

**Palaeontological Impact Assessment for the proposed
Concordia sand mining project, NE of Okiep,
Northern Cape Province**

Desktop Study (Phase 1)

For

ASHA Consulting

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford
Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf
Experience: 32 years research; 24 years PIA studies

Declaration of Independence

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

Specialist: Prof Marion Bamford

Signature:

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

Executive Summary

A Palaeontological Impact Assessment was requested for the proposed mining of sand about 15 km southeast of Concordia and 20 km northeast of Okiep, Northern Cape Province. The mining site is adjacent to an ephemeral river.

To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development.

The proposed site lies on Quaternary sand, scree and sandy soil that has a very low palaeontological sensitivity but might have fragments of transported robust fossils from farther upstream. Therefore, a Fossil Chance Find Protocol should be added to the EMPr. Based on this information it is recommended that no further palaeontological impact assessment is required unless fossils are found by the miners or other designated responsible person once excavations and mining activities have commenced. As far as the palaeontology is concerned, the project should be authorised.

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1. Background

It is proposed to remove sand from a site in the river channel on Plot 1898 of the Concordia Communal Reserve. The site is about 8 km east of Concordia and about 17 km northeast of Okiep (Figures 1, 2). The sand will be for construction purposes.

A Palaeontological Impact Assessment was requested for the Concordia sand mining project. To comply with the regulations of the South African Heritage Resources Agency (SAHRA) in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act No. 25 of 1999) (NHRA), a desktop Palaeontological Impact Assessment (PIA) was completed for the proposed development and is reported herein.

Table 1: Specialist report requirements in terms of Appendix 6 of the EIA Regulations (amended 2017)

	A specialist report prepared in terms of the Environmental Impact Regulations of 2017 must contain:	Relevant section in report
ai	Details of the specialist who prepared the report	Appendix B
aii	The expertise of that person to compile a specialist report including a curriculum vitae	Appendix B
b	A declaration that the person is independent in a form as may be specified by the competent authority	Page 1
c	An indication of the scope of, and the purpose for which, the report was prepared	Section 1
ci	An indication of the quality and age of the base data used for the specialist report: SAHRIS palaeosensitivity map accessed – date of this report	Yes
cii	A description of existing impacts on the site, cumulative impacts of the proposed development and levels of acceptable change	Section 5
d	The date and season of the site investigation and the relevance of the season to the outcome of the assessment	N/A
e	A description of the methodology adopted in preparing the report or carrying out the specialised process	Section 2
f	The specific identified sensitivity of the site related to the activity and its associated structures and infrastructure	Section 4
g	An identification of any areas to be avoided, including buffers	N/A
h	A map superimposing the activity including the associated structures and infrastructure on the environmental sensitivities of the site including areas to be avoided, including buffers;	N/A
i	A description of any assumptions made and any uncertainties or gaps in knowledge;	Section 5
j	A description of the findings and potential implications of such findings on the impact of the proposed activity, including identified alternatives, on the environment	Section 4

k	Any mitigation measures for inclusion in the EMPr	Section 8, Appendix A
l	Any conditions for inclusion in the environmental authorisation	N/A
m	Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Section 8, Appendix A
ni	A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	Section 6
nii	If the opinion is that the proposed activity or portions thereof should be authorised, any avoidance, management and mitigation measures that should be included in the EMPr, and where applicable, the closure plan	Sections 6, 8
o	A description of any consultation process that was undertaken during the course of carrying out the study	N/A
p	A summary and copies if any comments that were received during any consultation process	N/A
q	Any other information requested by the competent authority.	N/A



Figure 1: Google Earth map of the proposed Concordia sand mining project (green dot in centre) to show relevant landmarks.



Figure 2: Google Earth map to show the extent of the Concordia sand mining operation.

2. Methods and Terms of Reference

The Terms of Reference (ToR) for this study were to undertake a PIA and provide feasible management measures to comply with the requirements of SAHRA.

The methods employed to address the ToR included:

1. Consultation of geological maps, literature, palaeontological databases, published and unpublished records to determine the likelihood of fossils occurring in the affected areas. Sources included records housed at the Evolutionary Studies Institute at the University of the Witwatersrand and SAHRA databases;
2. Where necessary, site visits by a qualified palaeontologist to locate any fossils and assess their importance (*not applicable to this assessment*);
3. Where appropriate, collection of unique or rare fossils with the necessary permits for storage and curation at an appropriate facility (*not applicable to this assessment*); and
4. Determination of fossils' representivity or scientific importance to decide if the fossils can be destroyed or a representative sample collected (*not applicable to this assessment*).

3. Geology and Palaeontology

i. Project location and geological context

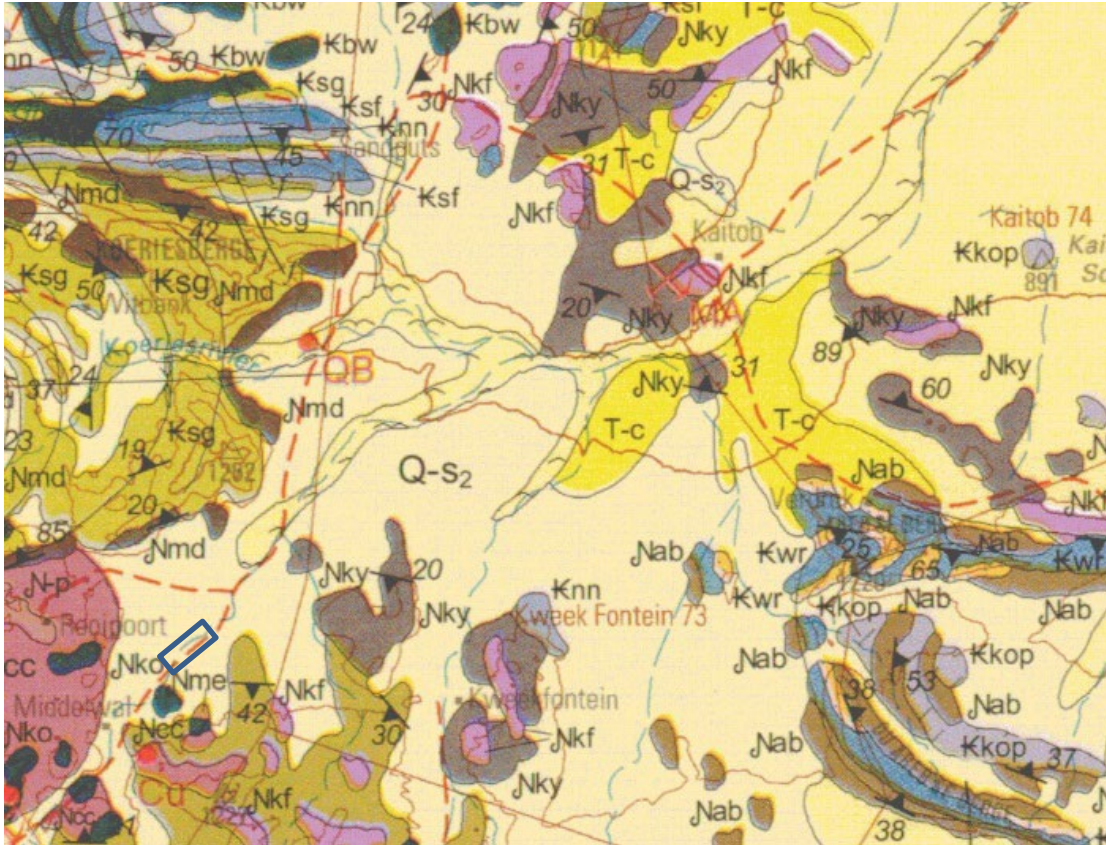


Figure 3: Geological map of the area around the proposed Concordia Sand mine with the location of the proposed project indicated within the blue rectangle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2918 Pofadder.

Table 2: Explanation of symbols for the geological map and approximate ages (Cornell et al., 2006. Partridge et al., 2006). SG = Supergroup; Fm = Formation; Ma = million years; grey shading = formations impacted by the project.

Symbol	Group/Formation	Lithology	Approximate Age
Q	Quaternary Kalahari sands	Alluvium, sand, calcrete	Neogene, ca 2.5 Ma to present
Q-S2	Quaternary Kalahari sands	Sand, scree, rubble, sandy soil	Neogene, ca 2.5 Ma to present
Tc	Tertiary calcretes	Calcrete	Tertiary
Nko	Koperberg Suite	Norite, diorite, anorthosite	Mesoproterozoic 1160 Ma
Ncc	Concordia Granite, Spektakel Suite	Epigranites, granites	Mesoproterozoic
Nky	Konklip Gneiss, Little Namaqualand Suite	Gneiss	Mesoproterozoic

Symbol	Group/Formation	Lithology	Approximate Age
Nmd	Modderfontein Gneiss	Gneiss	Mesoproterozoic 1212 Ma
Nme	Mosklip Granite, Little Namaqualand Suite	Granite	Mesoproterozoic
Nmb	Nababeep Gneiss	Gneiss	Mesoproterozoic

The proposed Concordia sand mine lies in the Namaqua-Natal Province in the Namaqua section (Figure 3, Table 2). The Namaqua-Natal Province is a tectono-stratigraphic province and forms the southern and western boundary of the ancient Kaapvaal Craton, and extends below the Karoo Basin sediments to the south (Cornell et al., 2006). It comprises rocks that were formed during the Namaqua Orogeny (mountain-building) some 1200 – 1000 million years ago. It has been divided by geologists into a number of terranes (similar lithology and bounded by shear zones). There are three main lithologic units used to separate the terranes as well as the shear zones but still there is some debate about the terranes (ibid). Very simply, the lithologic units are older reworked rocks, juvenile rocks formed during tectonic activities and metamorphosed, and intrusive granitoids.

According to Cornell et al. (2006) the five terranes are:

A - Richtersveld Subprovince (undifferentiated terranes)

B – Bushmanland Terrane (granites)

C – Kakamas Terrane (supracrustal metapelite ca 2000 Ma)

D – Areachap Terrane (supracrustal rocks and granitoids)

E – Kaaien Terrane (Keisian aged metaquartzites and deformed volcanic rocks).

The project lies in the **Bushmanland Terrane** with its northern boundary against the Richtersveld Subprovince and the eastern boundary against the Kakamas Terrance (ibid). According to Moore et al. (1990, in Cornell et al., 2006), the Bushmanland Terrane rocks can be divided into three distinct age group:

1. A basement complex (Achab Gneiss, Gladkop Suite) that is mainly composed of granitic rocks of Kheisian age (2050 - 1700 Ma).
2. A variety of supracrustal sequences of mixed sedimentary and volcanic origin and probably fitting into three broad age groups (ca 1900, 1600 and 1200 Ma).
3. Suites of syn- and late-tectonic Namaquan intrusive rocks, generally of granitic to charnockitic composition. This group includes the Little Namaqualand Suite (ca 1200 Ma), the Spektakel Suite (ca 1060 Ma) and the basic rocks of the Koperberg and Wortel Suites and Nouzees Complex (1060 – 1030 Ma), as well as the ca 950 Ma pegmatites.

The Namaqua-Natal Province rocks are volcanic in origin and frequently metamorphosed. Several outcrops occur in the area and probably underlie the Gordonias sands and Tertiary Calcretes.

Tertiary calcretes cover large parts of the Northern Cape but they are difficult to date and there are several schools of thought (see Partridge et al., 2006). Nonetheless, it is accepted that calcretes form under alternating cycles of humid and arid climatic conditions in strata that have calcium carbonate (Netterberg, 1969). More recent research using geophysical

techniques to measure uplift of the continent during the Cretaceous and tertiary, combined with the fossil record (Braun et al., 2014) suggest that there were two predominant humid periods during the Tertiary. The whole of the Eocene (56-33 Ma) and a short period during the early Miocene (ca 20-19 Ma) were humid according to their estimation. It is possible that the Northern Cape calcretes formed during one of these periods.

Overlying many of these rocks are loose sands and sand dunes of the Gordonia Formation, Kalahari Group of Neogene Age. The Gordonia Formation is the youngest of six formations and is the most extensive, stretching from the northern Karoo, Botswana, Namibia to the Congo River (Partridge et al., 2006). It is considered to be the biggest palaeo-erg in the world (ibid). The sands have been derived from local sources with some additional material transported into the basin (Partridge et al., 2006). Much of the Gordonia Formation comprises linear dunes that were reworked a number of times before being stabilised by vegetation (ibid).

ii. Palaeontological context



Figure 4: SAHRIS palaeosensitivity map for the site for the proposed Concordia sand mine shown within the yellow rectangle. Background colours indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero.

The palaeontological sensitivity of the area under consideration is presented in Figure 4. The site for mining is in the Quaternary sands and alluvium in the riverbed, possibly sourced from the Gordonia Formation. Since these sands have been transported they would not contain any fossils in primary context. They might have included fragments of more robust fossils such as bones or silicified woods from farther upstream. When and if the river flows the stones, bones and fragments would be tumbled and washed downstream so their occurrence would be very rare and unpredictable. The SAHRIS palaeosensitivity map indicates that the area is of low sensitivity and this is most likely a true reflection as seen by the archaeologist (Figure 4).

The older granites of the Little Namaqualand Suite are of volcanic origin and would not preserve any fossils.

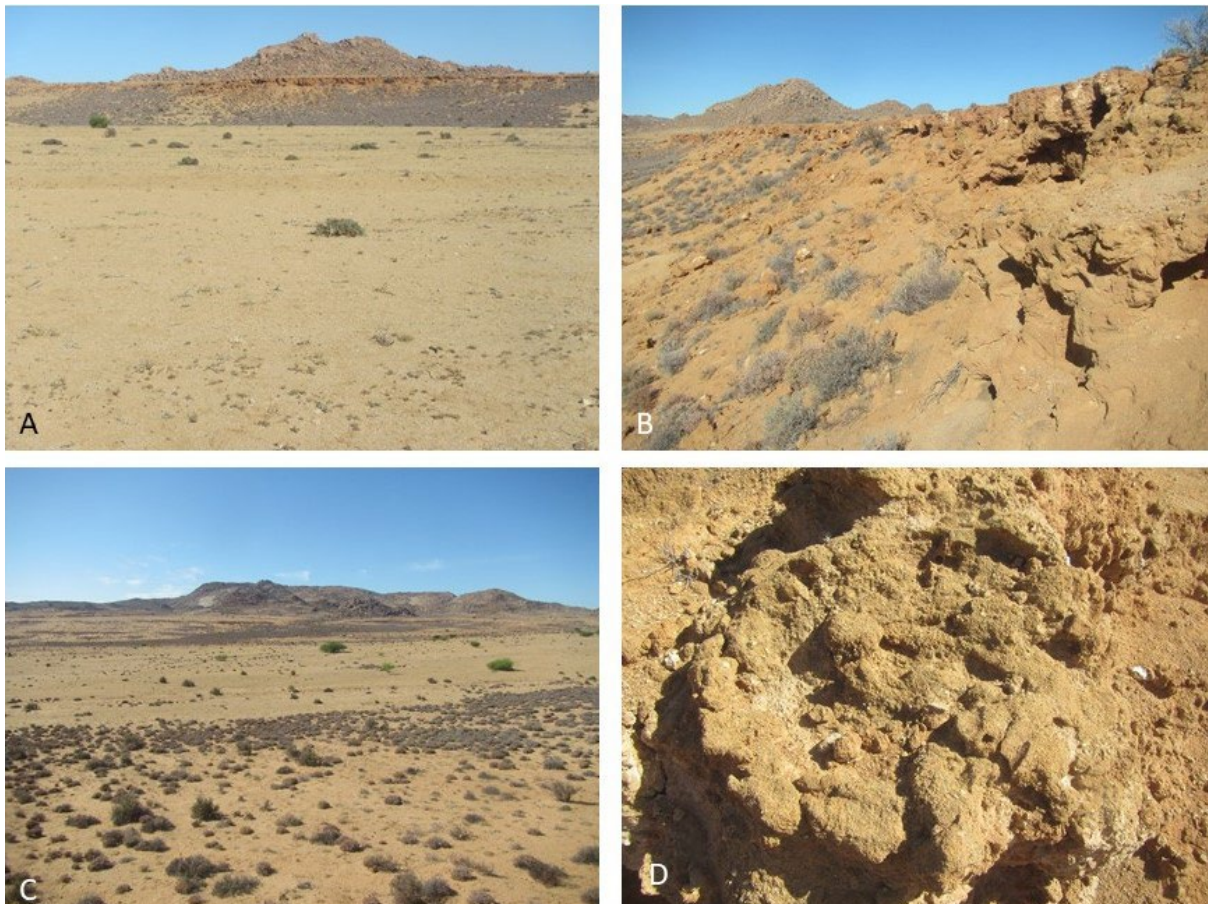


Figure 5: Site photographs taken by the archaeologist (Dr Orton). A - 5047 - looking at the mining area (foreground) and showing a hardpan cliff on the north side. B - hardpan formation that forms the north bank of the river well beyond the mining area C - view across the river channel with mining in the middle area of the photo. D – possible termite tunnels in the hardpan but they may be modern.

4. Impact assessment

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

TABLE 3A: CRITERIA FOR ASSESSING IMPACTS

PART A: DEFINITION AND CRITERIA		
Criteria for ranking of the SEVERITY/NATURE of environmental impacts	H	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.
	M	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.
	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	L+	Minor improvement. Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.
	M+	Moderate improvement. Will be within or better than the recommended level. No observed reaction.
	H+	Substantial improvement. Will be within or better than the recommended level. Favourable publicity.
Criteria for ranking the DURATION of impacts	L	Quickly reversible. Less than the project life. Short term
	M	Reversible over time. Life of the project. Medium term
	H	Permanent. Beyond closure. Long term.
Criteria for ranking the SPATIAL SCALE of impacts	L	Localised - Within the site boundary.
	M	Fairly widespread – Beyond the site boundary. Local
	H	Widespread – Far beyond site boundary. Regional/ national
PROBABILITY (of exposure to impacts)	H	Definite/ Continuous
	M	Possible/ frequent
	L	Unlikely/ seldom

TABLE 3B: IMPACT ASSESSMENT

PART B: ASSESSMENT		
SEVERITY/NATURE	H	-
	M	-
	L	Sands do not preserve fossils but might trap or transport them; so far there are no records from the area of plant or animal fossils in this region so it is very unlikely that fossils occur on the site. The impact would be very negligible.
	L+	-
	M+	-
	H+	-
DURATION	L	-
	M	-
	H	Where manifest, the impact will be permanent.
SPATIAL SCALE	L	Since the only possible fossils within the area would be transported and fragmented in the river sands and gravels, the spatial scale will be localised within the site boundary.
	M	-
	H	-

PART B: ASSESSMENT		
PROBABILITY	H	-
	M	-
	L	It is extremely unlikely that any fossils would be found in the loose sand that will be mined. Nonetheless a Fossil Chance Find Protocol should be added to the eventual EMPr.

Based on the nature of the project, surface activities may impact upon the fossil heritage if preserved in the development footprint. The geological structures suggest that the rocks are much too old to contain fossils and the river sands are transported. Furthermore, the material to be mined is sand and this does not preserve fossils because it is aerobic. Since there is an extremely small chance that fossils from upstream may have been transported into the river may be disturbed, a Fossil Chance Find Protocol has been added to this report. Taking account of the defined criteria, the potential significance of impacts to fossil heritage resources is extremely low.

5. Assumptions and uncertainties

Based on the geology of the area and the palaeontological record as we know it, it can be assumed that the formation and layout of the granites, gneisses, sandstones and sands are typical for the country and do not contain primary fossils. The sands of the Quaternary period would not preserve fossils but might have incorporated transported fragmentary fossils. They would, however, be out of context, very young and of minimal scientific value.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, it is extremely unlikely that any fossils would be preserved in the sands and alluvium of the Quaternary. There is a very small chance that fossils may occur in the adjacent transported sands so a Fossil Chance Find Protocol should be added to the EMPr. If fossils are found by the miners or environmental officer, or other responsible person once mining has commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample. As far as the palaeontology is concerned, the project should be authorised.

7. References

Braun, J., Guillocheau, F., Robin, C., Baby, G., Jelsma, H., 2014. Rapid erosion of the Southern African Plateau as it climbs over a mantle superswell, *Journal of Geophysical Research; Solid Earth* 119, 6093–6112. doi:10.1002/2014JB010998

Cornell, D.H., Thomas, R.J., Moen, H.F.G., Reid, D.L., Moore, J.M., Gibson, R.L., 2006. The Namaqua-Natal Province. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). *The*

Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 325-379.

Netterberg, F., 1969. The interpretation of some basic calcrete types. South African Archaeological Bulletin 24, 117-122.

Partridge, T.C., Botha, G.A., Haddon, I.G., 2006. Cenozoic deposits of the interior. In: Johnson, M.R., Anhaeusser, C.R. and Thomas, R.J., (Eds). The Geology of South Africa. Geological Society of South Africa, Johannesburg / Council for Geoscience, Pretoria. Pp 585-604.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the mining activities begin.

1. The following procedure is only required if fossils are seen on the surface and when mining commences.
2. When excavations begin the sand must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone, wood) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
3. Photographs of similar fossils must be provided to the developer to assist in recognizing the fragments of fossil plants, vertebrates, invertebrates or trace fossils in the shales and mudstones (for example see Figure 6). This information will be built into the EMP's training and awareness plan and procedures.
4. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
5. If there is any possible fossil material found by the developer/environmental officer/miners then the qualified palaeontologist sub-contracted for this project, should visit the site to inspect the selected material and check the dumps where feasible.
6. Fossil plants or vertebrates that are considered to be of good quality or scientific interest by the palaeontologist must be removed, catalogued and housed in a suitable institution where they can be made available for further study. Before the fossils are removed from the site a SAHRA permit must be obtained. Annual reports must be submitted to SAHRA as required by the relevant permits.
7. If no good fossil material is recovered then no site inspections by the palaeontologist will be necessary. A final report by the palaeontologist must be sent to SAHRA once the project has been completed and only if there are fossils.
8. If no fossils are found and the excavations have finished then no further monitoring is required.

Appendix A – Examples of fossils from the Quaternary sands



Figure 6: Selection of transported fossils from Quaternary fluvial and aeolian settings.

Appendix B – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD July 2021

I) Personal details

Surname : **Bamford**
First names : **Marion Kathleen**
Present employment : Professor; Director of the Evolutionary Studies Institute.
Member Management Committee of the NRF/DST Centre of Excellence Palaeosciences, University of the Witwatersrand, Johannesburg, South Africa-
Telephone : +27 11 717 6690
Fax : +27 11 717 6694
Cell : 082 555 6937
E-mail : marion.bamford@wits.ac.za ; marionbamford12@gmail.com

ii) Academic qualifications

Tertiary Education: All at the University of the Witwatersrand:

1980-1982: BSc, majors in Botany and Microbiology. Graduated April 1983.

1983: BSc Honours, Botany and Palaeobotany. Graduated April 1984.

1984-1986: MSc in Palaeobotany. Graduated with Distinction, November 1986.

1986-1989: PhD in Palaeobotany. Graduated in June 1990.

iii) Professional qualifications

Wood Anatomy Training (overseas as nothing was available in South Africa):

1994 - Service d'Anatomie des Bois, Musée Royal de l'Afrique Centrale, Tervuren, Belgium, by Roger Dechamps

1997 - Université Pierre et Marie Curie, Paris, France, by Dr Jean-Claude Koeniguer

1997 - Université Claude Bernard, Lyon, France by Prof Georges Barale, Dr Jean-Pierre Gros, and Dr Marc Philippe

iv) Membership of professional bodies/associations

Palaeontological Society of Southern Africa

Royal Society of Southern Africa - Fellow: 2006 onwards

Academy of Sciences of South Africa - Member: Oct 2014 onwards

International Association of Wood Anatomists - First enrolled: January 1991

International Organization of Palaeobotany – 1993+

Botanical Society of South Africa

South African Committee on Stratigraphy – Biostratigraphy - 1997 - 2016

SASQUA (South African Society for Quaternary Research) – 1997+

PAGES - 2008 –onwards: South African representative

ROCEEH / WAVE – 2008+

INQUA – PALCOMM – 2011+onwards

vii) Supervision of Higher Degrees

All at Wits University

Degree	Graduated/completed	Current
Honours	11	0
Masters	10	4
PhD	11	4
Postdoctoral fellows	10	5

viii) Undergraduate teaching

Geology II – Palaeobotany GEOL2008 – average 65 students per year

Biology III – Palaeobotany APES3029 – average 25 students per year

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

Micropalaeontology – average 2-8 students per year.

ix) Editing and reviewing

Editor: *Palaeontologia africana*: 2003 to 2013; 2014 – Assistant editor

Guest Editor: *Quaternary International*: 2005 volume

Member of Board of Review: Review of Palaeobotany and Palynology: 2010 –

Review of manuscripts for ISI-listed journals: 25 local and international journals

x) Palaeontological Impact Assessments

Selected – list not complete:

- Thukela Biosphere Conservancy 1996; 2002 for DWAF
- Vioolsdrift 2007 for Xibula Exploration
- Rietfontein 2009 for Zitholele Consulting
- Bloeddrift-Baken 2010 for TransHex
- New Kleinfontein Gold Mine 2012 for Prime Resources (Pty) Ltd.
- Thabazimbi Iron Cave 2012 for Professional Grave Solutions (Pty) Ltd
- Delmas 2013 for Jones and Wagener
- Klipfontein 2013 for Jones and Wagener
- Platinum mine 2013 for Lonmin
- Syferfontein 2014 for Digby Wells
- Canyon Springs 2014 for Prime Resources
- Kimberley Eskom 2014 for Landscape Dynamics
- Yzermyne 2014 for Digby Wells
- Matimba 2015 for Royal HaskoningDV
- Commissiekraal 2015 for SLR
- Harmony PV 2015 for Savannah Environmental
- Glencore-Tweefontein 2015 for Digby Wells
- Umkomazi 2015 for JLB Consulting
- Ixia coal 2016 for Digby Wells
- Lambda Eskom for Digby Wells
- Alexander Scoping for SLR
- Perseus-Kronos-Aries Eskom 2016 for NGT
- Mala Mala 2017 for Henwood
- Modimolle 2017 for Green Vision
- Klipoortjie and Finaalspan 2017 for Delta BEC
- Ledjadja borrow pits 2018 for Digby Wells
- Lungile poultry farm 2018 for CTS
- Olienhout Dam 2018 for JP Celliers
- Isondlo and Kwasobabili 2018 for GCS
- Kanakies Gypsum 2018 for Cabanga
- NababEEP Copper mine 2018
- Glencore-Mbali pipeline 2018 for Digby Wells
- Remhoogte PR 2019 for A&HAS
- Bospoort Agriculture 2019 for Kudzala
- Overlooked Quarry 2019 for Cabanga
- Richards Bay Powerline 2019 for NGT
- Eilandia dam 2019 for ACO

- Eastlands Residential 2019 for HCAC
- Fairview MR 2019 for Cabanga
- Graspan project 2019 for HCAC
- Lielifontein N&D 2019 for EnviroPro
- Skeerpoort Farm Mast 2020 for HCAC
- Vulindlela Eco village 2020 for 1World
- KwaZamakhule Township 2020 for Kudzala
- Sunset Copper 2020 for Digby Wells
- McCarthy-Salene 2020 for Prescali
- VLNR Lodge 2020 for HCAC
- Madadeni mixed use 2020 for EnviroPro
- Frankfort-Windfield Eskom Powerline 2020 for 1World
- Beaufort West PV Facility 2021 for ACO Associates
- Copper Sunset MR 2021 for Digby Wells
- Sannaspos PV facility 2021 for CTS Heritage
- Smithfield-Rouxville-Zastron PL 2021 for TheroServe

xi) Research Output

Publications by M K Bamford up to July 2021 peer-reviewed journals or scholarly books:
over 150 articles published; 5 submitted/in press; 10 book chapters.

Scopus h-index = 30; Google scholar h-index = 35; -i10-index = 92

Conferences: numerous presentations at local and international conferences.

xii) NRF Rating

NRF Rating: B-1 (2022-2026)

NRF Rating: B-2 (2016-2021)

NRF Rating: B-3 (2005-2015)

NRF Rating: C-2 (1999-2004)