

**Palaeontological Impact Assessment for the
proposed Sand Mining Right Application on Farm
De Klerkskraal 231 JD, Theunissen,
Free State Province**

Desktop Study (Phase 1)

For

Beyond Heritage

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Prof Marion Bamford

Palaeobotanist

P Bag 652, WITS 2050

Johannesburg, South Africa

Marion.bamford@wits.ac.za

Expertise of Specialist

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

Declaration of Independence

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

Specialist: Prof Marion Bamford

A handwritten signature in blue ink, appearing to read 'MKBamford', written over a horizontal line.

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the Mining Right Application by Vengablox (Pty) Ltd to mine sand in small portions on Portions 0 and 1 of Farm De Klerks Kraal 231 JD, Theunissen, within the Lejweleputswa magisterial district of the Free State Province .

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

The proposed site lies on the Quaternary alluvium and sands alongside the Sand River. There is a chance that transported and fragmented robust fossils may have been washed down the river and incorporated into the sands. Such fossils, if present, would be of minimal scientific value because they would be out of primary context and their source unknown. Nonetheless, a Fossil Chance Find Protocol should be added to the EMPr. Based on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the contractor/ environmental officer/ other designated responsible person once mining activities have commenced. As far as the palaeontology is concerned, the project should be authorised because the impact on the fossil heritage would be very low.

Table of Contents

Expertise of Specialist	1
Declaration of Independence	1
1. Background	4
2. Methods and Terms of Reference.....	7
3. Geology and Palaeontology.....	8
i. Project location and geological context	8
ii. Palaeontological context.....	9
4. Impact assessment.....	10
5. Assumptions and uncertainties.....	12
6. Recommendation.....	12
7. References	12
8. Chance Find Protocol	13
9. Appendix A – Examples of fossils from the	14
10. Appendix B – Details of specialist.....	14
Figure 1: Google Earth map of the general area to show the relative land marks.	6
Figure 2: Google Earth Map of the proposed development	7
Figure 3: Topographic map of the mining area.....	7
Figure 4: Geological map of the area around the project site.....	8
Figure 5: SAHRIS palaeosensitivity map for the site	10

1. Background

The Applicant, Vengablox (Pty) Ltd, applied for environmental and mining authorisation to mine sand from 238.5426 ha that extends over Portion 0 and Portion 1 (Remaining Extent) of the farm De Klerks Kraal No 231 RD within the Lejweleputswa magisterial district of the Free State Province. (Document: FS 30/5/1/2/2/10071 MR) (Figures 1-3).

The Applicant proposes to divide the mining right footprint into smaller mining areas of ±2.5 ha each (minor areas). It is proposed that no more than two minor areas will be mined at any given time. In addition to the proposed 2.5 ha minor areas, the Applicant will have a designated processing- and stockpiling area (1.5 ha) where the mined material will be screened and washed prior to being stockpiled and transported to clients. In other words, the total footprint to be altered by mining activities at any given time calculates to ±6.5 ha of the 239 ha mining right area. Once a 2.5 ha area is mined-out the area will be rehabilitated prior to the opening of a third minor area. In light of this, the current project proposal will entail the disturbance of ±2.7% of the mining right area (major area) at any given time.

A Palaeontological Impact Assessment was requested for the De Klerkskraal sand Mining Right Application (MRA). To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development and is reported herein.

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

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

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



Figure 1: Google Earth map of the general area to show the relative land marks. The De Klerks Kraal mining right area is shown by the black outline.

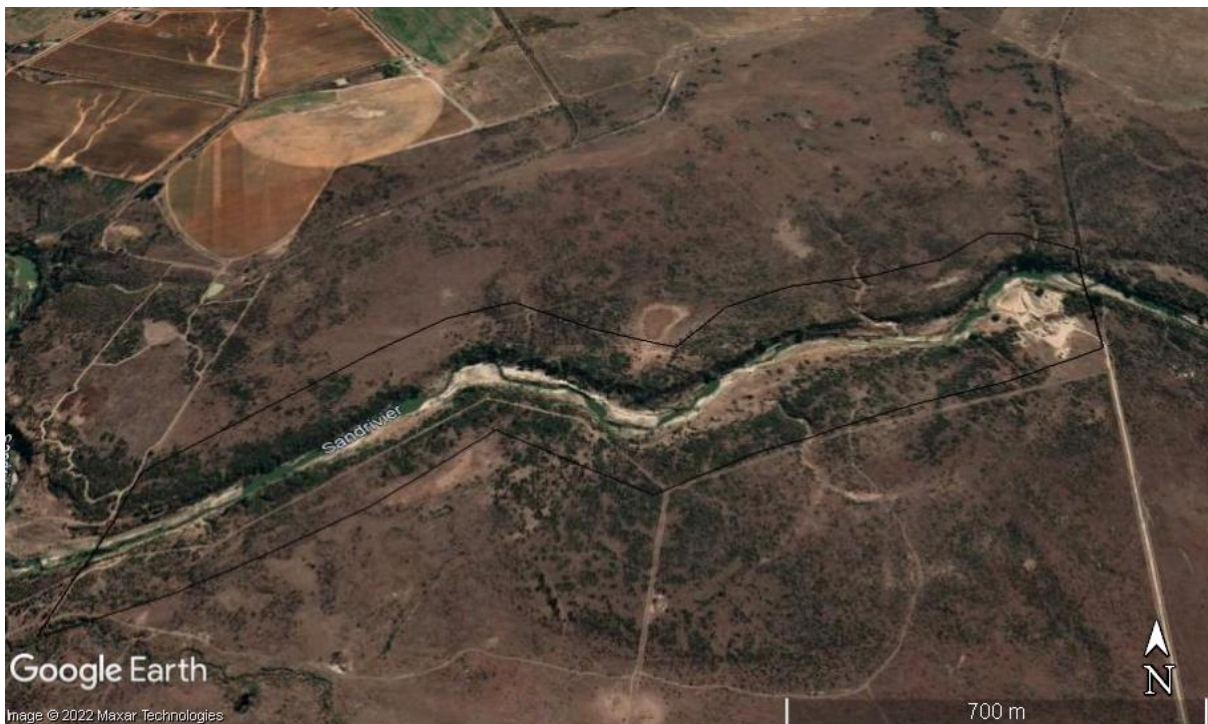


Figure 2: Google Earth Map of the proposed De Klerks Kraal Sand Mining Right area in the thin black outline

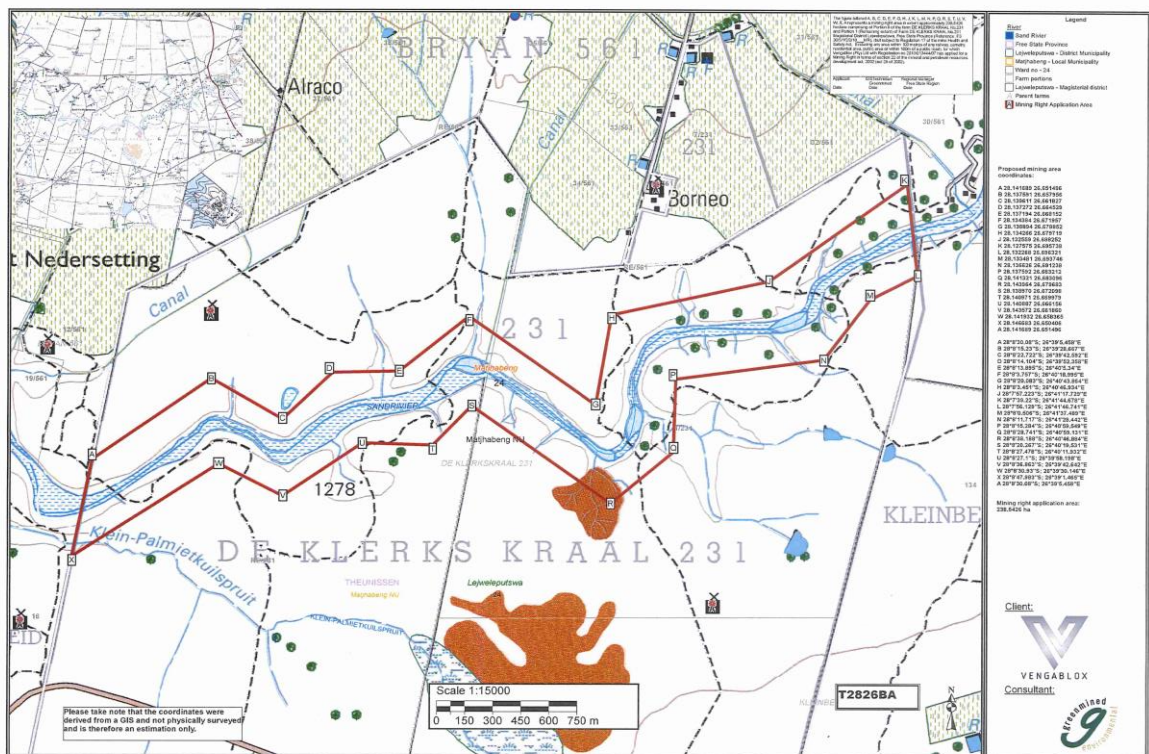


Figure 3: Annotated topographic map to show the mining right area on both sides of the Sand River with the sections shown by the red outline. Farm De Klerks Kraal 2231 JD, portions 0 and 1.

2. Methods and Terms of Reference

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

The methods employed to address the ToR included:

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

3. Geology and Palaeontology

i. Project location and geological context

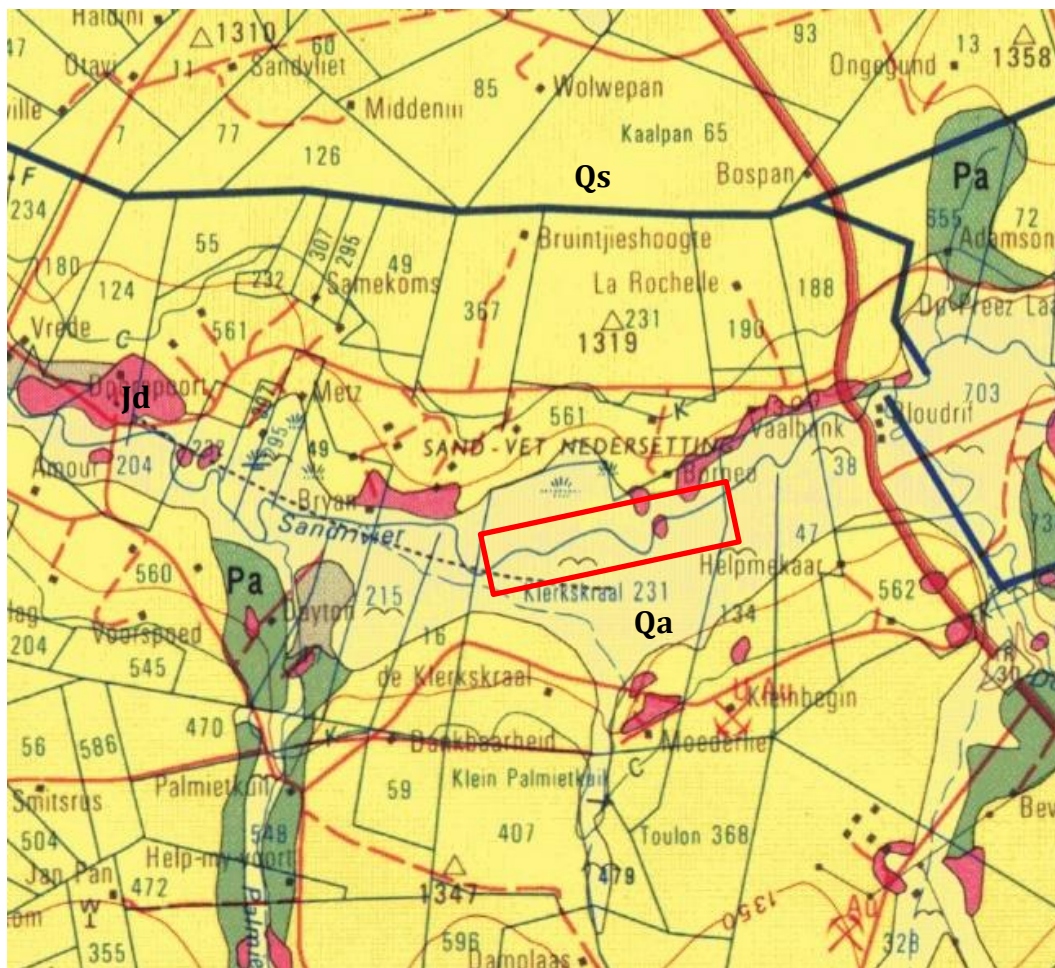


Figure 4: Geological map of the area around the Farm De Klerkskraal 231, Theunissen. The location of the proposed MRA is indicated within the yellow rectangle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2826 Winburg.

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

Symbol	Group/Formation	Lithology	Approximate Age
Qa	Quaternary	Alluvium, calcified alluvium, gravel, sand	Neogene, ca 1 Ma to present
Qs	Quaternary	Sand, red-grey aeolian sand	Neogene, ca 1 Ma to present
Jd	Jurassic dykes	Dolerite dykes, intrusive	Jurassic, approx. 180 Ma
Pa	Adelaide Subgroup, Beaufort Group, Karoo SG	Buff-white and white sandstone, blue-grey mudstone and shales,	Late Permian

Symbol	Group/Formation	Lithology	Approximate Age
		subordinate conglomerate	

The project lies in the central part of the Karoo Basin that contains rocks and sediments of the Karoo Supergroup, with much younger Quaternary sediments associated with fluvial systems.

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

During the Carboniferous Period South Africa was part of the huge continental landmass known as Gondwanaland and it was positioned over the South Pole. As a result, there were several ice sheets that formed and melted, and covered most of South Africa. Gradual melting of the ice as the continental mass moved northwards and the earth warmed, formed fine-grained sediments in the large inland sea. These are the oldest rocks in the system and are exposed around the outer part of the ancient Karoo Basin, and are known as the Dwyka Group (Johnson et al., 2006).

Overlying the Dwyka Group rocks are rocks of the Ecca Group that are Early Permian in age. Overlying the Ecca Group are the rocks of the Beaufort Group that has been divided into the lower Adelaide Subgroup for the Upper Permian strata, and the Tarkastad Subgroup for the Early to Middle Triassic strata. As with the older Karoo sediments, the formations vary across the Karoo Basin. Large exposures of Jurassic dolerite dykes occur throughout the area. These intruded through the Karoo sediments around 183 million years ago at about the same time as the Drakensberg basaltic eruption.

Much more recent weathering and fluvial activity during the Later Quaternary has resulted in the deposition of sands along watercourses and in over bank deposits. The source for the alluvium is the whole of the river catchment. It is a dynamic system with sands and alluvium washed downstream with every flood

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 5. The site for mining is in the moderately sensitive Quaternary alluvium. It is possible that fragments of the more robust fossils from upstream, such as bone or silicified wood, could have been washed down the river with the sands and temporarily deposited, until the next flood. Because of the dynamic nature of the system, the source of any gravel, sand or fossils fragments is unknown. This greatly reduces the scientific value of the fossils because they are out of primary context. In addition, any fossils would be broken and fragmented.

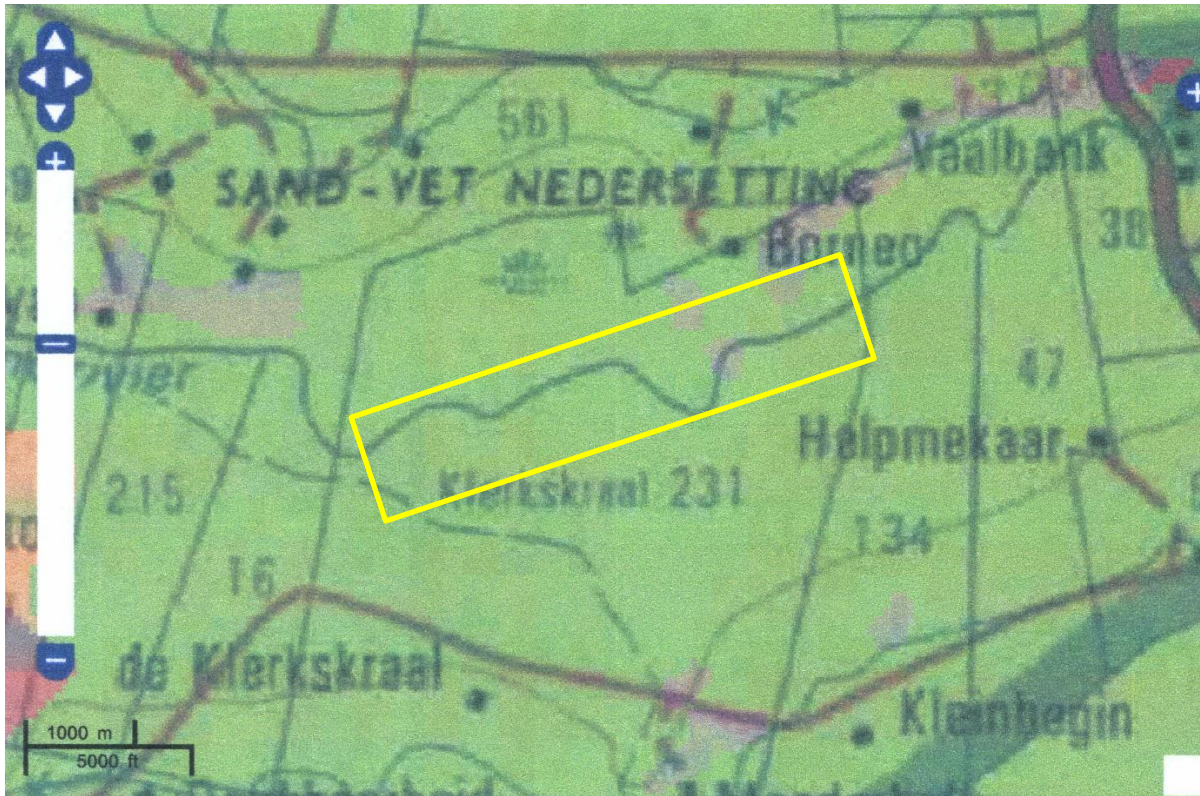


Figure 5: SAHRIS palaeosensitivity map for the site for the proposed Mining Right on Farm De Klerks Kraal shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

From the SAHRIS map above the area is indicated as moderately sensitive (green) for the Quaternary alluvium and sand.

4. Impact assessment

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

Table 3a: Criteria for assessing impacts

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.

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

Table 3b: Impact Assessment

PART B: Assessment		
SEVERITY/NATURE	H	-
	M	-
	L	River sands do not preserve fossils; so far there are no records from the Quaternary of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be negligible
	L+	-
	M+	-
	H+	-
	DURATION	L
M		-
H		Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since the only possible fossils within the area would be transported and fragmented robust fossil in the Quaternary sands, the spatial scale will be localised within the site boundary.
	M	-
	H	-

PART B: Assessment		
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any intact or recognisable fossils would be found in the loose soils and sands that cover the area and that will be mined. Nonetheless, a Fossil Chance Find Protocol should be added to the eventual EMPr.

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the sands are much too young to contain fossil. Furthermore, the material to be mined is sand and this does not preserve fossils. Since there is an extremely small chance that fossils may have been transported from the catchment area, and are large enough to identify a Fossil Chance Find Protocol has been added to this report. Taking account of the defined criteria, the potential impact to fossil heritage resources is extremely low.

5. Assumptions and uncertainties

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the dolerites, sandstones, shales and sands are typical for the country and do not contain fossil plant, insect, invertebrate and vertebrate material. The sands of the Quaternary period would not preserve fossils. It is unknown if any fossils might have been transported by the river together with the sands.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the transported sands of the Quaternary. There is a very small chance that fossil fragments may have been transported and could be recovered by the contractor, miners, environmental officer, or other responsible person once mining has commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample. The impact on the palaeontological heritage would be low so the project should be authorised.

7. References

Johnson, M.R., van Vuuren, C.J., Visser, J.N.J., Cole, D.I., Wickens, H.deV., Christie, A.D.M., Roberts, D.L., Brandl, G., 2006. Sedimentary rocks of the Karoo Supergroup. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 461 – 499.

Partridge, T.C., Botha, G.A., Haddon, I.G., 2006. Cenozoic deposits of the interior. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 585-604.

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

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the excavations / mining activities begin.

1. The following procedure is only required if fossils are seen on the surface and when mining commences.
2. When excavations begin the sand must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone, coal) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones (for example see Figure 6). This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the environmental officer/miners then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
8. If no fossils are found and the excavations have finished then no further monitoring is required.

9. Appendix A – Examples of fossils from the Quaternary fluvial deposits



Figure 6: Field photographs of transported fossils from several Quaternary deposits.

10. Appendix B – Details of specialist

**Curriculum vitae (short) - Marion Bamford PhD
January 2022**

I) Personal details

Surname : **Bamford**
First names : **Marion Kathleen**
Present employment: Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa
Telephone : +27 11 717 6690
Fax : +27 11 717 6694
Cell : 082 555 6937
E-mail : marion.bamford@wits.ac.za ;
marionbamford12@gmail.com

ii) Academic qualifications

Tertiary Education: All at the University of the Witwatersrand:

1980-1982: BSc, majors in Botany and Microbiology. Graduated April 1983.

1983: BSc Honours, Botany and Palaeobotany. Graduated April 1984.

1984-1986: MSc in Palaeobotany. Graduated with Distinction, November 1986.

1986-1989: PhD in Palaeobotany. Graduated in June 1990.

NRF Rating: C-2 (1999-2004); B-3 (2005-2015); B-2 (2016-2020); B-1 (2021-2026)

iii) Professional qualifications

Wood Anatomy Training (overseas as nothing was available in South Africa):

1994 - Service d'Anatomie des Bois, Musée Royal de l'Afrique Centrale, Tervuren, Belgium, by Roger Dechamps

1997 - Université Pierre et Marie Curie, Paris, France, by Dr Jean-Claude Koeniguer

1997 - Université Claude Bernard, Lyon, France by Prof Georges Barale, Dr Jean-Pierre Gros, and Dr Marc Philippe

iv) Membership of professional bodies/associations

Palaeontological Society of Southern Africa

Royal Society of Southern Africa - Fellow: 2006 onwards

Academy of Sciences of South Africa - Member: Oct 2014 onwards

International Association of Wood Anatomists - First enrolled: January 1991

International Organization of Palaeobotany - 1993+

Botanical Society of South Africa

South African Committee on Stratigraphy - Biostratigraphy - 1997 - 2016

SASQUA (South African Society for Quaternary Research) - 1997+

PAGES - 2008 -onwards: South African representative

ROCEEH / WAVE - 2008+

INQUA - PALCOMM - 2011+onwards

vii) Supervision of Higher Degrees

All at Wits University

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

viii) Undergraduate teaching

Geology II - Palaeobotany GEOL2008 - average 65 students per year

Biology III - Palaeobotany APES3029 - average 45 students per year

Honours - Evolution of Terrestrial Ecosystems; African Plio-Pleistocene Palaeoecology;

Micropalaeontology - average 12-20 students per year.

ix) Editing and reviewing

Editor: *Palaeontologia africana*: 2003 to 2013; 2014 - Assistant editor

Guest Editor: *Quaternary International*: 2005 volume

Member of Board of Review: *Review of Palaeobotany and Palynology*: 2010 -

Associate Editor Open Science UK: 2021 -
Review of manuscripts for ISI-listed journals: 30 local and international journals
Reviewing of funding applications for NRF, PAST, NWO, SIDA, National Geographic,
Leakey Foundation

x) Palaeontological Impact Assessments

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

- Mala Mala 2017 for Henwood
- Modimolle 2017 for Green Vision
- Klipoortjie and Finaalspan 2017 for Delta BEC
- Ledjadja borrow pits 2018 for Digby Wells
- Lungile poultry farm 2018 for CTS
- Olienhout Dam 2018 for JP Celliers
- Isondlo and Kwasobabili 2018 for GCS
- Kanakies Gypsum 2018 for Cabanga
- Nababeep Copper mine 2018
- Glencore-Mbali pipeline 2018 for Digby Wells
- Remhoogte PR 2019 for A&HAS
- Bospoort Agriculture 2019 for Kudzala
- Overlooked Quarry 2019 for Cabanga
- Richards Bay Powerline 2019 for NGT
- Eilandia dam 2019 for ACO
- Eastlands Residential 2019 for HCAC
- Fairview MR 2019 for Cabanga
- Graspan project 2019 for HCAC
- Lieliefontein N&D 2019 for EnviroPro
- Skeerpoort Farm Mast 2020 for HCAC
- Vulindlela Eco village 2020 for 1World
- KwaZamakhule Township 2020 for Kudzala
- Sunset Copper 2020 for Digby Wells
- McCarthy-Salene 2020 for Prescali
- VLNR Lodge 2020 for HCAC
- Madadeni mixed use 2020 for EnviroPro
- Frankfort-Windfield Eskom Powerline 2020 for 1World
- Beaufort West PV Facility 2021 for ACO Associates
- Copper Sunset MR 2021 for Digby Wells
- Sannaspos PV facility 2021 for CTS Heritage
- Smithfield-Rouxville-Zastron PL 2021 for TheroServe

xi) Research Output

Publications by M K Bamford up to January 2022 peer-reviewed journals or scholarly books: over 160 articles published; 5 submitted/in press; 10 book chapters.
Scopus h-index = 30; Google scholar h-index = 35; -i10-index = 92
Conferences: numerous presentations at local and international conferences.