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5th November 2022

SPECIALIST REPORT TO THE PROPOSED EXHUMATION, RELOCATION AND REBURIALS
OF GRAVES ON FARM OKAWAYO No. 46 IN KARIBIB DISTRICT, ERONGO REGION.

PREPARED FOR:

Environmental Compliance Consultancy (ECC)

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QUALIFICATIONS AND EXPERTISE OF THE CONSULTANT

NAME	Dr Alma Nankela
RESPONSIBILITY ON THE PROJECT	Supplementary Report for the archaeological assessment of the Osino Project, Erongo Region, Namibia for the Environmental Compliance Consultancy (ECC), Quaternary Research Services, 23 february 2021.
QUALIFICATIONS	PhDs & Masters Degrees in Quaternary and Prehistory as well as Bachelor Degree in History and Geography.
PROFESSIONAL REGISTRATION	Association of Southern African Professional Archaeologists (ASAPA); Namibia Scientific Society (NSS); The Society of Africanist Archaeologists (SafA) and the International Council on Monuments and Sites (ICOMOS).
EXPERIENCE IN YEARS	14+
EXPERIENCE	Dr Nankela worked as an archaeologist and heritage specialist at the National Heritage Council of Namibia for more than a decade. She has conducted extensive archaeological research across Namibia, developed archaeological policies and operational guidelines; carried out heritage management and conservation work at various UNESCO and national heritage sites in Namibia.
HERITAGE PERMIT NO.	02/2022
REPORTING REQUIREMENT	National Guidelines for Heritage Impact Assessment in Namibia, National Heritage Council of Namibia (2021).

FAMILY CONSENT STATEMENT

We, the !Auxab family have read and understood the content of this report and confirm that as a family our wish to have our deceased family's graves acknowledged and recorded as heritage artefacts of value has been fulfilled. The family further recognizes and agree to the proposed exhumation, relocation and reburial process recommended in this report according to accepted international best practice standards and relevant local regulations. The details of which will be finalized between ourselves and Osino Gold Exploration and Mining (Pty) Ltd and detailed in the rescue exhumation, relocation and reburial management plan before any disturbance to the graves are allowed.

.....
The !Auxab family (representative / chairman)
Signature

EXECUTIVE SUMMARY

Dr Alma Nankela (of RESEARCH CULTURE HERITAGE SERVICES cc) has been appointed by Environmental Compliance Consultancy (ECC) on behalf of Osino Gold Exploration and Mining (Pty) Ltd, to update an existing archaeology and heritage report by devising management guidelines for exhumation, relocation and reburials of four known graves at a site identified on along the western bank of the Okawayo River, a major tributary of the Khan River on Farm Okawayo No. 46 located in Karibib District in Erongo region. This is to enable the proponent to satisfy provisions of the National Heritage Act, (No 27 of 2004) and its Regulations (2005) as well as other By Laws. Although an archaeological field survey and assessment was carried out on the proposed mining project site by Dr John Kinahan early 2021, this grave site was likely unintentionally missed. Environmental Compliance Consultancy was made aware of the grave site by the living family of the deceased in mid 2022. Due to the high degree of threat, it is therefore indispensable to integrate the site into the existing ESIA reports as heritage remains to enable the process of rescue exhumation, relocation, and reburials to start since the graves will be impacted on by the proposed mining operations by the Osino mining project. Following recommendations from a consultative meeting held between the proponent, ECC and grave's family in Windhoek, on the 28th September 2022 at the National Heritage Council of Namibia, the parties agreed to conduct a joint site visit to locate and identify the grave and to engage further on acceptable and appropriate cultural procedures for exhumation, relocation, and reburial of the graves. It is for this reason that a site visit was conducted on the 17th of October 2022.

A total of four graves were noted, of which two are of adult individuals with one bearing a marked headstone with legible inscriptions whereas two are children (an infant and a toddler) as confirmed by the family members. The graves are older than 50 years of age and fall within the jurisdictions of the National Heritage Act of 2004 in which the National Heritage Council (the Competent Authority) need to consent to the practical mitigation measures since the graves will be impacted. In principle, it has been agreed that exhumation, relocation and reburial will be the best option therefore, the remains would require permission to be granted by an administrator under the Burial Places Ordinance (27 of 1966). This document therefore represents a draft specific and detailed heritage management plan for the graves required in exhumation, relocation and reburial in effort to fulfill the mitigation terms of the National Heritage Act, as well as the Environment Management Act.

INTRODUCTION AND BACKGROUND

The proposed Twin Hills Gold Project on Mining License 238 (ML 238) is located on farm Okawayo 46 in the Karibib District of the Erongo Region, Namibia. The current ML proceeded the EPLs 3739, 5658 and 6167 over the same area in which the Environmental Compliance Consultancy (ECC) had carried out the ESIA on behalf of the Proponent. The heritage component formed part and parcel of the required specialist studies to be considered in the overall EIA to fulfill requirements of the Environmental Management Act (No.7 of 2007) and its Regulations (Govt Notice No. 30 of 2012) as these guiding tools apply to the management of impacts on archaeological sites and remains.

Quaternary Research Services carried out an archaeological survey and assessment of the Project, identifying several important and sensitive sites, augmented by a brief field visit that assessed, inspected and verified several heritage features within and around the footprints of the project. This management report is therefore based primarily on the survey documentation and assumes that the project area was adequately covered; that archaeological features were correctly identified, and that the sensitivity of the sites were appropriately estimated on the basis of the available project data. A possible limitation of the field survey is that the local communities were likely not consulted as part of the wider local engagement while the western bank of the Okawayo River was unlikely surveyed possibly due to vegetation cover and or access challenge due to rainy season. However, the Quaternary Research survey included identified key sites and drew on local knowledge to augment the archaeological investigation. On the basis of "Chance Find Procedure" devised^[1], a site containing four Christian graves was brought to the attention of the ECC and a request was made by the deceased's family members to integrate it into the existing ESIA reports as heritage remains which prompted this supplementary mitigation report after a site visit on the 17th October 2022. The site visit confirmed that the affected landscape could have a long history of human occupation making it an active cultural landscape where there is a possibility of encountering previously unknown pre-Christian graves in the project area before and during subsurface construction work.

TERMS OF REFERENCE (TOR)

To supplement the objectives of the initial assessment, the study was commissioned as part of a Phase 2 Heritage Mitigation exercise for the proposed Twin Hills Gold Project in relation to the proposed grave rescue exhumation, relocation and reburial mitigation process. Therefore, the assessment sought to:

- a) Confirm the existence of the affected graves site within the proposed mining development footprint;
- b) Conduct a site visit and condition survey of the gravesite in the primary footprint impact zone;
- c) Make further recommendations on mitigation measures with the view to reduce specific adverse impacts and enhance specific positive impacts on the affected burial sites;

- d) Update the existing heritage report that conforms to the National Heritage Act, 2004 (Act No 27 of 2004) and other key Regulations concerning the management of remains as a heritage resource;
- e) Formulate pre-mitigation guidance for the potential impact (s) to these graves due for exhumation, relocation and reburials;
- f) With the assistance of the family members of the deceased, to identify individuals buried in each grave and propose the relocation of new burial ground to a municipal cemetery or area outside the footprint of the Project; and
- g) Develop a rescue exhumation, relocation and reburial management plan which will detail the project schedule.

LEGISLATIVE REQUIREMENTS

In Namibia, the regulatory authority for the identification, protection, preservation, management, and promotion of Namibia's heritage resources is the National Heritage Act, (No. 27 of 2004). Reference to human remains in the Act is under *Section 1* which defines it as 'archaeological' material, which includes "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". Although no heritage management plan framework exists under this legislation in respect to human remains from other contexts other than archaeological, the Act makes provision for archaeological impact assessment of large developmental projects such as this. Therefore, a specific and detailed heritage management plan for the grave site is required to fulfill the mitigation terms of the National Heritage Act, as well as the Environment Management Act.

Since the practical mitigation for the grave site has been preliminary decided upon (pending a written Consent/Permission from the living descendants), the next step required in the management of the site is to devise pre-mitigation guidance for before, during and after to be followed in the rescue exhumation, relocation and reburials which requires consent from the National Heritage Council. The heritage consent will further facilitate permissions (a Court Order or Magistrate Approval) to be granted under the Burial Places Ordinance (27 of 1966) in terms of the Local Authorities Act, (No 23 of 1992) and the Magistrates Act, (No. 3 of 2003) to which the exhumation, relocation, and reburial of graves must conform to the standards set out. Therefore, both exhumation, relocation and reburial exercises will follow protocols of these legislations including that of Cemetery Regulations, (No. 4291, Government Gazette 13 July 2009) to which the appointed funeral undertaker will adopt. Moreover, the World Archaeological Congress (WAC) has set international ethical standards for the treatment of human remains. In 1989 the WAC Inter-Congress in South Dakota (USA) adopted the Vermillion Accord on Archaeological Ethics and the Treatment of the Dead.

Permission must also be granted from the living descendants for exhumation and reburial while assistance might be requested from the Health Department in the Ministry of Health and Social Services (MOHSS) in providing grief or trauma counseling throughout the exhumation and reburial process to the family. Furthermore, assistance might be sought from the local police (if necessary) to keep law and order while consultation and permission from the landowners and Town Council (i.e. where the graves are located and where they ought to be relocated to) before exhumation must be made. It is advised that the human remains only be handled by a trained archaeologist and a registered undertaker and/or as permitted by the administrator or superintendent in terms of Burial Places Ordinance of 1966 and Cemetery Regulations of 2009.

METHODOLOGY

This archaeological management and mitigation report followed a basic process of evaluation. The results of the Archaeological Heritage Impact Assessments by Quaternary Research Services supplemented by the historic report undertaken by ECC in the area have provided adequate baseline information to the Project and the graves identified and recorded in the area under discussion followed by an assessment based on the field visit observations. Additional data such as GPS and Google Earth images of the area, provided the location of the area and graves site for georeferencing. Photographs of the area and sites, as well as each individual grave have also been taken as part of the documentation process (see **Figures 1,3 and 4**). Additional information pertaining to the biological data of buried individuals are reflected in the Grave Assessment Form (Appendix 1) for each individual buried. The form was partially completed on site with additional information to be provided by the living family to complete as discussed during the joint site visit (**Figure 1**). Basic information such as names of the deceased, age at death, cause of death, surface features, grave measurement, general settings, threats, grave goods, general preservation and other general observations are included on these forms. These completed forms will not be reproduced in this report once completed by the family while the information on the burials will be summarized and interpreted at the end (after reburial). The forms will however be submitted to NHC to archive for future reference if required. Photographs of all the burials will be provided.

Archaeologically, investigations related to the exhumation of graves from various contexts follows a number of guidance which are complementary to this document. These cover various aspects of the treatment of human remains including: excavation (McKinley & Roberts, 1993; Nienaber and Steyn, 1999); post-excavation assessment and analysis in fieldwork projects (Brickley & McKinley, 2004); archaeological fieldwork projects in burial grounds and more practical guidelines from the World Archaeological Congress (WAC) and the Vermillion Accord on Archaeological Ethics and the Treatment of the Dead has set international ethical standards for the treatment of human remains. In Namibia, protocols for exhumation of graves follow guidance of Cemetery Regulations of 2009, especially Part V. These will therefore be complemented by the methodological toolkit for exhuming graves in archaeological salvage operations. In many cases, time is always a limiting factor as the recovery process is a meticulous operation that prioritizes documentation and remains in their respective positions, however sufficient time is still required. The following excavation techniques are some of the widely acceptable methods that will be adopted in this exercise:

1. Warning signs near the site should be erected within less than 25m of the road to the site. Where existing tracks or roads are adjacent to the sites these should be individually assessed for mitigation, and where it is practical to deviate from the site this should be done as a matter of course. These precautions will ensure that the sites are adequately protected while mitigation work is carried out;
2. A bright barricade tape is required to seal the grave site/ acts as a minor impediment to prevent accidental entrance to that site or situation and enhances general safety;
3. Adequate workspace around the grave site/ exposed remains will be properly demarcated and provided;
4. All observations regarding construction, grave materials and characteristics of the surface features will be documented (photographic recording of site context, plan view and section, site plan drawing and detailed description before preparing the site for exhumations;
5. After the removal of the surface features, the extent of the burial pit will need to be ascertained through extensive test trenching while observing possible differences in the

matrix/stratigraphy. After the indications of the presence and characteristics of the burial pit, it needs to be documented, the in-fill will be excavated to expose the human remains and associated cultural materials. To prevent any damage; the test-trench approach will employ at least a narrow trench (25-30 cm wide), excavated with a trowel to a depth of between 15 and 20 cm in the lower part of the burial pit. This area to be chosen is (LxL) since it is most likely that the femurs of the skeleton occur in this part of the grave;

6. The graves will then be exhumed by hand using picks and shovels and with photographic documentations while taking field notes. The matrix surrounding the remains will be carefully screened to retrieve any possible cultural artefacts associated with the burial. This process will be repeated until indications of the presence of human remains are observed. The exhumation will aim at recovering all the remains and minimise damage, record the three-dimensional context of the remains and to preserve and respect the dignity of the buried individual;
7. As soon as human remains are encountered, care will be taken to leave as much of the skeleton as possible covered in order to protect the remains from damage by excavation and to preserve the integrity of the context of the skeletal elements and possible associated cultural remains. The extent and characteristics of the burial pit will then now be documented *in situ* and the workspace must be assessed and enlarged if not sufficient;
8. The remains will then be removed, placed in coffins, described and documented *in situ*. Where possible soil samples might be taken for reburial as a standard practice. In this case, with permission from the living families or persons affiliated to the graves attending;
9. In the likely event that there are other specific guidelines for the actual exhumation that the specialists and funeral undertaker need to consider, the living families or persons affiliated to the graves also need to provide cultural heritage guidance before the exhumation process starts.

FAMILY CEREMONY AND RITUALS

The next of kin of the deceased will be provided with the opportunities to pay tribute, perform family ceremonies or rituals before and after exhumations as recommended in Article 3 of the Vermillion Accord on Human Remains. These activities are private affairs therefore they do not need to be documented.

RELOCATION

The remains will be placed in coffins and then be safely transported in a hearse (s) depending on the size of this vehicle. The designated new burial grounds should preferably be located in a cemetery situated outside the footprint of the Project. The living family will need to choose the new burial location.

REBURIAL PROTOCOLS

All protocols related to the reburial will follow the guidance of the Cemetery Regulations, (No. 4291, Government Gazette 13 July 2009), especially Part III.

ASSUMPTIONS AND LIMITATIONS

The brief field visit located the grave site. However, the comprehensiveness of this field visit was only confined to this site and thus it is necessary to realize that other potential heritage resources were not assessed at this stage. As such, the grave site does not necessarily represent all the possible heritage resources likely present within and surrounding the project area.

This study was restricted to physically identifiable graves. This means superficially unidentifiable graves and burial grounds, i.e. those covered by vegetation or have no visible signature or unknown are not accounted for herein. As such, should any burial/grave site or any protected heritage objects not included in the present inventory be located or observed at a time of this report, an additional survey must be commissioned immediately before the exhumation process. This is the case of a potential burial cairn observed immediately west of the present site (**Figure 5**). Such a located potential heritage feature may not be disturbed or removed in any way until such time that an archaeologist has been able to make an evaluation as to the significance of the burial site in question. In the event that any graves or burial places are located during the mining operation, the procedures and requirements pertaining to graves and burials will apply.



Figure 1: The living descendants (left) of the buried individuals at the grave site. Image Credits: (RCHS, October 2022).

BASELINE RESEARCH

The exhumation, relocation and reburial of burial grounds and graves has become a common practice during infrastructure development, such as roads, dams and town expansion globally. However, most probably the largest amount of grave and cemetery relocations is associated with mining development. In South Africa for instance, A bird eye view of the South African Heritage Resources Information System (SAHRiS) has revealed an increase in the total of heritage permit applications for grave relocations from 2015 and 2022 most of which are related to mining developments. However, the situation is not the same in Namibia as the heritage registry does not reflect a single record of a permit nor consent issued in relation to these processes as the Namibian Heritage Act regards human remains from the archaeological contexts.

The general physiography of the Project has been extensively described by Kinahan¹. However, the graves site located at (GPS coordinates: Lat: 21°50'14.00"S; Long: 15°58'45.00"E) at the elevation of 1210m (**Figure 2, 3 and 4**) is located on the western bank of the Okawayo River, a major tributary of the Khan River. The landscape is characterized by open and dense woodland while sitting on a dolomitic marble ridge. According to (Kinahan 2021), the ovaHerero and other pastoralist groups might have likely herded their livestock here between the 16th and 17th centuries AD as evidenced by pasture sites until colonial settlers arrived with the onset of the 19th century in which commercial farms were established. Subsequently, farm Okawayo might have had several farm owners over the last century and some of the farm laborers/tenants who may have lived on this farm were likely buried there. However, to reconstruct the history, inputs from the living family will be of utmost importance.



Figure 2: Google-Earth Map showing the location of the grave site on the Farm Okawayo.

¹ Kinahan John (2021). Archaeological assessment of the Osino Project, Erongo Region, Namibia for the Environmental Compliance Consultancy (ECC), Quaternary Research Services, 23 february 2021.



Figure 3: Landscape setting of the grave site on the Farm Okawayo. Image Credit: (RCHS, October 2022).



Figure 4: Above is a panoramic view of the graves all together. Below are close up images of individual graves buried at the site. Image credits: (RCHS, October 2022).

OBSERVATIONS

According to the geospatial data supplied by ECC and as confirmed during the joint site visit, the grave site falls directly within the footprint of the project hence the degree of threat is HIGH. This rescue exhumation and reburial will be a time consuming exercise during all stages and it's an expensive process. Therefore post burial activity such as erecting a suitable memorial in one of the cemeteries in town also needs to be considered. Whichever option is to be considered, adequate time should be allocated in the design schedule (**Table 2**). The grave site is a family plot/lot in a cluster approximately 7m in diameter and facing 262° West and surrounded by cut off vegetation enclosure. Here, at least four (4) graves comprising two adults and two children (an infant and a toddler) are buried in juxtaposition to each other. Three of the burials are cairns with one modern grave constructed with cement bearing a headstone that has a legible inscription that reads "GO DFA ND IDE !A UXASB25.01.DOD OKAVAJO" (see **Figure 6**) and is adorned with a Christian cross flanked by two seemingly engraved tree leaves. The gold pipe covering the headstone is affixed to a piece of wood whose meaning is not known. Both adult burials are placed on the left (east) while two small graves on the northwest). The cairns are covered with loose semi-circular arrangement of what appear to be limestone rocks/mound on the edge and partially infilled with loose sandy gravel and loose stones. All these cairns do not bear any headstone or stele but are still in primary contexts. Biological data are still missing and these will be identified with the assistance of the living family. The overall summary is reflected in Table 1 below.

Table 1: Summary of preliminary findings.

Grave No.	Age Group	Measurements	Typology	Grave Cover
RCHS G001	Adult	L=1.38m W=40cm	Cairn	The grave had an oval shaped mound of packed loose stones as dressing. The dressing was elongated and was slightly raised. The dressing is orientated west.
RCHS G002	Adult	L=1.2m W=40cm	Gravestone	A rectangular Christian grave constructed with cement, ledger and a legible inscribed headstone.
RCHS G003	Toddler	L=92cm W=38cm	Cairn	Loose semi-circular arrangement of lime stones (?) on the edge of the cairn infilled with sandy gravel with neatly packed loose stones towards the centre.
RCHS G004	Infant	L=50cm W=32cm	Cairn	Loose semi-circular arrangement of lime stones (?) on the edge of the cairn infilled with sandy gravel with neatly packed loose stones in the centre.

AUTHORIZATION PROCESS

The administrative process for the application to exhume, relocate and reburial of graves in Namibia applies to different legislations and regulations administered by different Government Offices. It is expected that the process will likely be fraught with knowledge gaps in the implementation of the sets of legislations. This is the case in most local councils where an application for exhumation is handled the first time. Very few officials have been involved in such applications, and the handling and conclusion of such an application can be daunting. The authorisation and permitting process

envisaged for this project should therefore allocate sufficient time to provide the optimal authorisation and permitting process for this exercise as reflected in (**Table 2.**)



Figure 5: A potential burial cairn possibly of an adult individual covered with isolated loose rocks and vegetation. The feature consists of a oval shaped mound, slightly elevated off the ground to approximately 0.5m. Image credit: (RCHS, October 2022).



Figure 6: A Christian grave at the site indicating delicate details of the headstone. Image credit: (RCHS, October 2022).

Table 2: Preliminary design schedule

Phase	Organization	Responsibilities (Logistics)	Timeline	Estimated Cost
1	ECC	- Finalize the HIA with inputs from the deceased family; - Engage and request a written letter of support from the deceased Family; - Submit HIA supplementary report and apply for the heritage Consent from the NHC; - Apply and obtain a Court Order or Magistrate Approval under the Burial Places Ordinance (27 of 1966) from the Karibib Town Council as per the Local Authorities Act, (No 23 of 1992) and or from the Karibib Magistrate in terms of the Magistrates Act, (No. 3 of 2003); - Engage and retain an approved funeral undertaker to provide services (coffins, transport etc.) for exhumation, relocation and reburial; - Engage the living family if they wish to be provided with trauma counseling from MOHSS during exhumation; - Appoint an archaeologist; - Engage all other relevant stakeholders not listed here.	3 Months or Less	Real costs
	NHC	- Issue a Heritage Permit/Consent to The Proponent in line with relevant provisions of the National Heritage Act No. 27 of 2004; - Involvement in the rescue mission for monitoring purposes.	2 Months or Less	Permit / Consent Fee

2	ECC	- Secure all authorisations from State agencies (NHC, MOHSS, Magistrate, Namibian Police {if required}, the Town Council etc.) and written support from the family; - Engage the family with all details concerning: (decisions on tombstones and inscriptions, dresses for the deceased {if required} coffins, cemetery location, rituals, prayers and or ceremonies, list of invited guests, transport and or lodging?, grave offerings, dedicated budget for family and roles they wish to play during all three stages of process; - Engage and apply for reservation of grave space in a new cemetery for reburial in line with Section 16 of the Cemetery Regulation of 2009; - Engage the funeral undertaker to prepare the new burial grounds in a cemetery in line with Sections 22, 23 and 24 of the Cemetery Regulation of 2009; - Finalize the program, and prepare all logistics i.e. transport, catering, lodging? etc.; and - Set a dedicated budget for the entire process.	1 Month or Less	Real costs
3	ECC	- Actual date of exhumation and relocation of four graves ● Team (ACC, Family, GRN agencies, archaeologist, professional funeral undertaker, etc). - Reburial time or as permitted by the “Administrator” or “Magistrate” in terms of Local Authorities Act, (No 23 of 1992) and Magistrate in terms of the Magistrates Act, (No. 3 of 2003) respectively. - Memorial Tombstones may be erected. However, section 49 of the Cemetery Regulations of 2009 especially should be observed.	At least 2 days or less	Real costs

SPECIFIC RECOMMENDATIONS

The following specific recommendations are proposed as guidelines for the Rescue, Exhumation, Relocation, and Reburial of the Farm Okawayo Graves:

1. It has been established that the graves need to be exhumed and reburied outside the footprint of the project area, due to the degree of imminent threat. The graves are not of scientific value. Therefore the exhumation methodology applicable will be for the Funeral Undertaker to follow strict Guidelines set out in the Cemetery Regulations, (No. 4291, Government Gazette 13 July 2009). However, archaeological methodologies will be applied by the appointed archaeologist to complete the report in line with the standards devised.
2. The living family should provide a consent letter to the Proponent authorizing the exhumation, relocation, and reburial which must be submitted along with the final report to NHC;
3. The Proponent and ECC should engage the living family on the choice of action regarding the new location of the reburial area/ cemetery;
4. ECC and the Proponent should allow reasonably adequate time for the authorisation process and implementation of mitigations;
5. Scrupulously adhere to all agreed mitigation methodologies, including proper demarcation of sites, deviation of roads, etc;
6. A comprehensive field survey along the Okawayo River tributary is urgently required to ensure that all potential graves and burial grounds are correctly identified, accurately recorded, and rescued before mining operations.

I hope you will find this report and its recommendations satisfactory.

Yours sincerely,

Alma Nankela, PhDs, MAs and BeD
Archaeologist

REFERENCES

- 1) Brickley, M and McKinley, J (eds) (2004). Guidelines to the Standards for the Recording of Human Remains. Reading: British Association for Biological Anthropology and Osteoarchaeology/Institute of Field Archaeologists.
- 2) English Heritage, (2005). Guidance for Best Practice for Treatment of Human Remains Excavated From Christian Burial Grounds in England. Accessed on: <https://altogetherarchaeology.org/PDF-links/Treatment%20of%20Human%20Remains%20Excavated%20From%20Christian%20Burial%20Grounds.pdf> and retrieved on the 4th November 2022.
- 3) Kinahan John (2021). Archaeological assessment of the Osino Project, Erongo Region, Namibia for the Environmental Compliance Consultancy (ECC), Quaternary Research Services, 23 february 2021. Quaternary Research Services, 23 february 2021.
- 4) Kinahan John (2011). Heritage Management Plan for the Construction Phase of the Neckartal Dam, Karas Region, Namibia on behalf of Knight Piésold (Pty) Ltd Consulting Engineers & Environmental Scientists, Windhoek, Job No QRS 135.
- 5) Hester, T.R. et.al. (1975). A Guide to Field Methods in Archaeology. Palo Alto.
- 6) Joukowsky, M. 1980. A Complete Manual of Field Archaeology. Engelwood Cliffs.
- 7) McKinley, J I and Roberts, C (1993). Excavation and Post-Excavation Treatment of Cremated and Inhumed Human Remains (Institute of Field Archaeologists Technical Paper 13). Reading: Institute of Field Archaeologists
- 8) Nienaber, W.C. and Steyn, M. (1999). Exhumation and Analysis of the Remains of a Black Native Participant in the Anglo-Boer War (1899-1902), KwaZulu-Natal. South African Journal of Culture History. 13(2):94-110.
- 9) Nienaber, W.C. 1997). Exhumation and Reinterment of Burgher C.G. Naude. South African Journal of Culture History. 11(1):123-133.
- 10) World Archaeological Congress (1989). 'The Vermillion Accord – Human Remains: Motion Approved at the First Inter-Congress on the Disposal of the Dead', Vermillion, SD, August 1989 (reproduced in Historic Scotland 1997, 21)
- 11) World Archaeological Congress. (1989). Vermillion Accord on Archaeological Ethics and the Treatment of the Dead. Lothair. Found at: <https://www.goodreads.com/book/show/844190> Lothair Consulted March 2019.



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ASSESSMENT FILE N° _____

DATE: _____

GRAVES ASSESSMENT FORM FOR EXHUMATION, RELOCATION AND REBURIAL

Administration information

Farm Name:	_____
Magisterial District and Region:	_____
Nearest Town:	_____
Farm Owners:	_____
Period of occupancy (years):	_____
Legal Status: Declared ☐ Not declared ☐	
GRN Gazette Number:	_____
Farm size (<i>if known</i>):	_____
Postal Address:	_____
Contact Details:	_____
Emails:	_____
Farm Economic Activities:	_____

Description of individual graves

Grave No:	
Name of deceased:	
Age at death:	
Date of death:	
New grave number:	
Current location of grave: (GPS)	
Surface features of grave: (Kerbing- concrete, railing etc.,)	
Grave goods:	
Measurements of Grave:	
Grave topping: (Coarse aggregate gravel, marble blocks & ceramic flowers, blocks labels etc.)	
Base of headstone (Construction materials)	
Lettering/Inscription (Letter head/photos)	
General setting/planting:	
Conservation Status:	
Threats:	
Conservation Recommendation:	
Proposed relocation area description: (GPS, m/km from previous site/physical setting/altitude etc.	

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Description of individual graves

Grave No:	
Name of deceased:	
Age at death:	
Date of death:	
New grave number:	
Current location of grave: (GPS)	
Surface features of grave: (Kerbing- concrete, railing etc.,)	
Grave goods:	
Measurements of Grave:	
Grave topping: (Coarse aggregate gravel, marble blocks & ceramic flowers, blocks labels etc.)	
Base of headstone (Construction materials)	
Lettering/Inscription (Letter head/photos)	
General setting/planting:	
Conservation Status:	
Threats:	
Conservation Recommendation:	

Proposed relocation area description: (GPS, m/km from previous site/physical setting/altitude etc.	
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Description of individual graves

Grave No:	
Name of deceased:	
Age at death:	
Date of death:	
New grave number:	
Current location of grave: (GPS)	
Surface features of grave: (Kerbing- concrete, railing etc.,)	
Grave goods:	
Measurements of Grave:	
Grave topping: (Coarse aggregate gravel, marble blocks & ceramic flowers, blocks labels etc.)	
Base of headstone (Construction materials)	
Lettering/Inscription (Letter head/photos)	
General setting/planting:	
Conservation Status:	
Threats:	
Conservation Recommendation:	

Proposed relocation area description: (GPS, m/km from previous site/physical setting/altitude etc.)	

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Conservation Status:	
Threats:	
Conservation Recommendation:	

Proposed relocation area description: (GPS, m/km from previous site/physical setting/altitude etc.	