



PALAEONTOLOGICAL IMPACT ASSESSMENT FOR THE SEWAGE TREATMENT PACKAGE PLANT FOR THE PROPOSED LUSAKA COMMUNITY HEALTHCARE FACILITY, PHUTHADITJHABA, THABO MOFUSANYANA DISTRICT, FREE STATE PROVINCE

Compiled for:

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Prepared by

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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.

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.

PALAEONTOLOGICAL CONSULTANT:
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SIGNATURE:

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 vita	Appendix A	
(b) A declaration that the person is independent in a form	D " (1)	-
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

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section in	where not
Regulations of 7 April 2017	report	applicable.
(h) A map superimposing the activity including the	Section 5 -	
associated structures and infrastructure on the	Geological and	
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		
activity, including identified alternatives, on the	Section 1 and 11	
environment		
(k) Any mitigation measures for inclusion in the EMPr	Section 12	
(I) Any conditions for inclusion in the environmental		
authorisation	Section 12	
(m) Any monitoring requirements for inclusion in the		
EMPr or environmental authorisation	Section 12	
(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	
received during any consultation process	IN/A	

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section in	where not
Regulations of 7 April 2017	report	applicable.
(q) Any other information requested by the competent		Not
authority.	N/A	applicable.
(2) Where a government notice 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.	Section 3 compliance with SAHRA guidelines	

EXECUTIVE SUMMARY

Banzai Environmental was appointed by GA Environment (Pty) Ltd to conduct the Palaeontological Impact Assessment (PIA) assessing the proposed Sewage Treatment Package Plant for the proposed Lusaka Community Healthcare Facility, Phuthaditjhaba, Thabo Mofusanyana District, Free State Province. This PIA is compiled to comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), to confirm if fossil material could potentially be present in the planned development area and to evaluate the impact of the proposed development on the Palaeontological Heritage.

The proposed development is underlain by the Elliot Formation (Stormberg Group, Karoo Supergroup). According to the South African Heritage Resources Information System, the Palaeontological Sensitivity of the Elliot Formation is Very High. A 1-day site-specific field survey of the development footprint was therefore conducted on foot and by a motor vehicle on 8 March 2022. No fossiliferous outcrops were detected in the development footprint.

An overall medium palaeontological sensitivity is allocated to the development footprint. It is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological reserves of the area and construction of the development may be authorised in its whole extent. No further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

Recommendations:

- The ECO for this project must be informed that sediments of the Elliot Formation of the Karoo Supergroup have a Very High Palaeontological Sensitivity.
- If Palaeontological Heritage is uncovered during surface clearing and excavations the **Chance find Protocol** attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (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 mitigation (recording and collection) can be carried out.
- Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).
- These recommendations should be incorporated into the Environmental Management Plan for the proposed development.

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1 INTRODUCTION

Coega Development Corporation (CDC) proposes the development of a sewage treatment package

plant in Lusaka, Phuthaditjhaba, Thabo Mofutsanyana District, Free State (Figure 1-2). Due to the

inadequate infrastructure in the area a new sewage treatment plant will be constructed to cater for the

planned new clinic.

The following information was provided by GA Environmental

The area around the site for the proposed clinic currently has 150mm diameter pipes installed, running

east and north of the site to a sewer pump station. The pump station is however not in working condition

and has not been for a significant period of time. For this reason, a package plant is being proposed

which will discharge treated wastewater into the nearest natural watercourse (Metsi Matsho Tributary).

CDC is applying for both an Environmental Authorisation and Water Use Authorisation.

The Information received from the design engineers regarding the package plant are as follows:

• Design flow: 18200 I/d

• Peak Flow: 0.6 l/s

The proposed Package Plant will comprise a number of a gravity trunk sewer main pipe, which feeds

into the pre-digestion chamber before it enters the bioreactor. The following basic components are

included in the plant:

• Pre-digestion Chamber

Balancing Chamber

Bioreactor Chamber

Clarifier

Two Disinfection Tanks

Power supply for the pumps

Air Blower Pump

Discharge Pump and Transfer Pump

2 **QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR**

This present study has been conducted by Mrs Elize Butler. She has conducted approximately 300

PIAs for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape,

Northwest, Gauteng, Limpopo, and Mpumalanga Provinces. 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.

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3 LEGISLATION

3.1 National Heritage Resources Act (25 of 1999)

Cultural Heritage in South Africa, including 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)**, an 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
 - o (Exceeding 5 000 m² in extent; or
 - o 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.

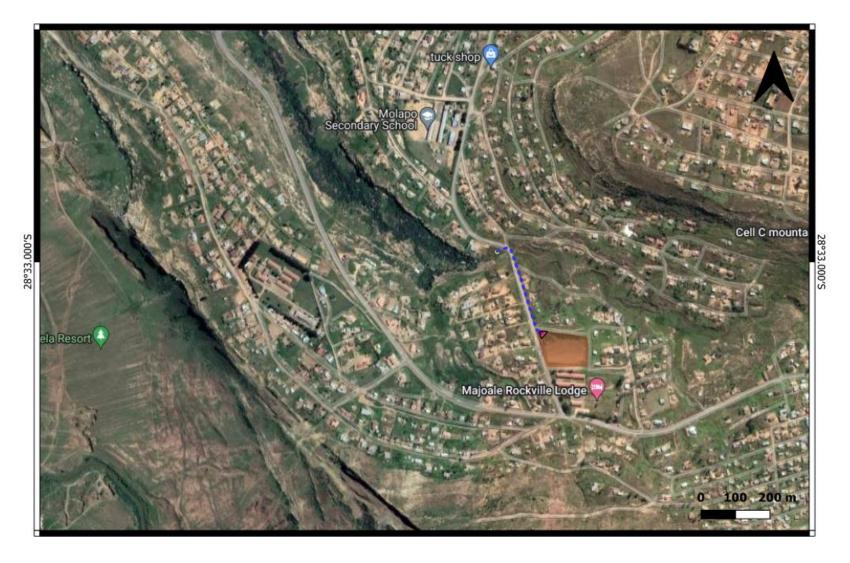


Figure 1: Google Earth Image (2022) indicating the locality of the proposed development of a sewage treatment package plant in Lusaka, Phuthaditjhaba, Thabo Mofutsanyana District, Free State.

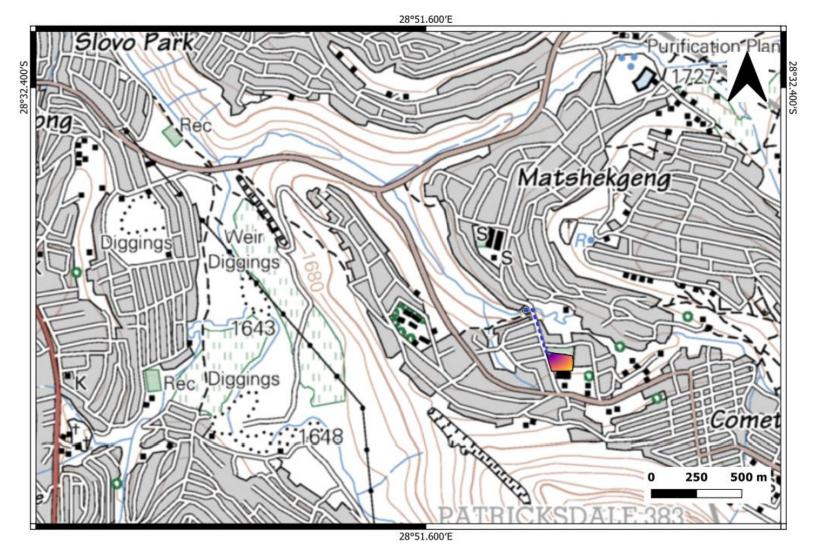


Figure 2: Locality of the proposed development.

4 OBJECTIVE

The aim of a Palaeontological Impact Assessment (PIA) is to minimise the impact 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 is: 1) to identify the palaeontological importance of the rock formations in the footprint; 2) to evaluate the palaeontological magnitude of the formations; 3) to clarify the impact on fossil heritage; and 4) to suggest how the developer might protect and lessen possible damage to fossil heritage.

The palaeontological status of each rock section is calculated as well as the possible impact of the development on fossil heritage by a) the palaeontological importance of the rocks, b) the type of development and c) the quantity of bedrock removed.

When the development footprint has a moderate to high palaeontological sensitivity a field-based assessment is necessary. The desktop and the field survey of the exposed rock determine the impact significance of the planned development and recommendations for further studies or mitigation are made. Destructive impacts on palaeontological heritage usually only occur during the construction phase while the excavations will change the current topography and destruct or permanently seal-in fossils at or below the ground surface. Fossil Heritage will then no longer be accessible for scientific research.

Mitigation usually precede construction or may occur during construction when potentially fossiliferous bedrock is exposed. Mitigation comprises the collection and recording of fossils. Preceding excavation of any fossils a permit from SAHRA must be obtained and the material will have to be housed in a permitted institution. When mitigation is applied correctly, a positive impact as possible because our knowledge of local palaeontological heritage may be increased

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 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 near 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).

5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The proposed development of a sewage treatment package plant in Lusaka, Phuthaditjhaba, Thabo Mofutsanyana District, Free State is depicted on the 1:250 000 Harrismith 2828 Geological Map (1998) (Council of Geosciences, Pretoria) (**Figure 3-4, Table 2**). This map indicates that the proposed development is underlain by the Triassic Elliot Formation (Stormberg Group, Karoo Supergroup). According to the PalaeoMap of the South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Elliot Formation is Very high (Figure 5).

The Elliot formation is known as the red beds of South Africa and is Upper Triassic and Lower Jurassic in age. This succession comprises of immature, fine- to medium-grained sandstones, mudstone, and siltstone. The strong red-purple-maroon diagenetic colouration is primarily argillaceous lithologies and lacks extensive marker beds. The Elliot Formation is 460 to 480m thick in the south of the Basin thinning towards the Free State Drakensberg and KwaZulu-Natal where it varies between 28 and 150m. The formation was generally deposited in a fluviolacustrine environment that consists of two different types of sandstone (lower and upper part of the Formation). These different sandstones formed by different fluvial depositional styles. The upper part of the Formation generally comprises of tabular, multi-storey sheet sandstones and associated facies caused by loessic, aeolian ephemeral, fluvial, and playa lake processes (Visser and Botha,

1980; Eriksson, 1984, 1985; Smith et al., 1993; Bordy et al., 2004b). In the lower part of the Formation the sandstones consist of multi-storey, asymmetrical channelfills. Scientists believe that these sediments were deposits in a perennial, moderately meandering fluvial systems (Botha, 1968; Visser and Botha, 1980; Smith et al., 1993; Bordy et al., 2004b). In the distal Drakensberg regions, the lower part of the Formation diminished in thickness. This part of the Formation is dominated by an association of seasonal to ephemeral anastomosing rivers with loessic floodplain fines, and semi-arid sheetflood deposits (Eriksson, 1984, 1985). The differences in fluvial style were generated by changes in the tectonic setting (like tectonic pulses and associated subsidence) as well as climatic conditions.

The Elliot Formation is represented by two Assemblage Zones. The *Scalenodontoides* Assemblage Zone (SAZ) is present in the Lower Elliot Formation (Stormberg Group, Karoo Supergroup) (Viglietti et al 2020a) while the *Massospondylus* Assemblage Zone (MAZ) is present in the Upper Elliot Formation (Viglietti et al 2020b). The SAZ is known for the traversodontid cynodont *Scalenodontoides macrodontes*, as well as the sauropodomorphs *Blikanasaurus cromptoni* and *Melanorosaurus readi* (Viglietti et al 2020a). The MAZ is the youngest Assemblage Zone tetrapod biozone in the Karoo Basin (upper Stormberg Group, Karoo Supergroup). This AZ is dominated by dinosaurs present in southern Gondwana. The crocodylomorph *Protosuchus haughtoni*, ornithischian *Lesothosaurus diagnosticus* as well as the sauropodomorph *Massospondylus carinatus* (Viglietti et al 2020b).

This Formation is palaeontologically very important as it is known for its early dinosaur fauna that includes prosauropods, the richest known sauropodomorphs (McPhee, McPhee 2017), ornithischians, rare amphibians, turtles, crocodilians and crocodylomorphs, fish, cynodont therapsids and early mammals. Other fossils include crustaceans, insects, woods, and tetrapod trackways (ichnofossils) (Bordy *et al.*, 2015).

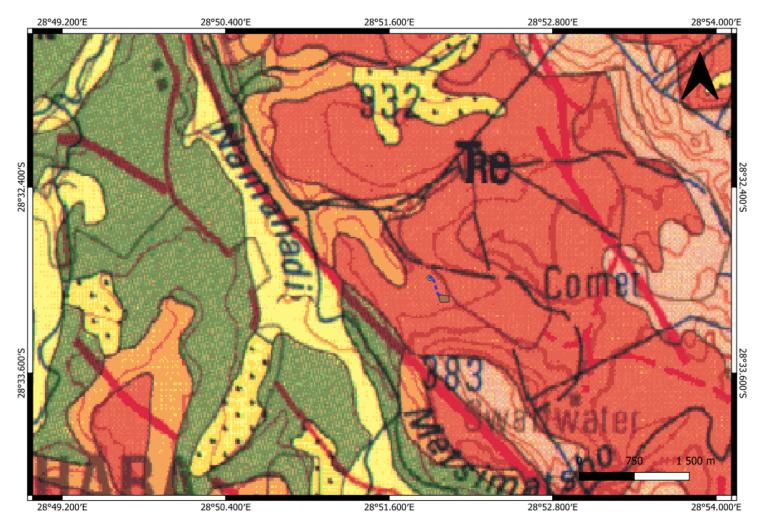
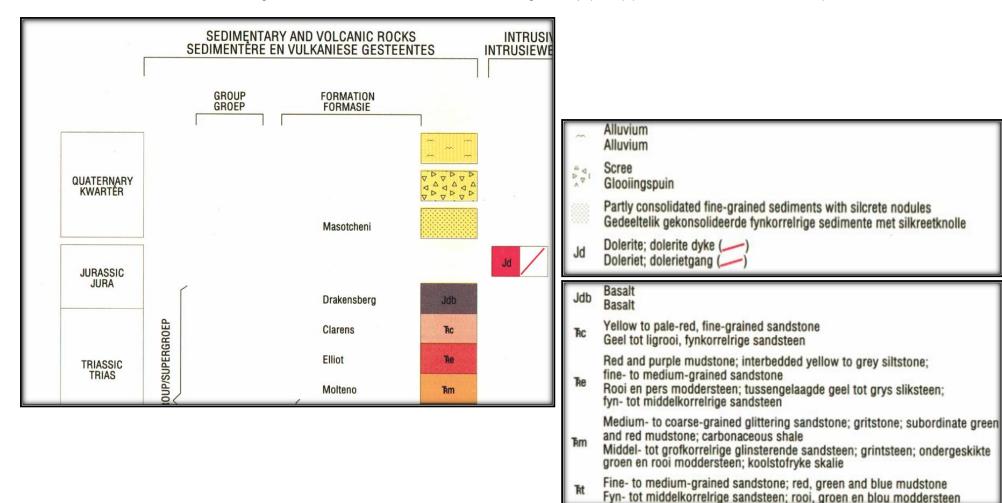


Figure 3: Extract of the 1:250 000 2828 Harrismith Geological map (1998) (Council of Geoscience, Pretoria) indicating the proposed development in blue and brown.

Table 2: Legend of the 1:250 000 Harrismith 2828 Geological map (1998) (Council of Geoscience, Pretoria)



Age	Gp			West of 24° E	East of 24° E			Free State / waZulu-Natal	Vertebrate Assemblage Zones	Vertebrate Subzones			
ည့								Drakensberg Gp	[Orakensberg Gp			
JURASSIC	2G					Clarens Fm		Clarens Fm	Massospondylus				
J.	STORMBERG					upper Elliot Fm	ι	upper Elliot Fm	wassospondylus				
	O					lower Elliot Fm	$\widetilde{}$	ower Elliot Fm	Scalenodontoides				
	S				\sim	Molteno Fm	\sim	Molteno Fm					
ပ		0			$\overline{}$	~~~	\sim	~~~		Cricodon-Ufudocyclops			
SS		lbgr				Burgersdorp Fm		Driekoppen Fm	Cynognathus	Trirachodon-Kannemeyeria			
TRIASSIC		lS p								Langbergia-Gargainia			
TR		Tarkastad Subgp				Katberg Fm	V	erkykerskop Fm	Lystrosaurus declivis				
						Palingkloof M.	_	$\sim\sim$	1				
						Elandsberg M.	_	Harrismith M.					
						Ripplemead M.		Schoondraai M.		Lystrosaurus maccaigi- Moschorhinus			
					four				Daptocephalus				
					Daggaboersnek M.	-	Bal			Schoondraai M. Rooinekke M.	Rooinekke M.		Dicynodon-Theriognathus
			m.	Steenkampsvlakte M.			Ž			Dicyrlodon-Theriognatilus			
	RT	dbqr	oof F	Steenkampsviakte ivi.				Frankfort M.					
	UFO	Adelaide Subgp	Teekloof Fm	Oukloof M.		Oudeberg M.	$\overline{}$	~~~	Cistecephalus				
PERMIAN	BEAUFORT	delai		Hoedemaker M.		Middleton For				Transida eta ma Camanana			
8		A		Poortjie M.	Middleton Fm		Endothiodon	Tropidostoma-Gorgonops					
믮				i corgie ivi.						Lycosuchus-Eunotosaurus			
					Koonap Fm					Tapinocephalus	Diictodon-Styracocephalus		
				Abrahamskraal Fm			Koonap Fm Volksrust Fm			Eosimops-Glanosuchus			
									Eodicynodon				
	CA			Waterford Fm	Waterford Fm								
	ECCA			Tierberg/Fort Brown		Fort Brown							

Figure 4: Vertebrate biozonation range chart for the Main Karoo Basin of South Africa.

Solid lines indicate known ranges, dotted lines indicate suspected but not confirmed ranges, single dot represents the stratigraphic position of the taxa that have only been recovered from a single bed. Wavy lines indicate unconformities. (PLYCSR=Pelycosauria and MAMMFMES+Mammaliaformes. Gp=group, Subgp-Supbroup, Fm=Formation, M=Member. Elliot Formation is indicated by the red arrow.

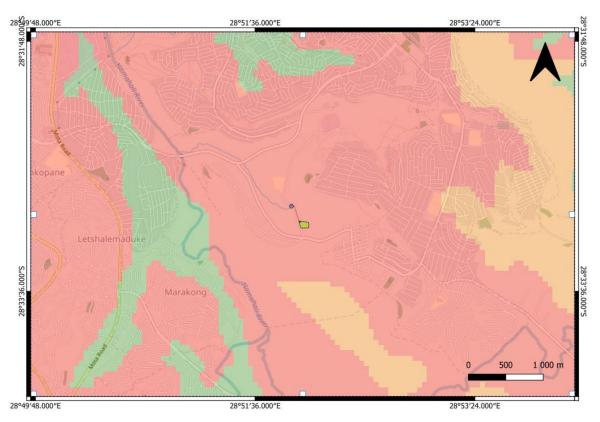


Figure 5: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences).

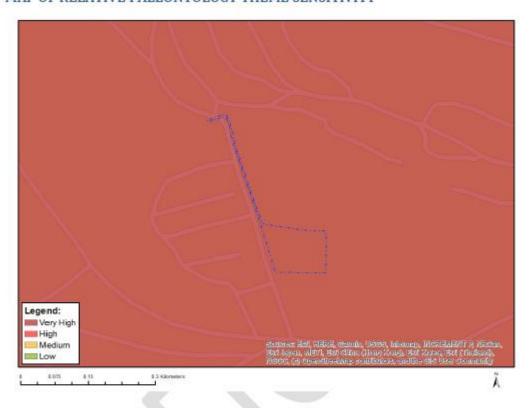
According to the SAHRIS Palaeosensitivity map (**Figure 5**) the proposed development is underlain by sediments with a Very High (Red) Palaeontological Sensitivity.

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

Table 3:Palaeontological Sensitivity

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 becomes known, SAHRA will continue to populate the map.

MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY



Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium paleontological sensitivity
Very High Features with a Very High paleontological sens	

Figure 6: Palaeontological Sensitivity generated by the DFFE Screening

According to the DFFE Screening tool (**Figure 6**) the Sensitivity of the proposed development of a sewage treatment package plant in Lusaka, Phuthaditjhaba, Thabo Mofutsanyana District, Free State is Very High (red).

The SAHRIS PalaeoMap indicates that the proposed development has a Very High (red) Palaeontological Sensitivity that corresponds with that of the DFFE Screening tool.

6 GEOGRAPHICAL LOCATION OF THE SITE

GPS Coordinates

Northern b	border of	f sewage	28°32'59.30"S	28°51'53.90"E
pipeline				
Southern b	border of	f sewage	28°33'5.82"S	28°51'57.92"E
pipeline				
Centre coordinate of the clinic		the clinic	28°33'7.18"S	28°52'0.04"E

7 METHODS

The aim of a desktop study is to evaluate the risk to palaeontological heritage in the proposed development. This includes all trace fossils and fossils. All available information is consulted to compile a desktop study and includes PIA reports in the same area, aerial photos, and Google Earth images, topographical as well as geological maps.

7.1 Assumptions and Limitations

When conducting a PIA, several factors can affect the accuracy of the assessment. The focal point of geological maps is the geology of the area, and the sheet explanations were not meant to focus on palaeontological heritage. Many, inaccessible regions of South Africa have not been reviewed by palaeontologists and data is based on aerial photographs. Locality and geological information of museums and universities databases have not been kept up to date or data collected in the past have not always been accurately documented.

Comparable Assemblage Zones in other areas is used to provide information on the existence of fossils in an area that was not yet been documented. When similar Assemblage Zones and geological formations for Desktop studies is used it is assumed that exposed fossil heritage is present within the footprint.

8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- 1: 250 000 Harrismith 2828 Geological map (1987) (Council of Geoscience, Pretoria)
- A Google Earth map with polygons of the proposed development was obtained from GA Environmental.

9 SITE VISIT

Due to the exceptional high rainfall this summer the proposed development was very overgrown with lush vegetation. A 1-day site-specific field survey of the development footprint was therefore conducted on foot and by a motor vehicle on 8 March 2022. No fossiliferous outcrops were detected in the development footprint.



Figure 7:Northern portion of the proposed sewage pipeline



Figure 8:Centre portion of the proposed sewage pipeline

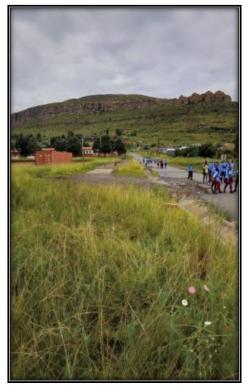


Figure 9:Southern portion of the proposed sewage pipeline



Figure 10: View from the southern margin overlooking the proposed clinic development



Figure 11: View from the western margin overlooking the proposed clinic development

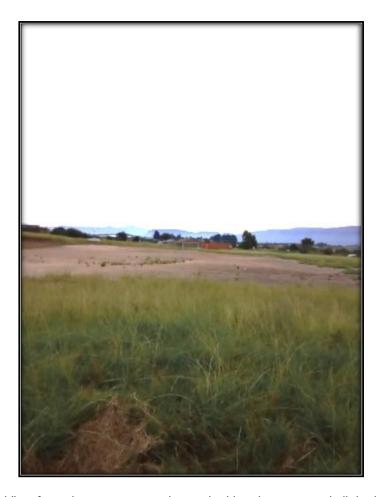


Figure 12: View from the eastern margin overlooking the proposed clinic development

10 IMPACT ASSESSMENT METHODOLOGY

10.1 Impact Rating System

Impact assessment must take account of the nature, scale, and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the following project phases:

- Construction
- Operation
- Decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact, the following criteria is used:

Table 4: The rating system

mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years). Medium term The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years). The impact and its effects will continue or last for the entire operational life of the development but will be	NATU	RE					
This is defined as the area over which the impact will be experienced. Site	Destru	Destruction of fossil Heritage.					
Site	GEOGRAPHICAL EXTENT						
Local/district Will affect the local area or district.	This is	defined as the area over which t	he impact will be experienced.				
Province/region Will affect the entire province or region.	1	Site	The impact will only affect the site.				
A International and National Will affect the entire country. PROBABILITY This describes the chance of occurrence of an impact. 1 Unlikely The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence). 2 Possible The impact may occur (Between a 25% to 50% chance of occurrence). 3 Probable The impact will likely occur (Between a 50% to 75% chance of occurrence). 4 Definite Impact will certainly occur (Greater than a 75% chance of occurrence). DURATION This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity. 1 Short term The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact will last for the period of a relatively short construction period and a limited recovery time after construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years). 2 Medium term The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years). 3 Long term The impact and its effects will continue or last for the entire operational life of the development but will be mitigated by direct human action or by natural processes	2	Local/district	Will affect the local area or district.				
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entire operational life of the development but will be mitigated by direct human action or by natural processes			action or by natural processes thereafter (2 – 10 years).				
mitigated by direct human action or by natural processes	3	Long term	The impact and its effects will continue or last for the				
			entire operational life of the development but will be				
thereafter (10 – 30 years).			mitigated by direct human action or by natural processes				
<u>,</u>			thereafter (10 – 30 years).				

<mark>4</mark>	Permanent	The only class of impact that will be non-transitory.
		Mitigation either by man or natural process will not occur
		in such a way or such a time span that the impact can be
		considered indefinite.
INTEN	ISITY/ MAGNITUDE	
Descri	ibes the severity of an impact.	
1	Low	Impact affects the quality, use and integrity of the
		system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the
		system/component but system/component still continues
		to function in a moderately modified way and maintains
		general integrity (some impact on integrity).
<mark>3</mark>	High	Impact affects the continued viability of the system/
		component, and the quality, use, integrity and
		functionality of the system or component is severely
		impaired and may temporarily cease. High costs of
		rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the
		system/component, and the quality, use, integrity and
		functionality of the system or component permanently
		ceases and is irreversibly impaired. Rehabilitation and
		remediation often impossible. If possible rehabilitation
		and remediation often unfeasible due to extremely high
		costs of rehabilitation and remediation.
REVE	RSIBILITY	
This d	escribes the degree to which a	n impact can be successfully reversed upon completion of the
propos	sed activity.	
1	Completely reversible	The impact is reversible with implementation of minor
		mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation
		measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense
		mitigation measures.
<mark>4</mark>	Irreversible	The impact is irreversible, and no mitigation measures
		exist.
IRREF	PLACEABLE LOSS OF RESO	URCES
This d	escribes the degree to which re	esources will be irreplaceably lost as a result of a proposed
activity	y.	
1	No loss of resource	The impact will not result in the loss of any resources.
	•	

2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.

CUMULATIVE EFFECT

This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.

1	Negligible cumulative impact	The impact would result in negligible to no cumulative				
		effects.				
2	Low cumulative impact	The impact would result in insignificant cumulative				
		effects.				
3	Medium cumulative impact	The impact would result in minor cumulative effects.				
4	High cumulative impact	The impact would result in significant cumulative effects				

SIGNIFICANCE

Impact significance rating

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula:

(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.

The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.

Points	Impact significance rating	Description					
6 to 28	Negative low impact	The anticipated impact will have negligible negative					
		effects and will require little to no mitigation.					
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.					
29 to 50	Negative medium impact	The anticipated impact will have moderate negative					
		effects and will require moderate mitigation measures.					
29 to 50	Positive medium impact	The anticipated impact will have moderate positive					
		effects.					
51 to 73	Negative high impact	The anticipated impact will have significant effects and					
		will require significant mitigation measures to achieve an					
		acceptable level of impact.					
51 to 73	Positive high impact	The anticipated impact will have significant positive					
		effects.					
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects					
		and are unlikely to be able to be mitigated adequately.					
		These impacts could be considered "fatal flaws".					

10.1.1 Summary of Impacts

Only the site will be affected. It is probable that the impact will occur. The expected duration of the impact is assessed as potentially permanent to long term. The impact on fossil heritage will be irreversible and a complete loss of fossil heritage will take place. The cumulative effect of the impact will be low. The magnitude of the impact happening will be Medium.

The Impact significance will therefore be a negative medium Impact.

Site	Probability	Duration	Magnitude	Reversibility	Irreplicable Loss	Cumulative Effect	Significance
1	2	4	2	4	4	2	32

Table 5: Summary of Impacts

11 FINDINGS AND RECOMMENDATIONS FOR THE

The proposed development is underlain by the Elliot Formation (Stormberg Group, Karoo Supergroup). According to the South African Heritage Resources Information System, the Palaeontological Sensitivity of the Elliot Formation is Very High. A 1-day site-specific field survey of the development footprint was therefore conducted on foot and by a motor vehicle on 8 March 2022. No fossiliferous outcrops were detected in the development footprint.

An overall medium palaeontological sensitivity is allocated to the development footprint. It is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological reserves of the area and construction of the development may be authorised in its whole extent. No further palaeontological heritage studies, ground-truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

Recommendations:

- The ECO for this project must be informed that sediments of the Elliot Formation of the Karoo Supergroup have a Very High Palaeontological Sensitivity.
- If Palaeontological Heritage is uncovered during surface clearing and excavations the
 Chance find Protocol attached should be implemented immediately. Fossil discoveries

ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (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 mitigation (recording and collection) can be carried out.

 Before any fossil material can be collected from the development site the specialist involved would need to apply for a collection permit from SAHRA. Fossil material must be housed in an official collection (museum or university), while all reports and fieldwork should meet the minimum standards for palaeontological impact studies proposed by SAHRA (2012).

These recommendations should be incorporated into the Environmental Management Plan for the proposed development..

12 CHANCE FINDS PROTOCOL

A following procedure will only be followed if fossils are uncovered during excavation.

12.1 Legislation

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

Palaeontological heritage is unique and non-renewable and is protected by the NHRA and are the property of the State. It is thus the responsibility of the State to manage and conserve fossils on behalf of the citizens of South Africa. Palaeontological resources may not be excavated, 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.

12.2 Background

A fossil is the naturally preserved remains (or traces) of plants or animals embedded in rock. These plants and animals lived in the geologic past millions of years ago. Fossils are extremely rare and irreplaceable. By studying fossils, it is possible to determine the environmental conditions that existed in a specific geographical area millions of years ago.

12.3 Introduction

This informational document is intended for workmen and foremen on construction sites. It describes the actions to be taken when mining or construction activities accidentally uncovers fossil material.

The Environmental Site Officer (ESO) [an internal appointment who is on site permanently during construction, to ensure legal compliance] is responsible to train the workmen and foremen in the procedure to follow when a fossil is accidentally uncovered. The ESO reports to the ECO (Environmental Compliance Officer) which is an external appointment to ensure legal compliance and is only on site occasionally. In the absence of the ESO, a member of the staff must be appointed to be responsible for the proper implementation of the chance find protocol as not to compromise the conservation of fossil material.

12.4 Chance Find Procedure

- If a chance find is made the person responsible for the find must immediately stop working
 and all work that could impact that finding must cease in the immediate vicinity of the
 find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, 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). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.

Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.

- The site must be secured to protect it from any further damage. No attempt should be made
 to remove material from their environment. The exposed finds must be stabilized and
 covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on
 the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care
 by the ESO or site manager. Fossils finds must be stored in tissue paper and in an
 appropriate box while due care must be taken to remove all fossil material from the rescue
 site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.

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Viglietti PA, et al 2020b. Biostratigraphy of the Massospondylus Assemblage Zone (Stormberg Group, Karoo Supergroup), South Africa. South African Journal of Geology 2020; 123 (2): 249-262. Palaeontological Impact Assessment for the proposed development of a sewage treatment package plant in Lusaka, Phuthaditjhaba, Thabo Mofutsanyana District, Free State

Appendix A - Elize Butler CV

ELIZE BUTLER

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 26 years in Palaeontology

EDUCATION: B.Sc. Botany and Zoology, 1988

University of the Orange Free State

B.Sc. (Hons) Zoology, 1991

University of the Orange Free State

Management Course, 1991

University of the Orange Free State

M. Sc. Cum laude (Zoology), 2009

University of the Free State

Dissertation title: The postcranial skeleton of the Early Triassic non-mammalian Cynodont *Galesaurus planiceps*: implications for biology and lifestyle

Registered as a PhD fellow at the Zoology Department of the UFS

2013 to current

Dissertation title: A new gorgonopsian from the uppermost Daptocephalus Assemblage Zone, in the Karoo Basin of South Africa

MEMBERSHIP

Palaeontological Society of South Africa (PSSA) 2006-currently

EMPLOYMENT HISTORY

Part-time Laboratory assistant Department of Zoology & Entomology

University of the Free State Zoology 1989-

1992

Part-time laboratory assistant Department of Virology

University of the Free State Zoology 1992

Research Assistant National Museum, Bloemfontein 1993 –

1997

TECHNICAL REPORTS

Butler, E. 2014. Palaeontological Impact Assessment of the proposed development of private dwellings on portion 5 of farm 304 Matjesfontein Keurboomstrand, Knysna District, Western Cape Province. Bloemfontein.

Butler, **E. 2014.** Palaeontological Impact Assessment for the proposed upgrade of existing water supply infrastructure at Noupoort, Northern Cape Province. 2014. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed consolidation, re-division, and development of 250 serviced erven in Nieu-Bethesda, Camdeboo local municipality, Eastern Cape. Bloemfontein.

Butler, **E. 2015.** Palaeontological impact assessment of the proposed mixed land developments at Rooikraal 454, Vrede, Free State. Bloemfontein.

Butler, E. 2015. Palaeontological exemption report of the proposed truck stop development at Palmiet 585, Vrede, Free State. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed Orange Grove 3500 residential development, Buffalo City Metropolitan Municipality East London, Eastern Cape. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Gonubie residential development, Buffalo City Metropolitan Municipality East London, Eastern Cape Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Ficksburg raw water pipeline. Bloemfontein.

Butler, E. 2015. Palaeontological Heritage Impact Assessment report on the establishment of the 65 mw Majuba Solar Photovoltaic facility and associated infrastructure on portion 1, 2 and 6 of the farm Witkoppies 81 HS, Mpumalanga Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed township establishment on the remainder of portion 6 and 7 of the farm Sunnyside 2620, Bloemfontein, Mangaung metropolitan municipality, Free State, Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Woodhouse 1 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Woodhouse 2 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Orkney solar energy farm and associated infrastructure on the remaining extent of Portions 7 and 21 of the farm Wolvehuis 114, near Orkney, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Spectra foods broiler houses and abattoir on the farm Maiden Manor 170 and Ashby Manor 171, Lukhanji Municipality, Queenstown, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupoort concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoort, Northern Cape. Prepared for Savannah Environmental. Bloemfontein.

- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed Woodhouse 1 Photovoltaic Solar Energy facility and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed Woodhouse 2 Photovoltaic Solar Energy facility and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.
- **Butler**, **E. 2016.** Proposed 132kV overhead power line and switchyard station for the authorised Solis Power 1 CSP project near Upington, Northern Cape. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed Senqu Pedestrian Bridges in Ward 5 of Sengu Local Municipality, Eastern Cape Province. Bloemfontein.
- **Butler, E. 2016.** Recommendation from further Palaeontological Studies: Proposed Construction of the Modderfontein Filling Station on Erf 28 Portion 30, Founders Hill, City of Johannesburg, Gauteng Province. Bloemfontein.
- **Butler, E. 2016.** Recommendation from further Palaeontological Studies: Proposed Construction of the Modikwa Filling Station on a Portion of Portion 2 of Mooihoek 255 Kt, Greater Tubatse Local Municipality, Limpopo Province. Bloemfontein.
- **Butler, E. 2016.** Recommendation from further Palaeontological Studies: Proposed Construction of the Heidedal filling station on Erf 16603, Heidedal Extension 24, Mangaung Local Municipality, Bloemfontein, Free State Province. Bloemfontein.
- **Butler, E. 2016.** Recommended Exemption from further Palaeontological studies: Proposed Construction of the Gunstfontein Switching Station, 132kv Overhead Power Line (Single or Double Circuit) and ancillary infrastructure for the Gunstfontein Wind Farm Near Sutherland, Northern Cape Province. Savannah South Africa. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.
- **Butler**, **E. 2016**. Chris Hani District Municipality Cluster 9 water backlog project phases 3a and 3b: Palaeontology inspection at Tsomo WTW. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupoort concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoort, Northern Cape. Savannah South Africa. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed upgrading of the main road MR450 (R335) from Motherwell to Addo within the Nelson Mandela Bay Municipality and Sunday's River valley Local Municipality, Eastern Cape Province. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment construction of the proposed Metals Industrial Cluster and associated infrastructure near Kuruman, Northern Cape Province. Savannah South Africa. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment for the proposed construction of up to a 132kv power line and associated infrastructure for the proposed Kalkaar Solar Thermal Power Plant near Kimberley, Free State and Northern Cape Provinces. PGS Heritage. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment of the proposed development of two burrow pits (DR02625 and DR02614) in the Enoch Mgijima Municipality, Chris Hani District, Eastern Cape.
- **Butler, E. 2016.** Ezibeleni waste Buy-Back Centre (near Queenstown), Enoch Mgijima Local Municipality, Eastern Cape. Bloemfontein.
- **Butler, E. 2016.** Palaeontological Impact Assessment for the proposed construction of two 5 Mw Solar Photovoltaic Power Plants on Farm Wildebeestkuil 59 and Farm Leeuwbosch 44, Leeudoringstad, North West Province. Bloemfontein.

- **Butler, E. 2016.** Palaeontological Impact Assessment for the proposed development of four Leeuwberg Wind farms and basic assessments for the associated grid connection near Loeriesfontein, Northern Cape Province. Bloemfontein.
- **Butler, E. 2016.** Palaeontological impact assessment for the proposed Aggeneys south prospecting right project, Northern Cape Province. Bloemfontein.
- **Butler, E. 2016.** Palaeontological impact assessment of the proposed Motuoane Ladysmith Exploration right application, KwaZulu Natal. Bloemfontein.
- **Butler, E. 2016.** Palaeontological impact assessment for the proposed construction of two 5 MW solar photovoltaic power plants on farm Wildebeestkuil 59 and farm Leeuwbosch 44, Leeudoringstad, North West Province. Bloemfontein.
- **Butler, E. 2016**: Palaeontological desktop assessment of the establishment of the proposed residential and mixed-use development on the remainder of portion 7 and portion 898 of the farm Knopjeslaagte 385 Ir, located near Centurion within the Tshwane Metropolitan Municipality of Gauteng Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological impact assessment for the proposed development of a new cemetery, near Kathu, Gamagara local municipality and John Taolo Gaetsewe district municipality, Northern Cape. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of The Proposed Development of The New Open Cast Mining Operations on The Remaining Portions Of 6, 7, 8 And 10 Of the Farm Kwaggafontein 8 In the Carolina Magisterial District, Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the Proposed Development of a Wastewater Treatment Works at Lanseria, Gauteng Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Scoping Report for the Proposed Construction of a Warehouse and Associated Infrastructure at Perseverance in Port Elizabeth, Eastern Cape Province.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the Proposed Establishment of a Diesel Farm and a Haul Road for the Tshipi Borwa mine Near Hotazel, In the John Taolo Gaetsewe District Municipality in the Northern Cape Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the Proposed Changes to Operations at the UMK Mine near Hotazel, In the John Taolo Gaetsewe District Municipality in the Northern Cape Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment for the Development of the Proposed Ventersburg Project-An Underground Mining Operation near Ventersburg and Henneman, Free State Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological desktop assessment of the proposed development of a 3000 MW combined cycle gas turbine (CCGT) in Richards Bay, Kwazulu-Natal. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment for the Development of the Proposed Revalidation of the lapsed General Plans for Elliotdale, Mbhashe Local Municipality. Bloemfontein.
- **Butler, E. 2017.** Palaeontological assessment of the proposed development of a 3000 MW Combined Cycle Gas Turbine (CCGT) in Richards Bay, Kwazulu-Natal. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed development of the new open cast mining operations on the remaining portions of 6, 7, 8 and 10 of the farm Kwaggafontein 8 10 in the Albert Luthuli Local Municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed mining of the farm Zandvoort 10 in the Albert Luthuli Local Municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed Lanseria outfall sewer pipeline in Johannesburg, Gauteng Province. Bloemfontein.

- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of open pit mining at Pit 36W (New Pit) and 62E (Dishaba) Amandelbult Mine Complex, Thabazimbi, Limpopo Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological impact assessment of the proposed development of the sport precinct and associated infrastructure at Merrifield Preparatory school and college, Amathole Municipality, East London. PGS Heritage. Bloemfontein.
- **Butler, E. 2017.** Palaeontological impact assessment of the proposed construction of the Lehae training and fire station, Lenasia, Gauteng Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of the new open cast mining operations of the Impunzi mine in the Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the construction of the proposed Viljoenskroon Munic 132 KV line, Vierfontein substation and related projects. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed rehabilitation of 5 ownerless asbestos mines. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of the Lephalale coal and power project, Lephalale, Limpopo Province, Republic of South Africa. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of a 132KV powerline from the Tweespruit distribution substation (in the Mantsopa local municipality) to the Driedorp rural substation (within the Naledi local municipality), Free State province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of the new coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of a Photovoltaic Solar Power station near Collett substation, Middelburg, Eastern Cape. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment for the proposed township establishment of 2000 residential sites with supporting amenities on a portion of farm 826 in Botshabelo West, Mangaung Metro, Free State Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed prospecting right project without bulk sampling, in the Koa Valley, Northern Cape Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed Aroams prospecting right project, without bulk sampling, near Aggeneys, Northern Cape Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed Belvior aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.
- **Butler, E. 2017.** PIA site visit and report of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of Tina Falls Hydropower and associated power lines near Cumbu, Mthlontlo Local Municipality, Eastern Cape. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed construction of the Mangaung Gariep Water Augmentation Project. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed Belvoir aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of the Melkspruit-Rouxville 132KV Power line. Bloemfontein.

- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of a railway siding on a Portion of portion 41 of the farm Rustfontein 109 is, Govan Mbeki local municipality, Gert Sibande district municipality, Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed consolidation of the proposed Ilima Colliery in the Albert Luthuli local municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed extension of the Kareerand Tailings Storage Facility, associated borrow pits as well as a storm water drainage channel in the Vaal River near Stilfontein, North West Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed construction of a filling station and associated facilities on the Erf 6279, district municipality of John Taolo Gaetsewe District, Ga-Segonyana Local Municipality Northern Cape. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed of the Lephalale Coal and Power Project, Lephalale, Limpopo Province, Republic of South Africa. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed Overvaal Trust PV Facility, Buffelspoort, North West Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed development of the H_2 Energy Power Station and associated infrastructure on Portions 21; 22 And 23 of the farm Hartebeestspruit in the Thembisile Hani Local Municipality, Nkangala District near Kwamhlanga, Mpumalanga Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed upgrade of the Sandriver Canal and Klippan Pump station in Welkom, Free State Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed upgrade of the 132kv and 11kv power line into a dual circuit above ground power line feeding into the Urania substation in Welkom, Free State Province. Bloemfontein.
- **Butler**, **E. 2017.** Palaeontological Desktop Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Impact Assessment of the proposed diamonds alluvial & diamonds general prospecting right application near Christiana on the remaining extent of portion 1 of the farm Kaffraria 314, registration division HO, North West Province. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Hartebeesfontein, near Panbult, Mpumalanga. Bloemfontein.
- **Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Rustplaas near Piet Retief, Mpumalanga. Bloemfontein.
- **Butler, E. 2018.** Palaeontological Impact Assessment for the Proposed Landfill Site in Luckhoff, Letsemeng Local Municipality, Xhariep District, Free State. Bloemfontein.
- **Butler**, E. 2018. Palaeontological Impact Assessment of the proposed development of the new Mutsho coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.
- **Butler, E. 2018.** Palaeontological Impact Assessment of the authorisation and amendment processes for Manangu mine near Delmas, Victor Khanye local municipality, Mpumalanga. Bloemfontein.
- **Butler**, **E. 2018.** Palaeontological Desktop Assessment for the proposed Mashishing township establishment in Mashishing (Lydenburg), Mpumalanga Province. Bloemfontein.
- **Butler, E. 2018.** Palaeontological Desktop Assessment for the Proposed Mlonzi Estate Development near Lusikisiki, Ngguza Hill Local Municipality, Eastern Cape. Bloemfontein.
- **Butler**, **E. 2018.** Palaeontological Phase 1 Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.

- **Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed electricity expansion project and Sekgame Switching Station at the Sishen Mine, Northern Cape Province. Bloemfontein.
- **Butler, E. 2018.** Palaeontological field assessment of the proposed construction of the Zonnebloem Switching Station (132/22kV) and two loop-in loop-out power lines (132kV) in the Mpumalanga Province. Bloemfontein.
- **Butler, E. 2018.** Palaeontological Field Assessment for the proposed re-alignment and decommissioning of the Firham-Platrand 88kv Powerline, near Standerton, Lekwa Local Municipality, Mpumalanga province. Bloemfontein.
- **Butler, E. 2018.** Palaeontological Desktop Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.
- **Butler, E. 2018.** Palaeontological field Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.
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- **Butler, E., 2021.** Palaeontological Impact Assessment for the Noko Solar Power Plant and power line which forms part of the authorised Paleso Solar Powerplant near Orkney in the North West. Banzai Environmental (Pty) Ltd, Bloemfontein.

- **Butler, E., 2021.** Palaeontological Impact Assessment for the Proposed Power Line as part of the Paleso Solar Power Plant near Viljoenskroon in the Free State. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the Thakadu Solar Plant which forms part of the authorised Paleso Solar Powerplant near Viljoenskroon in the Free State. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2020.** Palaeontological Desktop Assessment for the proposed Farming Expansions on Portions 50 of the Farm Rooipoort 555 JR, Portion 34 of the Farm Rooipoort 555 JR, Portions 20 and 49 of the Farm Rooipoort 555 JR and Portion 0(RE) of the Farm Oudou Boerdery 626 JR, Tshwane Metropolitan Municipality, Gauteng Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2020.** Palaeontological Desktop Assessment for the proposed Saselamani CBD on the Remainder of Tshikundu's Location 262 MT, and the Remainder of Portion 1 of Tshikundu's Location 262 MT, Collins Chabane Local Municipality, Limpopo Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the proposed expansions of the existing Molare Piggery infrastructure and related activities on Portion 0(Re) of the farm Arendsfontein 464 JS, Portion 0(Re) of the farm Wanhoop 443 JS, Portion 0(Re) of the farm Eikeboom 476 JS and Portions 2 & 7 of the farm Klipbank 467 JS within the jurisdiction of the Steve Tshwete Local Municipality, Mpumalanga Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Nchwaning Rail Balloon Turn Outs at Black Rock Mine Operations (BRMO) near Hotazel in the John Taolo Gaetsewe District Municipality in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Black Rock Mining Operations (BRMO) new rail loop and stacker reclaimer Project at Gloria Mine near Hotazel in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2020.** Palaeontological Desktop Assessment for the proposed Nchwaning Rail Balloon Turn Outs at Black Rock Mine Operations (BRMO) near Hotazel in the John Taolo Gaetsewe District Municipality in the Northern Cape.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the proposed utilization of one Borrow Pit for the planned Clarkebury DR08034 Road Upgrade, Engcobo Local Municipality, Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Kappies Kareeboom Prospecting Project on Portion 1 and the Remainder of the farm Kappies Kareeboom 540, the Remainder of Farm 544, Portion 5 of farm 534 and Portion 1 of the farm Putsfontein 616, ZF Mgcawu District Municipality, Northern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Kameel Fontein Prospecting Project on the Remainder of the farm Kameel Fontein 490, a portion of the farm Strydfontein 614 and the farm Soetfontein 606, ZF Mgcawu District Municipality, Northern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Lewis Prospecting Project on Portions of the Farms Lewis 535, Spence 537, Wright 538, Symthe 566, Bredenkamp 567, Brooks 568, Beaumont 569 and Murray 570, John Taolo Gaetsewe District Municipality in the Northern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the Construction of the Ganspan Pering 132kV Powerline, Phokwane Local Municipality, Frances Baard District Municipality in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the Longlands Prospecting Project on a Portion of the farm Longlands 350, Frances Baard District Municipality, Northern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.

- **Butler, E., 2021.** Palaeontological Impact Assessment for the proposed development of 177 new units in the northern section of Mpongo Park in the Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Qhumanco Irrigation Project, Chris Hani District Municipality Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Raphuti Settlement Project on Portions of the Farm Weikrans 539KQ in the Waterberg District Municipality of the Limpopo Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the Senqu Rural Project, Joe Gqabi District Municipality, Senqu Local Municipality, in the Eastern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the proposed new Township development on portion of the farm Klipfontein 716 and farm Ceres 626 in Bloemfontein, Mangaung Metropolitan Municipality, Free State. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the ECDOT Borrow Pits and WULA near Sterkspruit, Joe Gqabi District Municipality in the Eastern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed SANRAL Stone Crescent Embankment Stabilisation Works along the N2 on the farm Zyfer Fonteyn 253 (Portion 0, 11 and 12RE) and Palmiet Rivier 305 (Portion 34, 36) near Grahamstown in the Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the Klein Rooipoort Trust Citrus Development, in the Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the proposed Victoria West water augmentation project in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Campbell Sewer, Internal Reticulation, Outfall Sewer Line and Oxidation Ponds, located on ERF 1, Siyancuma Local Municipality in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed Development and Upgrades within the Great Fish River Nature Reserve, Eastern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for proposed Parsons Power Park a portion of Erf 1. within the Nelson Mandela Bay Municipality in the Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment for the proposed expansion of the farming operations on part of portions 7 and 8 of farm Boerboonkraal 353 in the Greater Tubatse Local Municipality of Sekhukhune District, Limpopo Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment to assess the proposed low-level pedestrian bridge, in Heilbron, Free State. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment to assess the proposed township developments in Hertzogville, Malebogo, in Heilbron, Free State. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment for the proposed construction of Malangazana Bridge on Farm No.64 Nkwenkwana, Engcobo Local Municipality, Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment to assess the proposed Construction of Middelburg Integrated Transport Control Centre on Portion 14 of Farm 81 Division of Middelburg, Chris Hani District Municipality in the Eastern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.

- **Butler, E., 2021.** Palaeontological Desktop Assessment for the Witteberge Sand Mine on the remainder of farm Elandskrag Plaas 269 located in the Magisterial District of Laingsburg and Central Karoo District Municipality in the Western Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Impact Assessment (PIA) to assess the proposed Agrizone 2, Dube Trade Port in KwaZulu Natal Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2021.** Palaeontological Desktop Assessment assessing the proposed Prospecting Right application without bulk sampling for the prospecting of Chrome ore and platinum group metals on the Remaining Extent of the farm Doornspruit 106, Registration Division: HO; North West Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the proposed Ennerdale Extension 2 Township Establishment on the Undeveloped Part of Portion 134 of the Farm Roodepoort 302IQ, City of Johannesburg Metropolitan Municipality, Gauteng Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the Construction of the ESKOM Mesong 400kV Loop-In Loop-Out Project, Ekurhuleni Municipality, Gauteng Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the Proposed Vinci Prospecting Right Application on the Remainder of the Farm Vinci 580, ZF Mgcawu District Municipality, in the Northern Cape Province, Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the proposed Farm 431 Mining Right Application (MRA), near Postmasburg, ZF Mgcawu District Municipality, in the Northern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Impact Assessment for the Leeuw Braakfontein Colliery Expansion Project (LBC) in the Amajuba District Municipality, KwaZulu-Natal. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the proposed reclamation of the 5L23 TSF in Ekurhuleni, Gauteng Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the Proposed Mogalakwena Mine Infrastructure Expansion (near Mokopane in the Mogalakwena Local Municipality, Limpopo Province). Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment for the proposed 10km Cuprum to Kronos Double Circuit 132kV Line and Associated Infrastructure in Copperton in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Impact Assessment for the proposed Hoekplaas WEF near Victoria West in the Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Desktop Assessment (PDA) assessing the proposed Prospecting Right Application without bulk sampling for the Prospecting of Diamonds Alluvial (DA), Diamonds General (D), Diamonds in Kimberlite (DK) & Diamonds (DIA) on the Remaining Extent of the Farm Goede Hoop 547, Remaining Extent of the Farm 548, Remaining Extent of Portion 2 and Portion 3 of the Farm Skeyfontein 536, Registration Division: Hay, Northern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Impact Assessment for the proposed extension of Duine Weg Road between Pellsrus and Marina Martinique as well as a Water Use Authorisation (WUA) for the project. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Proposed Mimosa Residential Development and Associated Infrastructure on Fairview Erven, in Gqeberha (Port Elizabeth), Nelson Mandela Bay Metropolitan Municipality, Eastern Cape Province. Banzai Environmental (Pty) Ltd, Bloemfontein.
- **Butler, E., 2022.** Palaeontological Impact Assessment for the Witteberge Sand Mine on the remainder of farm Elandskrag Plaas 269 located in the Magisterial District of Laingsburg and Central Karoo District Municipality in the Western Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.

