





PALAEONTOLOGICAL IMPACT ASSESSMENT FOR THE PROPOSED KALGOLD EXPANSION PROJECT BETWEEN MAFIKENG AND VRYBURG, IN THE NORTH WEST PROVINCE.

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Client: Environmental Impact Management Services (Pty) Ltd

PGS Project No: 355HIA









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Declaration of Independence

I, Elize Butler, declare that -

General declaration:

- I act as the independent palaeontological specialist in this application
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favorable to the applicant
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting palaeontological impact assessments, including knowledge of the Act, Regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, Regulations and all other applicable legislation;
- I will take into account, to the extent possible, the matters listed in section 38 of the NHRA when preparing the application and any report relating to the application;
- I have no, and will not engage in, conflicting interests in the undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing any decision to be taken with respect to the application by the competent authority; and the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- I will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- I will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favorable to the applicant or not
- All the particulars furnished by me in this form are true and correct;
- I will perform all other obligations as expected a palaeontological specialist in terms
 of the Act and the constitutions of my affiliated professional bodies; and
- I realize that a false declaration is an offense in terms of regulation 71 of the Regulations and is punishable in terms of section 24F of the NEMA.

Palaeontological Desktop Assessment for the proposed Kalgold Expansion project in the North West Province

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Disclosure of Vested Interest

I do not have and will not have any vested interest (either business, financial, personal or other) in the proposed activity proceeding other than remuneration for work performed in terms of the Regulations.

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ACKNOWLEDGMENT OF RECEIPT

Report Title	PALAEONTOLOGICAL IMPACT ASSESSMENT FOR THE PROPOSED		
	KALGOLD EXPA	NSION PROJECT BET	WEEN MAFIKENG AND
	VRYBURG, THE NORTH WEST PROVINCE		
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This Palaeontological Impact Assessment report has been compiled considering the National Environmental Management Act 1998 (NEMA) and Environmental Impact Regulations 2014 as amended, requirements for specialist reports, Appendix 6, as indicated in the table below.

Table 1 - NEMA Table

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section in	where not
Regulations of 7 April 2017	report	applicable.
	Page ii and Section 2	-
	of Report – Contact	
	details and company	
1.(1) (a) (i) Details of the specialist who prepared the report	and Appendix A	
(ii) The expertise of that person to compile a specialist	Section 2 - refer to	-
report including a curriculum vitae	Appendix A	
(b) A declaration that the person is independent in a form	Dage ii of the report	-
as may be specified by the competent authority	Page ii of the report	
(c) An indication of the scope of, and the purpose for	Section 4 – Objective	-
which, the report was prepared	Section 4 – Objective	
	Section 5 -	-
	Geological and	
(cA) An indication of the quality and age of base data	Palaeontological	
used for the specialist report	history	
(cB) a description of existing impacts on the site,		-
cumulative impacts of the proposed development	Section 10	
and levels of acceptable change;		
(d) The duration, date and season of the site		-
investigation and the relevance of the season to the	Section 1 and 11	
outcome of the assessment		
(e) a description of the methodology adopted in		-
preparing the report or carrying out the specialised	Section 7 Approach	
process inclusive of equipment and modelling used	and Methodology	
(f) details of an assessment of the specific identified		-
sensitivity of the site related to the proposed activity		
or activities and its associated structures and		
infrastructure, inclusive of a site plan identifying site		
alternatives;	Section 1 and 11	
		No buffers or
		areas of
(g) An identification of any areas to be avoided, including		sensitivity
buffers	Section 5	identified
(h) A map superimposing the activity including the	Section 5 -	
associated structures and infrastructure on the	Geological and	

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section in	where not
Regulations of 7 April 2017	report	applicable.
environmental sensitivities of the site including areas	Palaeontological	
to be avoided, including buffers;	history	
	Section 7.1 -	-
(i) A description of any assumptions made and any	Assumptions and	
uncertainties or gaps in knowledge;	Limitation	
(j) A description of the findings and potential implications		-
of such findings on the impact of the proposed	Section 1 and 11	
activity, including identified alternatives, on the	Section Fand 11	
environment		
(k) Any mitigation measures for inclusion in the EMPr	Section 1 and 11	-
(I) Any conditions for inclusion in the environmental		-
authorisation	Section 1 and 11	
(m) Any monitoring requirements for inclusion in the		-
EMPr or environmental authorisation	Section 1 and 11	
(n)(i) A reasoned opinion as to whether the proposed	Section 1 and 11	-
activity, activities or portions thereof should be		
authorised and		
(n)(iA) A reasoned opinion regarding the acceptability		-
of the proposed activity or activities; and		
(n)(ii) If the opinion is that the proposed activity,		-
activities or portions thereof should be authorised,		
any avoidance, management and mitigation	Section 1 and 11	
measures that should be included in the EMPr,		
and where applicable, the closure plan		
		Not
		applicable. A
		public
		consultation
		process will
		be conducted
(o) A description of any consultation process that was		as part of the
undertaken during the course of carrying out the		EIA and EMPr
study	N/A	process.
(p) A summary and copies if any comments that were		
received during any consultation process	N/A	-
(q) Any other information requested by the competent		Not
authority.	N/A	applicable.

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section in	where not
Regulations of 7 April 2017	report	applicable.
(2) Where a government notice by the Minister provides for	Section 3 compliance	-
any protocol or minimum information requirement to be	with SAHRA	
applied to a specialist report, the requirements as indicated	guidelines	
in such notice will apply.	94.4311100	

EXECUTIVE SUMMARY

Banzai Environmental was appointed by PGS Heritage (Pty) Ltd to conduct the Palaeontological Desktop Assessment (PDA) to assess the proposed Kalgold Expansion Project (KEP) for Harmony Gold, in the Ratlou Local Municipality within the Ngaka Modiri Molema District Municipality. The proposed development is located between Mafikeng and Vryburg in the North West Province. To comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this Palaeontological Desktop Assessment (part of the Heritage Impact Assessment) is necessary to confirm if fossil material is present in the planned development and to evaluate the impact of the proposed development on the Palaeontological Heritage.

The proposed Kalgold Expansion Project is underlain by the Khunwana and Ferndale Formation of the Kraaipan Greenstone Terrane (Archaean Greenstone Belts) that crops up in the western portion of the development and is mantled by aeolian sand of the Gordonia Formation (Kalahari Group). According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Archaean Greenstone Belts is zero as it is malific in origin while that of the Kalahari Group is moderate.

A LOW Palaeontological Significance has been allocated to the development and it is therefore considered that the construction of the proposed development is deemed and will not lead to detrimental impacts on the palaeontological resources of the area. The construction of the development may be authorised and no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of fossils.

If any fossil remains are discovered during any phase of construction (for the current application), either on the surface or uncovered by excavations the ECO/site manager in charge of these developments must be notified immediately. These discoveries ought to be protected (if possible, *in situ*) and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that correct mitigation (recording and collection) can be carry out by a palaeontologist.

The specialist would need a collection permit from SAHRA. Fossil material must be curated in an approved collection (museum or university) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA

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Appendix A: CV

TERMINOLOGY AND ABBREVIATIONS

Archaeological resources

This includes:

- material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years including artifacts, human and hominid remains, and artificial features and structures;
- rock art is any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic as defined in the Maritimes Zones Act, and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation;
- features, structures, and artifacts associated with a military history which are older than
 75 years and the site on which they are found.

Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance

Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in a change to the nature, appearance or physical nature of a place or influences its stability and future well-being, including:

- construction, alteration, demolition, removal or change in use of a place or a structure at a place;
- carrying out any works on or over or under a place;
- subdivision or consolidation of land comprising a place, including the structures or airspace of a place;
- constructing or putting up for display signs or boards;
- any change to the natural or existing condition or topography of land; and
- any removal or destruction of trees, or removal of vegetation or topsoil

Fossil

Mineralized bones of animals, shellfish, plants, and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

Heritage resources

This means any place or object of cultural significance and can include (but not limited to) as stated under Section 3 of the NHRA,

- places, buildings, structures, and equipment of cultural significance;
- places to which oral traditions are attached or which are associated with living heritage;
- historical settlements and townscapes;
- landscapes and natural features of cultural significance;
- geological sites of scientific or cultural importance;
- archaeological and palaeontological sites;
- graves and burial grounds, and
- sites of significance relating to the history of slavery in South Africa;

Holocene

The most recent geological time period which commenced 10 000 years ago.

Palaeontology

Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

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Table 2: Abbreviations

Abbreviations	Description
ASAP	Association of South African Professional Archaeologists
CRM	Cultural Resource Management
DEA	Department of Environmental Affairs
DIA	Desktop Impact Assessment
ECO	Environmental Control Officer
EIA practitioner	Environmental Impact Assessment Practitioner
EIA	Environmental Impact Assessment
GPS	Global Positioning System
HIA	Heritage Impact Assessment
I&AP	Interested & Affected Party
KEP	Kalgold Expansion Project
LOM	Life of Mine
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
PIA	Palaeontological Impact Assessment
PHRA	Provincial Heritage Resources Authority
PSSA	Palaeontological Society of South Africa
SADC	Southern African Development Community
SAHRA	South African Heritage Resources Agency

1 INTRODUCTION

Environmental Impact Management Services (Pty) Ltd (EIMS) appointed PGS Heritage to conduct the Heritage Impact Assessment for the proposed Kalgold Expansion Project (KEP) between Mafikeng and Vryburg in the North West Province. In turn Banzai Environmental was appointed by PGS Heritage (Pty) Ltd to conduct the **Palaeontological Desktop Assessment** (PDA) for the proposed KEP. The proposed development is located between Mafikeng and Vryburg in the North West Province (**Figure1-3**).

1.1 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This present study has been conducted by Mrs Elize Butler. She has conducted approximately 300 palaeontological impact assessments for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (*cum laude*) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-five years. She has experience in locating, collecting, and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

2 SITE LOCATION AND DESCRIPTION

2.1 LOCALITY AND SITE DESCRIPTION

The existing opencast gold mining operation of Kalgold is situated in the Kraaipan Greenstone Belt some 60 kilometres southwest of Mahikeng in the jurisdiction of Ratlou Local Municipality within the Ngaka Modiri Molema District Municipality in the North West Province (**Figure 1** and **Figure 2**).

The study area spans over four different farms. A portion of each farm has been surveyed where new development for the mine intends to take place

Study Area Coordinates	Northern Point S -26.121134° E 25.246467°	Eastern Point S -26.164429° E 25.279088°
	Southern Point	Western Point
	S -26.184170°	S -26.153210°
	E 25.229827°	E 25.221851°
Location	The study area is located within the Ratlou Local Municipality, in the Ngaka Modiri Molema District Municipality, North-West Province	
Property	Portions of Spanover 549 IO, Spanover 552 IO, Ferndale 554 IO and Goldridge 642 IO	

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Topographic Map 2625AA and 2625AB Camden

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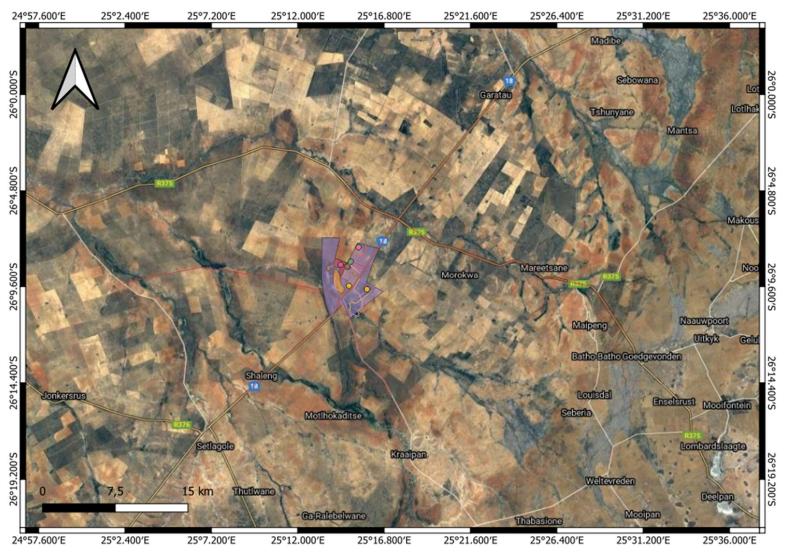


Figure 1:Regional context of the proposed Kalgold Expansion Project for Harmony Gold, in the Ratlou Local Municipality within the Ngaka Modiri Molema District

Municipality.

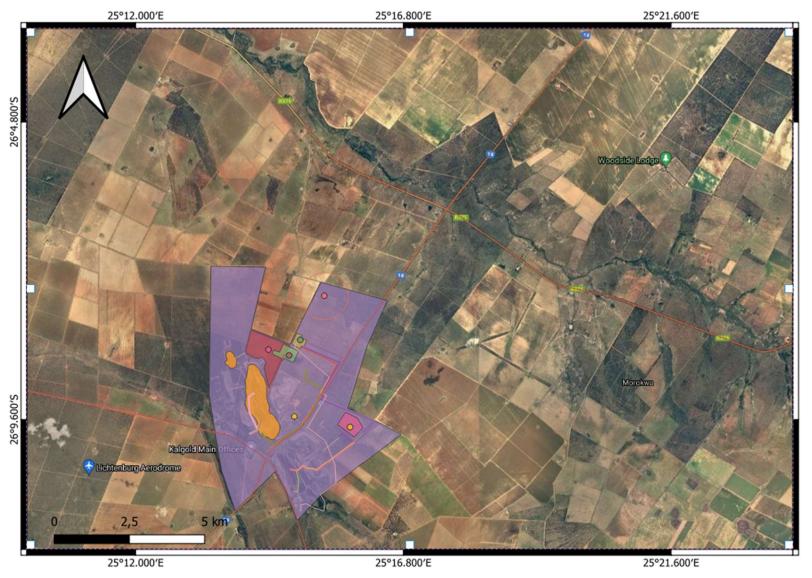


Figure 2: Google Earth (2021) Image of the proposed Kalgold Expansion Project.

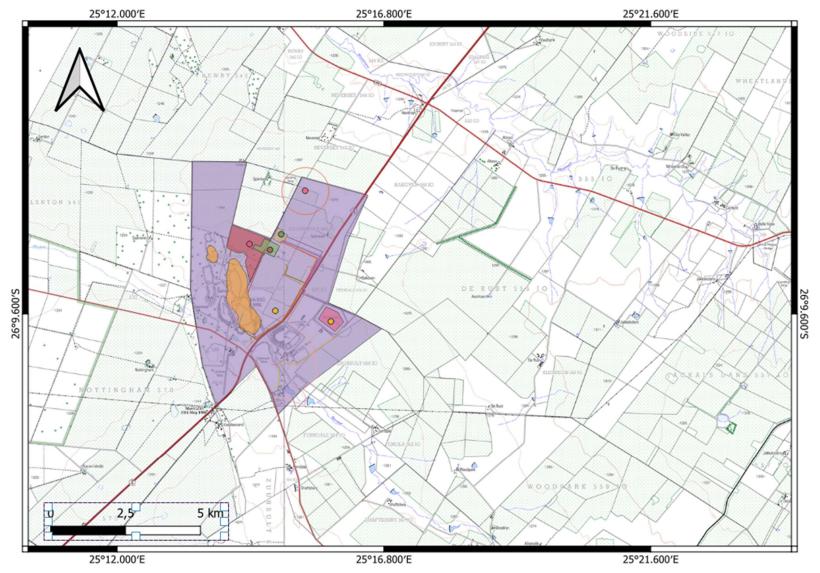


Figure 3: Locality Map of the proposed Kalgold Expansion Project.

2.2 TECHNICAL PROJECT DESCRIPTION

The existing Harmony Kalgold operation wishes to expand its current production from the current production rate of 130 000 tons per month to 300 000 tons per month. A pre-feasibility study has been undertaken. The findings of the pre-feasibility study have concluded that the following new activities and expansions must be provided for (Figure 4):

- 1. The pit footprint will increase.
- 2. Larger dewatering pipelines.
- 3. Extension to Spanover waste rock dump.
- 4. Road from the pit to new ROM pad.
- 5. New ROM pad.
- 6. New plant.
- 7. Recommission old Tailings Storage Facility (TSF) at low deposition rate.
- 8. Increase tailings deposition rate at D-zone pit.
- 9. Install pipeline from Central dam to the new processing plant.
- 10. Install a tailings pipeline from the new processing plant to old TSF and D-zone pit (Pipelines for both deposition and another for return water).
- 11. Install pipeline from old processing plant raw water pond to the new plant (D-zone return water)
- 12. Install two power lines from Ferndale substation to the new processing plant.
- 13. Install a water treatment plant at the new plant.
- 14. Relocate and expand the explosives magazine.
- 15. Additional new road from the plant to the N18.
- 16. New road from pit to ROM pad.
- 17. New road to Spanover waste rock dump extension.
- 18. Increase the size of the water pipe from Azone to Central dam.
- 19. Increase the size of the water pipe from Watertank pit to Central dam.

Kalgold mine is an open pit mining operation located some 60km southwest of Mahikeng in the North West Province. The mine is owned and operated by Harmony Gold, who acquired the mine in 1999. The mine is in the Kraaipan Greenstone Belt, which is part of the large Amalia-Kraaipan Greenstone terrain. The largest ore body is found in the D-Zone, which was mined out by a single pit operation along a strike length of 1 300m and to a depth of approximately 290m below surface. Mining at Kalgold Mine continued at the A-Zone, Windmill and Watertank Open Pits, which are all relatively new opencast operations.

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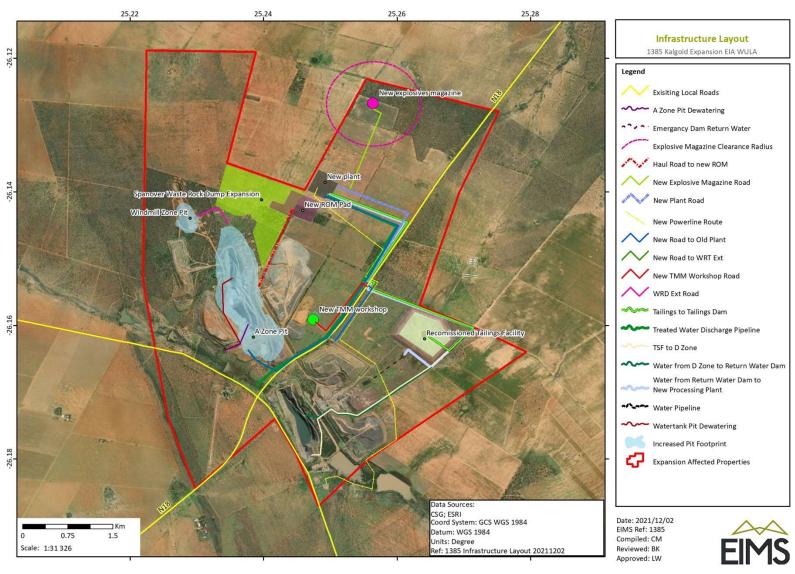


Figure 4 – Kalgold Mine Extension Project Development Plan (Provided by EIMS).

3 LEGISLATION

3.1 NATIONAL HERITAGE RESOURCES ACT (25 OF 1999)

Cultural Heritage in South Africa, includes all heritage resources, is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). Heritage resources as defined in Section 3 of the Act include "all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

The identification, evaluation and assessment of any cultural heritage site, artefact or finds in the South African context is required and governed by the following legislation:

- National Environmental Management Act (NEMA) Act 107 of 1998
- National Heritage Resources Act (NHRA) Act 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act 28 of 2002
- Notice 648 of the Government Gazette 45421- general requirements for undertaking an initial site sensitivity verification where no specific assessment protocol has been identified.

The next section in each Act is directly applicable to the identification, assessment, and evaluation of cultural heritage resources.

GNR 982 (Government Gazette 38282, 14 December 2014) promulgated under the National Environmental Management Act (NEMA) Act 107 of 1998

- Basic Assessment Report (BAR) Regulations 19 and 23
- Environmental Impacts Assessment (EIA) Regulation 23
- Environmental Scoping Report (ESR) Regulation 21
- Environmental Management Programme (EMPr) Regulations 19 and 23

National Heritage Resources Act (NHRA) Act 25 of 1999

- Protection of Heritage Resources Sections 34 to 36
- Heritage Resources Management Section 38

MPRDA Regulations of 2014

Environmental reports to be compiled for application of mining right – Regulation 48

- Contents of scoping report Regulation 49
- Contents of environmental impact assessment report Regulation 50
- Environmental management programme Regulation 51
- Environmental management plan Regulation 52

The NEMA (No 107 of 1998) states that an integrated EMP should (23:2 (b)) "...identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage".

In agreement with legislative requirements, EIA rating standards as well as SAHRA policies the following comprehensive and legally compatible PIA report have been compiled.

Palaeontological heritage is exceptional and non-renewable and is protected by the NHRA. Palaeontological resources and may not be unearthed, broken moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.

This Palaeontological Impact assessment forms part of the Heritage Impact Assessment (HIA) and adhere to the conditions of the Act. According to Section 38 (1), a HIA is required to assess any potential impacts to palaeontological heritage within the development footprint where:

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length;
- the construction of a bridge or similar structure exceeding 50 m in length;
- any development or other activity which will change the character of a site—
- (exceeding 5 000 m² in extent; or
- involving three or more existing erven or subdivisions thereof; or
- involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority
- the re-zoning of a site exceeding 10 000 m² in extent;
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

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4 **OBJECTIVE**

The aim of a Palaeontological Impact Assessment (PIA) is to decrease the effect of the development on potential fossils at the development site.

According to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the purpose of the PIA are: 1) to identify the palaeontological importance of the rock formations in the footprint; 2) to evaluate the palaeontological magnitude of the formations; 3) to determine the impact on fossil heritage; and 4) to recommend how the property developer should guard against and lessen damage to fossil heritage. The terms of reference of a PIA are as follows:

General Requirements:

- Adherence to the content requirements for specialist reports in accordance with Appendix 6 of the EIA Regulations 2014, as amended.
- Adherence to all applicable best practice recommendations, appropriate legislation and authority requirements.
- Submit a comprehensive overview of all appropriate legislation, guidelines.
- Description of the proposed project and provide information regarding the developer and consultant who commissioned the study.
- Description and location of the proposed development and provide geological and topographical maps.
- Provide Palaeontological and geological history of the affected area.
- Identification sensitive areas to be avoided (providing shapefiles/kml's) in the proposed development.
- Evaluation of the significance of the planned development during the Pre-construction, Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:
 - a. Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
 - b. Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity.
 - c. Cumulative impacts result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development; and Implications of specialist findings for the proposed development (such as permits, licenses etc).

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5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The geology of the proposed Kalgold Expansion Project between Mafikeng and Vryburg in the North West Province is depicted on the 1:250 000 2624 Vryburg Geological Map (1993) (Council of Geoscience, Pretoria) (Figure 4). The proposed development is underlain by the Khunwana and Ferndale Formation of the Kraaipan Greenstone Terrane (Archaean Greenstone Belts) in the west and by aeolian sand (Qg) of the Gordonia Formation (Kalahari Group).

The Kraaipan Greenstone Terrane consists of the Khunwana, Ferndale and Gold Ridge Formations). Only the two younger Formations (Khunwana and Ferndale) is present in the study area. This Terrane crop up south of Botswana in three narrow, discontinuous, NNW trending successions. These successions are spaced with 30-40-km intervals and are mantled by a thick surficial deposit (aeolian sand, of the Gordonia Formation Qg, Kalahari Group). The Madibe Belt is situated in the east (Hirner, 2001), the central Kraaipan Belt (type locality of the Kraaipan Group) provides the most continuous stratigraphic succession, while the Stella Belt is the most western Belt. The Kraaipan Succession comprises mainly of mafic volcanic rocks with subordinate ironformation and schist (Du Toit, 1906, 1908).

The Ferndale Formation consists of laminated jaspillitic and ferruginous chert, with interlayered felsic volcanic rocks. The cherts are folded, and frequently show local zones of brecciation. The volcanics are rhyolitic in structure and consists of fine sericite and plagioclase with minor chlorite as well as quartz. The Ferndale Formation is overlain by the Khunwana Formation, which is lithologically comparable to the basal Gold Ridge Formation. The mafic metavolcanic rocks are in places strongly amygdaloidal and display pillow structures. These sediments are approximately 3070 Ma (Million years old) and unfossiliferous.

The study area is mostly underlain by the Gordonia Formation of the Kalahari Group. The Kalahari deposits is approximately Ca 65 – 2.5 million years old (Ma). Tertiary Calcrete is also present close to the development. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Gordonia Formation of the Kalahari Group is moderate while the Palaeontological Sensitivity of the Archaean Greenstone Belts (Ferndale and Khunwana Formation) are insignificant (Almond and Pether 2008, SAHRIS website).

The Cenozoic Kalahari Group is the most widespread body of terrestrial sediments in southern Africa. The Cenozoic sands and calcretes of the Kalahari Group range in thickness from a few metres to more than 180m (Partridge et al., 2006). The youngest formation of the Kalahari group is the Gordonia Formation which is generally termed Kalahari sand and comprises of red aeolian sands that covers most of the Kalahari Group sediments. The pan sediments of the area originated from the Gordonia Formation and contains white to brown fine-grained silts, sands and clays. Some of the pans consist of clayey material mixed with evaporates that shows seasonal effects of shallow

12 January 2022 Page 11 saline groundwaters. Quaternary alluvium, aolian sands, surface limestone, silcrete, and terrace gravels are also included in the Kalahari Group (Kent 1980).

Partridge *et al.*, (2006) describes numerous types of superficial deposits of Late Caenozoic (Miocene to Pliocene to Recent) age throughout the Karoo Basin. Sands and gravel in the development footprint has a possible fluvial origin. The fossil assemblages of the Kalahari are generally very low in diversity and occur over a wide range and thus the palaeontological diversity of this Group is low (SAHRIS website). These fossils represent terrestrial plants and animals with a close resemblance to living forms. Fossil assemblages include bivalves, diatoms, gastropod shells, ostracods and trace fossils. The palaeontology of the Quaternary superficial deposits has been relatively neglected in the past. Late Cenozoic calcrete may comprise of bones, horn corns as well as mammalian teeth. Tortoise remains have also been uncovered as well as trace fossils which includes termite and insect's burrows and mammalian trackways. Amphibian and crocodile remains have been uncovered where the depositional settings in the past were wetter.

Almond and Pether 2008 allocated a low significance to the Kalahari Group because fossil assemblages are generally rare and low in diversity and occur over a wide-ranging geographic area. In the past palaeontologists did not focus on Cenozoic superficial deposits although they sometimes comprise of significant fossil biotas. However, Groenewald and Groenewald (2014) allocated a high palaeontological sensitivity to the Cenozoic aged terrestrial organisms which are important indicators of palaeo-environmental conditions.

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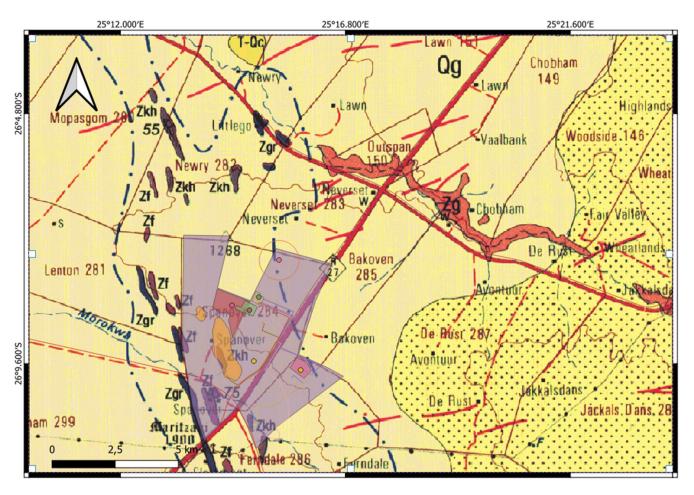


Figure 5: Extract of the 1:250 000 2624 Vryburg Geological Map (1993) (Council of Geoscience, Pretoria) indicating the geology of the proposed development in purple. The development is underlain by the Aeolian Sand (yellow, Qg) of the Gordonia Formation (Kalahari Group) as well as the underlain by the Ferndale (Zf) and (Zkh) of the Kraaipan Greenstone Terrane (Archaean Greenstone Belts).

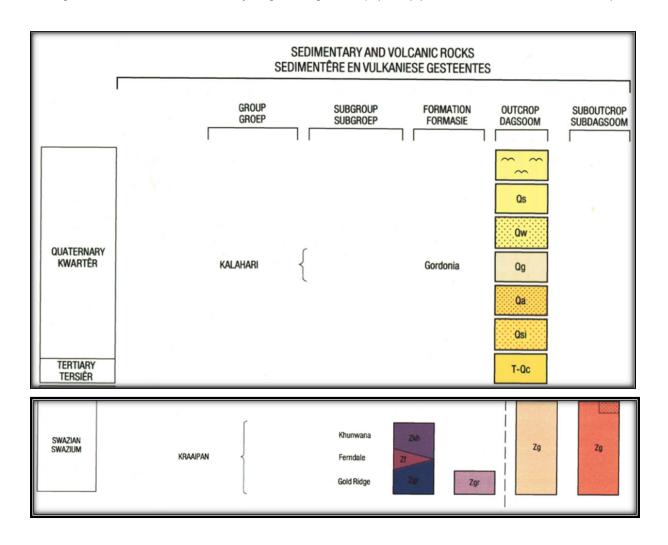


Table 3: Geology of development as well as surrounding areas. Sediments present in the development is indicated in bold.

Abbreviation	Group/Formation (Fm)	Lithology
Qg	Quaternary; Gordonia Formation, Kalahari	Shale, shaly sandstone, grit,
	Group	conglomerate, sandstone,
		coal in places near the
		bottom and top
Qw	Quaternary	Undifferentiated aeolian
		sands
T-Qc	Quaternary	Calcrete
Zkh	Kunwana Formation Kraaipan Greenstone	Branded grey chert, brown
	Terrane (Archaean Greenstone Belts	jaspilite, amphibolite, lava,
		chlorite schist
Zf	Ferndale Formation, Kraaipan Greenstone	Variegated banded jaspilite
	Terrane (Archaean Greenstone Belts	

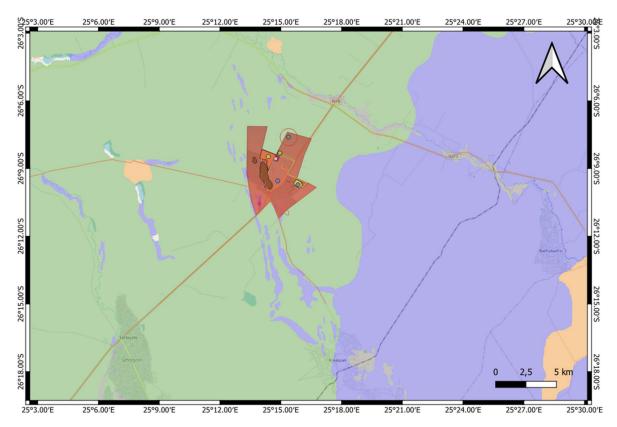


Figure 6: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences).

According to the SAHRIS Palaeosensitivity map (**Figure 5**) the proposed development is underlain by sediments with a Low (blue) and Moderate (green) Palaeontological Sensitivity.

The colours on the PalaeoMap indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero

Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is
		required
ORANGE/YELLOW	HIGH	desktop study is required and based on the
		outcome of the desktop study; a field assessment
		is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however
		a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop
		study. As more information comes to light, SAHRA
		will continue to populate the map.

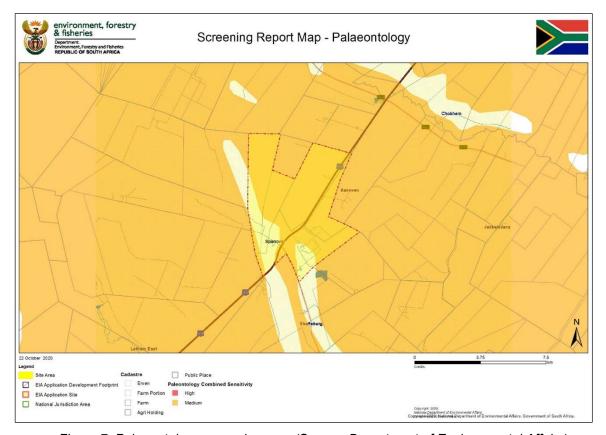


Figure 7: Palaeontology screening map (Source: Department of Environmental Affairs).

6 GEOGRAPHICAL LOCATION OF THE SITE

Kalgold gold mine is located on Portions of Spanover 549 IO, Spanover 552 IO, Ferndale 554 IO and Goldridge 642 IO in the Kraaipan Greenstone Belt. The development is approximately 50 kilometres southwest of Mahikeng in the Ratlou Local Municipality within the Ngaka Modiri Molema District Municipality in the North West Province (Error! Reference source not found.).

Study Area Coordinates	Northern Point S -26.121134° E 25.246467°	Eastern Point S -26.164429° E 25.279088°
	Southern Point S -26.184170° E 25.229827°	Western Point S -26.153210° E 25.221851°

7 METHODS

A desktop study was assembled to evaluate the possible risk to palaeontological heritage (this includes fossils as well as trace fossils) in the proposed development area. In compiling the desktop report aerial photos, Google Earth 2018, topographical and geological maps and other reports from the same area as well as the author's experience were used to assess the proposed development footprint.

8 ASSUMPTIONS AND LIMITATIONS

The accuracy of the Desktop Impact Assessment (DIA) is reduced by several factors which may include the following: the databases of institutions are not always up to date and relevant locality and geological information were not accurately documented in the past. Various remote areas of South Africa have not been assessed by palaeontologists and data is based on aerial photographs alone. Geological maps concentre on the geology of an area and the sheet explanations were never intended to focus on palaeontological heritage.

Similar Assemblage Zones, but in different areas is used to provide information on the presence of fossil heritage in an unmapped area. Desktop studies of similar geological formations and Assemblage Zones generally **assume** that exposed fossil heritage is present within the development area. The accuracy of the Palaeontological Impact Assessment is thus improved considerably by conducting a field-assessment.

9 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- The Palaeosensitivity Map from the SAHRIS website.
- 1:50000 2625AA and 2625AB Camden Topographical maps
- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)

- Geological Map 1: 250 000 2624 Vryburg Geological Map (1993) (Council of Geoscience, Pretoria).
- A Google Earth map with polygons of the proposed development was obtained from PGS.

10 IMPACT ASSESSMENT METHODOLOGY

The impact significance rating methodology, as provided by EIMS, is guided by the requirements of the NEMA EIA Regulations 2014 (as amended). The broad approach to the significance rating methodology is to determine the environmental risk (ER) by considering the consequence (C) of each impact (comprising Nature, Extent, Duration, Magnitude, and Reversibility) and relate this to the probability/ likelihood (P) of the impact occurring. This determines the environmental risk. In addition, other factors, including cumulative impacts and potential for irreplaceable loss of resources, are used to determine a prioritisation factor (PF) which is applied to the ER to determine the overall significance (S). The impact assessment will be applied to all identified alternatives. Where possible, mitigation measures will be recommended for the impacts identified.

10.1 DETERMINATION OF ENVIRONMENTAL RISK

The significance (S) of an impact is determined by applying a prioritisation factor (PF) to the environmental risk (ER). The environmental risk is dependent on the consequence (C) of the particular impact and the probability (P) of the impact occurring. The consequence is determined through the consideration of the Nature (N), Extent (E), Duration (D), Magnitude (M), and reversibility (R) applicable to the specific impact.

For the purpose of this methodology, the consequence of the impact is represented by:

$$C = (E+D+M+R) \times N$$

Each individual aspect in the determination of the consequence is represented by a rating scale as defined in Table 4 below.

Table 4 - Criteria for Determining Impact Consequence

Aspect	Score	Definition
Nature - 1		Likely to result in a negative/ detrimental impact
	+1	Likely to result in a positive/ beneficial impact
Extent	1	Activity (i.e. limited to the area applicable to the specific activity)
	2	Site (i.e. within the development property boundary),
3 4		Local (i.e. the area within 5 km of the site),
		Regional (i.e. extends between 5 and 50 km from the site
	5	Provincial / National (i.e. extends beyond 50 km from the site)
Duration 1		Immediate (<1 year)
	2	Short term (1-5 years),

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Aspect	Score	Definition
	3	Medium term (6-15 years),
	4	Long term (the impact will cease after the operational life span of the
		project),
	5	Permanent (no mitigation measure of natural process will reduce the impact
		after construction).
Magnitude/	1	Minor (where the impact affects the environment in such a way that natural,
Intensity		cultural and social functions and processes are not affected),
	2	Low (where the impact affects the environment in such a way that natural,
		cultural and social functions and processes are slightly affected),
	3	Moderate (where the affected environment is altered but natural, cultural
		and social functions and processes continue albeit in a modified way),
	4	High (where natural, cultural or social functions or processes are altered to
		the extent that it will temporarily cease), or
	5	Very high / don't know (where natural, cultural or social functions or
		processes are altered to the extent that it will permanently cease).
Reversibility	1	Impact is reversible without any time and cost.
	2	Impact is reversible without incurring significant time and cost.
	3	Impact is reversible only by incurring significant time and cost.
	4	Impact is reversible only by incurring prohibitively high time and cost.
	5	Irreversible Impact

Once the C has been determined, the ER is determined in accordance with the standard risk assessment relationship by multiplying the C and the P. Probability is rated/ scored as per Error! Reference source not found.9.

Table 5 - Probability Scoring

	1	Improbable (the possibility of the impact materialising is very low as a result of design, historic experience, or implementation of adequate corrective actions; <25%),
ility	2	Low probability (there is a possibility that the impact will occur; >25% and <50%),
Probabil	3	Medium probability (the impact may occur; >50% and <75%),
•	4	High probability (it is most likely that the impact will occur- > 75% probability), or
	5	Definite (the impact will occur)

The result is a qualitative representation of relative ER associated with the impact. ER is therefore calculated as follows:

ER= C x P

Table 6 - Determination of Environmental Risk

an	5	5	10	15	20	25
Sec	4	4	8	12	16	20
<u>~</u> _	3	3	6	9	12	15
ပိ	2	2	4	6	8	10

Probability	'		'	'	
0	1	2	3	4	5
1	1	2	3	4	5

The outcome of the environmental risk assessment will result in a range of scores, ranging from 1 through to 25. These ER scores are then grouped into respective classes as described in **Table 7**.

Table 7 - Significance Classes

Environmental Risk Score		
Value	Description	
< 9	Low (i.e. where this impact is unlikely to be a significant environmental risk).	
≥9 - <17	Medium (i.e. where the impact could have a significant environmental risk),	
≥17	High (i.e. where the impact will have a significant environmental risk).	

The impact ER will be determined for each impact without relevant management and mitigation measures (pre-mitigation), as well as post-implementation of relevant management and mitigation measures (post-mitigation). This allows for a prediction in the degree to which the impact can be managed/mitigated.

10.2 IMPACT PRIORITISATION

Further to the assessment criteria presented in the section above, it is necessary to assess each potentially significant impact in terms of:

- 1. Cumulative impacts; and
- 2. The degree to which the impact may cause irreplaceable loss of resources.

To ensure that these factors are considered, an impact prioritisation factor (PF) will be applied to each impact ER (post-mitigation). This prioritisation factor does not aim to detract from the risk ratings but rather to focus the attention of the decision-making authority on the higher priority/significance issues and impacts. The PF will be applied to the ER score based on the assumption that relevant suggested management/mitigation impacts are implemented.

Table 8 - Criteria for Determining Prioritisation

	Low (1)	Considering the potential incremental, interactive, sequential, and
		synergistic cumulative impacts, it is unlikely that the impact will
Cumulative		result in spatial and temporal cumulative change.
Impact (CI)	Medium (2)	Considering the potential incremental, interactive, sequential, and
		synergistic cumulative impacts, it is probable that the impact will
		result in spatial and temporal cumulative change.

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	High (3)	Considering the potential incremental, interactive, sequential, and synergistic cumulative impacts, it is highly probable/ definite that the impact will result in spatial and temporal cumulative change.
	Low (1)	Where the impact is unlikely to result in irreplaceable loss of resources.
Loss of Resources (LR)	Medium (2)	Where the impact may result in the irreplaceable loss (cannot be replaced or substituted) of resources but the value (services and/or functions) of these resources is limited.
	High (3)	Where the impact may result in the irreplaceable loss of resources of high value (services and/or functions).

The value for the final impact priority is represented as a single consolidated priority, determined as the sum of each individual criteria represented in Table 5. The impact priority is therefore determined as follows:

Priority = CI + LR

The result is a priority score which ranges from 3 to 9 and a consequent PF ranging from 1 to 2 (Refer to **Table 9**).

Table 9 - Determination of Prioritisation Factor

Priority Ranking		Prioritisation Factor	
2	Low	1	
3	Medium	1.125	
4	Medium	1.25	
5	Medium	1.375	
6	High	1.5	

In order to determine the final impact significance, the PF is multiplied by the ER of the post-mitigation scoring. The ultimate aim of the PF is an attempt to increase the post-mitigation environmental risk rating by a full ranking class if all the priority attributes are high (i.e. if an impact comes out with a medium environmental risk after the conventional impact rating, but there is significant cumulative impact potential and significant potential for irreplaceable loss of resources, then the net result would be too upscale the impact to a high significance).

Table 10 - Final Environmental Significance Rating

	Environmental Significance Rating
Value	Description

< -17	High negative (i.e. where the impact must have an influence on the decision process to develop in the area).
≥ -17 ≤ -9	Medium negative (i.e. where the impact could influence the decision to develop in the area).
> -9, <0	Low negative (i.e. where this impact would not have a direct influence on the decision to develop in the area).
0	No impact
<0, <9	Low positive (i.e. where this impact would not have a direct influence on the decision to develop in the area).
≥ 19 ≤ 17	Medium positive (i.e. where the impact could influence the decision to develop in the area).
≥ 217	High positive (i.e. where the impact must have an influence on the decision process to develop in the area).

The significance ratings and additional considerations applied to each impact will be used to provide a quantitative comparative assessment of the alternatives being considered. In addition, professional expertise and opinion of the specialists and the environmental consultants will be applied to provide a qualitative comparison of the alternatives under consideration. This process will identify the best alternative for the proposed project.

10.3 HERITAGE IMPACTS

The PDA has determine that the palaeontological potential of the underlaying geology is of low significance

Table 11 indicates the rating of the possible impacts and the overall impact inclusive of cumulative impact is low. The possibility of chance finds of unidentified heritage resources, can be mitigated through the proposed management measures contained in the next section so this report.

Table 11 - Impact rating for heritage resources

DES	Pre-Mitigation						Post Mitigation							Priority Crite						
Identifier	Impact	Nature	Extent	Duration	Magnitude	Reversibility	Probability	Pre- mitigation ER	Nature	Extent	Duration	Magnitude	Reversibility	Probability	Post- mitigation ER	Confidence	Cumulative Impact	Irreplaceabl e loss	Priority Factor	Final score
10.1.1	Impact on palaeontol ogy	-1	2	5	3	5	3	-11,25	-1	1	5	1	5	1	-3	High	1	1	1.00	-1.5

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10.4 SUMMARY OF IMPACT TABLES

The significance and extent of the possible impact on palaeontological resources is rated as having a medium impact however with the implementation of the recommendations in this report it can be mitigated to a low rating.

11 FINDINGS AND RECOMMENDATIONS

The proposed Kalgold Expansion Project is underlain by the Ferndale and Kunwana Formation of the Kraaipan Greenstone Terrane (Archaean Greenstone Belts) that crops up in the east and is mantled by Aeolian sand of the Gordonia Formation (Kalahari Group). According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Archaean Greenstone Belts is zero as it is malific in origin while that of the Kalahari Group is moderate.

A LOW Palaeontological Significance has been allocated to the development and it is therefore considered that the construction of the proposed development is deemed appropriate and feasible and will not lead to detrimental impacts on the palaeontological resources of the area. The construction of the development may be authorised and no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of fossils.

If any fossil remains are discovered during any phase of construction (for the current application), either on the surface or uncovered by excavations the ECO/site manager in charge of these developments must be notified immediately. These discoveries ought to be protected (if possible, *in situ*) and the ECO must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that correct mitigation (recording and collection) can be carry out by a palaeontologist.

The specialist would need a collection permit from SAHRA. Fossil material must be curated in an approved collection (museum or university) and all fieldwork and reports should meet the minimum standards for palaeontological impact studies developed by SAHRA.

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