

**Palaeontological Impact Assessment for the
proposed Seed Multiplication Project for
Dundee Research Station,
KwaZulu Natal Province**

Desktop Study (Phase 1)

For

**Thelsa Trading and Projects &
Ukubhukuda Trading & Project 165cc**

07 October 2023

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, mASSAf, PSSA
Experience: 34 years research and lecturing in Palaeontology
26 years PIA studies and over 350 projects completed

Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Ukubhukuda Trading & Project 165cc, South Africa. The views expressed in this report are entirely those of the author and no other interest was displayed during the decision making process for the Project.

Specialist: Prof Marion Bamford

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

Signature:

Executive Summary

A Palaeontological Impact Assessment was requested for the proposed clearing of agricultural land for the purpose of a Seed Multiplication Project for Dundee Research Station. The plot of land is northeast of the town of Dundee, adjacent to the R68, KwaZulu Natal 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 site lies on the potentially very highly sensitive Vryheid Formation but has been used for agricultural purposes in the past so it has been cleared and ploughed. The area is covered with soils and grassland. It is very unlikely that any fossils, if ever present, remain on the ground surface. Therefore, a Fossil Chance Find Protocol should be added to the EMP. Based on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the contractor, environmental officer or other designated responsible person once ploughing activities have commenced. Since the impact will be low, as far as the palaeontology is concerned, the project should be authorised.

ASPECT	SCREENING TOOL SENSITIVITY	VERIFIED SENSITIVITY	OUTCOME STATEMENT/ PLAN OF STUDY	RELEVANT SECTION MOTIVATING VERIFICATION
Palaeontology	Very High	Low	Paleontological Impact Assessment	Section 7.2. SAHRA Requirements

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1. Background

A Palaeontological Impact Assessment was requested for the proposed clearing of agricultural land for the purpose of a Seed Multiplication Project for Dundee Research Station. The plot of land is northeast of the town of Dundee, adjacent to the R68, KwaZulu Natal Province.

The project will only impact the soils as it is an extension of the research work that takes place at the agricultural research station.

A Palaeontological Impact Assessment was requested for the Dundee Research Station project. 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
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

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
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

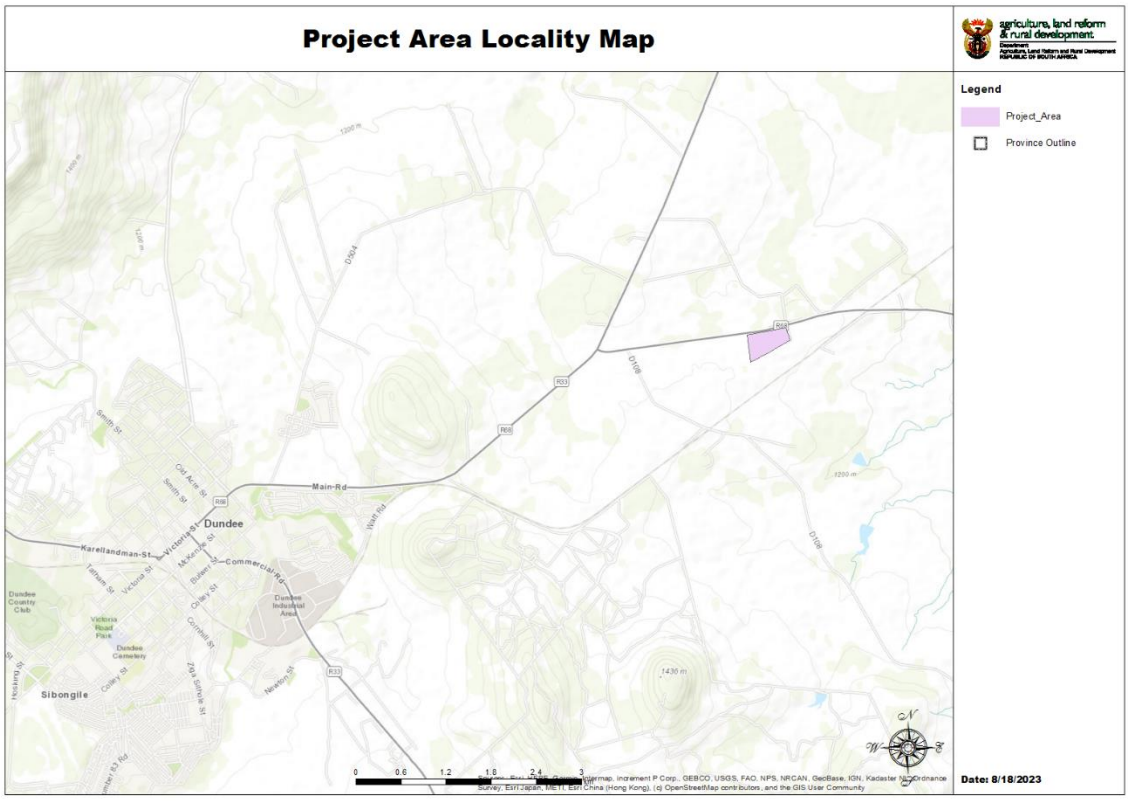


Figure 1: Locality map of the general area to show the relative land marks. The project is shown by the lilac polygon.



Figure 2: Aerial Map of the proposed field for the Seed Multiplication Project for Dundee Research Station – red outline. Map supplied by Thelsa.



Figure 3: Photograph from the northern margin of the field looking north across the R68 at the existing housing. (Courtesy of Thelsa).



Figure 4: Photograph from the northern border of the field southwards across the field to be planted for the project. (Courtesy of Thelsa).

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; eg <https://sahris.sahra.org.za/map/palaeo>
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

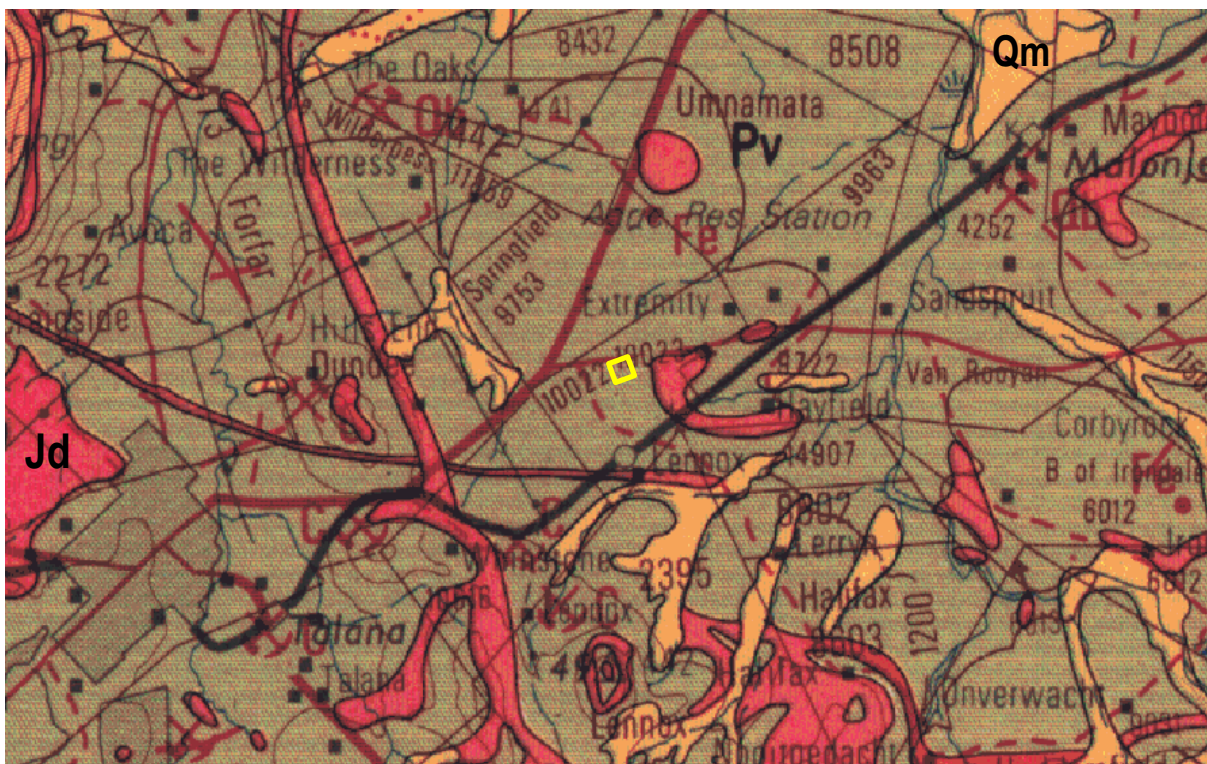


Figure 5: Geological map of the area around the Dundee Research Station. The location of the proposed project is indicated within the yellow rectangle. Abbreviations of the rock

types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2830 Dundee.

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
Qm	Masotcheni Fm, Quaternary sands	Yellow-brown sandy clay with basal boulder bed	Quaternary Ca 1 Ma to Present
Jd	Jurassic dykes	Dolerite dykes, intrusive	Jurassic, Ca 183 Ma
Pv	Vryheid Fm, Ecca Group, Karoo SG	Shale, siltstone, sandstone, coal seams	Early Permian Ca 290-280 Ma

The project lies in the northeastern part of the Main Karoo Basin where the lower strata are exposed. Large areas of dolerite that have intruded through the Karoo Basin sediments are exposed in the area (Figure 5). Much younger Quaternary sediments fill the river valleys and depressions.

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 (Visser, 1986, 1989; Isbell et al., 2012). 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. They comprise tillites, diamictites, mudstones, siltstones and sandstones that were deposited as the basin filled. This group has been divided into two formations with Elandsvlei Formation occurring throughout the basin and the upper Mbizane Formation occurring only in the Free State and KwaZulu Natal (Johnson et al., 2006).

Overlying the Dwyka Group rocks are rocks of the Ecca Group that are Early Permian in age. There are eleven formations recognised in this group but they do not all extend throughout the Karoo Basin. In the Free State, Mpumalanga and KwaZulu Natal, from the base upwards are the Pietermaritzburg Formation, Vryheid Formation and the Volksrust Formation. All of these sediments have varying proportions of sandstones, mudstones, shales and siltstones and represent shallow to deep water settings, deltas, rivers, streams and overbank depositional environments.

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.

Unconformably overlying the Karoo strata are eroded and reworked sands and gravel that have accumulated in river valleys and depressions. They are difficult to date but were deposited after erosion of the uplifted southern continent (Botha, 2020).

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 6. The site for development is in the Vryheid Formation (red).



Figure 6: SAHRIS palaeosensitivity map for the site for the proposed project for Dundee Research Station shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

The **Vryheid Formation** lies on the uneven topography of pre-Karoo or Dwyka Group rocks in the northern and northwestern margins but lies directly on the Pietermaritzburg Formation in the central and eastern part. The lithofacies show a number of upward-coarsening cycles, some very thick, and they are essentially deltaic in origin. There are also delta-front deposits, evidence of delta switching, and fluvial deposits with associated meandering rivers, braided streams, back swamps or interfluves and abandoned

channels (Cadle et al., 1993; Cairncross, 1990; 2001; Johnson et al., 2006). Coal seams originated where peat swamps developed on broad abandoned alluvial plains, and less commonly in the back swamps or interfluves. Most of the economically important coal seams occur in the fluvial successions (ibid). In the east (Mpumalanga and northern KwaZulu Natal), the Vryheid formation can be subdivided into a lower fluvial-dominated deltaic interval, a middle fluvial interval, and an upper fluvial-dominated deltaic interval again (Taverner-Smith et al., 1988).

The Vryheid Formation preserves the distinctive Gondwanan flora, the *Glossopteris* flora. As the climate warmed up and the huge continent drifted polewards the land was rapidly colonised by luxuriant vegetation, in some parts. Peats formed in waterlogged environments and over time were buried, preserved and altered by heat and pressure to eventually form the coal seams typical of this formation and abundant in Mpumalanga and KwaZulu Natal coalfields. Coals themselves do not preserve the original plant structures, but plant impressions or compressions can be preserved in the lenses between the coals or in fine grained sediments. The flora is composed of the dominant *Glossopteris* plants (leaves, seeds, reproductive structures, roots and wood). Other plants are lycopods, sphenophytes, ferns, cordaitaleans and other early gymnosperms. Vertebrates are not found with the fossil plants because they require a different set of conditions for preservations. Plants require rapid burial in a reducing and anoxic environment, while bones can be preserved in oxidizing environments (Cowan, 1995).

From the SAHRIS map above the area is indicated as very highly sensitive (red) but is close to dolerite. Dolerite does not preserve fossils because it is igneous in origin and it tends to destroy any fossils in the near vicinity. The area is covered in soils and grassland (see photographs in Figures 3-4) and soils do not preserve fossils. There is small chance that fossils may occur below the ground surface but would not be visible until ploughing started. Since the seed multiplication project will only take place in the soil layers it will not impact on the fossil heritage, even if fossils occur in the shales below the soils.

4. Impact assessment

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

Table 3a: Criteria for assessing impacts

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.
	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.

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

Table 3b: Impact Assessment

PART B: Assessment		
SEVERITY/NATURE	H	-
	M	-
	L	Soils do not preserve fossils; so far there are no records from the Vryheid Fm of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be negligible
	L+	-
	M+	-
	H+	-
	DURATION	L
M		-
H		Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since the only possible fossils within the area would be fossil plants of the <i>Glossopteris</i> flora in the shales of the Vryheid Fm, the spatial scale will be localised within the site boundary.
	M	-
	H	-
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any fossils would be found in the loose soils and sands that cover the area or in the Vryheid Fm. 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 rocks are the right type and age to contain fossils but the seed multiplication project will only impact the soil layer, not anything below the soils. Soils do not preserve fossils. Since there is an extremely small chance that fossils from the Vryheid Formation may be disturbed 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 low.

5. Assumptions and uncertainties

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

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the overlying soils of the Quaternary. The project will only impact the non-fossiliferous soils. There is an extremely small chance that fossils may occur below the soils in the shales of the Vryheid Formation so a Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the environmental officer, or other responsible person once ploughing 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 as far as the palaeontology is concerned, the project should be authorised.

ASPECT	SCREENING TOOL SENSITIVITY	VERIFIED SENSITIVITY	OUTCOME STATEMENT/ PLAN OF STUDY	RELEVANT SECTION MOTIVATING VERIFICATION
Palaeontology	Very High	Low	Paleontological Impact Assessment	Section 7.2. SAHRA Requirements

7. References

- Anderson, J.M., Anderson, H.M., 1985. Palaeoflora of Southern Africa: Prodrumus of South African megafloras, Devonian to Lower Cretaceous. A.A. Balkema, Rotterdam. 423 pp.
- Cadle, A.B., Cairncross, B., Christie, A.D.M., Roberts, D.L., 1993. The Karoo basin of South Africa: the type basin for the coal bearing deposits of southern Africa. International Journal of Coal Geology 23, 117-157.

Cairncross, B. 1990. Tectono-sedimentary settings and controls of the Karoo Basin Permian coals, South Africa. *International Journal of Coal Geology* 16: 175-178.

Cairncross, B. 2001. An overview of the Permian (Karoo) coal deposits of southern Africa. *African Earth Sciences* 33: 529–562.

Cowan, R., 1995. *History of Life*. 2nd Edition. Blackwell Scientific Publications, Boston. 462pp.

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.

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.

Taverner-Smith, R., Mason, T.R., Christie, A.D.M., Smith, A.M., van der Spuy, M., 1988. Sedimentary models for coal formation in the Vryheid Formation, northern Natal. *Bulletin of the Geological Survey of South Africa*, 94. 46pp.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once ploughing activities begin.

1. The following procedure is only required if fossils are seen on the surface and when ploughing commences.
2. When excavations begin the rocks and discard must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone or 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 7). 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 developer/environmental officer 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 an AMAFA or SAHRA

permit must be obtained. Annual reports must be submitted to AMAFA and 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 AMAFA and 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 Vryheid Formation



Figure 7: Photographs of fossils plants as seen in the field from the Vryheid Formation.

10. Appendix B – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD July 2023

Present employment: Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DSI Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa

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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.

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

v) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
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Honours	13	0
Masters	13	3
PhD	13	7
Postdoctoral fellows	14	4

vi) Undergraduate teaching

Geology II – Palaeobotany GEOL2008 – average 65 students per year

Biology III – Palaeobotany APES3029 – average 25 students per year

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

Micropalaeontology – average 12 - 20 students per year.

vii) 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: *Cretaceous Research*: 2018-2020

Associate Editor: *Royal Society Open*: 2021 -

Review of manuscripts for ISI-listed journals: 30 local and international journals

viii) Palaeontological Impact Assessments

25 years' experience in PIA site and desktop projects

- Selected from recent projects only – list not complete:
- 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
- Glosam Mine 2022 for AHSA
- Wolf-Skilpad-Grassridge OHPL 2022 for Zutari
- Iziduli and Msenge WEFs 2022 for CTS Heritage
- Hendrina North and South WEFs & SEFs 2022 for Cabanga
- Dealesville-Springhaas SEFs 2022 for GIBB Environmental
- Vhuvhili and Mukondelei SEFs 2022 for CSIR
- Chemwes & Stilfontein SEFs 2022 for CTS Heritage
- Equestria Exts housing 2022 for Beyond Heritage
- Zeerust Salene boreholes 2022 for Prescali
- Tsakane Sewer upgrade 2022 for Tsimba
- Transnet MPP inland and coastal 2022 for ENVASS
- Ruighoek PRA 2022 for SLR Consulting (Africa)
- Namli MRA Steinkopf 2022 for Beyond Heritage

ix) Research Output

Publications by M K Bamford up to July 2023 peer-reviewed journals or scholarly books: over 170 articles published; 5 submitted/in press; 14 book chapters.

Scopus h-index = 31; Google Scholar h-index = 39; -i10-index = 116 based on 6568 citations.

Conferences: numerous presentations at local and international conferences.

