





ASSESSMENT **PALAEONTOLOGICAL** FOR DESKTOP THE **PROPOSED** IMPROVEMENTS OF THE R33 NATIONAL ROAD SECTION 12: FROM N1 (KM 77.0) TO SECTION 13 MODIMOLLE (KM 0.6), LIMPOPO PROVINCE.

Issue Date: 28 July 2022

Revision No.: v0.1

Client: Environmental Edge (Pty) Ltd

PGS Project No:











PO Box 32542, Totiusdal, 0134

Declaration of Independence

I, Elize Butler, declare that -

General declaration:

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

Disclosure of Vested Interest

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

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SIGNATURE:

ACKNOWLEDGEMENT OF RECEIPT

Report Title	Palaeontological Desktop Assessment for the proposed Improvements of the R33 National Road Section 12: from N1 (Km 77.0) to Section 13 Modimolle (Km 0.6), Limpopo Province.		
Control	Name	Signature	Designation
Author	Elize Butler	Eitler.	Palaeontologist
Reviewed			Archaeologist/Heritage Specialist/Project Manager – PGS Heritage

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 EIA Regulations of 7 April 2017	Relevant section in report	Comment where not applicable.
LIA Regulations of 7 April 2017	Page ii and Section 2 of	пот аррпсавле.
1.(1) (a) (i) Details of the specialist who	Report – Contact details	
prepared the report	and company and	-
prepared the report	Appendix A	
(ii) The expertise of that person to	дрреник д	
compile a specialist report including a	Section 2 – refer to	
curriculum vitae	Appendix 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	Occilon 5	
acceptable change;		
(d) The duration, date and season of the		
site investigation and the relevance of		Desktop
the season to the outcome of the		Assessment
assessment		
(e) a description of the methodology		
adopted in preparing the report or	Section 7 Approach and	
carrying out the specialised process	Methodology	-
inclusive of equipment and modelling		
used		
(f) details of an assessment of the		
specific identified sensitivity of the	Section 1 and 10	
site related to the proposed activity or		

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	Section 5	areas of sensitivity
avoided, including buffers		identified
(h) A map superimposing the activity		
including the associated structures		
and infrastructure on the	Section 5 – Geological	
environmental sensitivities of the site	and Palaeontological	
including areas to be avoided,	history	
including buffers;		
(i) A description of any assumptions made	Section 7.1 –	-
and any uncertainties or gaps in	Assumptions and	
knowledge;	Limitation	
(j) A description of the findings and	Limitation	
potential implications of such findings	Coation 1 and 10	
on the impact of the proposed activity,	Section 1 and 10	
including identified alternatives, on the		
environment		
(k) Any mitigation measures for inclusion	Section 1 and 10	
in the EMPr		
(I) Any conditions for inclusion in the	Section 1 and 10	
environmental authorisation		
(m) Any monitoring requirements for		
inclusion in the EMPr or environmental	Section 1 and 10	
authorisation		
(n)(i) A reasoned opinion as to whether		
the proposed activity, activities or		
portions thereof should be authorised		
and	Section 1 and 10	
(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	0 " 1 115	
thereof should be authorised, any	Section 1 and 10	
avoidance, management and		

Requirements of Appendix 6 - GN R326	Relevant section in	Comment where
EIA Regulations of 7 April 2017	report	not applicable.
mitigation measures that should be		
included in the EMPr, and where		
applicable, the closure plan		
(o) A description of any consultation		
process that was undertaken during	N/A	
the course of carrying out the study		
(p) A summary and copies if any		
comments that were received during	N/A	
any consultation process		
(q) Any other information requested by the	N/A	
competent authority.	14/71	
(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 the Palaeontological Desktop Assessment (PDA) to assess the proposed Improvements of the R33 National Road Section 12: from N1 (Km 77.0) to Section 13 Modimolle (Km 0.6) in Limpopo Province. In accordance with the National Environmental Management Act 107 of 1998 (NEMA) and to comply 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 planned development area and to evaluate the potential impact of the proposed development on the Palaeontological Heritage of the area.

The proposed development is underlain by diabase as well as the Alma and Swaershoek Formations (Nylstroom Subgroup, Waterberg Group). According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of diabase is Zero while that of the Nylstroom Subgroup (Waterberg Group) is Moderate (Almond and Pether 2008, SAHRIS website).

A Low Significance has been allocated to the development. It is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The construction and operation of the project may be authorised, as the whole extent of the development footprint is not considered sensitive in terms of palaeontological heritage. If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Control Officer (ECO) in charge of these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a palaeontologist.

It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

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Curriculum Vitae Elize Butler

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.

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

The South African National Road Agency Soc Ltd plans to upgrade the R33 National Road within the Waterberg District Municipality and Modimole-Mookgopong Local Municipality (Limpopo Province) (**Figure 1-2**).

A traffic analysis conducted in 2019 indicated that the R33 experienced high traffic volumes and consequently needs to be upgraded to accommodate the increased traffic. The proposed road upgrade starts at Section 12 (km 77,0) and ends at Section 13 (km 0,6) about 600m after the intersection of R33 and R101.

1.1 PROJECT INFORMATION

The total length of the project is 12.3 km's. The project is divided into two distinct sections namely:

- Section 12 Km 77.0 to Km 86.0 (10.0km): This section has rural characteristics.
- Section 12 Km 86.0 to Section 13 Km 0.6 (2.3km): This section has urban characteristics¹.

The basic scope of work is as follows:

- Road widening to meet the minimum requirements of a Class 2 road that has an AADT of greater that 3000 veh/day, as recommended by SANRAL,
- Capacity upgrades in line with the traffic report
- Correction of horizontal geometry at some sections,
- Correction of vertical geometry at some sections,
- Upgrade/reinstatement of existing stormwater infrastructure,
- Intersection upgrades,
- Verge clearance to improve sight distance along the project route.
- Pavement strengthening by in-situ recycling and base import followed by double seal surfacing along the rural section,
- Box cutting and bitumen treated base (BTB) construction followed by asphalt surfacing along the urban section,
- Upgrade of river bridge and major culvert,
- Widening of a rail bridge
- · Reinstatement and provision of road signage/markings, and
- Construction of a hawker facility at the beginning of the urban section.
- Upgrading of pedestrian walkways along the R33, with emphasis on the urban section
- Proper pedestrian accommodation at every signalised intersection (i.e. pedestrian signals with adequate time to cross the road and visible road marking indicating a pedestrian crossing)
- Special emphasis should be placed on Joe Slovo Drive and the R101 Thabo Mbeki Drive intersections due to the very high pedestrian activity at these intersections
- Upgrading of pedestrian facilities adjacent to the railway bridge (Km 86.75) 1.

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1.2 TECHNICL DECRIPTION

Major aspects of the project include:

- Strengthening of the existing pavement, general widening of the existing road cross section for capacity improvements and 3.0m surface shoulders,
- Substantial vertical and horizontal geometric improvements, widening of railway bridge and some major and minor culverts,
- Construction of 2 new river bridges
- Widening of existing agricultural underpass
- Possible 6.5 wide temporary deviation to accommodate two-way traffic during construction
- Stockpile areas and vegetation clearance outside road reserve in excess of one hectare1.

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, 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. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

Palaeontological Desktop Assessment for the proposed R33 National Road upgrade in Limpopo

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¹ Information provided by Environmental Edge (Pty) Ltd

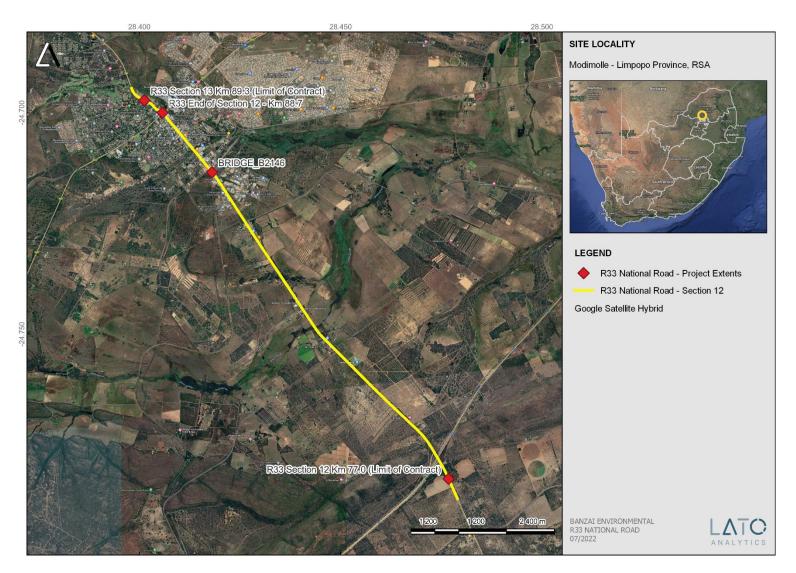


Figure 1: Google Earth Image (2022) depicting the proposed R33 National Road upgrade within the Modimole-Mookgopong Local Municipality, Limpopo Province.

Palaeontological Desktop Assessment for the proposed R33 National Road upgrade in Limpopo 16 September 2022

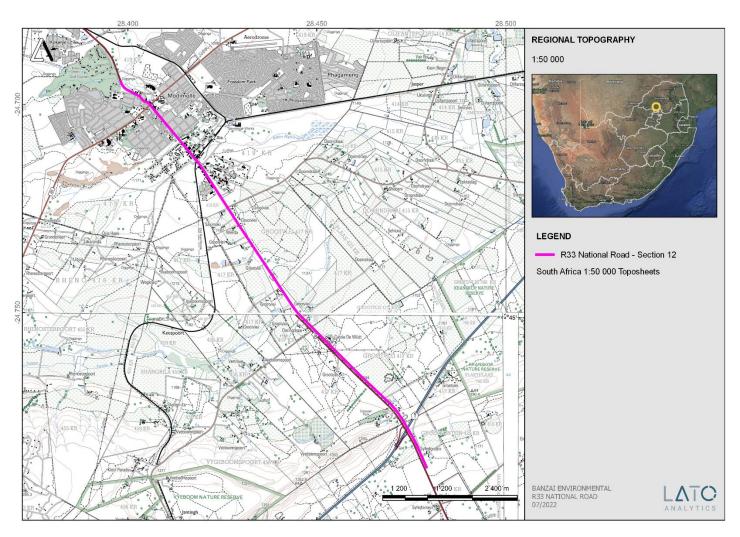


Figure 2: Extract of the 150 000 topographical maps indicating the location of the R33 National Road upgrade within the Modimole-Mookgopong Local Municipality, Limpopo Province.

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

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

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and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage".

In agreement with legislative requirements, EIA rating standards as well as SAHRA policies the following comprehensive and legally compatible PIA report have been compiled.

Palaeontological heritage is exceptional and non-renewable and is protected by the NHRA. Palaeontological resources and may not be unearthed, broken moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.

This Palaeontological Impact assessment forms part of the Heritage Impact Assessment (HIA) and adhere to the conditions of the Act. According to Section 38 (1), an HIA is required to assess any potential impacts to palaeontological heritage within the development footprint where:

- the construction of a road, wall, power line, pipeline, canal or other similar form of linear development or barrier exceeding 300 m in length.
- the construction of a bridge or similar structure exceeding 50 m in length.
- any development or other activity which will change the character of a site—
- (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.

4 OBJECTIVE

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

Palaeontological Desktop Assessment for the proposed R33 National Road upgrade in Limpopo 16 September 2022 The palaeontological status of each rock section is calculated as well as the possible impact of the development on fossil heritage by a) the palaeontological importance of the rocks, b) the type of development and c) the quantity of bedrock removed.

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

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

The terms of reference of a PIA are as follows:

General Requirements:

- Adherence to the content requirements for specialist reports in accordance with Appendix 6 of the EIA Regulations 2014, as amended.
- Adherence to all applicable best practice recommendations, appropriate legislation and authority requirements.
- Submit a comprehensive overview of all appropriate legislation, guidelines.
- Description of the proposed project and provide information regarding the developer and consultant who commissioned the study.
- Description and location of the proposed development and provide geological and topographical maps.
- Provide Palaeontological and geological history of the affected area.
- Identification sensitive areas to be avoided (providing shapefiles/kml's) in the proposed development.
- Evaluation of the significance of the planned development during the Pre-construction, Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect, and cumulative:
 - a. Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.

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- b. Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity.
- c. Cumulative impacts result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present, or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development;
- Implications of specialist findings for the proposed development (such as permits, licenses etc).

5 **GEOLOGICAL AND PALAEONTOLOGICAL HISTORY**

The geology of the R33 National Road upgrade within the Modimole-Mookgopong Local Municipality, Limpopo Province is depicted on the 1:250 000 2428 Nylstroom Geological Map (1978) (Council of Geoscience, Pretoria) (Figure 3-5, Table 3). The proposed development is underlain by diabase (d, green); Alma (Mag, stippled brown) and Swaershoek Formations (Ms, brown) of the Nylstroom Subgroup, Waterberg Group. Recent Shape files compiled by the Council of Geosciences (Pretoria) is depicted in Figure 6. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of diabase is Zero while that of the Nylstroom Subgroup (Waterberg Group) is Moderate (Almond and Pether 2008, SAHRIS website).

The diabase is igneous rocks and are thus considered to have no palaeontological significance. However, the existence of the diabase rocks would have had a thermal metamorphic effect on the adjoining Waterberg Group and would decrease the chance of fossils preservation in this Group.

The main Waterberg Basin is situated in the Limpopo Province (South Africa) and extends into eastern Botswana. Extensive research on the Waterberg Group has been conducted by Jansen (1982), Callaghan et al. (1991), Callaghan and Brandl (1991) and Callaghan (1993). It is estimated that the Waterberg Group is about 2700 to 7000 m or more thick. The Waterberg Group lies unconformably on the Transvaal Supergroup, the Archaeon Kaapvaal Craton as well as the Bushveld Complex, while the Blouberg Formation is overlain by the Mogalakwena Formation. The Waterberg Group has yet not been dated but dolerite intrusions in the upper Waterberg Group is dated at c. 1879 to 1872 Ma (Hanson et al., 2004).

The Waterberg Group is subdivided in the Nylstroom (oldest), Matlabas and Kransberg (youngest) Subgroups (Figure 3). All three Subgroups exhibits upwards-fining. The Waterberg Group is characterized by its dark greyish red colour. The red colour suggests an oxidizing environment when adequate free oxygen was available to oxides ferruginous minerals, creating the formation of

16 September 2022 Page 8 "red beds". These rocks are very hard and chemically resistant, producing remarkable cliffs with a high topography (McCarthy and Rubidge 2005).

The Alma Formation overlies the Swaershoek Formation (Nykstroom Subgroup) and consists of a sequence of medium- to coarse-grained arkoses, feldspathic arenites, lithic arkoses, as well as subarkoses and litharenites. Sediments of the Alma Formation were deposited as a group of alluvial fans, that forms a bajada along the scarp produced by an uplifted block, south of the Murchison strike-slip fault zone.

Informally the Swaershoek Formation is subdivided in the upper and lower parts. Deposition of the lower Swaershoek Formation is thought to have been penecontemporaneous with the Bushveld Complex granite intrusions. This Formation comprise of arenites and rudites, (Meinster, 1971) without Bushveld granite clasts. The upper part comprises mainly of fractured rudites and arenites with intercalated lutites. At the base is a thick lava unit with several lava flows higher in the system. Although disputed Callaghan (1993) maintained that the Swaershoek Formation was deposited as fan-deltas.

Table 3: Stratigraphic subdivision of the Waterberg Group in the main Waterberg Basin (based on SACS, 1980, Taken from Barker et al, 2006).

	Subgroups	Formations		
		South/southwest and central area	North/northeast and central area	Nylstroom Basin
	Kransberg	Vaalwater (≤475 m)	Vaalwater (≤475 m)	
WATERBERG GROUP		Cleremont (~125 m)	Cleremont (~125 m)	
		Sandriviersberg (1250 m)	Mogalakwena (≤1500 m)	
	Matlabas	Aasvoëlkop (≤600 m)	Makgabeng (≤1200 m)	
		Skilpadkop (≤600 m)	Setlaole (≤450 m)	
	Nylstroom	Alma (≤3000 m)		Alma (1200–1800 m)
		Swaershoek (≤1000 m)		Swaershoek (≤2500 m)

The Waterberg Group may contain trace fossils. Microbial mats have been recorded from younger sediments in the Waterberg Group in the Main Waterberg Basin, but to date not in the Nylstroom Basin. The black shales south-west of Potchefstroom comprises of overlapping laminated basal mounds that may be stromatolitic and spheroidal, indicating possible planktonic fossil algae (Nixon et al.,1988). These structures ranges in size from 3.5 - 17 mm high and up to 10 mm in diameter and may be present in the development.

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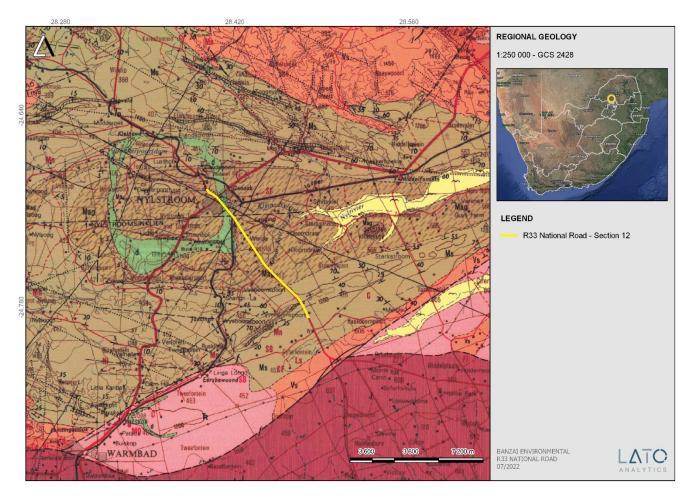


Figure 3: Extract of the 1:250 000 2428 Nylstroom Geological Map (1978) (Council of Geoscience, Pretoria) indicating the surface geology of the proposed development in yellow.

The study area is underlain by diabase (d, green); Alma Formation (Mag, stippled brown) and Swaershoek Formation (Ms, brown) of the Nylstroom Subgroup, Waterberg Group.

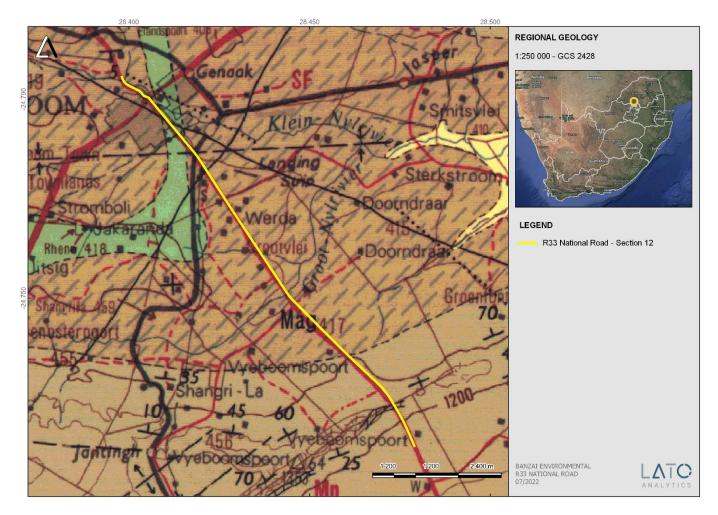


Figure 4: The proposed R33 National Road Upgrade is underlain by diabase (d, green); Alma Formation (Mag, stippled brown) and Swaershoek Formation (Ms, brown) of the Nylstroom Subgroup, Waterberg Group.

Table 4: Legend and short explanation of the 2428 Nylstroom Geological Map (1978) (Council of Geoscience, Pretoria).



Diabase, dolerite, other basic to intermediate rocks of various ages Diabaas, doleriet, ander basiese tot intermediêre gesteentes van verskeie ouderdomme



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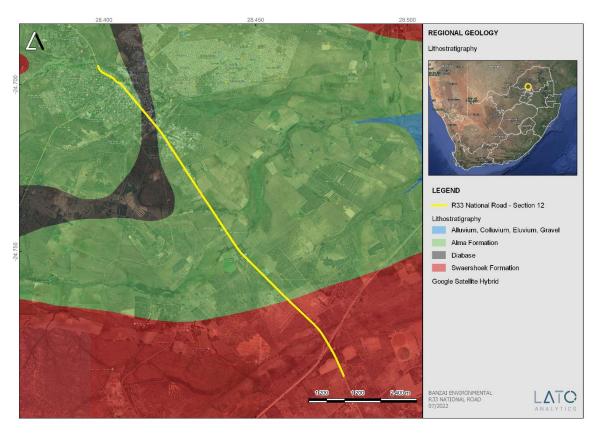


Figure 5: Geology indicated by Shape Files (Council for Geosciences, Pretoria.)

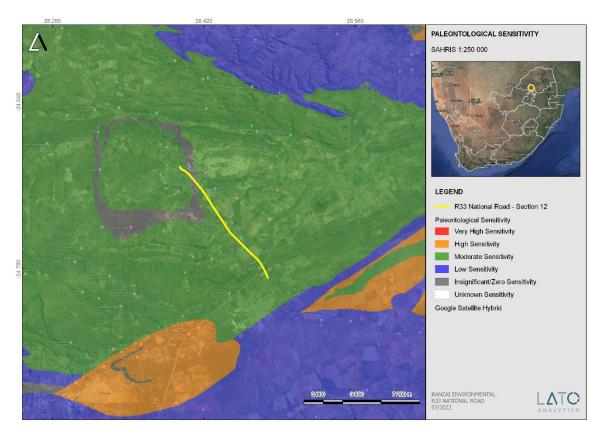


Figure 6: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed development in yellow.

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.
		The continue to populate the map.

According to the SAHRIS Palaeo Sensitivity map (Figure 64) the proposed development is underlain by sediments of Moderate (green) and Insignificant / Zero (grey) 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.

6 GEOGRAPHICAL LOCATION OF THE SITE

The locality of the R33 National Road upgrade is indicated in Figure 1-2.

The proposed road upgrade is starts at Section 12 (km 77,0) and ends at Section 13 (Km 0.6) in the town of Modimolle.

Table 5:GPS Coordinates

R33 National Roads Upgrade	Latitude	Longitude
Northern point	24°41'39.79"S	28°23'53.16"E
Southern point	24°47'13.81"S	28°28'44.42"E

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.

ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- Extract of the 2428 Nylstroom Geological Map (1978) (Council of Geoscience, Pretoria)
- A Google Earth map with polygons of the proposed development was obtained from PGS Consultants.
- PIAs in the area include Bamford, 2021, Fourie, H. and Rubidge ,B.S., 2015 (See references).

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9 IMPACT ASSESSMENT METHODOLOGY

IMPACT TABLE FORMAT			
	Description	Before Mitigation	After Mitigation
[Environmental Parameter] e.g., Biodiversity	Loss of Fossil Heritage		
Extent (Ex)	A brief description indicating the chances of the impact occurring.	1	1
Probability (Pr)	A brief description of the ability of the environmental components recovery after a disturbance as a result of the activity.	2	2
Reversibility (Re)	A brief description of the environmental aspect likely to be affected by the activity e.g. Surface water.	4	4
Irreplaceable loss of resources (L)	A brief description of the degree in which irreplaceable resources are likely to be lost.	4	4
Duration (D)	A brief description of the amount of time the activity is likely to take to its completion.	4	4
Cumulative effect (CE)	A brief description of whether the impact will be exacerbated as a result of the activity.	2	2
Intensity/magnitude (M)	A brief description of whether the impact has the ability to alter the functionality or quality of a system permanently or temporarily.	2	1
Significance Rating	A brief description of the importance of an impact which in turn dictates the level of mitigation required.	-34 (Negative Medium Impact)	-17 (Negative Low Impact)
Mitigation measures	If fossil remains or trace fossils are discovered during	g any phase of constr	ruction, either on the
	surface or exposed by excavations the Environmental Control Officer (ECO) in charge of		
	these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street,		
	Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21		
	462 4509. Web: <u>www.sahra.org.za</u>) so that mitigation can be carry out by a palaeontologist.		
	It is consequently recommended that no further palaeontological heritage studies, ground		
	truthing and/or specialist mitigation are required pending the discovery of newly discovered		
	fossils.		

10 FINDINGS AND RECOMMENDATIONS

The proposed development is underlain by diabase as well as the Alma and Swaershoek Formations (Nylstroom Subgroup, Waterberg Group). According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of diabase is Zero while that of the Nylstroom Subgroup (Waterberg Group) is Moderate (Almond and Pether 2008, SAHRIS website).

It is therefore considered that the proposed development will not lead to detrimental impacts on the palaeontological resources of the area. The project may be authorised, as the whole extent of the development footprint is not considered sensitive in terms of palaeontological heritage. If fossil remains or trace fossils are discovered during any phase of construction, either on the surface or exposed by excavations the Environmental Control Officer (ECO) in charge of these developments must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation can be carry out by a palaeontologist.

It is consequently recommended that no further palaeontological heritage studies, ground truthing and/or specialist mitigation are required pending the discovery of newly discovered fossils.

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APPENDIX A - ELIZE BUTLER CV

ELIZE BUTLER

CURRICULUM VITAE

ELIZE BUTLER

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 29 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

TECHNICAL REPORTS

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