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**21 October 2025**

# Heritage Impact Assessment (HIA) Report for the Proposed

## KOKOSEB GOLD MINE PROJECT ON EPL 4818, ERONGO REGION, NAMIBIA

**FINAL REPORT**

PREPARED FOR:

**Environmental Compliance Consultancy (ECC)**

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## QUALIFICATIONS AND EXPERTISE OF THE CONSULTANT

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|---|---|
| RESPONSIBILITY ON THE PROJECT | Heritage impact assessment for the proposed Kokoseb Gold Mine project on EPL 4818, Erongo Region, Namibia. |
| QUALIFICATIONS | PhD & Master's Degrees in Quaternary and Prehistory (MNHN and UNIFE) & Bachelor's Degree in History and Geography (UNAM). |
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| EXPERIENCE | Dr Nankela worked as an Archaeologist at the Namibia Heritage Council (NHC) for more than a decade where she has conducted extensive archaeological, anthropological, historical research and various assessments across Namibia, developed and implemented heritage policies and systems. |
| HERITAGE PERMIT NO. | 06/2024 |
| REPORTING REQUIREMENT | National Guidelines for Heritage Impact Assessment in Namibia (2021) by the National Heritage Council as per the National Heritage Act, (No. 27 of 2004). |

## DECLARATION

I, a duly authorised representative of Research Culture Heritage Services (RCHS), hereby confirm my independence as a specialist and declare that:

1. Neither I nor the RCHS CC have any financial or any other personal interests in the Kokoseb Gold Mine project on EPL 4818 other than consultation fees for work performed on the project.

2. The RCHS specialist was appointed on a strictly professional basis to conduct a heritage impact assessment in line with the National Heritage Act (No. 27 of 2004) and its Regulations (Government Notice 106 of 2005), guided by the "Guidelines for Heritage Impact Assessment (HIA) of 2021" from the Heritage Council as well as the Environmental Management Act (No. 7 of 2007) and its Regulations (Government Notice 30 of February 6, 2012).

Dr. Alma Nankela,
Archaeologist & Heritage Management Specialist

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## EXECUTIVE SUMMARY

This heritage impact assessment and survey was carried out between the 02nd and the 07th of September 2024, within and immediate surrounding areas of the proposed Kokoseb Gold Mine project on EPL 4818, which lies between Uis and Okombahe districts in the Erongo region. The desk study, which was complemented by the field survey, located a total of *twelve* (n = 12) sensitive heritage features, of which eight (n = 8) fall directly within the proposed EPL 4818, including *three* (n = 3) historic water sources, *one* (n = 1) cemetery containing 20 unmarked graves, *one* (n = 1) historic stone-built ruin, at least *one* (n = 1) Christian grave containing 4 unmarked graves, an additional *(n* = 1) historic graveyard containing 30 graves, and *one* (n = 1) historic well (water point). In terms of the National Heritage Act (27 of 2004), these heritage features are significant and warrant legal protection. They are sensitive, but their vulnerability varies. According to the proponent, only sites 1-5 and 7 might be impacted by mining operations and more specifically sites 4 and 7. An additional *four* (n = 4) heritage features have also been recorded during field surveys in the immediate surroundings of the project footprint. These comprised of *one* (n = 1) prehistoric rock art site, *one* (n = 1) historic mine shaft, *one* (n = 1) built ruins, and *one* (n = 1) Christian grave site containing two recent graves. Some of these features are relevant in terms of the National Heritage Act (27 of 2004), while others fall under the protection of the Burial Places Ordinance (27 of 1966) in terms of the Local Authorities Act (No. 23 of 1992) and regulated by the Cemetery Regulations (No. 4291, Government Gazette, July 13, 2009). Therefore, this report presents a detailed assessment and provides guidance for the handling and discovery of these heritage features within and around the footprint of the project. All identified sensitive and vulnerable resources requiring further protection and mitigation measures devised here should be implemented while adopting the Chance-Find Procedure appended to this report.

# 1. PROJECT BACKGROUND

Mandarin Investments (Pty) Ltd (the "Proponent"), a joint venture between Damaran Exploration Namibia (Pty) Ltd and Epangelo Mining Company (Pty) Ltd, is the holder of licence EPL 4818, and intends to develop the Kokoseb Gold Project. The site is located between approximately 35km east northeast of Uis and 25km northwest of Okombahe districts in the Erongo Region. This site is bordered to the south by the C36 main road (**Figure 1**). The project development envisioned for EPL 4818, and its associated infrastructure development shall occupy a surface area of about 74 km radius. Therefore, it has the potential to cause significant negative impacts on the receiving physical, biological, socioeconomic, and cultural environment. As such, these activities cannot be undertaken without an Environmental Clearance Certificate as per the Environmental Management Act (No. 7 of 2007) and the Environmental Impact Assessment (EIA) Regulations (Government Notice 30 of February 6, 2012). In order to obtain an environmental clearance certificate, the proponent has appointed Environmental Compliance Consultancy (Pty) Ltd (ECC), as the independent Environmental Assessment Practitioner (EAP) to undertake an environmental and social impact assessment (ESIA) in terms of the Environmental Management Act No. 7 2007 and its Regulations for the proposed EPL 4818.

The heritage component in Namibia is a critical and integral part in the overall EIA process where the specialised heritage studies are required to examine whether there are sensitive heritage features within the footprint of the proposed project that will be negatively impacted. The Heritage Impact Assessment (HIA) studies therefore need to correctly identify, accurately record, report, interpret, and appropriately estimate the significance of potential heritage resources within the footprint of the project in an effort to fulfil the requirements of the National Heritage Act No. 27 (2004) and its Regulations (No. 106 of 2005) and the implementation of the National Guidelines for Heritage Impact Assessment in Namibia (2021), in which a process of review, verification, will be conducted by the heritage authority in order to clear the heritage aspects of the project.

The significance of heritage resources (sites, structures, and artefacts) is determined by means of assessing their archaeological, palaeontological, historical, aesthetic, technological, and scientific value in relation to their uniqueness, condition of preservation, and research potential. These aspects are not mutually exclusive, and the evaluation of each resource is done following the significance criterion ratio outlined in the Guidelines for Heritage Impact Assessment (HIA) of 2021 from the National Heritage Council of Namibia (NHC). Consequently, ECC subcontracted the services of the Research Culture Heritage Services (RCHS) to carry out the heritage surveys and impact assessments as per the terms of reference (TOR).

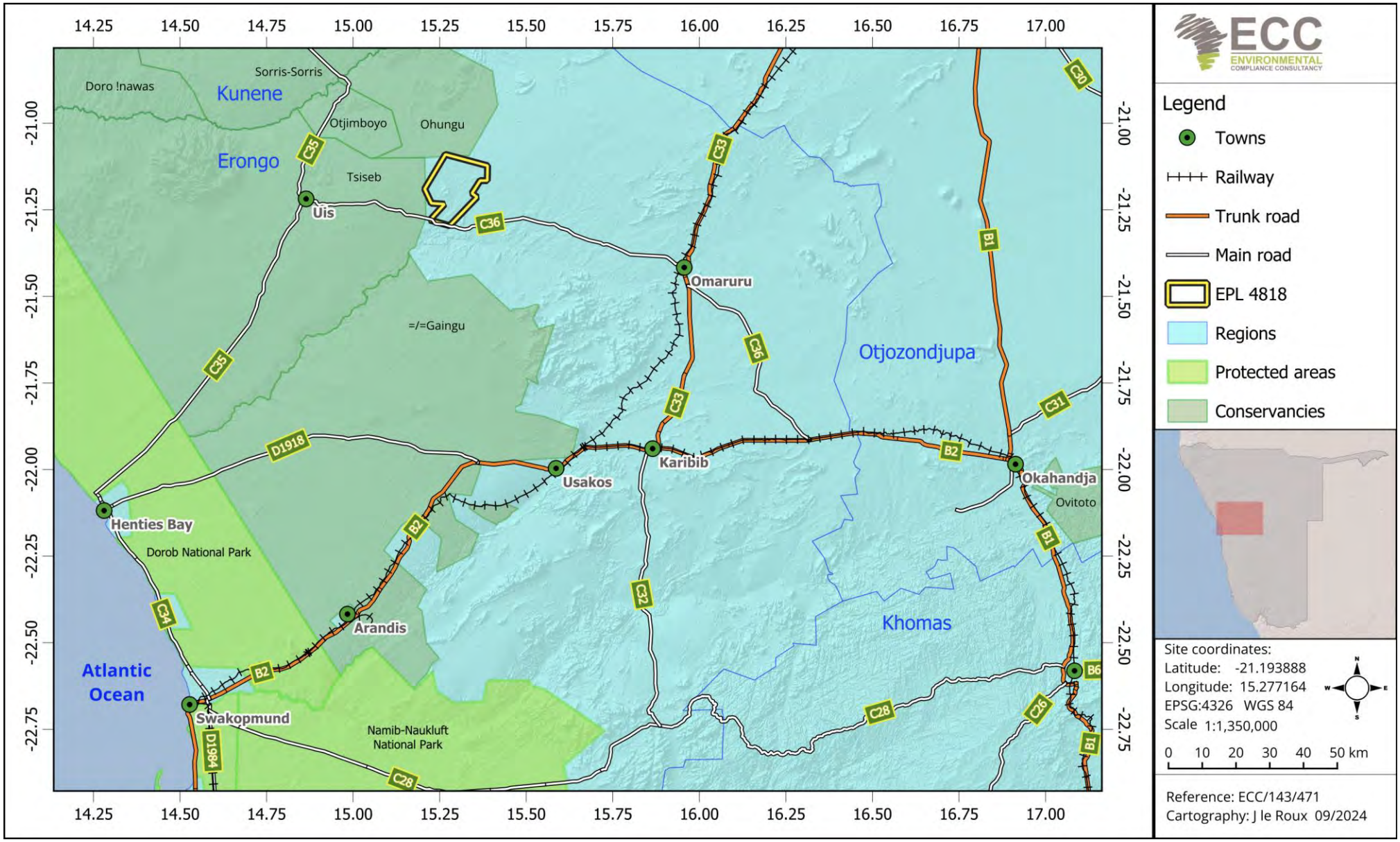


*Figure 1: The location of the EPL 4818 within Erongo Region, Namibia. Source:ECC-143-471-REP-04-D, December 2024, (Page 19:2024).*

## 2. TERMS OF REFERENCE (TOR)

The survey and HIA study aimed for the specialist to:

a) Conduct and identify possible heritage resources within and immediate surrounding the footprint of the project area.
b) Assess potential impacts on archaeological and heritage resources arising from the proposed activities.
c) Establish the nature, extent, and probable heritage significances through existing records and interviews from local communities within the proposed project.
d) Determine the nature and degree of the vulnerability of the heritage resources within the proposed project.
e) Develop heritage management measures for the preservation, protection, or mitigation of impacts to identified cultural resources that should be proposed to conclude the assessment.

## 3. PROJECT DESCRIPTION

Information contained in the project background information document (BID) (see ECC Report No: ECC-143-471-BID-02-A), indicates that the proponent's main goal for the exploration of the mineral potential of the Kokoseb Gold Project is for the mining of base and rare metals and precious metals. Following the exploration activities in 2021, available information indicates that the Kokoseb Gold Project is envisioned as a conventional open-pit operation, employing drill-and-blast techniques, load-and-haul processes, crushing, grinding, and carbon-in-leach processing. Activities will be undertaken in close proximity to the identified pit within the proposed EPL 4818 (**Figure 2** and **Figure 3**). The construction phase for the Project will comprise of various activities such as: (a) the construction of access tracks and roads, where existing tracks cannot be utilised for the fleet of vehicles; (b) clearing of vegetation for the creation of tracks, an open pit mine, other infrastructure such as the tailings, waste rock dumps, etc. and survey access; (c) the construction of the plant infrastructure; (d) establishment of infrastructure for fuel and chemical storage. During the operational phase, mining activities shall take place within the boundaries of EPL 4818. However, the actual mining will take place within a new Mining Licence restricted to the northern half of EPL 4818.

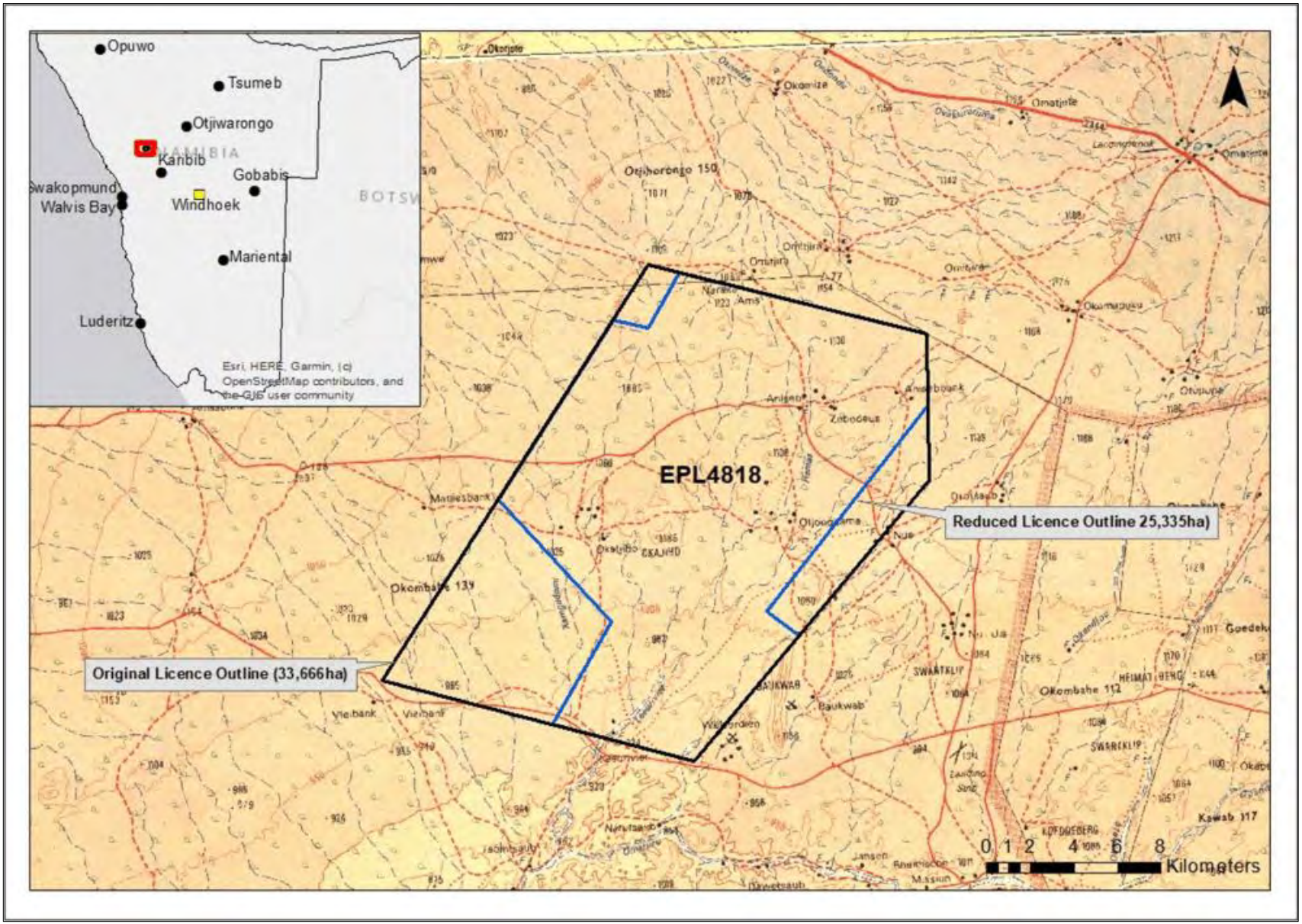


***Figure 2***: *The topographic map of the EPL 4818 indicating the surface area and its boundary. Source: ECC Presentation, May 2024, (Page 11:2024).*

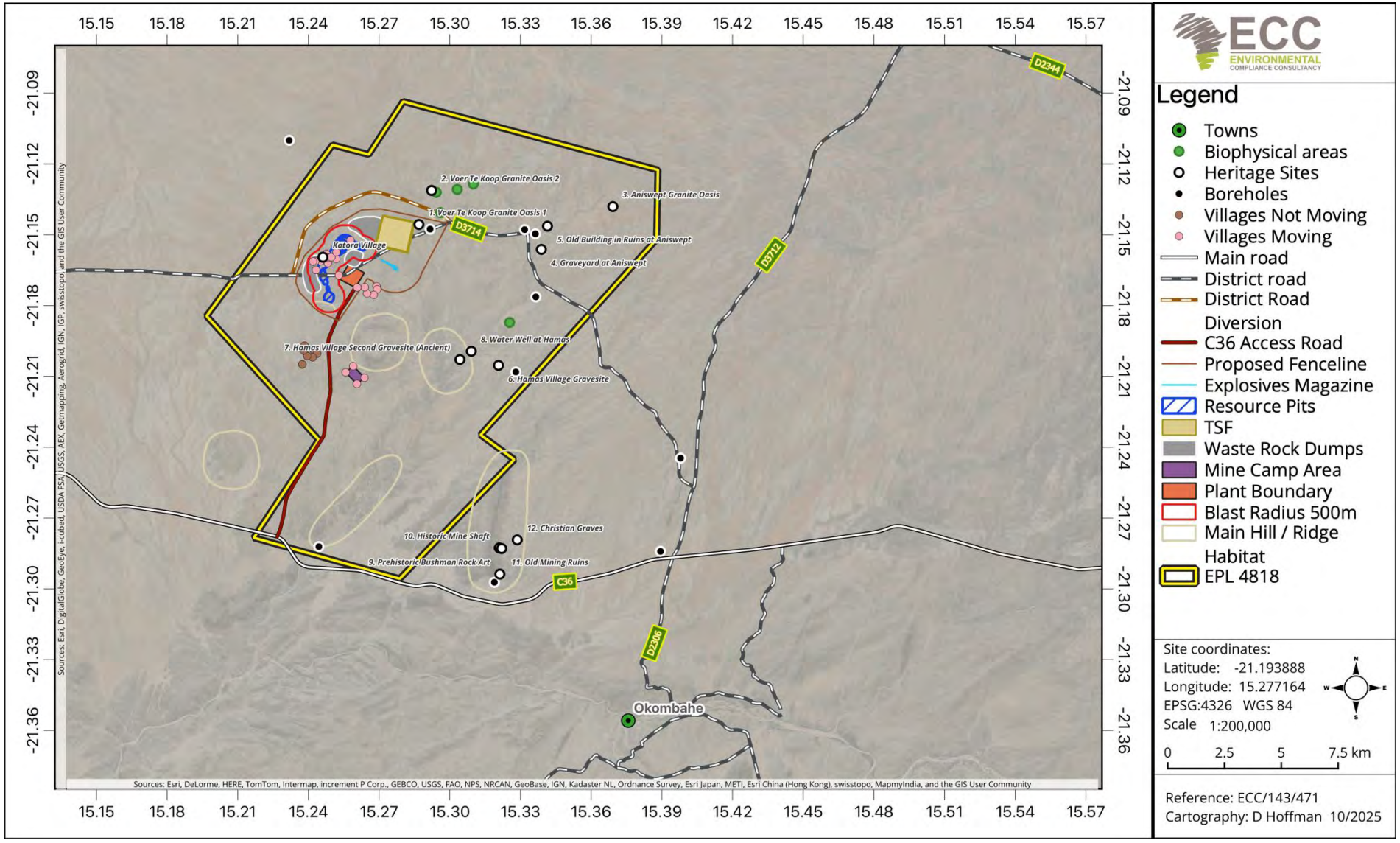


***Figure 3**: Project Site Layout indicating mining and operational areas, biophysical areas and associated heritage sites. Source: ECC, July 2025.*

## 4. ASSUMPTIONS AND LIMITATIONS

This survey and impact assessment assumes that all background information provided by the Proponent is accurate and up to date. The assessment therefore focused mainly on the project area and its immediate surrounding of the proposed Project (about 3 km). It does not apply to and may not be used for any other future developments and expansions of the project outside the assessed areas. The available heritage records from previous research undertaken in the same general area were used in this study to provide baseline information relevant to the project. These records were then augmented by interviews conducted among the affected local communities as part of the community consultations to record possible unknown heritage resources in particular, historic graves or burial grounds and other intangible or sacred sites of community value. This heritage field survey and assessments was only limited to the extensive examination of the project surfaces. Therefore, no sub-surface research was conducted, therefore, it is always possible that hidden or subsurface archaeological remains could be overlooked. Consequently, the appended Chance Find Procedure Guidelines should be adopted for use in managing such subsurface or previously unidentified remains. Other limitations to the study were the language barriers experienced during the interviews in a few affected local communities. Nonetheless, the communities were instrumental in aiding the field survey, where a number of significant heritage features were recorded. With regards to the issues of accessibility to the Project sites, no access permits were required as the researcher held the Heritage Research Permit 06/2024 issued from the National Heritage Council, valid from February 2024 to February 2025.

## 5. LEGAL REQUIREMENT

The National Heritage Act (No. 27 of 2004) in Namibia deals with the identification, protection, preservation, management, and promotion of Namibia's heritage resources. Part 1 of the Heritage Act defines 'heritage resources' as both *places* and *objects* of archaeological, palaeontological, and rare geological objects, including meteorites, cultural, historical, ethnographical, scientific, technological, and social significance. The significant places also include "the natural or existing condition or topography of land," as well as "trees, vegetation, topsoil, or bodies of water" that maintain the ecological functioning and integrity of the specific area. In these aspects, the Act provides legal protection for both tangible and intangible heritage resources. The newly developed "Guidelines for Heritage Impact Assessment in Namibia of 2021" have been formulated for the implementation of the National Heritage Act, especially Section 51 (3), which outlines requirements for heritage impact assessments in Namibia. The aspect of intangible heritage may include sacred sites: "places to which oral traditions are attached to, or which are associated with living heritage, graves and burials, historic settlements, and military sites by means of a building, garden, or tree," which are considered to have heritage significance in Namibia.

The significance of the heritage resources (sites, structures, and artefacts) is determined by means of their typological classifications defined in Part 1 of the Act in relation to their uniqueness, condition of preservation, and research potential. Therefore, these aspects are not mutually exclusive, and the evaluation of each resource is achieved following the significance criterion ratio entrenched in the Guidelines for Heritage Impact Assessment. NHC maintains a heritage register in accordance with Part IV of the Heritage Act. The register lists 'significant heritage' places and objects of national importance. The register allows new approved entries to be added based on an assessment of their heritage significance and, thereafter, publication of the sites in the Government Gazette. As a result, Section V of the Heritage Act applies immediate legal protection to heritage sites added to the register to prevent unnecessary disturbances or damages to heritage resources as an inevitable result of infrastructure development, unless permitted in terms of Section 48 of the Act. Moreover, aspects concerning the conservation, management, and impact assessment studies of cultural heritage resources for projects such as the proposed mining development and associated infrastructure to the EPL 4818, are also addressed in the Environmental Management Act, 2007 (No. 7 of 2007). The need for environmental impact assessment forms part of the Act, and this requires that Namibia's cultural heritage be protected and respected for the benefit of present and future generations.

## 6. METHODOLOGY

The assessment methodology adopted for the heritage impact assessment within and around the EPL 4818 during the field survey and assessment followed Guidelines for Heritage Impact Assessment in Namibia (2021) devised by the NHC. The desktop phase involved a high-level literature review to identify heritage resources and areas of potential heritage sensitivity in the project area. As a result, archival research of databases from the NHC, the National Museum of Namibia (for historic and archaeological resources), and the National Earth Science Museum at the Geological Survey of Namibia (for paleontological and listed rare geological features) was conducted to establish if there are listed significant heritage features within or around the project. In addition to archival research, available reports yielded from research carried out in vicinity of the project area were useful in providing baseline information about the project. Field investigations included extensive examination of the site surfaces through field transect approaches, such as walking on foot and by vehicle across the landscape in parallel lines of about 15m intervals within the limit of the project while recording surface features using conventional criteria of physical setting and archaeological affinity through photography, general description, and GPS locations to aid the field survey. Transects were selected on the basis of the aerial photography and 1: 50 000 topographic map sheet, to provide maximum coverage of low and high ground in between. Local communities were interviewed to provide information on burial places and other sites of heritage significance. It is important to point out that no surface collections of heritage materials were made during this survey. Furthermore, no sub-surface heritage features were

recorded during this field survey and assessment, and it cannot be ruled that they are not in existence. Therefore, in the unlikely event that possible hidden or buried archaeological, palaeontological or historical remains are to be exposed during various phases of this infrastructure development (i.e. site clearing; operation and decommissioning phase), the appended Chance Find Procedure Guidelines should be adopted for use in managing such subsurface or previously unidentified remains.

The objectives of the impact assessments are to identify potential heritage resources within the footprints of the Project and its immediate surroundings and to find best practice measures to enhance positive impacts and avoid, minimise, or mitigate the negative impacts, either by recording or preservation. If possible, any form of impact is to be avoided by finding alternatives to damage or destruction. Actions that cannot be avoided or minimised ought to be mitigated in an effort to reduce the impact as much as possible. This procedure is dependent on the size of the site, its state of preservation, and its values and significance. The principle behind the mitigation is that no final decision on the site's future can be made until it has been demonstrated that all measures to avoid, minimise, and mitigate have been fully explored. In Namibia, the significance and vulnerability rating of heritage impact assessment follow a standardised methodology developed by the Quaternary Research Services (Kinahan 2012) and adopted by the National Heritage Council on the basis of an evaluation within its Guidelines for Heritage Impact Assessment (2021) shown in **Table 1** and **Table 2**.

***Table 1:*** *Heritage Significance rating table with key attributes adopted by the National Heritage Council, 2021.*

| LEVEL OF SIGNIFICANCE | GRADING | DESCRIPTION |
|---|---|---|
| Exceptional/upper higher | 5 | • Major national heritage resources.<br>• Rare & outstanding example.<br>• Containing unique evidence of high regional & national significance. |
| Considerable high | 4 | • Very important to the heritage of the region.<br>• High degree of integrity/ authenticity.<br>• Multi-component site and objects.<br>• High research potential. |
| Moderate | 3 | • Contributes to the heritage of the locality and region.<br>• Has some altered or modified elements, not necessarily detracting from the overall significance of the place.<br>• Forming part of an identifiable local distribution or group.<br>• Research potential. |
| Low | 2 | • Isolated minor finds in undisturbed primary context, with diagnostic materials.<br>• Makes some contribution to the heritage of the locality, usually in the combination with similar places or objects. |
| Little | 1 | • Makes little contribution to the heritage resources of the locality. |

| LEVEL OF SIGNIFICANCE | GRADING | DESCRIPTION |
|---|---|---|
| | | • Heritage resources in a disturbed or secondary context, without diagnostic or associated heritage. |
| Zero/ no significance | 0 | • Absence of heritage resources.<br>• Highly disturbed or secondary context, without diagnostic or associated heritage. |

***Table 2**: The vulnerability rating table with key attributes adopted by the National Heritage Council, 2021.*

| VULNERABILITY RATING |
|---|
| 0. Not Vulnerable.<br>1. No threat posed by current or proposed development activities.<br>2. Low or indirect threat from possible consequences of development (e.g. soil erosion).<br>3. Probable threat from inadvertent disturbance due to proximity of development.<br>4. High likelihood of partial disturbance or destruction due to close proximity of development.<br>5. Direct and certain threat of major disturbance or total destruction. |

In an effort to measure the sensitivity of archaeological sites, considering their significance and vulnerability rating in Tables 1 and 2, the assessment also estimated the extent of the possible impact, the magnitude of the impact, and the duration of these impacts on sensitive heritage resources. The scales of estimation developed by Quaternary Research Services (Kinahan 2012) are replicated below in **Table 3**.

***Table 3**: Assessment criteria for the evaluation of cumulative impacts on archaeological heritage sites adopted by the National Heritage Council, 2021.*

| CRITERIA | CATEGORY | DESCRIPTION |
|---|---|---|
| Extent or spatial influence of impact | National<br>Regional<br>Local | Within Namibia<br>Within the Region<br>On site or within 200m of the site impact |
| Magnitude of impact (at the indicated spatial scale) | High<br>Medium<br>Low<br>Very Low<br>Zero | Social and/or natural functions and/ or processes are severely altered.<br>Social and/or natural functions and/ or processes are notably altered.<br>Social and/or natural functions and/ or processes are slightly altered.<br>Social and/or natural functions and/ or processes are negligibly altered.<br>Social and/or natural functions and/ or processes remain unaltered. |

| CRITERIA | CATEGORY | DESCRIPTION |
|---|---|---|
| Duration of impact | Short Term<br>Medium Term<br>Long Term | Up to 3 years<br>4 to 10 years after construction<br>More than 10 years after construction |

## 7. COMMUNITY CONSULTATION

The public participation process is a critical and integral part of the HIA process, and it was deemed necessary that affected local communities from Farms Aniswept, Katora and Heins, Okombahe settlement and those from Hamas farm have been engaged on heritage matters with respect to the proposed EPL 4818 mining development in an effort to provide their inputs into the planned development as the impacts may directly or indirectly affect them. These consultations provided the stakeholders with the opportunity to report relevant heritage features known by the community in an effort to prevent any possible disturbance and damages while supplementing secondary data and bridging gaps in heritage knowledge of the area. As a result, key heritage features, such as grave areas and historic waterpoints significant to communities living near the proposed development, were recorded so that they would not be directly impacted by the proposed mining activities.

The heritage consultation on the proposed EPL 4818 mining and related infrastructure development was conducted prior to and during the field survey with the community directly affected and/or interested and key stakeholders. Focus group interviews were held with key community members and questionnaires administered, which included Ms. Vallery Eibes, one of the affected members from Farm Katora whose parents' farmland falls directly within the EPL 4818 and is surrounded by the planned open pit mine to the south and southeast and waste dump rock to the west (see **Figure 4**). Although there are no registered or known heritage resources within this farm, she reported that people from Farm Katora, Hamas and Aniswept migrated to this area earlier and intensely between 1983 and 1984 from Omaruru and Paresis. Over the last 50 years, they have been burying their dead at the graveyard on Farm Aniswept to date. Another key community member engaged is Ms. Juliane Engelbrecht (**Figure 5** right) living at Heins village within the boundaries of the mining licence. However, she was not aware of any heritage site within the vicinity of her village except for the rock paintings located a few kilometres to the southeast of her homestead (**Site 09**). Finally, Mr. Diego Eiseb, who was instrumental in showing heritage resources within and around Hamas village and who works as a casual labourer at Kokoseb gold mine (**Figure 5** bottom).

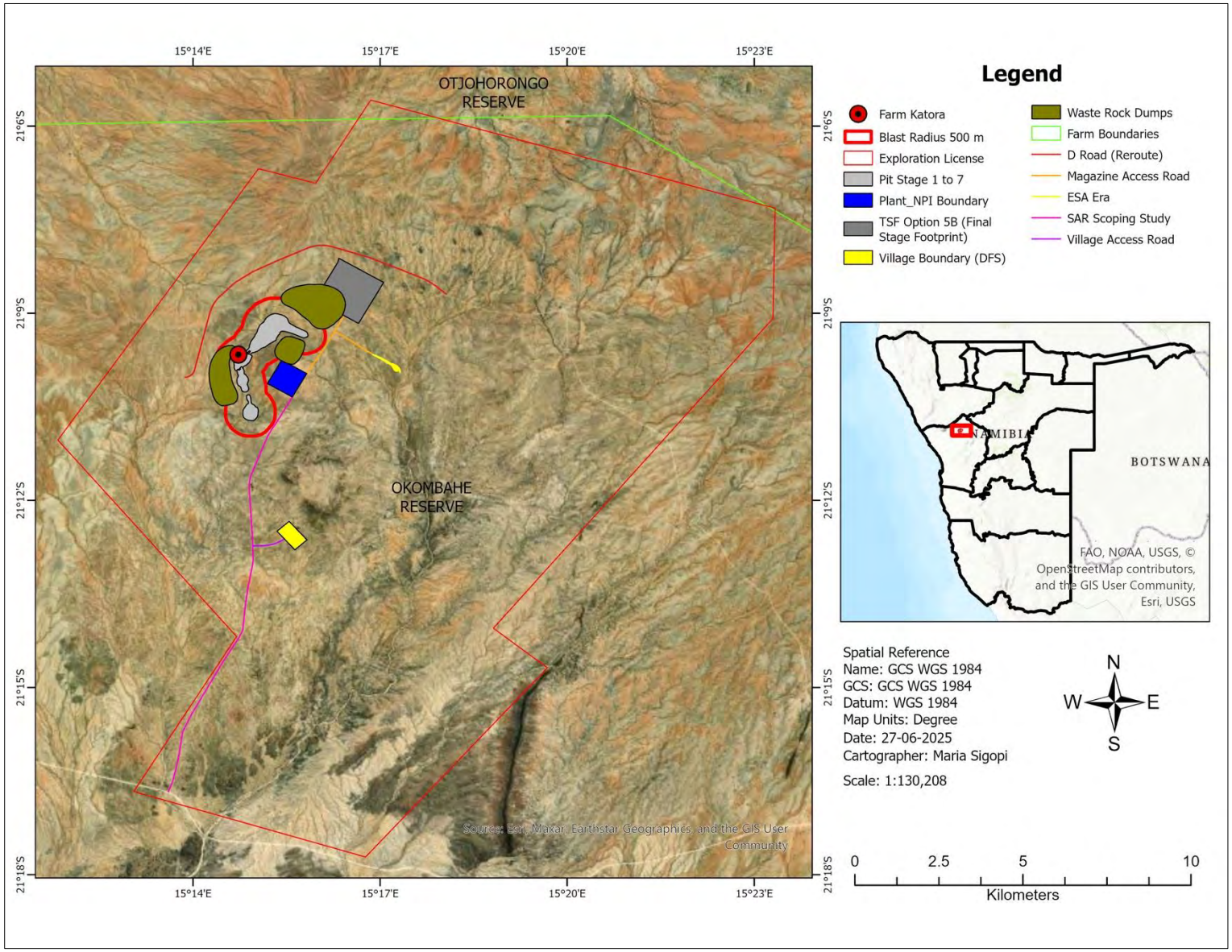


***Figure 4**: An aerial map of the proposed Kokoseb Mine Plan in relation to the location of Farm Katora within the EPL 4818. Cartographer: (Maria Sigopi at RCHS, June 2025).*

***Figure 5****: Above left image is Ms. Eibes, Right image is that of Ms. Engelbrecht sitting next to Mr. Gurirab, while below image is that of Mr. Diogo Eiseb at one of the historic wells. Source: (RCHS, 2024i).*

# 8. BASELINE ENVIRONMENT

The EPL 4818 falls between Uis and Okombahe District, which bordered Tsiseb and Ohungu Nature Conservancies. This area has been classified as a semi-arid climate by the Köppen climate classification. Its close proximity to the Brandberg and Erongo Mountains meant that the distribution of florals is compounded within the transitional zone between the Namib Desert, shrubland, and grassland (**Figure 6**). The Transitional Belt/Zone is characterised by a gradual increase of vegetation from the desert, and the eco-zone influencing such distribution includes the sparse plains with savannah grassland, the granite kopjes, and the woodland of the river courses. Various plant species consist of wide expanses of undulating shrub steppe with zones of thicker vegetation, including *Acacia albida*, *A. horrida, A. giraffae, Tamarix, Pseultdebenus, Zizyphns Mucronata*, *Euphorbia,* and *Colophospermum* (mopane trees), *Cyphostemma currorii*, *Grewia flavescens,* and *Welwitschia mirabilis*. Species such as *Persica, usneoides*, and *Faidherbia albida,* the devil's claw (*Harpagophytum procumbens subsp. procumbens)*, tsamma melon (*Citrullus lanatus)*, quiver tree (*Aloe dichotoma*), and the red thorn (*Acacia reficiens*) (Mendelsohn et al., 2009), are found mainly in the plains, river courses, and their immediate surfaces. No wildlife was observed during the field survey; however, ostriches, a few small antelopes, and jackals have been reported by the local communities. There is, however, land-based economic activity in this communal farming area with extensive livestock farming.

***Figure 6**: Vegetation cover within EPL 4818. Image credits: (RCHS, 2024i).*

## 8.1 GEOLOGICAL SETTING

The available BID document indicates that the geological setting of the EPL 4818 lies within the Northern Central Zone of the Pan-African Damaran Orogenic Belt, which is underlained by neo-proterozoic metasediments of the Arandis, Karibib, and Kuiseb Formations belonging to the Swakop Group (**Figure 7**). The mineralogical deposit that underlies the geology of this area is widespread and variable in style. Possible mineral occurrences within the vicinity indicate the area has a potential to host base metals, precious metals, and industrial mineral deposits as its lithology is comprised of the following geology: reddish augnegneisis, metabasalt, calc-silicate rocks, quartzite biotite granite, granodiorite, mica, mica schist, impure marble, quartz diorite, sand gravel, and calcrete (**Figure 8**). The gold mineralisation appears to have been discovered within the Kuiseb Formation metasediments, which are extensively intruded by both late syn-tectonic and post-tectonic granites and minor N-S to NNE-SSW trending mafic dykes. Visible in the environment today are numerous rock outcrops (**Figure 9**) of the underlying rocks and the superficial covering of sand, limestone, and float from dolerite ridges, porphyry, crystalline limestone, and schists.

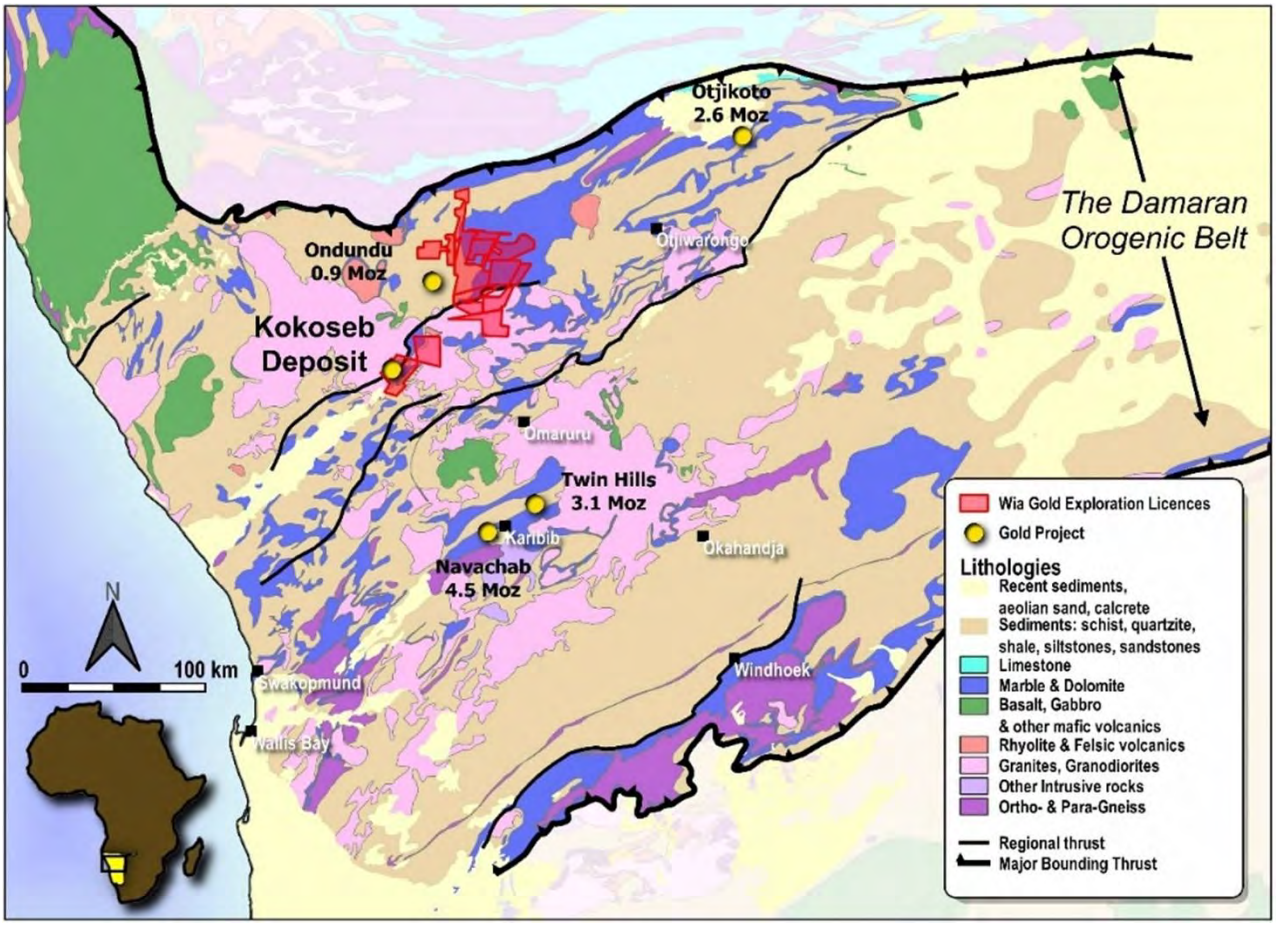


***Figure 7:*** *The geological setting of the EPL 4818 indicating the location of Kokoseb deposit in relation to other key gold deposits in central western Namibia. Source: https://wiagold.com.au/kokoseb-gold-project-namibia/*

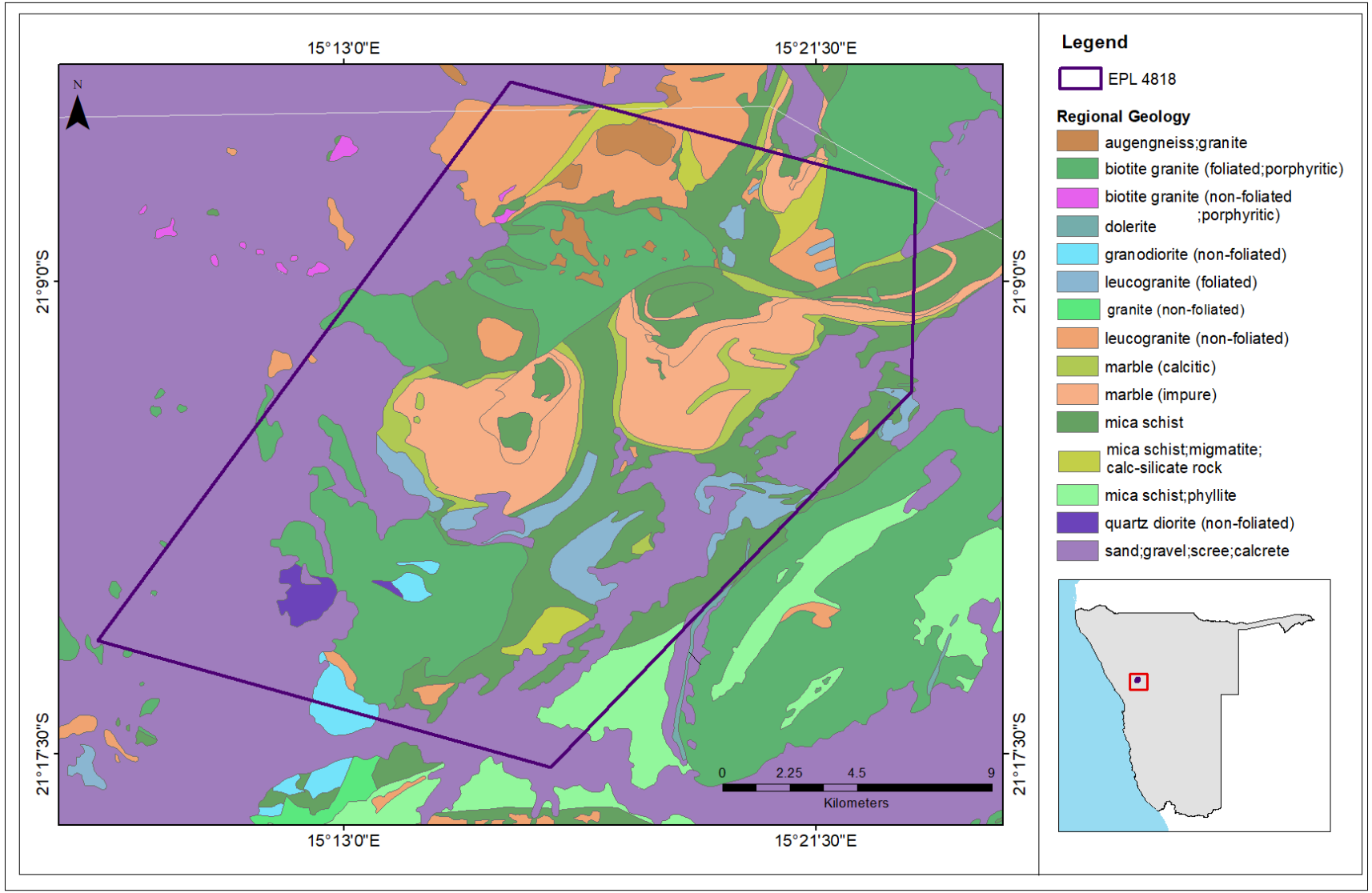


***Figure 8**: The geological setting of the EPL 4818 mining development indicating the main lithologies. Cartographer: (Maria Sigopi at RCHS, 2024i).*

***Figure 9:*** *Some granite outcropping features within the EPL 4818. Source: (RCHS, 2024i).*

## 8.2 HERITAGE SETTING

Erongo Region has a wealth of archaeological evidence associated with hunting and gathering as well as nomadic pastoralists who declined and collapsed in the aftermath of historic contact with Europeans (**Figure 10**). The principal sites of highest concentrations recorded thus far are in the granitic areas of the Brandberg Mountains (see Pager 1989–2006; Lenssen-Erz 2001; Lenssen-Erz 1997; Gwasira 2011); Erongo Mountains (see Nankela 2013; 2017); as well as the Spitzkoppe Mountain (see Kinahan 1990; Nankela 2019) chronologically dated during the Holocene Period, over the last 6,000 BP. However, no available baseline archaeological record exists within the EPL 4818. The only existing data is the preliminary archaeological survey carried out by Nankela (2020) within #Eseb conservancy around the Okombahe area. Such a preliminary survey yielded a number of archaeological sites, including key rock art sites, and other heritage resources that have been recorded in close proximity to the EPL 4818 (Site 09 to Site 12) that were also mentioned by the local communities.

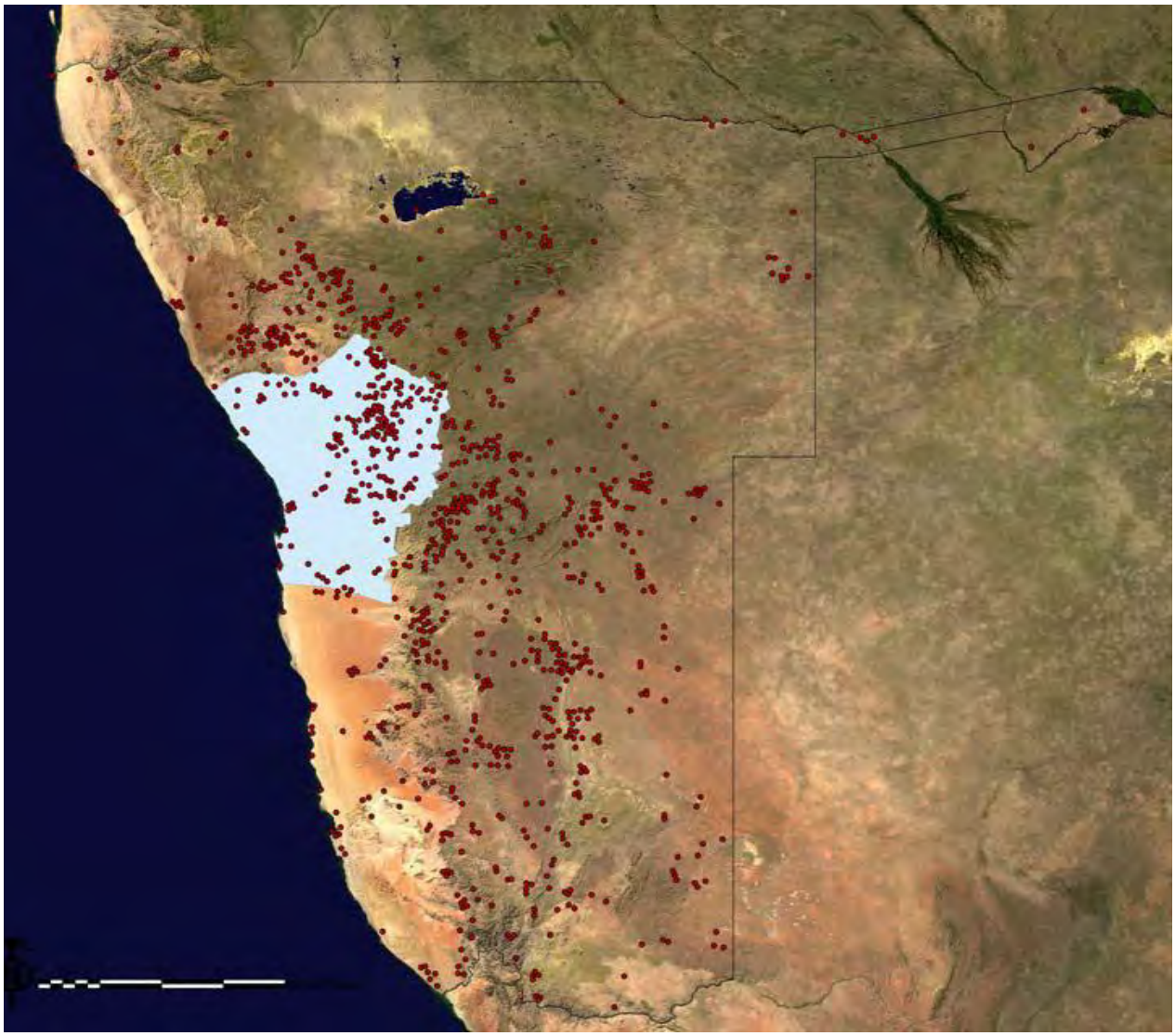

***Figure 10**: General distribution of archaeological sites in Namibia, reference to key Erongo region sites (insert is of central Namibia). Map Credit: (J. Kinahan, 2012).*

Historical accounts suggest that this area became a designated, "homeland", area by the "Odendaal Plan" of 1968 for the Damara-speaking communities made up of small, interrelated, kin-based clans (Rohde et al., 1997). It is believed that the Damaras had access to communal farming areas on an ad hoc basis, and with the abolition of Namibian pass-law legislation in 1976, the majority "immigrated" or were forcibly resettled to various parts of the country, notably in areas of Uis, Okombahe, Otjimbingue, Spitzkoppe, and Tubusis, both in the Erongo Region of Namibia (!Owos-oab (2014). The majority of Damara-speaking people settled at Okombahe and surrounding Uis district after the establishment of the Rhenish mission in 1870 in an attempt to escape drought, diseases, and territorial restrictions imposed by German settlers, where they converted to Christianity and began to cultivate gardens on the banks of the Omaruru River. Today, this semi-arid farming area has a homogenous farming pattern, which is customarily stock raising. It is regarded as the capital of the Nûkhoen Damara tribe. Remnants of the previous Damara occupants within and around the EPL 4818 are still found today with some reported in this report.

## 9. RESEARCH FINDINGS

The field survey and assessment located at least twelve (12) sensitive heritage features relevant in terms of the National Heritage Act (27 of 2004) (

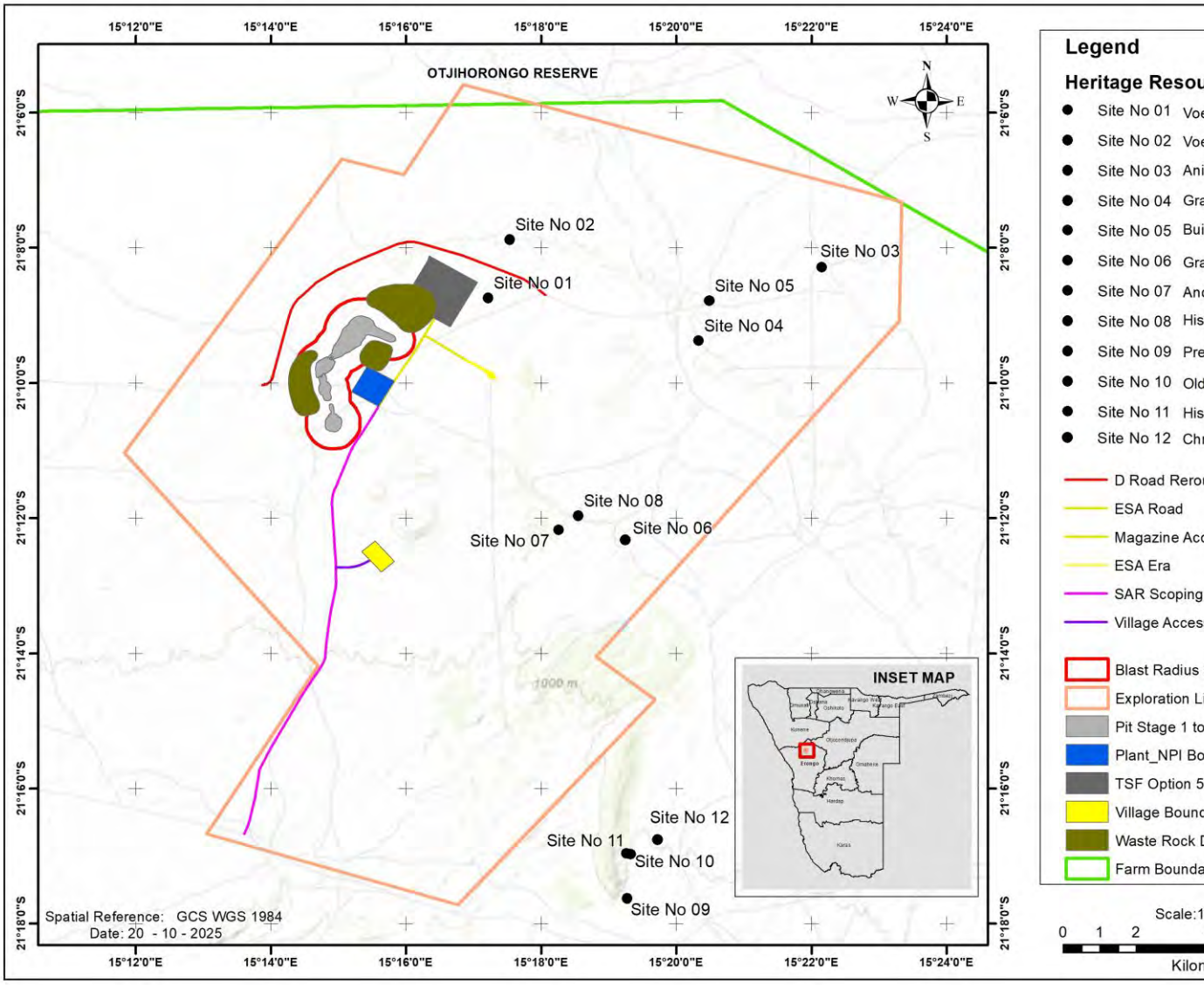


**Figure 11** and **Table 1**). These comprised of eight (8) sites that fall directly within the proposed EPL 4818. Of those eight, three (3) are historic water sources (**Figure 13** and **Figure 14** at least one (1) cemetery containing 20 unmarked graves (**Figure 15**); one (1) built ruin (**Figure 17**); at least one (1) Christian grave containing 4 unmarked graves (**Figure 19**); an additional (1) historic gravesite containing 30 graves (**Figure 21**) and one (1) historic well (**Figure 23**).

Furthermore, an additional four (4) heritage sites have been recorded during field surveys in the immediate surroundings of the project footprint. These comprised of one (1) prehistoric rock art site (**Figure 25**) one (1) historic mining shaft (**Figure 27**) one (1) old mining ruins (**Figure 29**), and *one* (1) Christian grave site containing two graves (**Figure 31**). These sites are reflected in **Table 4** below in which their impact assessment have been defined in terms of their vulnerability and significance with mitigation measures devised, which is further discussed in section 0.

*Table 4:Present the list of potential archaeological sites and historic heritage resources within and around the proposed project.*

| GPS Coordinates | Site No | Description | Local name | Distance from the proposed EPL 4818 | Vulnerability | Significance Rating | Recommendation |
|---|---|---|---|---|---|---|---|
| 21° 8'44.26"S 15°17'12.78"E | Site 01 | Historic Water Pool | Voer Te Koop Granite Oasis 01 | Within | 4 | 2 | Avoid or mitigate |
| 21° 7'52.38"S 15°17'32.17"E | Site 02 | Historic Water Pool | Voer Te Koop Granite Oasis 02 | Within | 4 | 2 | Avoid or mitigate |
| 21° 8'16.97"S 15°22'9.17"E | Site 03 | Historic Water Pool | Aniswept Granite Oasis | Within | 0 | 3 | Avoid or mitigate |
| 21° 9'22.25"S 15°20'19.86"E | Site 04 | Cemetery with 20 unmarked graves | Graveyard at Aniswept | Within | 4 | 5 | No-Go Zone or /Exhume, Relocate and Rebury |
| 21° 8'46.78"S 15°20'29.18"E | Site 05 | Built Ruin | Old Building in ruins at Aniswept | Within | 4 | 1 | Avoid |
| 21°12'19.17"S 15°19'14.42"E | Site 06 | Christian Graves with 4 unmarked graves | Hamas village gravesite | Within | 2 | 5 | No-Go Zone or /Exhume, Relocate and Rebury |
| 21°12'10.26"S 15°18'15.47"E | Site 07 | Historic Graves containing 30 graves | Hamas Village second gravesite (ancient) | Within | 4 | 5 | No-Go Zone or /Exhume, Relocate and Rebury |
| 21°11'57.63"S 15°18'32.84"E | Site 08 | Historic Well | Water Well at Hamas | Within | 2 | 5 | No-Go Zone |
| 21°17'37.40"S 15°19'16.46"E | Site 09 | Prehistoric Rock Art | Bushman Rock Art | 3.25 km from EPL | 0 | 5 | No-Go Zone and No further mitigations required |
| 21°16'57.43"S 15°19'15.58"E | Site 10 | Historic Mine Shaft | Historic Mine | 1 km from EPL | 0 | 3 | No-Go Zone and No further mitigations required |
| 21°16'58.37"S 15°19'19.24"E | Site 11 | Built Ruins | Old mining Ruins | 1.23km from EPL | 0 | 3 | No-Go Zone and No further mitigations required |
| 21°16'45.20"S 15°19'43.01"E | Site 12 | Christian Graves | Local Graves | 1.45km from EPL | 0 | 5 | No-Go Zone and No further mitigations required |

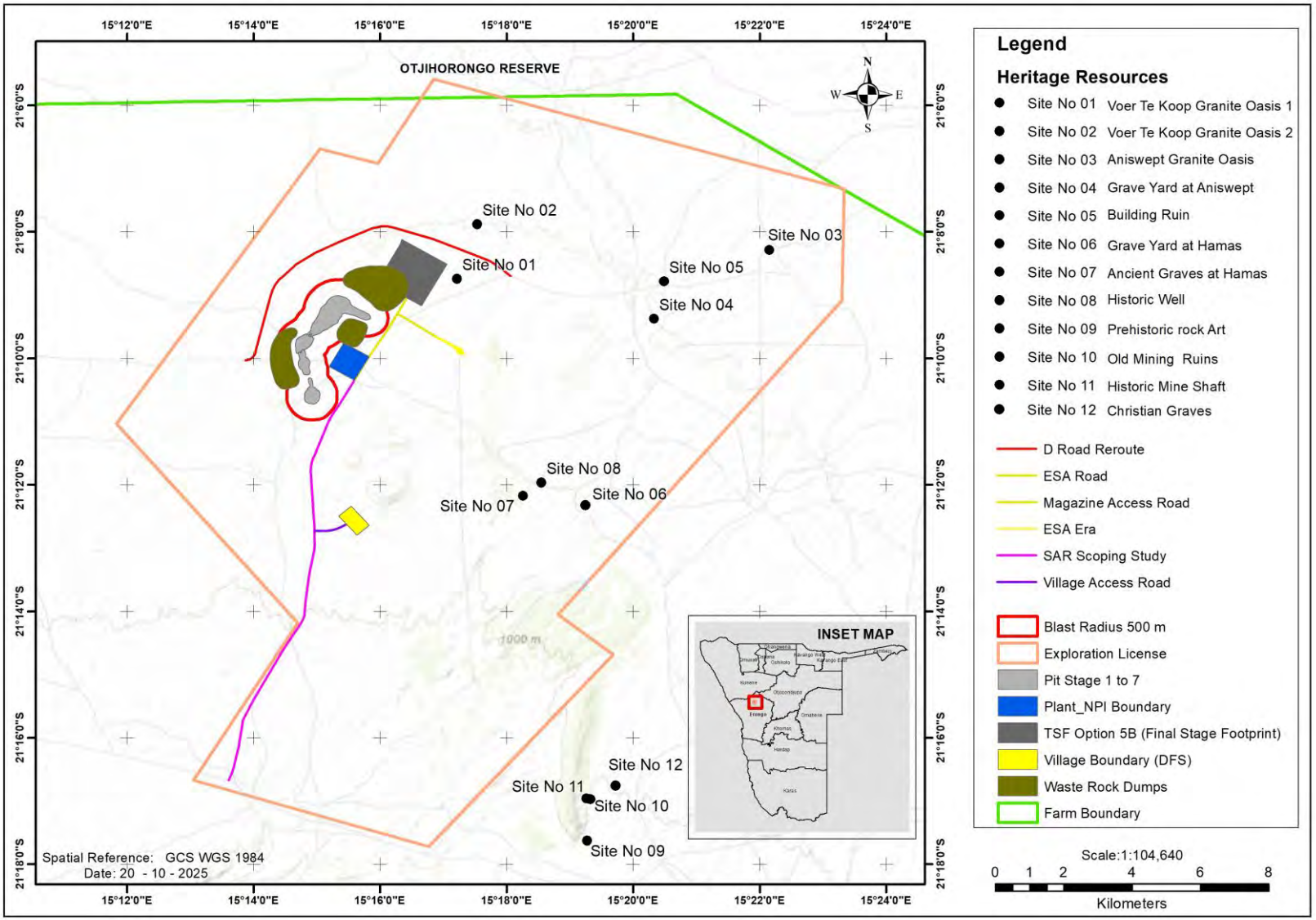


***Figure 11**:A topographic map indicating the distribution of heritage features recorded within and immediate surrounding of the EPL 4818. Cartographer: (Maria Sigopi at RCHS, June 2025)*

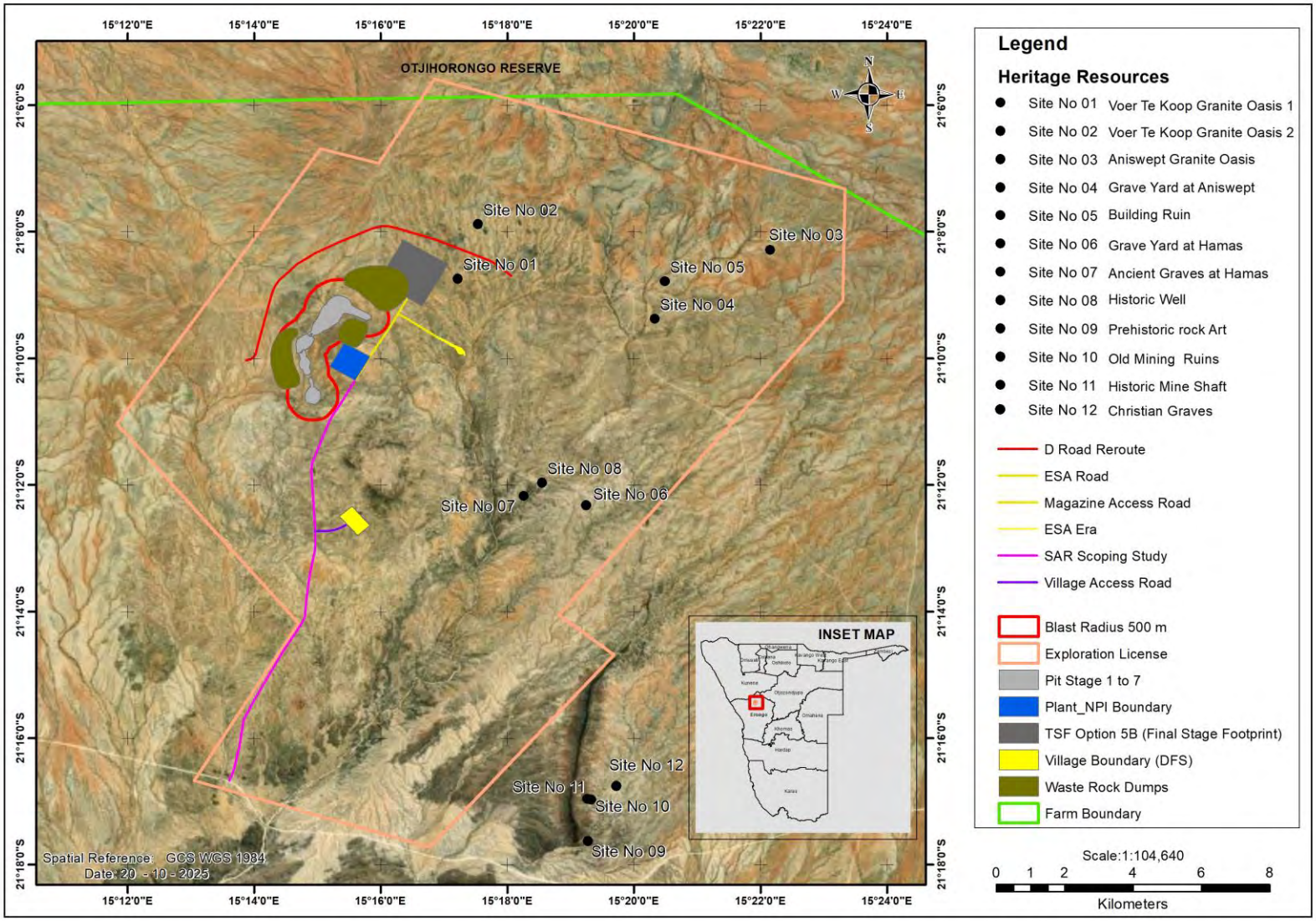


***Figure 12**: A satellite map of distribution of heritage resources in relation to the proposed Kokoseb Gold Mine Project Plan. Cartographer: (Maria Sigopi at RCHS, June 2025).*

Site 01-03 are key water sources identified by the local community and are locally known as Voer Te Koop Granite Oasis 01, Voer Te Koop Granite Oasis 02, and Aniswept Granite Oasis 03 (**Figure 13** and **Figure 15**). The granite intrusions containing these locales have multiple depressions that retain and keep water for extended periods after rainy seasons. These water pools are regarded as sacred places by the local communities since they sustain water for both humans and animals, especially in an environment that is dry and where water is a critical resource. Over the last phase of the Late Stone Age period, roughly over 1,000 years ago, aridity of the Namib desert increased, which translated to a shortage of critical resources such as water and food (Kinahan 1991). This had a severe implication for the hunting and gathering as well as pastoral societies and forced people and animals to migrate into affluent areas such as the mountains, where water and food were readily available. This is also a period that corresponds to an abrupt abandonment of rock art tradition in the 19th century by the hunters and gatherers, especially in the plains, to an increasingly herding lifestyle when pastoralists moved into the region in search of good grazing and reliable water sources. Natural water sources such as river courses, lakes, oasis, ponds, and pools became sacred places in the landscape, especially for groups of people that remained as well as herders' society.

As tension and competition over water sources increased, such places were guarded and kept under surveillance at various vantage points. Therefore, these sites may have functioned as resource bases, strategic locales for hunting and gathering where animals were likely ambushed at water points during the dry periods, and a complex set of communication routes where religious and ritual activities were likely practiced as people were forced to congregate near these locales. It is for these reasons that these water pools are still viewed as sacred places by the local communities, as their livestock and themselves continue to depend on them, hence worth preserving.

***Figure 13**: Three water pooling at Voer Te Koop Granite Oasis 01 (left), Voer Te Koop Granite Oasis 02 (middle) and Aniswept Granite Oasis (right) that have been identified by the local communities as sacred sites. Granite rock outcrop with natural crater like depressions holds and keeps water for extended periods after the rainy season, the crater is thus natural oasis for livestock, wildlife and humans. Source: (RCHs, 2024i).*

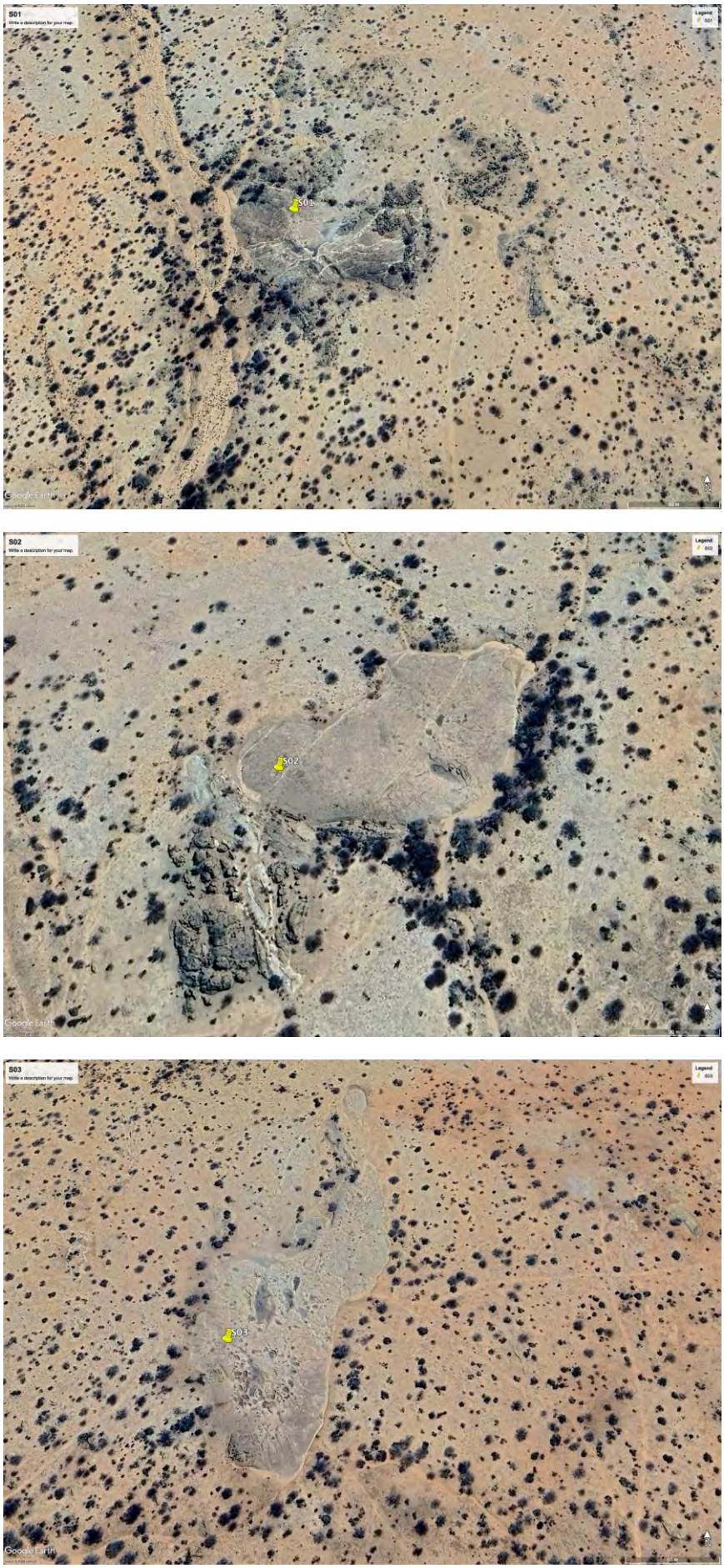


***Figure 14****: Above image is that of S01, middle image of S02 and bottom image of S03. Credits: Google Earth, 2025.*

Site 04 is locally referred to as the potential ancient cemetery by the local community and contains at least 20 unmarked graves or burial cairns (**Figure 15** and **Figure 16**) on Farm Aniswept. They are circular graves made out of loose limestone and diabase rocks on a flat gravel plain surrounded by a cleared area with hills on one side. The cairns do not bear any headstones or steles but are clearly in primary context. They are in close proximity to Site 07, where at least 30 graves have been recorded as well. The local community indicated that the site has been used for the past 100 years and is now abandoned as the community members migrated to either Uis or Okombahe and other areas due to severe drought experienced in this area. The site is well preserved; however, it might likely be vulnerable to the proposed mining operation as the mining resource pit and associated infrastructure is identified in its immediate surrounding area.

***Figure 15****: The environmental setting of the Site 04 belonging to an ancient burial cairn. Images Credit: (RCHS, 2024i).*

***Figure 16:*** *A Google Map of Site 04 indicating the physical features of the site on the ground. Image Credits: Google Earth, 2025.*

Site 05 (**Figure 17** and **Figure 18**) is an abandoned building or ruin at Farm Aniswept made from local stones held together with a special kind of local sand used as mortar. The ruin is less significant in terms of the National Heritage Act (27 of 2004), as they only signify past occupation of the area.

***Figure 17**: Left and right is an abandoned ruin at Aniswept. Images Credit: (RCHS, 2024i).*

***Figure 18**:A Google map indicating the location of the Site 05 on the ground. Image Credits: Google Earth, 2025.*

Site 06 **(Figure 19**) is locally known as Christian Graves by the community within Farm Hamas. They are unmarked graves bearing no headstones or stele but surprisingly regarded as Christian graves by the

Hamas community. The gravesite contains at least four graves of individuals buried on a flat gravel plain near thorn bush. According to the local community, the last grave was dug in 1983, but individuals buried are not known. They are all circular graves made out of loose calcrete surrounded by small thorn bushes. They are also in primary context, and no evidence of disturbances have been observed. The graves fall within the jurisdiction of the Burial Places Ordinance (27 of 1966) in terms of the Local Authorities Act (No. 23 of 1992). Due to the limited time in the field, it is imperative that further field research is required to identify their families, identities, and possible dates of burials so that one could establish whether they might be over 50 years old as per the National Heritage Act (27 of 2004).

***Figure 19****:Site 06 is a gravesite containing four identifiable graves. Images Credit: (RCHS, 2024i).*

***Figure 20***:*Site 06 is a burial cairn containing at least 4 buried individuals. Images Credit: (RCHS, 2024i).*

Site 07 (**Figure 21** and **Figure 22**) is a graveyard at Aniswept village. Here, at least more than 30 graves are in a well fenced-in enclosure containing both marked and unmarked graves. The site is in primary context, and no disturbances have been observed. According to the local community, the cemetery has been used for at least the past 50 years to date. It's located on a sandy and flat topography within the communal land. The site is located a few km from the Site 04 ancient cemetery within Farm Hamas.

***Figure 21****:Site 07 is the fenced in graveyard at Aniswept within EPL 4818. Images Credit: (RCHS, 2024i).*

***Figure 22**: Google Image indicating the location of Site 07. Image Credits; Google Earth, 2025.*

Site 08 (**Figure 23** and **Figure 24**) located in Hamas village was identified by the local community as a sacred historical waterpoint that was dug in 1957, as per its inscription, to mitigate water problems linked to severe drought experienced in the village at the time. The Well sits in a riverbed characterised by calcrete deposits. It supplies water to domestic animals and is still utilised by the community as drinking water. The local community expressed their fear of the EPL 4818 for its potential in draining critical water resources for mining purposes which will negatively impact the survival of the community hence, they have called for its protection.

***Figure 23****: Above and below images shows Site 08, a historic well within EPL 4818. Images Credit: (RCHS, 2024i).*

***Figure 24****: Is the Google Earth Image indicating the physical location of Site 08. Image Credits: Google Earth, 2025.*

Site 09 (**Figure 25** and **Figure 26**) is a rock art site located on the edge of the basalt ridge, with an elevation of 980 m above sea level, in the vicinity of the C35 road to Uis. Nankela (2020) describe the site as: 'accessible by a vehicle through the edge of a basalt outcrop overlooking the flat plains. The site hosting the artworks is a large yellowish rock shelter resting at the foot of the hill overlooking the valley.

The site hosts about ten (10) slightly visible painted anthropomorphic and zoomorphic figures in red pigment. The painting has been executed in various fine-line techniques, typical of hunter-gatherer traditions. Some have been fully painted with their interiors fully infilled, while others are partially infilled. Among the recognisable animal figures are antelopes, such as springboks, and giraffes. Human figures depict mainly hunters, bearing hunting equipment (bows and arrows) in various scenes. Associated archaeology includes surface scatter of flakes, fragments of pottery, and ashy sedimentations beneath the site to attest to its use and function. The artworks are relatively small in morphology, measuring between 11cmx9cm; 12cmx4cm; 13cmx8cm; 10cmx6cm in length and width. Further examination reveal that the site was heavily painted, but most of the artworks have immensely faded possibly as a result of long-sun exposure, exfoliation, erosion, wind and rainwater runoff caused by the site's orientation to the east as well as dust accumulation.

***Figure 25**: Prehistoric paintings on a granite outcrop outside the EPL 4818. (Nankela 2020 [left image] and RCHS, 2024i [right image]).*

***Figure 26:*** *Google Earth Image indicating the location of Site 09 in the landscape. Source: Google Earth Image, 2025.*

Site 10 (**Figure 27** and **Figure 28**) is an abandoned historic mine shaft whose history is not well-known among the locals. The mine shaft is linked to the settlements that were established in the context of the 19th century during the German colonial period but soon abandoned as Germany lost Namibia as a colony to the Allied Forces. According to the local community, this area then became a pastoral trade post but later became a communal labour reserve during the early twentieth century. The mine shaft is linked to Sites 11 and 12, believed to be a historic mining settlement where mine workers likely lived due to the typology of abandoned infrastructure at the site. The mine shaft was visited by Nankela (2020) with the assistance of the local community, and nothing was found to be stored in it.

***Figure 27 Above*** *image is the exterior entrance of the abandoned Site 10 Mine Shaft while the bottom image shows the interior entrance of the Mine. Phots Credit: (Nankela 2020).*

***Figure 28:*** *Google Earth Image showing the location of Site 010 in the landscape. Source: Google Earth, 2025.*

Site 11 (**Figure 29** and **Figure 30**) is an abandoned historic settlement comprising of at least four old ruins constructed with local stones and cement. It was linked to the historic mining activities associated with the mine shaft. It is believed that the local community lived here but soon abandoned the area as a result of severe droughts experienced during the 1980s and early 1990s and a poorly implemented national water policy, which decimated cattle numbers throughout the region, with Okombahe being one of the hardest hit areas (Rohde, 1997). What remains today in the area are some isolated ruins, a number of surfaces finds of colonial bottle glass and related debris discarded at rubbish dumps.

***Figure 29****: Images shows an example of clusters of ruins at Site linked to the mining development in the area. Photos Credits: (Nankela 2020).*

***Figure 30:*** *A cluster of about 6 ruins around the mine shaft of Site 011. Image Source; Google Earth, 2025.*

Site 12 (**Figure 31** and **Figure 32**) is a fenced-in graveyard containing at least two Christian graves belonging to the local community members who apparently worked for the German farmers who lived in the settlement identified as Site 11. Some of the ruins recorded at Site 11 were apparently old houses occupied by a German farmer after the mine closure, which were then later occupied by the local communities. The graves are well preserved and appear to have been well looked after by the family, according to the local community, who frequently cleans them.

***Figure 31**:Site 12 includes two Christian graves belonging to the local community member buried at an old mine. Photos Credits: (Nankela 2020).*

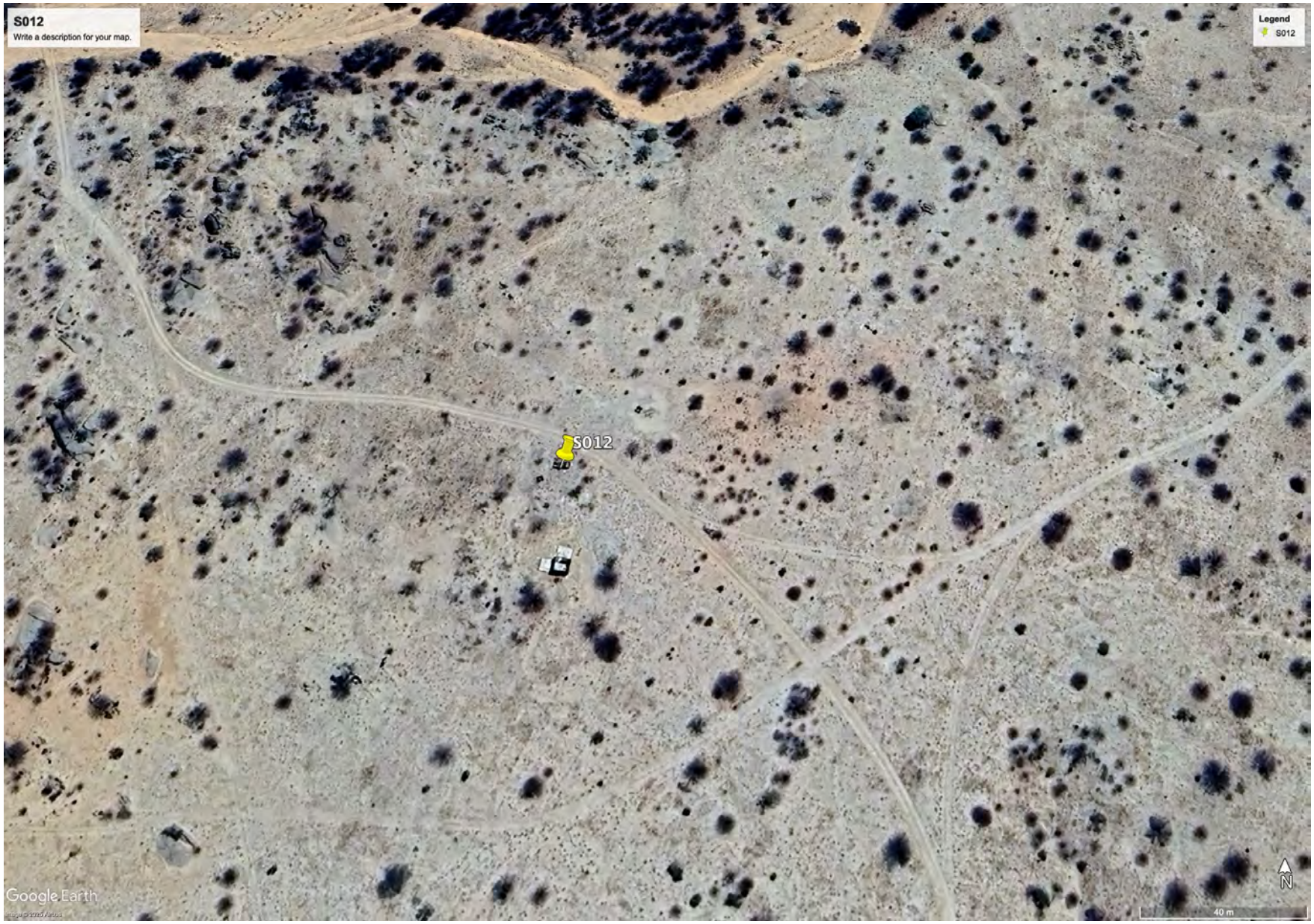


***Figure 32:*** *The landscape setting of Site 12 in close proximity to the ruins around the historic Mineshaft. Image credits: Google Earth, 2025*

## 10. IMPACT ASSESSMENTS AND MITIGATION MEASURES

IMPACT ASSESSMENT

The nature of anticipated impacts on heritage resources associated with the Kokoseb Gold project includes direct and indirect impacts to all the sites located within the proposed project. The direct impacts will be caused by the earthmoving and related works, while the indirect impacts may likely result from a potential increase in soil erosion at some sites following plant cover removal for the creation of tracks and construction of access tracks and roads where existing tracks cannot be utilised for the fleet of vehicles and other related infrastructure during the construction and operational phases. Consequently, without mitigation, the severity of these impacts is expected to be high, especially to the burial/cemetery sites. The duration of such impacts would be permanent, thereby receiving a high rating. Burial disturbances are a very sensitive matter; therefore, devised mitigation measures can reduce the rating to low.

MITIGATION MEASURES

(a) In the case of the historic water sources S01, S02, S03 and S08, these resources have a heritage significance ranking of 2, 3 and 4 and are within undisturbed natural settings but without diagnostic or associated heritage. However, their vulnerability rating is rated low (0) and 4 (high) due to the fact their distances to the proposed infrastructure development vary between 500 m (S01) from TSF, to 880 m from the proposed D Road reroute (S02) and 7 km from the proposed D Road reroute (S03), as well as a 4 km distance from the proposed magazine area (S08). Therefore, the proponent is implored to avoid disturbing and encroaching into them. In the unlikely event that it is not possible to do so, it is recommended that these affected communities and their livestock should be provided with a clean, reliable and portable water source, subject to the community consultations and approvals.

(b) In relation to Site 04, Site 06 and Site 07, the restricted time in the field did not allow further research in an effort to identify the families of buried individuals or possible biographies and/or identities of the individuals buried. The graves are linked to the communities on Aniswept, Hamas and Katora Farms and other probable surrounding areas. These communities have indicated that the graves have been used for the past 50 to 100 years. They therefore legally fall under the jurisdictions of the National Heritage Act (27 of 2004) and the Burial Places Ordinance

(27 of 1966). The graves all have a significance rating of 5 and are subsequently relevant in terms of Section 1(a) of the National Heritage Act (No. 27 of 2004) and the Burial Places Ordinance (27 of 1966) in terms of the Local Authorities Act (No. 23 of 1992) and regulated by the Cemetery Regulations (No. 4291, Government Gazette, July 13, 2009). Their vulnerability rating varies between 2 and 3 ratios due to their proximities ranging between 720 m, 800 m and 6 km, respectively, from the proposed D Road, DFS – part of the mining infrastructure. This implies that in the unlikelihood that the devised mitigation measures are not implemented, the sites would likely be indirectly impacted by the movement of vehicles and/or construction workers around the proposed D Road site or area clearing/preparation/construction as it falls directly within the EPL 4818. It is therefore recommended that the gravesites be fenced off with a 1.2 m metal mesh wire fence affixed to metal posts with a concrete foundation, and an entry gate and a lock be provided to the custodian of the cemeteries, i.e., the headmen or any trusted member of the affected communities. Signboards written 'graves protected under the National Heritage Act (No. 27 of 2004)' and 'Burial Places Ordinance (27 of 1966)' should be affixed to the gates of the fences. Designated buffer zones of 10 m, 20 m, 50 m and 100 m radius are to be made in the form of no-go signages from the gravesites to the proposed infrastructure development to avoid any possible encroachment and/or unintentional disturbance. Contractors working within the mine project and all associated infrastructures should be sensitized and made aware of these sites and the fact that under the National Heritage Act, 2004 (Act No. 27 of 2004), any items protected under the definition of heritage found in the course of development should not be altered, removed, and/or damaged but reported to the National Heritage Council.

(c) In the case of Site 05 at Aniswept, the site is considered to have very low significance in terms of the National Heritage Act (No. 27 of 2004) with a rating below 1. Therefore, its documentation during the field survey is sufficient. The ruin is linked to the recent occupation of this area, and its abandonment serves only as a testimony to the stone architecture of the area. In the unlikelihood that it cannot be avoided, then it may be destroyed, but that decision ought to be made by the National Heritage Council.

(d) With regards to Site 09, Site 10, Site 11 and Site 12, they are all located outside the EPL 4818, with distances ranging between 3.25 km, 1.11 km, 1.43 km and 1.68 km from the limit of the EPL. Consequently, they are not directly vulnerable to the proposed project. However, caution must still be exercised because they are significant terms of the National Heritage Act (No. 27 of 2004). Therefore, they should be designated as and treated as 'no-go zones. Contractors who will be working in the vicinity of EPL 4818 boundaries should be made aware of these sites to avoid any possible encroachments during all phases of the project development. Nonetheless, they do not require further mitigation; hence, the Chance Find Procedure appended to this report should be implemented.

## 11. SPECIFIC RECOMMENDATION

The following recommendations have been proposed from the identified impacts:

a) The gravesites reported here should be fenced, and the area within cleared of all encroaching bush, while their localities and that of other heritage features should be indicated on the project GIS and all relevant field mapping should be made known to all contractors whose activities might encroach on the sites.

b) In the event the proposed Kokoseb Gold Project activities will unavoidably encroach on the gravesites, the proponent is legally obliged to take all necessary steps either to protect the sites or engage an archaeologist consultant to consider further research in an effort to exhume, relocate and rebury in accordance with official directives from the National Heritage Council of Namibia and the Ministry of Urban and Rural Development under which the Burial Places Ordinance (27 of 1966) in terms of the Local Authorities Act (No. 23 of 1992) would fall under while following the Cemetery Regulations (No. 4291, Government Gazette, 13 July 2009).

c) Due to the very low significance of Site 05 and the fact that it falls directly within the proposed Kokoseb project, the site might likely be destroyed in the unlikelihood that it cannot be avoided as recommended, but the final decision ought to be made by the National Heritage Council.

d) The proponent is implored to incorporate the GIS data of the SE heritage resources in their sensitivity mapping of the project layout so that all flagged sites can be demarcated or avoided as a management measure to prevent any possible encroachment and disturbance. Heritage data should be sensitised to the operators and fieldwork personnel to exercise due caution when working in close proximity to where the heritage features are found.

e) The proponent is to submit this HIA report to the competent authority, the National Heritage Council of Namibia, in an effort to secure a Heritage Consent to enable further field survey and assessment (Phase II) to take place, especially in the unlikely event that some of the grave sites fall directly within the resource pit and EPL 4818 associated infrastructure.

## 12. SUMMARY AND CONCLUSION

The heritage resources recorded during this field survey within and immediate surrounding of the proposed Kokoseb gold project, are all features of different ages or cultural affinities. For instance, the

prehistoric rock art is evidence of earlier occupation attributed to the regional pattern in the spread of hunting and gathering communities who represent significant concentration and occupation of archaeological sites in the iconic mountains of Erongo and Brandberg, and associated outcrops of various geological settings. These remains are dated mostly over the last 6,000 years before present until the tradition was discontinued in the last millennial (Lenssen-Erz and Nankela 2020). It is therefore important to emphasize that there is no historical continuity between this archaeological feature and the present communities in the project area.

Grave features recorded within the project also differ and may represent different ages rather than cultural affinities. There are those identified as possible Pre-Christian graves that are exemplified by the use of circular grave cairns with/without upright stele and found mostly in isolation, as well as the conventional Christian graves in the form of low oblong mounds or build with concrete cement with a single upright headstone occurring in orderly cemeteries. Both of these features remain earlier and recent historic settlements of the different ethnic groups of displaced Damara-speaking communities who moved into this area earlier and in the late 1960s, with an onset of Christianity in Namibia, these remnants represent historical continuity between the colonial period and present communities in the project area. The use of other features such as natural water poolings and a Well can be attributed to both hunting-gathering as well as herding community attesting the use of landscape as a strategic resource base that supports its inhabitants. It is therefore important that these features are protected although they have varied degrees of heritage significances.

## 13. APPENDIX 1: CHANCE FIND PROCEDURE

The chance find procedure covers actions to be taken from the discovery of a heritage site or item to its investigation and assessment by a trained archaeologist or other appropriately qualified person. The chance find procedure intends to ensure compliance with the relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 ("a person who discovers any archaeological object must as soon as practicable report the discovery to the Council"). The procedure for reporting set out below, developed by Kinahan (2021) and replicated hereto, is to be observed.

**RESPONSIBILITIES**

| | |
|---|---|
| Operator: | To exercise due caution if archaeological remains are found. |
| Foreman: | To secure site and advise management timeously. |
| Superintendent: | To determine a safe working boundary and request inspection. |
| Archaeologist: | To inspect, identify, advise management, and recover remains. |

**PROCEDURE**

Action by person identifying archaeological or heritage material:

- If operating machinery or equipment, stop work.
- Identify the site with flag tape.
- Determine GPS position if possible.
- Report findings to foreman.

Action by **Foreman:**

a) Report findings, site location and actions taken to superintendent.
b) Cease any works in immediate vicinity. Action by superintendent.
c) Visit site and determine whether work can proceed without damage to findings.
d) Determine and mark exclusion boundary.
e) Site location and details to be added to GIS for field confirmation by archaeologist.

Action by **Superintendent:**

1. Visit the site and determine whether work can proceed without damage to findings.
2. Determine and mark exclusion boundaries.
3. Site location and details to be added to Archaeological Heritage Geographical Information System (GIS) for field confirmation by archaeologist.

Action by **Archaeologist:**

a) Inspect site and confirm addition to GIS.
b) Advise NHC and request written permission to remove findings from work area.
c) Recovery, packaging, and labelling of findings for transfer to National Museum

In the event of discovering human remains:

d) Actions as above.
e) Field inspection by archaeologist to confirm that remains are human.
f) Advise and liaise with NHC and Police.
g) Recovery of remains and removal to National Museum or National Forensic Laboratory, as directed.

## 14. APPENDIX 2: COMMUNITY MEMBERS ENGAGED

**Ms. Vallery Eibes**: contact 081-249-9558. One of the affected members of Katora village; her parent's village is right at the site where the gold mine resource pit is scheduled to commence.

**Ms. Juliane Engelbrecht**: community member living at Heins village within the boundaries of the Mining licence.

**Mr. Gurirab**: Okombahe community member. Contact No: 081-773-2335 and email: ghragerson@gmail.com

**Mr. Diego**: 081-770-5249. From Hamas who is employed as a Casual Labourer at Damaran Exploration (Pty) Ltd.

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