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PALAEONTOLOGICAL DESKTOP ASSESSMENT FOR THE PROPOSED N'KOMATI ANTHRACITE MINE EXTENSION, IN THE BARBERTON MAGISTERIAL DISTRICT, MPUMALANGA PROVINCE

Issue Date:9 December 2021Revision No.:v0.1Client:SENTULA MINING LIMITEDPGS Project No:568HIA – N'komati Anthracite



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#### **Declaration of Independence**

I, Elize Butler, declare that -

General declaration:

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

# **Disclosure of Vested Interest**

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

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SIGNATURE:



#### ACKNOWLEDGMENT OF RECEIPT

| Report Title | Palaeontological Desktop Assessment for the Proposed N'komati<br>Anthracite Opencast Mine Extension, in the Barberton Magisterial<br>District, Mpumalanga Province |           |  |
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CLIENT:

This Palaeontological Desktop 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.

| Requirements of Appendix 6 – GN R326 EIA                                     | Delevent exciten in report | Comment<br>where not  |
|--|----------------------------|-----------------------|
| Regulations of 7 April 2017  | Relevant section in report | applicable.           |
| 1.(1) (a) (i) Details of the specialist who prepared                         | Page ii and Section 2 of   | -                     |
| the report   | Report – Contact details   |                       |
|  | and company and Appendix   |                       |
|  | A                          |                       |
| (ii) The expertise of that person to compile a                               | Section 2 – refer to       | -                     |
| specialist report including a curriculum vitae                               | Appendix A                 |                       |
| (b) A declaration that the person is independent                             |                            | -                     |
| in a form as may be specified by the   | Page ii of the report      |                       |
| competent authority  |                            |                       |
| (c) An indication of the scope of, and the purpose                           | Section 4 – Objective      | -                     |
| for which, the report was prepared   |                            |                       |
| (cA) An indication of the quality and age of base                            | Section 5 – Geological and | -                     |
| data used for the specialist report  | Palaeontological history   |                       |
| (cB) a description of existing impacts on the site,                          |                            | -                     |
| cumulative impacts of the proposed   | Section 9                  |                       |
| development and levels of acceptable   |                            |                       |
| change;<br>(d) The duration, date and season of the site                     |                            | Dealstan              |
| investigation and the relevance of the season                                |                            | Desktop<br>Assessment |
| to the outcome of the assessment   |                            | Assessment            |
| (e) a description of the methodology adopted in                              |                            | -                     |
| preparing the report or carrying out the                                     |                            | -                     |
| specialised process inclusive of equipment                                   | Section 7 Approach and     |                       |
| and modelling used   | Methodology                |                       |
| (f) details of an assessment of the specific                                 |                            |                       |
| identified sensitivity of the site related to the                            |                            |                       |
| proposed activity or activities and its                                      |                            |                       |
| associated structures and infrastructure,                                    |                            |                       |
| inclusive of a site plan identifying site                                    |                            |                       |
| alternatives;  | Section 1 and 10           |                       |
|  |                            | No buffers or         |
|  |                            | areas of              |
| (g) An identification of any areas to be avoided,                            |                            | sensitivity           |
| including buffers  | Section 5                  | identified            |
| (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                                     | Section 5 – Geological and |                       |
| buffers;   | Palaeontological history   |                       |
| (i) A description of any assumptions made and                                | Section 7.1 – Assumptions  | -                     |
| any uncertainties or gaps in knowledge;                                      | and Limitation             |                       |
| (j) A description of the findings and potential                              |                            |                       |
| implications of such findings on the impact of                               | Section 1 and 10           |                       |
| the proposed activity, including identified alternatives, on the environment |                            |                       |
| (k) Any mitigation measures for inclusion in the                             |                            |                       |
| EMPr   | Section 1 and 10           |                       |
| (I) Any conditions for inclusion in the                                      |                            |                       |
| environmental authorisation  | Section 1 and 10           |                       |
| chillionnichtal authonsauon  |                            | 1                     |

| Requirements of Appendix 6 – GN R326 EIA<br>Regulations of 7 April 2017  | Relevant section in report                    | Comment<br>where not<br>applicable.   |
|--|---|---|
| (m) Any monitoring requirements for inclusion in   |   |   |
| the EMPr or environmental authorisation  | Section 1 and 10                              |   |
| <ul> <li>(n)(i) A reasoned opinion as to whether the<br/>proposed activity, activities or portions thereof<br/>should be authorised and</li> </ul>   | Section 1 and 10                              |   |
| <ul> <li>(n)(iA) A reasoned opinion regarding the<br/>acceptability of the proposed activity or<br/>activities; and</li> </ul>   |   |   |
| <ul> <li>(n)(ii) If the opinion is that the proposed activity,<br/>activities or portions thereof should be<br/>authorised, any avoidance, management<br/>and mitigation measures that should be<br/>included in the EMPr, and where<br/>applicable, the closure plan</li> </ul> | Section 1 and 10                              | -   |
| (o) A description of any consultation process<br>that was undertaken during the course of<br>carrying out the study  | N/A   | Not<br>applicable. A<br>public<br>consultation<br>process will<br>be conducted<br>as part of the<br>EIA and<br>EMPr<br>process. |
| (p) A summary and copies if any comments that<br>were received during any consultation<br>process  | N/A   |   |
| (q) Any other information requested by the competent authority.  | N/A   | Not<br>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<br>SAHRA guidelines |   |

#### **EXECUTIVE SUMMARY**

Banzai Environmental was appointed by PGS Heritage (Pty) Ltd to conduct the Palaeontological Desktop Assessment (PDA) to assess the N'komati Anthracite Mine Extension, in the Barberton Magisterial District, Mpumalanga Province. To comply with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), PDA (part of the Heritage Impact Assessment (HIA)) is necessary to confirm if fossil material is present in the planned development and to evaluate the impact of the proposed development on the Palaeontological Heritage.

The N'komati Anthracite Mine Extension is underlain by sediments of the Undifferentiated Karoo. According to the PalaeoMap of South African Heritage Resources Information System (SAHRIS) the Palaeontological Sensitivity of the Undifferentiated Karoo is Very High.

Almost the whole southern portion of the proposed mine extension has been assessed in 2020 and no fossiliferous outcrops were found. However, the northern portion of the proposed mine extension has not been assessed previously. The HIA for this project indicates that there are no outcrops in the proposed mining area. It is thus recommended that an Environmental Impacts Assessment (EIA) level palaeontology report of the unassessed study areas is conducted when excavation has started and is approximately 1-1.5 m deep. This study will assess the value and prominence of fossils in the development area and the effect of the proposed development on the palaeontological heritage. The purpose of the EIA Report is to elaborate on the issues and potential impacts identified during the scoping phase. A Phase 1 field-based assessment would be conducted with research in the site-specific study area, as well as a comprehensive assessment of the impacts identified during the scoping phase.

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# Appendix A: CV

#### TERMINOLOGY AND ABBREVIATIONS

#### Archaeological resources

This includes:

- material remains resulting from human activity which are in a state of disuse and are in or on land and which are older than 100 years including artifacts, human and hominid remains, and artificial features and structures.
- rock art is any form of painting, engraving or other graphic representation on a fixed rock surface or loose rock or stone, which was executed by human agency and which is older than 100 years, including any area within 10m of such representation;
- wrecks, being any vessel or aircraft, or any part thereof, which was wrecked in South Africa, whether on land, in the internal waters, the territorial waters or in the maritime culture zone of the Republic as defined in the Maritimes Zones Act, and any cargo, debris or artefacts found or associated therewith, which is older than 60 years or which SAHRA considers to be worthy of conservation.
- features, structures, and artifacts associated with a military history which are older than 75 years and the site on which they are found.

#### Cultural significance

This means aesthetic, architectural, historical, scientific, social, spiritual, linguistic or technological value or significance

# Development

This means any physical intervention, excavation, or action, other than those caused by natural forces, which may in the opinion of the heritage authority in any way result in a change to the nature, appearance or physical nature of a place or influences its stability and future well-being, including:

- construction, alteration, demolition, removal or change in use of a place or a structure at a place.
- carrying out any works on or over or under a place.
- subdivision or consolidation of land comprising a place, including the structures or airspace of a place.
- constructing or putting up for display signs or boards.
- any change to the natural or existing condition or topography of land; and
- any removal or destruction of trees, or removal of vegetation or topsoil

#### Fossil

Mineralized bones of animals, shellfish, plants, and marine animals. A trace fossil is the track or footprint of a fossil animal that is preserved in stone or consolidated sediment.

#### Heritage

That which is inherited and forms part of the National Estate (historical places, objects, fossils as defined by the National Heritage Resources Act 25 of 1999).

#### Heritage resources

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

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

#### Holocene

The most recent geological time period which commenced 10 000 years ago.

#### Palaeontology

Any fossilised remains or fossil trace of animals or plants which lived in the geological past, other than fossil fuels or fossiliferous rock intended for industrial use, and any site which contains such fossilised remains or trace.

| Abbreviations    | Description                                      |
|------------------|--|
| CRM              | Cultural Resource Management                     |
| DEFF             | Department of Environment Forestry and Fisheries |
| DIA              | Desktop Impact Assessment                        |
| ECO              | Environmental Control Officer                    |
| EIA practitioner | Environmental Impact Assessment Practitioner     |
| EIA              | Environmental Impact Assessment                  |
| GPS              | Global Positioning System                        |
| HIA              | Heritage Impact Assessment                       |
| I&AP             | Interested & Affected Party                      |
| LOM              | Life of Mine                                     |
| NEMA             | National Environmental Management Act            |
| NHRA             | National Heritage Resources Act                  |
| PDA              | Palaeontological Desctop Assessment              |
| PIA              | Palaeontological Impact Assessment               |
| RoM              | Run of Mine                                      |
| PHRA             | Provincial Heritage Resources Authority          |
| PSSA             | Palaeontological Society of South Africa         |
| SAHRA            | South African Heritage Resources Agency          |

#### **1** INTRODUCTION

#### **1.1 Background to the project**

Nkomati Anthracite Mine is situated approximately 52 km south of Komatipoort, 2km east of Sikhwahlane and 10 km southeast of the town Mzinti. Several areas have been identified for the mining extension that includes Block L, Madadeni 20 Ha extension as well as an area between Madadeni and the Komati River for future development (**Figure 4-3**).

#### 1.2 Background

Nkomati Anthracite Mine currently utilises opencast mining methods at the Madadeni Mining Area, through the truck and shovel mining technique while also abstracts anthracite from the underground mining at the Mangweni Mining Area, through the conventional bord-and-pillar underground mining method. The mine is planning to undertake the required regulatory approval process to continue openpit mining in various identified areas i.e., Block L, Madadeni 20 Ha extension as well as a larger area between Madadeni and the Komati River for future development<sup>1</sup>.

All Run of Mine (RoM) products abstracted from the mining areas are transported via trucks to the processing plant where the anthracite is washed, stockpiled and collected by the consumers. The mining and associated surface activities occur on a number of farms including Grobler 479 JU; Guillame 480 JU; Wildebeest 494 JU; Rusplek 495 JU; Sweet Home 496 JU; Bonniue Vale 497 JU; Excelsior 498 JU; Murray 502 JU; Fig Tree 503 JU; Beginsel 504 JU and portions of un-surveyed state land that are under the jurisdiction of three Tribal Authorities namely the Mawewe, Matsamo and Kwalugedlane Tribal Authorities<sup>1</sup>.

The mine has an existing mining right (MP30/5/1/2/2/89MR) issued under Section 22 and 39 of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) (MPRDA) to mine coal on portions of unsurveyed land in close proximity to Madadeni, Sibange and eMangweni Communities<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup>Information provided by N'komati Anthracite

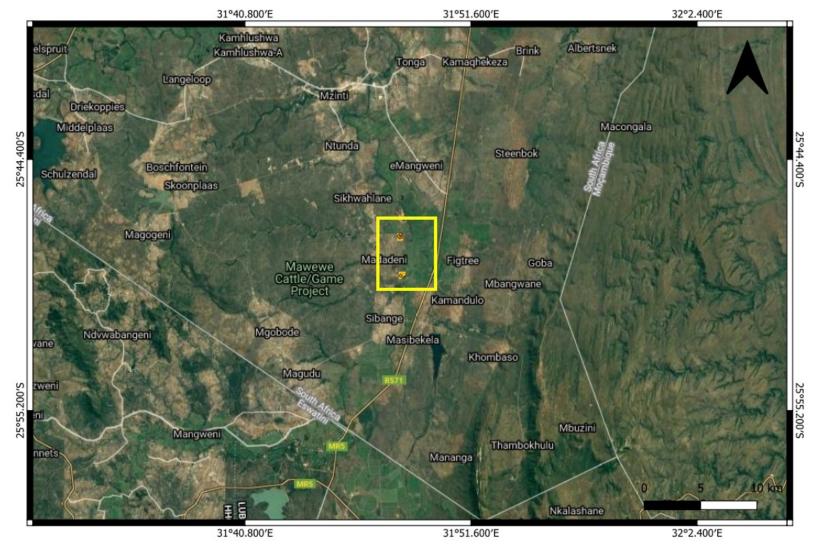


Figure 1: Regional Locality of the proposed Mine expansion

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

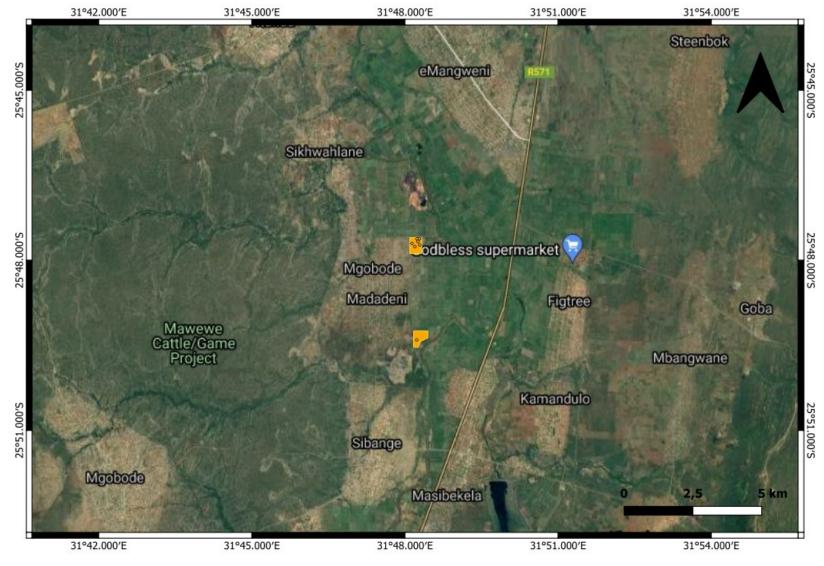


Figure 2: Locality of the proposed Mine expansion.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

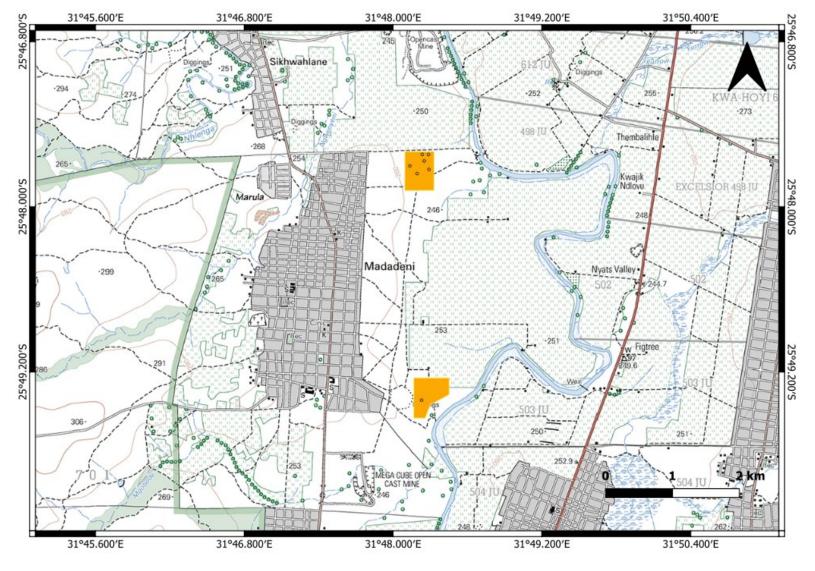


Figure 3: Map Locality.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

#### 1.3 **Previous studies**

The author (E.Butler) has conducted a previous Phase 1 Impact assessment for the Nkomati Anthracite Mine in 2020 (Figure 4).

Butler, E., 2020. Phase 1: PIA for the Proposed N'komati Anthracite Opencast Mine Extension, in the Barberton Magisterial District, Mpumalanga Province.

This study found that the Mandeni Opencast Northern Extension is underlain by sediments of the Undifferentiated Karoo. According to the PalaeoMap of SAHRIS, the Palaeontological Sensitivity of the Undifferentiated Karoo is Very High.

A one-day site specific field survey of the proposed Madadeni Opencast Northern Extension footprint was conducted in August 2020, and no visible evidence of fossiliferous outcrops was found. It was found that the project would not lead to detrimental impacts on the palaeontological resources of the area, and a Chance Find Protocol was included in the report.

The locality of the 2020 study (study area indicated in white) and the present study (indicated in red) is depicted in Figure 4. A large portion of the current development area (2021, southern portion) has been investigated in 2020.

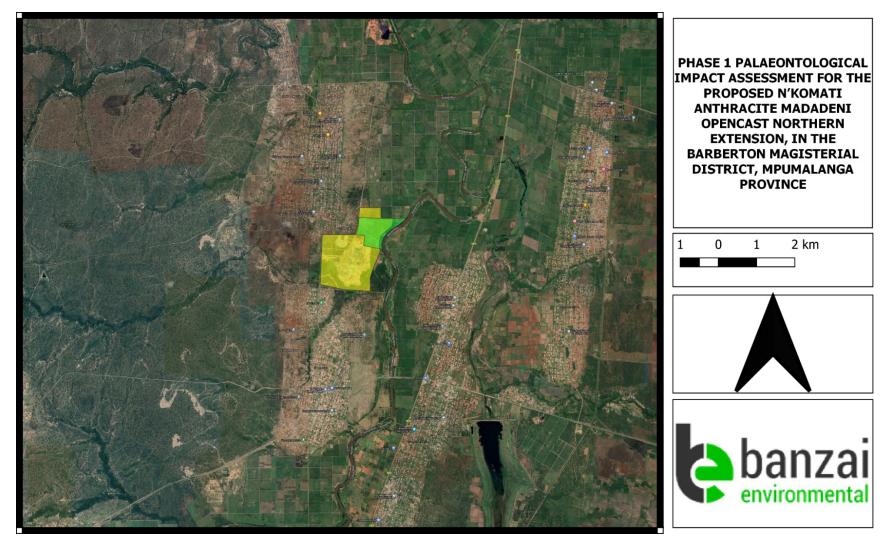


Figure 4: 2020 Study: Google Earth Image (2020) indicating the locality of the N'komati Anthracite mine (indicated in yellow). The proposed extension area is indicated in green.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province



Figure 5: Comparison of current Desktop Study (indicated in yellow) and previous Palaeontological Impact Assessment (indicated in white) conducted in 2020.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province 7 March 2022

#### 2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This present study has been conducted by Mrs. Elize Butler. She has conducted approximately 300 PIA's for developments in the Free State, KwaZulu-Natal, Eastern, Central, and Northern Cape, Northwest, Gauteng, Limpopo, and Mpumalanga. She has an MSc (*cum laude*) in Zoology (specializing in Palaeontology) from the University of the Free State, South Africa and has been working in Palaeontology for more than twenty-five years. She has experience in locating, collecting and curating fossils, including exploration field trips in search of new localities in the Karoo Basin. She has been a member of the Palaeontological Society of South Africa (PSSA) since 2006 and has been conducting PIAs since 2014.

#### 3 LEGISLATION

#### 3.1 National Heritage Resources Act (25 Of 1999)

Cultural Heritage in South Africa, including 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
- 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 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 PDA forms part of the HIA and adhere to the conditions of the Act. According to **Section 38 (1)**, a 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 forms 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 m<sup>2</sup> 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 m<sup>2</sup> in extent.
- or any other category of development provided for in regulations SAHRA or a Provincial heritage resources authority

#### 4 OBJECTIVE

The aim of a PIA is to decrease the effect of the development on potential fossils at the development site. According to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the purpose of the PIA are: 1) to **identify** the palaeontological importance of the rock formations in the footprint; 2) to evaluate the palaeontological magnitude of the formations; 3) to determine the **impact** on fossil heritage; and 4) to **recommend** how the property developer should guard against and lessen damage to fossil heritage.

The terms of reference of a PIA are as follows:

## General Requirements:

- Adherence to the content requirements for specialist reports in accordance with Appendix
   6 of the EIA Regulations 2014, as amended.
- Adherence to all applicable best practice recommendations, appropriate legislation and authority requirements.
- Submit a comprehensive overview of all appropriate legislation, guidelines.
- Description of the proposed project and provide information regarding the developer and consultant who commissioned the study.
- Description and location of the proposed development and provide geological and topographical maps.
- Provide Palaeontological and geological history of the affected area.
- Identification sensitive areas to be avoided (providing shapefiles/kml's) in the proposed development.
- Evaluation of the significance of the planned development during the Pre-construction, Construction, Operation, Decommissioning Phases and Cumulative impacts. Potential impacts should be rated in terms of the direct, indirect and cumulative:
  - a. **Direct impacts** are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
  - b. **Indirect impacts** of an activity are indirect or induced changes that may occur as a result of the activity.
  - **c. Cumulative impacts** result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided):
- Recommend mitigation measures to minimise the impact of the proposed development; and
- Implications of specialist findings for the proposed development (such as permits, licenses etc).

#### 5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The geology of the proposed development is indicated on the 1: 250 000 2530 Barberton Map (Council of Geoscience). The proposed N'komati Anthracite Madedeni Opencast Extension is underlain by sandstones and shales of the undifferentiated Permian-Triassic Karoo Supergroup (**Figure 6**). These rocks are undifferentiated as no Glossopteris flora or vertebrate fossils have been recovered from these sediments. If specimens are found in the sediments, they would be used to identify the specific strata from which they are recovered, similar to what was done in the Main Karoo Basin (Hancox et al., 2001; Rubidge et al., 1995; Johnson et al., 2006).

The N'komati Anthracite Mine proposed Madadeni Opencast extension in Mpumalanga is situated in the Kangwane Coalfield. This Coalfield is approximately 210,000 ha in extent and extends from near Komatipoort in the north, to the Mananga Border Post (eSwatini border) in the south (Hancox *et al.*, 2014).

The area is extensively weathered and covered by recent alluvial and fluvial sediments and thus representative outcrops of the Karoo Supergroup rocks are rare. In the Kangwane Coalfield the Karoo Supergroup succession consists of the Dwyka Group at the bottom, which are occasionally absent in places, followed by the Vryheid and Volksrust formations of the Ecca Group. Locally, equivalents of the Beaufort and Stormberg Group may occur. The succession is covered by the Lebombo Group volcanic formations, which are the temporal equivalent of the Drakensberg Group formations in the Main Karoo Basin (Hancox *et al.*, 2014). Coal seams that can be utilized for mining are present in the fine- to coarse-grained sandstones and subordinate mudstones and siltstones of the Vryheid Formation. The Vryheid Formation overlies Archaean basement granites or diamictites of the Dwyka Group unconformably.

The Vryheid Formation is known to contain a rich assemblage of Glossopteris flora which is the source vegetation for the Vryheid Formation. Gymnospermous glossopterids dominated the peat and non-peat accumulating of Permian wetlands after continental deglaciation took place (Falcon, 1986c, Greb *et al.*, 2006).

Recent palaeobotanical studies include that of Adendorff (2005), Bordy and Prevec (2008) and Prevec *et al.* (2008, 2009, 2010) and Prevec, (2011). 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.

In the past, palynological studies have focused on the coal-bearing successions of the Vryheid Formation and include articles by Aitken (1993, 1994, 1998), and Millsteed (1994, 1999), while recent studies were conducted by Götz and Ruckwied, (2014).

Bamford (2011) is of the opinion that only a small amount of data have been published on these potentially fossiliferous deposits and that most likely good material is present around coal mines while in other areas the exposures are poor and of little interest. When plant fossils do occur they are usually abundant. According to Bamford, it is not feasible to preserve all the sites but in the interests of science these sites ought to be well documented, researched and the collected fossils must be housed in an accredited institution.

To date no fossil vertebrates have been collected from the Vryheid formation. The occurrence of fossil insects is rare, while palynomorphs are diverse. Non-marine bivalves and fish scales have also been reported from this formation. Trace fossils are abundantly found but the diversity is low. The mesosaurid reptile, *Mesosaurus* has been found in the southern parts of the basin but may also be present in other areas of the Vryheid formation. Regardless of the rare and irregular occurrence of fossils in this biozone, a single fossil may be of scientific importance as many fossil taxa are known from only a single fossil.

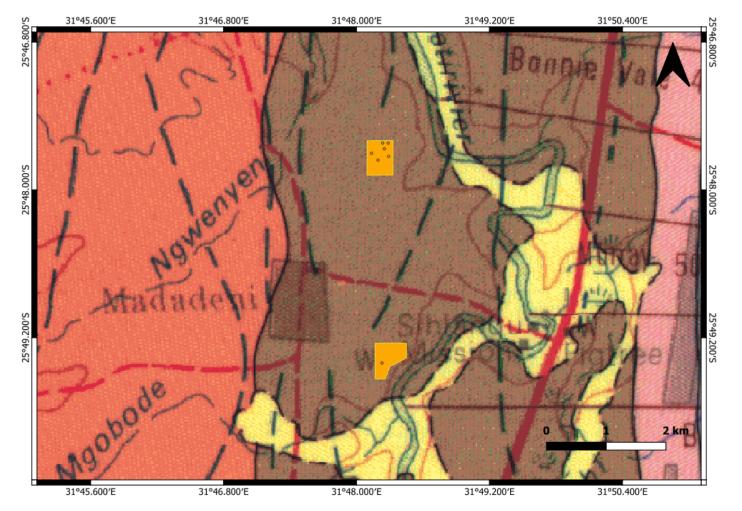
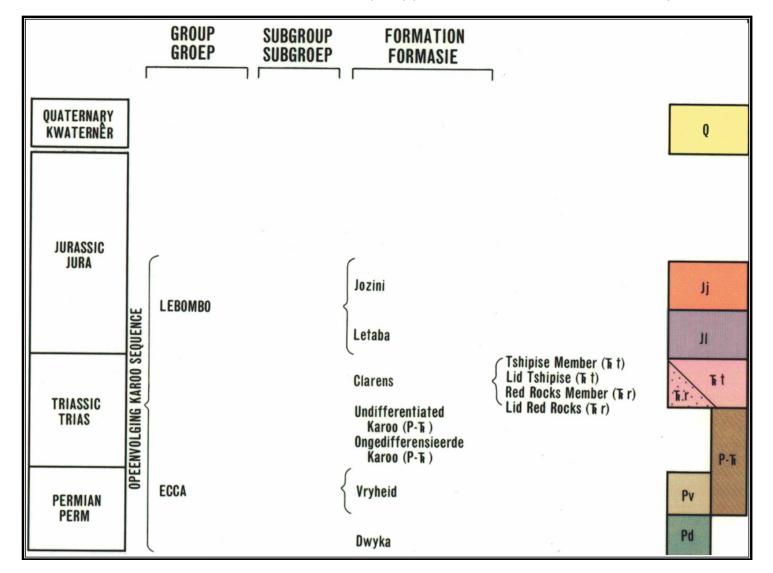


Figure 6: Extract of the 2530 Barberton Map (1986) (Council of Geoscience, Pretoria) indicating the surface geology of the N'komati Opencast Extension, in the Barberton Magisterial District, Mpumalanga Province. The proposed development is underlain by sandstones and shales of the undifferentiated Permian-Triassic Karoo Supergroup.



LEGEND OF THE 2530 BARBERTON MAP (1986) (COUNCIL OF GEOSCIENCE, PRETORIA)

#### Table 3: Geology of development as well as surrounding areas.

Sediments present in the development is indicated in bold. Abbreviations from 2530 Barberton Map (1986) (Council of Geoscience, Pretoria)

| Abbreviation      | Group/Formation (Fm)                   | Lithology                      |
|-------------------|--|--------------------------------|
| Q                 | Cenozoic Superficial deposits          | Surface deposits, alluvium,    |
|                   |  | and scree                      |
| Jj                | Jozini Formation Lebombo Group, Karoo  | Red to light brown, fine       |
|                   | Supergroup                             | grained rhyolitic lava,        |
|                   |  | porphyritic rhyolite, and tuff |
| T- <sub>R</sub> T | Clarence Formation, Karoo Supergroup   | Cream coloured, fine-grained,  |
|                   |  | massive sandstone              |
| P-T <sub>R</sub>  | Undifferentiated Karoo Formation Karoo | Red and white, fine-grained    |
|                   | Supergroup                             | argillaceous sandstone         |
| Pv                | Vryheid Formation, Ecca Group, Karoo   | Quartzitic, cross-bedded       |
|                   | Supergroup                             | sandstone, pebbly near its     |
|                   |  | base, gritty sandstone, shale  |

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

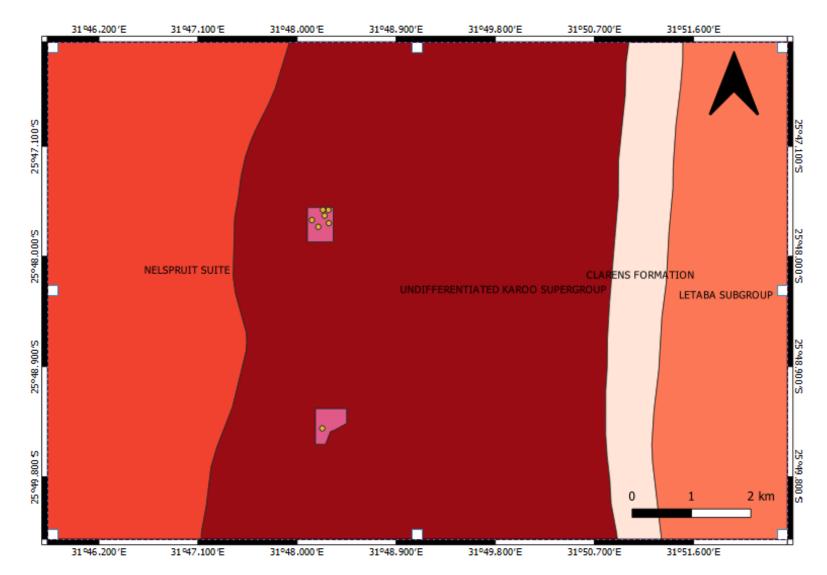


Figure 7: Shape files (Council of Geoscience, Pretoria) indicating the surface geology of the Mining extension. Map drawn by QGIS 2.18.28



Figure 8: Glossopteris leaf.



Figure 9: Mesosaurus sp. National Museum specimen NMQR3536

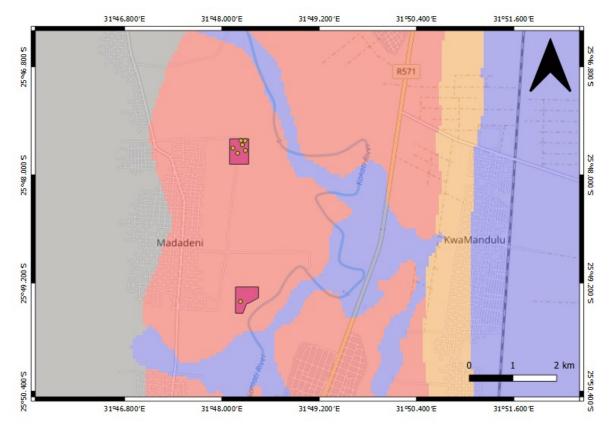


Figure 10: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences) indicating the proposed development in green.

| 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<br>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<br>study. As more information comes to light, sahra<br>will continue to populate the map. |

According to the SAHRIS Palaeosensitivity map (**Figure 10**) the proposed development is underlain by sediments with a Very High (red) Palaeontological Sensitivity. The colours on the PalaeoMap indicate the following degrees of sensitivity: red = very highly sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero

sensitive; orange/yellow = high; green = moderate; blue = low; grey = insignificant/zero

#### **GEOGRAPHICAL LOCATION OF THE SITE** 6

The mining and associated surface activities occur on a number of farms including:

- Grobler 479 JU; Guillame 480 JU. •
- Wildebeest 494 JU. •
- Rusplek 495 JU. •
- Sweet Home 496 JU. ٠
- Bonniue Vale 497 JU. •
- Excelsior 498 JU. •
- Murray 502 JU. ٠
- Fig Tree 503 JU. ٠
- Beginsel 504 JU. •
- And portions of un-surveyed state land that are under the jurisdiction of three Tribal Authorities • namely the Mawewe, Matsamo and Kwalugedlane Tribal Authorities.

Nkomati Anthracite Mine is situated approximately 52 km south of Komatipoort, 2km east of Sikhwahlane and 10 km southeast of the town Mzinti.

| GPS Coordinates               | Latitude     | Longitude   |
|-------------------------------|--------------|-------------|
| Approximate center coordinate | -25.822866°S | 31.804425°E |
| (South)                       |              |             |
| Approximate center coordinate | -25.795611°S | 31.803518°E |
| (North)                       |              |             |

#### Table 5:GPS Coordinates

#### 7 METHODS

A PDA study was undertaken to evaluate the possible risk to palaeontological heritage (this includes fossils as well as trace fossils) in the proposed extension area. In compiling the report aerial photos, Google Earth 2018, topographical and geological maps and other reports from the same area, as well as the author's experience were used to assess the proposed expansion footprint.

#### 7.1 Assumptions and Limitations

The accuracy of desktop assessment is reduced by several factors which may include the following: the databases of institutions are not always up to date and relevant locality and geological information were not accurately documented in the past. Various remote areas of South Africa have not been assessed by palaeontologists and data is based on aerial photographs alone. Geological maps concentre on the geology of an area and the sheet explanations were never intended to focus on palaeontological heritage.

Similar Assemblage Zones, but in different areas is used to provide information on the presence of fossil heritage in an unmapped area. Desktop studies of similar geological formations and Assemblage Zones generally **assume** that exposed fossil heritage is present within the development area. The accuracy of the Palaeontological Impact Assessment is thus improved considerably by conducting a field-assessment.

#### 8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- The Palaeosensitivity Map from the SAHRIS website.
- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- Geological Map 1: 250 000 2530 Barberton (Council for Geoscience).
- A Google Earth map with polygons of the proposed development was obtained from PGS.

#### 9 METHODOLOGY FOR IMPACT ASSESSMENT

The impact significance rating process serves two purposes: firstly, it helps to highlight the critical impacts requiring consideration in the management and approval process; secondly, it shows the primary impact characteristics, as defined above, used to evaluate impact significance.

The impacts will be ranked according to the methodology described below.

The significance of the identified impacts will be determined using an accepted methodology from the Department of Environmental Affairs and Tourism Guideline document on EIA Regulations, April 1998.

As with all impact methodologies, the impact is defined in a semi-quantitative way and will be assessed according to methodology prescribed in the following section.

| Evaluation   | Rating | Scale                      | Description / criteria   |  |  |  |  |  |  |  |
|--|--------|----------------------------|--|--|--|--|--|--|--|--|
| Component  | Rating | Scale                      | Description / criteria   |  |  |  |  |  |  |  |
|  | 10     | Very high                  | Bio-physical and/or social functions and/or processes might be <i>severely</i> altered.                        |  |  |  |  |  |  |  |
|  | 8      | High                       | Bio-physical and/or social functions and/or<br>processes might be <i>considerably</i> altered.                 |  |  |  |  |  |  |  |
| MAGNITUDE of<br>negative impact<br>(at the indicated | 6      | Medium                     | Bio-physical and/or social functions and/or processes might be <i>notably</i> altered.                         |  |  |  |  |  |  |  |
| spatial scale)                                       | 4      | Low                        | Bio-physical and/or social functions and/or processes might be <i>slightly</i> altered.                        |  |  |  |  |  |  |  |
|  | 2      | Very low                   | Bio-physical and/or social functions and/or processes might be <i>negligibly</i> altered.                      |  |  |  |  |  |  |  |
|  | 0      | Zero                       | Bio-physical and/or social functions and/or processes will remain <i>unaltered</i> .                           |  |  |  |  |  |  |  |
|  | 10     | Very high                  | Positive: Bio-physical and/or social functions and/or processes might be <i>substantially</i> enhanced.        |  |  |  |  |  |  |  |
| MAGNITUDE of   | 8      | High                       | <b>Positive</b> : Bio-physical and/or social functions and/or processes might be <i>considerably</i> enhanced. |  |  |  |  |  |  |  |
| POSITIVE<br>IMPACT (at the<br>indicated spatial      | 6      | Medium                     | <b>Positive</b> : Bio-physical and/or social functions and/or processes might be <i>notably</i> enhanced.      |  |  |  |  |  |  |  |
| indicated spatial scale)                             | 4      | Low                        | <b>Positive</b> : Bio-physical and/or social functions and/or processes might be <i>slightly</i> enhanced.     |  |  |  |  |  |  |  |
|  | 2      | Very low                   | <b>Positive</b> : Bio-physical and/or social functions and/or processes might be <i>negligibly</i> enhanced.   |  |  |  |  |  |  |  |
|  | 0      | Zero                       | <b>Positive</b> : Bio-physical and/or social functions and/or processes will remain <i>unaltered</i> .         |  |  |  |  |  |  |  |
|  | 5      | Permanent                  | Impact in perpetuity. –  |  |  |  |  |  |  |  |
|  | 4      | Long term                  | Impact ceases after operational phase/life of the activity > 60 years.   |  |  |  |  |  |  |  |
| DURATION   | 3      | Medium term                | Impact might occur during the operational phase/life of the activity – 60 years.                               |  |  |  |  |  |  |  |
|  | 2      | Short term                 | Impact might occur during the construction phase - < 3 years.  |  |  |  |  |  |  |  |
|  | 1      | Immediate                  | Instant impact.  |  |  |  |  |  |  |  |
|  | 5      | International              | Beyond the National boundaries.  |  |  |  |  |  |  |  |
| EVIENT   | 4      | National                   | Beyond provincial boundaries, but within National boundaries.  |  |  |  |  |  |  |  |
| EXTENT<br>(or spatial<br>scale/influence of          | 3      | Regional                   | Beyond 5 km of the Mothae Diamond Mine and within the provincial boundaries.                                   |  |  |  |  |  |  |  |
| impact)  | 2      | Local                      | Within a 5 km radius of the Mothae Diamond<br>Mine.  |  |  |  |  |  |  |  |
|  | 1      | Site-specific<br>None      | On site or within 100 meters of the site boundaries.<br>Zero extent.   |  |  |  |  |  |  |  |
|  | 5      | Definite                   |  |  |  |  |  |  |  |  |
|  |        |                            | <b>Definite</b> loss of irreplaceable resources.   |  |  |  |  |  |  |  |
| IRREPLACEABLE<br>loss of resources                   | 4      | High potential<br>Moderate | High potential for loss of irreplaceable resources.Moderatepotentialforlossofirreplaceable                     |  |  |  |  |  |  |  |
|  | 2      | potential<br>Low potential | resources.Low potential for loss of irreplaceable resources.   |  |  |  |  |  |  |  |

# 9.1 Scale utilised for the evaluation of the Environmental Risk Ratings

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

| Evaluation                        | Rating  | Scale  | Description / criteria                                   |  |  |  |  |  |  |  |  |
|-----------------------------------|---|--|--|--|--|--|--|--|--|--|--|
| Component                         | J   |  | •  |  |  |  |  |  |  |  |  |
|                                   | 1   | Very low   | Very low potential for loss of irreplaceable             |  |  |  |  |  |  |  |  |
|                                   |   | potential  | resources.   |  |  |  |  |  |  |  |  |
|                                   | 0   | None   | Zero potential.  |  |  |  |  |  |  |  |  |
|                                   | 5   | Irreversible   | Impact <b>cannot</b> be reversed.                        |  |  |  |  |  |  |  |  |
| <b>REVERSIBILITY</b><br>of impact | 4   | Low<br>irreversibility   | Low potential that impact might be reversed.             |  |  |  |  |  |  |  |  |
|                                   | 3   | Moderate<br>reversibility                                      | <b>Moderate</b> potential that impact might be reversed. |  |  |  |  |  |  |  |  |
|                                   | 2   | High reversibility High potential that impact might be reverse |  |  |  |  |  |  |  |  |  |
|                                   | 1   | Reversible   | Impact <b>will be</b> reversible.                        |  |  |  |  |  |  |  |  |
|                                   | 0   | No impact  | No impact.   |  |  |  |  |  |  |  |  |
| PROBABILITY (of                   | 5   | Definite   | >95% chance of the potential impact occurring.           |  |  |  |  |  |  |  |  |
|                                   | 4   | High probability   | 75% - 95% chance of the potential impact occurring.      |  |  |  |  |  |  |  |  |
|                                   | 3   | Medium<br>probability  | 25% - 75% chance of the potential impact occurring       |  |  |  |  |  |  |  |  |
| occurrence)                       | 2   | Low probability  | 5% - 25% chance of the potential impact occurring.       |  |  |  |  |  |  |  |  |
|                                   | 1   | <b>Improbable</b> <5% chance of the potential impact of        |  |  |  |  |  |  |  |  |  |
|                                   | 0   | No probability   | Zero probability.  |  |  |  |  |  |  |  |  |
| Evaluation<br>Component           | Rating  | scale and descript   | ion / criteria   |  |  |  |  |  |  |  |  |
| <b>CUMULATIVE</b><br>impacts      | <ul> <li>High: The activity is one of several similar past, present or future activities in the same geographical area, and might contribute to a very significant combined impact on the natural, cultural, and/or socio-economic resources of local, regional or national concern.</li> <li><i>Medium</i>: The activity is one of a few similar past, present or future activities in the same geographical area, and might have a combined impact of moderate significance on the natural, cultural, and/or socio-economic resources of local, regional or national concern.</li> <li><i>Low</i>: The activity is localised and might have a negligible cumulative impact.</li> <li><i>None</i>: No cumulative impact on the environment.</li> </ul> |  |  |  |  |  |  |  |  |  |  |

Once the Environmental Risk Ratings have been evaluated for each potential environmental impact, the Significance Score of each potential environmental impact is calculated by using the following formula:

# SS (Significance Score) = (magnitude + duration + extent + irreplaceable + reversibility) x probability.

The maximum Significance Score value is 150.

The Significance Score is then used to rate the Environmental Significance of each potential environmental impact as per Table below. The Environmental Significance rating process is completed for all identified potential environmental impacts both before and after the implementation of the recommended mitigation measures.

| Significance<br>Score | Environmental<br>Significance | Description / criteria  |  |  |  |  |
|-----------------------|-------------------------------|---|--|--|--|--|
| 125 – 150             | Very high (VH)                | An impact of very high significance will mean that the project cannot proceed, and that impacts are irreversible, regardless of available mitigation options.   |  |  |  |  |
| 100 – 124             | High (H)                      | An impact of high significance which could influence a decision<br>about whether or not to proceed with the proposed project,<br>regardless of available mitigation options.  |  |  |  |  |
| 75 – 99               | Medium-high<br>(MH)           | If left unmanaged, an impact of medium-high significance could<br>influence a decision about whether or not to proceed with a<br>proposed project. Mitigation options should be relooked at.  |  |  |  |  |
| 40 – 74               | Medium (M)                    | If left unmanaged, an impact of moderate significance could<br>influence a decision about whether or not to proceed with a<br>proposed project.   |  |  |  |  |
| <40                   | Low (L)                       | An impact of low is likely to contribute to positive decisions<br>about whether or not to proceed with the project. It will have little<br>real effect and is unlikely to have an influence on project design<br>or alternative motivation. |  |  |  |  |
| +                     | Positive<br>impact (+)        | A positive impact is likely to result in a positive<br>consequence/effect, and is likely to contribute to positive<br>decisions about whether or not to proceed with the project.   |  |  |  |  |

# The scale used for the evaluation of the Environmental Significance Ratings

## Table 6: Impact Assessment Table

| DEVELOPMENT  | POTENTIAL<br>ENVIRONMENTAL<br>IMPACT | ACTIVITY       | ENVIRONMENTAL SIGNIFICANCE<br>BEFORE MITIGATION |   |     |   |     |     | E  | CUMULATIVE | STATUS | RECOMMENDED<br>MITIGATION | ENVIRONMENTAL SIGNIFICANCE<br>AFTER MITIGATION |   |   |   |     |     |       |    |    |
|--------------|--------------------------------------|----------------|---|---|-----|---|-----|-----|----|------------|--------|---------------------------|--|---|---|---|-----|-----|-------|----|----|
| PHASE        |                                      |                | M D   | S | I R | Ρ | тот | AL  | SS |            |        | MEASURES /<br>REMARKS     | М  | D | S | I | F   | S I | р тот | AL | SS |
| TOPOGRAPHY   |                                      |                |   |   |     |   |     |     |    |            |        |                           |  |   |   |   |     |     |       |    |    |
|              | Loss/destruction of                  | Site Clearing  | 10 5  | 1 | 5 5 | 4 |     | 104 |    |            |        | See Section 10            | 4  | 5 | 1 | Ę | 5 5 | 5   | 2     | 40 |    |
|              | Palaeontological                     | Mining         |   |   |     |   |     |     |    |            |        |                           |  |   |   |   |     |     |       |    |    |
| Construction | Resources                            | Rehabilitation |   |   |     |   |     |     |    |            |        |                           |  |   |   |   |     |     |       |    |    |

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

#### **10 FINDINGS AND RECOMMENDATIONS**

The N'komati Anthracite Mine Extension is underlain by sediments of the Undifferentiated Karoo. According to the PalaeoMap of SAHRIS, the Palaeontological Sensitivity of the Undifferentiated Karoo is Very High.

Almost the whole southern portion of the proposed mine extension has been assessed in 2020 and no fossiliferous outcrops were found. However, the northern portion of the proposed mine extension has not been assessed previously. The HIA for this project indicates that there are no outcrops in the proposed mining area. It is thus recommended that an EIA level palaeontology report of the unassessed study areas is conducted when an excavation has started and is approximately 1-1.5 m deep. This study will assess the value and prominence of fossils in the development area and the effect of the proposed development on the palaeontological heritage. The purpose of the EIA Report is to elaborate on the issues and potential impacts identified during the scoping phase. A Phase 1 field-based assessment would be conducted with research in the site-specific study area, as well as a comprehensive assessment of the impacts identified during the scoping phase.

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## Appendix A – Elize Butler CV

| CURRICULUM VITAE   |                                     |
|--------------------|-------------------------------------|
| ELIZE BUTLER       |                                     |
| PROFESSION:        | Palaeontologist                     |
| YEARS' EXPERIENCE: | 28 years in Palaeontology           |
|                    |                                     |
| EDUCATION:         | B.Sc Botany and Zoology, 1988       |
|                    | University of the Orange Free State |
|                    |                                     |
|                    | B.Sc (Hons) Zoology, 1991           |
|                    | University of the Orange Free State |
|                    |                                     |
|                    | Management Course, 1991             |
|                    | University of the Orange Free State |
|                    |                                     |
|                    | M. Sc. Cum laude (Zoology), 2009    |
|                    | University of the Free State        |
|                    |                                     |

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

| MEMBERSHIP                                      |  |
|---|--|
| Palaeontological Society of South Africa (PSSA) | 2006-currently                             |
| EMPLOYMENT HISTORY                              |  |
| Part time Laboratory assistant                  | Department of Zoology & Entomology         |
|   | University of the Free State Zoology 1989- |
|   | 1992                                       |
| Part time laboratory assistant                  | Department of Virology                     |
|   | University of the Free State Zoology 1992  |
|   |  |
| Research Assistant                              | National Museum, Bloemfontein 1993 – 1997  |
| Principal Research Assistant                    | National Museum, Bloemfontein              |
| and Collection Manager                          | 1998–currently                             |

## **TECHNICAL REPORTS**

Butler, E. 2014. Palaeontological Impact Assessment of the proposed development of private dwellings on portion 5 of farm 304 Matjesfontein Keurboomstrand, Knysna District, Western Cape Province. Bloemfontein.

Butler, E. 2014. Palaeontological Impact Assessment for the proposed upgrade of existing water supply infrastructure at Noupoort, Northern Cape Province. 2014. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed consolidation, re-division and development of 250 serviced erven in Nieu-Bethesda, Camdeboo local municipality, Eastern Cape. Bloemfontein.

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Butler, E. 2015. Palaeontological exemption report of the proposed truck stop development at Palmiet 585, Vrede, Free State. Bloemfontein.

Butler, E. 2015. Palaeontological impact assessment of the proposed Orange Grove 3500 residential development, Buffalo City Metropolitan Municipality East London, Eastern Cape. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Gonubie residential development, Buffalo City Metropolitan Municipality East London, Eastern Cape Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Ficksburg raw water pipeline. Bloemfontein.

Butler, E. 2015. Palaeontological Heritage Impact Assessment report on the establishment of the 65 mw Majuba Solar Photovoltaic facility and associated infrastructure on portion 1, 2 and 6 of the farm Witkoppies 81 HS, Mpumalanga Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed township establishment on the remainder of portion 6 and 7 of the farm Sunnyside 2620, Bloemfontein, Mangaung metropolitan municipality, Free State, Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Woodhouse 1 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse729, near Vryburg, North West Province, Bloemfontein,

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Woodhouse 2 photovoltaic solar energy facilities and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Orkney solar energy farm and associated infrastructure on the remaining extent of Portions 7 and 21 of the farm Wolvehuis 114, near Orkney, North West Province. Bloemfontein.

Butler, E. 2015. Palaeontological Impact Assessment of the proposed Spectra foods broiler houses and abattoir on the farm Maiden Manor 170 and Ashby Manor 171, Lukhanji Municipality, Queenstown, Eastern Cape Province. Bloemfontein.

Butler. E. 2016. Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupoort concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoort, Northern Cape. Prepared for Savannah Environmental. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Woodhouse 1 Photovoltaic Solar Energy facility and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province, Bloemfontein,

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Woodhouse 2 Photovoltaic Solar Energy facility and associated infrastructure on the farm Woodhouse 729, near Vryburg, North West Province, Bloemfontein,

Butler, E. 2016. Proposed 132kV overhead power line and switchyard station for the authorised Solis Power 1 CSP project near Upington, Northern Cape. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of of the proposed Sengu Pedestrian Bridges in Ward 5 of Sengu Local Municipality, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Modderfontein Filling Station on Erf 28 Portion 30, Founders Hill, City Of Johannesburg, Gauteng Province. Bloemfontein.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Modikwa Filling Station on a Portion of Portion 2 of Mooihoek 255 Kt, Greater Tubatse Local Municipality, Limpopo Province. Bloemfontein.

Butler, E. 2016. Recommendation from further Palaeontological Studies: Proposed Construction of the Heidedal filling station on Erf 16603, Heidedal Extension 24, Mangaung Local Municipality, Bloemfontein, Free State Province. Bloemfontein.

Butler, E. 2016. Recommended Exemption from further Palaeontological studies: Proposed Construction of the Gunstfontein Switching Station, 132kv Overhead Power Line (Single Or Double Circuit) and ancillary infrastructure for the Gunstfontein Wind Farm Near Sutherland, Northern Cape Province. Savannah South Africa. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed Galla Hills Quarry on the remainder of the farm Roode Krantz 203, in the Lukhanji Municipality, division of Queenstown, Eastern Cape Province. Bloemfontein.

Butler, E. 2016. Chris Hani District Municipality Cluster 9 water backlog project phases 3a and 3b: Palaeontology inspection at Tsomo WTW. Bloemfontein.

Butler, E. 2016. Palaeontological Impact Assessment of the proposed construction of the 150 MW Noupport concentrated solar power facility and associated infrastructure on portion 1 and 4 of the farm Carolus Poort 167 and the remainder of Farm 207, near Noupoort, Northern Cape. Savannah South Africa. Bloemfontein.

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

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

Butler, E. 2016. Palaeontological Impact Assessment for the proposed construction of up to a 132kv power line and associated infrastructure for the proposed Kalkaar Solar Thermal Power Plant near Kimberley, Free State and Northern Cape Provinces. PGS Heritage. Bloemfontein.

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Butler, E. 2016. Palaeontological impact assessment for the proposed Aggeneys south prospecting right project, Northern Cape Province. Bloemfontein.

Butler, E. 2016. Palaeontological impact assessment of the proposed Motuoane Ladysmith Exploration right application, KwaZulu Natal. Bloemfontein.

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Butler, E. 2017, Palaeontological Impact Assessment Of The Proposed Development Of The New Open Cast Mining Operations On The Remaining Portions Of 6, 7, 8 And 10 Of The Farm Kwaggafontein 8 In The Carolina Magisterial District, Mpumalanga Province. Bloemfontein.

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Butler, E. 2017. Palaeontological Desktop Assessment of the proposed rehabilitation of 5 ownerless asbestos mines. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of the Lephalale coal and power project, Lephalale, Limpopo Province, Republic of South Africa. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of a 132KV powerline from the Tweespruit distribution substation (in the Mantsopa local municipality) to the Driedorp rural substation (within the Naledi local municipality), Free State province. Bloemfontein.

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Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of a Photovoltaic Solar Power station near Collett substation, Middelburg, Eastern Cape. Bloemfontein.

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Butler, E. 2017. Palaeontological Desktop Assessment for the proposed Aroams prospecting right project, without bulk sampling, near Aggeneys, Northern Cape Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed Belvior aggregate quarry II on portion 7 of the farm Maidenhead 169, Enoch Mgijima Municipality, division of Queenstown, Eastern Cape. Bloemfontein.

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Butler, E. 2017. Palaeontological Desktop Assessment of the proposed construction of the Mangaung Gariep Water Augmentation Project. Bloemfontein.

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Butler, E. 2017. Palaeontological Impact Assessment of the proposed construction of the Melkspruit-Rouxville 132KV Power line. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed development of a railway siding on a Portion of portion 41 of the farm Rustfontein 109 is, Govan Mbeki local municipality, Gert Sibande district municipality, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Impact Assessment of the proposed consolidation of the proposed Ilima Colliery in the Albert Luthuli local municipality, Gert Sibande District Municipality, Mpumalanga Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed extension of the Kareerand Tailings Storage Facility, associated borrow pits as well as a storm water drainage channel in the Vaal River near Stilfontein, North West Province. Bloemfontein.

Butler, E. 2017. Palaeontological Desktop Assessment of the proposed construction of a filling station and associated facilities on the Erf 6279, district municipality of John Taolo Gaetsewe District, Ga-Segonyana Local Municipality Northern Cape. Bloemfontein.

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Butler, E. 2017. Palaeontological Desktop Assessment of the proposed Overvaal Trust PV Facility, Buffelspoort, North West Province. Bloemfontein.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

**Butler, E. 2017.** Palaeontological Impact Assessment of the proposed development of the H<sub>2</sub> Energy Power Station and associated infrastructure on Portions 21; 22 And 23 of the farm Hartebeestspruit in the Thembisile Hani Local Municipality, Nkangala District near Kwamhlanga, Mpumalanga Province. Bloemfontein.

**Butler, E. 2017.** Palaeontological Impact Assessment of the proposed upgrade of the Sandriver Canal and Klippan Pump station in Welkom, Free State Province. Bloemfontein.

**Butler, E. 2017.** Palaeontological Impact Assessment of the proposed upgrade of the 132kv and 11kv power line into a dual circuit above ground power line feeding into the Urania substation in Welkom, Free State Province. Bloemfontein.

**Butler, E. 2017.** Palaeontological Desktop Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.

**Butler, E. 2017.** Palaeontological Impact Assessment of the proposed diamonds alluvial & diamonds general prospecting right application near Christiana on the remaining extent of portion 1 of the farm Kaffraria 314, registration division HO, North West Province. Bloemfontein.

**Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Hartebeesfontein, near Panbult, Mpumalanga. Bloemfontein.

**Butler, E. 2017.** Palaeontological Desktop Assessment for the proposed development of Wastewater Treatment Works on Rustplaas near Piet Retief, Mpumalanga. Bloemfontein.

**Butler, E. 2018.** Palaeontological Impact Assessment for the Proposed Landfill Site in Luckhoff, Letsemeng Local Municipality, Xhariep District, Free State. Bloemfontein.

**Butler, E. 2018.** Palaeontological Impact Assessment of the proposed development of the new Mutsho coal-fired power plant and associated infrastructure near Makhado, Limpopo Province. Bloemfontein.

**Butler, E. 2018.** Palaeontological Impact Assessment of the authorisation and amendment processes for Manangu mine near Delmas, Victor Khanye local municipality, Mpumalanga. Bloemfontein.

**Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed Mashishing township establishment in Mashishing (Lydenburg), Mpumalanga Province. Bloemfontein.

**Butler, E. 2018.** Palaeontological Desktop Assessment for the Proposed Mlonzi Estate Development near Lusikisiki, Ngquza Hill Local Municipality, Eastern Cape. Bloemfontein.

**Butler, E. 2018.** Palaeontological Phase 1 Assessment of the proposed Swaziland-Mozambique border patrol road and Mozambique barrier structure. Bloemfontein.

**Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed electricity expansion project and Sekgame Switching Station at the Sishen Mine, Northern Cape Province. Bloemfontein.

**Butler, E. 2018.** Palaeontological field assessment of the proposed construction of the Zonnebloem Switching Station (132/22kV) and two loop-in loop-out power lines (132kV) in the Mpumalanga Province. Bloemfontein.

**Butler, E. 2018.** Palaeontological Field Assessment for the proposed re-alignment and decommissioning of the Firham-Platrand 88kv Powerline, near Standerton, Lekwa Local Municipality, Mpumalanga province. Bloemfontein.

**Butler, E. 2018.** Palaeontological Desktop Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.

**Butler, E. 2018.** Palaeontological field Assessment of the proposed Villa Rosa development In the Buffalo City Metropolitan Municipality, East London. Bloemfontein.

**Butler, E. 2018.** Palaeontological desktop assessment of the proposed Mookodi – Mahikeng 400kV line, North West Province. Bloemfontein.

**Butler, E. 2018.** Palaeontological Desktop Assessment for the proposed Thornhill Housing Project, Ndlambe Municipality, Port Alfred, Eastern Cape Province. Bloemfontein.

**Butler, E. 2018.** Palaeontological desktop assessment of the proposed housing development on portion 237 of farm Hartebeestpoort 328. Bloemfontein.

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

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

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

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

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

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

Butler, E. 2018. Palaeontological Field Assessment of the proposed construction of a new 22 kV single wood pole structure power line to the proposed MTN tower, near Britstown, Northern Cape Province, Bloemfontein,

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

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

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

Butler, E. 2018. Palaeontological Desktop Assessment of the proposed Mookodi – Mahikeng 400kV Line, North West Province. Bloemfontein.

Butler, E. 2018. Environmental Impact Assessment (EIA) for the Proposed 325mw Rondekop Wind Energy Facility between Matijesfontein and Sutherland in the Northern Cape Province.

Butler, E. 2018. Palaeontological Impact Assessment of the proposed construction of the Tooverberg Wind Energy Facility, and associated grid connection near Touws River in the Western Cape Province. Bloemfontein.

Butler, E. 2018. Palaeontological impact assessment of the proposed Kalabasfontein Mining Right Application, near Bethal, Mpumalanga.

Butler, E., 2019. Palaeontological Desktop Assessment of the proposed Westrand Strengthening Project Phase II.

Butler, E., 2019. Palaeontological Field Assessment for the proposed Sirius 3 Photovoltaic Solar Energy Facility near Upington, Northern Cape Province

Butler, E., 2019. Palaeontological Field Assessment for the proposed Sirius 4 Photovoltaic Solar Energy Facility near Upington, Northern Cape Province

Butler, E., 2019. Palaeontological Field Assessment for Heuningspruit PV 1 Solar Energy Facility near Koppies, Ngwathe Local Municipality, Free State Province.

Butler, E., 2019. Palaeontological Field Assessment for the Moeding Solar Grid Connection, North West Province.

Butler, E., 2019. Recommended Exemption from further Palaeontological studies for the Proposed Agricultural Development on Farms 1763, 2372 And 2363, Kakamas South Settlement, Kai! Garib Municipality, Mgcawu District Municipality, Northern Cape Province.

Palaeontological Desktop Assessment for the Proposed Nkomati Anthracite Mine extension, Mpumalanga Province

**Butler, E., 2019.** Recommended Exemption from further Palaeontological studies: of Proposed Agricultural Development, Plot 1178, Kakamas South Settlement, Kai! Garib Municipality

**Butler, E., 2019.** Palaeontological Desktop Assessment for the Proposed Waste Rock Dump Project at Tshipi Borwa Mine, near Hotazel, Northern Cape Province:

**Butler, E., 2019**. Palaeontological Exemption Letter for the proposed DMS Upgrade Project at the Sishen Mine, Gamagara Local Municipality, Northern Cape Province

**Butler, E., 2019.** Palaeontological Desktop Assessment of the proposed Integrated Environmental Authorisation process for the proposed Der Brochen Amendment project, near Groblershoop, Limpopo

Butler, E., **2019.** Palaeontological Desktop Assessment of the proposed updated Environmental Management Programme (EMPr) for the Assmang (Pty) Ltd Black Rock Mining Operations, Hotazel, Northern Cape

**Butler, E., 2019**. Palaeontological Desktop Assessment of the proposed Kriel Power Station Lime Plant Upgrade, Mpumalanga Province

**Butler, E., 2019**. Palaeontological Impact Assessment for the proposed Kangala Extension Project Near Delmas, Mpumalanga Province.

**Butler, E., 2019**. Palaeontological Desktop Assessment for the proposed construction of an iron/steel smelter at the Botshabelo Industrial area within the Mangaung Metropolitan Municipality, Free State Province.

**Butler, E., 2019**. Recommended Exemption from further Palaeontological studies for the proposed agricultural development on farms 1763, 2372 and 2363, Kakamas South settlement, Kai! Garib Municipality, Mgcawu District Municipality, Northern Cape Province.

**Butler, E., 2019.** Recommended Exemption from further Palaeontological Studies for Proposed formalisation of Gamakor and Noodkamp low cost Housing Development, Keimoes, Gordonia Rd, Kai !Garib Local Municipality, ZF Mgcawu District Municipality, Northern Cape Province.

**Butler, E., 2019.** Recommended Exemption from further Palaeontological Studies for proposed formalisation of Blaauwskop Low Cost Housing Development, Kenhardt Road, Kai !Garib Local Municipality, ZF Mgcawu District Municipality, Northern Cape Province.

**Butler, E., 2019**. Palaeontological Desktop Assessment of the proposed mining permit application for the removal of diamonds alluvial and diamonds kimberlite near Windsorton on a certain portion of Farm Zoelen's Laagte 158, Registration Division: Barkly Wes, Northern Cape Province.

**Butler, E., 2019**. Palaeontological Desktop Assessment of the proposed Vedanta Housing Development, Pella Mission 39, Khâi-Ma Local Municipality, Namakwa District Municipality, Northern Cape.

**Butler, E., 2019**. Palaeontological Desktop Assessment for The Proposed 920 KWP Groenheuwel Solar Plant Near Augrabies, Northern Cape Province

**Butler, E., 2019.** Palaeontological Desktop Assessment for the establishment of a Super Fines Storage Facility at Amandelbult Mine, Near Thabazimbi, Limpopo Province

**Butler, E., 2019.** Palaeontological Impact Assessment for the proposed Sace Lifex Project, Near Emalahleni, Mpumalanga Province

**Butler, E., 2019.** Palaeontological Desktop Assessment for the proposed Rehau Fort Jackson Warehouse Extension, East London

**Butler, E., 2019.** Palaeontological Desktop Assessment for the proposed Environmental Authorisation Amendment for moving 3 Km of the Merensky-Kameni 132KV Powerline

**Butler, E., 2019.** Palaeontological Impact Assessment for the proposed Umsobomvu Solar PV Energy Facilities, Northern and Eastern Cape

**Butler, E., 2019.** Palaeontological Desktop Assessment for six proposed Black Mountain Mining Prospecting Right Applications, without Bulk Sampling, in the Northern Cape.

**Butler, E., 2019.** Palaeontological field Assessment of the Filling Station (Rietvlei Extension 6) on the Remaining Portion of Portion 1 of the Farm Witkoppies 393JR east of the Rietvleidam Nature Reserve, City of Tshwane, Gauteng

**Butler, E., 2019.** Palaeontological Desktop Assessment of The Proposed Upgrade Of The Vaal Gamagara Regional Water Supply Scheme: Phase 2 And Groundwater Abstraction

**Butler, E., 2019.** Palaeontological Desktop Assessment of The Expansion of The Jan Kempdorp Cemetery on Portion 43 Of Farm Guldenskat 36-Hn, Northern Cape Province

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