



PALAEONTOLOGICAL IMPACT ASSESSMENT

ZIBULO COLLIERY 132 KV POWERLINE AND SUBSTATION PROJECT

August 2023

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: CONTACT PERSON: Banzai Environmental (Pty) Ltd Elize Butler Tel: +27 844478759 Email: info@banzai-group.com

SIGNATURE:





This Palaeontological Impact Assessment report has been compiled considering the National Environmental Management Act 1998 (NEMA) and Environmental Impact Regulations 2014 as amended, requirements for specialist reports, Appendix 6, as indicated in the table below.

Table 1: NEMA Table Deguinements of Appendix 6 CN D226 EIA Degulations	Delevent conting in report
Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report
1.(1) (a) (i) Details of the specialist who prepared the	Page ii and Section 2 of Report –
report	Contact details and company and
	Appendix A
(ii) The expertise of that person to compile a	Section 2 – refer to Appendix A
specialist report including a curriculum vitae	
(b) A declaration that the person is independent in a	Page ii of the report
form as may be specified by the competent	
authority	
(c) An indication of the scope of, and the purpose for	Section 4 -Methods and TOR
which, the report was prepared	
(cA) An indication of the quality and age of base data	Section 5 – Geological and
used for the specialist report	Palaeontological history
(cB) a description of existing impacts on the site,	Section 9
cumulative impacts of the proposed development	
and levels of acceptable change;	
(d) The duration, date and season of the site	Section 1, 8 and 10
investigation and the relevance of the season to	
the outcome of the assessment	
(e) a description of the methodology adopted in	Section 4 -Methods and TOR
preparing the report or carrying out the specialised	
process inclusive of equipment and modelling	
used	
(f) details of an assessment of the specific identified	Section 1 and 10
sensitivity of the site related to the proposed	
activity or activities and its associated structures	
and infrastructure, inclusive of a site plan	
identifying site alternative;	
(g) An identification of any areas to be avoided,	Section 5
including buffers	



Table 1: NEMA Table		
Requirements of Appendix 6 – GN R326 EIA Regulations of 7 April 2017	Relevant section in report	
	No buffers or areas of sensitivity	
	identified	
(h) A map superimposing the activity including the	Section 5 – Geological and	
associated structures and infrastructure on the	Palaeontological history	
environmental sensitivities of the site including		
areas to be avoided, including buffers;		
(i) A description of any assumptions made and any	Section 4.1 – Assumptions and	
uncertainties or gaps in knowledge;	Limitation	
(j) A description of the findings and potential	Section 1and 10	
implications of such findings on the impact of the		
proposed activity, including identified alternatives,		
on the environment		
(k) Any mitigation measures for inclusion in the EMPr	Section 11	
(I) Any conditions for inclusion in the environmental	Section 1and 10	
authorisation		
(m) Any monitoring requirements for inclusion in the	Section 1and 10	
EMPr or environmental authorisation		
(n)(i) A reasoned opinion as to whether the	Section 1and 10	
proposed activity, activities or portions thereof		
should be authorised and		
(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,	Section 1and 10	
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		
(o) A description of any consultation process that	N/A	
was undertaken during the course of carrying out		
the study		
(p) A summary and copies if any comments that	N/A	
were received during any consultation process		

Table 1: NEMA Table	
Requirements of Appendix 6 – GN R326 EIA Regulations	Relevant section in report
of 7 April 2017	
(q) Any other information requested by the competent	N/A
authority.	
(2) Where a government notice by the Minister provides	Section 3 compliance with SAHRA
for any protocol or minimum information requirement to	guidelines
be applied to a specialist report, the requirements as	
indicated in such notice will apply.	

EXECUTIVE SUMMARY

PGS Heritage commissioned Banzai Environmental to conduct the Palaeontological Impact Assessment (PIA) for the proposed Zibulo Colliery 132KV Powerline and Substation project located in the City of eMalahleni Metropolitan Municipality, Nkangala District Municipality, Mpumalanga Province. This PIA is required to confirm if fossil material could potentially be present in the approved development area and to evaluate the potential impact of the proposed changes to the development on the Palaeontological Heritage under 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).

The Vryheid Formation (Ecca Group, Karoo Supergroup) and Jurassic dolerite underpin the proposed Powerline Project. According to the South African Heritage Resources Information System (SAHRIS), the Palaeontological Sensitivity of the Vryheid Formation (Ecca Group) is Very High, whereas that of Karoo Dolerite is Zero because it is igneous in origin and thus unfossiliferous (Almond et al, 2013; SAHRIS website).

On 18 August, 2023, a site-specific field survey of the development footprint was done both on foot and by car. There were no fossiliferous outcrops found in the area where construction is planned. According to the site investigation and desktop research, fossil heritage of scientific and conservation relevance is rather uncommon in the total development footprint. In contrast, the SAHRIS Palaeosensitivity Map and DFFE Screening Tool assigned a Very High Sensitivity to the development region. A Medium Palaeontological value has been assigned to the PV development construction phase prior to mitigation and a Low value after mitigation. The construction phase will be the only development phase that will have an influence on Palaeontological Heritage, with no significant impacts projected during the operational or decommissioning stages.

Because the No-Go Alternative evaluates the alternative of 'doing nothing' and maintaining the *status quo*, it will have a Neutral influence on the development's Palaeontological Heritage. The cumulative impact of the development are medium pre-mitigation and low post-mitigation, which are within the project's allowable limits. As a result, it is anticipated that the projected development will not have a negative influence on the area's palaeontological resources.

As the development footprint is not considered sensitive in terms of palaeontological resources, construction of the development may thus be approved in its entirety. It is thus suggested that no additional palaeontological heritage research, ground truthing, or specialised mitigation be undertaken until new found fossils are identified.

If fossil remains are discovered during any phase of construction, whether on the surface or revealed through excavations, the Environmental Control Officer (ECO) in charge of these activities is required to follow the Chance Find Procedure as contained in the Generic EMPR as it is adequate to mitigate the impact.

Therefore, it is advised that no additional palaeontological heritage studies, fieldwork, or expert mitigation are needed until fossils are found.



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GLOSSARY OF TERMS

Fossil



Mineralized bones of vertebrate and invertebrate animals, as well as plants. A trace fossil is the traces of animals/plants preserved in stone.

Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act No 25 of 1999).

Heritage resources

This means any place or object of cultural significance and can include (but not limited to) as stated under Section 3 of the NHRA,

- places, buildings, structures, and equipment of cultural significance.
- places to which oral traditions are attached or which are associated with living heritage.
- historical settlements and townscapes.
- landscapes and natural features of cultural significance.
- geological sites of scientific or cultural importance.
- archaeological and palaeontological sites.
- graves and burial grounds, and
- sites of significance relating to the history of slavery in South Africa.

Palaeontology

Any fossilised remains or fossil trace of animals or plants which lived in the geological past (other than fossil fuels or fossiliferous rock intended for industrial use) and any site which comprises of fossilised remains or traces of past life.



LIST OF ABBREVIATIONS

BA	Basic Assessment	
DEA	Department of Environmental Affairs	
DFFE	Department of Forestry, Fisheries and the Environment	
СА	National Competent Authority	
EAP	Environmental Assessment Practitioner	
ECO	Environmental Control Officer	
EMPr	Environmental Management Programme	
ESO	Environmental Site Officer	
HIA	Heritage Impact Assessment	
Ма	Millions of years ago	
NEMA	National Environmental Management Act	
NHRA	National Heritage Resources Act	
PIA	Palaeontological Impact Assessment	
PL	Powerline	
PSSA	Palaeontological Society of South Africa	
SAHRA	South African Heritage Resources Agency	
SAHRIS	South African Heritage Resources Information System	
S&EIA	Scoping & Environmental Impact Assessment	
ToR	Terms of Reference	

1 INTRODUCTION

Anglo American Inyosi Coal PTY LTD (the Applicant) has appointed Environmental Impact Management Services (EIMS) as the Environmental Assessment Practitioner (EAP) to assist with undertaking the necessary authorisation processes, including compiling the necessary reports and undertaking the statutory consultation processes, in support of the proposed project.

The proposed project and activity are proposed to be undertaken at the following location:

- Property Description: The proposed 125m powerline corridor is located on the following farms and portions: Leeuwfontein 219 (Portions: 0 RE, 12, 13, 21, 24, 35); Olga 35 (Portion 0 RE); Rietvlei 64 (Portion: 0 RE, 1, 4, 7); Smithfield 44 (Portions: 1, 2, 3, 4, 5); Zondagsfontein 253 (Portions: 0 RE, 3, 4, 5, 6, 7, 8, 9, 12, 13, 14, 15).
- Central Co-ordinates:
 - o Cologne Substation 26° 7'24.26"S, 28°59'46.03"E.
 - o Modiri Substation 26°12'11.37"S, 29° 1'17.01"E.
 - o Zibulo North Shaft Substation 26° 8'56.88"S, 28°57'22.38"E.
- Physical Address: Zibulo North Shaft.
- Regional Description:
 - o District Municipality: Nkangala.
 - o Local Municipality: Victor Khanye and Emalahleni.
 - Province: Mpumalanga Province.
- Closest town or point of interest: Zibulo North Shaft entrance is located at 26° 8' 55.0" S, 28° 57' 10.32" E, approximately 6.6 km south of Kendal Power Station and approximately 14.5 km Southwest of Ogies.
- The entirety of the proposed powerline project falls within the Electrical Generation Infrastructure (EGI) International Corridor as defined in the Department of Forestry, Fisheries and Environment, 2022 Standard for the Development and Expansion of Power Lines and Substations within identified Geographical Areas (Revision 2).

1.1 Project Description

Zibulo North Shaft requires a 20MVA electricity supply for the mining operations by 2025. The following assets will be established for the supply:

- A new Zibulo North Shaft 132/11kV 2x20MVA Substation for the Zibulo North Shaft Point of Supply (POS). 2x20MVA TRFR's will be installed in phase 1 with an open TRFR bay for the installation of the third TRFR in 2032 should it be required.
- Establish 132kV Feeder Bay at the existing Cologne Substation.
- Build 7km (option 1 & 2) Kingbird 132kV line from Cologne Substation to Zibulo North Shaft Substation.
- Establish 132kV Feeder Bay at the existing Modiri Substation.
- Build 10.5km (option 1) or 15km (option 2) Kingbird 132kV line from Modiri Substation to the Zibulo North Shaft Substation. The route options will be assessed during the course of this environmental application process.

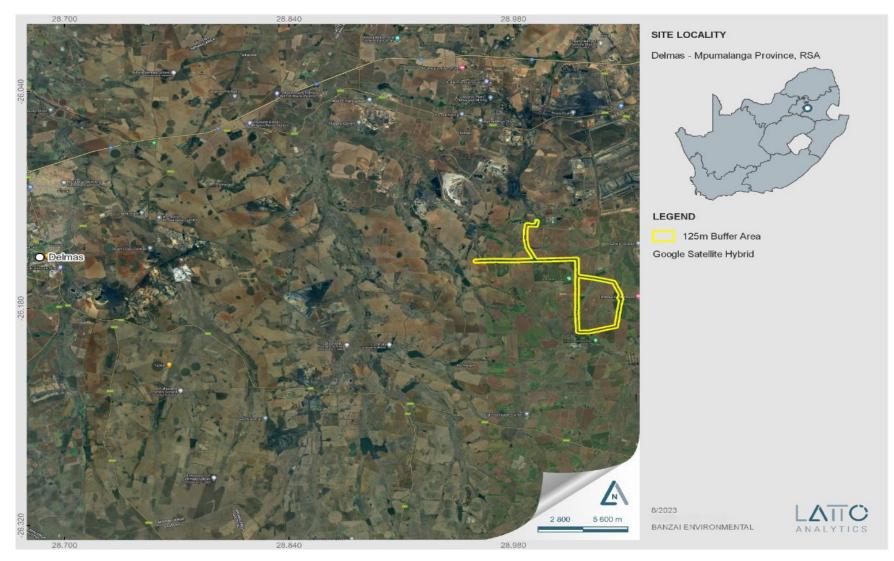


Figure 1: Regional locality of the proposed 132 kV Zibulo PL in Mpumalanga Province.

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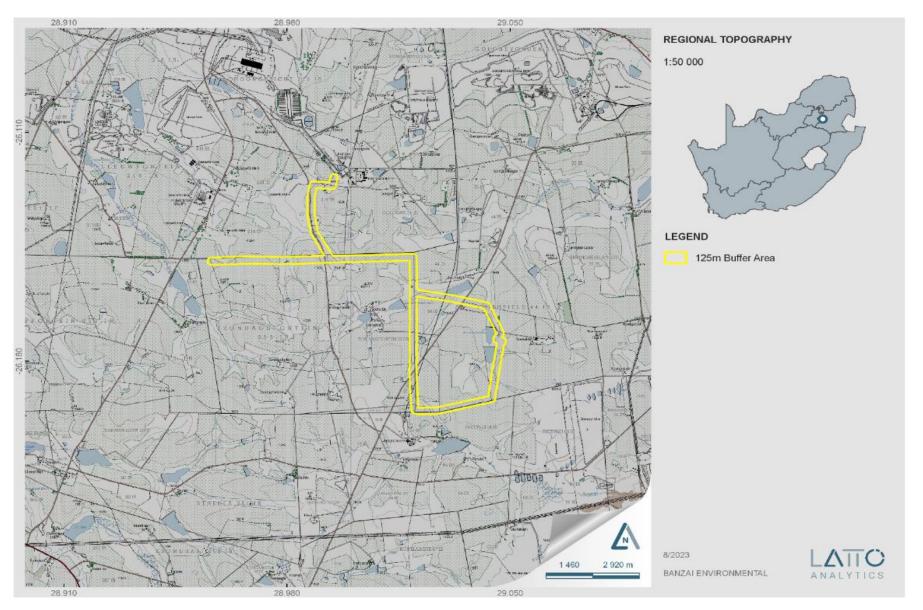


Figure 2: Locality of the proposed 132 KV Zibulo PL in Mpumalanga Province.

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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 LEGISLATION

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

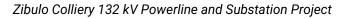
The NEMA (No 107 of 1998) states that an integrated EMP should (23:2 (b)) "...identify, predict and evaluate the actual and potential impact on the environment, socio-economic conditions and cultural heritage".

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.



4 METHODS AND TERMS OF REFERENCE

This PIA 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 PALAEONTOLOGICAL HISTORY

The geology of the proposed Zibulo PL in Mpumalanga is depicted on the 1: 250 000 **East**-Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria) (**Figure 3; Table 2**). The study area is underlain by the Vryheid Formation (Ecca Group) (Pv, khaki) with small areas of Jurassic dolerite (Jd, red). The PalaeoMap of the South African Heritage Resources Information System (SAHRIS) indicates that the the Palaeontological Sensitivity of the Vryheid Formation (Ecca Group, Karoo Supergroup) is Very High, while that of Jurassic dolerite is Zero (**Figure 4, Table 3**) (Almond *et al*, 2013; SAHRIS website). The suggested location is classified as having a Very High Palaeontology Theme Sensitivity in the DEA Screening Report, as seen in **Figure 5**. Updated geology (Council for Geosciences, Pretoria) corresponds with that in the 1986 Geological Map (**Figure 6**).

The Karoo igneous province is a classic continental basalt (CFB) province of the world. This province is made up of intrusive and extrusive rocks that are spread across a broad area (Duncan et al, 2006). Flood basalts, in general, do not contribute to notable volcanic structures, but rather are generated by successive eruptions from a set of fissures that form sub-horizontal lava flows (sills and dykes) of different thickness. This lava has capped the landscape where they erupted. Because the Karoo is an old flood basalt province, it has been preserved as erosional shards of a larger lava cap that formerly covered most of southern Africa. The Karoo lava outcrop is believed to encompass at least 140 000 km2, but it was greater in the past [2 000 000 km2 (Cox 1970, 1972)].

The Karoo Igneous Province is rich in flood basalts as well as silicic volcanic rocks. These units, which are made up of rhyodacite and rhyolitic magma, appear along the Lebombo monocline. Individual units can span up to 60 km and exhibit large pyroclastic structures, classifying them as rheoignimbrites. The base lavas are conformable to the Clarens Formation, however sandstone erosion occurred prior to the volcanic eruptions in some locations. Lock et al. (1974) discovered evidence in the Eastern Cape that magma interacted with ground water to form volcaniclastic deposits as well as phreaatic and phreatomagmatic diatremes during the early stages of volcanism. Eales et al. (1984) discovered pillow lavas and related hyaloclastite breccias, as well as thin lenses of fluviatile sandstones interbedded with the lowermost magmas, as evidence of aquatic environments during early volcanism.



The Vryheid Formation is known to have a diverse assemblage of Glossopteris flora (spathulate, reticulate-veined leaves), which is the Vryheid Formation's source vegetation. After continental deglaciation, Gymnospermous glossopterids (**Figure 7**) dominated the peat and non-peat substrates of Permian wetlands (Falcon, 1986c, Greb et al., 2006).

Adendorff (2005), Bordy and Prevec (2008), Prevec et al. (2008, 2009, 2010), and Prevec (2011) are examples of recent palaeobotanical studies. Bamford (2011) has described numerous plant fossils from this formation (e.g., Azaniodendron fertile, Cyclodendron leslii, Sphenophyllum hammanskraalensis, Annularia sp., Raniganjia sp., Asterotheca spp., Liknopetalon enigmata, Hirsutum sp., Scutum sp., Ottokaria sp., Estcourtia sp., Arberia sp., Lidgetonnia sp., Noeggerathiopsis sp., Podocarpidites sp as well as more than 20 Glossopteris species. Palynological investigations on the coal-bearing successions of the Vryheid Formation have previously included publications by Aitken (1993, 1994, 1998) and Millsteed (1994, 1999), with more recent studies undertaken by Götz and Ruckwied, (2014).

According to Bamford (2011), just a little amount of data on these possibly fossiliferous deposits has been published, and that good material is most likely present around coal mines whereas exposures are poor and of little interest in other regions. Plant fossils are frequently numerous when they do appear. Bamford believes that while it is not possible to preserve all fossiliferous sites, they should be adequately documented and explored in the interests of science. Fossils must be stored in an accredited institution (e.g., Iziko Museum, Ditsong Museum, Wits Evolutionary Studies Institute (ESI), Grahamstown Museum, National Museum Bloemfontein).

No fossil vertebrates have been found in the Vryheid formation to date. Fossil insects are uncommon, although palynomorphs are diverse. This deposit has also yielded non-marine bivalves and fish scales. Trace fossils are abundant, but their diversity is limited. Mesosaurus (**Figure 8**) is a mesosaurid lizard that has been found in the southern regions of the basin but may potentially be found in other places of the Vryheid formation. Although fossils are uncommon in this biozone, a single fossil may be scientifically significant because numerous fossil taxa are known from a single specimen.

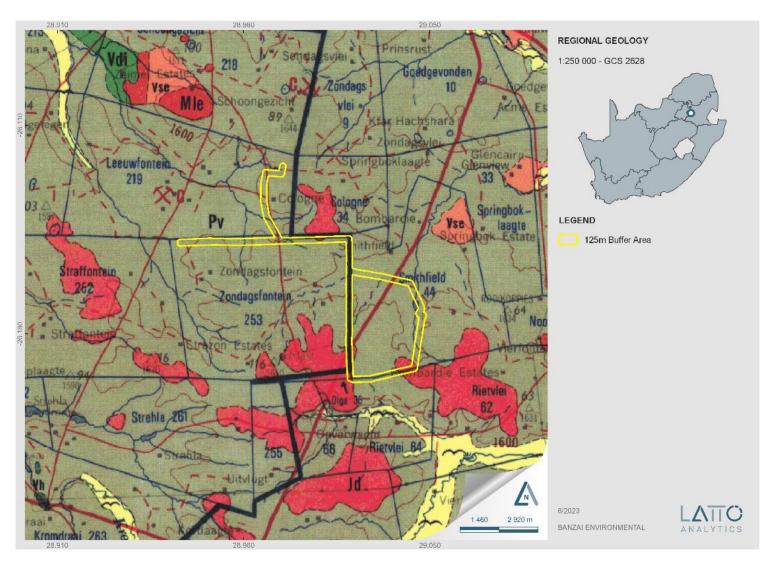
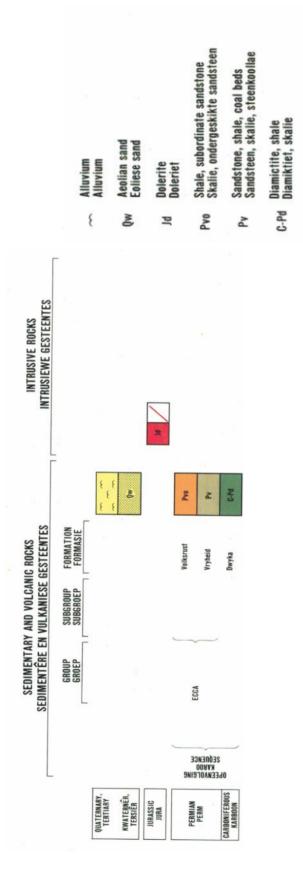


Figure 3: Extract of the 1:250 000 East-Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria) indicates that the study area is underlain by the Vryheid Formation (Ecca Group) (Pv, khaki) with small areas of Jurassic dolerite (Jd, red).

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Zibulo Colliery 132 kV Powerline and Substation Project **Table 2**: Legend to the East-Rand 2626 (1986) Geological Map (Council for Geosciences, Pretoria).



Zibulo Colliery 132 kV Powerline and Substation Project

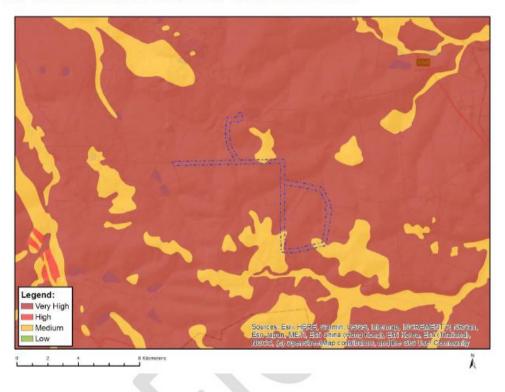


Figure 4: Extract of the SAHRIS PalaeoMap map (Council of Geosciences) indicates that the study area is underlain by sediments with a Very High (red) and Zero (grey) Palaeontological Sensitivity.

Table 3: Palaeontological Sensitivity indicated by the SAHRIS PalaeoMap (Almond et al, 2013; SAHRI	S
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.



MAP OF RELATIVE PALEONTOLOGY THEME SENSITIVITY

Very High sensitivity	High sensitivity	Medium sensitivity	Low sensitivity
X			

Sensitivity Features:

Sensitivity	Feature(s)
Medium	Features with a Medium paleontological sensitivity
Very High	Features with a Very High paleontological sensitivity

Figure 5: Palaeontological Sensitivity generated by the National Environmental Web-Based Screening indicating the Very High Palaeontological Sensitivity of the proposed development, while areas with a Medium Sensitivity also underlies the study area.

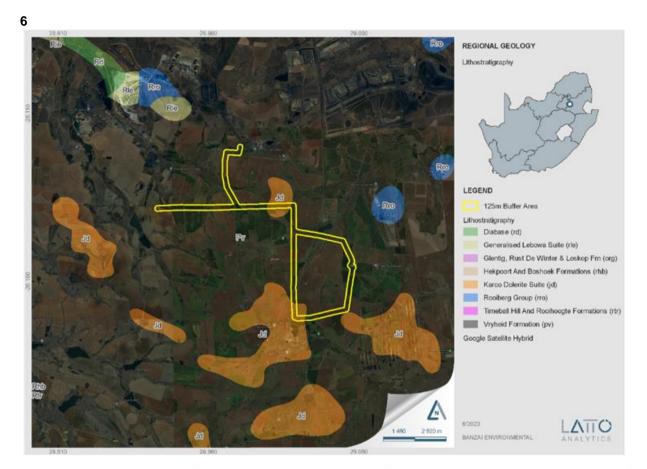


Figure 6 Updated Geology (Council of Geosciences, Pretoria) indicates that the study area is largely underlain by the Vryheid Formation (Pv, Ecca Group, Karoo Supergroup) with small patches of the Karoo Dolerite Suite (Jd).



Figure 6: Examples of Glossopteris leaves (Prevec et al 2009).



Figure 7: Mesosaurus sp. National Museum specimen NMQR3536.



6 GEOGRAPHICAL LOCATION OF THE SITE

The proposed PL development is approximately 6.6 km south of Kendal Power Station and approximately 14.5 km Southwest of Ogies **(Figure 1-2**).

7 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 East-Rand 2628 (1986) Geological Map (Council for Geosciences, Pretoria).
- Updated Geology produced by the Council of Geosciences (Pretoria).
- Palaeosensitivity map on SAHRIS website.
- The National Environmental Web-based Screening Tool.
 PIAs in the area include that of Fourie 2022 (see references).

8 SITE VISIT

A site-specific field survey of the development footprint was conducted on foot and by motor vehicle on 18 August 2023. The area is utilized as agriculture pastures and highly disturbed. No fossiliferous outcrops were identified during the site visit.





Figure: 8 General view over the northern margin of the proposed PL development.





Figure 9: General view over the middle portion of the proposed PL development.





Figure 10: General view over the southern portion of the proposed PL development.

9 IMPACT ASSESSMENT METHODOLOGY

9.1 Method of Environmental Assessment

An assessment of the impact significance of the proposed Zibulo PL Project in Mpumalanga indicates that development is underlain by the Vryheid Formation (Ecca Group, Karoo Supergroup, as well as Jurassic Dolerite of the Karoo Dolerite Suite.

Nature of the Impact

The proposed development will comprise of vegetation clearance and the construction of Powerlines, substations and related infrastructure.

Geographical extent of the impact

Impacts on fossil heritage will only occur during the construction phase of the development when new excavations into fresh potentially fossiliferous bedrock takes place. The extent of the area of potential impact is thus limited to the project site

Sensitive areas

The proposed PL and associated infrastructure is underlain by the Vryheid Formation that is Palaeontologically Highly Sensitive.

Duration of the Impact

The expected duration of the impact is potentially permanent too long term. In the absence of mitigation procedures (and if fossils are present in the development area) the harm or destruction of palaeontological heritage will be permanent.

Potential Significance of the Impact

The destruction/damage of fossil heritage in the development, will be permanent and irreversible. Any fossil heritage in the development area is considered to be of scientific and culturally significant and thus any negative impact on the fossil heritage will be highly significant.

Severity/ Beneficial scale

The development of the proposed Power line and substation Project is beneficial, not only on a local level, but regional as well. A secondary advantage of the construction of the project would be that the excavations may uncover fossils hidden beneath the surface and would have remained unknown to science.

Intensity of impact occurring

Probable significant impacts on palaeontological heritage during the construction phase are low.

Probability



According to the Geology of the proposed development, fossil heritage can be found in the proposed development.

Mitigation

If fossil heritage is present in the development footprint any negative or detrimental impact on these fossils can be mitigated by describing and collecting of the well-preserved fossils (by a professional palaeontologist). If fossil Heritage is discovered in the area the Chance Find Protocol must be implemented and a qualified palaeontologic must be appointed to conduct the mitigation. A SAHRA permit will be required for fossil collection and the fossil heritage must be housed in an accredited institution (university or museum).

Degree of irreversible Loss

Impacts on fossil heritage are generally irreversible. Scientifically all well-documented records and palaeontological studies of any fossils exposed during construction would represent a positive impact. The possibility of a negative impact on the palaeontological heritage of the area can be reduced by the implementation of adequate mitigation procedures. If mitigation is undertaken the benefit scale for the project will be beneficial.

Irreplaceable loss

Fossil heritage may be present in the fossiliferous sediments underlaying the development. Significant loss of fossil heritage may be limited by taking a precautionary approach.

Environmental parameter	Issues	Rating prior to mitigation	Average	Rating post mitigation	Average
Planning Phase the Zibulo Powerline and substation Project	No Impact		No Impact		
Construction Stage the Zibulo Powerline and substation Project	Destroy or permanently seal-in fossils at or below the surface that are then no longer available for scientific study	-13	Negative Medium impact	6	Low positive

Table 4: Summary of Impact Tables



Operational Phase the Zibulo Powerline and substation Project	No Impact	No Impact	No Impact
Decommissioning the Zibulo Powerline and substation Project	No Impact	No Impact	No Impact

10 FINDINGS AND RECOMMENDATIONS

The Vryheid Formation (Ecca Group, Karoo Supergroup) and Jurassic dolerite underpin the proposed Powerline Project. According to the South African Heritage Resources Information System (SAHRIS), the Palaeontological Sensitivity of the Vryheid Formation (Ecca Group) is Very High, whereas that of Karoo Dolerite is Zero because it is igneous in origin and thus unfossiliferous (Almond et al, 2013; SAHRIS website).

On 18 August, 2023, a site-specific field survey of the development footprint was done both on foot and by car. There were no fossiliferous outcrops found in the area where construction is planned. According to the site investigation and desktop research, fossil heritage of scientific and conservation relevance is rather uncommon in the total development footprint. In contrast, the SAHRIS Palaeosensitivity Map and DFFE Screening Tool assigned a Very High Sensitivity to the development region. A Medium Palaeontological value has been assigned to the PV development construction phase prior to mitigation and a Low value after mitigation. The construction phase will be the only development phase that will have an influence on Palaeontological Heritage, with no significant impacts projected during the operational or decommissioning stages.

Because the No-Go Alternative evaluates the alternative of 'doing nothing' and maintaining the *status quo*, it will have a Neutral influence on the development's Palaeontological Heritage. The cumulative impact of the development are medium pre-mitigation and low post-mitigation, which are within the project's allowable limits. As a result, it is anticipated that the projected development will not have a negative influence on the area's palaeontological resources.

As the development footprint is not considered sensitive in terms of palaeontological resources, construction of the development may thus be approved in its entirety. It is thus suggested that no additional palaeontological heritage research, ground truthing, or specialised mitigation be undertaken until new found fossils are identified.

If fossil remains are discovered during any phase of construction, whether on the surface or revealed through excavations, the Environmental Control Officer (ECO) in charge of these activities is required to



follow the Chance Find Procedure as contained in the Generic EMPR as it is adequate to mitigate the impact.

Therefore, it is advised that no additional palaeontological heritage studies, fieldwork, or expert mitigation are needed until fossils are found.

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APPENDIX A

CURRICULUM VITAE

PROFESSION:	Palaeontologist
YEARS' EXPERIENCE:	30 years in Palaeontology
EDUCATION:	B.Sc Botany and Zoology, 1988
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	B. Sc (Hons) Zoology, 1991
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	M. Sc. Cum laude (Zoology), 2009

Dissertation title: The postcranial skeleton of the Early Triassic non-mammalian Cynodont *Galesaurus planiceps*: implications for biology and lifestyle

University of the Free State

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



National Museum, Bloemfontein 1993 – 1997

Principal Research Assistant

National Museum, Bloemfontein

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