



PALAEONTOLOGICAL DESKTOP ASSESSMENT

OLIFANTS MANAGEMENT MODEL
PROGRAMME BULK RAW WATER
STUDY PHASE (OMMP-BRWSP) –
SEKURUWE WATER TREATMENT
WORKS NEAR SEKURUWE, IN THE
LIMPOPO PROVINCE

COMPILED FOR PGS HERITAGE



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.

PALAEONTOLOGICAL CONSULTANT:

Banzai Environmental (Pty) Ltd

CONTACT PERSON:

Elize Butler

Tel: +27 844478759

Email: elizebutler002@gmail.com

SIGNATURE:



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 conformance with Appendix 6 of the EIA Regulations of 2014 (as amended)

Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
1.(1) (a) (i) Details of the specialist who prepared the report	Page ii and Section 2 of Report – Contact details and company and Appendix B	-
(ii) The expertise of that person to compile a specialist report including a curriculum vita	Section 2 – refer to Appendix B	-
(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 4 – Methods and TOR	-
(cA) An indication of the quality and age of base data used for the specialist report	Section 5 – Geological and Palaeontological history	-



Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
(cB) a description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change;	Section 7	-
(d) The duration, date and season of the site investigation and the relevance of the season to the outcome of the assessment		Desktop Assessment
(e) a description of the methodology adopted in preparing the report or carrying out the specialised process inclusive of equipment and modelling used	Section 4- Approach and Methodology	-
(f) details of an assessment of the specifically 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 & 8	
(g) An identification of any areas to be avoided, including buffers	Section 1 & 8	
(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 5 – Geological and Palaeontological history	
(i) A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 4.1 – Assumptions and Limitation	-
(j) A description of the findings and potential implications of such findings on the impact of the	Section 1 and 8	



Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
proposed activity, including identified alternatives, on the environment		
(k) Any mitigation measures for inclusion in the EMPr	Section 1 and 8	
(l) Any conditions for inclusion in the environmental authorisation	Section 1 and 8	
(m) Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 1 and 8	
(n)(i) A reasoned opinion as to whether the proposed activity, activities or portions thereof should be authorised and	Section 1 and 8	
(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 8	-
(o) A description of any consultation process that was undertaken during the course of carrying out the study	N/A	Not applicable. A public consultation process was handled as part of the Environmental Impact



Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	The relevant section in the report	Comment where not applicable.
		Assessment (EIA) and Environmental Management Plan (EMP) process.
(p) A summary and copies of any comments that were received during any consultation process	N/A	Not applicable. To date, no comments regarding heritage resources that require input from a specialist have been raised.
(q) Any other information requested by the competent authority.	N/A	Not applicable.
(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 3-compliance with SAHRA guidelines	



EXECUTIVE SUMMARY

Banzai Environmental was commissioned to conduct the Palaeontological Desktop Assessment (PDA) for the proposed Sekuruwe Water Treatment Works near Sekuruwe, in the Limpopo Province. This PDA is required to confirm whether fossil material may potentially be present in the planned development area and to assess the potential impact of the proposed development on the local palaeontological heritage in order to comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA).

The proposed development is underlain by the Goudplaats Gneiss Suite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Goudplaats-River Gneiss Suite has a Palaeontological Sensitivity of Zero. The geology has been updated (Council of Geosciences, Pretoria) and confirms that the Goudplaats-River Gneiss Suite underpins the research region.

A Low Palaeontological Significance has been allocated to the development footprint. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

However, 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 be informed. These discoveries ought to be protected and the ECO 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 paleontologist.

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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LIST OF ABBREVIATIONS

BA	Basic Assessment
DEA	Department of Environmental Affairs
DFFE	Department of Forestry, Fisheries and the Environment
DWS	Department of Water and Sanitation
CA	National Competent Authority
ECO	Environmental Control Officer
EMPr	Environmental Management Programme
ESO	Environmental Site Officer
HIA	Heritage Impact Assessment
Ma	Millions of years ago
MLM	Mogalakwena Local Municipality
NEMA	National Environmental Management Act
NHRA	National Heritage Resources Act
ORWRDP	Olifants River Water Resources Development Project
OMMP – BRWSP	Olifants Management Model Programme Bulk Raw Water Study Phase
PIA	Palaeontological Impact Assessment
PSSA	Palaeontological Society of South Africa
Record of Decision	rRoD
SAHRA	South African Heritage Resources Agency
SAHRIS	South African Heritage Resources Information System
S&EIA	Scoping & Environmental Impact Assessment
ToR	Terms of Reference
WSDP	Water Services Development Plan
WSA	Water Services Authority
WTW	Water Treatment Works
ZNJV	Zutari Ndodana Joint Venture



1 INTRODUCTION

SEKURUWE WATER TREATMENT WORKS

Zutari Ndodana Joint Venture (ZNJV)¹ was previously appointed by the Trans-Caledon Tunnel Authority (TCTA), on behalf of the Department of Water and Sanitation (DWS) for the provision of professional services for the Olifants River Water Resources Development Project – Phase 2 (ORWRDP-2). Initially the Project comprised of the following phases:

- ▶ Phase 2A: Construction of De Hoop Dam
- ▶ Phase 2B: Pipeline from Flag Boshielo Dam to Pruissen near Sekuruwe (72km)
- ▶ Phase 2B+: New pipe for 2B extension, where existing raw water pipeline to Sekuruwe commences
- ▶ Phase 2C: Pipeline from De Hoop Dam to Mooihoek
- ▶ Phase 2D: Pipeline from Steelpoort to Mooihoek (24km)
- ▶ Phase 2E: Pipeline from Mooihoek to Havercroft Junction (14km)
- ▶ Phase 2F: Pipeline from Havercroft Junction to Olifantspoort (44km)
- ▶ Phase 2G: Possible second pipeline parallel to Phase 2B
- ▶ Phase 2H: Changes and additions to the current Phase 2H (Lebalelo Network); and
- ▶ Phase 2I: Pipeline from the De Hoop Dam to the proposed Eskom Tubatse Pump-storage Hydro-electric Scheme (this Phase has been cancelled).

The ORWRDP-2 has since been reconstituted to become the Olifants Management Model Programme Bulk Raw Water Study Phase (OMMP – BRWSP) in recent years, with the Lebalelo Water User Association (LWUA) acting as the implementing agent for the following portions of the project:

- ▶ Phase 2B
- ▶ Phase 2B+; and
- ▶ Phase 2F

LWUA, has appointed the ZNJV for the provision of professional services for the OMMP-BRWSP. The OMMP-BRWSP bulk infrastructure plan makes provision for the construction of raw water pipeline systems to the identified target areas. These bulk pipeline systems are now identified by their respective “Phase” number. The relevant bulk pipe that would augment raw water to the Mogalakwena system (i.e., for domestic and mine use) is the proposed Phase 2B pipeline. Phase 2B has been authorised by a revised Record of Decision (rRoD) (Ref: **12/12/20/553**) issued in 2006 in terms of the Environmental Conservation Act, (No. 73 of 1989) (ECA). The proposed Water Treatment Works (WTW) are located in

¹ Previously referred to as Aurecon
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Reg No. 2015/332235/07 |



two locations along the alignment of Phase 2B+. This phase is an extension of Phase 2B and spans from Pruisen reservoir to Piet-se-Kop. The gravity pipeline has been authorised by EA (12/1/9/1-W120) and EA (12/19/1-W131). The OMMP-BRWSP bulk infrastructure plan makes provision for the construction of raw water pipeline systems to the identified target areas.

The Mogalakwena Local Municipality (MLM) is a Water Services Authority (WSA) as contemplated in the Water Services Act (Act 108 of 1997). Therefore, the municipality is responsible for the realisation of the right to access to basic water services: ensuring progressive realisation of the right to basic water services, subject to available resources (that is, extension of services), the provision of effective and efficient ongoing services (performance management, by laws) and sustainability (financial planning, tariffs, service level choices, environmental monitoring). The WSA has developed a Water Services Development Plan (WSDP) in conjunction with master plans for water and sanitation.

The planning for water and wastewater services in Mogalakwena culminated in the Mogalakwena Water Master Plan (MWMP). As part of the MWMP, two new WTW are to be provided, namely a works serving the Sekuruwe Town with an ultimate capacity of 28ML/d and another servicing the areas north of Sekuruwe located near Sekuruwe Township with an ultimate design capacity of 21ML/d.

The technical features of the scheme proposed in the MWMP (for the ultimate scheme) include the following:

- ▶ A raw water pipe from the farm Pruisen (where it connects to the bulk water pipeline from Flag Boshielo Dam) to new a WTW. TATER his works will supply potable water to Sekuruwe Central Business District (CBD) and town areas.
- ▶ The raw water pipe will continue from the WTW at Sekuruwe, northwards to the rural town area of Sekuruwe. At this point a second WTW will be constructed. This WTW will be able to provide potable water to mining clients and residents for various rural villages.
- ▶ Mining water users will also be able to draw water from the raw water line at various points towards Sekuruwe. This will be handled by means of offtake agreements.

This Basic Assessment Report (BAR) has been compiled for the Sekuruwe WTW situated along the Phase 2B+ pipeline alignment. LWUA is proposing to construct the Sekuruwe WTW and associated infrastructure located north of the town of Sekuruwe near the Mogalakwena Platinum Mine, in the Mogalakwena Local Municipality. The overall objective of the proposed development is to supply potable water for commercial and residential purposes.

The above-mentioned information was provided by ZNJV.

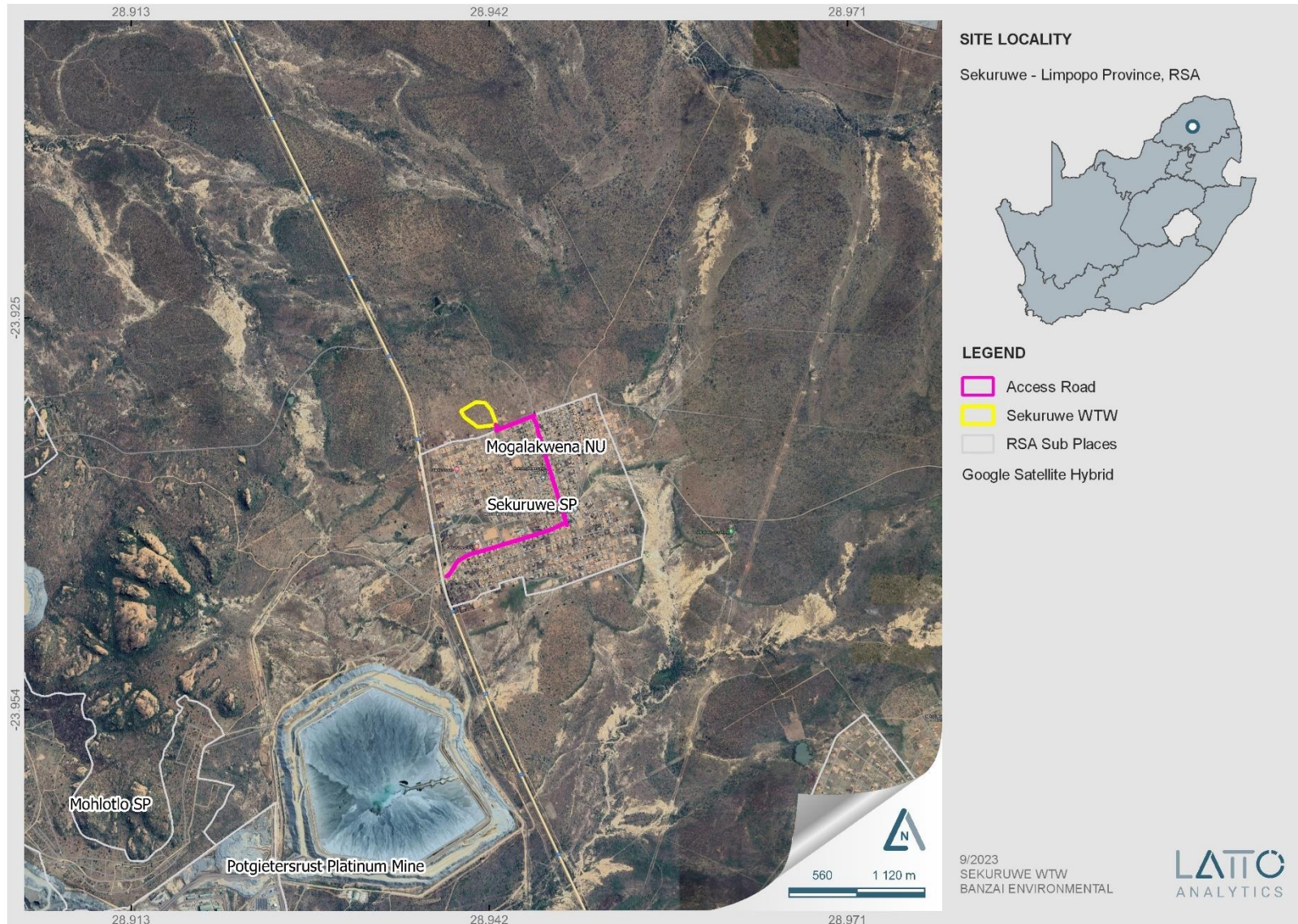


Figure 1: Regional Locality of the proposed Sekuruwe Water Treatment Works.

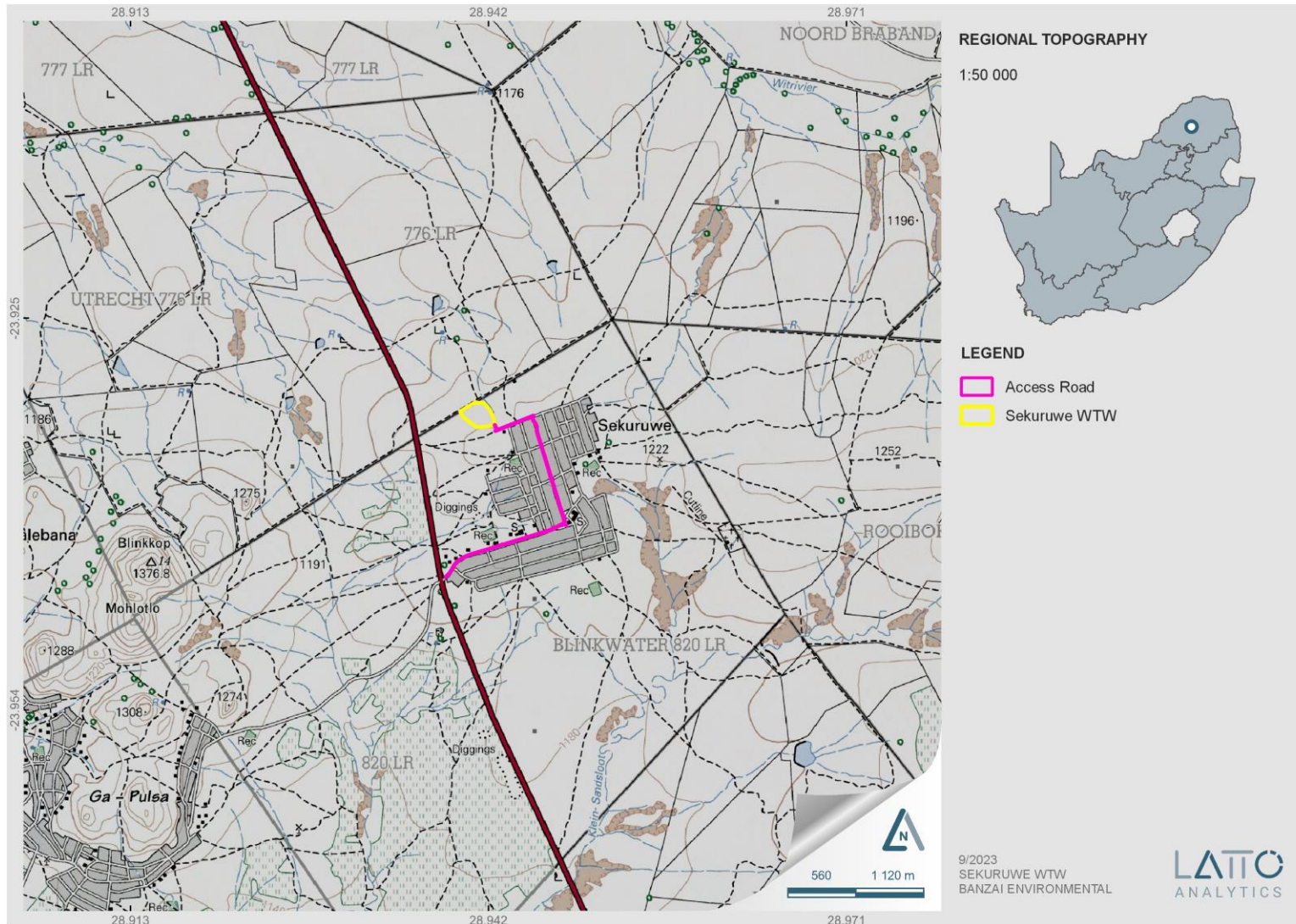


Figure 2: Regional topography of the study area.



2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

Mrs. Elize Butler conducted the current study. For developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga, she has completed almost 300 palaeontological impact assessments. She has an MSc (*cum laude*) in Zoology with a focus in Palaeontology from the University of the Free State in South Africa, and she has more than 30 years of experience in the field. She has knowledge of finding, collecting, and curating fossils. She began conducting PIAs in 2014 and has been a member of the Palaeontological Society of South Africa (PSSA) since 2006.

3 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 No. 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 No. 107 of 1998
- National Heritage Resources Act (NHRA) Act No. 25 of 1999
- Minerals and Petroleum Resources Development Act (MPRDA) Act No. 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 No. 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 No. 25 of 1999

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

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 a comprehensive and legally compatible PIA report has 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; or
 - 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.

Although minimum standards for archaeological (2007) and palaeontological (2012) assessments were published by SAHRA, GN.648 requires sensitivity verification for a site selected on the national web-based environmental screening tool for which no specific assessment protocol related to any theme has been identified. The requirements for this Government Notice (GN) are listed in Table below and the applicable section in this report is noted.

Reporting requirements for GN648

GN 648	Relevant section in report	Where not applicable in this report
2.2 (a) a desktop analysis using satellite imagery;	Section 5	
2.2 (b) a preliminary on-site inspection to identify if there are any discrepancies with the current use of land and environmental status quo versus the environmental	Desktop assessment	-



GN 648	Relevant section in report	Where not applicable in this report
sensitivity as identified on the national web-based environmental screening tool, such as new developments, infrastructure, indigenous/pristine vegetation, etc.		
2.3(a) confirms or disputes the current use of the land and environmental sensitivity as identified by the national web-based environmental screening tool;	Section 5	-
2.3(b) contains motivation and evidence (e.g. photographs) of either the verified or different use of the land and environmental sensitivity;	Section 5	-

4 METHODS AND TERMS OF REFERENCE

This PDA assesses the development's potential impact on the fossil heritage. This Palaeontological Assessment is part of the HIA Report. The PIA's goals are to: 1) identify the palaeontological significance of the rock formations in the footprint; 2) evaluate the palaeontological magnitude of the formations; 3) clarify the impact on fossil heritage; and 4) make recommendations for how the developer might protect and minimize potential harm to fossil heritage, according to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports".

Calculations of the palaeontological state of each rock segment and the potential impact of development on fossil history take into account the palaeontological status of the rocks, the type of development, and the amount of bedrock removed.

The Provisional DFFE Screening Tool, the SAHRIS Palaeosensitivity map, all Palaeontological Impact Assessment reports for the same area, Google Earth images, topographical and geological maps, as well as academic articles about specimens from the development area and Assemblage Zones, are all used to create scoping reports.

When the development footprint has a moderate to high palaeontological sensitivity, a field-based assessment is necessary. A desktop or field assessment of the exposed rock is used to evaluate the significance of the proposed development's impact, and recommendations for more research or mitigation are made. Excavations for the project often only take place during the building phase, changing the terrain and destroying or permanently encasing fossils at or below the ground surface. Then, access to Fossil Heritage will no longer be available for academic study.



When doing a site investigation, a palaeontologist examines the local development as well as the quantity and variety of fossils found there. This can be demonstrated by looking at representative fossiliferous rock exposures (most igneous and metamorphic rocks are not fossiliferous, whereas sedimentary rocks contain fossil heritage). Examined rock exposures frequently contain a sizeable portion of the stratigraphic unit, which is primarily made up of recently exposed (unweathered) rock. These exposures may be man-made (such as quarries, open building excavations, even railway and road cuttings) or natural (such as cliffs, and dongas as well as rocky outcrops along stream or river banks). It is usual practice for palaeontologists to record well-preserved fossils (GPS, and stratigraphic data) during field assessment examinations.

Although mitigation is often done prior to construction, it may take place if potentially fossiliferous bedrock is revealed. Fossil collection and documentation are examples of mitigation. A permit from SAHRA must be obtained before beginning any fossil excavation, and the material must be stored at an authorized facility. When mitigation is properly used, it is possible to have a positive impact by raising awareness of the palaeontological past of the area.

By physically evaluating bedrock outcrops to determine their lithology and fossil richness and crisscrossing the development footprint, one can assess an area's fossil potential. Because the presence of fossils at the surface is so unexpected, an average sample size of the region is investigated. To be clear, however, the lack of fossils in a development footprint does not automatically suggest that there is no palaeontologically important material present on the site (on or below the ground surface).

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;
- Describe of the proposed project and provide information regarding the developer and consultant who commissioned the study;
- Describe location of the proposed development and provide geological and topographical maps
- Provide palaeontological and geological history of the affected area;
- Identify sensitive areas to be avoided (providing shapefiles/kmls) in the proposed development;
- Evaluate 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** are impacts that 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
 - Detail the implications of specialist findings for the proposed development (such as permits, licenses etc).

4.1 Assumptions and Limitations

The geology of the area is the focal point of geological maps, and the sheet explanations of the Geological Maps were not intended to focus on palaeontological heritage. Many inaccessible areas of South Africa have never been examined by palaeontologists, and data is typically dependent solely on aerial pictures. Locality and geological information in museums and university databases is out of date, and data acquired in the past is not always adequately documented.

Comparable Assemblage Zones in other places are also used to provide information on the existence of fossils in areas that have not before been recorded. When similar Assemblage Zones and geological formations are used for Desktop studies, it is commonly assumed that exposed fossil exists within the footprint. As a result, a field assessment will improve the accuracy of the desktop evaluation.

5 GEOLOGICAL AND PALAEOONTOLOGICAL HISTORY

The geology of the proposed Sekuruwe Water Treatment Works near Sekuruwe, in the Limpopo Province is indicated on the 1:250 000 Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria) (**Figure 3, Table 2-3**). The proposed development is underlain by intrusive rocks of the Goudplaats Gneiss Suite (Zg; apricot) The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Goudplaats-River Gneiss Suite has a Palaeontological Sensitivity of Zero (grey) (**Figure 4**). According to the DFFE screening report, the study area and surroundings are shown to generally have a Medium Sensitivity in terms of palaeontology (**Figure 5**). The geology has been updated (Council of Geosciences, Pretoria) and confirms that the Goudplaats-River Gneiss Suite underpins the research region (**Figure 6**).



The Precambrium Goudplaats-Hout River Gneiss is about 3333 Ma old (Brandl, 1987; Robb *et al.*, 2006). The Limpopo Belt comprise of charnockite, granulite, orthogneiss, and various other volcanic rocks and overlies the Baberton Supergroup. The Limpopo Metamorphic Province (Limpopo Mobile Belt) comprise of the Sand River Gneiss, Beit Bridge Complex, the Messina Suite and the Bandelierkop Complex. These rocks are all igneous in origin and thus unfossiliferous.

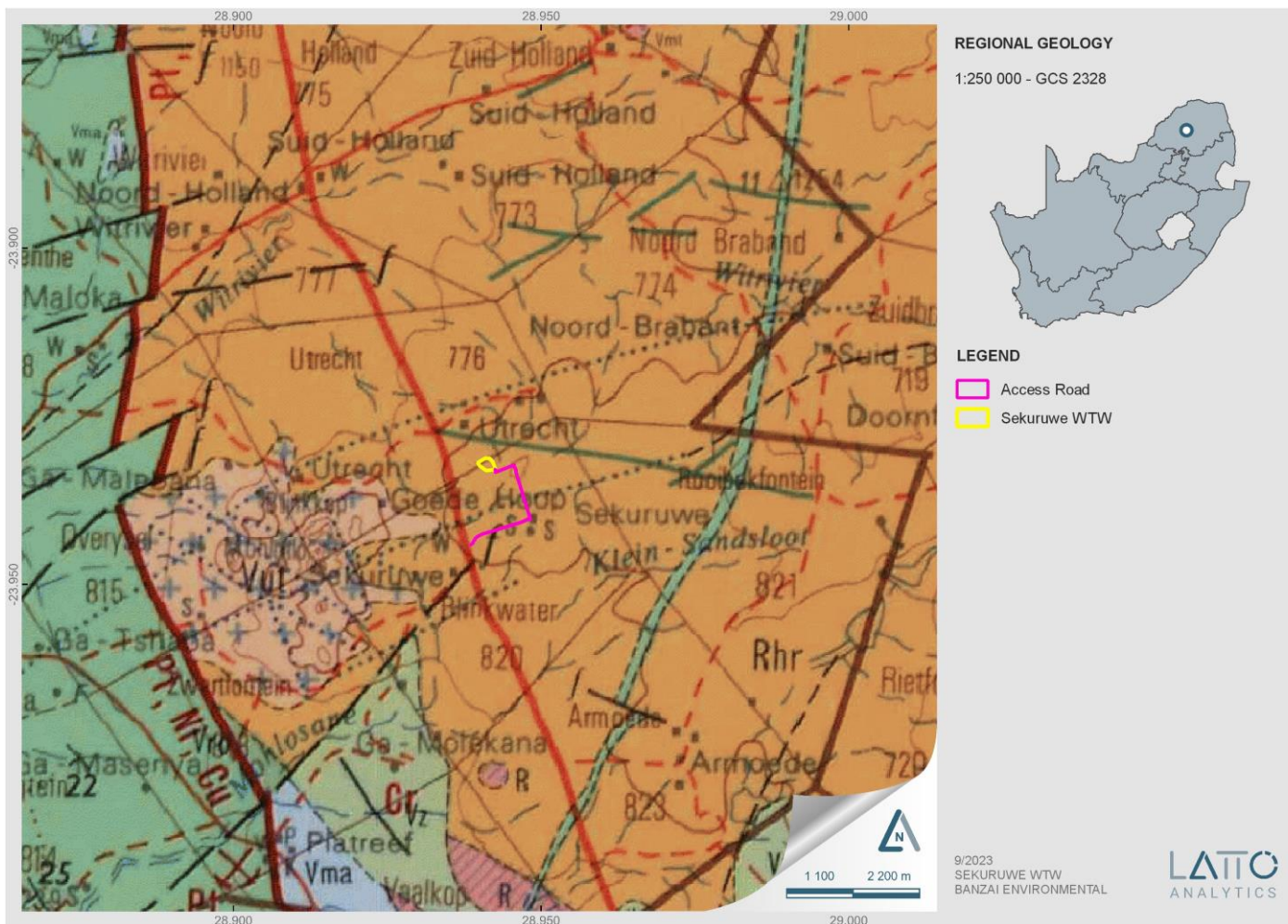


Figure 3: Extract of the 1:250 000 Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria) indicating that the proposed is underlain by the intrusive rocks of the Goudplaats Gneiss Suite.



Table 2: Legend of the Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria)

Rock formations present in the study area is indicated in a red polygon

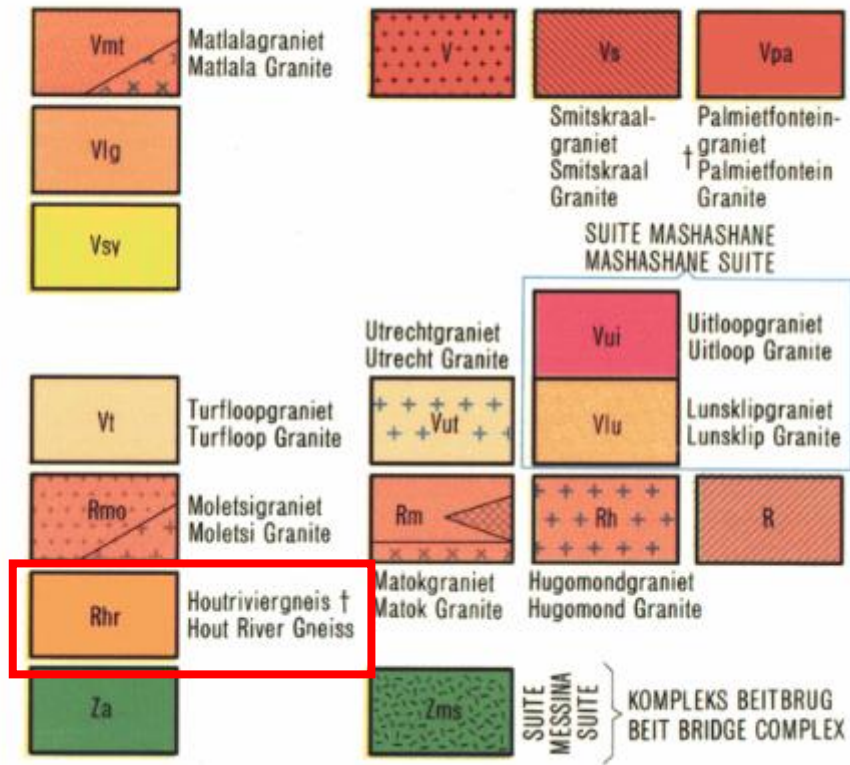




Table 3: Extract of the Palaeotechnical Report of the Limpopo (Groenewald, et al., 2014).

Group / Complex / Belt	Formation	Lithology	Fossil Heritage	Comment
ARCHAEAN GRANITE-GNEISS BASEMENT	LIMPOPO BELT Beit Bridge Complex, Modipe Complex (Zmo, Zma, Zgu) Hout River Gneiss (ZRh) Goudplats Gneiss (Zgo; Zgh) Z23; Z26; Zme; Zmd; Zmd2; Zmd3; Zmd4; Zgu3; Zgu4; Zgu5; Zgu6; Zme1; Vpl; M24; M21; Vkd; Zmp; Z57; Z58; V10; Z56; Zmk; V1; Z1; Z54	Intrusive granitoids, gneisses, migmatites Early to Late Archaean (3.6 – 2.4 Ga) (Swazian / Randian) Basic (and ultrabasic?) intrusive rocks (gabbro, etc.)	No fossils recorded	These ancient rocks build one of the oldest surviving blocks of continental crust (Kaapvaal Craton) The famous Sand River Gneisses of the Limpopo Belt near Messina (National Monument) are spectacular examples of highly metamorphosed early crustal rocks (3.4 to 3.2 Ga)

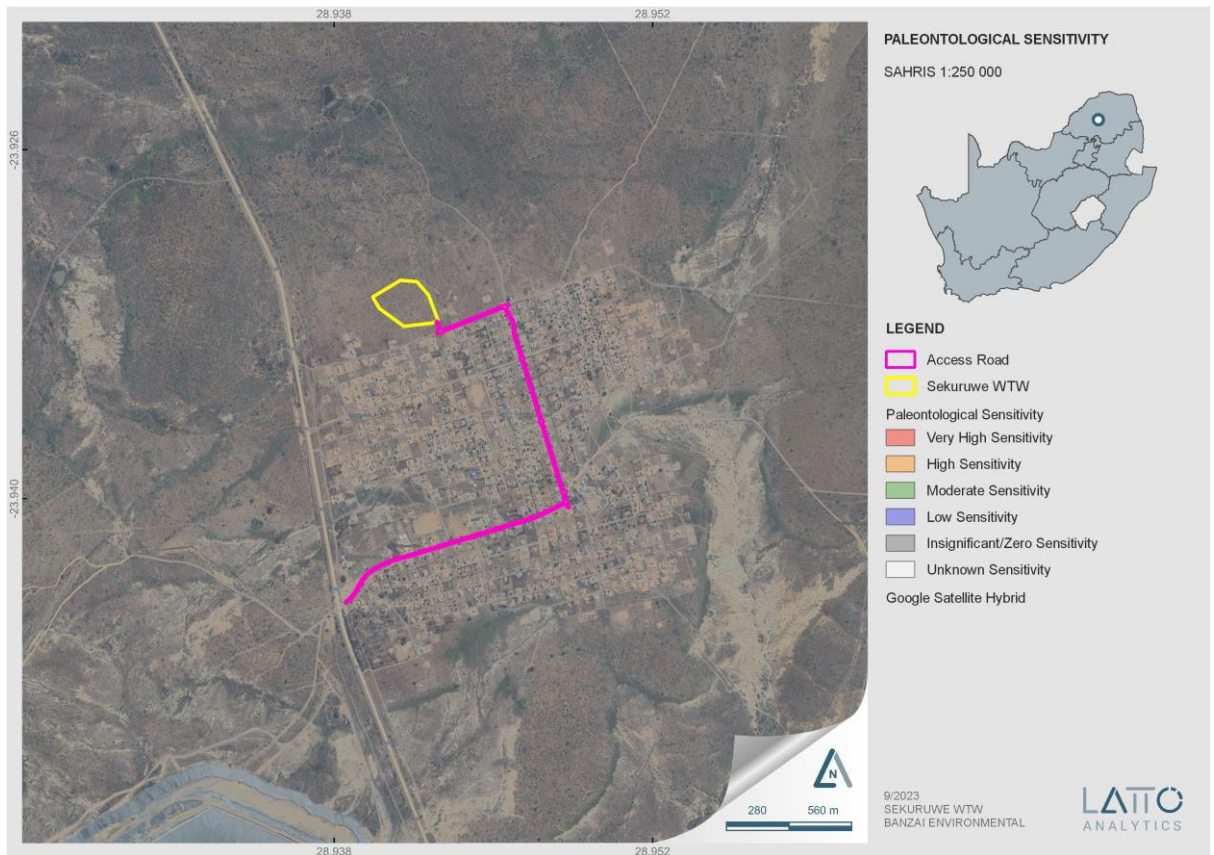


Figure 4: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the study area is underlain by sediments with a Zero (grey).

Table 4: Palaeontological Sensitivity according to the SAHRIS PalaeoMap (Almond et al, 2013; SAHRIS website).

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.



5.1 Sensitivity rating

A screening report was compiled by the Department of Environmental Affairs National Web-based Environmental Screening Tool as required by Regulation 16(1)(v) of the Environmental Impact Assessment Regulations 2014, as amended.

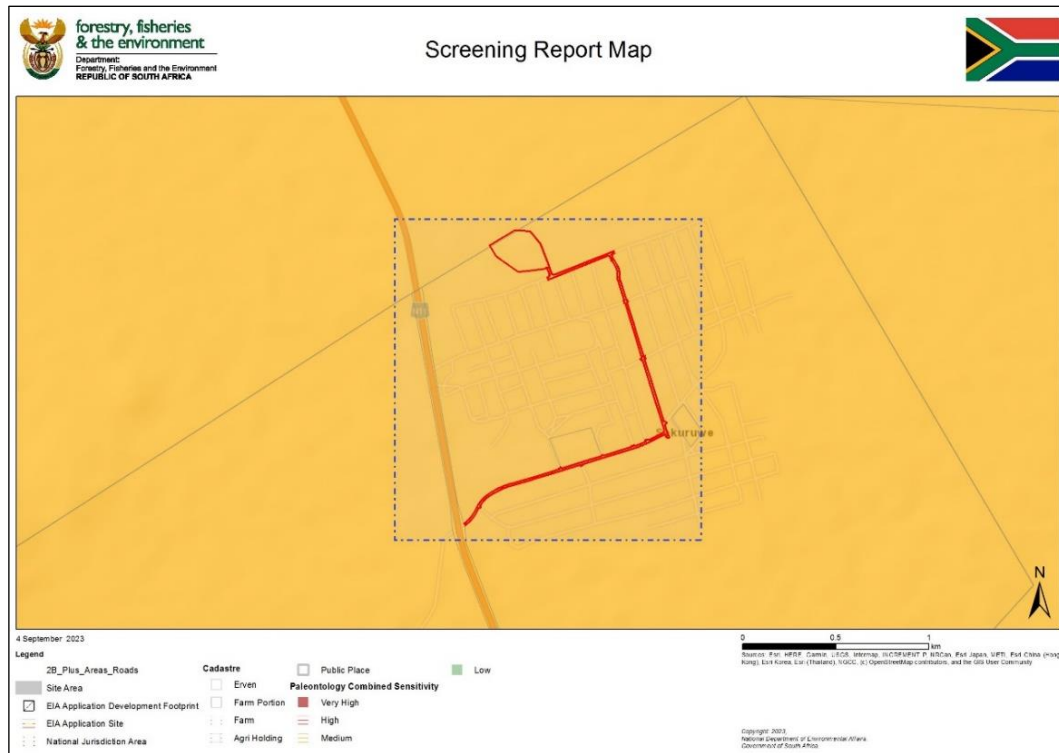


Figure 5: Screening tool map indicating a primarily low sensitivity rating for palaeontology for the study area and surroundings.

The SAHRIS PalaeoMap as well as the DFFE Screening Tool indicates that the proposed development has an Overall LOW Palaeontological Sensitivity

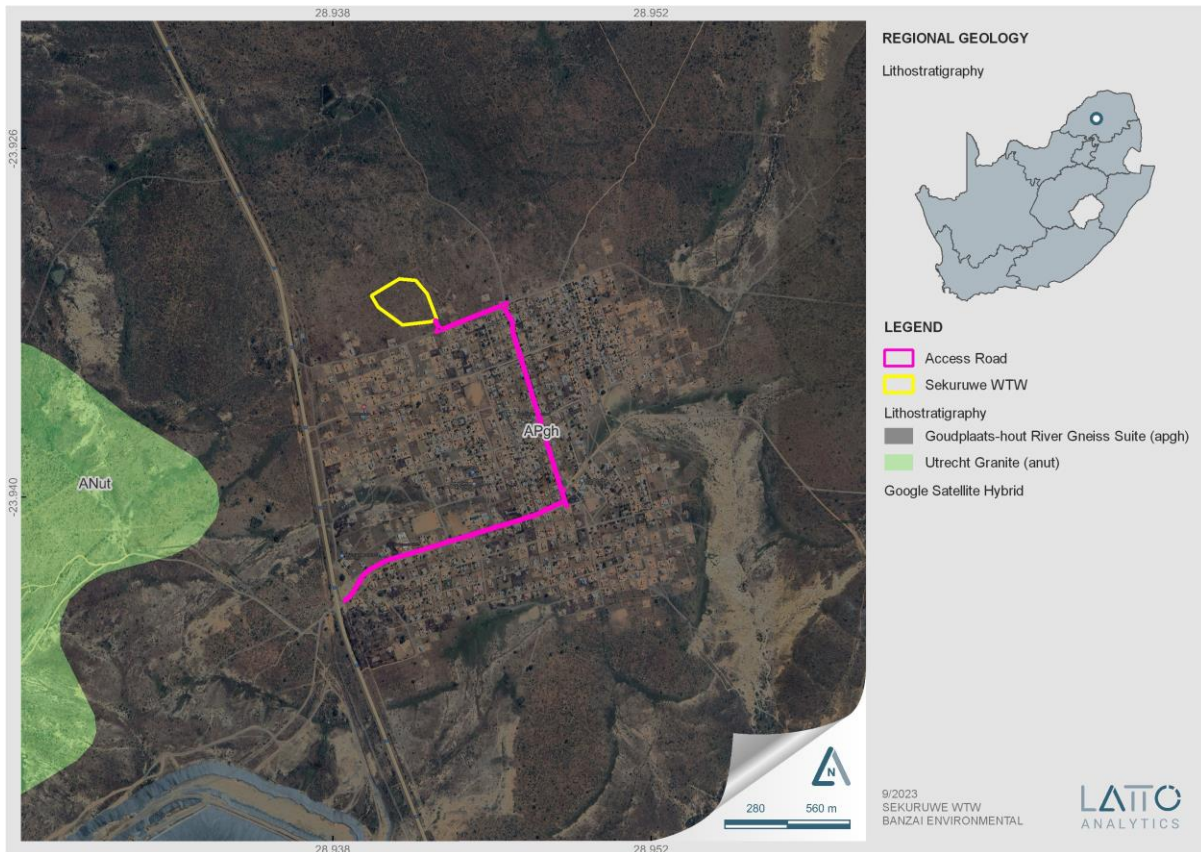


Figure 6: Updated Geology (Council of Geosciences, Pretoria) of the proposed Sekuruwe Water Treatment Works indicates that the development is underlain by the Goudplaats-hout River Gneiss Suite (apgh).

6 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)
- A Google Earth map with polygons of the proposed development was obtained from PGS Heritage
- 1:250 000 Pietersburg 2328 (1985) Geological Map (Council for Geosciences, Pretoria).
- Palaeotechnical report of the Limpopo Province (Groenewald et al, 2014).

7 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 5: The rating system

Project phase	Construction	
Impact	Impact on Presently Unknown Fossil Heritage Resources	
Description of impact	Destruction / Damage to Presently Unknown Heritage Resources	
Mitigability	High	Mitigation exists and will reduce the significance of impacts
Potential mitigation	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 be informed. These discoveries ought to be protected and the ECO 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 paleontologist.	
Assessment	Without mitigation	With mitigation
Nature	Negative	Negative
Duration	Long-term	Long-term
Extent	Site	Site
Intensity	Negligible	Negligible
Consequence	Negligible	Negligible



Probability	Very unlikely	Very unlikely
Significance	Very Low	Very Low - negative

8 FINDINGS AND RECOMMENDATIONS

The proposed development is underlain by the Goudplaats Gneiss Suite. The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the Goudplaats-River Gneiss Suite has a Palaeontological Sensitivity of Zero. The geology has been updated (Council of Geosciences, Pretoria) and confirms that the Goudplaats-River Gneiss Suite underpins the research region.

A Low Palaeontological Significance has been allocated to the development footprint. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

However, 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 be informed. These discoveries ought to be protected and the ECO 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 paleontologist.

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

ENVIRONMENTAL IMPACT ASSESSMENT (EIA) METHODOLOGY

The Environmental Impact Assessment (EIA) Methodology assists in evaluating the overall effect of a proposed activity on the environment. Determining of the significance of an environmental impact on an environmental parameter is determined through a systematic analysis.

METHODOLOGY USED IN DETERMINING THE SIGNIFICANCE OF ENVIRONMENTAL IMPACTS

This section briefly outlines the proposed method for assessing the significance of the potential environmental and socio-economic impacts identified during the construction, operational and decommissioning phase.

For each predicted impact, criteria are applied to establish the significance of the impact based on likelihood (probability) and consequence, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place.

The criteria that contribute to the consequence of the impact are **INTENSITY** (the degree to which pre-development conditions are changed); the **DURATION** (length of time that the impact will continue); and the **EXTENT** (spatial scale) of the impact. The sensitivity of the receiving environment and/or sensitive receptors is incorporated into the consideration of consequence by appropriately adjusting the thresholds or scales of the intensity, duration and extent criteria, based on expert knowledge. For each impact, the specialist applies professional judgement to ascribe a numerical rating for each criterion according to the ratings provided. The consequence is then established using the formula:

$$\text{Consequence} = \text{intensity} \times (\text{duration} + \text{extent})$$

Depending on the numerical result of this calculation, the impact's consequence would be classified as one of the following:

- ▶ Extremely; highly; moderately; slightly detrimental;
- ▶ Negligible; or
- ▶ Slightly, moderately, highly or extremely beneficial.

To determine the significance of an impact, the probability (or likelihood) of that impact occurring is also taken into account. In assigning probability, the specialist must take into account the likelihood of occurrence and the degree of uncertainty and detectability of the impact. Significance is calculated according to the following formula:

$$\text{Significance} = \text{consequence} \times \text{probability}$$

Depending on the numerical result of this calculation, the impact would fall into a significance category of one of the following:

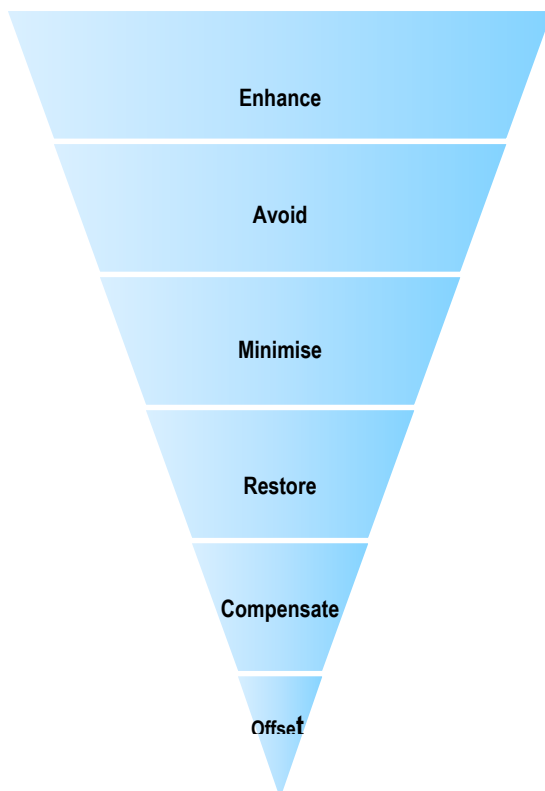


- ▶ Very Low;
- ▶ Low (negative or positive);
- ▶ Moderate (negative or positive);
- ▶ High (negative or positive);
- ▶ Very High (negative or positive).

METHODOLOGY FOR IDENTIFICATION OF MITIGATION MEASURES

The mitigation hierarchy (**Error! Reference source not found.**) illustrates the actions which can be undertaken to respond to negative impacts and the preference given to mitigation measures. The topmost measures are preferred, and the preference for mitigation measures decreases the further one moves down the hierarchy.

For each impact assessed, mitigation measures will be proposed to reduce and/ or avoid negative impacts and enhance positive impacts. The mitigation measures identified by the specialists will be reviewed for feasibility with the proponent and then incorporated into the Environmental Management Programme (EMPr) during the EIA Phase to ensure that they are implemented throughout the lifecycle of the proposed project. The EMPr would become a legally binding document should this project receive an Environmental Authorisation.



Impact avoidance: This step is most effective when applied at an early stage of project planning. It can be achieved by:

- ▶ Not undertaking certain projects or elements that could result in adverse impacts;
- ▶ Avoiding areas that are environmentally sensitive; and
- ▶ Putting in place preventative measures to stop adverse impacts from occurring.

Impact minimisation: This step is usually taken during impact identification and prediction to limit or reduce the degree, extent, magnitude, or duration of adverse impacts. It can be achieved by:

- ▶ Scaling down or relocating the proposal;
- ▶ Redesigning elements of the project; and
- ▶ Taking supplementary measures to manage the impacts.

Impact compensation: This step is usually applied to remedy unavoidable residual adverse impacts. It can be achieved by:

- ▶ Example, by habitat enhancement;
- ▶ Restoration of the affected site or environment to its previous state or better; and
- ▶ Replacement of the same resource values at another location (off-set), for example, by wetland engineering to provide

The mitigation described in the above diagram represents the full range of plausible and pragmatic measures that can be implemented.

Mitigation Hierarchy



APPENDIX B

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 30 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 1998–2022

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