

APPENDIX 4_3

PHASE 1 CULTURAL PALEONTOLOGIC IMPACT ASSESSMENT

**Palaeontological Impact Assessment for the
proposed Feedlot on Farm Demilander 273
between Marquard and Winburg,
Free State Province**

Desktop Study (Phase 1)

For

Spoor Environmental (Pty) Ltd

18 September 2022

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Palaeobotanist

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, mASSAf
Experience: 33 years research and lecturing in Palaeontology
25 years PIA studies and over 300 projects completed

Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Spoor Environmental (Pty) Ltd, South Africa. The views expressed in this report are entirely those of the author and no other interest was displayed during the decision making process for the Project.

Specialist: Prof Marion Bamford

A handwritten signature in blue ink, appearing to read 'MKBamford', with a horizontal line underneath it.

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the Section 24 G application for the rectification for the construction of a cattle feedlot on the Farm Demilander 273, Marquard region, Setsoto Local Municipality, Free State Province. Aluf Farming (Pty) Ltd, located on the farm Demilander 273 in the Marquard region (Figures 1-2) of the Free State, commenced with the construction of a cattle feedlot without obtaining the necessary environmental authorisation.

To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The Feedlot and infrastructure site lies on the potentially very highly sensitive rocks of the Adelaide Subgroup that might preserve vertebrate bones of therapsids and reptiles, fish or plants of the Glossopteris flora. None of these fossils, however, has been recorded from this or surrounding farms. In addition, the soils are deep and have been cultivated for decades. Soils, and particularly ploughed soils, do not preserve any fossils. It is very unlikely that there were any fossils on and that any fossils were damage or destroyed. Based on these factors, it is very unlikely that the palaeontological heritage was impacted adversely and so the application should be granted.

Table of Contents

Expertise of Specialist	1
Declaration of Independence	1
1. Background	4
2. Methods and Terms of Reference.....	7
3. Geology and Palaeontology.....	7
i. Project location and geological context	7
ii. Palaeontological context.....	9
4. Impact assessment.....	10
5. Assumptions and uncertainties.....	11
6. Recommendation.....	12
7. References	12
8. Appendix A - Details of specialist	13
Figure 1: Google Earth map of the general area to show the relative land marks.	6
Figure 2: Google Earth Map of the proposed development	6
Figure 3: Geological map of the area around the project site.....	7
Figure 4: SAHRIS palaeosensitivity map for the site	9

1. Background

As part of the Section 24G application for the rectification for the construction of a cattle feedlot on the Farm Demilander 273, Marquard region, Setsoto Local Municipality, Free State Province, palaeontological impact assessment is required.

Aluf Farming (Pty) Ltd, located on the farm Demilander 273 in the Marquard region (Figures 1-2) of the Free State, commenced with the construction of a cattle feedlot without obtaining the necessary environmental authorisation. Spoor Environmental Services (Pty) Ltd was appointed to submit a Section 24G of NEMA (Act 107 of 1998) rectification application for the unlawful commencement of the cattle feedlot.

In accordance with Section 38 of the NHRA, an independent palaeontological consultant was appointed by Spoor Environmental Services (Pty) Ltd to conduct a palaeontological impact assessment to determine if the construction of the cattle feedlot and associated infrastructure would have an impact on any sites or fossils of palaeontological heritage significance.

To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the recent development and is reported herein.

Table 1: National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA) and Environmental Impact Assessment (EIA) Regulations, 2014 (as amended) - Requirements for Specialist Reports (Appendix 6).

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
ai	Details of the specialist who prepared the report,	Appendix B
a ii	The expertise of that person to compile a specialist report including a curriculum vitae	Appendix B
b	A declaration that the person is independent in a form as may be specified by the competent authority	Page 1
c	An indication of the scope of, and the purpose for which, the report was prepared	Section 1
ci	An indication of the quality and age of the base data used for the specialist report: SAHRIS palaeosensitivity map accessed – date of this report	Yes
cii	A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change	Section 5
d	The date and season of the site investigation and the relevance of the season to the outcome of the assessment	N/A

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
e	A description of the methodology adopted in preparing the report or carrying out the specialised process	Section 2
f	The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	Section 4
g	An identification of any areas to be avoided, including buffers	N/A
h	A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	N/A
i	A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 5
j	A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 4
k	Any mitigation measures for inclusion in the EMPr	Section 8, Appendix A
l	Any conditions for inclusion in the environmental authorisation	N/A
m	Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 8, Appendix A
ni	A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	Section 6
nii	If the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Sections 6, 8
o	A description of any consultation process that was undertaken during the course of carrying out the study	N/A
p	A summary and copies of any comments that were received during any consultation process	N/A
q	Any other information requested by the competent authority.	N/A
2	Where a government notice gazetted by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	N/A

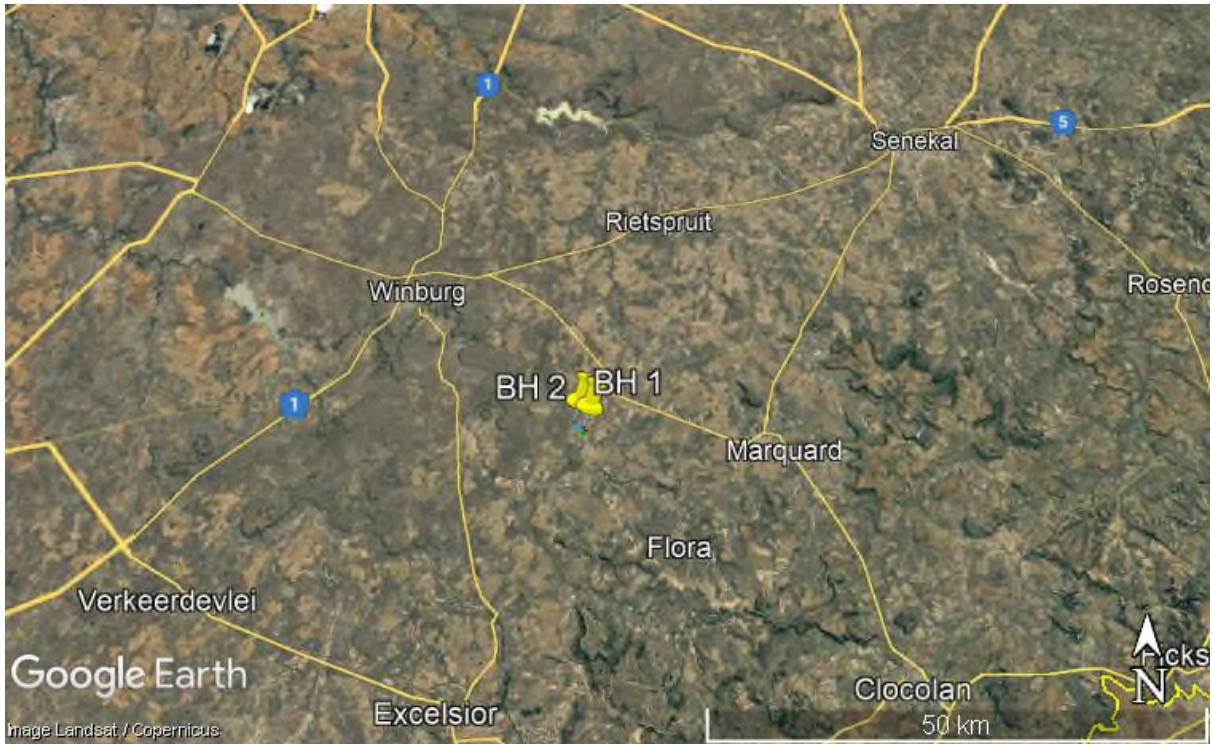


Figure 1: Google Earth map of the general area to show the relative land marks. The proposed feedlot sites are shown by the labelled pins.

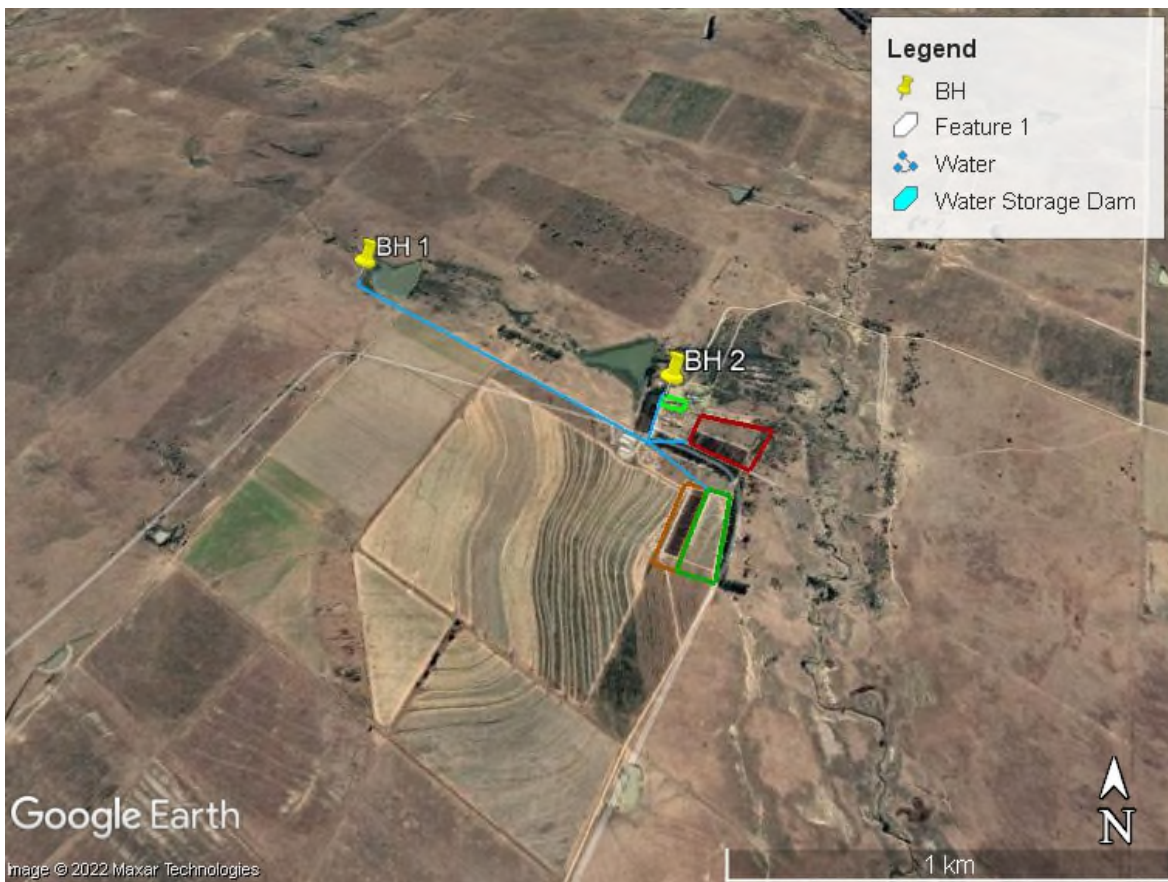


Figure 2: Google Earth Map of the recent feedlot and infrastructure on Farm Demilander 273. BH - boreholes and pipeline (blue), new feedlots (orange and green) and storage dam (red).

2. Methods and Terms of Reference

The Terms of Reference (ToR) for this study were to undertake a PIA and provide feasible management measures to comply with the requirements of SAHRA.

The methods employed to address the ToR included:

1. Consultation of geological maps, literature, palaeontological databases, published and unpublished records to determine the likelihood of fossils occurring in the affected areas. Sources included records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases;
2. Where necessary, site visits by a qualified palaeontologist to locate any fossils and assess their importance (*not applicable to this assessment*);
3. Where appropriate, collection of unique or rare fossils with the necessary permits for storage and curation at an appropriate facility (*not applicable to this assessment*); and
4. Determination of fossils' representivity or scientific importance to decide if the fossils can be destroyed or a representative sample collected (*not applicable to this assessment*).

3. Geology and Palaeontology

i. Project location and geological context

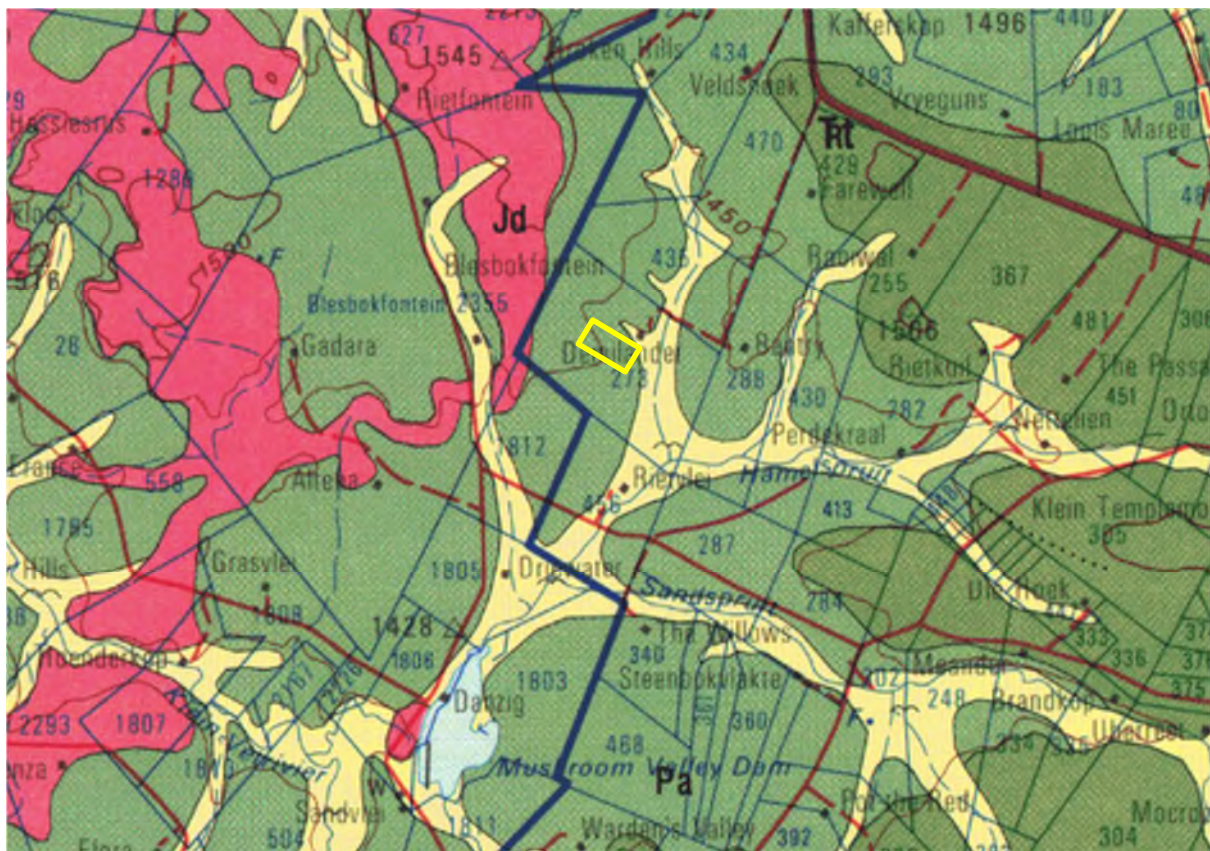


Figure 3: Geological map of the area around the Farm Demilander 273. The location of the proposed project is indicated within the yellow rectangle. Abbreviations of the rock

types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2826 Winburg.

Table 2: Explanation of symbols for the geological map and approximate ages (Johnson et al., 2006; Partridge et al., 2006). SG = Supergroup; Fm = Formation; Ma = million years; grey shading = formations impacted by the project.

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary	Alluvium, sand, calcrete	Neogene, ca 2.5 Ma to present
Jd	Jurassic dykes	Dolerite dykes, intrusive	Jurassic, approx. 183 Ma
Trt	Tarkastad Subgroup, Karoo SG	Mudstone, sandstone	Early-Middle Triassic, ca 253 – 242 Ma
Pa	Adelaide Subgroup, Beaufort Group, Karoo SG	Shale, mudstone, sandstone	Late Permian, ca 256 - 251 Ma

The project lies in the central part of the main Karoo Basin where the upper strata of the Karoo Supergroup are exposed. Along the watercourses much younger transported sands and gravels have accumulated in low energy settings. These are of Quaternary age.

The Karoo Supergroup rocks cover a very large proportion of South Africa and extend from the northeast (east of Pretoria) to the southwest and across to almost the KwaZulu Natal south coast. It is bounded along the southern margin by the Cape Fold Belt and along the northern margin by the much older Transvaal Supergroup rocks. Representing some 120 million years (300 – 183Ma), the Karoo Supergroup rocks have preserved a diversity of fossil plants, insects, vertebrates and invertebrates.

Overlying the basal Dwyka Group rocks are rocks of the Ecca Group that are Early Permian in age. There are eleven formations recognised in this group but they do not all extend throughout the Karoo Basin. Overlying the Ecca Group are the rocks of the Beaufort Group that has been divided into the lower **Adelaide Subgroup** for the Upper Permian strata, and the Tarkastad Subgroup for the Early to Middle Triassic strata. As with the older Karoo sediments, the formations vary across the Karoo Basin.

In this part of the basin, east of 24°E, three formations are recognised in the Adelaide Subgroup, the basal Koonap Formation, the Middleton Formation and the thick Balfour Formation. The latter has been divided into five members, from the base up are the Oudeberg, Daggaboersnek, Ripplemead, Elandsberg and Palingkloof Members. The topmost member is in the Triassic (Rubidge, 2005; Smith et al., 2020).

Large exposures of Jurassic dolerite dykes occur throughout the area. These intruded through the Karoo sediments around 183 million years ago at about the same time as the Drakensberg basaltic eruption. Much younger alluvium and soils overlie the rocks, especially in the watercourses where the sands tend to accumulate

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 4. The site for development is in the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) but it is not known which formation. From the more recent map for biostratigraphy (Fig 2 in Smith et al., 2020) it is likely to be in the *Daptocephalus* Assemblage Zone.

The **Adelaide Subgroup** is part of the eastern foredeep basin and was deposited in the overfilled or non-marine phase (Catuneanu et al., 2005) and so comprises terrestrial deposits. There are numerous fining-upward cycles, abundant red mudrocks and sedimentary structures that indicate deposition under fluvial conditions (Johnson et al., 2006). Some of the lower strata probably represent a subaerial upper delta-plain environment and the generally finer grained materials are typical of meandering rather than braided rivers. Channel deposits are indicated by sandstones while overbank deposits are indicated by the mudstones (Johnson et al., 2006).

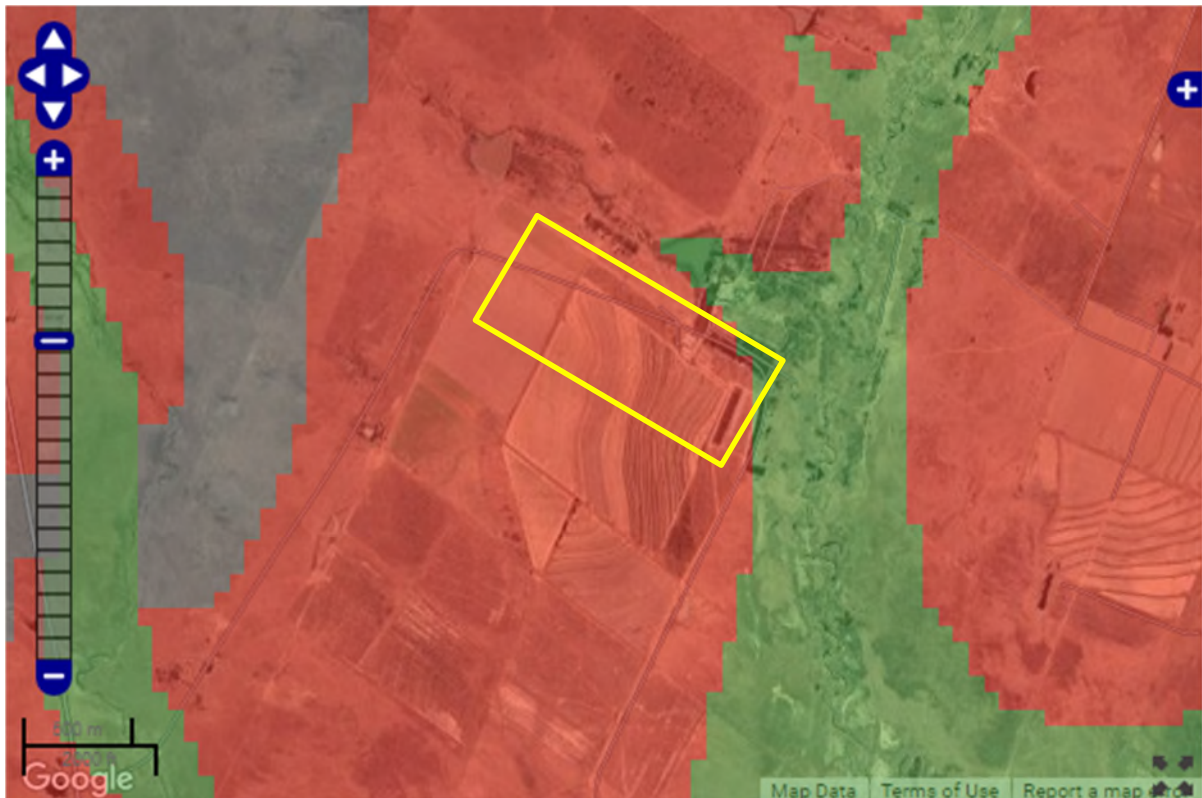


Figure 4: SAHRIS palaeosensitivity map for the site for the proposed feedlot and infrastructure on Farm Demilander 273 shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

The contemporary **Balfour** and **Normandien Formations** are represented by the *Daptocephalus* Assemblage Zone. The **Daptocephalus Assemblage Zone** is recognised by the co-occurrence of the dicynodontoid *Daptocephalus leoniceps*, the therocephalian *Theriongnathus microps*, and the cynodont *Procynosuchus delaharpeae* (Viglietti, 2020).

This has been further divided into two subzones, the lower *Dicynodon -Theriognathus* Subzone (in co-occurrence with *Daptocephalus*), and the upper *Lystrosaurus maccaigi – Moschorhinus kitchingi* Subzone (ibid). Other taxa include fish, amphibians, parareptiles, eureptiles, biarmosuchians, anomodontians, gorgonopsians, therocephaleans, cynodonts and molluscs. The flora is more diverse than the older Assemblage Zones and comprises glossopterids, mosses, ferns, sphenophytes, lycopods, cordaitaleans and gymnosperm woods (Plumstead, 1969; Anderson and Anderson, 1985; Bamford, 2004).

4. Impact assessment

An assessment of the potential impacts to possible palaeontological resources considers the criteria encapsulated in Table 3:

Table 3a: Criteria for assessing impacts

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.
	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	L+	Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	M+	Moderate improvement. Will be within or better than the recommended level. No observed reaction.
	H+	Substantial improvement. Will be within or better than the recommended level. Favourable publicity.
Criteria for ranking the DURATION of impacts	L	Quickly reversible. Less than the project life. Short term
	M	Reversible over time. Life of the project. Medium term
	H	Permanent. Beyond closure. Long term.
Criteria for ranking the SPATIAL SCALE of impacts	L	Localised - Within the site boundary.
	M	Fairly widespread – Beyond the site boundary. Local
	H	Widespread – Far beyond site boundary. Regional/ national
PROBABILITY (of exposure to impacts)	H	Definite/ Continuous
	M	Possible/ frequent
	L	Unlikely/ seldom

Table 3b: Impact Assessment

PART B: Assessment		
SEVERITY/NATURE	H	-
	M	-
	L	Soils do not preserve fossils; so far there are no records from the Adelaide Subgroup of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be negligible
	L+	-
	M+	-
	H+	-
	DURATION	L
M		-
H		Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since the only possible fossils within the area would be fossil vertebrates in the mudstones below the soils, the spatial scale will be localised within the site boundary.
	M	-
	H	-
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any fossils would be found in the loose soils and sands that cover the area or that the excavations for pole foundations would be deep enough to impact the mudstones below ground.

Based on the fact that the new infrastructure is already in place and foundations for poles for the feedlot enclosures and the dam wall have been on the surface in the soils it is highly unlikely that they impacted on any fossils. The drill core diameter for the boreholes is narrow (few cm) although deep and through rocks below ground surface, the chance of them encountering a fossil is extremely small. Although the geological structures suggest that the rocks are the correct age and type to contain fossils, in reality such fossils are very sporadic in occurrence. Taking account of the defined criteria, the potential impact to fossil heritage resources is extremely low.

5. Assumptions and uncertainties

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the dolomites, sandstones, shales and sands are typical for the country and some rarely contain fossil plant, insect, invertebrate and vertebrate material. The overlying soils and sands of the Quaternary period would not preserve fossils.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would have been destroyed by the excavations and borehole drilling. These soils are deep, and the lands have been cultivated or farmed for decades; any rocks were removed a long time ago. In addition, fossils are usually found where there is some degree of topographic relief, and the strata have been cross cut so the layers are exposed. The impact on the palaeontological heritage would have been very unlikely, so as far as the palaeontology is concerned, the Section 24G application should be granted.

7. References

Anderson, J.M., Anderson, H.M., 1985. Palaeoflora of Southern Africa: Prodrum of South African megaflores, Devonian to Lower Cretaceous. A.A. Balkema, Rotterdam. 423 pp.

Bamford, M.K. 2004. Diversity of woody vegetation of Gondwanan southern Africa. *Gondwana Research* 7, 153-164.

Catuneanu, O., Wopfner, H., Eriksson, P.G., Cairncross, B., Rubidge, B.S., Smith, R.M.H., Hancox, J.P., 2005. The Karoo basins of south-central Africa. *Journal of African Earth Sciences*. 43, 211-253.

Plumstead, E.P., 1969. Three thousand million years of plant life in Africa. *Geological Society of southern Africa, Annexure to Volume LXXII*. 72pp + 25 plates.

Smith, R.M.H., Rubidge, B.S., Day, M.O., Botha, J., 2020. Introduction to the tetrapod biozonation of the Karoo Supergroup. *South African Journal of Geology* 123(2), 131-140.

Viglietti, P.A., 2020. Biostratigraphy of the *Daptocephalus* Assemblage Zone (Beaufort Group, Karoo Supergroup). *South African Journal of Geology* 123, 191-206.

Visser, J.N.J., 1986. Lateral lithofacies relationships in the glaciogene Dwyka Formation in the western and central parts of the Karoo Basin. *Transactions of the Geological Society of South Africa* 89, 373-383.

Visser, J.N.J., 1989. The Permo-Carboniferous Dwyka Formation of southern Africa: deposition by a predominantly subpolar marine icesheet. *Palaeogeography, Palaeoclimatology, Palaeoecology* 70, 377-391.

8. Appendix A – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD July 2022

i) Personal details

Surname : **Bamford**
First names : **Marion Kathleen**
Present employment: Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa
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Fax : +27 11 717 6694
Cell : 082 555 6937
E-mail : marion.bamford@wits.ac.za ;
marionbamford12@gmail.com

ii) Academic qualifications

Tertiary Education: All at the University of the Witwatersrand:
1980-1982: BSc, majors in Botany and Microbiology. Graduated April 1983.
1983: BSc Honours, Botany and Palaeobotany. Graduated April 1984.
1984-1986: MSc in Palaeobotany. Graduated with Distinction, November 1986.
1986-1989: PhD in Palaeobotany. Graduated in June 1990.
NRF Rating: C-2 (1999-2004); B-3 (2005-2015); B-2 (2016-2020); B-1 (2021-2026)

iii) Professional qualifications

Wood Anatomy Training (overseas as nothing was available in South Africa):
1994 - Service d'Anatomie des Bois, Musée Royal de l'Afrique Centrale, Tervuren, Belgium, by Roger Dechamps
1997 - Université Pierre et Marie Curie, Paris, France, by Dr Jean-Claude Koeniguer
1997 - Université Claude Bernard, Lyon, France by Prof Georges Barale, Dr Jean-Pierre Gros, and Dr Marc Philippe

iv) Membership of professional bodies/associations

Palaeontological Society of Southern Africa
Royal Society of Southern Africa - Fellow: 2006 onwards
Academy of Sciences of South Africa - Member: Oct 2014 onwards
International Association of Wood Anatomists - First enrolled: January 1991
International Organization of Palaeobotany – 1993+
Botanical Society of South Africa
South African Committee on Stratigraphy – Biostratigraphy - 1997 - 2016
SASQUA (South African Society for Quaternary Research) – 1997+
PAGES - 2008 –onwards: South African representative

ROCEEH / WAVE – 2008+
INQUA – PALCOMM – 2011+onwards

vii) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
Honours	13	0
Masters	11	3
PhD	11	6
Postdoctoral fellows	15	1

viii) Undergraduate teaching

Geology II – Palaeobotany GEOL2008 – average 65 students per year
Biology III – Palaeobotany APES3029 – average 45 students per year
Honours – Evolution of Terrestrial Ecosystems; African Plio-Pleistocene Palaeoecology;
Micropalaeontology – average 12-20 students per year.

ix) Editing and reviewing

Editor: *Palaeontologia africana*: 2003 to 2013; 2014 – Assistant editor
Guest Editor: *Quaternary International*: 2005 volume
Member of Board of Review: *Review of Palaeobotany and Palynology*: 2010 –
Associate Editor *Open Science UK*: 2021 -
Review of manuscripts for ISI-listed journals: 30 local and international journals
Reviewing of funding applications for NRF, PAST, NWO, SIDA, National Geographic,
Leakey Foundation

x) Palaeontological Impact Assessments

Selected from the past five years only – list not complete:

- Mala Mala 2017 for Henwood
- Modimolle 2017 for Green Vision
- Klippoortjie and Finaalspan 2017 for Delta BEC
- Ledjadja borrow pits 2018 for Digby Wells
- Lungile poultry farm 2018 for CTS
- Olienhout Dam 2018 for JP Celliers
- Isondlo and Kwasobabili 2018 for GCS
- Kanakies Gypsum 2018 for Cabanga
- Nababeep Copper mine 2018
- Glencore-Mbali pipeline 2018 for Digby Wells
- Remhoogte PR 2019 for A&HAS
- Bospoort Agriculture 2019 for Kudzala
- Overlooked Quarry 2019 for Cabanga
- Richards Bay Powerline 2019 for NGT
- Eilandia dam 2019 for ACO
- Eastlands Residential 2019 for HCAC
- Fairview MR 2019 for Cabanga
- Graspan project 2019 for HCAC
- Lielifontein N&D 2019 for EnviroPro
- Skeerpoort Farm Mast 2020 for HCAC

- Vulindlela Eco village 2020 for 1World
- KwaZamakhule Township 2020 for Kudzala
- Sunset Copper 2020 for Digby Wells
- McCarthy-Salene 2020 for Prescali
- VLNR Lodge 2020 for HCAC
- Madadeni mixed use 2020 for EnviroPro
- Frankfort-Windfield Eskom Powerline 2020 for 1World
- Beaufort West PV Facility 2021 for ACO Associates
- Copper Sunset MR 2021 for Digby Wells
- Sannaspos PV facility 2021 for CTS Heritage
- Smithfield-Rouxville-Zastron PL 2021 for TheroServe

xi) Research Output

Publications by M K Bamford up to July 2022 peer-reviewed journals or scholarly books: over 160 articles published; 5 submitted/in press; 10 book chapters.

Scopus h-index = 30; Google scholar h-index = 35; i10-index = 92

Conferences: numerous presentations at local and international conferences.

