
!Khomani Cultural Landscape (Republic of South Africa) No 1545

Official name as proposed by the State Party

!Khomani Cultural Landscape

Location

ZF Mgcawu District
Northern Cape Province
South Africa

Brief description

The !Khomani Cultural Landscape is located at the border with Botswana and Namibia in the northern part of the country. The nominated property comprises a vast area that coincides with the Kalahari Gemsbok National Park (KGNP). The large expanse of sand dunes and associated physical features contains evidence of human occupation from the Stone Age to the present and is said to be associated with the !Khomani San culture. The nominated landscape includes landmarks of San history, migration, livelihoods, memory and resources. It is said to attest to the adaptive responses and interaction of various San communities, past and present, to survive in a desert environment.

Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a *site*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (July 2015) paragraph 47, it is also a *cultural landscape*.

1 Basic data

Included in the Tentative List

15 May 2004

International Assistance from the World Heritage Fund for preparing the Nomination

None

Date received by the World Heritage Centre

1 February 2016

Background

This is a new nomination.

Consultations

ICOMOS has consulted its International Scientific Committee on Cultural Landscapes, and several independent experts.

Comments about the evaluation of this property were received from IUCN in November 2016. ICOMOS has carefully examined this information to arrive at its final decision and its March 2017 recommendation; IUCN also reviewed the presentation of its comments included in this ICOMOS report. IUCN's will include the full comments as provided to ICOMOS in its evaluation book 41COM.INF.8B2.

Technical Evaluation Mission

An ICOMOS evaluation mission visited the property from 2 to 8 October 2016. An IUCN expert accompanied the mission.

Additional information received by ICOMOS

ICOMOS sent a letter to the State Party on 14 October 2016 requesting additional information on the following points: further description of the nominated property, its features, processes and attributes illustrating a millennia-long human presence; distribution of San, !Khomani and other peoples in the wider region; rationale for the delineation of the boundaries; statutory regulatory frameworks for the planning system; cartographic and photographic documentation; results of cultural mapping exercise; working mechanisms of the management system; coordination of the existing management plans.

The State Party responded on 14 November 2016 and the information provided is integrated in the relevant sections of this report.

An Interim Report was sent by ICOMOS to the State Party on 18 January 2017

Date of ICOMOS approval of this report

10 March 2017

2 The property

Description

The nominated property comprises a vast area that coincides with the Kalahari Gemsbok National Park (KGNP), which is part of the vast Kgalagadi Transfrontier Park, straddling Botswana and South Africa.

It is a large desert area extending over the interior plateau of southern Africa and occupying most of Botswana, the eastern side of Namibia and the northern part of South Africa. It features sparse vegetation, occasional trees, and the dry riverbeds of the Nossob and Auob Rivers. Water flows underground and provides life for grasses and trees growing in the river beds.

The large expanse of sand dunes and associated physical features contains evidence of human occupation from the Stone Age to the present and is said to be associated with the !Khomani San culture. The nominated landscape includes landmarks of San history, migration, livelihoods, memory and resources. It attests to the adaptive responses and interaction of various San communities, past and present, to survive in a desert environment.

The #Khomani San people, a formerly nomadic population which is said to be the last indigenous San community in South Africa, developed subsistence strategies to cope with the extreme conditions of the environment. They developed a specific ethnobotanical and veld knowledge as well as cultural practices and a worldview where geographical features embody symbolic links between humans, wildlife and the land.

No San population resides within the nominated property; however a portion of the southern edge of the KGNP has been set aside for use by the #Khomani San people, to practice and rejuvenate aspects of their culture, such as traditional hunting, collecting medicinal and food plants, accessing the dunes and carrying out other economic activities. This land forms the !Ae!Hai Kalahari Heritage Park.

The nomination dossier holds that much San heritage can also be found outside the nominated property in small settlements, farms and other areas. The most relevant would include areas returned to the #Khomani through land-claim settlement – the farms of Sonderwater, Rolletjies, Erin, Witdraai, Uitkoms, Scotty's Fort, Andriesvale, Miersshoopan, and the town of Rietfontein.

ICOMOS requested from the State Party additional description and information on the property, on association of the population and on how their millennia-long presence has shaped the landscape.

The State Party has submitted a large amount of information but this largely deals with the land-claim activity and only limitedly responds to the ICOMOS requests.

History and development

Until relatively recently the nominated cultural landscape was the domain of hunter-gatherers belonging to the linguistic group of the |Xam, which is said to have emerged around 20,000 years ago. They developed customs and beliefs that would be reflected in rock art painting and engravings, where rock was available, i.e. in areas other than the nominated property.

Around 2000 years ago Khoekhoen herders are said to have migrated into southern Africa and to have progressively assimilated and supplanted the |Xam. Subsequently, Bantu-speaking groups also reached South Africa, encroaching on the space of the San. However, it is claimed that these migrations left the nominated property and its indigenous population unaffected.

Substantial disturbance and change were to come with the colonial and post-colonial eras: the increasing occupation and colonisation of larger and larger areas by Europeans pushed into progressively smaller areas various groups of hunter-gatherers, herders and other groups, who competed with each other for the limited resources. The conflicts that flared across South Africa between the late 19th and early 20th centuries contributed to the displacement and disappearance of indigenous

populations. Subsequently the survivors were forced to abandon their lifestyles and cultural practices.

The creation of the Kalahari Gemsbok National Park (KGNP) in 1931 led to the relocation of indigenous and Baster families (a group descended from European settlers and African women) elsewhere: these were given the land along the southern edge of the Park, while the San were simply expelled from this territory.

After World War II, the situation for the San people got worse as the western and southern boundaries of the KGNP were fenced to prevent hunting and, in 1971, the Mabuasehube Game Reserve was created and incorporated into the Gemsbok National Park (Botswana) in 1992. In 1999, South Africa and Botswana signed a treaty to create the Kgalagadi Transfrontier Park.

In 1995 various Bushmen groups initiated a joint land claim for the restitution of the land that had been taken from them for the creation of the KGNP, which was settled some years later. The land was transferred to the #Khomani San Communal Property Association (CPA) and includes the farms Sonderwater, Rolletjies, Erin, Witdraai, Uitkoms, Scotty's Fort, Andriesvale and Miersshoopan.

3 Justification for inscription, integrity and authenticity

Comparative analysis

The nomination dossier carries out a comparison with three World Heritage properties: Tsodilo, Botswana (2001, criteria (i), (iii) and (vi)), Uluru-Kata Tjuta National Park, Australia (1987, extension in 1994, criteria (v), (vi), (vii) and (viii)), and Maloti-Drakensberg Park, Lesotho and South Africa (2000, extension in 2013, criteria (i), (iii), (vii) and (x)). The comparison is developed around the criteria used for the nomination and the focus of the nominations.

The nominated property is seen to differ from Tsodilo because of its size and the focus on the #Khomani traditions and practices. #Khomani Cultural Landscape is seen to share many similarities with Uluru-Kata Tjuta, although the nominated property differs due to its association with a different cultural tradition, its location on another continent, and association with the earliest possible human ancestors of humankind. Finally, the main difference with Maloti-Drakensberg is the absence of rock art in the nominated property and the fact that the nominated property is a living landscape, that is, where the association with the people continues, whereas Maloti-Drakensberg reflects relict cultural associations.

ICOMOS considers that the chosen comparators are appropriate, but far from sufficient. The analysis only includes World Heritage properties and does not consider properties on the Tentative Lists of the State Parties or other relevant properties for the nomination.

Other sites that could be considered should include other African hunter-gatherer sites such as Koutammakou, the Land of the Batammariba, Togo (2004, criteria (v) and (vi)), where people have subsisted for centuries as a model of sustainability. Other associative landscapes could have been considered for comparison, drawing from within or outside the World Heritage List.

There are at least two directly relevant comparators for the nominated landscape from the Tentative Lists: Sān Living Cultural Landscape, Namibia (proposed criteria (v) and (vi)), and the Central Kalahari Game Reserve, Botswana (proposed criteria (v), (vii) and (x)), which in their projects for justification include reference to the San and their role in shaping the landscape. ICOMOS considers that the nominated property needs to be compared with the above-mentioned properties and with other cultural landscapes associated with other existing African hunter-gatherer communities, including San, Hadza and Sandawe. This is needed if the State Party intends to prove whether the nominated #Khomani cultural landscape reflects in an exceptional and outstanding manner the association with the #Khomani-San cultural traditions or there could be room for a different nomination strategy.

ICOMOS considers that the comparative analysis does not justify consideration of this property for the World Heritage List at this stage.

Justification of Outstanding Universal Value

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The red dunes of the #Khomani cultural landscape are associated with the #Khomani and related San people, who descend directly from the ancient population that inhabited southern Africa around 150,000 years ago and are the ancestors of all humans;
- The #Khomani cultural landscape is a unique and outstanding associative landscape due to in-situ biological continuity. The #Khomani exemplify the unique technology and way of life that the San developed to survive in this desert landscape and their culture represents a living link to the artistic legacy of San culture in southern Africa;
- The survival of the last speakers of the !Ui–Taa languages in the #Khomani community is of enormous significance and they are actively recovering their knowledge and cultural practices and traditions, reviving their associative cultural landscape.

ICOMOS considers that the justification focuses primarily on the #Khomani people, their biological and cultural continuity, particularly their languages and their indigenous knowledge, rather than on the nominated property.

While considering languages and cultural diversity very important, ICOMOS observes that the World Heritage Convention is a property-based convention and therefore it is properties that need to reflect peoples' associations with the land or sites. Languages and intangible heritage are important aspects of human culture but other conventions exist within the UNESCO framework under which these forms of heritage can be recognised.

With regard to the property, the nomination dossier does not provide sufficient evidence and arguments to demonstrate how and to what extent the nominated landscape outstandingly reflects tangible and long-lasting associations with the #Khomani San or their interaction with the environment.

The additional information provided in November 2016 by the State Party on linguistic groups inhabiting the wider region attest that San linguistic groups and the related speaking peoples are spread well outside South Africa, in Namibia and in Botswana.

Therefore, ICOMOS considers that several groups survive that belong to San-related people in South Africa, Namibia and Botswana and they also have left traces on landscapes in the same region: only a comparative analysis may reveal whether the nominated property, or other landscapes, could be considered outstanding examples reflecting this interaction.

Integrity and authenticity

Integrity

The State Party holds that the #Khomani Cultural Landscape includes all attributes that are needed to convey its Outstanding Universal Value. The nominated property is said to include a vast area where the #Khomani have commercial, symbolic and cultural rights. It also contains many historically important cultural heritage sites along the Nossob and Auob Rivers and in the dune corridors. Many graves can be found in the KGNP and further south at Welkom, Witdraai and Andriesvale, including the burial of the important traditional leader Dawid Kruiper.

ICOMOS notes that the dossier itself recognises that the original landscape of the #Khomani and other San-related people is much larger than the one being nominated. ICOMOS concurs with this view and considers that the nominated property represents only a portion of what used to be exploited by the #Khomani San. The historical landscape of the #Khomani San is known to extend into much of the Northern Cape, southern Namibia and western Botswana.

Elements expressing the values are included in the core area; however, stronger living traditions and elements representing the #Khomani way of life can be found in their communities, located approximately 72km from the nominated property. In Askam and the nearby reclaimed farms, the #Khomani San have places of memory and burial grounds, and practice various aspects of their culture.

IUCN notes that large areas of the landscape that represents the #Khomani relationship with the land, including the places where the #Khomani live, areas of nature conservation significance and areas that are cultural sites, is outside the National Park. Whilst much of this land is owned by non-San private owners, and thus potentially difficult to include in an inscribed area, it seems essential that this area should be more clearly considered as intrinsic to the identification, definition and protection and management of the relationship between the #Khomani San people and nature.

In this regard, ICOMOS considers that, due to the distance from their area of residence, there might be a danger that, in the long term, the #Khomani way of life will be more entrenched in these communities than in the nominated property. However, efforts are being made to restore the connection between the #Khomani and the land of the nominated property.

Authenticity

The dossier states that the nominated property exhibits associative attributes in the traditional knowledge, the languages, the cultural practices, and place names that reflect the links of the #Khomani San with the nominated property. The regained rights to the land and to its traditional use contribute to restoring aspects of the culture without fossilising it.

There still exist a few remaining N/uu-speakers among the #Khomani San communities, and efforts are being made to spread the language to the younger generation. In the broader cultural landscapes, other first people languages are still being spoken in southern Botswana.

ICOMOS considers that, indeed, oral traditions, memories and historical records connect the #Khomani San to the land. These, however, have not been illustrated or explained sufficiently in the nomination dossier. Memories of hunting places, sacred trees, burial places, wells, and pans are retained and rich botanical and zoological knowledge still exists but this needs to be documented and the connections explained, in order for them to act as sources of information on authenticity.

ICOMOS also notes that no sufficient information on the attributes that would express the values of the nominated property have been provided in the nomination dossier, and a direct and long-lasting link between the cultural practices, the language and the places names within the landscape has not been demonstrated.

Additionally, the fact that #Khomani San groups can be found in Botswana and Namibia and that their historic landscape was much wider than what is currently being nominated, does not support the arguments proposed in the nomination dossier. Only through substantial additional research and information on the key attributes of the nominated property and their relationships, could the property be seen as a credible witness of the proposed Outstanding Universal Value.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity have not been met at this stage.

Criteria under which inscription is proposed

The property is nominated on the basis of cultural criteria (iii), (iv), (v) and (vi).

Criterion (iii): *bear a unique or at least exceptional testimony to a cultural tradition or to a civilisation which is living or which has disappeared;*

This criterion is justified by the State Party on the grounds that #Khomani tradition is based on rituals and associations between people and particular places and on the persistence of the lifestyle of hunter-gatherers who have lived in the region for at least 100,000 years. The presence of San people and their ancestors is supported by archaeological evidence and intangible attributes (e.g. place names). Following the extinction of the !Xam culture, the #Khomani remain as the sole bearers of what survives of this culture.

ICOMOS considers that the argument that the #Khomani San represent a 100,000-year old tradition is problematic for various reasons.

Firstly, looking at contemporary San communities as remnants of a Pleistocene people is seriously flawed. It negates social, cultural and environmental changes. There is ample archaeological, historical and ethnographic evidence for cultural dynamics over thousands of years.

Secondly, the archaeological evidence of San presence within the property is not discussed in the nomination dossier. It can thus not be ruled out that the property might have become meaningfully occupied by San foragers much later, possibly only some 2000 years ago, when agriculturalists pushed them to ecologically more marginal areas. During the colonial era, this process continued due to competition with both indigenized populations and with the colonisers; with the creation of the KGNP, people were forced out of the property and a forager lifestyle was lost.

Describing and discussing aspects related to toponyms, ethno-botany and traditional knowledge as it was, or still is, practiced in the nominated property would be necessary to provide arguments in support of this criterion.

Therefore, in the absence of detailed analysis and discussion of the evidence mentioned above, ICOMOS considers that the property cannot be said to reflect a unique or exceptional testimony to a cultural tradition or a civilisation.

ICOMOS considers that this criterion has not been justified.

Criterion (iv): *be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;*

This criterion is justified by the State Party on the grounds that the #Khomani Cultural Landscape illustrates a landscape shaped by hunter-gatherers. They left traces of their use and these are marked by the elders. Evidence exists of cultural practices and potent associations between beliefs and places. These survive in the oral history and cultural practices of the #Khomani elders. Several archaeological sites related to the |Xam culture have been discovered south of the nominated property and these have been cross-referenced with the records of their culture collected through interviews in the 1870's. While the |Xam no longer survive, the #Khomani are said to be the continuation of this tradition.

ICOMOS considers that the nomination presents the physical environment of the property and mentions cultural adaptation to the arid ecology (sustainable resource use, tracking skills, ethno-medical botany) by hunter-gatherers. There are several problems with this assertion: the #Khomani are no longer hunter-gatherers and it is not clear to what extent they impacted this landscape, as there is no presentation and discussion of historical/archaeological data on the nature, extent and antiquity of hunting-gathering within the property in the past.

The reference to the |Xam culture is not relevant as its traces are said to be found elsewhere, south of the nominated property, and also the |Xam culture does not survive. Using the #Khomani as a proxy of the |Xam - as living inheritors of the |Xam tradition – does not appear to be appropriate.

ICOMOS considers that this criterion has not been justified.

Criterion (v): *be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change.*

This criterion is justified by the State Party on the grounds that the #Khomani Cultural Landscape reflects the way of life that dominated the region for several millennia and which shaped this property. The cultural and subsistence practices of the #Khomani San before

the loss of their lands has been documented and are said to be unique. The return of their lands gives the #Khomani opportunities to sustain at least some of their cultural practices. Additionally, the #Khomani and other San groups of the region are considered to be the direct descendants of the ancestors of all humankind.

ICOMOS considers that the nomination dossier provides very little explanation or evidence of how the long-standing practices of the #Khomani hunter-gatherers have impacted and shaped the nominated property. More information and arguments are necessary to demonstrate whether the property could reflect outstandingly a land-use developed over a long span of time in an extreme climate by hunting-gathering practices, or by much later foraging activities.

ICOMOS considers that this criterion has not been demonstrated at this stage.

Criterion (vi): *be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;*

This criterion is justified by the State Party on the grounds that the records of the #Khomani culture of their traditional knowledge and ethno-medicinal plants demonstrate the richness of veld knowledge they still hold and which they used to make a living out of a hostile environment. In particular, the N|u language was used to name places important for the San. The languages of the #Khomani preserve the knowledge of the San people and are a direct link with the |Xam language, which has been registered in the Memory of the World Register.

ICOMOS considers that the nomination dossier has not sufficiently elaborated upon the justification of this criterion and has not provided sufficient information on the indigenous knowledge systems or the toponyms or other intangible dimensions that might support the justification of this criterion. The presence of San place names is stated but no examples given or explanations about their historical, social or cultural significance.

Additionally, ICOMOS notes that the dossier tries to link the #Khomani to the rich historical ethnography of the |Xam and their highly artistic rock art known from elsewhere in South Africa. This shift appears highly problematic, in that referring to the #Khomani as the sole surviving group directly linked to this now culturally extinct group appears to be like using the #Khomani traditions and cultural expressions as a proxy for the |Xam rather than recognising that they deserve consideration in their own right.

ICOMOS considers that further arguments need to be provided on the spiritual associations, the traditional knowledge, and other intangible manifestations of the #Khomani San traditions that would express their associations with the nominated property.

ICOMOS considers that this criterion has not been justified at this stage.

In conclusion, ICOMOS does not consider that the nominated property meets the criteria at this stage, nor the conditions of integrity and authenticity.

4 Factors affecting the property

Among the factors affecting the nominated property, the nomination dossier mentions tourism development and the impact it may have on the traditions and way of life of the Bushmen community; environmental pressures deriving from tourism activity, such as waste or pressure on scarce resources; and potential increase of visitation due to the nomination process. All these factors can and are being addressed through the management instruments and action by the management authority.

ICOMOS considers that the most concerning factor that can impact negatively on the value of the property as an associative cultural landscape is the distance between the residential areas of the Bushmen communities and the nominated landscape that may, over time, weaken their associations with the property, as practicing traditional and ritual activities becomes difficult.

ICOMOS considers that the main threats to the property are the difficulties related to practicing the traditional activities and rituals that keep alive the associations with the landscape.

5 Protection, conservation and management

Boundaries of the nominated property and buffer zone

The boundaries of the nominated property (959,100ha) are clearly defined. To the east, west and north, the boundaries are defined by South Africa's international borders with Namibia and Botswana. To the south, the boundary follows the existing park delimitation.

ICOMOS notes that the landscape that is being nominated is confined to South Africa, whilst the historic landscape pertaining to the San also extends to neighbouring Namibia and Botswana. Botswana has on its Tentative List the Central Kalahari Game Reserve as a mixed property based on the human/nature interaction of the Basarwa (San people). At present, even within South Africa, aspects of the #Khomani's living culture and other places of memory are outside the nominated property.

In October 2016, ICOMOS requested additional information from the State Party on the rationale for delineating the boundaries of the nominated property. The State Party responded on 14 November explaining that the area corresponds to the ancestral lands of the #Khomani and that knowledge of the cultural landscape was retained by the generation that was removed from it.

ICOMOS considers that the distribution of the San-speaking people in a much wider area indicates that the boundaries need to be reconsidered, in light of the focus of the nomination and of the evidence, as well as tangible and intangible attributes supporting the justification for inscription.

No buffer zone is proposed for the nominated property, relying on buffering mechanisms of the planning system.

ICOMOS considers that, depending on the revision of the boundaries of the nominated property, the need for a buffer zone or of buffering mechanisms may be reconsidered.

In conclusion, ICOMOS considers that the boundaries of the nominated property do not appear adequate at this stage. The need for a buffer zone may be reconsidered, on the grounds of revised boundaries of the nominated property.

Ownership

The section of the nominated property falling within the KGNP is owned by the State and administrated by SANParks, whilst the #Khomani section of the Heritage Park is owned by the #Khomani Community Property Association and the Mier section of the Heritage Park is owned by the Mier municipality.

Protection

The nominated property falls in its entirety within the Kalahari Gemsbok National Park and the Kgalagadi Transfrontier Park (KTP), which provide formal statutory protection status for natural protected areas. The relevant environmental protection laws are the National Environmental Management Act, 1998 (NEMA); National Environmental Management: Protected Areas Act n. 57/2003 (NEMPAA) and National Environmental Management: Biodiversity Act. All archaeological sites within the nominated landscape are protected under the National Heritage Resource Act n. 25/1999 (NHRA).

Further protection is granted by the planning system which is regulated by an array of laws and instruments. The Municipal System Act (2000) requires that local and district municipalities prepare an Integrated Development Plan (IDP) – a strategic planning instrument which guides and informs all planning, budgeting, management and decision-making in a municipality and is reviewed annually. The 2016/17 IDP for the ZF Mgcawu (formerly known as Siyanda) District Municipality is in place. The Spatial Planning and Land Use Management Act, 2013 (SPLUMA) provides for the national, provincial and local spheres of government to

prepare Spatial Development Frameworks (SDFs) – with a 5-year lifecycle - to represent the spatial development vision and to guide planning and development decisions across all sectors of government. The ZF Mgcawu District Municipality's SDF is already in place.

Additionally, based on the Regulations (2010) of the National Environmental Management Act (1998), local authorities are requested to prepare Environmental Management Frameworks (EMF) which are suites of integrated environmental management (IEM) tools that can be used to support informed decisions regarding the management of impacts on the environment as a result of human activities and development; their usual lifespan is 5 years. The current ZF Mgcawu District Municipality's EMF was developed in 2008 and is now due for review.

ICOMOS observes that the array of instruments described above seem to form a solid basis for the protection of the property currently being nominated; however, it appears that the entirety of the property is not currently protected under the National Heritage Resources Act nr. 25/1999. Consideration should be given to the opportunity to add this layer of protection.

Particularly interesting is the embedding of Heritage Impact Assessment procedures under the NEMA and the NHRA.

ICOMOS also observes that the planning framework and its tools may also provide for buffering mechanisms, the effectiveness of which largely depends on their enforcement and adoption by all decision-makers.

Additionally, the above-mentioned plans need to be reviewed to directly spell out how they ensure the protection of the Outstanding Universal Value of the nominated property as buffering mechanisms.

ICOMOS finally observes it would be extremely useful in terms of management to develop an Environmental Management Framework specifically for the nominated property as a tool to assess impacts on its proposed Outstanding Universal Value and its attributes.

Traditional protection

The nomination dossier states that the #Khomani San now have inalienable rights and access to the nominated property and therefore are now in a position to participate in the conservation and protection of their heritage. A system of prohibitions and taboos protects the sacred trees, dunes, pans and burial places.

ICOMOS considers that the measures to safeguard the living heritage from pressures of modernization point in the right direction; the efforts of the #Khomani San need to be sustained and accompanied by a process of extensive recording of their traditions and practices. Strategies to overcome the problem of distance between the #Khomani San settlements and their lands within the currently nominated property need to be thought out to sustain the continuation of traditional practices.

Forms of coordination between legal and traditional protection need to be sought to ensure a participatory approach to protection and management.

In conclusion, ICOMOS considers that the legal protection in place for the nominated property could be considered adequate although consideration should be given to protecting its entirety under the National Heritage Resources Act. ICOMOS considers that the protective measures for the property could be adequate, if the planning framework is implemented. Regular updating of the planning instruments needs to be ensured and should integrate considerations of the need to protect the cultural values related to the #Khomani San. Intangible heritage needs to be thoroughly documented and recorded, as a basis for its protection and transmission. The need for establishing a buffer zone based on the buffering mechanisms in place may need to be reconsidered.

Conservation

The State Party reports that, whilst the natural heritage is in a good state of conservation, having being protected and managed for several decades, the cultural associations with the landscape have suffered dramatically, due to dispossession and marginalisation of the local people throughout the 19th and 20th centuries. The languages are highly threatened and the links between the young and the land has been weakened. The elders of the #Khomani still hold the sophisticated traditional knowledge about the Kalahari landscape, the properties of the plants, the natural resources and their use. Cultural mapping and documentation has been conducted in the property and the return of land to the #Khomani community has contributed to reviving the cultural practices and to developing recording programmes.

ICOMOS considers that little is explained in the nomination dossier about the results of inventories carried out so far. It also notes that although research has been developed on a number of aspects of the #Khomani culture, its results are dispersed in different institutions, with little accessibility for the #Khomani San themselves: keeping copies of this documentation also at the nominated property would be beneficial for the continuation of the research.

Some 30 cultural heritage sites have been documented. ICOMOS notes that this is a very positive step; however, this number is still inadequate considering the huge size of the cultural landscape. The heritage mapping programme is an on-going exercise that still needs to be consolidated, expanded and speeded up to take advantage of the cultural memory that still exists within the #Khomani community.

ICOMOS considers that, overall, a lot still needs to be done. The archaeology, history, living heritage and intangible heritage still need to be documented: archaeological investigations focussing also on the human-made environmental modifications may assist in

improving the understanding of the length of time of occupation and use of the nominated landscape by the #Khomani San and other San-related populations.

Conservation work in the nominated property is carried out by SANParks which works with traditional knowledge holders in their day-to-day activities and involves the #Khomani San in tracking game. They also work closely with the #Khomani San in the Heritage Park in the intergenerational revitalization of significant cultural practices within the communities and at the Imbewu veld school.

ICOMOS considers that most conservation measures are planned for and programmed. Conservation intervention in the park is based on sound research. Local communities play an integral part in the conservation programme, although their involvement in the maintenance of the property is still a work in progress, as the #Khomani San are still improving their structures to respond to these tasks.

In conclusion, ICOMOS considers that much research has been produced on the San and particularly on the #Khomani San culture. However, the inventorying exercise within the nominated property is still in its early stages and needs to be continued and expanded as a matter of urgency, especially with regard to traditional knowledge. Archaeological investigations are necessary to improve the understanding of how, for how long, and to what extent the nominated property has been altered by hunting-gathering, foraging and other subsistence practices of the indigenous populations.

Management

Management structures and processes, including traditional management processes

The nominated property is in a protected area which is currently run by a designated management authority, SANParks.

Following the finalisation of the restitution claim, the #Khomani and Mier communities signed with SANParks a co-management framework for the management of the nominated property involving extensive consultation with stakeholders, which has been set up and is in operation through the !Ae!Hai Kalahari Heritage Agreement. The co-management framework is driven by the Joint Management Board (JMB) comprising representatives of SANParks and the #Khomani San and Mier communities that oversee the management of the property.

Within the property the #Khomani San have rights of access and use of natural and cultural resources and, even in the protected zones, the San community has cultural and symbolic rights. These are recognised in management zones to allow for biodiversity and heritage conservation, community use and tourism development. They include the San Symbolic and Cultural Zone

(S-Zone), the San Commercial Preferential Zone (V-Zone) and the Natural Priority Areas.

Traditional management

The use of natural resources in the nominated property by the #Khomani San will be regulated by traditional management practices which emphasise sustainable utilisation of resources. Sustainable use of natural resources is the focus of training at the Imbewu veld school/bush camp that is operational and run by the #Khomani San communities. The #Khomani San intend to formalise their exploitation thresholds and are in the process of producing written protocols to guide traditional use of natural resources within the nominated property.

ICOMOS considers that the above steps are very important for the sustenance of the communities and of their traditions and recommends that the envisaged thresholds be defined and the protocols finalised and implemented. They will also represent a useful basis for the education and training of the younger members of the communities.

ICOMOS notes that the nomination dossier does not mention specifically any plan or strategy for risk management nor does it appear in any of the management plans annexed to the nomination. ICOMOS considers that a disaster risk management strategy/plan is necessary, to ensure that measures are in place to minimise the impacts on the attributes of the property in case of disasters.

Conservation work is carried out by skilled and qualified people (game wardens, cultural heritage managers and by members of the local community). On the other hand, cultural heritage officers are centrally based at SANParks' Head Office in Pretoria and their involvement in regular conservation work is limited. Therefore, expertise in archaeological, heritage and historical issues in the day-to-day running of the nominated property is necessary, so as to elevate the cultural heritage component in the park to the level of the natural heritage. There is also the need to build capacity among local communities to assist them in their efforts to safeguard their living heritage and to enable them to be more involved in the conservation activities in the nominated property.

Policy framework: management plans and arrangements, including visitor management and presentation

The property enjoys an array of management plans: the Kalahari Gemsbok National Park Management Plan (2008-2013); the !Ae!Hai Kalahari Heritage Management Plan – which was appended to the Land restitution agreement in 2002 and then reviewed in 2008; the #Khomani San Tourism Development Plan, and the Kgalagadi Transfrontier Park Joint Management Plan.

SANParks adopted a policy in 2006 that guides all its actions and includes consideration of indigenous peoples' rights and their traditional knowledge in the protection and management of protected areas under their responsibility. ICOMOS considers that the above-mentioned plans attest to the efforts made over the last 10-15 years to achieve an effective and participatory management for the National Park, and this represents a solid basis for the management of the property. However, ICOMOS considers that these plans need revision and updating and to be integrated with specific consideration of the cultural value of the property and of the attributes that convey this value.

ICOMOS considers that a clear framework/hierarchy among the existing plans is needed in order to ensure integration, collaboration and effectiveness in management. A common action plan with prioritised activities and an identified responsible implementing body is necessary. Particular attention should be paid to ensuring that development opportunities be used to improve the living conditions and the capacity of the local communities.

Involvement of the local communities

Local descendent communities have been involved in the nomination process and are actively involved in the protection, conservation and management of the nominated property.

ICOMOS concurs with this view, but considers that, since the local community has been marginalised for a long time, there is a need to build capacity of the local communities to increase their involvement in all aspects of management, conservation and safeguarding of the nominated property.

IUCN noted the commitment of KGNP to community participation, which entails a Joint Management Board (JMB) and provision for cultural use in different zones within the property. The participation of the #Khomani in the management of the property remains still at an early stage and needs to be accorded progressive support. IUCN noted that there will be room to improve the functioning of the JMB over time, so that communities are not only consulted but empowered and supported to take a greater role in management and leadership.

ICOMOS considers that special attention is needed for the effective implementation of the joint management and the involvement of the local and indigenous communities in the management process.

In conclusion, ICOMOS considers that the management system should be extended to include a risk management strategy. Furthermore, ICOMOS recommends that the different existing management plans be updated and a clear framework and hierarchy amongst them be established to ensure the adequate and respectful management of the cultural values and attributes of the nominated property.

6 Monitoring

SANParks as the management authority is responsible for the monitoring system which is based on indicators already developed within the management system and plans for the KGNP.

ICOMOS considers that although the monitoring system is highly developed and serves the purpose of the National Parks authority, what is in place has not been based on the attributes of the nominated property that would reflect the proposed Outstanding Universal Value and on the most likely factors affecting the property. ICOMOS considers that the existing monitoring system and indicators could be a basis on which to build an ad-hoc monitoring framework for the monitoring of the nominated property, its attributes and the effectiveness of the management objectives.

In conclusion, ICOMOS considers that the monitoring system needs to be developed in relation to the attributes of, and the most likely threats to, the property.

7 Conclusions

ICOMOS congratulates the State Party for this nomination, which concerns a type of property which is still underrepresented on the World Heritage List.

However, the current proposal appears rather premature from several perspectives.

The documentation presented in the description section only in a very limited way concerns the nominated property and, rather, focuses on the #Khomani San people, their languages, and their successfully-settled land claim. The nomination dossier does not provide sufficient evidence and arguments to demonstrate how and to what extent the nominated landscape outstandingly reflects tangible and long-lasting associations with the #Khomani San or their interaction with the environment.

The additional information provided in November 2016 by the State Party upon ICOMOS' request does not provide the information that is needed.

The justification focuses primarily on the #Khomani people, their biological and cultural continuity, particularly their languages and their indigenous knowledge, rather than on the nominated property and on the attributes, tangible and intangible.

This approach does not fit within the World Heritage Convention, which is a property-based convention and therefore requires that the nominated property reflects peoples' associations with the land or sites. Languages and intangible heritage are important aspects of human culture but other conventions exist within the UNESCO framework under which these forms of heritage can be recognised.

The additional information expanding on linguistic groups inhabiting the wider region attests that San linguistic groups and the related speaking people are spread well outside South Africa, in Namibia and Botswana. The Tentative Lists of Namibia and Botswana include two properties – the Sān Living Cultural Landscape, and the Central Kalahari Game Reserve – which refer to the San and their role in shaping the landscape. However, the nomination dossier does not mention these properties in the comparative analysis or elsewhere.

The integrity of the nominated property also poses questions, as the original landscape of the #Khomani and other San-related people is much larger than the one being nominated and therefore the nominated property represents only a portion of what used to be the #Khomani San associative landscape.

The conditions of authenticity also raise issues: the oral traditions, memories and historical records connecting the #Khomani San to the land have not been illustrated or explained sufficiently in the nomination dossier, nor related to specific places in the nominated property. Further documentation is needed to document the memory of hunting places, sacred trees, burial places, wells, and pans, as well as botanical and zoological knowledge.

None of the criteria could be considered demonstrated at this stage, due to insufficient information and problematic justifications.

Arguing that the #Khomani San represent a 100,000-year old tradition cannot be supported: looking at contemporary San communities as remnants of a Pleistocene people would negate social, cultural and environmental dynamics, of which ample archaeological, historical and ethnographic evidence exists. On the other hand, the archaeological evidence of San people's presence within the property is not discussed in the nomination dossier and it is not clear to what extent the #Khomani San impacted this landscape. The reference to the |Xam culture is not relevant as its traces are said to be found elsewhere, south of the nominated property, and the |Xam culture does not survive.

More information and arguments are necessary to demonstrate whether the property could reflect outstandingly a land-use developed over a long span of time in an extreme climate by hunting-gathering practices, or by much later foraging activities.

The nomination dossier has not provided sufficient information on the indigenous knowledge systems, the toponyms or other intangible dimensions, that might support criterion (vi).

The issues expressed above also impact on the conditions of integrity and authenticity as well as on the boundaries of the nominated property, which currently are not justified.

The legal protection in place is complex and made up of an array of different instruments, including planning provisions, and in order to be considered adequate it could be strengthened.

Much research and inventorying activity has been carried out but this is still far from being sufficient and the documentation of intangible attributes is a matter of urgency.

The management system is very well articulated and relies upon a co-management framework that envisages the engagement of the #Khomani San and of the Mier communities as well as upon several plans that need to be coordinated amongst each other to ensure that the cultural values are sustained and promoted.

In summary, ICOMOS considers that further work is needed to achieve a convincing nomination for the cultural landscape associated to the #Khomani and other San-related peoples.

8 Recommendations

Recommendations with respect to inscription

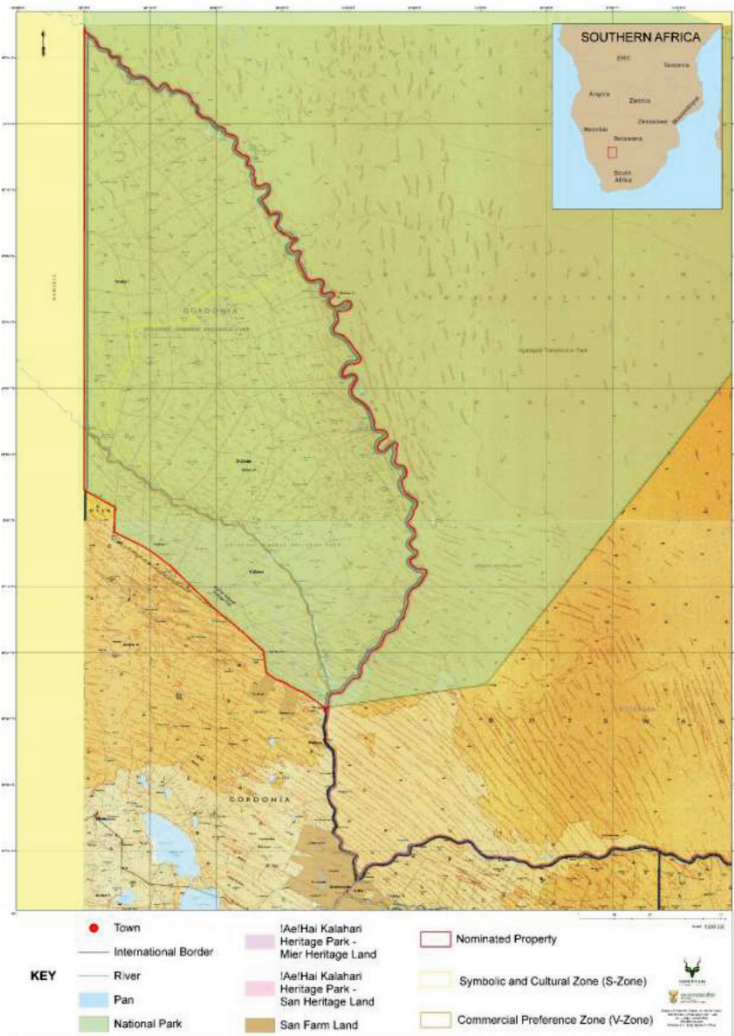
ICOMOS recommends that the examination of the nomination of #Khomani Cultural Landscape, South Africa, to the World Heritage List be **deferred** in order to allow the State Party, with the advice of ICOMOS and the World Heritage Centre, if requested, to:

- a) Reconsider the scope of the nomination on the basis of an expanded and augmented analysis of the region in relation to the historical distribution of the San and #Khomani San communities in the landscape and to the presence and density of tangible and intangible attributes that reflect their spiritual associations and their traditional subsistence practices,
- b) Revise the justification for inscription and the criteria, focussing on the most appropriate ones in relation to the potential of the property and the focus of the nomination,
- c) Reconsider the boundaries of the nominated property on the basis of an assessment of the analysis mentioned above,

- d) Augment the comparative analysis, basing it on the properties rather than on the peoples that inhabited them;

Any revised nomination should be visited by a mission to the site.

ICOMOS would be ready and willing to work along collaborative lines with the State Party to consider possible ways forward, if requested to do so.



Map showing the boundaries of the nominated property



Desert landscape



Historical and memorial tree



Ancient water sources



#Khomani San music and dance