Palaeontological Impact Assessment for the proposed Bushmanland PV project on Remaining Extent of Farm Geel Kop 456, SW of Upington, Northern Cape Province (Project No: Geelkop 1)

Desktop Study (Phase 1)

For

Cape EAPrac and Bushmanland PV (Pty) Ltd

25 March 2020

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Expertise of Specialist

The Palaeontologist Consultant: Prof Marion Bamford Qualifications: PhD (Wits Univ, 1990); FRSSAf, ASSAf Experience: 31 years research; 23 years PIA studies

Declaration of Independence

This report has been compiled by Professor Marion Bamford, of the University of the Witwatersrand, sub-contracted by Cape EAPrac on behalf of Bushmanland PV (Pty) Ltd. 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

Millamford

Signature:

Executive Summary

A palaeontological Impact Assessment was requested for the proposed development of a Photovoltaic facility (PV) on the Remaining Extent of Farm Geel Kop 456, near Upington, Northern Cape Province. To comply with 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 project and is reported herein.

The Bushmanland PV proposed site lies on the volcanic rocks of the Vyfbeker Metamorphic Suite that is non-fossiliferous, but there are overlying layers of sands of the Gordonia Formation (Kalahari Sands) nearby. Nonetheless, a Fossil Chance Find Protocol should be added to the EMPr. Based on this information it is recommended that no palaeontological site visit is required unless fossils are found once excavations for foundations have commenced.

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1. Background

Bushmanland PV (Pty) Ltd have appointed Cape EAPrac to facilitate the Environmental Impact requirements for the proposed Bushmanland PV facility on the Remaining Extent of farm Geel Kop 456, Northern Cape Province. The farm lies on the northern bank of the Orange River, approximately 16 km southwest of Upington and 20 km north of Keimos. It is proposed that the facility will connect from the onsite sub-stations to the Upington MTS (400/132 kV), via the 132kV Geelkop Collector Substation. The Bushmanland PV basic assessment (BA) process only includes the IPP portion of the onsite sub-station, as the remainder of the grid connection is being assessed in a separate BA process.

A Palaeontological Impact Assessment was requested for the Bushmanland PV project in order to comply with 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
с	An indication of the scope of, and the purpose for which, the report was prepared	Section 1
сі	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
е	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	Appendix A
I	Any conditions for inclusion in the environmental authorisation	N/A
m	Any monitoring requirements for inclusion in the EMPr or environmental authorisation	Appendix A
ni	A reasoned opinion as to whether the proposed activity or portions thereof should be authorised	N/A
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	N/A
0	A description of any consultation process that was undertaken during the course of carrying out the study	N/A
р	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
		l

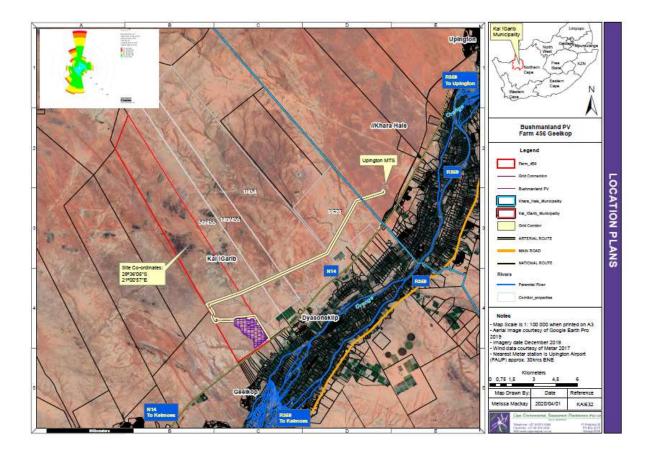


Figure 1: Google Earth map of the proposed Bushmanland PV facility on the Remaining Extent of farm Geel Kop 456, Northern Cape Province. Map supplied by Cape EAPrac.

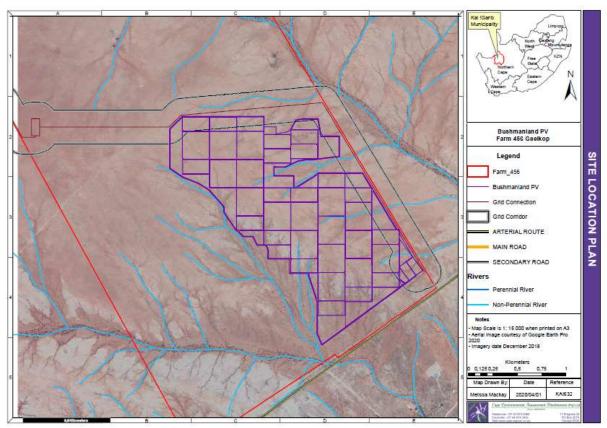


Figure 2: Google Earth map of the proposed Bushmanland PV facility on the Remaining Extent of farm Geel Kop 456, Northern Cape Province. Map supplied by Cape EAPrac.

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:

- 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

The Remaining Extent of farm Geel Kop 456 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 farm lies in the Kakamas Terrane and it has a more or less northwest-southeast extent, bounded on the eastern side by the Boven-Ruzgeer Shear zone and on the western side by the Hartbees River Thrust.

The Namaqua-Natal Province rocks are volcanic in origin and frequently metamorphosed. A large outcrop of the Vyfbeker Metamorphic suite occurs on the southern part of the farm. These rocks are described as mesocratic well-foliated adamelitic granitic gneiss (Cornell et al., 2006).

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).

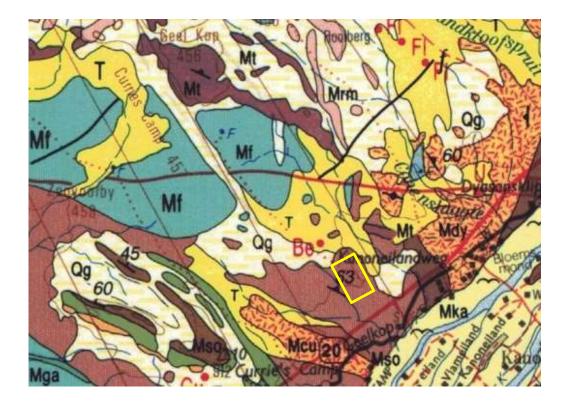


Figure 3: Geological map of the area around the Remaining Extent of Farm Geel Kop 456. The Bushmanland PV is within the yellow rectangle. Abbreviations of the rock types are explained in Table 2. Map enlarged from the Geological Survey 1: 250 000 map 2820 Upington, 1988.

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
Qg	Gordonia Fm, Kalahari	Red-brown wind-blown	Quaternary, ca 2.5 Ma to
Qg	Group	sand and sand dunes	present
Т	Tertiary	Calcrete	Neogene, last 25 Ma
Mf	Friersdale Charnockite,	Charnockite	1200 – 1000 Ma
	Keimos Suite, Kakamas		
	Terrane, Namaqua-Natal		
	Province		
Μv	Vyfbeker Metamorphic	Mesocratic well-foliated	1200 – 1000 Ma
	Suite	adamelitic granite-gneiss	
Mt	Toeslaan Fm, Biesjepoort	Kinzigite gneiss	1200 – 1000 Ma
	Group, Kakamas Terrane,		
	Namaqua-Natal Province		
Mrm	Riemvasmaak Gneiss	Granite-gneiss	1200 – 1000 Ma

ii. Palaeontological context

The palaeontological sensitivity of the area under consideration is presented in Figure 4. The site for development lies on volcanic and metamorphic rocks of the Kakamas Terrane, Namaqua-Natal Province that are dated between 1200 to 1000 Ma. This predates any body fossils, and because of their volcanic origin, they do not preserve any fossils.

The Aeolian sands of the Gordonia Formation do not preserve fossils because they have been transported and reworked, but in some regions they may have covered pan or spring deposits and these can trap fossils, and more frequently archaeological artefacts. Usually these geomorphological features can be detected using satellite imagery. No such features are visible.



Figure 4: SAHRIS palaeosensitivity map for the site of the proposed Bushmanland PV is 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.

From the SAHRIS map above the area is indicated as being moderately sensitive (green) reflecting the Gordonia Formation sands and sand dunes. The volcanic rocks are indicated as having zero or insignificant palaeosensitivity (grey). The site is on the latter.

4. Impact assessment

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

PART A: DEFINITION AND CRITERIA				
	Н	Substantial deterioration (death, illness or injury). Recommended level will often be violated. Vigorous community action.		
	М	Moderate/ measurable deterioration (discomfort). Recommended level will occasionally be violated. Widespread complaints.		
Criteria for ranking of the SEVERITY/NATURE of environmental	L	Minor deterioration (nuisance or minor deterioration). Change not measurable/ will remain in the current range. Recommended level will never be violated. Sporadic complaints.		
impacts	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.		
	L	Quickly reversible. Less than the project life. Short term		
Criteria for ranking the DURATION of impacts	М	Reversible over time. Life of the project. Medium term		
Dentrienten impacto	Н	Permanent. Beyond closure. Long term.		
Criteria for ranking the	L	Localised - Within the site boundary.		
SPATIAL SCALE of	М	Fairly widespread – Beyond the site boundary. Local		
impacts	Н	Widespread – Far beyond site boundary. Regional/ national		
PROBABILITY	Н	Definite/ Continuous		
(of exposure to	М	Possible/ frequent		
impacts)	L	Unlikely/ seldom		

TABLE 3B: IMPACT ASSESSMENT

PART B: ASSESSMENT			
	Н	-	
	М	-	
SEVERITY/NATURE	L	Volcanic rocks do not preserve fossils, Sands of the Gordonia Fm might cover palaeo-pans or palaeo-springs. To date there are no records from this site and none is visible on Google Earth so it is very unlikely that fossils occur on the site. The impact would be very unlikely.	
	L+	-	
	M+	-	
	H+	-	
	L	-	
DURATION	М	-	
	Н	Where manifest, the impact will be permanent.	
SPATIAL SCALE	L	Since only the possible fossils within the area would be fossils from any pans or springs, if present. The spatial scale will be localised within the site boundary.	
	М	-	
	Н	-	

PART B: ASSESSMENT			
	Н	-	
	Μ	-	
PROBABILITY	L	It is extremely unlikely that any fossils would be found in the loose sand or stabilised dunes close to the site. 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 either much too old and of volcanic origin to contain fossils, in this locality, the Vyfbeker Metamorphic suite granitic gneiss. The Gordonia Formation or Kalahari sands do not preserve fossils but might cover palaeo-pans or palaeo-springs, however, none is visible from imagery. Since there is an extremely small chance that fossils might be below the sands, a Fossil Chance Find Protocol has been added to this report. Taking account of the defined criteria, the potential impact 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, Aeolian sands, sand dunes and loose sands are typical for the country and do not contain fossil plant, insect, invertebrate and vertebrate material. The sands of the Quaternary period would not preserve fossils but might cover fossils.

6. Recommendation

Based on experience and the lack of any previously recorded fossils from the area, no fossils occur in the volcanic Vyfbeker Metamorphic Suite. It is extremely unlikely that any fossils would be preserved in the Aeolian sands of the Quaternary Gordonia Formation. There is a very small chance that fossils may occur beneath the sands, if any have been trapped in palaeo-pans or palaeo-dunes, although no such feature is evident. Nonetheless, a Fossil Chance Find Protocol should be added to the EMPr: if fossils are found once excavations have commenced then they should be rescued and a palaeontologist called to assess and collect a representative sample.

7. References

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. 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.

Plumstead, E.P., 1969. Three thousand million years of plant life in Africa. Geological Society of southern Africa, Annexure to Volume LXXII. 72pp + 25 plates.

8. Chance Find Protocol

Monitoring Programme for Palaeontology – to commence once the excavations begin.

- 1. The following procedure is only required if fossils are seen on the surface and when excavations commence.
- 2. When excavations begin the rocks and must be given a cursory inspection by the environmental officer or designated person. Any fossiliferous material (plants, insects, bone, coal) should be put aside in a suitably protected place. This way the project activities will not be interrupted.
- 3. Photographs of similar fossil plants must be provided to the developer to assist in recognizing the fossil plants in the shales and mudstones (for example see Figures 5,6
- This information will be built into the EMP's training and awareness plan and procedures.
- 5. Photographs of the putative fossils can be sent to the palaeontologist for a preliminary assessment.
- 6. 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.
- 7. 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.
- 8. 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.
- 9. If no fossils are found and the excavations have finished then no further monitoring is required.

Appendix A – Examples of fossils from the Quaternary fluvial deposits and pans.



Figure 5: Fossil bones



Figure 6: Silicified wood

Appendix B – Details of specialist

Curriculum vitae (short) - Marion Bamford PhD January 2020

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	7	0
Masters	10	4
PhD	12	5
Postdoctoral fellows	10	3

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 – Cretaceous Research: 2014 – Journal of African Earth Sciences: 2020 -

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
- Lieliefontein N&D 2019 for Enviropro
- •

xi) Research Output

Publications by M K Bamford up to December 2019 peer-reviewed journals or scholarly books: over 140 articles published; 5 submitted/in press; 8 book chapters. Scopus h-index = 27; Google scholar h-index = 32; -i10-index = 80 Conferences: numerous presentations at local and international conferences.

xii) NRF Rating

NRF Rating: B-2 (2016-2020) NRF Rating: B-3 (2010-2015) NRF Rating: B-3 (2005-2009) NRF Rating: C-2 (1999-2004)