore, this Chance Finds Procedure intends to provide the construction and exploration crews with general guidelines for the appropriate response to the discovery of known, unknown or suspected archaeological materials, including human remains, during Project activities. While *Chance Find Procedures* are valuable, they are not a substitute for prior assessment and evaluation of archaeological resources. The objectives of these guidelines are to promote the preservation and proper management of heritage resources that are unexpectedly encountered during Project activities and to minimize disruption to construction activities and scheduling.

A step-by-step *Chance Find Procedure* is provided below for archaeological sites and accidental findings. Contact information is as well provided in *Appendix 1* and the general Archaeological and Heritage Management Plan is set in *Appendix 2*.

Scope:

The “chance finds” procedure covers the actions to be taken from the discovery of an archaeological site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified people. This procedure is intended to ensure compliance with the relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “*A person who discovers any archaeological object must as soon as practicable report the discovery to the Council*”. The procedure of reporting set out below must be observed so that archaeological remains reported to the NHC are correctly identified in the field.

Project Manager or ECO/Site Manager/Supervisor must report the finding to the following competent authorities:

- **National Heritage Council of Namibia (061 244 375)**
- **National Museum (+264 61 276800),**
- **National Forensic Laboratory (+264 61 240461).**

Heritage Monitoring and Management Requirements

Throughout the development phases of the proposed project, monitoring is necessary to ensure compliance with measures agreed upon in the recommended mitigation as well as to assess how effective the mitigation measures are in protecting the values and significance of the heritage resources. This can be achieved through regular monitoring of the project site or random visits the compliance with measures outlined in the recommendation section is monitored, recorded, and reported. However, in principle, heritage monitoring and management should be conducted and implemented by an archaeologist/heritage specialist or trained personnel while other activities especially day-to-day monitoring can be done by Environmental Control Officer (ECO) or in some cases a trained Site manager can be responsible for this.

Site monitoring: As most heritage resources occur below the surface, all earth-moving activities need to be routinely monitored in case of accidental discoveries. The greatest potential impacts are the initial soil removal and subsequent earthworks during the construction or development of the area. The ECO should monitor all such activities daily. If any heritage resources are found, the *chance finds procedure* must be followed as outlined in **Appendix 1** and **2**.

Monitoring is generally only considered appropriate where changes are probable or likely, and where these changes could be significant and would require remedial or specific management measures. This process can be done in all stages of the development of the proposed project, and during the actual operational phases where more impact on archaeological and heritage resources is probable.

Appendix 1: Archaeological and Heritage Monitoring Measures for Proposed Project

Table 11: Chance Find and Heritage Monitoring Measures

Area/Site	Archaeological/Heritage Aspect	Potential Impact	Mitigation Measures	Responsible Party	Method Statement required
Chance Find (Chance Archaeological and Heritage sites (Accidental discoveries)	<p>General area was the the proposed project is taking place (i.e. proposed development or construction etc.) which may yield archaeological, cultural materials or human remains.</p> <p>This means that there are possibilities of encountering unknown archaeological sites during subsurface construction work which may disturb previously unidentified chance finds.</p>	<p>Possible damage to previously unidentified Archaeological and heritage sites during the construction phase.</p> <p>Unanticipated impacts on archaeological sites where project actions inadvertently uncovered significant Archaeological sites.</p> <p>Loss of historic cultural landscape;</p> <p>Destruction of burial sites and associated graves (if any)</p>	<p>In situations where unpredicted impacts occur construction activities must be stopped, and the heritage authority should be notified immediately.</p> <p>Where remedial action is warranted, minimize disruption in construction scheduling while recovering archaeological data. Where necessary,</p> <p>Implement emergency</p>	<p>Project Proponent- Contractor/ Exploration crews, Project Manager (PM) / Environmental Control Officer (ECO) or Site Manager, On-site/standby Archaeologist</p>	<p>Monitoring measures should be issued as instruction within the Project EMP.</p> <p>PM / ECO / Site Manager / Archaeologist</p> <p>Should monitor development works on sites where such development projects commence within the project site.</p>

Area/Site	Archaeological/Heritage Aspect	Potential Impact	Mitigation Measures	Responsible Party	Method Statement required
		<p>Loss of aesthetic value due to construction work</p> <p>Loss of sense of place</p> <p>Loss of intangible heritage value due to change inland use.</p>	<p>measures to mitigate.</p> <p>Where burial sites are accidentally disturbed during construction, the affected area should be demarcated as a 'no-go zone' by use of fencing during construction, and access thereto by the construction team must be denied.</p> <p>Accidentally discovered burials in a development context should be salvaged and rescued to safe sites</p>		

Area/Site	Archaeological/Heritage Aspect	Potential Impact	Mitigation Measures	Responsible Party	Method Statement required
			<p>as may be directed by relevant heritage authorities.</p> <p>The heritage officer responsible should secure relevant heritage and health authorities permit for possible relocation of affected graves accidentally encountered during construction work.</p>		
Compliance Review	<p>A review of archaeological and cultural heritage incidents, their impacts, mitigation used and success of mitigation should be conducted at a certain stage of the project. The review should be looking at mitigation measures in place, and ways of improvement if needed. This exercise can be done after every 6 months or whenever the Project Proponent sees fit. The overall objective is to ensure full compliance with relevant legislation, especially Under Section 5 (4) of the National Heritage Act No. 27 of 2004, Chance Find Procedure, and the recommendations made by the Heritage Specialist.</p>				

Appendix 2: Archaeological and Heritage Management Plan

Table 12: Management Plan

Area	Mitigation	Phase	Timeframe	Responsible party for implementation	Target	Performance Indicators (monitoring tool)
General project area more specifically the targeted areas and surrounding vicinity	Implement chance find procedures in case possible archaeological or heritage finds are uncovered or expected	Preconstruction and construction	Throughout the project (prospecting and exploration) and if the project will go to the next stage of mining then this management plan can still be used during the actual mining phase	Project Proponent, Contractors, and Exploration crews on site	Ensure compliance with relevant legislation and recommendations from the Author of this report and the National Heritage Act that aims to provide for the protection and conservation of places and objects of heritage significance.	ECO Checklist/Report

Appendix 4: CV of a Specialist



NKOSANA HLABANGANA

ERF 2754 DARLING STREET WANAHEDE WINDHOEK
+264 814650075 / +264 852650075 | hlabanganankosana@gmail.com

Objective

To enhance my professional skills, capabilities and knowledge in an organization which recognizes the value of hard work and trusts me with responsibilities and challenges.

Experience

- ♦ **St Augustines High School Penhalonga Zimbabwe** 01/01/2015 - 05/12/2015
Librarian
 - Collecting and cataloging library resources including books, films, and publications.
 - Helping people locate reference and leisure reading materials.
 - Maintaining library records and ensuring they are up to date.
 - Performing regular audits of the information and inventory on file.
 - Educating patrons on how to properly search for information using the library databases.
 - Managing budgeting, planning, and employee activities.
 - Overseeing the check-out process for books and other resource materials.
 - Organizing and hosting book sales, author signings, and other reading events.
 - Clarifying the use of library amenities and providing information about library policies.
 - Ensuring the library meets the needs of precise groups of its users, including disabled students.
- ♦ **MIDLANDS STATE UNIVERSITY GWERU ZIMBABWE** 05/05/2016 - 01/08/2016
Heritage and Sustainable Development: Norumedzo Forest Bikita Zimbabwe (Project)
 - Conducting interviews with both primary and secondary stakeholders -Excavating, dating and interpreting objects and sites of historical interest.
 - Documentation of both tangible and intangible heritage.
 - Extensive and intensive research designs.
 - Collecting data into a database and performing analysis to further understanding of the area and cultures being studied.
 - Assessing developer planning applications to ensure that any proposed construction/mining will not disrupt potentially valuable archeological sites.
 - Gathering data, capturing the information into databases and ensuring data is backed up.
- ♦ **Victoria Falls Safari Lodge** 07/01/2017 - 05/01/2020
Lodge Sales Assistant
 - Sending faxes/emails and answering phone calls.
 - Scheduling calendar appointments.
 - Making travel arrangements.
 - Taking minutes in meetings and preparing power point presentations.
 - Ensuring high levels of customer satisfaction through excellent sales service.- Lodge tour guiding.
 - Managing Lodge website.
- ♦ **MOUNT OF HOPE TRAINING INSTITUTE** 10/01/2021 - 30/04/2022
Administrator
 - Answering incoming calls; taking messages and re-directing calls as required - Dealing with email enquiries
 - Taking minutes
 - Diary management and arranging appointments, booking meeting rooms and conference facilities - Data entry.
 - General office management such as ordering stationary - Organizing travel and accommodation for staff and students.
 - Arranging both internal and external events.

- Maintaining the school social media accounts.
- Filing duties -storing hard copies of data in an organized manner to optimize retrieval.
- Creating accurate spreadsheets.
- Performing basic bookkeeping duties.

- **Outrun Consultants CC**

05/08/2022 - Till to date

Archaeologist

- Excavating, dating and interpreting objects and sites of historical interest.
- Documentation of both tangible and intangible heritage.
- Extensive and intensive research designs.
- Archaeological field work assessments for Archaeological Preliminary Reports.
- Collecting data into a database and performing analysis to further understanding of the area and cultures being studied.
- Assessing developer planning applications to ensure that any proposed construction/mining will not disrupt potentially valuable archeological sites.
- Gathering data, capturing the information into databases and ensuring data is backed up.

Education

- **MIDLANDS STATE UNIVERSITY GWERU ZIMBABWE**

2016

MIDLANDS STATE UNIVERSITY GWERU ZIMBABWE

BA HONOURS DEGREE IN ARCHAEOLOGY CULTURAL HERITAGE AND MUSEUM
STUDIES 2:2

Skills

- Good communication skills.
- Created, collected, edited, aggregated, and summarized data from multiple sources for reports and analysis, including GPS (Global Positioning System)
- Participated in excavations which required extensive measurements, calculations, data input and compilation, map plotting, and artifact analysis.
- Time management skills.
- Team work.
- Marketing/Selling skills.
- Willing and quick to learn.
- Computer literate.

Interests

- Surfing through internet
- Basketball
- Photoshop
- Being part of volunteering activities
- Traveling, meeting new people and admiring nature bounties

Languages

- English
- Ndebele
- Zulu
- Shona

Reference

- **Mr. Munemero - "St Augustines High School Penhalonga Zimbabwe "**
Chief Librarian
+263 772588285
- **Mrs. P. Tomu "Midlands State University Gweru Zimbabwe "**
Project Supervisor katwkwep@msu.ac.zw

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- **Mr. Josiah Mukutiri "Outrun Consultants CC"**
Director

Gender

- Male

Age

- 31/05/1991

Nationality

- Zimbabwean



NKOSANA HLABANGANA

MIDLANDS STATE UNIVERSITY



I certify that this document is a true reproduction/ copy of the original which was examined by me and that, from my observations, the original has not been altered in any manner

Signature: *[Signature]*

Bachelor of Arts Archaeology, Cultural Heritage and Museum Studies Honours Degree

We hereby Certify that

NKOSANA HLABANGANA

having completed the approved programme of study and having satisfied the Examiners, has this day been admitted by Senate to the

Bachelor of Arts Archaeology, Cultural Heritage and Museum Studies Honours Degree in the

LOWER SECOND Division

VICE CHANCELLOR

15/11/2016

DATE:

Gweru, Zimbabwe

REGISTRAR

CERTIFICATE

D N° 321



Namibia · Qualifications · Authority

Enquiries: Ms. S Shaanika

05 July 2024

Mr. Nkosana Hlabangana
PERSONAL COLLECTION

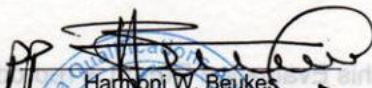
Dear Mr. Hlabangana (Passport No. FN284966)

QUALIFICATION EVALUATION REPORT

The **Zimbabwe General Certificate of Education at Ordinary Level** awarded to you by the Zimbabwe School Examinations Council in the Republic of Zimbabwe in November 2010 has been evaluated by the Namibia Qualifications Authority and found to be comparable to a **Certificate at NQF Level 3 (Three)** of the National Qualifications Framework for Namibia

The **Zimbabwe General Certificate of Education at Advanced Level (Two Subjects)** awarded to you by the Zimbabwe School Examinations Council in the Republic of Zimbabwe in November 2012 has been evaluated by the Namibia Qualifications Authority and found to be comparable to a **Certificate at NQF Level 4 (Four)** of the National Qualifications Framework for Namibia

The **Bachelor of Arts Archaeology, Cultural Heritage and Museum Studies Honours Degree** awarded to you by Midlands State University in the Republic of Zimbabwe in November 2016 has been evaluated by the Namibia Qualifications Authority and found to be comparable to a **Bachelor Honours Degree at NQF Level 8 (Eight)** of the National Qualifications Framework for Namibia


Harmoni W. Beukes
ACTING CHIEF EXECUTIVE OFFICER



Corner of Simeon Shixungileni and Dr. W Külz Streets, Windhoek

P Private Bag 13247, Windhoek, Namibia T +264 61 384 100 F +264 61 384 114 E info@namqa.org W www.namqa.org

Pasipoti iyi ine mapeji 48.
Iphasipoti le ilamakhasi angamatshumi amane lasificaminwe mibili 48.
This Passport contains 48 pages.

*Hurumende ye Zimbabwe inakumbirisa kumaani nani xoxhe
kubvumidza muridzi wepasipoti iyi kupfuura pasina
kumbunyikidzwa uye nokumupa rubatsiro
nokuchengelwa kwaanofanirwa kupiwa.*

Uhulumende we Zimbabwe ucela njalo ukhangelela ukuthi ingge ngubani okwethulwa kuye liphazisipoti avumele umnikazi wayo ukuthi edlule ebhululekile kungela kwengatshelwa njalo atholisewe uncedo lokuwikeleka ngokufaneleyo.

*The Government of Zimbabwe requests and requires all those
whom it may concern to allow the beaver to pass freely without
let or hindrance and to afford the beaver
such assistance and protection as may be necessary.*

NAMIBIAN POLICE FORCE
WINDHOEK

08 MAY 2024

PASSPORT

Type	State	Passport No / Passport Number
PN	ZWE	BE091971
Surname / Zita nemhu / Mbongo		
HLABANGANA		
Other names / Zita fihlo		
NKOSANA		
Nationality	Identity number	
ZIMBABWEAN	50126253G53	
Sex	Birth place / Zvokubokobokera / Zvokubokobokera	
M	MARONDERA	
Birth date / Zvokubokobokera / Zvokubokobokera		
31/05/1991		
Country of permanent residence		
ZIMBABWE		
Expiry date		Signature
10/04/2034		REGISTRAR GENERAL - HRE
Passport		

WANA HEDA P/S
CHARGE OFFICE

PNZWEHLABANGANA<<NKOSANA<<<<<<<<<<<<<<<<<
BE091971<6ZWE9105311M340410450126253G53<<<48

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