

## Development versus Heritage: Evaluating the effectiveness of Archaeological Impact Assessments in Zimbabwe

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### Abstract

*In Zimbabwe, archaeological heritage is facing increasing threats from infrastructure development such as mining, agriculture, and climate change. Archaeological Impact Assessments play a crucial role in managing these threats by verifying that development projects take into account cultural heritage before they disturb the ground. Despite this, the impact of AIAs in Zimbabwe is still being studied, with a focus on their implementation, enforcement, and long-term sustainability. This research examines the success of AIA projects in Zimbabwe, exploring their potential to safeguard cultural heritage while also accommodating socio-economic development demands. The research takes a qualitative research approach utilising surveys and in-depth interviews with key stakeholders including archaeologists, heritage managers, Environmental Management Agency personnel and developers. Recent AIAs involving mining concessions, road expansion, dam construction, or other projects are case-studied to determine compliance levels and stakeholder engagement. Additionally, the success of mitigation is evaluated through these factors. The research reveals that while AIAs are legally obligated, the execution is not consistent as certain projects are fully in compliance with heritage protection regulations, while others proceed with little or no oversight and result in irreversible damage. The study also highlights the challenge of ensuring sustainable cultural heritage management in areas where sites are often overlooked. The research reveals that indigenous knowledge's potential for site interpretation and preservation in Zimbabwe is hindered by limited community involvement in Archaeological Impact Assessments, underscoring the need for more inclusive approaches that leverage local expertise and promote community-driven initiatives. The study suggests that enhancing AIA frameworks can improve preservation of heritage without impeding development. Some suggestions include incorporating AIAs earlier in project planning, using digital documentation techniques and encouraging multi-stakeholder cooperation. By critically examining Zimbabwe's AIA system, this research contributes to international debates on sustainable heritage governance and provides practical strategies for harmonizing cultural preservation with national development goals.*

**Keywords:** Archaeological Impact Assessments; sustainable development; sustainable heritage governance, compliance, stakeholder engagement, Zimbabwe

## **Introduction**

Archaeological heritage, which is a finite and non-renewable resource of crucial importance to economic sustainability and cultural identity, is naturally in conflict with the need for development projects brought about by population growth and technological advancement. (Nijkamp, 2012; Steibing, 1994; Castells, 1986). Population growth has resulted in the expansion of cities, sanitation facilities, and roads, among other things. In the face of these developments that are likely to disturb or remove both known and yet to be discovered archaeological remains, it is important that pre-development assessments in the form of Archaeological Impact Assessments (AIAs) are carried out. AIAs have, for over half a century worldwide, been implemented as a mandatory policy for mediating this contradiction as the pre-eminent mechanism for realizing the philosophy of sustainable development (Patiwael, Groote & Vanclay, 2019). Issues of sustainable development are emphasised in the United Nations Sustainable Development Goals (SDGs), particularly under SDG 11.4, which calls for strengthening efforts to protect and safeguard the world's cultural and natural heritage through the embedding of heritage protection within the planning process (UNESCO, 2015). However, the global impact of AIAs is spasmodic, and in Zimbabwe their use is heavily undermined by a cluster of unresolved challenges, with a great gap between policy intention and actual realization (Tapfuma, 2011). This study, therefore, seeks to identify the specific institutional, regulatory, and operational factors undermining AIAs in Zimbabwe, with the objectives of evaluating the adequacy of the existing legal framework, review of the stakeholders' roles, and identification of the key hindrances to their success. In the process, the study transcends its national interest to contribute to broader heritage management debates in the Global South, examining critically why lofty theoretical integration of culture into sustainable development collapses on the ground and propounding a better framework through which AIAs can truly safeguard irreplaceable heritage from the allure of progress.

## **Background to the implementation of AIAs**

AIAs are a fundamental heritage management tool. Morgan (2018) defined AIAs as the systematic investigation of a development area with the aim to identify archaeological resources and evaluate a project's potential impacts upon them. The development of AIAs as an organized practice is a direct response to the widespread destruction of archaeological heritage by post-Second World War redevelopment and heightened industrialization in the mid-20th century (Diefendorf, 1989). This worldwide crisis triggered a paradigm shift from rescue reactivity to preservation proactiveness,

entrenched in milestone instruments such as the UNESCO 1968 Recommendations and the 1990 ICOMOS Charter for the Protection and Management of the Archaeological Heritage (Tapfuma, 2011). These instruments legalized the overarching principle that archaeological heritage is a fragile, non-renewable resource, and that developers are to bear the cost of pre-development impact studies.

The United States' National Historic Preservation Act (NHPA) of 1966 was a landmark example, codifying the "polluter-pays" principle and encouraging the growth of a professional contract archaeology industry to keep pace with development (Berggren & Hodder, 2003). This example, with its emphasis on regulatory mandate and developer responsibility, has been replicated and adapted widely. In Africa, nations like Botswana and South Africa have integrated these principles into robust legal frameworks, such as South Africa's National Heritage Resources Act (1999) and the Monuments Relics Act of (2001), demonstrating a functional pathway to aligning development with heritage preservation (Deacon, 1996; Van Warden, 1996; Mitchell, 2002; Mmatle 2009, Moroka & Dichaba, 2010). It is against this global backdrop of established best practices that Zimbabwe's own implementation of AIAs must be critically examined. While the country has theoretically adopted the international model through its local law, the continuing implementation difficulties attest to a grave disconnect (Tapfuma, 2011; Musindo, 2010). The well-documented international trajectory, from recognition of an issue to the entrenchment of effective legal and commercial mechanisms, serves not as a model which Zimbabwe has followed, but as a benchmark against which its specific implementation successes and failures may be analysed. This background, therefore, establishes an international standard of practice to place the general research problem: the causes of the failure of this world-renowned system to work properly under the specific socio-economic and governance circumstances of Zimbabwe.

### **The Legal and Operational Framework for Archaeological Impact Assessments in Zimbabwe**

In Zimbabwe, the jurisdiction for Archaeological Impact Assessments lies in the Environmental Management Act (EMA) of 2002, which is prescriptive and states the environment comprehensively to encompass "places of cultural importance." This legislative framing has a profound meaning in that it places heritage protection within the process of environmental impact assessment (EIA), and thus makes AIAs a mandatory component for many development projects. Operationally, this creates a twin-governance regime. The master EIA process is monitored by the Environmental Management Agency (EMA), while the National Museums and Monuments of Zimbabwe (NMMZ) has the technical mandate to evaluate the AIA component.

Crucially, no development permit is issued without the agreement of the NMMZ Executive Director, a power derived from the NMMZ Act that prohibits destruction of heritage without its consent (NMMZ Act 25:11, section 26). However, the system is itself undercut by an absolutely crucial legislative gap. The original NMMZ Act itself does not proactively demand AIAs but only has a reactive provision to penalize destruction. This shortcoming forces NMMZ to operate in a legal weakness, depending on the EMA for its proactive authority. To cover this gap, in 2015, NMMZ revised its act to a new National Museums and Heritage Bill (2015) that is specific in AIA provisions (The National Museums and Heritage Bill, 2015, p. 26). However, the bill might take years to finalise. Meanwhile, NMMZ practices under the 1998 non-binding AIA guidelines. This practice of relying on guidelines rather than firm law can be argued to be the source of Zimbabwe's implementation challenges. While the guidelines outline a technically proper, three-stage process (desktop study, field survey, and mitigation) and properly assign costs to the developer, they are not binding and therefore cannot be enforced as such. The procedural devices, while professionally constructed, operate in a context of statutory ambiguity. The conflict between a well-designed procedural ideal and a weak legal mandate provides a fertile ground for the practical concerns that this study investigates such as non-compliance, contentious financial demands, and differential application of mitigation actions. Consequently, the same system put in place to protect Zimbabwe's archaeological heritage is itself structurally blocked from being able to do so efficiently, revealing a governance flaw at the heart of the development versus conservation tension.

## **Conceptual framework**

The research is informed by the concept of sustainable development, the concept of environment and the principle of preservation. These interconnected concepts provide a framework for analyzing the role of Archaeological Impact Assessments (AIAs) in Zimbabwe. Far from being isolated, these concepts form a rational sequence that explains the ideal, the mechanism, and the practical reality of managing heritage for development. Firstly, the notion of sustainable development provides the normative ideal. It contends that development must meet existing needs without compromising the ability of future generations to meet their own (Robert et al., 2005; United Nations, 1992), officially making cultural heritage emphasized by SDG 11.4 a part of resources to be conserved. This research uses this concept not so much as a definition but as a criterion by which to measure the sustainability outcome of Zimbabwe's AIA process. It raises the critical question: Does the current system, in practice, ensure the

intergenerational equity that sustainable development promises, or does it permit the irreversible loss of heritage for short-term gain?

Second, Zimbabwe's specific concept of environment, as legally defined in the Environmental Management Act (EMA) of 2002, represents the operational mechanism. By expressly placing "places of cultural significance" within the scope of the "environment," the legislation creates a statutory overpass to connect the wide ideal of sustainability with the real-world governance of archaeological resources. This model will be analyzed to assess its effectiveness. It is to be evaluated whether such structuring of legislation duly empowers the protection of heritage, or rather it subjects cultural interests to biophysical environmental concerns under the EIA process thereby creating a governance contradiction between the EMA and the National Museums and Monuments of Zimbabwe (NMMZ).

Finally, the doctrine of preservation comprises the utilitarian middle ground at the heart of AIAs. International charters among them the UNESCO 1968 and ICOMOS 1990 define a hierarchy of conservation, giving precedence to in-situ conservation but allowing record preservation (excavation and documentation) as an unavoidable compromise where development is unavoidable. It is the principle to be applied in this study to evaluate critically the effectiveness of AIAs in Zimbabwe. It is to be seen whether the choice between in-situ preservation and preservation by record is decided on strict archaeological importance, or is controlled by political pressure, financial need, and the weak legal mandate described above. The continued recourse to mere recording, with the lack of strong legal backing for in-situ preservation, runs the risk of converting a principle of accommodation into one of deliberate loss. Synthesizing this framework, the research is thus able to move from the ideal international (sustainable development) to the national instrument (concept of environment), and finally to on-the-ground practice (preservation as compromise). It provides a rational framework with which to examine whether AIAs in Zimbabwe constitute a genuine attempt at reconciling heritage and development, or if the governance loopholes available render such reconciliation a chimera, finally compromising the vision of sustainable development.

## **Data collection**

Data collection is an essential component of conducting research. For this study, data were collected through questionnaires, semi-structured interviews, personal observations, and consultation of both primary (reports, memos) and secondary documents (published research articles, books). Consultation of both published and

unpublished sources was important because insight into ways in which past AIAs as well as EIAs were conducted were useful in influencing the recommendations that were provided. Apart from providing information on the topic being discussed, both primary and secondary sources shaped the nature of this research as they revealed areas that had not been tackled by previous researchers, as seen in the literature review. Questionnaires were used to collect data from developers and environmental consultancy companies, while semi-structured interviews were conducted with heritage practitioners and EMA personnel. The developers were interviewed to gain an insight into their understanding of AIAs and their attitude towards sponsoring them. On the other hand, consultant companies are the ones that are carrying out EIAs for developers. Thus, there was a need to establish whether they are aware of archaeological heritage as well as considering it when conducting EIAs. Interviews were conducted amongst heritage practitioners who have carried out AIAs in Zimbabwe with the aim of gathering the manner in which they are awarded contracts and the problems that they faced in negotiating for contracts and undertaking AIAs. Problems faced have a bearing on the quality of the assessment carried out and the final report produced. Lastly, EMA personnel who are directly involved with the whole process of EIAs were interviewed with the intention of gathering whether they are making an effort to notify developers to carry out AIAs.

### **Successes and Failures in Zimbabwe's Archaeological Impact Assessments (AIAs)**

Archaeological Impact Assessments are a major regulatory tool which is designed to reconcile the competing interests of development and protection of cultural heritage. AIAs have in Zimbabwe had irregular application, with both exceptional practice and pronounced failure. The section reviews a series of case studies in order to tease apart the variables upon which AIAs succeed or fail. Through the comparative cases, the proactive rescue in Tokwe-Mukosi Dam, the Khami regulatory failure, the politicized planning at Great Zimbabwe University, and the narrowly averted crisis in Hwange, we can identify a common thread that robust legal frameworks are only effective in the presence of sustained enforcement, institutional coordination, and genuine effort to mainstream heritage into the development agenda. The construction of Zimbabwe's largest inland reservoir, the Tokwe-Mukosi Dam, posed a risk to a dense archaeological landscape (Mutangi & Mutari, 2014). This case is Zimbabwe's strongest example of an effective, albeit challenging, AIA process. The National Museums and Monuments of Zimbabwe initiated extensive pre-construction surveys, which revealed over 20 significant archaeological sites in the upcoming inundation area, predominantly dating



from the Late Iron Age (c. 900-1450 AD) (Pwiti & Ndoro, 1999). The surveys also documented significant rock art sites that attest to earlier hunter-gatherer occupation (NMMZ Report, 2014). Once high-priority sites had been identified in the initial surveys, NMMZ organized rescue archaeology campaigns to recover as much information as possible before inundation. The intervention was successful on two fronts. It did so in the first instance by combining intensive archaeological salvage with innovative community outreach. Rescue excavations uncovered intact pottery, ironwork, and houses that offered fresh information on early Shona settlements. Of greater importance, the incorporation of ethnographic studies identified intangible heritage (rain-asking shrines, ancestral graves, and other spiritually significant sites) which would otherwise have been archaeologically invisible. In a documented case, rituals were done to ritually "close" a sacred rain-asking shrine prior to flooding, according to guidelines provided by elders in the community (Fontein, 2006). Despite a number of challenges noted (see Ndoro 2005), the Tokwe-Mukosi project establishes that heritage mitigation is feasible. Its success depended on early action, correct data gathering, and holistic integration of both intangible and tangible heritage, and this provides an essential precedent for future major infrastructure projects.

On the other hand, the tragedy of the Khami National Monument, World Heritage Site teaches us the catastrophic results of ignoring AIA guidelines. Even when it is a national and international heritage monument, Khami's buffer zone, which is a crucial zone prescribed to protect the setting and integrity of the site, has been consistently violated since the early 2010s (UNESCO, 2019). The setbacks are two-pronged. Illicit residential and commercial construction has expanded, destroying archaeological deposits and compromising the visual character and Outstanding Universal Value of the site (NMMZ Report, 2019). Equally devastating have been the officially approved infrastructural initiatives such as road works and quarrying activities between 2015 and 2020 (NMMZ Report, 2019). The report clearly states that these activities were simply approved by local governments without the requisite AIAs. These earthworks irretrievably disrupted stratified levels of archaeology, destroying potential information regarding the Torwa State whose capital was at Khami.

The Khami case study has some valuable lessons for heritage management in Zimbabwe and globally. First, it illustrates that legal protection alone without real enforcement is insufficient. Second, it highlights the importance of conducting AIAs as mandatory prerequisites for any development within the vicinity of heritage locations. Third, it highlights the importance of enhancing coordination among government departments and local people for heritage management. Finally, it illustrates how

neglect in protecting heritage properties may have broader ramifications, including loss of global reputation and lost economic benefits.

The proposed construction of the Great Zimbabwe University (GZU) campus alongside the renowned Great Zimbabwe World Heritage Site presents a more complex problem, one of juxtaposed educational progress against sheer cultural significance. The controversy was not about wholesale opposition to development, but about critical flaws in the AIA process itself. The government and university promoted the project as an education and tourism windfall. However, an Environmental Impact Assessment, in which an AIA was included, was only done for the first stage of construction; the Convocation Hall (Great Zimbabwe University, 2016). This was the failure of the project. Reviewing, both NMMZ and UNESCO suspended the project due to the grounds that the assessment was too narrow. A complete EIA/AIA for all five phases proposed was necessary in order to understand the cumulative impact of the project upon the hydrology, visual environment, and archaeological integrity of the World Heritage Site. The controversy over the GZU highlights a fundamental contradiction of sustainable development; how to accommodate necessary development with irreplaceable cultural heritage. The example shows that even philanthropic projects require the highest standards of examination. The move by the heritage authorities forced a reconsideration, emphasizing that for locations of global significance, AIAs must be integral, inclusive, and bound by international conservation practices, and not chopped and changed to suit a developer's agenda.

The 2020 proposal to grant Chinese operators coal exploration licenses within Hwange National Park unleashed a huge outcry from the public, but the row was almost only framed in environmental and wildlife conservation terms even though the Park is extremely rich in archaeological resources, including the monumental stone buildings of the Zimbabwe culture (see McGregor 2005; Hwange National Park Management Plan, 2016-2026; Sagiya; 2019). The public outcry and concerted campaigns eventually led to a ban on mining in national parks and the subsequent cancellation of the Hwange permits (Nyoka, 2020). The Mines and Minerals Act (Chapter 21:05) authorises the Zimbabwean government to issue special mining grants. These grants permit companies, including foreign investors, to explore and extract minerals in designated areas, sometimes even in protected zones such as national parks. In some cases, the special grants are awarded with either no or minimal consultation as in the case of the Hwange one, which was granted without input from environmental agencies, local communities, or tourism stakeholders. The Zimbabwe's special mining grants allow the government to fast-track mining projects, often at the expense of environmental and



social safeguards. Although the projects were eventually stopped, the case reveals a critical blind spot in Zimbabwe's conservation story, which is the persistent neglect of archaeological heritage in natural landscapes.

The Hwange case is an important near-miss that exposes a siloing of heritage at the disciplinary and institutional levels. It indicates that the public and government mind involves a narrow perception of "conservation" to mean protecting nature, where cultural heritage has to be a secondary consideration. A good AIA regime requires that archaeological assessments are needed not just for building proposals, but for any operation that disturbs land, such as mining in protected areas, in order to have a coordinated policy of resource management.

### **Factors affecting the implementation and success of AIAs in Zimbabwe**

The success of Archaeological Impact Assessments in Zimbabwe is not hindered by the lack of law but by a cluster of intertwined systemic deficiencies. These are obstacles that can be categorized under four general areas that are disintegration of institutions, financial and attitudinal disincentives, deficiency in critical capacity, and an inadequate legal system. An examination of these reveals that the potential of AIAs is consistently thwarted by governance and resource shortfalls.

The most significant impediment to AIA enforcement is political isolation between the National Museums and Monuments of Zimbabwe and the Environmental Management Agency. Although national EIA policy refers to archaeological sites as sensitive areas that require consultation with stakeholders, EMA frequently issues development permits without NMMZ's approval. It is highly probable that EMA bypasses NMMZ because the pressure for economic development is high, while the consequences for neglecting cultural heritage are low. This failure of coordination among agencies has led to the loss of significant heritage. Notable examples include the erection of base stations at Cross Kopje (Marymount Teachers College, Mutare), a memorial site for soldiers who fought in World War I, and on Chiurwi and Gombe Mountains in Buhera (holds material that is indicative of an industrial metallurgical complex for smelting iron), highlighting the need for improved oversight and protection of cultural heritage sites (Chipunza, 2010). This conflict is accompanied by a blame game cycle. EMA blames NMMZ for not providing adequate information, such as the 1998 AIA guidelines, and argues that its overall environmental mandate causes complexities in prioritizing unseen archaeological resources. Conversely, NMMZ blames EMA for disregarding heritage concerns. This blame-shifting masks an even deeper failure in governance. As noted by Nhamo (2007),

EMA has operated in contempt of the international heritage conventions that Zimbabwe has ratified, reflecting a serious communication failure for which NMMZ, being the coordinating heritage organization, is also culpable. Reflecting on EMA's recruitment strategy, physical scientist, ecologists, economists, engineers, and social scientists are all employed by EMA permanently. Even though archaeologists are known worldwide as part of social scientists, EMA seems to have ignored that since social workers, sociologists, and psychologists are EMA's social scientists. These professionals have been helping with the evaluation of EIA reports and environmental auditing. However, a heritage practitioner has never been employed by EMA, even on a part-time basis. Instead, it appears convenient for EMA to send AIA reports to NMMZ. Effective application of AIA requires proactive communications by NMMZ to other levels of government, such as town planning authorities and EMA, in order to incorporate heritage consideration into all land-use decisions.

Profit-driven extractors' attitudes are also a significant market-based constraint. AIAs are generally viewed by most private proponents as being costly, profit-eating hurdles with no tangible financial advantage. This is in addition to enforcement frailties. Although some developers are evading EIAs because of financial implications, it is possible that some are deliberately ignoring them. The reason for ignoring EIAs might be a shortage of human resources at EMA to evaluate EIA reports and award permits delays project implementation. At the end developers prefer to be fined when caught as long as their project is not suspended. Even though EMA fines can be considered prohibitive, there are sometimes a drop in the ocean in comparison with profits that are likely to be accrued from the project. This is indicative of a key weakness; when law enforcement is lax and punishment is not a deterrent, the economic incentive stops being towards preservation and becomes towards destruction.

NMMZ is burdened by a critical shortage of qualified staff, which affects all stages of the AIA process. There are not enough archaeologists to conduct assessments, evaluate reports, and inspect compliance nationwide. The shortfall results in a reliance on ineffective and often imprecise desktop surveys since budgetary constraints limit visits to sites. Consequently, previously unvisited sites are assumed to be empty, leading to skewed conclusions and missing unrecorded sites. Moreover, the internal governance of NMMZ is compromised in the sense that the same individual (mostly the Chief Curator) is often assigned to evaluate and audit reports despite the fact that he is also an AIA consultant; an overt conflict of interest that violates NMMZ's own policies and EMA's best practices upholding transparency principles. Such a systemic defect contaminates the legitimacy of the entire AIA system.

The current NMMZ Act is a weak enforcement tool. It relies almost exclusively on Section 25 which makes intentional destruction without authorization illegal, but this reactive section has failed to drive proactive assessment. In most cases, NMMZ only invokes the intervention of EMA once heritage is lost, demonstrating the Act's failure as a preventative measure. Relative examination to counterparts in the region underscores Zimbabwe's legislative failure. South Africa's National Heritage Resources Act (NHRA) mandatorily seeks heritage authority approval for any development impacting a heritage resource, pending a thorough impact assessment (Warnich-Stemmet 2010). Botswana's Monuments and Relics Act (2001) likewise allocates a section to AIAs and integrates them into the approval process for development permits, creating a compulsory milestone (Moroka and Dichaba, 2010). Zimbabwe's proposed legislative revision must move beyond prohibitive clauses to establish clear, mandatory AIA triggers and seamless integration with other development approvals. To these legal loopholes is superimposed an underlying public ignorance. Consultancies and developers are not cognizant of the AIA guidelines and the NMMZ Act, and they have not been adequately disseminated. This indicates a breakdown of NMMZ's public information mandate to turn heritage conservation into an obscure legal regulation rather than a mainstream national interest.

The obstacles to effective AIAs in Zimbabwe are not standing alone but reinforcing. Institutional fragmentation leads to poor enforcement, and this creates economic incentives for developers to circumvent the system. This is further aggravated by insufficient capacity in NMMZ to monitor development and a reactive and not proactive legal system. In the future, reform must be holistic. There is a need for the redrafting of the NMMZ Act to capture the proactive and integrated approaches similar to those of Botswana and South Africa. There is also a need to address internal governance and capacity problems in NMMZ through, for instance, launching a continuous public awareness campaign and establishing coordination processes with EMA and other planning authorities like those in local government. Without this structural intervention, AIAs will remain a theoretical construct instead of an operative tool for preserving Zimbabwe's cultural heritage.

## **Conclusion**

This analysis has demonstrated that the inability to effectively implement effective Archaeological Impact Assessments in Zimbabwe is not a failing of the tool, but rather a reflection of deeper, more systemic botches of administration. Institutional analysis and

case studies exhibit the same: there is a good legal and methodological framework for protection of the heritage, but it is repeatedly undermined by institutional fragmentation, perverse economic incentives, and a severe lack of enforcement capacity. The recurring disconnects between NMMZ and EMA is more than administrative squabbling. It reflects a fundamental misalignment of national policy that keeps cultural heritage separate from, and subordinate to, environmental and economic goals.

This study makes a contribution in being analytical about naming these interlocking barriers, moving beyond merely listing oversights to uncovering the underlying system of governance that permits them. This study adds to the scholarly debate on heritage management by proving that very well-meaning legislation is ineffectual in the absence of requisite political will, cooperation among institutions, and economic funding for its enforcement. It emphasizes that sustainable development is a hollow premise where a nation's irreplaceable cultural heritage is sacrificed for fleeting profit. The study also revealed that the price of doing nothing is catastrophic. Aside from the immediate archaeological loss, the continued deterioration of a site like Khami and Great Zimbabwe puts Zimbabwe in trouble with UNESCO, jeopardizing the World Heritage status that translates into tourist dollars and national dignity. The wanton destruction of sites significant to ancient societies and the liberation struggle, like at Chiurwi Mountain, sever tangible links to the past, eroding cultural identity and historical memory.

Overall, AIAs are a potent preservation tool, but their potential in Zimbabwe is unrealized. The country is at a turning point; it can keep going down its present course, where uncontrolled development gradually wipes its cultural heritage from the map, or it can implement the needed systemic changes to adopt heritage conservation completely into its development agenda. The choice will determine not only what archaeological sites are preserved for future generations but also what kind of development, truly sustainable or fundamentally destructive, will define Zimbabwe's future.

## **Recommendations**

So, the path forward is precise, pragmatic reforms. With regards to legislative reforms, the NMMZ through the Ministry of Home Affairs and Cultural Heritage should prioritise the amendment of the NMMZ Act. It should follow the model of the progressive governments of Botswana and South Africa, directly mandating AIAs as a not optional prerequisite to the grant of development permits and clearly detailing the duty of the developer to pay for and carry them out. Moving forward, institutional integration must be facilitated by a formal Memorandum of Understanding between NMMZ and EMA.

This must allow for a shared digital platform for development proposals and mandate NMMZ approval of any project in mandated sensitive areas, making heritage not an afterthought but an integral consideration in environmental licensing. Furthermore, NMMZ will be required to take responsibility for its in-house governance by establishing an independent, multi-member committee for AIA evaluation and audit to ensure there is no conflict of interest. Concurrently, a coordinated public campaign among developers, municipal planners, and consultancies must be organized to redefine heritage as not a restriction, but a valuable national asset that is a critical component of sustainable development.

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