





PALAEONTOLOGICAL DESKTOP ASSESSMENT FOR THE PROPOSED MOGALAKWENA INFRASTRUCTURE EXPANSION NEAR MOKOPANE IN THE MOGALAKWENA LOCAL MUNICIPALITY, LIMPOPO PROVINCE

Issue Date: 18 January 2022

Revision No.: v0.1

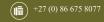
Client: SRK Consulting (South Africa) (Pty) Ltd

PGS Project No: 586HIA





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Declaration of Independence

I, Elize Butler, declare that -

General declaration:

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

Palaeontological Desktop Assessment for the proposed Mogalakwena Infrastructure Expansion near Mokopane in the Mogalakwena Local Municipality, Limpopo Province

Disclosure of Vested Interest

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

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SIGNATURE:

ACKNOWLEDGEMENT OF RECEIPT

Report Title	Palaeontological Desktop Assessment for the Proposed Mogalakwena Complex Infrastructure Expansion (near Mokopane in the Mogalakwena		
	Local Municipality, l	Limpopo Province).	
Control	Name Signature		Designation
Author	Elize Butler	Eitler.	Palaeontologist

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This Palaeontological Impact Assessment report has been compiled considering the National Environmental Management Act 1998 (NEMA) and Environmental Impact Regulations 2014 as amended, requirements for specialist reports, Appendix 6, as indicated in the table below.

Table 1 - NEMA Table

Requirements of Appendix 6 - GN R326	Relevant section in	Comment where
EIA Regulations of 7 April 2017	report	not applicable.
	Page ii and Section 2 of	-
	Report – Contact details	
1.(1) (a) (i) Details of the specialist who	and company and	
prepared the report	Appendix A	
(ii) The expertise of that person to	Section 2 – refer to	-
compile a specialist report including a	Appendix A	
curriculum vitae	Appelluix A	
(b) A declaration that the person is		-
independent in a form as may be	Page ii of the report	
specified by the competent authority		
(c) An indication of the scope of, and the		-
purpose for which, the report was	Section 4 – Objective	
prepared		
(cA) An indication of the quality and age	Section 5 - Geological	-
of base data used for the specialist	and Palaeontological	
report	history	
(cB) a description of existing impacts on		-
the site, cumulative impacts of the	Section 9	
proposed development and levels of	Occilor 5	
acceptable change;		
(d) The duration, date and season of the		Desktop
site investigation and the relevance of		Assessment
the season to the outcome of the		
assessment		
(e) a description of the methodology		-
adopted in preparing the report or		
carrying out the specialised process		
inclusive of equipment and modelling	Section 7 Approach and	
used	Methodology	
(f) details of an assessment of the		
specific identified sensitivity of the		
site related to the proposed activity or	Section 1 and 10	

Palaeontological Desktop Assessment for the proposed Mogalakwena Infrastructure Expansion near Mokopane in the Mogalakwena Local Municipality, Limpopo Province

Requirements of Appendix 6 - GN R326	Relevant section in	Comment where
EIA Regulations of 7 April 2017	report	not applicable.
activities and its associated		
structures and infrastructure,		
inclusive of a site plan identifying site		
alternatives;		
		No buffers or
(g) An identification of any areas to be		areas of sensitivity
avoided, including buffers	Section 5	identified
(h) A map superimposing the activity		
including the associated structures		
and infrastructure on the		
environmental sensitivities of the site	Section 5 – Geological	
including areas to be avoided,	and Palaeontological	
including buffers;	history	
(i) A description of any assumptions	Section 7.1 –	-
made and any uncertainties or gaps	Assumptions and	
in knowledge;	Limitation	
(j) A description of the findings and		
potential implications of such findings		
on the impact of the proposed activity,	Section 1 and 10	
including identified alternatives, on		
the environment		_
(k) Any mitigation measures for inclusion		Desktop Study
in the EMPr		_
(I) Any conditions for inclusion in the		Desktop Study
environmental authorisation		_
(m) Any monitoring requirements for		Desktop Study
inclusion in the EMPr or		
environmental authorisation		
(n)(i) A reasoned opinion as to whether	Section 1 and 10	
the proposed 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	Section 1 and 10	
thereof should be authorised, any		

Palaeontological Desktop Assessment for the proposed Mogalakwena Infrastructure Expansion near Mokopane in the Mogalakwena Local Municipality, Limpopo Province

Requirements of Appendix 6 - GN R326	Relevant section in	Comment where
EIA Regulations of 7 April 2017	report	not applicable.
avoidance, management and		
mitigation measures that should		
be included in the EMPr, and		
where applicable, the closure plan		
		Not applicable. A
		public
		consultation
		process will be
(o) A description of any consultation		conducted as part
process that was undertaken during		of the EIA and
the course of carrying out the study	N/A	EMPr process.
(p) A summary and copies if any		
comments that were received during		
any consultation process	N/A	
(q) Any other information requested by the		
competent authority.	N/A	
(2) Where a government notice by the		
Minister provides for any protocol or		
minimum information requirement to be	Section 3 compliance	
applied to a specialist report, the	with SAHRA guidelines	
requirements as indicated in such notice will		
apply.		

EXECUTIVE SUMMARY

Banzai Environmental was appointed by PGS Heritage (Pty) Ltd to conduct a Palaeontological Desktop Assessment (PDA) for the proposed Mogalakwena Complex Project (near Mokopane in the Mogalakwena Local Municipality, Limpopo Province). In compliance with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this PDA is necessary to confirm if fossil material could potentially be present in the residential development area and to evaluate the impact of the proposed development on the Palaeontological Heritage.

The proposed development is primarily underlain by the Malmani Subgroup (Chuniespoort Group) within the Transvaal Supergroup. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Malmani Subgroup is Very High (Almond and Pether 2008, SAHRIS website).

It is thus recommended that a phase 1 field-based assessment report be conducted to assess the value and prominence of fossils in the development area and the effect of the proposed development on the palaeontological heritage. The purpose of the report is to elaborate on the issues and potential impacts identified during process. A Phase 1 field-based assessment will be conducted and research in the site-specific study area as well as a comprehensive assessment of the likely impacts.

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TERMINOLOGY AND ABBREVIATIONS

Cultural significance

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

Development

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

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

Fossil

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

Heritage

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

Heritage resources

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

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

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Palaeontology

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

Table 2: Abbreviations

Abbreviations	Description
AIA	Archaeological Impact Assessment
ASAP	Association of South African Professional Archaeologists
CRM	Cultural Resource Management
ECO	Environmental Control Officer
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
ESA	Early Stone Age
GPS	Global Positioning System
HIA	Heritage Impact Assessment
I&AP	Interested & Affected Party
LSA	Late Stone Age
LIA	Late Iron Age
MSA	Middle Stone Age
MIA	Middle Iron Age
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
PDA	Palaeontological Desktop Assessment
PIA	Palaeontological Impact Assessment
PHRA	Provincial Heritage Resources Authority
PSSA	Palaeontological Society of South Africa
SADC	Southern African Development Community
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System

1 INTRODUCTION

SRK Consulting South Africa (Pty) Ltd (SRK) has been appointed by Mogalakwena Complex (near Mokopane in the Mogalakwena Local Municipality, Limpopo Province) to conduct a Basic Assessment (BA) processes for the following projects (**Figure 1-3**):

Cable repair yard

At present, the Mogalakwena Complex has a cable repair workshop which is located close to the Central Pit. The existing cable repair workshop is for repairing/maintaining cables for primary equipment. The Mogalakwena Complex is currently investigating further mining of the North Pit. Due to this, the cable repair workshop will need to be removed as it is within the blasting radius.

The main objective of this project is to construct a new cable repair workshop to replace the existing cable repair workshop in order to continue mining the North Pit. It is anticipated that the overall site area which will be cleared will be approximately 2 ha and the enclosed area will be 5500m².

Pre-assembly yard

In 2019, an environmental authorisation (EA) amendment process was undertaken to authorise several new activities and associated infrastructure at Mogalakwena Complex for the expansion of its existing operations in order to improve production capacity. A new third concentrator plant (known as the M3C) and associated water management infrastructure formed part of the authorisation process which was approved in August 2020. In addition to this a contractor's laydown area was also approved however according to AAP this area is not sufficient for the proposed M3C pre-assembly activities and an additional area is required.

In order to support the construction of the M3C, an additional footprint area of approximately 18 hectares is required to accommodate the necessary temporary construction facilities, the laydown of equipment and materials as well as the pre-assembly of structures required for the M3C (conveyors, gantries and pipe racks).

Mogalakwena Complex would like to establish the pre-assembly yard to the south of the existing return water dam which is within the mine lease area on the Farm Vaalkop 819 LR. The area is bordered on the western side by Bakenberg Road and the main Mogalakwena North Concentrator access road, to the south by the Ga-Molekana gravel access road and on the northern side by existing contractor laydown facilities and tanks directly adjacent to the proposed buffer dam. The area is bordered on the eastern side by a 22kV Eskom line which branches off from the 132kV Eskom overhead powerline.

2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This present study has been conducted by Mrs Elize Butler. She has conducted approximately 300 palaeontological impact assessments for developments in the Free State, KwaZulu-Natal, Eastern,

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Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (*cum laude*) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-five years. She has experience in locating, collecting, and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

3 LEGISLATION

3.1 National Heritage Resources Act (25 of 1999)

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

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

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

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

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

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

National Heritage Resources Act (NHRA) Act 25 of 1999

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

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Mogalakwena Local Municipality, Limpopo Province						
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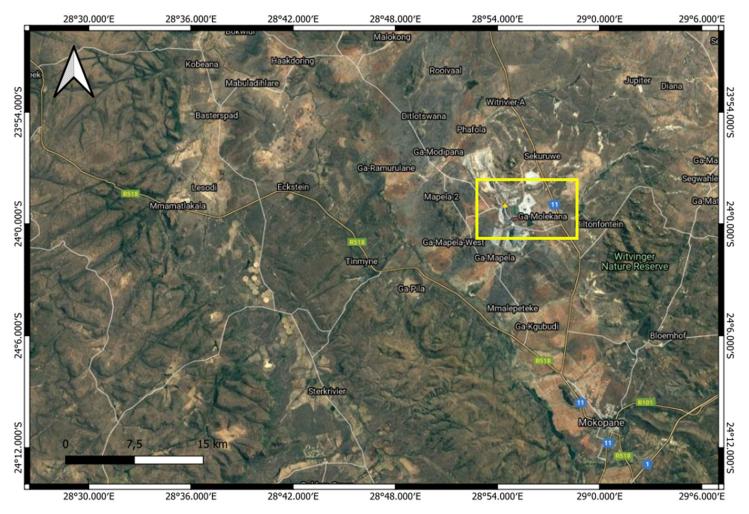


Figure 1: Google Earth (2021) Image of the proposed Mogalakwena Complex Infrastructure Expansion, near Mokopane in the Mogalakwena Local Municipality, Limpopo Province.

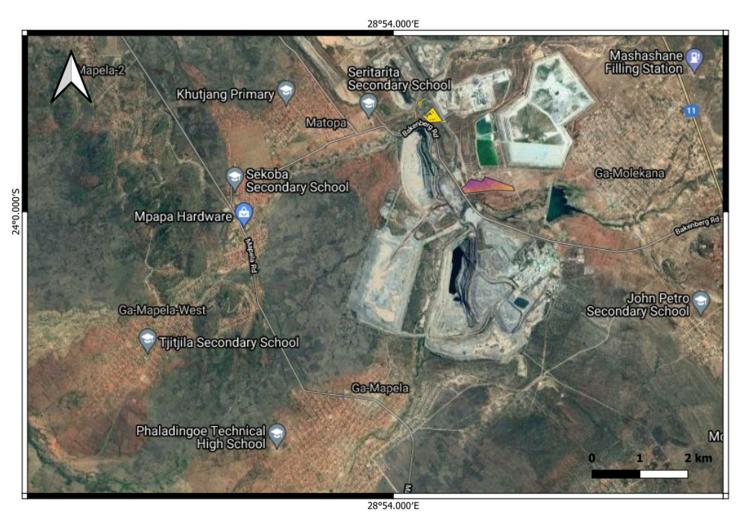


Figure 2:Cose-up image of the proposed Mogalakwena Complex Infrastructure Expansion, near Mokopane in the Mogalakwena Local Municipality, Limpopo Province. The pre-assembly yard is indicated in yellow and the cable repair bay in multi-colours colours.

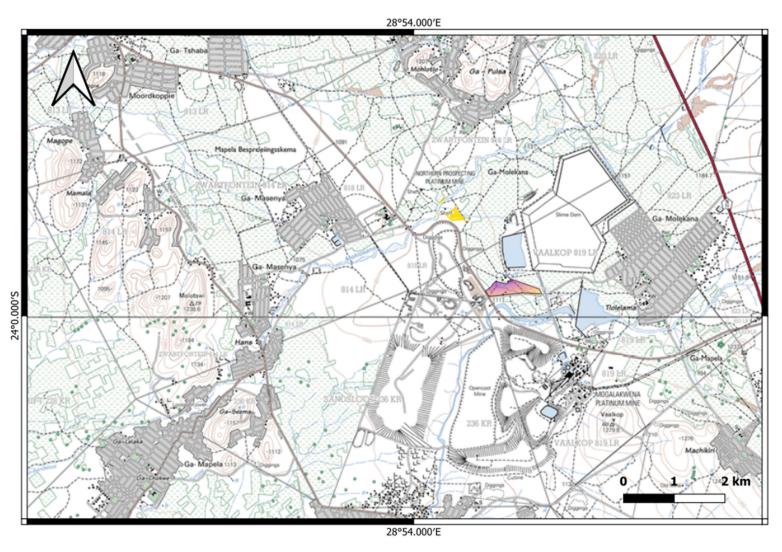


Figure 3: Locality Map of the proposed infrastructure expansion.

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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 Palaeontological Impact Assessment (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 PIA 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—
- (exceeding 5 000 m² in extent; or
- involving three or more existing erven or subdivisions thereof; or
- involving three or more erven or divisions thereof which have been consolidated within the past five years; or
- the costs of which will exceed a sum set in terms of regulations by SAHRA or a provincial heritage resources authority
- the re-zoning of a site exceeding 10 000 m² in extent;
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

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4 OBJECTIVE

The aim of a PIA is to decrease the effect of the development on potential fossils at the development site.

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

The terms of reference of a PIA are as follows:

General Requirements:

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

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 Implications of specialist findings for the proposed development (such as permits, licenses etc).

5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The geology of the proposed Mogalakwena Complex Infrastructure Expansion, near Mokopane in the Mogalakwena Local Municipality, Limpopo Province is depicted on the 1:250 000 2328 Pietersburg Geological Map (1985) (Council of Geoscience, Pretoria) (**Figure 4-5**). The development footprint is primary underlain by Precambrian dolomites and associated marine sedimentary rocks that are allocated to the Malmani Subgroup (Chuniespoort Group) within the Transvaal Supergroup. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Malmani Subgroup is Very High (**Figure 6**; Almond and Pether 2008, SAHRIS website). Groenewald and Groenewald 2014 allocated a high Sensitivity to the Malmani Subgroup. He noted that additionally to the stromatolites, potentially fossiliferous Late Caenozoic Cave breccias within the "Transvaal dolomite" outcrop area could be present. These breccias are not individually mapped on geological maps.

The Malmani Subgroup carbonates of the Transvaal Basin comprise of an assortment of stromatolites (microbial laminates), ranging from supratidal mats to intertidal columns and large subtidal domes (Eriksson *et al.* 2006). Stromatolites are layered mounds, columns and sheet-like sedimentary rocks. These structures were originally formed by the growth of layer upon layer of cyanobacteria, a single-celled photosynthesizing microbe. Cyanobacteria are prokaryotic cells (simplest form of modern carbon-bases life). Stromatolites are first found in Precambrian rocks and are known as the earliest known fossils. The oxygen atmosphere that we depend on today was generated by numerous cyanobacteria photosynthesizing during the Archaean and Proterozoic Era.

Stromatolites and oolites from the Transvaal Supergroup have been described by various authors (Eriksson and Altermann, 1998). Detailed descriptions of South African Archaean stromatolites are available in the literature (Altermann, 2001; Buick, 2001; and Schopf, 2006). The Malmani stromatolites literature includes articles by Truswell and Eriksson (1972, 1973, 1975), Eriksson and MacGregor (1981), Eriksson and Altermann (1998), Sumner (2000), Schopf (2006).

The Malmani Subgroup succession is about 2 km-thick and consists of a series of formations of oolitic and stromatolitic carbonates (limestones and dolomites), black carbonaceous shales and minor secondary cherts. The Malmani Dolomites also consist of historic lime mines, and palaeocave fossil deposits. Dolomite (limestone rock) forms in warm, shallow seas from slow gathering remainders of marine microorganisms and fine-grained sediment. Dolomites of the Malmani Subgroup has a higher magnesium content than other limestones. These materials

The proposed development is surrounded by rocks of the Rustenburg Layered Suite and Lebowa Granite Suite of the Bushveld Complex as well as the Hout River Gneiss Suite (Archaean Granitoid Intrusions). These rocks are all igneous in origin and thus unfossiliferous.

The Hout River Gneiss Suite is present in the north-eastern Kaapvaal craton and contain granitoid gneisses with various compositions. This Gneiss consists of coarse-grained metamorphic rock that is typically banded and is formed by regional high-grade metamorphism of granite. Alkali feldspar, amphiboles mica, quartz, and rarely pyroxenes form large crystals in this gneiss (Robb et al, 2006).

The Bushveld Complex consists of three different types of igneous rocks. The oldest is a series of volcanic rocks, followed by basaltic magma that did not reach the surface but instead formed an enormous underground chamber of approximately 400 x 300 km across the Limpopo, North West and Mpumalanga Provinces reaching a maximum thickness of approximately 8 km. Lastly magma intruded above the basaltic body and crystallized as granite. The three components are known as the Rooiberg Group, Rustenburg Layered Suite and Lebowa Granite Suite, which together make up the Bushveld Complex.

The Rustenburg Layered Suite is Vaalian in age (2,100 – 1,920 million years old) and consists of an igneous intrusion with anorthosite, hybrid gabbro, gabbro, diabase, epidiorite, pyroxenite, and norite rocks



Figure 4: Extract of the 1:250 000 2328 Pietersburg (1985) Geological Map (Council of Geoscience, Pretoria) indicating the geology of the proposed development.

The pre-assembly yard is indicated in yellow and the cable repair bay in multi-colours colours.

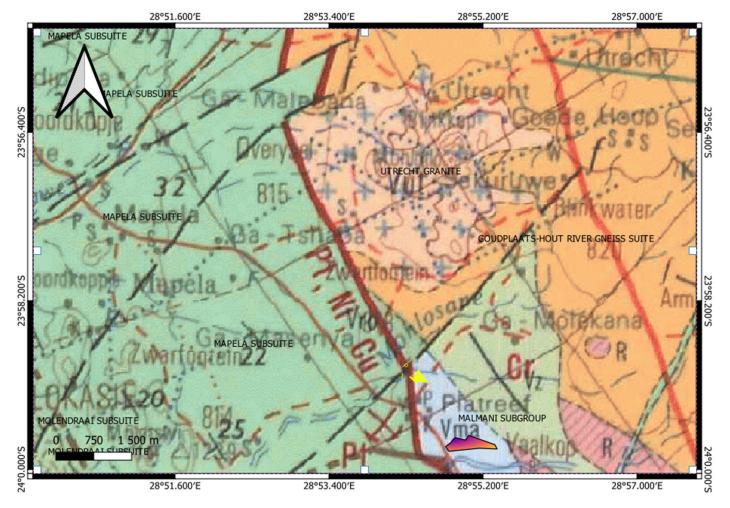


Figure 5: General Geology of the proposed development.

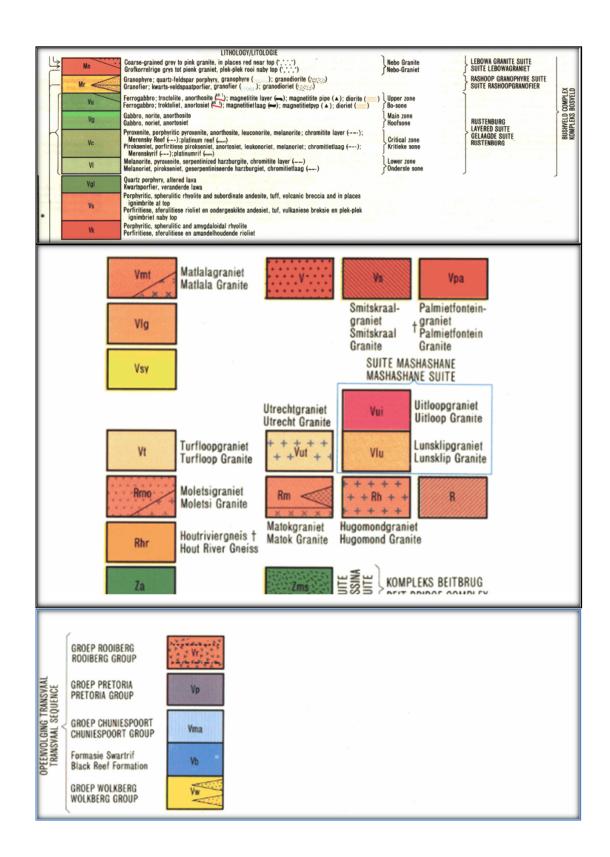




Figure 6: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed development in variegated colours.

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 comes to light,
		SAHRA will continue to populate the map.

According to the SAHRIS Palaeosensitivity map (**Figure 6**) 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 sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

6 GEOGRAPHICAL LOCATION OF THE SITE

The proposed project (near Mokopane in the Mogalakwena Local Municipality, Limpopo Province) is indicated in **Figure 1-3**.

The area is bordered on the western side by Bakenberg Road and the main Mogalakwena North Concentrator access road, to the south by the Ga-Molekana gravel access road and on the northern side by existing contractor laydown facilities and tanks directly adjacent to the proposed buffer dam. The area is bordered on the eastern side by a 22kV Eskom line which branches off from the 132kV Eskom overhead powerline (Figure 2-3).

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 Palaeontological impact assessment 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 generally 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 which was not yet been documented. When similar Assemblage Zones and geological formations for Desktop studies is used it is generally **assumed** that exposed fossil heritage is present within the footprint.

8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

Palaeontological Desktop Assessment for the proposed Mogalakwena Infrastructure Expansion near Mokopane in the Mogalakwena Local Municipality, Limpopo Province

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- 1: 250 000 2328 Pietersburg Geological Map (Council of Geoscience, Pretoria)
- A Google Earth map with polygons of the proposed development was obtained from PGS Consultants.

9 IMPACT ASSESSMENT METHODOLOGY

9.1 Introduction

PLEASE NOTE:

The impact significance rating process serves two purposes: firstly, it helps to highlight the critical impacts requiring consideration in the management and approval process; secondly, it shows the primary impact characteristics, as defined above, used to evaluate impact significance.

The impacts will be ranked according to the methodology described below. Where possible, mitigation measures will be provided to manage impacts. In order to ensure uniformity, a standard impact assessment methodology will be utilised so that a wide range of impacts can be compared with each other. The impact assessment methodology makes provision for the assessment of impacts against the following criteria:

- Significance;
- Spatial scale;
- Temporal scale;
- Probability; and
- Degree of certainty.

A combined quantitative and qualitative methodology was used to describe impacts for each of the assessment criteria. A summary of each of the qualitative descriptors along with the equivalent quantitative rating scale for each of the aforementioned criteria is given below.

Table 4: Quantitative rating and equivalent descriptors for the impact assessment criteria

RATING	SIGNIFICANCE	EXTENT SCALE	TEMPORAL SCALE
1	VERY LOW	Proposed site	Incidental
2	LOW	Study area	Short-term
3	MODERATE	Local	Medium/High-term
4	HIGH	Regional / Provincial	Long-term
5	VERY HIGH	Global / National	Permanent

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A more detailed description of each of the assessment criteria is given in the following sections.

9.2 Significance Assessment

Significance rating (importance) of the associated impacts embraces the notion of extent and magnitude but does not always clearly define these since their importance in the rating scale is very relative. For example, the magnitude (i.e. the size) of area affected by atmospheric pollution may be extremely large (1 000 km2) but the significance of this effect is dependent on the concentration or level of pollution. If the concentration is great, the significance of the impact would be HIGH or VERY HIGH, but if it is diluted it would be VERY LOW or LOW. Similarly, if 60 ha of a grassland type are destroyed the impact would be VERY HIGH if only 100 ha of that grassland type were known. The impact would be VERY LOW if the grassland type was common. A more detailed description of the impact significance rating scale is given below.

Table 5: Description of the significance rating scale

RATING		DESCRIPTION	
5	Very high	Of the highest order possible within the bounds of impacts which could	
		occur. In the case of adverse impacts: there is no possible mitigation and/or	
		remedial activity which could offset the impact. In the case of beneficial	
		impacts, there is no real alternative to achieving this benefit.	
4	High	Impact is of substantial order within the bounds of impacts, which could	
7	riigii	occur. In the case of adverse impacts: mitigation and/or remedial activity is	
		feasible but difficult, expensive, time-consuming or some combination of	
		these. In the case of beneficial impacts, other means of achieving this	
		benefit are feasible but they are more difficult, expensive, time-consuming	
		or some combination of these.	
3	Moderate	Impact is real but not substantial in relation to other impacts, which might	
		take effect within the bounds of those which could occur. In the case of	
		adverse impacts: mitigation and/or remedial activity are both feasible and	
		fairly easily possible. In the case of beneficial impacts: other means of	
		achieving this benefit are about equal in time, cost, effort, etc.	
2	Low	Impact is of a low order and therefore likely to have little real effect. In the	
		case of adverse impacts: mitigation and/or remedial activity is either easily	
		achieved or little will be required, or both. In the case of beneficial impacts,	
		alternative means for achieving this benefit are likely to be easier, cheaper,	
		more effective, less time consuming, or some combination of these.	
1	Very low	Impact is negligible within the bounds of impacts which could occur. In the	
		case of adverse impacts, almost no mitigation and/or remedial activity are	
		needed, and any minor steps which might be needed are easy, cheap, and	
		simple. In the case of beneficial impacts, alternative means are almost all	

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		likely to be better, in one or a number of ways, than this means of achieving
		the benefit. Three additional categories must also be used where relevant.
		They are in addition to the category represented on the scale, and if used,
		will replace the scale.
0	No impact	There is no impact at all - not even a very low impact on a party or system.

9.3 Spatial Scale

The spatial scale refers to the extent of the impact i.e. will the impact be felt at the local, regional, or global scale. The spatial assessment scale is described in more detail below.

Table 6: Description of the significance rating scale

RATING		DESCRIPTION		
5	Global/National	The maximum extent of any impact.		
4	Regional/Provincial	The spatial scale is moderate within the bounds of impacts possible and will be felt at a regional scale (District Municipality to Provincial Level).		
3	Local	The impact will affect an area up to 10 km from the proposed site.		
2	Study Site	The impact will affect an area not exceeding the Eskom property.		
1	Proposed site	The impact will affect an area no bigger than the ash disposal site.		

9.4 Duration Scale

In order to accurately describe the impact, it is necessary to understand the duration and persistence of an impact in the environment. The temporal scale is rated according to criteria set out in table below.

Table 7: Description of the temporal rating scale

RATING		DESCRIPTION	
1	Incidental The impact will be limited to isolated incidences that are expected very sporadically.		
2	Short-term	The environmental impact identified will operate for the duration of the construction phase or a period of less than 5 years, whichever is the greater.	
3	Medium/High term	The environmental impact identified will operate for the duration of life of facility.	

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4	Long term	The environmental impact identified will operate beyond the life of		
		operation.		
5	Permanent	The environmental impact will be permanent.		

9.5 Degree of Probability

Probability or likelihood of an impact occurring will be described as shown in table below.

Table 8: Description of the degree of probability of an impact occurring.

RATING	DESCRIPTION	
1	Practically impossible	
2	Unlikely	
3	Could happen	
4	Very Likely	
5	It's going to happen / has occurred	

9.6 Degree of Certainty

As with all studies it is not possible to be 100% certain of all facts, and for this reason a standard "degree of certainty" scale is used as discussed in table below. The level of detail for specialist studies is determined according to the degree of certainty required for decision-making. The impacts are discussed in terms of affected parties or environmental components.

Table 9: Description of the degree of certainty rating scale

RATING	DESCRIPTION		
Definite	More than 90% sure of a particular fact.		
Probable	Between 70 and 90% sure of a particular fact, or of the likelihood of that impact occurring.		
Possible	Between 40 and 70% sure of a particular fact or of the likelihood of an impact occurring.		
Unsure	Less than 40% sure of a particular fact or the likelihood of an impact occurring.		
Can't know	The consultant believes an assessment is not possible even with additional research.		
Don't know	The consultant cannot, or is unwilling, to make an assessment given available information.		

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9.7 Quantitative Description of Impacts

To allow for impacts to be described in a quantitative manner in addition to the qualitative description given above, a rating scale of between 1 and 5 was used for each of the assessment criteria. Thus, the total value of the impact is described as the function of significance, spatial and temporal scale as described below:

Impact Risk = (SIGNIFICANCE (5)+ Spatial (2)+ Temporal(5)) X Probability(4_)
5

Table 10: Impact ratings for the proposed development

Impact	Significance	Spatial Scale	Temporal Scale	Probability	Rating
	Very High	Site	Permanent	Could Happen	
Impact	5	2	5	4	3.2

Note: The significance, spatial and temporal scales are added to give a total of 12, that is divided by 3 to give a criteria rating of 4. The probability (4) is divided by 5 to give a probability rating of 0,8. The criteria rating of 4 is then multiplied by the probability rating (0,8) to give the final rating of 3.2.

The impact risk is classified according to five classes as described below.

Table 11: Impact Risk Classes

RATING	IMPACT CLASS	DESCRIPTION
0.1 – 1.0	1	Very Low
1.1 – 2.0	2	Low
2.1 – 3.0	3	Moderate
3.1 – 4.0	4	High
4.1 – 5.0	5	Very High

Therefore, with reference to the example above, an impact rating of 3.2 will fall in the **Impact Class 4**, which will be considered to be a **high impact**.

9.8 SUMMARY OF IMPACT TABLES

Only the site will be affected by the proposed development. The proposed development will have a negative impact on Fossil Heritage. The expected duration of the impact is assessed as potentially permanent to long term. The impact could occur. The significance of the impact

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occurring will be High. As fossil heritage will be destroyed the impact is irreversible. The impact on fossil heritage will be High.

The degree of Certainty is probable with a Between 70 and 90% sure of a particular fact, or of the likelihood of that impact occurring

10 FINDINGS AND RECOMMENDATIONS

The proposed development is primarily underlain by the Malmani Subgroup (Chuniespoort Group) within the Transvaal Supergroup. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Malmani Subgroup is Very High (Almond and Pether 2008, SAHRIS website).

It is thus recommended that a phase 1 field-based assessment report be conducted to assess the value and prominence of fossils in the development area and the effect of the proposed development on the palaeontological heritage. The purpose of the report is to elaborate on the issues and potential impacts identified during the process. A Phase 1 field-based assessment will be conducted and research in the site-specific study area as well as a comprehensive assessment of the likely impacts.

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APPENDIX A - ELIZE BUTLER CV

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

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

Principal Research Assistant National Museum, Bloemfontein

and Collection Manager 1998–currently

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