



PALAEONTOLOGICAL DESKTOP ASSESSMENT

OPEN CAST MINE
ESTABLISHMENT AT
ASSMANG BLACK ROCK MINE
OPERATIONS, HOTAZEL,
NORTHERN CAPE PROVINCE

December 2022

COMPILED FOR ESCIENCE
ASSOCIATES (PTY) LTD



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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Banzai Environmental (Pty) Ltd

CONTACT PERSON:

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SIGNATURE:

A handwritten signature in black ink, appearing to read 'Elize Butler'.



The heritage 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: Checklist for Specialist studies in accordance with Appendix 6 of the EIA Regulations of 2014 (as amended).

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report	Comment where not applicable.
1.(1) (a) (i) Details of the specialist who prepared the report	Page ii and Section 3 of Report – Contact details and company and Appendix A	-
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 3 – refer to Appendix A	-
(b) A declaration that the person is independent in a form as may be specified by the competent authority	Page ii of the report	-
(c) An indication of the scope of, and the purpose for which, the report was prepared	Section 5 – Objective	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 6 – Geological and Palaeontological history	-
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 10	-
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment	Desktop Study	
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 8 Approach and Methodology	-
(f) details of an assessment of the specific identified sensitivity of the site related to the proposed activity or activities and its associated structures and infrastructure, inclusive of a site plan identifying site alternatives;	Section 1 and 11	
(g) An identification of any areas to be avoided, including buffers	Section 6	No buffers or areas of sensitivity identified



Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report	Comment where not applicable.
(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;	Section 6 – Geological and Palaeontological history	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 8.1 – Assumptions and Limitation	-
(j) A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 1 and 11	
(k) Any mitigation measures for inclusion in the EMPr	Section 12	
(l) Any conditions for inclusion in the environmental authorisation		None required
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 12	
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 and 11	
(n)(iA) A reasoned opinion regarding the acceptability of the proposed activity or activities; and		
(n)(ii) If the opinion is that the proposed activity, activities or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Section 1 and 11	-
(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 if any comments that were received during any consultation process	N/A	
(q) Any other information requested by the competent authority.	N/A	
(2) Where a government notice by the Minister provides for any protocol or minimum information requirement to be applied to a specialist report, the requirements as indicated in such notice will apply.	Section 4 compliance with SAHRA guidelines	



EXECUTIVE SUMMARY

Banzai Environmental was appointed by EScience to conduct the Palaeontological Desktop Assessment (PDA) to assess the proposed open cast mine for manganese bearing minerals and related minerals to the north of the existing Gloria mine. 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, to evaluate the potential impact of the proposed development on the Palaeontological Heritage.

The proposed new opencast mine at BRMO, near Hotazel, Northern Cape is completely underlain by the Cenozoic Kalahari Group, as well underlying Griqualand West Basin rocks of the Transvaal Supergroup. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Kalahari Group and that of the Griqualand West Basin rocks is moderate (Almond and Pether, 2009; Almond *et al.*, 2013). Various alternatives have been considered for the project. As the geology of these alternatives is the same there is no preferred alternative from a Palaeontological point of view.

It is therefore considered that the BRMO new opencast mine will not lead to detrimental impacts on the palaeontological resources of the area. Thus, the construction and operation of the new mine may be authorised as the whole extent of the development footprint is not considered sensitive in terms of palaeontological resources.

If Palaeontological Heritage is uncovered during surface clearing and excavations the **Chance find Protocol** attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out.

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.

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



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1 INTRODUCTION¹

Assmang (Pty) Ltd mines manganese ore in the Black Rock area of the Kalahari, in the Northern Cape Province. The ore is mined from the Kalahari Manganese field. The Black Rock Mine Operations (BRMO) are approximately 60 km north-west of the town of Kuruman, in close proximity to the town of Hotazel.

In 1940, Assmang acquired a manganese ore outcrop on a small hillock known as Black Rock. Several large properties underlain by ore were subsequently found and acquired. Manganese ore mining operations were extended and currently include 3 underground mining complexes:

- Gloria (commissioned in 1975) and producing medium grade carbonated ore
- Nchwaning II and Nchwaning III (commissioned in 1981 and 2004 respectively) and producing high grade ore.

BRMO proposes to establish an open cast mine for manganese bearing minerals and related minerals to the north of the existing Gloria mine. This mine will be referred to as the proposed **Gloria opencast mine**.

The proposed development includes activities listed in terms of the National Environmental Management Act (Act 107 of 1998), as well as the National Environmental Management: Waste Act, 2008 (Act 59 of 2008), and thus BRMO has applied for an Integrated Environmental Authorisation in terms of the National Environmental Management Act. A scoping and environmental impact assessment (EIA) process must be undertaken, in accordance with the environmental impact assessment regulations GN. R 982 of 2014 as amended, to authorise the proposed activities. The proposed development also requires other environmental management permits which include a water use Licence, heritage resources management permits or exemptions, protected tree removal permits, and protected plant removal and transport permits.

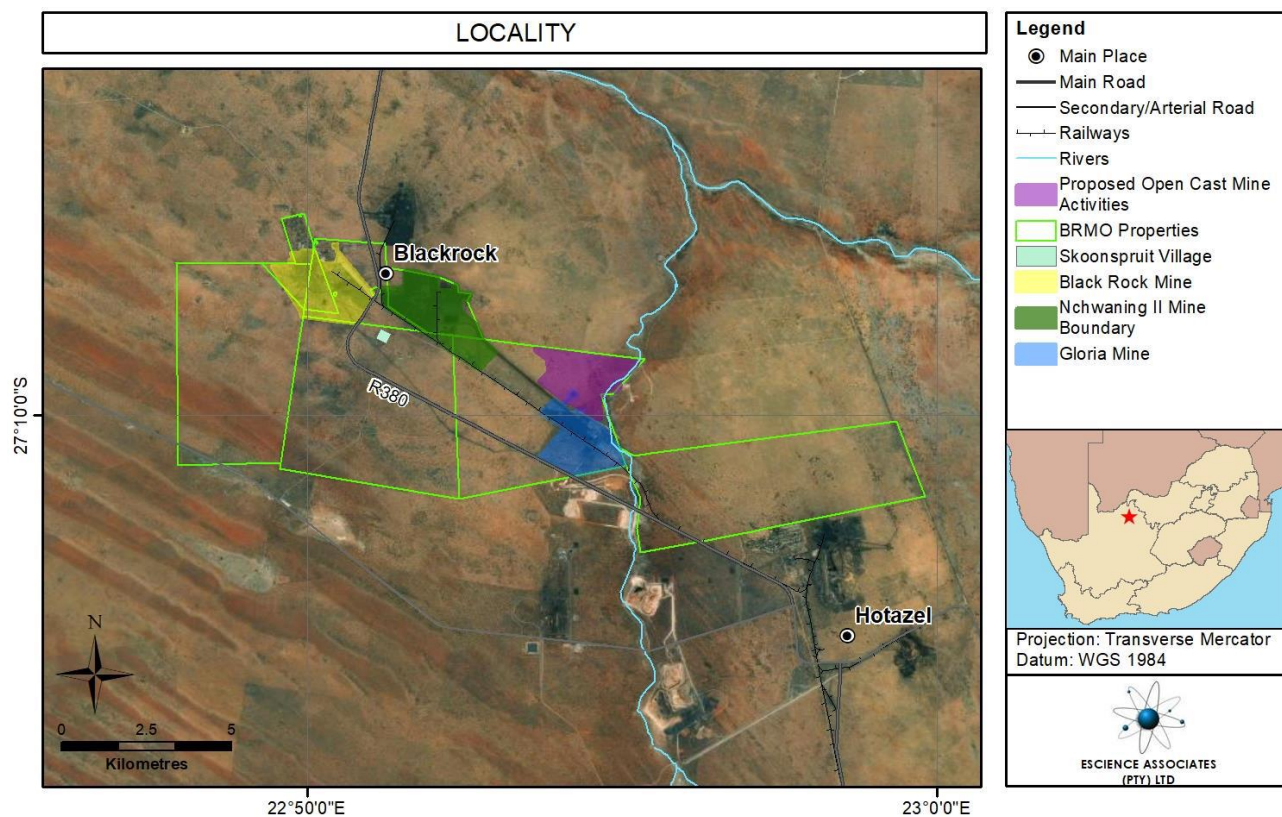


Figure 1: Location of Assmang Black Rock Mine Operations (BRMO).

1.1 ADMINISTRATIVE INFORMATION

Table 2: Name and Address of Mine Owner and Name of Mine

Company Registration	Assmang (Pty) Limited, Black Rock Mine Operations
Physical Address	1935/007343/06 Black Rock Mine Operations, Santoy, Northern Cape
Postal Address	PO Box 187, Santoy, Northern Cape, 8491
Telephone	053 751 5260
Fax	053 751 5555
Senior General Manager	Pierre Becker

Table 3 Details of Environmental Specialist

Name	Tshifhiwa Ravele
Physical Address	Main Offices Black Rock Mine Operations, Santoy, Northern Cape
Postal Address	PO Box 187, Santoy, Northern Cape, 8491
Telephone	053 751 5302
Fax	053 751 5555
Email	tshifhiwar@brmo.co.za



Table 4: Details of EAP

Name of Company	EScience Associates (Pty) Ltd.
Contact Person	Abdul Ebrahim
Postal Address	PO Box 2950, Saxonwold, Johannesburg, 2132,
Physical Address	9 Victoria Street, Oaklands, Johannesburg, 2192
Telephone	011 718 6380
Fax	072 268 1119
Email	abdul@escience.co.za
Qualifications	Certified EAP, BEng Honours Environmental Engineering
Curriculum Vitae	Refer to Appendix 1

Table 5: Mining Rights, Surface Rights and Title Deed Description Relevant to BRMO

Mine	Farm Name	Title Deed	Surface Rights	Mining Rights
FOR THIS APPLICATION				
Gloria	Ptn. 1 Gloria 266	No. 506 of 1966	Assmang (Pty) Ltd	Assmang (Pty) Ltd
OTHER SECTIONS OF BRMO RIGHTS				
Black Rock	Ptn. 1 Belgravia 264	No. 541 of 1940	Assmang (Pty) Ltd	Assmang (Pty) Ltd
Ptn. 1 Santoy 230	No. 1491 of 1970	Assmang (Pty) Ltd	Assmang (Pty) Ltd	Assmang (Pty) Ltd
Nchwaning II	Ptn. 1 Nchwaning II67	No. 541 of 1940	Assmang (Pty) Ltd	Assmang (Pty) Ltd
Ptn. 3 Nchwaning II67	No. 1491 of 1970	Assmang (Pty) Ltd	Assmang (Pty) Ltd	Assmang (Pty) Ltd

Table 6: Project Applicable Servitudes Relevant to this application.

Mine	Servitude Type	Servitude No.
Gloria	Rail	K38/83S
Gloria	Water pipeline (Sedibeng Water Vaal-Gamagara Supply)	K36/1978S

1.2 LAND TENURE AND ADJACENT LAND USE

Assmang (Pty) Ltd holds both the surface and mining rights over the properties encompassing the greater BRMO and its constituent mining operations (i.e., Black Rock, Nchwaning and Gloria Mines). The region surrounding BRMO is dominated by mining, industrial and agricultural (generally livestock production) land uses. Land in the immediate vicinity of BRMO that is not used for mining/industrial purposes, is utilised for livestock farming (i.e., sheep, goats, and cattle) and game farming (Refer to Figure 1-3).

A basic summary of nearby activities and built-up areas is presented in Table 7-8.

Table 7: Neighbouring Mining/Industrial Activity/ies

Mine/Industry	Distance/Direction from BRMO
Good Rock (Pty) Ltd	Eastern boundary of Nchwaning II Mine
East Manganese Mine	North western boundary of Gloria mine.
South 32 Wessels Manganese Mine	Approximately 1.3 km north of Nchwaning II Mine
Kalagadi Manganese Mine	Approximately 2.5 km south of Gloria Mine



South 32 Hotazel Manganese Mine

Approximately 7 km south east of Gloria Mine

Table 8: Neighbouring Towns

Town

Santoy (Black Rock Mine Village)

Hotazel

Kuruman

Upington

Kimberley

Distance/Direction from BRMO

Adjacent to BRMO

Approximately 17 km south east of BRMO

Approximately 80 km south east of BRMO

Approximately 267 km south west of BRMO

Approximately 320 km south east of BRMO

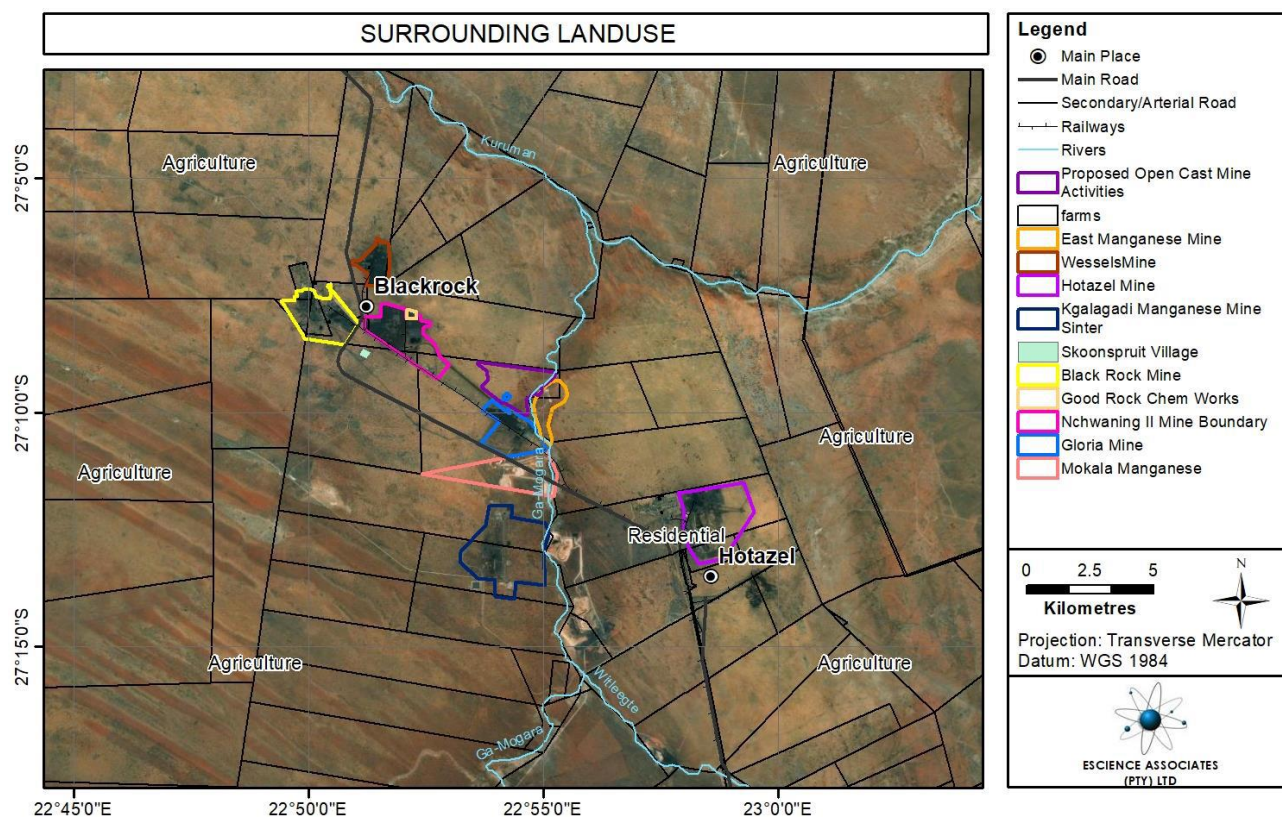


Figure 2: Land use.

2 DESCRIPTION OF CURRENT AND PROPOSED ACTIVITIES

2.1 Background

The general descriptions herein are intended to convey a broad understanding of the facilities and activities associated with the BRMO and the proposed development. These descriptions are not exhaustive. It should be noted that infrastructure typical of such mining activities is encountered on the site which may not be covered in specific detail herein. These facilities and infrastructure are subject to repairs, general maintenance and upgrading in accordance with standard practices, and thus will be altered from time to time. Current infrastructure is within the footprint of existing, historical, and/or authorised activities. Proposed infrastructure will require clearing of undisturbed land where it does not overlap with existing disturbed areas.

2.1.1 Existing Activities

Manganese mining has been undertaken at BRMO since 1938, although mining activities at the original Black Rock Mine have ceased. Operations at Gloria were commissioned in 1975, and Nchwaning II was first commissioned in 1981. A shaft was established at Nchwaning III in 2006. Nchwaning III is located within the



boundary of the Black Rock Mine admin and support activities, however this only a shaft with minimal associated surface activities.

The mine supplies high-grade manganese ore to both local and international markets. Only underground mining methods are presently utilised at BRMO. The mining method for Gloria, Nchwaning II and III, is via underground bord and pillar methods, making use of trackless machines and underground conveyer systems. The current authorised operations have a projected maximum capacity of 6.3 mtpa.

Ore extraction activities are all undertaken below surface. Ore is drilled, blasted, and crushed underground before being conveyed to the processing facilities on the surface. Operations underground consist mainly of:

- Drilling;
- Blasting;
- Crushing;
- Handling and loading of ore;
- Facilities underground include, *inter alia*:
- Materials handling systems;
- Water storage and reticulation systems;
- Engineering and support facilities;
- Fuel storage facilities and re-fueling bays;
- Ventilation systems, and other activities that are typical of underground mining facilities.

There is no extraction of ore via opencast operations at present. Recovery of fines and low-grade ore is also undertaken from surface stockpiles. The thickness of the mined seams in

conjunction with underground crushing ensures that waste rock is not generated and brought to surface. At the surface, the ore is crushed, and separated into various grades which are stockpiled in preparation for transport off the site. Transport is via rail and road.

Surface activities at the Gloria and Nchwaning complexes are comprised of:

- Offices, administration, and support facilities
- Engineering services and facilities
- Underground mining access shafts, vent shafts and related infrastructure;
- Ore Processing Plant;
- Ore (including fines) storage and laydown areas;
- Stacking, reclaiming and loading facilities for transportation of ore;
- Roads, rail, and conveyor systems;
- Current and historical tailings facilities;
- Contractor laydown areas;
- Contractor camps;
- Waste storage and separation facilities;
- Historical and current tailings storage facilities;
- Salvage Yards;



- o Potable water and process water storage and management facilities;
- o Sewage treatment plant;
- o Sub-stations and electrical works;
- o Bulk fuel storage and refueling station;
- o Explosives magazines;
- o Unpaved and paved roads connecting the above and other BRMO operations;
- o Other ancillaries typical of such a mining operation.

Black Rock mine consists mainly of supporting and ancillary services for the active mining and ore processing facilities at the Gloria and Nchwaning mines. These consist of, *inter alia*:

- o Offices, administration and support facilities
- o Engineering services
- o Old Black Rock mine works
- o Old Black Rock Processing Plant
- o Ore laydown areas
- o Black Rock waste management
- o Salvage Yards
- o A landing strip and hangars
- o Top soil stockpiles
- o Potable water and process water storage and management facilities
- o Tailings/Slimes storage facilities
- o A back-up diesel power generation plant

Sub-stations and electrical works

- o Bulk fuel storage and refueling station
- o Explosives magazines
- o Other ancillaries typical of such a mining operation
- o Unpaved and paved roads connecting the above and other BRMO operations.

BRMO also owns residential facilities which are outside of the mining areas. Mining areas are fenced off. Therefore, these residential facilities are separately accessed from public roads and have no interconnecting access to mining areas. These include:

- o Black Rock Village which includes, recreational facilities, and a commercial area;
- o Santoy housing and recreational club;

Facilities located within Black Rock's boundaries which are owned and operated by external parties include:

- o Eskom's Klipkop substation
- o Sedibeng Water's Potable water storage facilities connected to the Vaal Gamagara Water Scheme pipeline.



The historical mine works are not active. The remnants of the works are visible but fenced off.

2.2 Scope of proposed activities

BRMO proposes to expand its mining activities through the establishment of a new Open Cast Mine north of the existing Gloria mine underground complex. The project will include the excavation and establishment of the mining area and required supplementary infrastructure which includes:

- o Site establishment and contractor laydowns area for the construction phase;
- o Clearing of land;
- o Excavation of topsoil, subsoil, overburden, and waste rock, as well as the stockpiling thereof;
- o Blasting, Excavation and extraction of the desired minerals;
- o Primary crushing and screening (mobile and/or stationery) and transported of crushed ore by conveyor to join the Gloria ore stream to the Gloria ore silo and processing plant;
- o Overburden, and product stockpiles within the mining right area;
- o Mechanical conveyance infrastructure (conveyors, loading stations, pipelines, et cetera) and their related civil, and electrical works;
- o Potable water and process water reticulation and storage management facilities;
- o A river diversion (Gamagara River);
- o Storm water management systems;
- o Process water management systems;
- o Haul, access, and maintenance roads;
- o Fencing and access control
- o Waste storage and separation facilities
- o Salvage Yards
- o Sub-stations and electrical works
- o Bulk fuel storage and refuelling station; Explosive magazines

The general preferred location is illustrated in **Figure 3**. It is notable that there is potential for infringement on the Gamagara River and its flood plain, however stockpiles will be located outside of a 100m buffer from the river.

The general preferred location is illustrated in **Figure 3**. It is notable that there is potential for infringement on the Gamagara River and its flood plain, however stockpiles will be located outside of a 100m buffer from the river.

2.2.1 Constructional phase

The construction phase will broadly consist of:

- o Erecting a fences and access control;
- o Removal and relocation of protected plant species;



- o Clearing of remaining vegetation and establishment of roads, contractor laydown areas and project service facilities;
- o Excavation and stockpiling of topsoil;
- o Excavation and stockpiling of subsoil;
- o Excavation and stockpiling of remaining overburden;
- o Site preparation and establishment of civil structures;
- o Equipment installation (primary crushing and screening, conveyors, electrical infrastructure, water management infrastructure, sewage treatment, bulk fueling, etc.)
- o Installation of fines and water conveyance infrastructure (pipelines, pumps et cetera and their related civil, mechanical, and electrical works)

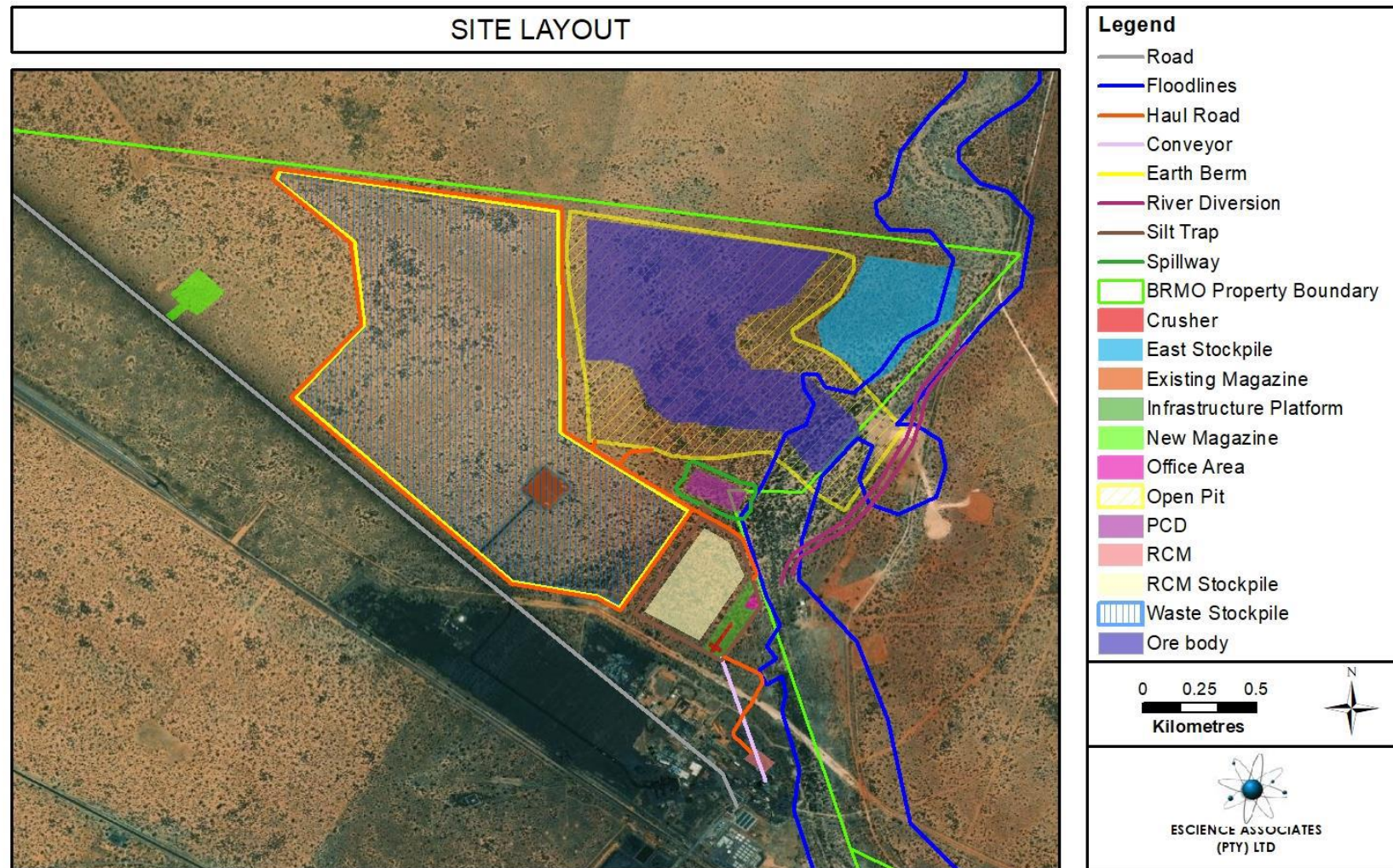


Figure 3: Proposed Activities (Preferred Layout).



2.2.2 Operational phase

The operational phase will consist of:

- o Blasting and excavation of ore;
- o Primary crushing and screening;
- o Conveying and/or hauling of the crushed ore to the existing Gloria facility;
- o Related material handling (loading, unloading, etc.)
- o General maintenance of the facility,

2.2.3 Closure and Decommissioning phase

Three closure scenarios are under consideration:

1. Complete refilling of the pit, with a small overburden stockpile remaining due to material swell.
2. Partial back-filling filling of the pit, with remaining overburden stockpiles.
3. No refill of the pit. Pit will be stabilised and slopes shaped to

The closure and decommissioning phase will broadly consist of:

- o Removal of infrastructure;
- o Refilling of voids;
- o Shaping of filled voids;
- o Ripping and scarifying compacted footprints (e.g. roads and areas previously under stockpiles;
- o Depositing of subsoil and topsoil, rehabilitation and aftercare;
- o Post closure monitoring.

Note that options under consideration for rehabilitation of the pit include:

- o No refilling of the open pit, only shaping and rehabilitation of the sloped faces.
- o Partial Refilling of the pit in the south eastern section;
- o Partial Refilling of the pit;

2.3 ALTERNATIVES CONSIDERED

The EIA regulations require that alternatives be considered. The regulations define “alternatives”, in relation to a proposed activity, means different means of meeting the general purpose and requirements of the activity, which may include alternatives to the -

- (a) property on which or location where the activity is proposed to be undertaken;
- (b) type of activity to be undertaken;
- (c) design or layout of the activity;



- (d) technology to be used in the activity; or
 - (e) operational aspects of the activity;
- and includes the option of not implementing the activity;

A summary of alternatives considered is set out in the ensuing sub-sections.

2.3.1 Locational Alternatives

Optional locations within the Gloria property have been considered for positioning and alignment of the proposed activities. These are illustrated in Figure 2-2.

Notably the location of the open cast pit is dependent on the ore body, and therefore it follows that the location of the pit is pre-determined by the location of feasibly extractable ore.

2.3.2 Type of Activity to be undertaken

- Opencast mining activities will be undertaken. Underground mining has been considered; however, this was found to be unsafe and unfeasible due to the shallow depth to the ore body and the lack of a competent hanging wall.
- In respect of the processing of ore the following alternatives have been considered:
- Primary crushing and screening and subsequent transport of crushed ore to the existing Gloria processing plant. This includes:
 - Belt conveyor to the Gloria plant.
- Haul roads to the Gloria plant.
- Establishment of a primary, secondary, and tertiary crushing and screening and output of final product. This would also include the establishment of related infrastructure such as:
 - Tailings storage facility (TSF).
- Process water reticulation related to transport of fines to a TSF, and return a return water dam and water storage reservoirs.
- Product silos or stockpiles.
- Load-out stations.
- Possible rail infrastructure.

2.3.3 Design or layout

In essence the positioning of the various facets of the proposed development has been considered in different orientations and layouts within the proposed footprint.

In order to minimise footprint, optimise material handling costs, and to optimise ore extraction and transport to the Gloria processing plant, the proposed infrastructure is positioned to exploit existing infrastructure where possible and minimise distances as well, without impinging on the Gamagara River with the exception of the open pit.



2.3.4 *Technology to be used in the activity*

The nature of the proposed activities is relatively established in terms of mining and processing technology. At a macro level the potential of viable technology options is limited by the size and scope of the proposed mine. No technology alternatives have been considered at a scale that would be of environmental significance for the proposed activities.

Impact management technologies considered include:

- Use of water for dust suppression and palliation.
- Use of binder different binder technologies for dust suppression and palliation.

2.3.5 *Operational aspects of the activity*

Various operational alternatives have been considered; these include:

- Blasting schedules and frequency of blasting.
- Operational hours for excavation and materials handling.
- Processing plant operational hours.

2.4 **No-Go Alternative**

The no-go option refers to the alternative of the proposed development not going ahead at all. The baseline status quo would be maintained in this case. The proposed activities will attract significant potential economic benefit, but will also result in potentially significant impacts. It is therefore necessary to consider the no-go alternative on the basis of the findings of the environmental impact assessment when it has been completed.

The proposed open cast mine will support the economic sustainability of Black Rock Mine Operations, and therefore ensure that the significant socio-economic contribution of the mine to the region and the national economy continues.

¹Information provided by EScience

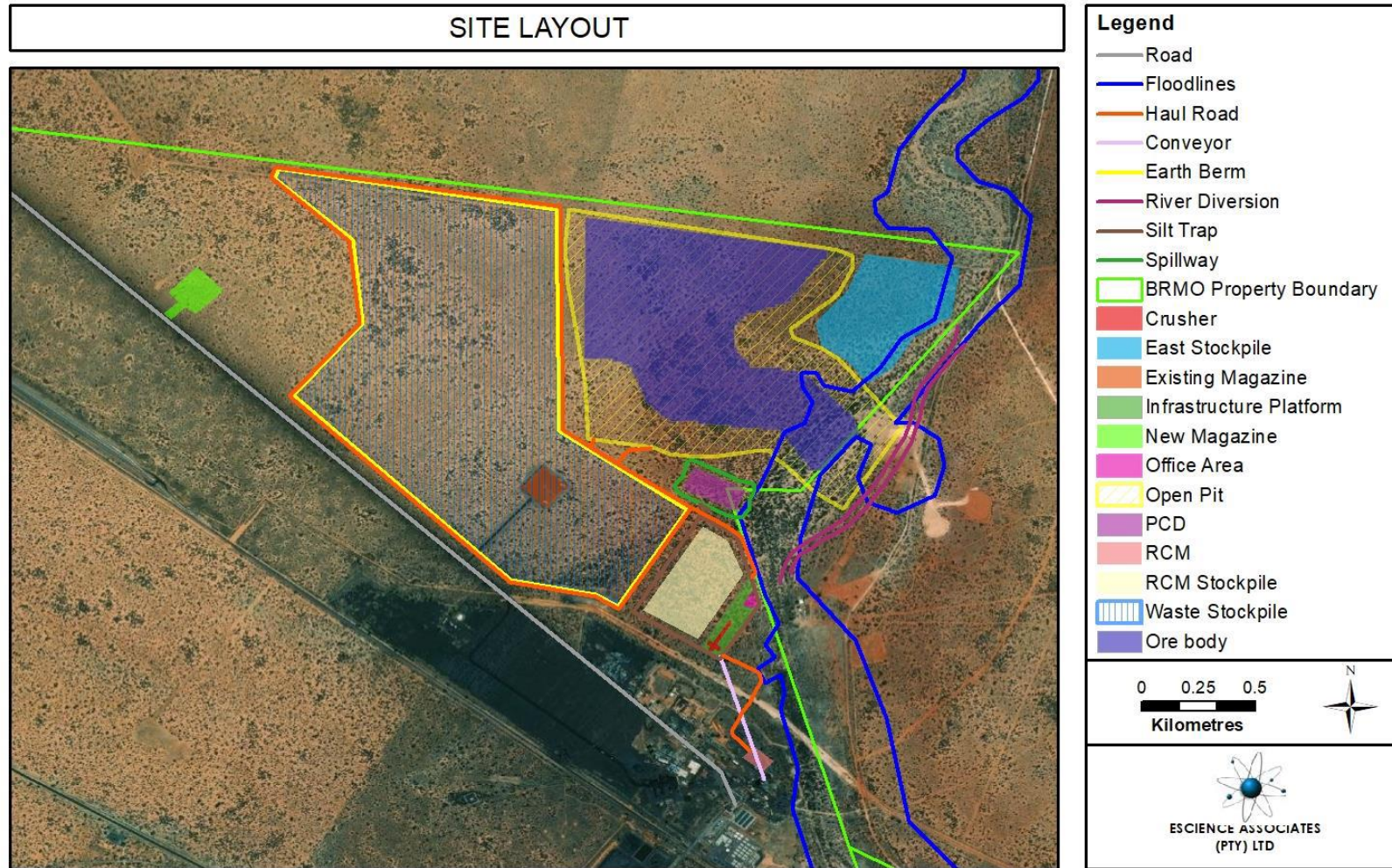


Figure 4: Proposed location.



3 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.

4 LEGISLATION

4.1 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, 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.



5 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.

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

6 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The proposed BLMO Gloria open cast mine in the Northern Cape Province is depicted on the 1: 250 000 Kuruman 2722 (1979) Geological Map (Council of Geosciences, Pretoria) (**Figure 5; Table 9**). The study area is underlain by Cretaceous to Tertiary Kalahari formation (Qs, pale yellow) with underlying Griqualand West Basin rocks of the Transvaal Supergroup (**Figure 6; Table 10-11**).

The Geology has recently been updated (Council of Geosciences, Pretoria) and this map indicates that the proposed development is underlain by the Kalahari Group (**Figure 7**). According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Quaternary sediments is Moderate (**Figure 8**; Almond and Pether, 2009; Almond *et al.*, 2013).

The Quaternary superficial wind-blown sand and calcrete of the Kalahari Group could contain fossils. These superficial deposits are the youngest geological deposits formed during the Quaternary (approximately 2.6 million years ago to present). Most of the superficial deposits are unconsolidated sediments and consist of calcretes, sand, silt and clay, and they form relatively thin, often discontinuous patches of sediments. Quaternary deposits reveal palaeoclimatic changes in the different geological formations (Hunter *et al.*, 2006). The climatic fluctuations in the Cenozoic Era were responsible for the formation of most geomorphologic features in southern Africa (Maud, 2012). Various warming and cooling events occurred in the Cenozoic but climatic changes during the Quaternary, specifically the last 1.8 Ma, were the most drastic climate changes relative to all climate variations in the past Barnosky (2005). Climate in the Quaternary Period were both drier and wetter than the present and resulted in changes in river flow patterns, sedimentation processes and vegetation variation (Tooth *et al.*, 2004).



The fossil assemblages of this Group are generally low in diversity, but locally high and occur over a wide range. Quaternary deposits are especially important when in fluvial environments along water courses. Fossil assemblages include diatoms, gastropod shells, bivalves, ostracods and trace fossils. These fossils represent terrestrial plants and animals with a close resemblance to living forms. Fossil remains include mammalian bones and teeth as well as coprolites, freshwater molluscs and plant microfossils). Fossils in these areas occur over large areas in erosion gullies. Stone artefacts from the earlier part of the Middle Stone Age and the Later Stone Age have also been uncovered and are sometimes associated with bones (Churchill et al. 2000). The palaeontology of the Quaternary superficial deposits has been relatively neglected in the past. Late Cenozoic calcrete may comprise of bones, horn cores as well as mammalian teeth. Tortoise remains have also been uncovered as well as trace fossils which includes termite and insect's burrows and mammalian trackways. Amphibian and crocodile remains have been uncovered where the depositional settings in the past were wetter.

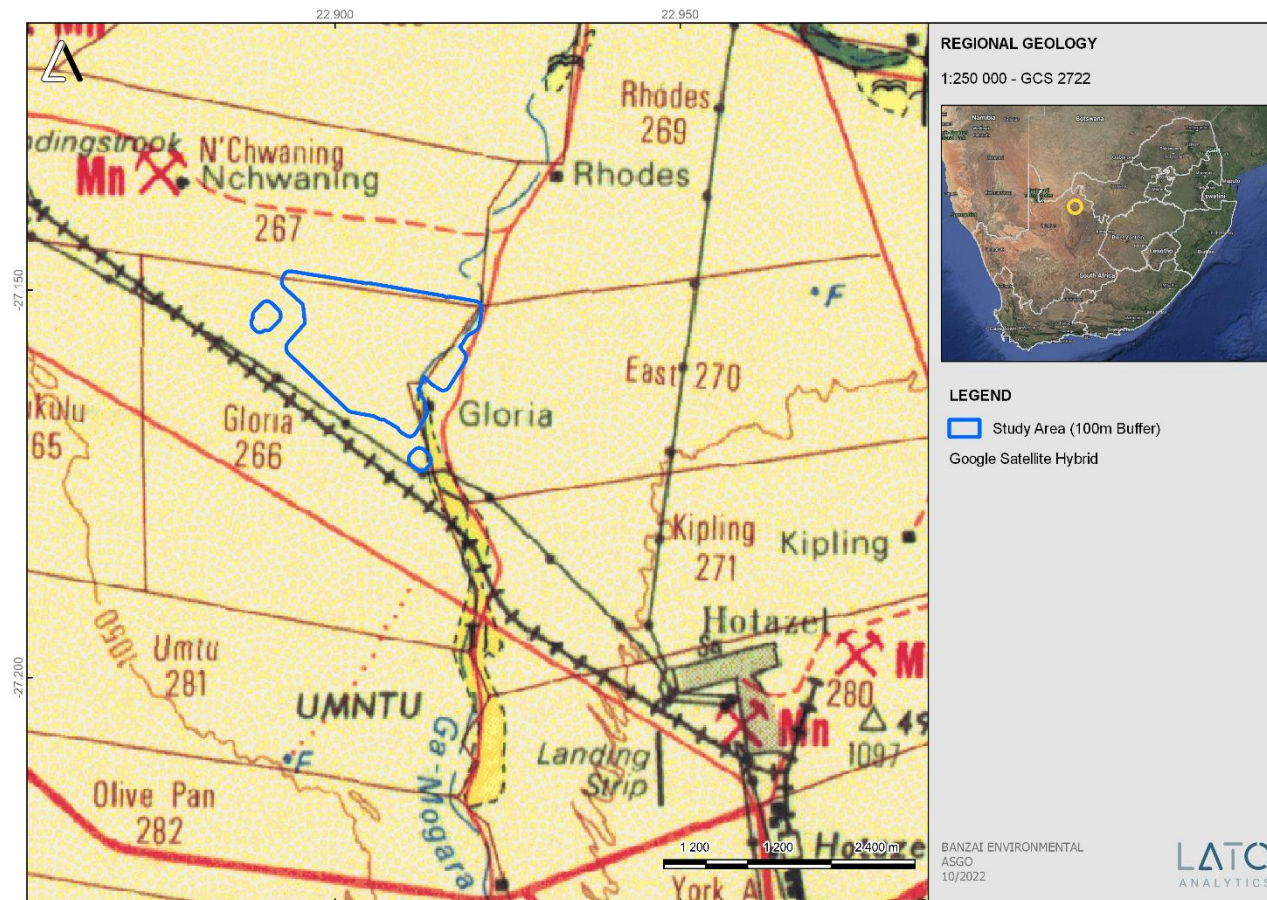


Figure 5: Extract of the 1: 250 000 Kuruman 2722 (1979) Geological Map (Council of Geosciences, Pretoria) indicating the geology of the proposed Gloria open cast mine in the Northern Cape Province.

**Table 9:** Legend (modified) of the 1: 250 000 Kuruman 2722 (1979) Geological Map (Council of Geosciences, Pretoria).

	FORMATION FORMASIE	MEMBER LID	LITHOLOGY LITOLOGIE	
QUATERNARY KWATERNÊR			Red to flesh-coloured wind-blown sand Rooi tot vleeskleurige waaisand	Qs
			Rubble Puin	
			River-terrace gravel Rivierterrasgruis	
TERTIARY TERSIER			Surface limestone Oppervlakkalksteen	Tl

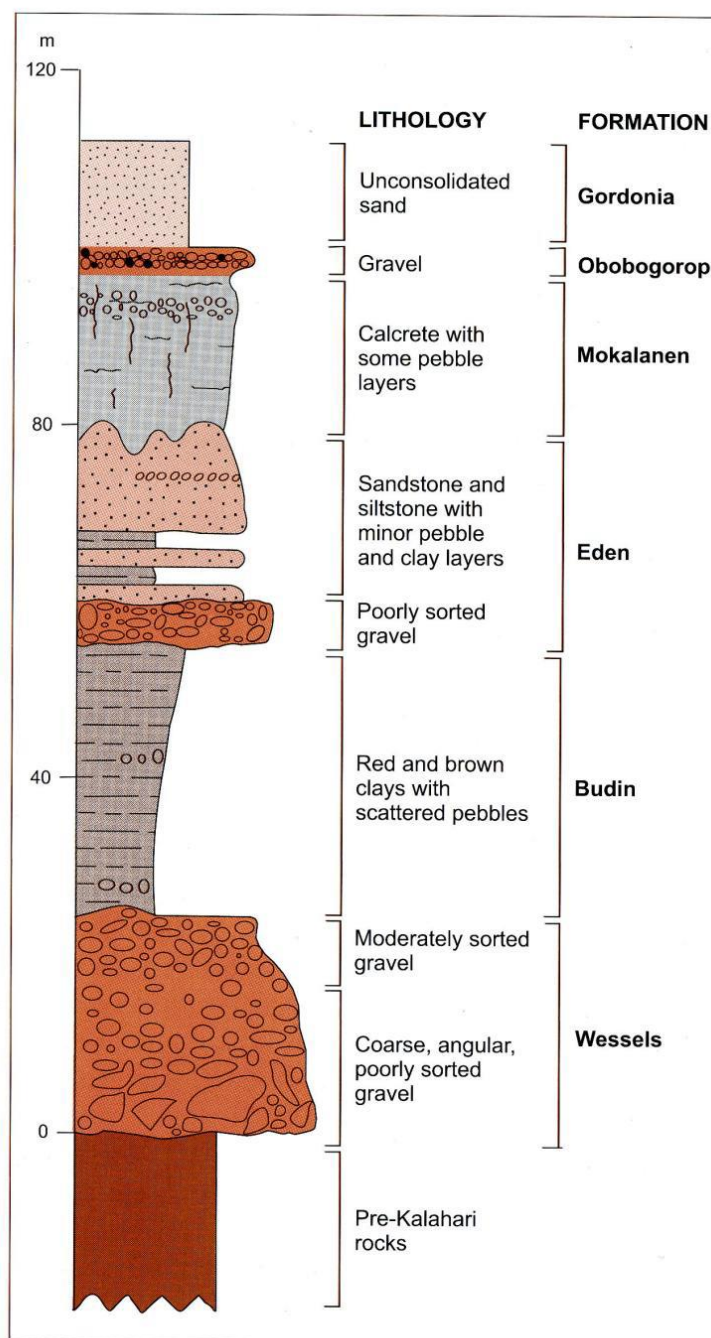


Figure 6: Stratigraphy of the Kalahari Group (Image taken from Partridge et al., 2006). Calcretes and aeolian sands of the Gordonia Formation possibly corresponds to the Mokalanen Formation.



Table 10: Generalised Stratigraphic Column study area					
Stratigraphy			Lithology		
Kalahari Formation (Qs and Q)			Clay, limestone and sand		
Transvaal Supergroup	Postmansburg Group	Voëlwater Subgroup	Hotazel Formation	Iron Formation	
				Upper Mn ore body	
				Middle Mn ore body	
				Iron Formation	
				Lower Mn ore body	
				Mn-rich iron formation	
				Iron Formation	
			Ongeluk Formation	Basaltic lava	

Table 11: Extract of the Palaeotechnical Report (Almond and Pether 2009) indicating possible fossil Heritage of the study area.				
Subgroup/ sequence	Group	Formation	Fossil Heritage	Comment
Tertiary- Quaternary	Kalahari	-	Terrestrial organisms	Trace fossils, ostracods, bivalves, gastropod shells, diatoms
Griqualand West Super Group	Campbell	Ghaapplato (Vgh)	Stromatolites	Cyanobacterial microfossils
-	Griquastad	Asbestos Hills	Stromatolites	Cyanobacterial microfossils

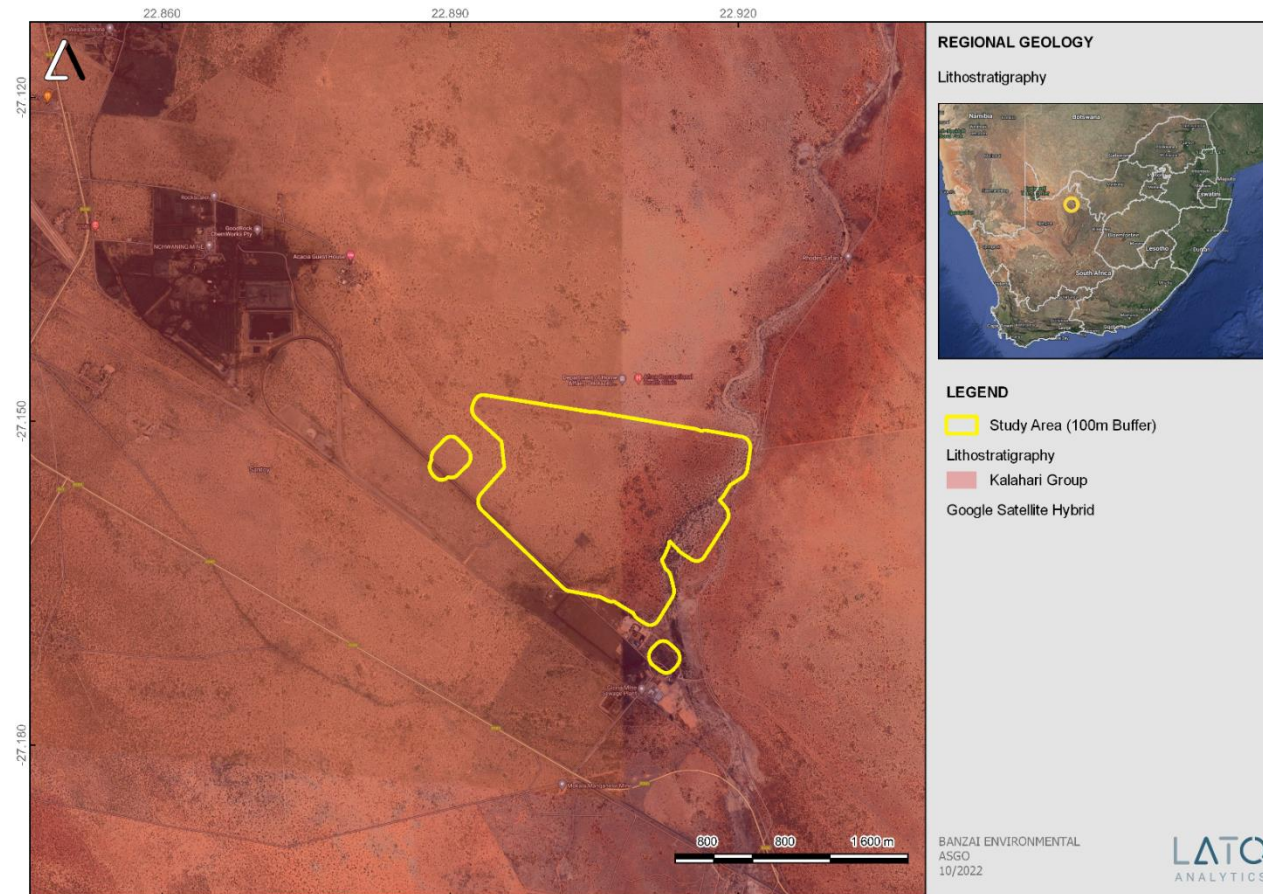


Figure 7: Updated Geology (Council for Geosciences, Pretoria).

According to this map the development is underlain by the Kalahari Group.

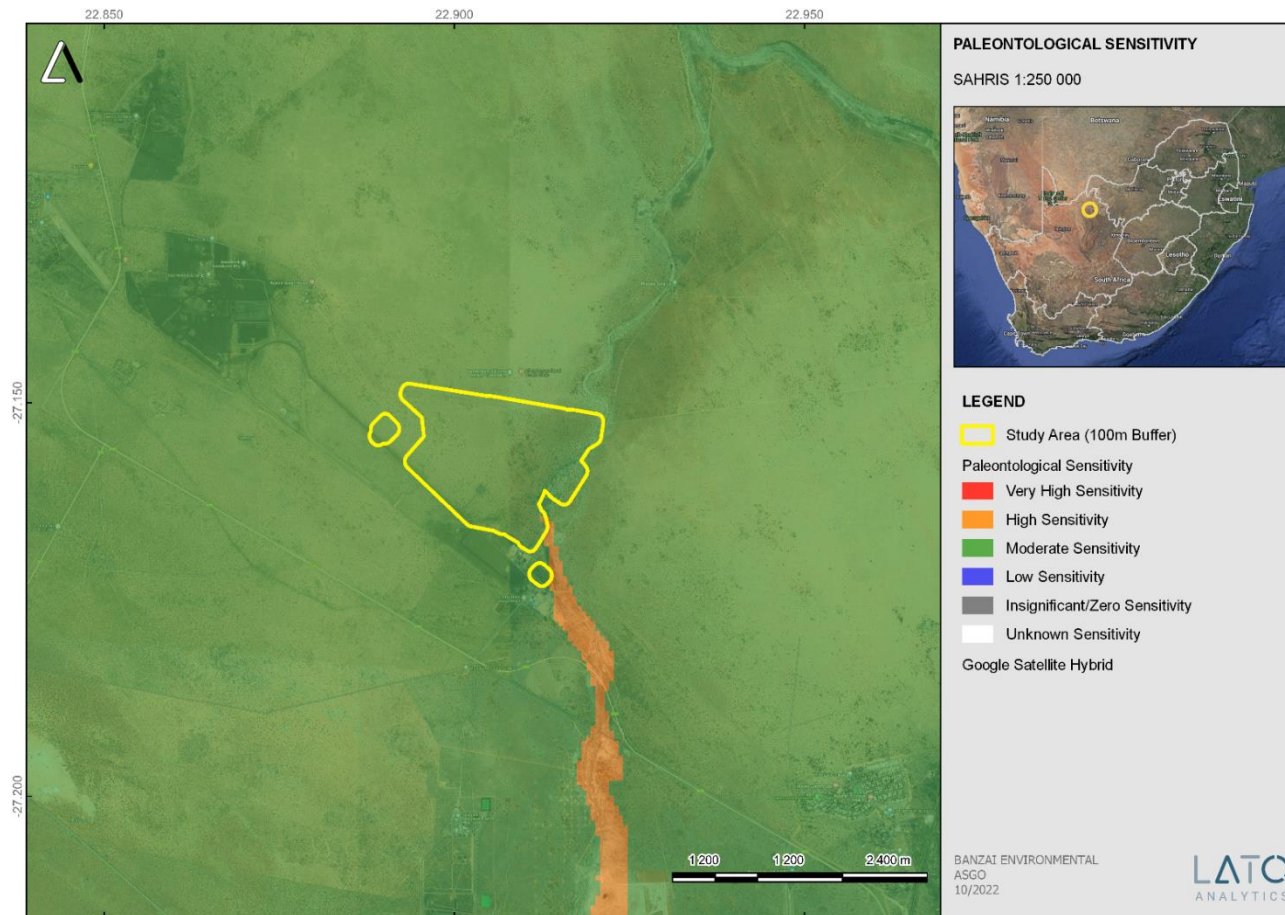


Figure 8 : Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed development in yellow.



According to the SAHRIS Palaeosensitivity map (**Figure 7**) the proposed development is underlain by sediments with a Moderate (green) Palaeontological Sensitivity.

Table 12 : Palaeontological Sensitivity on SAHRIS		
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.

7 GEOGRAPHICAL LOCATION OF THE SITE

BRMO is situated at Santoy in the Northern Cape Province approximately 80 km north-west of the town of Kuruman and 12 kilometers north-west of the town of Hotazel. The proposed site for the open cast mine is located predominantly on the northern extent of Portion 1 of the farm Gloria No. 266 belonging to BRMO. Therefore, the site itself is approximately 6km north-west of Hotazel, and 6 km south-east of Santoy. BRMO falls within the jurisdiction of the John Taolo Gaetsewe District Municipality, and the Joe Morolong Local Municipality¹.

¹Information provided by EScience

8 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. Scientific research articles of research conducted in the area is also sourced and included in the Impact Assessment.

8.1 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.

9 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984).
- 1: 250 000 Kuruman, 2722 (Moen 1979).) Geological Map (Council of Geosciences, Pretoria)
- A Google Earth map with polygons of the proposed development was obtained from ESCIENCE Associates.
- Shape files produced by the Council of Geosciences (Pretoria).

10 IMPACT ASSESSMENT METHODOLOGY

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

- Construction.
- Operation; and
- Decommissioning.

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its significance should



also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact, the following criteria is used:

Table 13: The rating system

NATURE		
The Nature of the Impact is the possible destruction of fossil heritage		
GEOGRAPHICAL EXTENT		
This is defined as the area over which the impact will be experienced.		
1	Site	The impact will only affect the site.
2	Local/district	Will affect the local area or district.
3	Province/region	Will affect the entire province or region.
4	International and National	Will affect the entire country.
PROBABILITY		
This describes the chance of occurrence of an impact.		
1	Unlikely	The chance of the impact occurring is extremely low (Less than a 25% chance of occurrence).
2	Possible	The impact may occur (Between a 25% to 50% chance of occurrence).
3	Probable	The impact will likely occur (Between a 50% to 75% chance of occurrence).
4	Definite	Impact will certainly occur (Greater than a 75% chance of occurrence).
DURATION		
This describes the duration of the impacts. Duration indicates the lifetime of the impact as a result of the proposed activity.		
1	Short term	The impact will either disappear with mitigation or will be mitigated through natural processes in a span shorter than the construction phase (0 – 1 years), or the impact



		will last for the period of a relatively short construction period and a limited recovery time after construction, thereafter it will be entirely negated (0 – 2 years).
2	Medium term	The impact will continue or last for some time after the construction phase but will be mitigated by direct human action or by natural processes thereafter (2 – 10 years).
3	Long term	The impact and its effects will continue or last for the entire operational life of the development, but will be mitigated by direct human action or by natural processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory. Mitigation either by man or natural process will not occur in such a way or such a time span that the impact can be considered indefinite.
INTENSITY/ MAGNITUDE		
Describes the severity of an impact.		
1	Low	Impact affects the quality, use and integrity of the system/component in a way that is barely perceptible.
2	Medium	Impact alters the quality, use and integrity of the system/component but system/component still continues to function in a moderately modified way and maintains general integrity (some impact on integrity).
3	High	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component is severely impaired and may temporarily cease. High costs of rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the system/component and the quality, use, integrity and functionality of the system or component permanently ceases and is irreversibly impaired. Rehabilitation and remediation often impossible. If possible rehabilitation



		and remediation often unfeasible due to extremely high costs of rehabilitation and remediation.
REVERSIBILITY		
This describes the degree to which an impact can be successfully reversed upon completion of the proposed activity.		
1	Completely reversible	The impact is reversible with implementation of minor mitigation measures.
2	Partly reversible	The impact is partly reversible but more intense mitigation measures are required.
3	Barely reversible	The impact is unlikely to be reversed even with intense mitigation measures.
4	Irreversible	The impact is irreversible, and no mitigation measures exist.
IRREPLACEABLE LOSS OF RESOURCES		
This describes the degree to which resources will be irreplaceably lost as a result of a proposed activity.		
1	No loss of resource	The impact will not result in the loss of any resources.
2	Marginal loss of resource	The impact will result in marginal loss of resources.
3	Significant loss of resources	The impact will result in significant loss of resources.
4	Complete loss of resources	The impact is result in a complete loss of all resources.
CUMULATIVE EFFECT		
This describes the cumulative effect of the impacts. A cumulative impact is an effect which in itself may not be significant but may become significant if added to other existing or potential impacts emanating from other similar or diverse activities as a result of the project activity in question.		
1	Negligible cumulative impact	The impact would result in negligible to no cumulative effects.
2	Low cumulative impact	The impact would result in insignificant cumulative effects.
3	Medium cumulative impact	The impact would result in minor cumulative effects.



4	High cumulative impact	The impact would result in significant cumulative effects
SIGNIFICANCE		
<p>Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula:</p> <p>(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity = X.</p> <p>The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.</p>		
Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative effects and will require moderate mitigation measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects and will require significant mitigation measures to achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive effects.
74 to 96	Negative very high impact	The anticipated impact will have highly significant effects and are unlikely to be able to be mitigated adequately. These impacts could be considered "fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant positive



10.1 Summary of Impact Tables

Loss of fossil heritage will be a negative impact. Only the site will be affected by the proposed development. The expected duration of the impact is assessed as potentially permanent to long term. In the absence of mitigation procedures, the damage or destruction of any palaeontological materials will be permanent. Impacts on palaeontological heritage during the construction phase could potentially occur and are regarded as having a high probability. As fossil heritage will be destroyed the impact is irreversible. The significance of the impact occurring will be medium pre-mitigation and low post-mitigation.

Table 14: Summary of Impact Tables

	Site	Probability	Duration	Magnitude	Reversibility	Irreplicable Loss	Cumulative Effect	Significance
	1	2	4	1	4	4	2	17

11 FINDINGS AND RECOMMENDATIONS

The proposed new opencast mine at BRMO, near Hotazel, Northern Cape is completely underlain by the Cenozoic Kalahari Group, as well underlying Griqualand West Basin rocks of the Transvaal Supergroup. According to the PalaeoMap on the South African Heritage Resources Information System (SAHRIS) database, the Palaeontological Sensitivity of the Kalahari Group and that of the Griqualand West Basin rocks is moderate (Almond and Pether, 2009; Almond *et al.*, 2013).

It is therefore considered that the BRMO new opencast mine will not lead to detrimental impacts on the palaeontological resources of the area. Thus, the construction and operation of the new mine may be authorised as the whole extent of the development footprint is not considered sensitive in terms of palaeontological resources.

If Palaeontological Heritage is uncovered during surface clearing and excavations the **Chance find Protocol** attached should be implemented immediately. Fossil discoveries ought to be protected and the ECO/site manager must report to South African Heritage Resources Agency (SAHRA) (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carried out.



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.

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

12 CHANCE FINDS PROTOCOL

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

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

Palaeontological heritage is unique and non-renewable and is protected by the NHRA and are the property of the State. It is thus the responsibility of the State to manage and conserve fossils on behalf of the citizens of South Africa. Palaeontological resources may not be excavated, broken, moved, or destroyed by any development without prior assessment and without a permit from the relevant heritage resources authority as per section 35 of the NHRA.

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

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

It is the responsibility of the Environmental Site Officer (ESO) or site manager of the project to train the workmen and foremen in the procedure to follow when a fossil is accidentally uncovered. In the absence of the ESO, a member of the staff must be appointed to be responsible for the proper implementation of the chance find protocol as not to compromise the conservation of fossil material.



12.1 Chance Find Procedure

- If a chance find is made the person responsible for the find must immediately **stop working** and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately **report** the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS coordinates.
- A preliminary report must be submitted to the Heritage Agency within **24 hours** of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.
- Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.
- The site must be secured to protect it from any further damage. **No attempt** should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- In the event that the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO (site manager). Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.
- Once Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.



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Appendix A

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 and Collection Manager	National Museum, Bloemfontein 1998–currently

TECHNICAL REPORTS

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- Butler, E. 2015.** Palaeontological Impact Assessment of the proposed Ficksburg raw water pipeline. Bloemfontein.
- Butler, E. 2015.** Palaeontological Heritage Impact Assessment report on the establishment of the 65 mw Majuba Solar Photovoltaic facility and associated infrastructure on portion 1, 2 and 6 of the farm Witkoppies 81 HS, Mpumalanga Province. Bloemfontein.
- Butler, E. 2015.** Palaeontological Impact Assessment of the proposed township establishment on the remainder of portion 6 and 7 of the farm Sunnyside 2620, Bloemfontein, Mangaung metropolitan municipality, Free State, Bloemfontein.
- Butler, E. 2015.** Palaeontological Impact Assessment of the proposed Woodhouse 1 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.
- Butler, E. 2015.** Palaeontological Impact Assessment of the proposed Woodhouse 2 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.
- Butler, E. 2015.** Palaeontological Impact Assessment of the proposed Orkney solar energy farm and associated infrastructure on the remaining extent of Portions 7 and 21 of the farm Wolvehuis 114, near Orkney, North West Province. Bloemfontein.
- Butler, E. 2015.** Palaeontological Impact Assessment of the proposed Spectra foods broiler houses and abattoir on the farm Maiden Manor 170 and Ashby Manor 171, Lukhanji Municipality, Queenstown, Eastern Cape Province. Bloemfontein.
- Butler, E. 2016.** Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupoot concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoot, Northern Cape. Prepared for Savannah Environmental. Bloemfontein.
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- Butler, E. 2016.** Palaeontological Impact Assessment of the proposed Senqu Pedestrian Bridges in Ward 5 of Senqu Local Municipality, Eastern Cape Province. Bloemfontein.



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Butler, E. 2016. Palaeontological Impact Assessment of the proposed upgrading of the main road MR450 (R335) from Motherwell to Addo within the Nelson Mandela Bay Municipality and Sunday's River valley Local Municipality, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment construction of the proposed Metals Industrial Cluster and associated infrastructure near Kuruman, Northern Cape Province. Savannah South Africa. Bloemfontein.

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- Butler, E. 2017.** Palaeontological impact assessment of the proposed construction of the Lehae training and fire station, Lenasia, Gauteng Province. Bloemfontein.
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- Butler, E. 2017.** Palaeontological Desktop Assessment of the construction of the proposed Viljoenskroon Munic 132 KV line, Vierfontein substation and related projects. Bloemfontein.
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- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of the new coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of a Photovoltaic Solar Power station near Collett substation, Middelburg, Eastern Cape. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment for the proposed township establishment of 2000 residential sites with supporting amenities on a portion of farm 826 in Botshabelo West, Mangaung Metro, Free State Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed prospecting right project without bulk sampling, in the Koa Valley, Northern Cape Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed Aroams prospecting right project, without bulk sampling, near Aggeneys, Northern Cape Province. Bloemfontein.



- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed Belvior aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.
- Butler, E. 2017.** PIA site visit and report of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of Tina Falls Hydropower and associated power lines near Cumbu, Mthlontlo Local Municipality, Eastern Cape. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed construction of the Mangaung Gariep Water Augmentation Project. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed Belvoir aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed construction of the Melkspruit-Rouxville 132KV Power line. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed development of a railway siding on a Portion of portion 41 of the farm Rustfontein 109 is, Govan Mbeki local municipality, Gert Sibande district municipality, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed consolidation of the proposed Ilima Colliery in the Albert Luthuli local municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed extension of the Kareerand Tailings Storage Facility, associated borrow pits as well as a storm water drainage channel in the Vaal River near Stilfontein, North West Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed construction of a filling station and associated facilities on the Erf 6279, district municipality of John Taolo Gaetsewe District, Ga-Segonyana Local Municipality Northern Cape. Bloemfontein.
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- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed Overvaal Trust PV Facility, Buffelspoort, North West Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed development of the H₂ Energy Power Station and associated infrastructure on Portions 21; 22 And 23 of the farm Hartebeestspuit in the Thembisile Hani Local Municipality, Nkangala District near Kwamhlanga, Mpumalanga Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed upgrade of the Sandriver Canal and Klippan Pump station in Welkom, Free State Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed upgrade of the 132kv and 11kv power line into a dual circuit above ground power line feeding into the Urania substation in Welkom, Free State Province. Bloemfontein.



- Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.
- Butler, E. 2017.** Palaeontological Impact Assessment of the proposed diamonds alluvial & diamonds general prospecting right application near Christiana on the remaining extent of portion 1 of the farm Kaffraria 314, registration division HO, North West Province. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Hartebeesfontein, near Panbult, Mpumalanga. Bloemfontein.
- Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Rustplaas near Piet Retief, Mpumalanga. Bloemfontein.
- Butler, E. 2018.** Palaeontological Impact Assessment for the Proposed Landfill Site in Luckhoff, Letsemeng Local Municipality, Xhariep District, Free State. Bloemfontein.
- Butler, E. 2018.** Palaeontological Impact Assessment of the proposed development of the new Mutsho coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.
- Butler, E. 2018.** Palaeontological Impact Assessment of the authorisation and amendment processes for Manangu mine near Delmas, Victor Khanye local municipality, Mpumalanga. Bloemfontein.
- Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed Mashishing township establishment in Mashishing (Lydenburg), Mpumalanga Province. Bloemfontein.
- Butler, E. 2018.** Palaeontological Desktop Assessment for the Proposed Mlonzi Estate Development near Lusikisiki, Ngquza Hill Local Municipality, Eastern Cape. Bloemfontein.
- Butler, E. 2018.** Palaeontological Phase 1 Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.
- Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed electricity expansion project and Sekgame Switching Station at the Sishen Mine, Northern Cape Province. Bloemfontein.
- Butler, E. 2018.** Palaeontological field assessment of the proposed construction of the Zonnebloem Switching Station (132/22kV) and two loop-in loop-out power lines (132kV) in the Mpumalanga Province. Bloemfontein.
- Butler, E. 2018.** Palaeontological Field Assessment for the proposed re-alignment and de-commissioning of the Firham-Platrand 88kv Powerline, near Standerton, Lekwa Local Municipality, Mpumalanga province. Bloemfontein.
- Butler, E. 2018.** Palaeontological Desktop Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.
- Butler, E. 2018.** Palaeontological field Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.
- Butler, E. 2018.** Palaeontological desktop assessment of the proposed Mookodi – Mahikeng 400kV line, North West Province. Bloemfontein.
- Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed Thornhill Housing Project, Ndlambe Municipality, Port Alfred, Eastern Cape Province. Bloemfontein.
- Butler, E. 2018.** Palaeontological desktop assessment of the proposed housing development on portion 237 of farm Hartebeestpoort 328. Bloemfontein.



Butler, E. 2018. Palaeontological desktop assessment of the proposed New Age Chicken layer facility located on holding 75 Endicott near Springs in Gauteng. Bloemfontein.

Butler, E. 2018 Palaeontological Desktop Assessment for the development of the proposed Leslie 1 Mining Project near Leandra, Mpumalanga Province. Bloemfontein.

Butler, E. 2018. Palaeontological field assessment of the proposed development of the Wildealskloof mixed use development near Bloemfontein, Free State Province. Bloemfontein.

Butler, E. 2018. Palaeontological Field Assessment of the proposed Megamor Extension, East London. Bloemfontein

Butler, E. 2018. Palaeontological Impact Assessment of the proposed diamonds Alluvial & Diamonds General Prospecting Right Application near Christiana on the Remaining Extent of Portion 1 of the Farm Kaffraria 314, Registration Division HO, North West Province. Bloemfontein.

Butler, E. 2018. Palaeontological Impact Assessment of the proposed construction of a new 11kV (1.3km) Power Line to supply electricity to a cell tower on farm 215 near Delportshoop in the Northern Cape. Bloemfontein.

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Butler, E. 2018. Palaeontological Exemption Letter for the proposed reclamation and reprocessing of the City Deep Dumps in Johannesburg, Gauteng Province. Bloemfontein.

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Butler, E. 2018. Proposed Kalabasfontein Mine Extension project, near Bethal, Govan Mbeki District Municipality, Mpumalanga. Bloemfontein.

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- Butler, E., 2019.** Palaeontological Field Assessment for the Moeding Solar Grid Connection, North West Province.
- Butler, E., 2019.** Recommended Exemption from further Palaeontological studies for the Proposed Agricultural Development on Farms 1763, 2372 And 2363, Kakamas South Settlement, Kai! Garib Municipality, Mgcawu District Municipality, Northern Cape Province.
- Butler, E., 2019.** Recommended Exemption from further Palaeontological studies: of Proposed Agricultural Development, Plot 1178, Kakamas South Settlement, Kai! Garib Municipality
- Butler, E., 2019.** Palaeontological Desktop Assessment for the Proposed Waste Rock Dump Project at Tshipi Borwa Mine, near Hotazel, Northern Cape Province:
- Butler, E., 2019.** Palaeontological Exemption Letter for the proposed DMS Upgrade Project at the Sishen Mine, Gamagara Local Municipality, Northern Cape Province
- Butler, E., 2019.** Palaeontological Desktop Assessment of the proposed Integrated Environmental Authorisation process for the proposed Der Brochen Amendment project, near Groblershoop, Limpopo
- Butler, E., 2019.** Palaeontological Desktop Assessment of the proposed updated Environmental Management Programme (EMPr) for the Assmang (Pty) Ltd Black Rock Mining Operations, Hotazel, Northern Cape
- Butler, E., 2019.** Palaeontological Desktop Assessment of the proposed Kriel Power Station Lime Plant Upgrade, Mpumalanga Province
- Butler, E., 2019.** Palaeontological Impact Assessment for the proposed Kangala Extension Project Near Delmas, Mpumalanga Province.
- Butler, E., 2019.** Palaeontological Desktop Assessment for the proposed construction of an iron/steel smelter at the Botshabelo Industrial area within the Mangaung Metropolitan Municipality, Free State Province.
- Butler, E., 2019.** Recommended Exemption from further Palaeontological studies for the proposed agricultural development on farms 1763, 2372 and 2363, Kakamas South settlement, Kai! Garib Municipality, Mgcawu District Municipality, Northern Cape Province.
- Butler, E., 2019.** Recommended Exemption from further Palaeontological Studies for Proposed formalisation of Gamakor and Noodkamp low-cost Housing Development, Keimoes, Gordonia Rd, Kai !Garib Local Municipality, ZF Mgcawu District Municipality, Northern Cape Province.
- Butler, E., 2019.** Recommended Exemption from further Palaeontological Studies for proposed formalisation of Blaauwskop Low-Cost Housing Development, Kenhardt Road, Kai !Garib Local Municipality, ZF Mgcawu District Municipality, Northern Cape Province.
- Butler, E., 2019.** Palaeontological Desktop Assessment of the proposed mining permit application for the removal of diamonds alluvial and diamonds kimberlite near Windsorton on a certain portion of Farm Zoelen's Laagte 158, Registration Division: Barkly Wes, Northern Cape Province.
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- Butler, E., 2019.** Palaeontological Desktop Assessment for The Proposed 920 KWP Groenheuwel Solar Plant Near Augrabies, Northern Cape Province
- Butler, E., 2019.** Palaeontological Desktop Assessment for the establishment of a Super Fines Storage Facility at Amandelbult Mine, Near Thabazimbi, Limpopo Province
- Butler, E., 2019.** Palaeontological Impact Assessment for the proposed Sace Lifex Project, Near Emalahleni, Mpumalanga Province
- Butler, E., 2019.** Palaeontological Desktop Assessment for the proposed Rehau Fort Jackson Warehouse Extension, East London
- Butler, E., 2019.** Palaeontological Desktop Assessment for the proposed Environmental Authorisation Amendment for moving 3 Km of the Merensky-Kameni 132KV Powerline
- Butler, E., 2019.** Palaeontological Impact Assessment for the proposed Umsobomvu Solar PV Energy Facilities, Northern and Eastern Cape
- Butler, E., 2019.** Palaeontological Desktop Assessment for six proposed Black Mountain Mining Prospecting Right Applications, without Bulk Sampling, in the Northern Cape.
- Butler, E., 2019.** Palaeontological field Assessment of the Filling Station (Rietvlei Extension 6) on the Remaining Portion of Portion 1 of the Farm Witkoppies 393JR east of the Rietvleidam Nature Reserve, City of Tshwane, Gauteng
- Butler, E., 2019.** Palaeontological Desktop Assessment of The Proposed Upgrade of The Vaal Gamagara Regional Water Supply Scheme: Phase 2 And Groundwater Abstraction
- Butler, E., 2019.** Palaeontological Desktop Assessment of The Expansion of The Jan Kempdorp Cemetery on Portion 43 Of Farm Guldenskat 36-Hn, Northern Cape Province
- Butler, E., 2019.** Palaeontological Desktop Assessment of the Proposed Residential Development on Portion 42 Of Farm Geldunskat No 36 In Jan Kempdorp, Phokwane Local Municipality, Northern Cape Province
- Butler, E., 2019.** Palaeontological Impact Assessment of the proposed new Township Development, Lethabo Park, on Remainder of Farm Roodepan No 70, Erf 17725 And Erf 15089, Roodepan Kimberley, Sol Plaatjies Local Municipality, Frances Baard District Municipality, Northern Cape
- Butler, E., 2019.** Palaeontological Protocol for Finds for the proposed 16m WH Battery Storage System in Steinkopf, Northern Cape Province
- Butler, E., 2019.** Palaeontological Exemption Letter of the proposed 4.5WH Battery Storage System near Midway-Pofadder, Northern Cape Province
- Butler, E., 2019.** Palaeontological Exemption Letter of the proposed 2.5ml Process Water Reservoir at Gloria Mine, Black Rock, Hotazel, Northern Cape
- Butler, E., 2019.** Palaeontological Desktop Assessment for the Establishment of a Super Fines Storage Facility at Gloria Mine, Black Rock Mine Operations, Hotazel, Northern Cape:
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Portion of the Remaining Extent of Portion 9 (Wouter), Portion 11 (De Hoek), Portion 14 (Stofdraai) (Portion of Portion 4), the Remaining Extent of Portion 16 (Portion Of Portion 9) (Wouter) and the Remaining Extent of Portion 18 (Portion of Portion 10) of the Farm Lanyon Vale 376, Registration Division: Hay, Northern Cape. Banzai Environmental (Pty) Ltd, Bloemfontein.

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