

**DESKTOP ARCHAEOLOGICAL AND CULTURAL IMPACT
ASSESSMENT REPORT FOR EXPLORATION ACTIVITIES ON EXCLUSIVE PROSPECTING LICENSE
8791.
ERONGO REGION**



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October 2025

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DECLARATION

We hereby declare that we do:

1. Have knowledge of and experience in conducting archaeological assessment, including knowledge of Namibian legislation, specifically the National Heritage Act (27 of 2004), as well as regulations and guidelines that have relevance to the proposed activity;
2. Perform the work relating to the application objectively, even if this results in views and findings that are no favourable to the applicant;
3. Comply with the aforementioned Act, relevant regulations, guidelines, and other applicable laws. We also declare that we have no interest or involvement in:
 - (i) the financial or other affairs of either the applicant or his consultant; and
 - (ii) the decision-making structures of the National Heritage Council of Namibia.

Signed by:

Dr E.S.Mowa

Key Concepts and Terms

Periodisation: Archaeologists divide the different cultural epochs according to the dominant material finds for the different time periods. This periodisation is usually region-specific, such that the same label can have different dates for different areas. This makes it important to clarify and declare the periodisation of the area one is studying.

These periods are nothing a little more than convenient time brackets because their terminal and commencement are not absolute and there are several instances of overlap. In the present study, relevant archaeological periods are given below;

Early Stone Age (~ 2.6 million to 250 000 years ago)

Middle Stone Age (~ 250 000 to 40-25 000 years ago)

Later Stone Age (~ 40-25 000, to recently, 100 years ago)

Early Iron Age (~ AD 200 to 1000)

Late Iron Age (~ AD1100-1840)

Historic (~ AD 1840 to 1950, but a Historic building is classified as over 60 years old)

Definitions Just like periodisation, it is also critical to define key terms employed in this study. Most of these terms derive from Namibian National Heritage legislation and its ancillary laws, as well as international regulations and norms of best-practice. The following aspects have a direct bearing on the investigation and the resulting report.

Cultural (heritage) resources are all non-physical and physical human-made occurrences and natural features that are associated with human activity. These can be singular or in groups and include significant sites, structures, features, Eco facts and artefacts of importance associated with the history, architecture or archaeology of human development.

Cultural significance is determined by utilising aesthetic, historic, scientific, social or spiritual values for past, present or future generations.

Value is related to concepts such as worth, merit, attraction or appeal, concepts that are associated with the (current) usefulness and condition of a place or an object. Although significance and value are not mutually exclusive, in some cases the place may have a high level of significance but a lower level of value. Often, the evaluation of any feature is based on a combination or balance between the two.

Isolated finds are occurrences of artefacts or other remains that are not in situ or are located apart from archaeological sites. Although these are noted and recorded, but do not usually

constitute the core of an impact assessment, unless if they have intrinsic cultural significance and value.

In-situ refers to material culture and surrounding deposits in their original location and context, for example, an archaeological site that has not been disturbed by farming.

Archaeological sites/materials are remains or traces of human activity that are in a state of disuse and are in, or on, land and which are older than 100 years, including artefacts, human and hominid remains, and artificial features and structures. According to the Namibia National Heritage Act (NNHA) (Act No. 27 of 2004), no archaeological artefact, assemblage or settlement (site) and no historical building or structure older than 60 years may be altered, moved or destroyed without the necessary authorisation from the National Heritage Council or a provincial heritage resources authority.

Historic materials are remains resulting from human activities, which are younger than 100 years, but no longer in use, including artefacts, human remains and artificial features and structures.

Chance finds means archaeological artefacts, features, structures or historical remains accidentally found during development.

A grave is a place of interment (variably referred to as burial) and includes the contents, headstone or another marker of such a place, and any other structure on or associated with such place. A grave may occur in isolation or in association with others where it is referred to as being situated in a cemetery (contemporary) or burial ground (historic).

A site is a distinct spatial cluster of artefacts, structures, and organic and environmental remains, as residues of past human activity.

Heritage Impact Assessment (HIA) refers to the process of identifying, predicting and assessing the potential positive and negative cultural, social, economic and biophysical impacts of any proposed project, which requires authorisation of permission by law and which may significantly affect the cultural and natural heritage resources. Accordingly, an HIA must include recommendations for appropriate mitigation measures for minimising or circumventing negative impacts, measures enhancing the positive aspects of the proposal and heritage management and monitoring measures.

The impact is the positive or negative effects on cultural heritage.

Mitigation is the implementation of practical measures to reduce and circumvent adverse impacts on heritage or enhance the beneficial impacts of an action.

Mining heritage sites refer to old, abandoned mining activities, underground or on the surface, which may date from the pre-historical, historical or the relatively recent past.

Study area or 'project area' refers to the area where the developer wants to focus its development activities (refer to plan).

Phase I studies refers to surveys using various sources of data and limited field walking to establish the presence of all possible types of heritage resources in any given area.

Acronyms

Table 1; Acronyms and Definitions table

Abbreviation/Acronyms	Description/Definition
AIA	Archaeological Impact Assessment
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
HIA	Heritage Impact Assessment
LIA	Late Iron Age
NHA	Nation Heritage Act, Act 27 of 2004
SM	Site Manager
NHCN	National Heritage Council of Namibia
ESA	Later Stone Age
EPL	Exclusive Prospecting Licence
ECC	Environmental Clearance Certificate
CFP	Chance Find Procedure
EMA	Environmental Management Act No.7 of 2007
ML	Mining licence

SUMMARY

A combined field survey and desktop-based Heritage Impact Assessment was conducted for the proposed exploration activities on EPL 8791. The assessment took into account that earlier exploration efforts had already taken place within the EPL area, which may have disturbed or destroyed any archaeological materials present on the surface. Nevertheless, apart from zones impacted by previous activities, the EPL was generally found to contain minimal archaeological material, as detailed in the findings. Most of the recorded archaeological sites and artifacts were located outside the boundaries of the EPL.

1. Introduction

ESM Archaeological and Heritage Consultants was sub-contracted by ECC Environmental Compliance Consultancy (Pty) Ltd to conduct a Heritage Impact Assessment for the proposed exploration activities on Exclusive Prospecting License 8791 located North-West of Usakos, Erongo Region, Namibia. The Exclusive Prospecting License is located on the west side of the Spitzkoppe Mountain Ranges.

This HIA study, therefore, serves as one of the baseline reports produced to assess the impacts of development on the sensitive heritage landscapes at a local and regional scale on the EPL. Consequently, it is expected that the devised mitigation measures will aim at preventing possible disturbances, alterations, damages, and the destruction of the sensitive heritage landscapes within the areas.

The main objective of this assignment is to conduct a HIA on the Exclusive Prospecting License (EPL) 8791. The assessment reported here is intended to identify existing desktop archaeological sites that could be affected by the exploration activities by Marenica Ventures Pty (Ltd). Archaeological assessment forms the basis of recommended management actions to avoid or reduce negative impacts, as part of the environmental assessment. In particular, the assessment addresses the following objectives:

1. The identification and assessment of potential impacts on archaeological/heritage resources arising from the prospecting activities.

2. The identification and demarcation of sensitive archaeological/heritage sites requiring special mitigation measures to eliminate, avoid, or compensate for possible destructive impacts.
3. Formulation and motivation of specific mitigation measures for Prospecting activities on EPL 8791.

2. Site description and location

The EPL 8791 lies in a remote, sparsely populated desert area northwest of Klein Spitzkoppe, within the #Gaingu Conservancy. The EPL coverage includes #Gaingu Conservancy and Farm Marencia.

The assessment team acknowledges that a narrow portion of EPL 8791 intersects the boundary of privately owned farmland (Farm Marencia). Due to accessibility issues , no assessment work was conducted on this section yet. However, this limitation does not present a significant heritage risk, as this section represents a marginal boundary zone and does not form a large part of the planned active exploration area at this stage. The proponent is however, advised to commit to engaging the landowner to obtain access prior to any future work in that area, and, if access is granted, a supplementary heritage walk-through assessment is recommended before any exploration activities commence at Farm Marencia. In addition, the project will implement a Chance Finds Procedure that will remain active across the entire EPL, including the farm boundary zone, ensuring compliance with the National Heritage Act (Act 27 of 2004). This approach ensures responsible project progression while maintaining heritage protection and stakeholder respect.

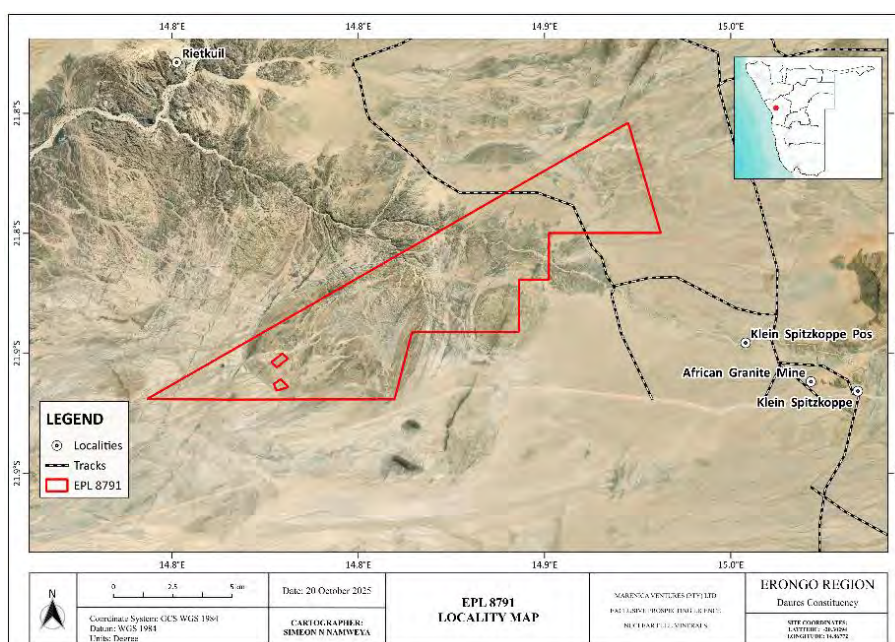


Figure 1: Locality map of the EPL 8791

Vegetation of Site



Figure 2: Vegetation type within the EPL

3. Assumptions and Limitations

This archaeological assessment relies on inference used to inform assessment harvested from heritage records from the National Heritage Council, archaeological GIS spatial data from reports, publications, and GIS data obtained from a series of research and records that have been substantially exposed during the last decades, by a series of detailed archaeological assessments carried out.

4. Legal requirement

The government of the Republic of Namibia enacted the National Heritage Act (No. 27 of 2004) as a legal instrument to provide for the protection of heritage resources. Heritage resources imply both sites and objects of archaeological, paleontological, and rare geological objects (including meteorites); ethnographical, historical (including military objects, historic graves, or sacred sites), shipwrecks; built monuments of significant architectural heritage, and objects of scientific interest. The developed operational guidance, the “Interim Guidelines for Heritage Consultants”¹ has been formulated to implement the National Heritage Act concerning archaeological assessment. Further, a critical provision of the Heritage Act is section 46, which “prohibits the locating, removal, damage, alteration or excavation of heritage sites or remains” defined in the Act as “any remains of human habitation or occupation that are 50 or more years old found on or beneath the surface”² without a heritage permit. Section 48 of the Act provides the procedure for the application and granting of permits that are required in the event of damage to a significant site occurring as an inevitable result of development, while Sections 53(7) and 55(8) of the Heritage Act relate to the application of a Consent for works and activities subject to an environmental impact assessment. Moreover, archaeological impact assessment of mineral exploration is included in the category of “any other development or activity that may change the character of an area of land” as outlined in section 54 (6) of the National Heritage Act, which needs to be subjected to a HIA.

Another relevant legal instrument where the archaeological impact assessment in Namibia is required is the Environmental Management Act, (No. 7 of 2007), whose definition of “anthropogenic elements” is intricately included in the “environment’ definition. Consequently, the list of activities that may not be undertaken without an Environmental Clearance Certificate applies to the management of impacts on archaeological sites and remains, whether these are considered in detail by the environmental assessment or not (Kinahan 2012). Internationally, appropriate operational guidelines include those from the World Bank OP/ BP 4.11 in respect of “Physical Cultural Resources” (R2006-0049, revised April 2013) and the World Heritage Convention (1972).

¹ Guidelines for Heritage Impact Assessment, National Heritage Council, September 2021.

² Part 1, Definitions 1 of the National Heritage Act, (No. 27 of 2004).

5. Methodology

The report was both field and desktop-based heritage impact assessment that was informed by a field survey of the proposed EPL and the use of both primary and secondary data sources to ensure a comprehensive understanding of the potential heritage context of the project area. The field survey involved a ground assessment of the EPL area, using non-invasive methods to observe heritage resources. In accordance with the Heritage Act of 2004, heritage resources include old buildings, artifacts over 50 years old, graves, and palaeontological or archaeological features such as rock art, caves, and stone tools. GPS devices were employed to record the geographic locations of identified features, while a camera and an archaeological photographic scale were used to document them visually. Moreover interviews with local community members, though outside the EPL were conducted to obtain the context of the heritage resources within the area surrounding the EPL. The desktop phase of the study mainly entailed an in-depth review and analysis of existing literature, records, and data concerning the archaeological and cultural context of EPL 8791. Secondary sources, including published archaeological reports, previous heritage assessments, academic studies, and government archives, were examined to identify any previously recorded heritage sites or culturally important features within or around the project area. Furthermore, literature focusing on the cultural practices, social structures, and economic activities of local communities on the island was carefully reviewed. This encompassed research on traditional land use, sacred sites, intangible cultural heritage (such as rituals, beliefs, and oral traditions), and the historical development and settlement patterns within EPL 8791. By employing this comprehensive approach, the study sought to contextualise the heritage sensitivity of the area and ensure that potential impacts of the proposed development on cultural and heritage assets were properly addressed. Table 2: Ranking scales for archaeological significance and vulnerability by (QRS, Kinahan 2012).

Significance Rating	Vulnerability Rating
0. No archaeological, paleontological and historic significance 1. Disturbed or secondary context, without diagnostic materials	0. Not Vulnerable 1. No threat posed by current or proposed development activities 2. Low or indirect threat from possible consequences of development (e.g. soil erosion);

2. Isolated minor find in undisturbed primary context, with diagnostic materials 3. Archaeological, paleontological & historical site (s) forming part of an identifiable local distribution or group 4. Multi-component site (s), or central site (s) with high research potential 5. Major archaeological, paleontological & historical site (s) containing unique evidence of high regional significances	3. Probable threat from inadvertent disturbance due to proximity of development 4. High likelihood of partial disturbance or destruction due to close proximity of development 5. Direct and certain threat of major disturbance or total destruction
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Table 2: Assessment criteria for the evaluation of cumulative impacts on archaeological sites developed by (QRS, Kinahan 2012).

CRITERIA	CATEGORY	DESCRIPTION
Extent or spatial influence of impact	National Regional Local	Within Namibia Within the Region On site or within 200m of the site impact
Magnitude of impact (at the indicated spatial scale)	High Medium Low Very Low Zero	Social and/or natural functions and/ or processes are severely altered Social and/or natural functions and/ or processes are notably altered Social and/or natural functions and/ or processes are slightly altered Social and/or natural functions and/ or processes are negligibly altered Social and/or natural functions and/ or processes remain unaltered
Duration of impact	Short Term Medium Term Long Term	Up to 3 years 4 to 10 years after construction More than 10 years after construction

6 Archaeological Setting

The Erongo Region is rich in archaeological sites and heritage resources, hosting numerous well-documented locations such as the Brandberg, Leopard's Cave, and the Petrified Forest.

Among these, the Brandberg Mountain National Area—currently under consideration as a potential UNESCO World Heritage Site, is a significant archaeological feature located within the regional boundaries of the proposed development area. Archaeological evidence indicates that the San communities, as well as Namibians at large, regard this mountain as a sacred site.

Situated at the base of the mountain in the Tsiseb Ravine lies the famous “White Lady” rock painting, the area’s main tourist attraction. The painting is located on a rock surface beneath a small overhang. The ravine itself contains over 1,000 rock shelters and more than 50,000 individual paintings.

In total, the Erongo Region hosts around 150 registered heritage sites and is particularly rich in both recent and Iron Age cultural remains. Furthermore, approximately 37 sites in the region are recognised as national monuments, as listed by the National Heritage Council of Namibia. The EEPL in question is located within the locale of Spitzkoppe.

The Spitzkoppe area, situated within Namibia’s Erongo Region, is an archaeologically and culturally significant landscape that preserves a rich record of Later Stone Age hunter-gatherer occupation associated with the San peoples. The granite inselbergs and rock shelters surrounding Spitzkoppe contain numerous rock art sites, primarily consisting of paintings depicting humans, animals, and composite figures that are interpreted within the context of San spiritual and shamanic traditions (Pager, 1989; Lewis-Williams & Dowson, 1989).

Stone artifacts such as microliths, scrapers, and backed tools, as well as shards of ochre and grinding stones, have also been found during archaeological excavations, suggesting subsistence processing and pigment manufacture (Clark, 1954; Kinahan, 1991). Mobile hunter-gatherer populations used the rock shelters of the Spitzkoppe and nearby Erongo Mountains as temporary residences because they provided hunting grounds, water access, and shelter in an otherwise parched environment (Becker, 2017).

9. Results and Observations

No archaeological or cultural heritage materials were recorded within the assessed boundaries of the EPL during the field assessment (*refer to figure 3*). The identified features within the EPL primarily consist of evidence from previous exploration activities, including drill holes and related surface disturbances. These features lack archaeological significance. Sites of cultural or historical value were mainly observed outside the EPL boundary, mainly in areas associated with past or existing community settlements.

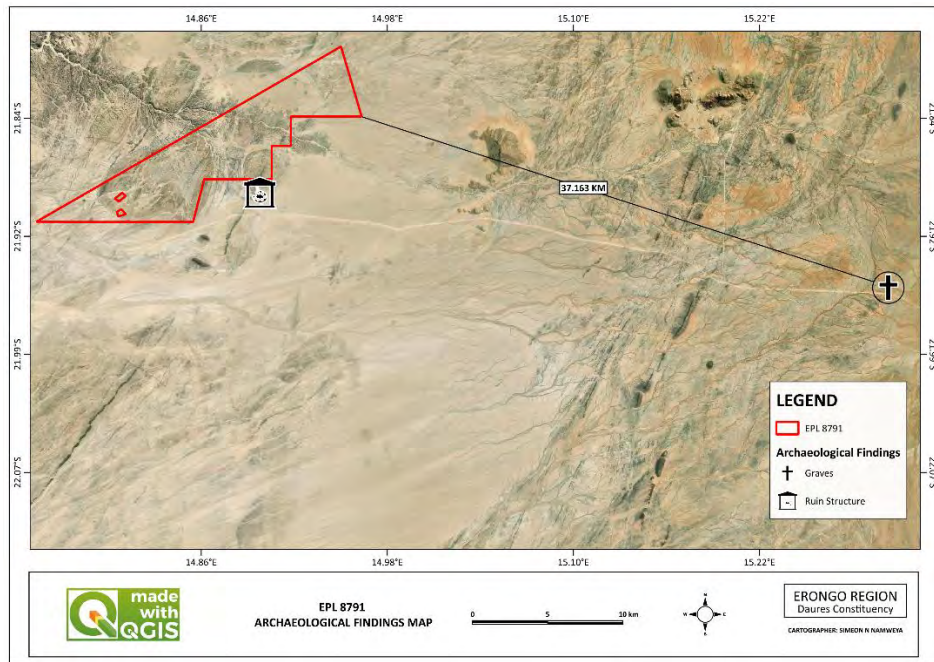


Figure 3: Map of archaeological findings identified during field assessment

Findings observed during field assessment:



Figure 4: Old ruin structure

Remains of a historical stone-built feature, most likely associated with colonial-era or early 20th-century pastoral epoch. Based on the unfinished structure one might suggest a utilitarian function such as a temporary dwelling, livestock enclosure, storage facility or outpost structure likely associated with early farming. However it is important to note the ruin structure was identified outside the EPL as observed in figure.



Figure 5: Family grave site

The above includes grave sites belonging to a family, located 37 km away from the EPL (*refer to figure 3*). Although a portion of the EPL falls within the #Gaingu Conservancy, where dispersed rural homesteads and small settlement clusters occur, increasing the possibility of encountering isolated grave sites or family burial areas commonly associated with traditional land use practices, it is important to emphasise that the EPL is located at a considerable distance from established settlements and known national heritage resources. The field survey confirmed that the proposed exploration area **does not** overlap with culturally sensitive habitation zones, communal areas, or documented grave sites. While the broader conservancy landscape may contain heritage features linked to ancestral traditions, the remote setting of the EPL significantly reduces the likelihood of direct impact. As a precautionary measure, the proponent is advised to implement a **Grave and Burial Site Mitigation Protocol** as part of the **Chance Finds Procedure**. In the event that a burial is uncovered, exploration activities will immediately cease in the vicinity of the finding, the area will be secured, and the National Heritage Council and relevant traditional authorities will be notified for guidance and appropriate management in line with the National Heritage Act (Act 27 of 2004). This approach ensures protection of cultural values while allowing the project to proceed responsibly.

9.1. Stakeholder Engagement

As part of the heritage assessment process, the consultant conducted informal consultations with members of the local community residing within the #Gaingu Conservancy. During these engagements, a local couple voluntarily guided the assessment team to a family grave site located within their settlement area. The graves, marked by simple stone alignments and tombstones, were confirmed by the community members to belong to their relatives who had passed away over several decades. The community representatives explained that such graves are typically found within or adjacent to homestead areas as part of local cultural practice, and they further emphasized that known burial sites are concentrated around existing settlements and not within the boundaries of EPL 8791. They also indicated that other cultural heritage resources, including rock art sites and ritual shelters, are primarily located in the Spitzkoppe mountain area, which is recognised locally as a place of cultural and historical importance. These consultations support the field survey findings and confirm that no heritage resources of concern were identified within the section of the EPL surveyed, while also highlighting the importance of continued engagement with residents to ensure the protection of culturally significant sites.

Table: Coordinates of Archaeological Findings.

Archaeological Findings	Coordinates
Grave site	21° 56' 55.9" S 15° 18' 11.4" E
Old Ruin Structure	21° 53' 18.6" S 14° 53' 51.8" E

This Heritage Impact Assessment has identified the likely existence of various heritage resources in the broader area surrounding EPL 8791. These include both tangible heritage, such as sacred sites, traditional landmarks, and places of cultural significance, and intangible heritage, including local cuisines, traditional dances, oral histories, and belief systems that form part of the community's cultural identity.

10. Management actions

Since the area designated for the proposed upgrade has already been extensively disturbed by the construction and long-term use of the existing aerodrome, it is unlikely that any significant heritage resources remain intact within the immediate project footprint, particularly the surface. Previous development activities likely displaced or destroyed most surface or near-surface cultural materials. It is critical to note that part of EPL 8791, which forms part of Farm Marencia, was not assessed due to accessibility challenges. As such issuance of consent need to take note of this aspect.

The potential for encountering buried or subsurface heritage resources, though low, cannot be completely dismissed. Therefore, as a precaution, all upgrade activities should be conducted with awareness of the possibility of uncovering unexpected buried heritage materials. Additionally, though heritage resources were found outside the EPL, the GPS coordinates of identified heritage resources have been provided to ensure that the proponent avoids disturbing these areas through access roads or related project infrastructure. We recommend a one kilometre radius as a buffer zone free from any access road or related project developments.

If any archaeological materials, human remains, or other heritage resources are unearthed during upgrade activities or ground-disturbing activities, all work in the affected area must be halted immediately. The discovery should then be reported to the relevant heritage authority without delay, and the **Chance Finds Procedure** outlined below must be followed to ensure that such findings are managed under national heritage legislation and best practice protocols.

1. Chance Finds Procedure (CFP) management guideline:

These assessments were desktop-based, and field surveys were carried out, therefore; significant subsurface heritage resources might be discovered in the course of upgrade activities. On-site personnel and contractors must be sensitized to recognize “chance finds heritage” in the course of their work. The procedure set out here covers the reporting and management of such finds. The CFP covers the actions to be taken from the discovery of a heritage site or object to its investigation and assessment by a trained archaeologist. The CFP is intended to ensure compliance with the relevant provisions of the National Heritage Act (27 of 2004), especially Section 55 (4): “a person who discovers any archaeological objects must as soon as possible report the discovery to the council”. The procedure of reporting set out below must be observed so that heritage materials are reported to the authorities.

A. Responsibilities:

Operator To exercise due caution if archaeological remains are found

Foreman To secure site and advise management timeously

Superintendent To determine safe working boundary and request inspection

Archaeologist To inspect, identify, advise management, and recover remain

B. Procedure:

Action by the person (operator) 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

C. Action by foreman:

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

D. Action by superintendent

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

E. Action by archaeologist

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

F. In the event of discovering human remains

- Actions as above;
- Field inspection by archaeologist to confirm that remains are human;
- Advise and liaise with NHC Guidelines; and
- Recovery of remains and removal to National Museum or National Forensic Laboratory, or as directed.

11. Conclusion

Based on the results of the archaeological field assessment, no archaeological or cultural heritage sites were identified within the assessed areas of EPL 8791. The surveyed area is largely characterised by disturbed and geologically exposed terrain with minimal evidence of past human occupation. The few archaeological sites observed during the assessment were located **outside** the EPL boundary, predominantly in areas associated with historical and contemporary settlements. This distribution pattern is consistent with regional settlement trends, as communities have historically established themselves near permanent water sources and habitable terrain situated **beyond** the EPL limits. Furthermore, the most archaeologically

significant sites in the broader area particularly rock art shelters and Later Stone Age occupational sites are concentrated around the **Spitzkoppe mountains**, which are known to represent a major cultural landscape of high heritage value due to the number of archaeological findings located within it. The project recognises the cultural value of the Spitzkoppe to descendant communities and Namibia's national heritage and is fully committed to implementing chance find procedures, consultation with the National Heritage Council, and heritage monitoring during ground disturbance activities.

In light of this, it is recommended that approval or consent for the proposed exploration activities to be granted, subject to it being confined to the surveyed area, excluding Farm Marenca, and also that the **Chance Find Procedure** is strictly implemented. This protocol ensures that if any unexpected heritage materials, human remains, or artefacts are encountered during exploration, appropriate steps will be taken to report the find, halt work in the area, and engage with the relevant heritage authorities for assessment and guidance in line with applicable heritage legislation.

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