



PALAEONTOLOGICAL IMPACT ASSESSMENT FOR THE PROPOSED TOWNSHIP
ESTABLISHMENT ON REMAINDER OF FARM BOTSHABELO
826, ERF K1689 AND ERF K1690 IN BOTSHABELO, MANGAUNG METROPOLITAN
MUNICIPALITY, FREE STATE PROVINCE

Compiled for:

Ngoti Development Consultants

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Prepared by
Banzai Environmental
July 2021

	act Assessment for the p	roposed Township	Establishment or	n Remainder of Fa	rm
Botshabelo	rf K1690 in Botshabelo, N	Januarina Matranal	itan Municipality	Fran Stata Bravina	20

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.
Palaeontolog	ical Impact Assessment for the proposed Township Establishment on Remainder of Farm

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:

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

Table 1 - NEMA Table

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section	where not
Regulations of 7 April 2017	in report	applicable.
	Page ii and	-
	Section 2 of	
	Report - Contact	
	details and	
	company and	
1.(1) (a) (i) Details of the specialist who prepared the report	Appendix A	
(ii) The expertise of that person to compile a specialist	Section 2 - refer	-
report including a curriculum vita	to Appendix A	
(b) A declaration that the person is independent in a	Page ii of the	-
form as may be specified by the competent authority	report	
(c) An indication of the scope of, and the purpose for	Section 4 -	-
which, the report was prepared	Objective	
	Section 5 -	-
	Geological and	
(cA) An indication of the quality and age of base data	Palaeontological	
used for the specialist report	history	
(cB) a description of existing impacts on the site,		-
cumulative impacts of the proposed development	Section 10	
and levels of acceptable change;		
(d) The duration, date and season of the site		
investigation and the relevance of the season to the	Section 1 and 11	
outcome of the assessment		
(e) a description of the methodology adopted in	Section 7	-
preparing the report or carrying out the specialised	Approach and	
process inclusive of equipment 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 11	

Palaeontological Impact Assessment for the proposed Township Establishment on Remainder of Farm Botshabelo

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section	where not
Regulations of 7 April 2017	in report	applicable.
		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	Section 5 -	
associated structures and infrastructure on the	Geological and	
environmental sensitivities of the site including	Palaeontological	
areas to be avoided, including buffers;	history	
arous to no average, merauming pariets,	Section 7.1 -	-
(i) A description of any assumptions made and any	Assumptions	
uncertainties or gaps in knowledge;	and Limitation	
(j) A description of the findings and potential	and Elimitation	
implications of such findings on the impact of the	Section 1 and 11	
proposed activity, including identified alternatives,		
on the environment		
(k) Any mitigation measures for inclusion in the EMPr	Section 12	
(I) Any conditions for inclusion in the environmental		None
authorisation	N/A	required
authorisation (m) Any monitoring requirements for inclusion in the		
authorisation	N/A Section 12	
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Palaeontological Impact Assessment for the proposed Township Establishment on Remainder of Farm Botshabelo

		Comment
Requirements of Appendix 6 – GN R326 EIA	Relevant section	where not
Regulations of 7 April 2017	in report	applicable.
		be
		conducted
		as part of
		the EIA and
		EMPr
		process.
(p) A summary and copies if any comments that were		
received during any consultation process	N/A	
(q) Any other information requested by the competent		Not
authority.	N/A	applicable.
(2) Where a government notice by the Minister provides for	Section 3	
any protocol or minimum information requirement to be	compliance with	
applied to a specialist report, the requirements as	SAHRA	
indicated in such notice will apply.	guidelines	

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EXECUTIVE SUMMARY

Banzai Environmental was appointed by Ngoti Development Consultants to conduct a Palaeontological Impact Assessment for the proposed Township Establishment on Remainder of Farm Botshabelo 826, Erf K1689 and Erf K1690 in Botshabelo, Mangaung Metropolitan Municipality, Free State Province. In accordance with the National Heritage Resources Act (No 25 of 1999, section 38) (NHRA), this study is necessary to confirm if fossil material could potentially be present in the planned development area and to evaluate the impact of the proposed development on the Palaeontological Heritage.

The proposed development is largely underlain by the Upper Adelaide Subgroup (Beaufort Group, Karoo Supergroup) while a small portion in the northwest is underlain by Jurassic dolerite. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Jurassic dolerite is zero as it is igneous in origin and thus unfossiliferous while that of the Balfour Formation is Very High (Almond and Pether 2008, SAHRIS website).

A day site specific field survey of the development footprint was conducted on foot and by motor vehicle on 24 July 2021. No fossiliferous outcrop was found in the proposed development area. The apparent rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a medium significance in palaeontological terms. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

However, if fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the Chance Find Protocol must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, *in situ*) and the ECO/site manager must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carry out by a paleontologist.

Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA. Palaeontological Impact Assessment for the proposed Township Establishment on Remainder of Farm Botshabelo

Palaeontological Impact Assessment for the proposed Township Establishment on Remainder of Farm Botshabelo

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1 INTRODUCTION

Ngoti Development Consultants have been commissioned by the Mangaung Metropolitan Municipality to establish/develop a Township of 2000 sites on the remainder of farm Botshabelo 826, Erf K1689 and Erf K1690 (Figure 1-2).

Botshabelo's location, like so many other settlements in South Africa, is a result of apartheid. Apartheid led to the established of settlement in rural areas close to big towns/cities that were sustained by subsidies for example commuter transport subsidies, subsidized services, and grants for the installation of municipal services. In the past, industrial decentralization subsidies meant to create an economic base. Botshabelo, would most probably collapse without subsidies. Botshabelo is mainly a residential area, while a few factories and warehouses provide employment opportunities for about six thousand people, while it is home to over 81,713 individuals (according to the Census in 2011). Botshabelo is the largest township in the Free State and second largest in South Africa after Soweto.

Due to the rapid development of informal settlements and population growth there has been a dire need for land to accommodate citizens, with adequate housing, services, and infrastructure. The municipality thus plans to develop vacant areas with sustainable housing with the necessary municipal services and social facilities.

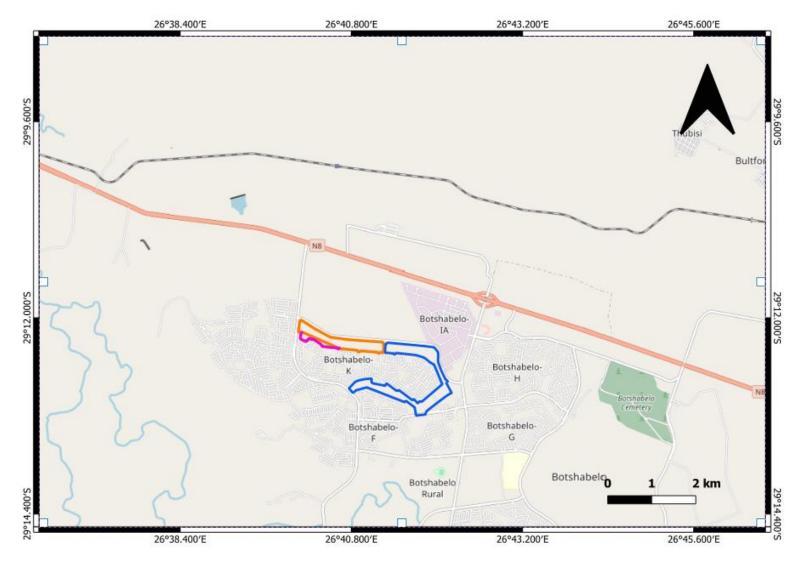


Figure 1: Location of the proposed township development.

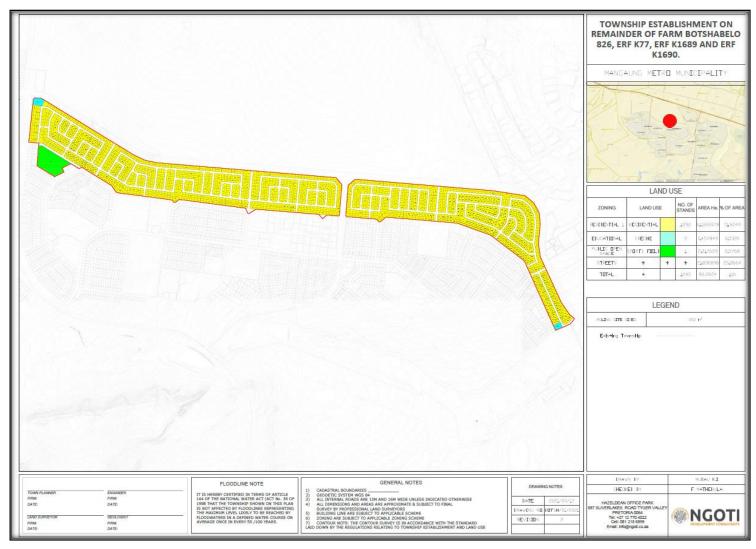


Figure 2. Township layout.

2 QUALIFICATIONS AND EXPERIENCE OF THE AUTHOR

This present study has been conducted by Mrs Elize Butler. She has conducted approximately 300 palaeontological impact assessments 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, includes all heritage resources, is protected by the National Heritage Resources Act (Act 25 of 1999) (NHRA). Heritage resources as defined in Section 3 of the Act include "all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

Palaeontological heritage is unique 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 Palaeontological Impact Assessment forms part of the Heritage Impact Assessment (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 form of linear development or barrier exceeding 300m in length;
- the construction of a bridge or similar structure exceeding 50m in length;
- any development or other activity which will change the character of a site
 - a. (exceeding 5 000 m² in extent; or

- b. involving three or more existing erven or subdivisions thereof; or
- c. 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
- e. the re-zoning of a site exceeding 10 000m² in extent;
- or any other category of development provided for in regulations by SAHRA or a Provincial heritage resources authority.

4 OBJECTIVE

The objective of a Palaeontological Impact Assessment (PIA) is to determine the impact of the development on potential palaeontological material at the site.

According to the "SAHRA APM Guidelines: Minimum Standards for the Archaeological and Palaeontological Components of Impact Assessment Reports" the aims of the PIA are: 1) to identify the palaeontological status of the exposed as well as rock formations just below the surface in the development footprint 2) to estimate the palaeontological importance of the formations 3) to determine the impact on fossil heritage; and 4) to recommend how the developer ought to protect or mitigate 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/kmls) in the proposed development.
- Evaluation of the significance of the planned development during the Preconstruction, Construction, Operation, Decommissioning Phases and Cumulative

impacts. Potential impacts should be rated in terms of the direct, indirect, and cumulative:

- a. Direct impacts are impacts that are caused directly by the activity and generally occur at the same time and at the place of the activity.
- b. Indirect impacts of an activity are indirect or induced changes that may occur as a result of the activity.
- c. Cumulative impacts are impacts that result from the incremental impact of the proposed activity on a common resource when added to the impacts of other past, present or reasonably foreseeable future activities.
- Fair assessment of alternatives (infrastructure alternatives have been provided).
- Recommend mitigation measures to minimise the impact of the proposed development; and
- Implications of specialist findings for the proposed development (such as permits, licenses etc).

5 GEOLOGICAL AND PALAEONTOLOGICAL HISTORY

The geology of the proposed Botshabelo Township development is depicted on the 1: 250 000 2928 Bloemfontein Geological Map (1966) (Council for Geoscience, Pretoria) (Figure 3). The proposed development is largely underlain by the Balfour Formation of the Upper Adelaide Subgroup (Beaufort Group, Karoo Supergroup) while a small portion in the northwest is underlain by Jurassic dolerite. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Jurassic dolerite is zero as it is igneous in origin and thus unfossiliferous while that of the Balfour Formation is Very High (Almond and Pether 2008, SAHRIS website).

The Jurassic dolerite (Jd-red) present in the area surrounding the development belongs to the Karoo Igneous Province that is a classic continental flood basalt province formed during the Early Jurassic. This province occurs over a large area in southern Africa and comprises a widespread system well developed igneous bodies (dykes, sills) that invaded the sediments of the Main Karoo Basin. Flood basalts do not typically form any visible volcanic structures, but with a series of outbursts form a suite of fissures of sub-horizontal lava flows that may vary in thickness. The Karoo is an old flood basalt province and is preserved today as erosional remnants of a more extensive lava cap that covered much of southern Africa in the geological past. As this Suite consist of igneous rocks it is unfossiliferous.

Table 2: Adelaide Subgroup (modified Johnson 2006)

Period	Supergroup	Group	Subgroup	Formation West of 24° E	Formation East of 24° E
					Balfour Formation
- sic	dno	<u>a</u>	roup		Ballour i offiliation
lle Permian dle Triassic	o Supergroup	Beaufort Group	de Subgroup	Teekloof Formation	Middleton Formation
Middle F Middle	Karoo	Bea	Adelaide	Abrahamskraal Formation	Koonop Formation

The proposed development is underlain by a series of Karoo mudstones, sandstones and shales, which were deposited under fluvial environments of the Adelaide Subgroup. The Adelaide Subgroup forms part of the Beaufort Group. The Beaufort Group is the third of the main subdivisions of the Karoo Supergroup. This group overlays the Ecca and consists essentially of sandstones and shales, deposited in the Karoo Basin from the Middle Permian to the early part of the Middle Triassic periods. The Beaufort Group was deposited on land through alluvial processes. This Group covers a total land surface area of approximately 200 000 km² in South Africa and is the first fully continental sequence in the Karoo Supergroup. The Beaufort Group is divided into the Adelaide and the overlying Tarkastad Subgroup. The Adelaide subgroup rocks are deposited under a humid climate that allowed for the establishment of wet floodplains with high water tables and are interpreted to be fluvio-lacustrine sediments (Johnson *et al* 2006).

In the south eastern portion of the Karoo Basin the Adelaide Subgroup consists of the Koonap, Middleton and Balfour Formations. West of 24° the Adelaide Subgroup is represented by the Abrahamskraal and Teekloof Formations and in the north the Group is represented by the Normandien Formation (Table 2). The Adelaide Subgroup is approximately 5 000 m thick in the southeast, but this decreases to about 800m in the centre of the basin which thinness out to about 100 to 200m in the north. The Balfour Formation is approximately 200 m thick, while the Abrahamskraal Formation is about 2 500 m thick and the Teekloof Formation 1 000 m. The Normandien Formation is only about 320 m thick.

The Adelaide Subgroup contains alternating greyish-red, bluish-grey, or greenish grey mudrocks in the southern and central parts of the Karoo Basin with very fine to medium grained, grey lithofeldspathic sandstones. In the northern Normandien formation the basin

consists of course to very coarse sandstones and granulostones. Coarsening-upward cycles are present in the lower part of the Normandien Formation while the mudrocks and sandstone units usually form fining-upward cycles. These cycles are positioned on erosion surfaces which is overlain by thin intraformational mud-pellet conglomerate and vary in thickness from a few meters to tens of meters. Singular sandstone units could vary from 6 meters to 60 meters in the south thinning northwards, but thick sandstone units are also present in the northern Normandien Formation (Groenewald1989, 1990).

The thicker sandstones of the Adelaide are usually multi-storey and usually have cut-and fill features. The sandstones are characterized internally by horizontal lamination together with parting lineation and less frequent trough crossbedding as well as current ripple lamination. The bases of the sandstone units are massive beds, while ripple lamination is usually confined to thin sandstones towards the top of the thicker units. The mudrocks of the Adelaide Subgroup usually has massive and blocky weathering apart from in the Normandien and Daggaboersnek Member (Groenewald1989, 1990). Sometimes desiccation cracks and impressions of raindrops are present. In the mudstones of the Beaufort Group calcareous nodules and concretions occur throughout.

The flood plains of the Beaufort Group (Karoo Supergroup) are internationally renowned for the early diversification of land vertebrates and provide the worlds' most complete transition from early "reptiles" to mammals. The Beaufort Group is subdivided into a series of biostratigraphic units based on its faunal content (Figure 4) (Kitching1977, 1978; Keyser et al, 1977, Rubidge 1995). As previously mentioned, large areas of the development are underlain by the Balfour Formation which is divided in the Daptocephalus (DAZ) and lower Lystrosaurus Assemblage Zone (LAZ) (Rubidge 1995, Smith 2012; Viglietti et al 2015, Figure 4). The Daptocephalus Assemblage Zone expands into the lower Palingkloof /Harrismith Member of the Upper Balfour Formation. This Zone is characterized by the occurrence of the two therapsids namely Dicynodon and Theriognathus. The Daptocephalus Zone of the Beaufort Group shows the greatest vertebrate diversity and includes numerous wellpreserved genera and species of dicynodonts, biarmosuchians, gorgonopsian, therocephalian and cynodont therapsid Synapsida. Captorhinid Reptilia are also present while eosuchian Reptilia, Amphibia and Pisces are rarer in occurence. Trace fossils of vertebrates and invertebrates as well as Glossopteris flora plants have also been described.

The lower Palingkloof Member is of special importance as it precedes the Permo-Triassic Extinction Event which destroyed the vertebrate fauna and extinguished the diverse

glossopterid plants. The lower *Lystrosaurus* Assemblage Zone forms part of the Katberg Formation. Fauna and flora from this assemblage zone is rare as few genera survived the Permo-Triassic Extinction Event. The *Lystrosaurus* Assemblage Zone is characterized by the dicynodont, *Lystrosaurus*, and captorhinid reptile, *Procolophon*, biarmosuchian and gorgonopsian Therapsida did not survive into the *Lystrosaurus* Assemblage Zone although the therocephalian and cynodont Therapsida are present in moderate quantities. Captorhinid Reptilia are reduced, but this interval is characterised by a unique diversity of oversize amphibians while fossil fish, millipedes and diverse trace fossils have also been recorded.

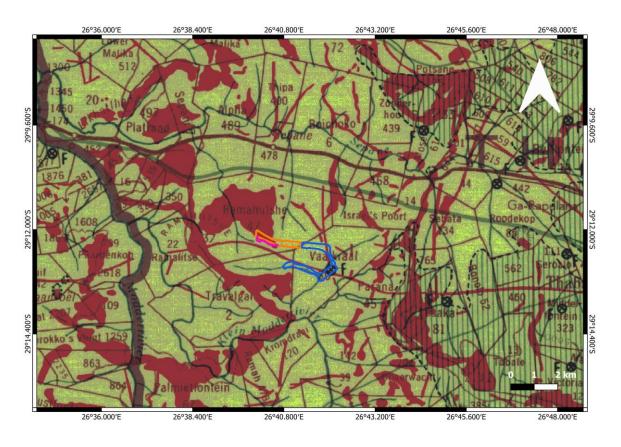


Figure 3: Extract of the 1:250 000 2926 Bloemfontein Geological map (1966) (Council of Geoscience) of the proposed Township Establishment on Remainder of Farm Botshabelo 826, Erf K1689 and Erf K1690 in Botshabelo, Mangaung Metropolitan Municipality, Free State Province. The proposed development is largely underlain by the Balfour Formation of the Adelaide Subgroup (light green) (Beaufort Group, Karoo Supergroup) while a small portion in the northwest is underlain by Jurassic dolerite (red).

Age	Gp			West of 24° E	East of 24° E			Free State / waZulu-Natal	Vertebrate Assemblage Zones	Vertebrate Subzones		
2						Drakensberg Gp		Drakensberg Gp				
ASS	Ŋ							Clarens Fm		Clarens Fm		
JURASSIC	STORMBERG					upper Elliot Fm	ι	pper Elliot Fm	- Massospondylus			
	ORN				_	lower Elliot Fm	\sim_{i}	ower Elliot Fm	Scalenodontoides			
	ST				$\overline{}$	Molteno Fm	~	Molteno Fm	Galleriodoritorio	~~~~		
						Wollens I III	\sim	Workens I'm		Cricodon-Ufudocyclops		
TRIASSIC		pgp				Burgersdorp Fm		Driekoppen Fm	Cynognathus	Trirachodon-Kannemeyeria		
IAS		J Su				Durger scorp 1 m		Впекоррен т пі		Langbergia-Gargainia		
TRI		Tarkastad Subgp				Katberg Fm	V	erkykerskop Fm	Lystrosaurus declivis			
						Palingkloof M.		~~~				
						Elandsberg M.	m M _	Harrismith M.				
						, , , , , , , , , , , , , , , , , , ,		Schoondraai M.		Lystrosaurus maccaigi- Moschorhinus		
					Balfour Fm	Ripplemead M.	ande		Daptocephalus			
					Bal	Bal	Rooinekke M.		Dicynodon-Theriognathus			
		۵	FB	Steenkampsvlakte M.		Daggaboersnek M.	aboersnek M.					
	RT	lbqn	loof	Oteonkampsviakte W.				Frankfort M.				
	UFC	de S	Teekloof Fm	Oukloof M.		Oudeberg M.	\smile		Cistecephalus			
PERMIAN	BEAUFORT	Adelaide Subgp	.	Hoedemaker M.		Middleton Fra				Tropidostoma-Gorgonops		
R		⋖		Poortjie M.	Middleton Fm				Endothiodon	Lycosuchus-Eunotosaurus		
밆				, sorgio						Diictodon-Styracocephalus		
	Abrahamskraal Fm			Kaanan Em		Valler et Em	Tapinocephalus	Eosimops-Glanosuchus				
				Abranamskraai Fm	Koonap Fm		Koonap Fm Volksrust Fm		Eodicynodon	Losimops-Gianosuchus		
	Ą			Waterford Fm	Waterford Fm				Zodicyriodoff			
	ECCA			Tierberg/Fort Brown		Fort Brown						

Figure 4: Vertebrate biozonation range chart for the Main Karoo Basin of South Africa. Solid lines indicate known ranges, dotted lines indicate suspected but not confirmed ranges, single dot represents the stratigraphis position of the taxa that have only been recovered from a single bed. Wavy lines indicate unconformities. (PLYCSR=Pelycosauria and MAMMFMES+Mammaliaformes. Gp=group, Subgp-Supbroup, Fm=Formation, M=Member.

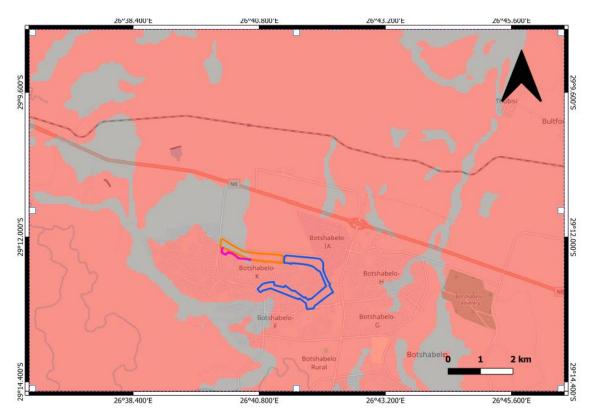


Figure 5: Extract of the 1 in 250 000 SAHRIS PalaeoMap map (Council of Geosciences). Location of the proposed development is indicated in variegated colours with the pipeline in brown.

Colour	Sensitivity	Required Action
RED	VERY HIGH	field assessment and protocol for finds is required
ORANGE/YELLOW	HIGH	desktop study is required and based on the outcome of the desktop study, a field assessment is likely
GREEN	MODERATE	desktop study is required
BLUE	LOW	no palaeontological studies are required however a protocol for finds is required
GREY	INSIGNIFICANT/ZERO	no palaeontological studies are required
WHITE/CLEAR	UNKNOWN	these areas will require a minimum of a desktop study. As more information comes to light, SAHRA will continue to populate the map.

According to the SAHRIS Palaeosensitivity Map (Figure 6) there is a Very High chance (red) and a zero chance (grey) to find fossils in this area.

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6 GEOGRAPHICAL LOCATION OF THE SITE

Botshabelo is a formal township about 55 km from Bloemfontein that was established in the 1980s and is located next to the N8 National Road leading to the Lesotho-South Africa Border. The Census of 2011 established that Botshabelo comprised of more than 181,713 individuals which represented about 24% of the population in Free State.

7 METHODS

The aim of a Palaeontological Impact Assessment is to evaluate the risk to palaeontological heritage in the proposed development. This includes all trace fossils and fossils. All available information is consulted to compile a PIA and includes Palaeontological impact assessment reports in the same area; aerial photos and Google Earth images, topographical as well as geological maps.

7.1 Assumptions and Limitations

The focal point of geological maps is the geology of the area and the sheet explanations were not meant to focus on palaeontological heritage. Many inaccessible regions of South Africa have never been reviewed by palaeontologists and data is generally based on aerial photographs alone. Locality and geological information of museums and universities databases have not been kept up to date or data collected in the past have not always been accurately documented.

Comparable Assemblage Zones in other areas is sourced to provide information on the existence of fossils in an area which was not documented in the past. When using similar Assemblage Zones and geological formations for Desktop studies it is generally assumed that exposed fossil heritage is present within the footprint. A field-assessment will thus improve the accuracy of the desktop assessment.

8 ADDITIONAL INFORMATION CONSULTED

In compiling this report the following sources were consulted:

- Geological map 1:100 000, Geology of the Republic of South Africa (Visser 1984)
- 1: 250 000 2928 Bloemfontein Geological map (1966) (Council of Geoscience)
- A Google Earth map with polygons of the proposed development was obtained from
 Ngoti Development Consultants

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9 SITE VISIT

A one-day site specific field survey of the development footprint was conducted on foot and by motor vehicle on 24 July 2021. No fossiliferous outcrops were identified but. fossil heritage could be embedded within rocks beneath the surface. It is thus possible that fossil heritage could be present in the development footprint and thus a Chance Find Protocol is included in this report. The following photographs were taken during the site visit to the proposed development



Figure 6: View from the N8 National Road over the proposed township development. No fossiliferous outcrop present.

GPS Coordinates: -29,202500S 26.671944 E



Figure 7: Flat topography with no fossiliferous outcrop.

GPS Coordinates: -29,205278S 26.684444 E



Figure 8: View from east to west over the proposed development. Flat topography with no fossiliferous outcrop.

GPS Coordinates: -29,208333S 26.699722 E



Figure 9: Rivulet bank without any fossiliferous outcrop GPS Coordinates: -29,211389S 26.70333 E



Figure 10: Small water body with flat topography without any fossiliferous outcrops

GPS Coordinates: -29,213611S 26.699444 E

10 IMPACT ASSESSMENT AND RANKING METHODOLOGY

10.1 Impact Rating System

Impact assessment must take account of the nature, scale and duration of impacts on the environment whether such impacts are positive or negative. Each impact is also assessed according to the following project phases:

- Construction
- Operation
- Decommissioning

Where necessary, the proposal for mitigation or optimisation of an impact should be detailed. A brief discussion of the impact and the rationale behind the assessment of its Palaeontological Impact Assessment for the proposed Township Establishment on Remainder of Farm Botshabelo

significance should also be included. The rating system is applied to the potential impacts on the receiving environment and includes an objective evaluation of the mitigation of the impact. In assessing the significance of each impact the following criteria is used:

Table 3: The rating system

NATUR	RE				
Includ	Include a brief description of the impact of environmental parameter being assessed in the				
contex	context of the project. This criterion includes a brief written statement of the environmental				
aspect	being impacted upon by a part	cicular action or activity.			
GEOG	RAPHICAL EXTENT				
This is	defined as the area over which	the impact will be experienced.			
1	Site	The impact will only affect the site.			
2	Local/district	Will affect the local area or district.			
3	Province/region	Will affect the entire province or region.			
4	International and National	Will affect the entire country.			
PROB	ABILITY				
This d	escribes the chance of occurre	nce of an impact.			
1	Unlikely	The chance of the impact occurring is extremely low			
		(Less than a 25% chance of occurrence).			
2	Possible	The impact may occur (Between a 25% to 50%			
		chance of occurrence).			
3	Probable	The impact will likely occur (Between a 50% to 75%			
		chance of occurrence).			
4	Definite	Impact will certainly occur (Greater than a 75%			
		chance of occurrence).			
DURA	TION				
This d	escribes the duration of the imp	pacts. Duration indicates the lifetime of the impact as a			
result	of the proposed activity.				
1	Short term	The impact will either disappear with mitigation or			
		will be mitigated through natural processes in a span			
		shorter than the construction phase (0 - 1 years), or			
		the impact will last for the period of a relatively short			
		construction period and a limited recovery time after			
		construction, thereafter it will be entirely negated (0			
		- 2 years).			
1	I				

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2	Medium term	The impact will continue or last for some time after
_	Wediam term	the construction phase but will be mitigated by direct
		human action or by natural processes thereafter (2 –
	11 (10 years).
3	Long term	The impact and its effects will continue or last for the
		entire operational life of the development but will be
		mitigated by direct human action or by natural
		processes thereafter (10 – 30 years).
4	Permanent	The only class of impact that will be non-transitory.
		Mitigation either by man or natural process will not
		occur in such a way or such a time span that the
		impact can be considered indefinite.
INTEN	ISITY/ MAGNITUDE	
Desci	ibes the severity of an impact.	
1	Low	Impact affects the quality, use and integrity of the
		system/component in a way that is barely
		perceptible.
<mark>2</mark>	Medium	Impact alters the quality, use and integrity of the
		system/component but system/component still
		continues to function in a moderately modified way
		and maintains general integrity (some impact on
		integrity).
3	High	Impact affects the continued viability of the system/
		component and the quality, use, integrity and
		functionality of the system or component is severely
		impaired and may temporarily cease. High costs of
		rehabilitation and remediation.
4	Very high	Impact affects the continued viability of the
		system/component and the quality, use, integrity and
		functionality of the system or component
		permanently ceases and is irreversibly impaired.
		Rehabilitation and remediation often impossible. If
		possible rehabilitation and remediation often
		unfeasible due to extremely high costs of
		rehabilitation and remediation.

Table 1 Continues

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REVER	REVERSIBILITY			
This de	This describes the degree to which an impact can be successfully reversed upon			
completion of the proposed activity.				
1	Completely reversible	The impact is reversible with implementation of		
		minor mitigation measures.		
2	Partly reversible	The impact is partly reversible but more intense		
		mitigation measures are required.		
3	Barely reversible	The impact is unlikely to be reversed even with		
		intense mitigation measures.		
4	Irreversible	The impact is irreversible and no mitigation		
		measures exist.		
IRREPLACEABLE LOSS OF RESOURCES				
This de	This describes the degree to which resources will be irreplaceably lost as a result of a			
proposed activity.				
1	No loss of resource	The impact will not result in the loss of any		
		resources.		
2	Marginal loss of resource	The impact will result in marginal loss of resources.		
3	Significant loss of resources	The impact will result in significant loss of resources.		
<mark>4</mark>	Complete loss of resources	The impact is result in a complete loss of all		
		resources.		
CUMULATIVE EFFECT				
This describes the cumulative effect of the impacts. A cumulative impact is an effect which				
in itself may not be significant but may become significant if added to other existing or				
potential impacts emanating from other similar or diverse activities as a result of the project				
activity in question.				
1	Negligible cumulative	The impact would result in negligible to no		
	impact	cumulative effects.		
2	Low cumulative impact	The impact would result in insignificant cumulative		
		effects.		

Table 1 Continues

Medium cumulative impact

High cumulative impact

SIGNIFICANCE

3

4

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effects

826, Erf K1689 And Erf K1690 in Botshabelo, Mangaung Metropolitan Municipality, Free State Province

The impact would result in minor cumulative effects.

The impact would result in significant cumulative

Significance is determined through a synthesis of impact characteristics. Significance is an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The calculation of the significance of an impact uses the following formula:

(Extent + probability + reversibility + irreplaceability + duration + cumulative effect) x magnitude/intensity.

The summation of the different criteria will produce a non-weighted value. By multiplying this value with the magnitude/intensity, the resultant value acquires a weighted characteristic which can be measured and assigned a significance rating.

Points	Impact significance rating	Description
6 to 28	Negative low impact	The anticipated impact will have negligible negative
		effects and will require little to no mitigation.
6 to 28	Positive low impact	The anticipated impact will have minor positive
		effects.
29 to 50	Negative medium impact	The anticipated impact will have moderate negative
		effects and will require moderate mitigation
		measures.
29 to 50	Positive medium impact	The anticipated impact will have moderate positive
		effects.
51 to 73	Negative high impact	The anticipated impact will have significant effects
		and will require significant mitigation measures to
		achieve an acceptable level of impact.
51 to 73	Positive high impact	The anticipated impact will have significant positive
		effects.
74 to 96	Negative very high	The anticipated impact will have highly significant
	impact	effects and are unlikely to be able to be mitigated
		adequately. These impacts could be considered
		"fatal flaws".
74 to 96	Positive very high impact	The anticipated impact will have highly significant
		positive

10.2 Summary of Impacts

(Extent (1) + probability (3) + reversibility (4) + irreplaceability (4) + duration (4) + cumulative effect (2) x magnitude/intensity (2) = 36.

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The impact on Fossil Heritage is DIRECT NEGATIVE. Only the study site will be affected by the proposed development. The expected duration of the impact is assessed as potentially permanent. The impact is highly destructive but will only occur during the construction phase. The significance of the impact occurring will be medium. As fossil heritage will be destroyed the impact is irreversible but the degree to which the impact can cause irreplaceable loss of resources is Moderate if proper mitigation is undertaken.

11 FINDINGS AND RECOMMENDATIONS

The proposed development is largely underlain by the Balfour Formation of the Adelaide Subgroup (Beaufort Group, Karoo Supergroup) while a small portion in the northwest is underlain by Jurassic dolerite. According to the PalaeoMap of South African Heritage Resources Information System the Palaeontological Sensitivity of the Jurassic dolerite is zero as it is igneous in origin and thus unfossiliferous while that of the Balfour Formation is Very High (Almond and Pether 2008, SAHRIS website).

A day site specific field survey of the development footprint was conducted on foot and by motor vehicle on 24 July 2021. No fossiliferous outcrop was found in the proposed development area. The apparent rarity of fossil heritage in the proposed development footprint suggests that the impact of the development will be of a medium significance in palaeontological terms. It is therefore considered that the proposed development will not lead to damaging impacts on the palaeontological resources of the area. The construction of the development may thus be permitted in its whole extent, as the development footprint is not considered sensitive in terms of palaeontological resources.

However, if fossil remains are discovered during any phase of construction, either on the surface or exposed by excavations the Chance Find Protocol must be implemented by the ECO/site manager in charge of these developments. These discoveries ought to be protected (if possible, *in situ*) and the ECO/site manager must report to SAHRA (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za) so that mitigation (recording and collection) can be carry out by a paleontologist.

Preceding any collection of fossil material, the specialist would need to apply for a collection permit from SAHRA. Fossil material must be curated in an accredited collection (museum or university collection), while all fieldwork and reports should meet the minimum standards for palaeontological impact studies suggested by SAHRA.

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12 CHANCE FINDS PROTOCOL

The following procedure will only be followed if fossils are uncovered during the excavation phase of the development.

12.1 Legislation

Cultural Heritage in South Africa (includes all heritage resources) is protected by the National Heritage Resources Act (Act No 25 of 1999) (NHRA). According to Section 3 of the Act, all Heritage resources include "all objects recovered from the soil or waters of South Africa, including archaeological and palaeontological objects and material, meteorites and rare geological specimens".

Palaeontological heritage is unique and non-renewable and is protected by the NHRA and are the property of the State. It is thus the responsibility of the State to manage and conserve fossils on behalf of the citizens of South Africa. Palaeontological resources may not be excavated, 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.

12.2 Background

A fossil is the naturally preserved remains (or traces thereof) of plants or animals embedded in rock. These organisms lived millions of years ago. Fossils are extremely rare and irreplaceable. By studying fossils, it is possible to determine the environmental conditions that existed in a specific geographical area millions of years ago.

12.3 Introduction

This informational document is intended for workmen and foremen on construction sites. It describes the actions to be taken when mining or construction activities accidentally uncovers fossil material.

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It is the responsibility of the Environmental Site Officer (ESO) or site manager of the project to train the workmen and foremen in the procedure to follow when a fossil is accidentally uncovered. In the absence of the ESO, a member of the staff must be appointed to be responsible for the proper implementation of the chance find protocol as not to compromise the conservation of fossil material.

12.4 Chance Find Procedure

- If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.
- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.
- A preliminary report must be submitted to the Heritage Agency within 24 hours of the find and must include the following: 1) date of the find; 2) a description of the discovery and a 3) description of the fossil and its context (depth and position of the fossil), GPS co-ordinates.
- Photographs (the more the better) of the discovery must be of high quality, in focus, accompanied by a scale. It is also important to have photographs of the vertical section (side) where the fossil was found.

Upon receipt of the preliminary report, the Heritage Agency will inform the ESO (or site manager) whether a rescue excavation or rescue collection by a palaeontologist is necessary.

- The site must be secured to protect it from any further damage. No attempt should be made to remove material from their environment. The exposed finds must be stabilized and covered by a plastic sheet or sand bags. The Heritage agency will also be able to advise on the most suitable method of protection of the find.
- If the fossil cannot be stabilized the fossil may be collected with extreme care by the ESO. Fossils finds must be stored in tissue paper and in an appropriate box while due care must be taken to remove all fossil material from the rescue site.

 Once the Heritage Agency has issued the written authorization, the developer may continue with the development on the affected area.

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Appendix A - Elize Butler CV

CURRICULUM VITAE

ELIZE BUTLER

PROFESSION: Palaeontologist

YEARS' EXPERIENCE: 26 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

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INTERNATIONAL VISITS

Natural History Museum, London

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